

Tuesday, 28 February 2023

(10.00 am)

MR BLAKE: Good morning, sir.

SIR WYN WILLIAMS: Good morning.

MR BLAKE: Sir, before we begin with today's witness

I'd just like to say that yesterday the Inquiry received over 700 documents from Post Office Limited that are potentially relevant to issues to be explored in Phase 3. This disclosure includes documents said to be provided to members of NBSC to assist in dealing with calls for assistance from subpostmasters.

The Inquiry considers that the vast majority of these documents should have been provided further to a Rule 9 Request sent on 18 February 2022.

We have considered carefully whether to seek to postpone hearing some of the witnesses this week until such time as those documents have been fully reviewed and disclosed to Core Participants. However, we propose not to do so. This is because the witness can speak to a number of other issues and those issues should be investigated now. Your legal team will continue to review the newly disclosed documents

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MR BLAKE: Thank you. Can you give your full name, please.

A. Yeah, Shaun Turner.

Q. Mr Turner, you should have in front of you a witness statement dated 13 January 2023.

A. I do.

Q. It has the URN WITN04640100. If I can ask you to turn to page 91 of that statement, is that your signature there?

A. It is.

Q. Thank you. Can you confirm that statement is true to the best of your knowledge and belief?

A. It is.

Q. Thank you. I know that there are couple of areas that you'd like to expand upon or clarify in due course. We don't need to address those now, we can address them shortly. That statement is going into evidence, so I'm not going to ask you about every single detail contained in that witness statement. The questions I'll ask today will be supplementary, although I am going to start by asking you a bit about your background.

That takes up several pages of your witness statement because you've held a lot of positions

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and provide them, where they are relevant, to

Core Participants in due course.

We propose keeping under consideration whether it's necessary to arrange additional sitting days to hear oral evidence on those issues raised in that disclosure.

The Inquiry can, of course, recall any witnesses heard this week to speak to those documents should it become necessary.

SIR WYN WILLIAMS: Thank you, Mr Blake. I think you probably know that I was informed of this state of affairs, to be precise, at about 7.05 last evening, so I have had the opportunity to reflect upon the course of action which you propose overnight and, in short, I agree with it. I don't think anything would be served by adjourning for a short period and asking witnesses who made themselves ready to give evidence not to do so. I think the course that you suggest is preferable, and so that's what we'll do.

MR BLAKE: Thank you very much, sir. In light of that, may I please call Mr Shaun Turner.

SHAUN TURNER (affirmed)

Questioned by MR BLAKE

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and a lot of those positions have quite long titles, so I'm going to try and go through a few of those to assist the Inquiry with a little bit more detail.

But it's clear you were employed by the Post Office since 1996. Did you hold any other job before that or was that your first significant employment?

A. Apart from part-time work, it was essentially the first job that I picked up after university.

Q. Thank you. You say in your statement that between 1996 and 1998 you worked in the northeast region helpdesk and customer care. Can you tell us -- that was pre-Horizon?

A. Yes.

Q. What did working on the helpdesk pre-Horizon involve?

A. It involved taking calls from branches and, at that time, from also Post Office customers, resolving queries, resolving customer complaints.

Q. You were, at that stage, familiar with balancing in the paper method?

A. Yes.

Q. 1999 you became an NBSC analyst.

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1 A. Mm-hm.
 2 Q. You're the first witness from the NBSC, so can
 3 you please tell us what was the NBSC?
 4 A. The NBSC was the Network Business Support Centre
 5 it was set up in line with the Horizon rollout.
 6 So the idea was, as branches migrated onto
 7 Horizon, they would stop contacting their
 8 regional helpline and start contacting the NBSC
 9 and the NBSC would then become the helpline for
 10 Horizon branches, fulfilling the same function
 11 as the regional helplines did.
 12 Q. I think we've heard in previous evidence about
 13 first line of support, second line of support.
 14 Can you tell us briefly where you fit into the
 15 mix of different levels of support?
 16 A. Yes. I was aligned with the second line of
 17 support which was called tier 2, which was
 18 operated by Post Office, so that was the
 19 advisers that dealt with the more complicated
 20 enquiries. The first tier was actually not
 21 managed by Post Office; it was managed by
 22 another part of Royal Mail Group called SSL and
 23 they had their own sort of management structure,
 24 team leaders and they dealt with the sort of
 25 more basic enquiries, anything that was more

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1 Q. Were there policies in place that clearly
 2 defined the roles of the NBSC and the Horizon
 3 Service Desk, vis à vis one another?
 4 A. I don't remember any policy documents as such.
 5 I remember communications and, in the materials
 6 that went out to branches, that that was made
 7 clear. And I think from a contractual
 8 perspective, from what I understood, it was
 9 quite clear from a contractual perspective what
 10 the sort of delineation of those two helpdesks'
 11 scope and responsibility was.
 12 Q. Let's say if I had a bug with my Horizon
 13 terminal, who would I call?
 14 A. If you thought that there was a problem with the
 15 system then you would call HSD.
 16 Q. If I had a problem balancing but I didn't know
 17 what was causing it, who would I call?
 18 A. NBSC in the first instance.
 19 Q. You said there was some confusion between the
 20 two by postmasters. Can you describe that
 21 a little bit for us?
 22 A. Yeah, I think it was just general -- this was
 23 new to postmasters, there was a learning curve,
 24 they were trying to deal with a lot, trying to
 25 learn a lot in the branches and sometimes they

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1 complicated or required, so a longer diagnosis
 2 would be passed to the tier 2 team.
 3 Q. If I were a subpostmaster or an assistant and
 4 I wanted to speak to somebody about a problem
 5 with Horizon, who would I call in the first
 6 instance?
 7 A. It depends what the problem was. If it was sort
 8 of operational procedures or navigation, it
 9 would be the NBSC and, in the first instance,
 10 that would be the tier 1 NBSC and, if they
 11 couldn't deal with it, it went on to tier 2. If
 12 it was system-related issues, your printer
 13 wasn't working, something like that, it would be
 14 HSD, which was managed by Fujitsu.
 15 Q. Is that the Horizon Service Desk?
 16 A. Yes.
 17 Q. Thank you. How would I know which to call?
 18 A. There were communications to branches that made
 19 it clear that if it is a system problem, then
 20 you ring this helpdesk; if it is a navigation or
 21 operational kind of enquiry, then you ring the
 22 NBSC. That wasn't always followed. We did get
 23 a lot of branches ringing the wrong helpdesk and
 24 that resulted in, at times, transfers between
 25 the helpdesks where we had to reroute callers.

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1 just rang the wrong helpdesk and needed to be
 2 rerouted. But there were other kind of queries
 3 that may involve or may require the interaction
 4 with both helpdesks.
 5 So, for example, if you were trying to
 6 produce your trading statement, your cash
 7 account, and your printer broke, you would need
 8 to report that to the HSD but you may also need
 9 to report to the NBSC that your cash account
 10 would be delayed, for example.
 11 Q. Was there ever a single point of contact or
 12 would you, the subpostmaster, have to make
 13 contact with both?
 14 A. We would generally, the helpdesk that dealt with
 15 the call first would deal with their bit of the
 16 call and then transfer the call across to the
 17 other helpdesk to deal with the final bit.
 18 Q. Again, in relation to policies that existed, was
 19 there something that set that out, that the
 20 first helpline would be the one that dealt with
 21 the problem or took leadership or ownership of
 22 it?
 23 A. Not to my recollection.
 24 Q. Can you tell us at 1999 what was your role at
 25 the NBSC?

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1 A. So in 1999 I was -- in late 1999, I became
 2 an NBSC incident analyst. So that was a role --
 3 one of two roles that were attached to tier 2 in
 4 the NBSC and we had accountability for building
 5 reports to monitor calls coming in to the
 6 helpdesk and we had a link to the Problem
 7 Management Team, if there were issues that we
 8 saw kind of repeating.

9 Q. Would you speak directly with branches in that
 10 role?

11 A. Not typically, no. I'm not saying that that
 12 never happened but, typically, it would be the
 13 advisers or sometimes the team leaders and they
 14 would sometimes bring issues to us, but not
 15 typically during the course of my role as an
 16 incident analyst, no.

17 Q. So your role was principally analysing trends
 18 and things like that?

19 A. Yeah, I mean, it did perform a sort of ancillary
 20 support function for the advisers because their
 21 team leader may not always be about. So, you
 22 know, any manager could be approached with
 23 queries from advisers. So I'm not saying that
 24 there was no interaction with postmasters but
 25 I was saying it would be rare, compared to

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1 a separate team that made those outbound calls,
 2 which was from Chesterfield but, when I moved
 3 into the network conformance capacity manager
 4 role, that work was moved back to the NBSC. It
 5 was actually undertaken by the tier 2 advisers,
 6 one of the teams. It was kind of rota'd round
 7 the teams each week.

8 And also that role, we did sort of capacity
 9 planning, so we were sort of analysing call
 10 arrival patterns and trying to make sure we had
 11 the relevant cover on tier 2, at the helpdesk,
 12 to meet the call volumes.

13 Q. In 2005, you became network co-ordination
 14 adviser. Again, very briefly, can you tell us
 15 what that role involved?

16 A. Yeah, so this was a -- it was initially
 17 a project role when I first moved into it.
 18 There was some reorganisation at that time in
 19 the retail structure, and what they were trying
 20 to do at that stage was -- traditionally, post
 21 offices had a retail network manager that was
 22 connected to each branch and this piece of work
 23 was to have a much more kind of distinct
 24 separation between sales and service. So the
 25 sort of on the ground resources would be focused

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1 a team leader's, who would have day-to-day
 2 interactions with postmasters.

3 Q. September 2001, you became network performance
 4 analyst. What, in simple terms, did that role
 5 involve?

6 A. So this was a -- I moved out of the NBSC at this
 7 point. This was a role, again principally
 8 a role related to data and analysis and this was
 9 looking at sort of conformance related data. So
 10 this may be errors that the branch was making,
 11 and trying to build call campaigns, outbound
 12 call campaigns, to speak to branches about those
 13 errors and ultimately reduce them.

14 Q. You moved on to a banking project before
 15 becoming network conformance and capacity
 16 manager in 2003.

17 A. Yes.

18 Q. I think in that role you looked again at error
 19 rates in conformance within branches to
 20 prioritise calls; is that right?

21 A. That's right, yeah.

22 Q. Can you tell us briefly what that involved?

23 A. That was essentially a rerun of the earlier
 24 role. It was just moved into the NBSC. So
 25 there was a separate team -- in 2001 there was

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1 on the top sales branches and the service
 2 related issues, things like ordering date
 3 stamps, that kind of thing, that had
 4 traditionally gone to the retail network manager
 5 were kind of rerouted centrally through the
 6 NBSC, and if they couldn't resolve it, it would
 7 go on to the service teams who would fulfil
 8 a kind of reactive capability of going out to
 9 branches to resolve issues.

10 So it started off with that piece of
 11 transformation work, building the processes,
 12 developing the processes with NBSC, and then it
 13 morphed into a team that was essentially
 14 attached to that service function and was
 15 responsible for managing relationships with
 16 other business stakeholders.

17 So, for example, Product and Branch
 18 Accounting in Chesterfield, the Problem
 19 Management Team. We would get sort of issues
 20 raised to us from the service managers and we
 21 would take those up with our contacts in those
 22 various teams.

23 Q. After that role, you moved to several different
 24 roles. Is it right to say that they were
 25 predominantly data-related roles, analysing

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1 data; is that your particular area of expertise?
 2 A. Yeah, I think that's a fair categorisation of
 3 the roles that I held from sort of 2010 to late
 4 2015. They were data-related roles and they
 5 were predominantly concerned with conformance
 6 and compliance specifically.
 7 Q. That involves drawing trends together from
 8 various pieces of data to see how Post Office
 9 can perform better?
 10 A. Yeah, and this is mainly to do with -- or at the
 11 time it was mainly to do with sort of mails
 12 compliance specifically. In 2012, we signed the
 13 Mails Distribution Agreement with Royal Mail,
 14 and that had certain sort of SLAs that the Post
 15 Office were expected to hit and things like
 16 segregating your mail correctly in a branch. So
 17 it was mainly related to that sort of data, and
 18 sort of targeting outbound call interventions to
 19 branches to kind of coach them to improve
 20 performance.
 21 Q. I think you're still at the Post Office?
 22 A. Correct, yeah.
 23 Q. What level within the company have you reached?
 24 A. I guess, sort of -- well, lower senior manager,
 25 I guess, in more recent years.

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1 the desk, you know, we were getting a lot of
 2 calls on balancing, not just discrepancies but
 3 just the process itself, how to work through it.
 4 But I didn't, at that time, think that there was
 5 any kind of particular issues with Horizon.
 6 Q. When you say "at that time", which time was
 7 that?
 8 A. When I was an incident analyst in 1999 and 2000.
 9 Q. So the early days of Horizon?
 10 A. Yes.
 11 Q. As things progressed throughout the life of
 12 Horizon, have you ever thought "From what I'm
 13 seeing, there's a problem here"?
 14 A. I think, as I kind of moved into the sort of
 15 service area in 2005, and perhaps in that
 16 intervening period, my thinking did evolve. It
 17 wasn't at that stage that I thought that the
 18 Horizon System was infallible but what I did
 19 think was that bugs were monitored, if there
 20 were issues with the Horizon System, and could
 21 be identified relatively easily by Fujitsu and
 22 HSD; if you referred a branch to them, it should
 23 be clear to them.

24 So I don't think I thought that the system
 25 was foolproof but I thought there was monitoring

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1 Q. Do you ever attend board meetings or anything
 2 along those lines?
 3 A. No, that would be several rungs above me.
 4 Q. So in all of your roles, so some were speaking
 5 directly with branches on occasion or others in
 6 analyst roles, did you look at common problems
 7 that were cropping up and think that there was
 8 a problem with Horizon?
 9 A. When I was with the NBSC there was certainly
 10 problems that were being faced by branches which
 11 were coming through in the trend analysis and we
 12 raised some of those to Problem Management in
 13 due course. I can recall, for example, raising
 14 problems on checklistings, which was an area of
 15 confusion for branches. I can recall raising
 16 problems on the declaration process, so that was
 17 rather clunky and could cause confusion, and
 18 I recall raising problems on obsolete stock
 19 process as well, so various things that would
 20 cause calls to come in to NBSC.
 21 Q. When we talk about bugs, errors and defects in
 22 Horizon, were there any trends that you thought,
 23 "Hang on a minute, there's a problem here"?
 24 A. No, I don't think -- there was obviously issues
 25 in branches with balancing. That was evident on

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1 in place and bugs would be quite easily
 2 identifiable.
 3 Q. We'll come on to talk about bugs shortly but I'm
 4 going to start with training, and that's
 5 something that's addressed in your witness
 6 statement.
 7 A. Yes.
 8 Q. Can you tell us what level of training did you
 9 have, when the NBSC started, in relation to
 10 Horizon?
 11 A. I don't recall exactly. There was some
 12 training. I think either a week or two weeks of
 13 training but I don't recall precisely what
 14 I personally received.
 15 Q. Were you provided, do you think, with more or
 16 less training than subpostmasters were provided?
 17 A. Um ... I think postmasters, if I recall
 18 correctly, had two days or a day and a half.
 19 So, on that basis, I'd have to say that we had
 20 more, yes.
 21 Q. Would you have expected NBSC advisers to know
 22 their way around Horizon as well as or better
 23 than subpostmasters?
 24 A. Yes.
 25 Q. You've described in your statement the training

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1 of subpostmasters in what you describe, I think,
 2 the early to mid-years of your career as having
 3 gaps. Can you tell us briefly about those,
 4 please?
 5 **A.** Yeah, I think this is just a reflection on my
 6 experience on the desk. I mean, we'd moved from
 7 a situation with the regional helplines where,
 8 you know, calls tended to be quite short, even
 9 on balancing after Wednesday afternoons when the
 10 branches balanced. There was not really too
 11 much of a discernible spike in calls. But when
 12 we moved to NBSC and the roll out of Horizon, we
 13 did start seeing not just more calls but longer
 14 calls, calls that took considerable kind of
 15 diagnosis to get to the bottom of it and,
 16 therefore, that leads me to conclude that there
 17 were some weaknesses with the training.

18 My own personal view at that time was that
 19 we had underestimated the sort of step change
 20 that branches were going through. This was
 21 a considerable -- considerably different kind of
 22 automated environment that they were operating
 23 in when they'd been used to a paper-based system
 24 for years. So that's my view at the time and
 25 those were things that were escalated up the

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1 discrepancies for a good few years.
 2 **Q.** Horizon began '99, 2000, so are we talking
 3 a decade longer?
 4 **A.** I think things improved after Horizon, in terms
 5 of the training offer. But I still think the
 6 sort of diagnosis of discrepancies is, you know,
 7 that area in particular did need improvement.
 8 And, as I say, we have improved things in the
 9 past three to four years. So, I would say, I'm
 10 happy with where it is now but between the roll
 11 out of Horizon and, say, four or five years ago,
 12 I would have been less happy. I should make the
 13 point here, as well, that during -- after sort
 14 of 2005, I wasn't sort of directly connected
 15 with the helpdesk or the training area, so these
 16 were just kind of my personal perceptions.
 17 **Q.** You've said in your witness statement that there
 18 was an additional optional classroom session of
 19 investigating discrepancies. Do you know when
 20 that came into force or was brought in?

21 **A.** I believe 2020.

22 **Q.** So, again, that's one of the measures that
 23 you're talking about that's improved the
 24 position in more recent years?

25 **A.** Yeah, because I'd moved back into the training

19

1 chain as well.

2 **Q.** Whose job within the Post Office would it have
 3 been to plan for that kind of event?

4 **A.** During the implementation of Horizon?

5 **Q.** Yes. So the weaknesses you have identified,
 6 whose job was it within POL to make sure that
 7 those didn't occur?

8 **A.** The implementation team.

9 **Q.** Who in particular?

10 **A.** I think it was led by Don Grey at that time.

11 **Q.** You said in the early to mid years of your
 12 career. What period are we talking about where
 13 you have identified gaps in the training of
 14 subpostmasters?

15 **A.** I think it was clear to me that there were gaps
 16 during the roll out of Horizon. But I don't
 17 think we've got everything right since then.
 18 That's not what I'm claiming. I think there
 19 were still gaps and we've made improvements even
 20 in more recent years in the last three or four
 21 years, in areas that I believe improve the sort
 22 of training offer to postmasters.

23 So I think there's been gaps around the sort
 24 of -- particularly around balancing the
 25 diagnosis of discrepancies and rectification of

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1 area since 2020, so I'm kind of more familiar
 2 now with some of the improvements of the last
 3 two years. There may have been improvements in
 4 the intervening period but, as I say, my
 5 perception has been, given that we still had to
 6 produce or implement that investigating
 7 discrepancies course in 2020, that there were
 8 still gaps and still things that needed to be
 9 improved on.

10 **Q.** One thing you've said in your statement is that
 11 there's still less classroom training nowadays.
 12 Can you expand on that briefly?

13 **A.** Yeah, so when I joined the Post Office I think
 14 I'd three to four weeks' training in classroom.
 15 That was alongside postmasters and people going
 16 to work in Crown branches, and that has been
 17 scaled back over the years. Now, some of that
 18 has been replaced with digital learning. So
 19 there is a chunk of digital learning that you do
 20 nowadays before you go to the classroom and
 21 there is the additional sort of investigating
 22 discrepancies course that we have, as well, and
 23 on site, as well. Six days on site.

24 But, yeah, I think there's no doubt that it
 25 has been, you know, scaled back over the years.

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1 Q. Is that for cost reasons or for some other
2 reason?
3 A. I think it's -- the digital offer has obviously
4 replaced the need to be in classroom for some of
5 that, as to what the sort of rationale behind it
6 was, I wasn't connected to those decisions so
7 I couldn't really say whether cost was a factor
8 or there were other rationale.
9 Q. You raise it in your statement, have you raised
10 it elsewhere within the company?
11 A. Not -- I mean, I only came back into -- I came
12 into the training area in 2020. So it wasn't in
13 my sphere, as it were, in the sort of previous
14 years.
15 Q. Can we look at POL00035756, please. This is
16 a document you mention elsewhere in your witness
17 statement under a different topic but I just
18 want to talk about this in relation to training
19 at the moment. It's a document that has the
20 words "Compliance Training" on the left-hand
21 side.
22 A. Mm-hm.
23 Q. It's dated 25 March 2016. Do you know the
24 background to this document at all?
25 A. Yeah, I believe this was part of the Business

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1 branch. Where training has taken place, records
2 have not been kept consistently."
3 The "Rationale for change":
4 "POL need to be able to demonstrate training
5 across the network and maintain robust training
6 records for branches and branch staff."
7 This is 2016. Is this a broader reflection
8 that postmasters don't have access to enough
9 training or is this specifically relating to
10 compliance? It certainly seems to be broader
11 than simply the issue of compliance.
12 A. My take on this is that it is relating to
13 compliance specifically, not least because it is
14 in a document about compliance training but
15 I think "Consideration for Front Office" on the
16 right there does refer to compliance training.
17 Q. Is it your belief that in 2016 there was or
18 wasn't some thinking within the Post Office
19 about the sufficiency of the training that was
20 provided, more broadly?
21 A. I'm sure there was but I wasn't party to those
22 discussions around the broader considerations
23 around training.
24 Q. I'm going to move on now to the issue of advice
25 and assistance. In a couple of the roles that

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1 Technology Transformation Programme, as it says
2 there. So this was looking at various
3 improvements to Horizon, at which compliance
4 training was one.
5 Q. If we look at page 18 of this document, I just
6 want to draw to your attention a couple of
7 entries in a table, it's the top table on
8 page 18. It says there "Project Sparrow
9 Recommendations"; do you know what Project
10 Sparrow was/is?
11 A. I believe that it was a project within Post
12 Office looking at discrepancies and ways to
13 identify them. I think, in terms of this
14 particular document, it was -- the Project
15 Sparrow was providing information, as
16 I understood it, on ways that the system could
17 be adapted to prevent branch mistakes or
18 discrepancies.
19 Q. Have you had any direct involvement with Project
20 Sparrow?
21 A. Other than their input into the documents as
22 reviewers, no.
23 Q. The issue identified there is:
24 "Postmasters do not have access to enough
25 training to feel competent in running their

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1 you've set out for us, you were advising
2 branches, to some extent, and assisting them
3 directly. Can you tell us what roles they were
4 and the level of your involvement directly with
5 branches?
6 A. Yeah, so in the NBSC, as I've already mentioned,
7 as an incident analyst you would sometimes be
8 called upon by a tier 2 adviser to support the
9 call that they were dealing with, so that was in
10 both my stints with -- within the NBSC, so from
11 1999 to 2001 and from 2003 to 2005 I would have
12 fulfilled that role.
13 Wider than that, in the network
14 co-ordination adviser role from 2005, I would
15 occasionally speak to branches, so this -- as
16 I mentioned earlier, we would deal with sort of
17 escalations from the service line where, for
18 example, transaction corrections needed chasing
19 up. So I'd deal with the branches directly with
20 that.
21 And then sort of from 2010 to 2016 when
22 I was in those data roles, that was with the
23 branch standards team, so we were making
24 outbound calls to branches about those various
25 compliance issues so, occasionally, I would

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1 interact with branches on those as well.
 2 **Q.** Can you tell us your view of the adequacy of
 3 support concerning issues such as balancing, in
 4 the early years of Horizon?
 5 **A.** Yeah, I think, speaking about the period when
 6 I was on the helpdesk on the NBSC as an incident
 7 analyst, I think it was a very difficult and
 8 challenging environment for the helpdesk. We
 9 were -- I think I mentioned this in my witness
 10 statement -- we were resourcing in line with the
 11 Horizon rollout and we were trying to resource
 12 to a central location, so that meant that,
 13 whereas the previous regional helplines would
 14 have had -- typically, the route into the
 15 previous regional helplines was through the
 16 Crown Network, so you kind of worked in branch
 17 for a number of years and then you went onto the
 18 regional helpline. We were recruiting and
 19 resourcing much more of a broad mix of
 20 individuals, so there was a steeper learning
 21 curve for some individuals, if you'd not had
 22 that branch experience.

23 And we were obviously dealing with new
 24 contractual relationships with Fujitsu around
 25 the HSD and the scope of that helpdesk. So

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1 were in a lot of ways quite complex to follow
 2 for branches and the preference was to pick up
 3 the phone and speak to the helpdesk.
 4 **Q.** But one thing you specifically highlighted in
 5 your witness statement relates to following the
 6 steps that are prescribed in a guide but even
 7 following those steps leading to an unexpected
 8 result; do you remember that?
 9 **A.** Yes.
 10 **Q.** Was that a common scenario?
 11 **A.** Yeah, I think it is -- it was basically because
 12 when you came to a position where you were
 13 trying to balance and perhaps you had
 14 a discrepancy, a loss or a gain, it was not
 15 always easy then to backtrack and find out where
 16 that had arisen. And, as I say, the sort of
 17 branches at least that I spoke to then preferred
 18 to just get on the phone and rather than going
 19 through some steps, which seemed to confuse
 20 them, they would just get on the phone and speak
 21 to the helpdesk instead.

22 **Q.** Moving on to Horizon Online and help with that,
 23 I think you've said that it has its own Help
 24 system. Can you tell us briefly about that?

25 **A.** Yeah. So prior to Horizon Online Help, if my

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1 I think it was -- we were going on the learning
 2 journey to some extent with the branches, as
 3 well, you know, it was tough.
 4 **Q.** You've also referred in your witness statement
 5 to booklets and guides and you say that they
 6 didn't provide branches with adequate tools, if
 7 they followed the steps but those steps led to
 8 unexpected results; do you recall that?
 9 **A.** Yeah, I mean, there was a couple of different
 10 communications and guides that the branches had
 11 access to. I think the one I particularly
 12 remember was the Horizon System User Guide which
 13 had a load of flowcharts in of various kind of
 14 processes that the branch was supposed to
 15 follow, and the feedback -- at least the
 16 branches that I spoke to -- about those guides
 17 was that they just preferred to speak to
 18 somebody on the helpdesk and they found them
 19 very difficult to navigate.

20 I think the Quick Reference Guide -- I don't
 21 remember when that came in but there was a kind
 22 of abridged version that kind of gave you the
 23 basic steps, particularly around balancing --
 24 was much more favourably received by branches
 25 but certainly, yeah, I would say that the guides

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1 recollection is correct, there were guides in
 2 the branches, counter operations manuals. So
 3 these were physical instruction guides,
 4 operational guidance. Horizon Online Help sort
 5 of digitised those and introduced a help
 6 mechanism that was available from the Horizon
 7 counter, so you could press a button on Horizon
 8 if you were stuck with something, and look up
 9 the process.

10 **Q.** It's something called Online Help, I think, is
 11 that the Horizon Online Help?

12 **A.** Yes.

13 **Q.** When was that introduced, was that from the
 14 beginning of Horizon Online or later?

15 **A.** I believe it was from the beginning in 2010.

16 **Q.** You've said in your statement that, although
 17 that was a step forward, it hasn't evolved. Can
 18 you help us with that, please?

19 **A.** Yes. So this was mainly in sort of reflecting
 20 upon a later project that I was involved in in
 21 2016, which was to look at improvements to that
 22 very Help system and, although it was a step
 23 forward in terms of digitising content, it meant
 24 that you didn't have to have people manually
 25 updating operation guides in the branch.

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1 I don't think that's been taken forward in
 2 the sense of providing easy and quick access to
 3 Help. So the help's there, the content is there
 4 on Horizon but it's about the speed at which
 5 a postmaster or branch can access it,
 6 particularly if they have a customer in front of
 7 them, and the fact that you kind of have to step
 8 out of the transaction that you're doing to kind
 9 of access the Help, rather than there being
 10 a kind of overlay of that Help that pops up in
 11 the corner.

12 Q. Is that still an issue?
 13 A. It is at the moment, yes.
 14 Q. Who currently is responsible for that?
 15 A. I believe it is being looked at as part of the
 16 replacement for Horizon.
 17 Q. Who in particular is responsible for that?
 18 A. The programme that is looking at the replacement
 19 for Horizon.
 20 Q. Is there a particular individual in charge of
 21 that programme?
 22 A. Well, it would sit under Zdravko(?) ** in Post
 23 Office terms.
 24 Q. Thank you. Can we look at POL00039359, please.
 25 It's the second page of that. It seems that in

29

1 the NBSC.
 2 Q. Is there, within the Post Office around this
 3 period, a general recognition that balancing was
 4 too complicated and that there were issues with
 5 balancing?
 6 A. At least in terms of my exposure to it, that was
 7 the kind of premise behind looking at balancing
 8 simplification.
 9 Q. Was there any reflection within the Post Office
 10 earlier than 2017 that that was something that
 11 should be simplified?
 12 A. Not in the roles that I was involved in.
 13 Q. Do you perceive that there has been a change in
 14 attitude within the Post Office, with regards to
 15 balancing and simplifying balancing?
 16 A. I think there has been a shift but I don't think
 17 it's sort of -- it's not led to material changes
 18 in Horizon Online at present.
 19 Q. I was going to say, as a result of this email,
 20 have you seen any material, significant material
 21 changes in simplifying the balancing process?
 22 A. Not the balancing process itself, not that
 23 I recall. I think some things have been taken
 24 forward so, for example, the ATM balancing
 25 process I think has had two stages of

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1 2017 there were efforts to simplify balancing.
 2 Can you tell us briefly about that, please?
 3 A. Yes, so --
 4 Q. It's the second page of that. Thank you.
 5 A. Yeah.
 6 Q. That's an email from yourself. Who is it to and
 7 what's the issue there?
 8 A. So there was a programme within Post Office at
 9 this time called STRN, which was, I think,
 10 Simpler To Run Network, and part of was to look
 11 at were there ways that we could simplify the
 12 balancing such that it was quicker and easier
 13 for postmasters.
 14 So I was involved in the sort of very early
 15 scoping of this programme, gathering feedback
 16 from stakeholders, and I think we investigated
 17 three areas, which were suspense account, ATM
 18 balancing and also the general sort of balancing
 19 steps. And this email is to Alison Clark, who
 20 worked, I think at the time, as an NBSC team
 21 leader, and I was trying to gather
 22 information -- we were trying to gather all the
 23 collateral together, essentially, all the
 24 documents we had on the balancing process. And
 25 this email was to gather that information from

30

1 improvement since this document was written,
 2 this email was written.
 3 Q. If we turn to page 1 of this document and it's
 4 the bottom of page 1, there's also reference to
 5 a "discrepancy diagnostics document". So it's
 6 the bottom of that page. Thank you. Is this
 7 something you're aware of?
 8 A. Not to my recollection, no.
 9 Q. No. What was EUHSP?
 10 A. That was the -- is that the Help -- I think if
 11 you can maybe just help me with a document.
 12 Q. Thank you. You can look in you witness
 13 statement, if you like, at the beginning you've
 14 provided, it says there "Enhanced User Help and
 15 Support Programme"?
 16 A. Okay, yeah.
 17 Q. Is that something you're familiar with?
 18 A. Yeah, so that was part of the BTTP programme
 19 which was looking at enhancements to Horizon in
 20 sort of 2016.
 21 Q. Did that go ahead?
 22 A. The Help specifically, the Help and Support?
 23 Q. Yes.
 24 A. No, it didn't.
 25 Q. Why not?

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1 A. So part of the process for all those initiatives
2 was to present to a senior user forum of what
3 the costs and benefits of that particular change
4 would be, in this case improvements to Help, and
5 it didn't get through that governance forum. It
6 wasn't signed off by that governance forum.
7 Q. Who is in charge of that governance forum, do
8 you know?
9 A. I believe at the time it was Gill Tait.
10 Q. From the look of the emails that I took you to
11 and reference to EUHSP, et cetera, it looks as
12 though there was some thinking, in 2016, 2017,
13 about how to provide more help to
14 subpostmasters. Are you aware of any concrete
15 significant projects that have gone ahead along
16 those lines?
17 A. I don't know whether -- I think it was to
18 provide quicker help to postmasters, not
19 necessarily more. I think, as I said, the
20 content is there. I think it's just about the
21 way that they access it. In terms of things
22 that have changed that help postmasters, there
23 has been some changes in more recent times. For
24 example, branch hub, which is a kind of digital
25 hub that postmasters can access, has access to

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1 and issues that Fujitsu were aware of, in terms
2 of HSD, and the Known Error Log was part of that
3 information share.

4 I believe it was a spreadsheet. As I've
5 said in my witness statement, I don't know
6 whether that was a full set of error logs or
7 whether it was a subset but I do recall seeing
8 a spreadsheet when I was working on NBSC.

9 Q. So this is '99 to 2001 or thereabouts?

10 A. No, I'd say it was later than that. I think in
11 my witness statement -- so it probably --
12 I mean, this is speculation because I don't
13 remember specifically but it feels like it was
14 in the later period, when I was -- was at
15 Network? So this would have been 2003, I think.
16 Around about that time.

17 Q. So 2003 onwards. How long were you in that
18 role? You were in that role until 2005, so 2003
19 to 2005 or did it extend that, to the best of
20 your recollection?

21 A. I'm not sure, given I left the role, I don't
22 know. And I don't know how frequently it was
23 shared.

24 Q. At the end of that period, there's something
25 called the Callendar Square bug and I'm going to

35

1 resources, knowledge articles, videos and the
2 like, downloadable guides, which are also
3 available on the learning management system that
4 we maintain. But, in terms of Help itself, the
5 Horizon Online Help, I'm not aware of any
6 significant changes to that content.

7 Q. I want to move on to the Known Error Log.
8 You've addressed the Known Error Log in your
9 witness statement.

10 A. Mm-hm.

11 Q. I think you said that your recollection is hazy.
12 Can you tell us what your recollection is of the
13 sharing of a Known Error Log between Fujitsu and
14 the Post Office during your involvement in those
15 matters?

16 A. Yeah, I don't think I can really go beyond what
17 I've said in the witness statement, which is
18 that there was a lot of activity at that time to
19 try to improve the working relationship,
20 operational relationship between NBSC and HSD to
21 prevent, for example, calls being bounced
22 between those two helpdesks. And my
23 recollection is that, as part of that, there was
24 some information sharing between the two
25 helpdesks of issues that the NBSC were aware of

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1 move on now to the Callendar Square bug. That
2 first presented in October or September 2005?

3 A. Yeah.

4 Q. Do you recall how you first found out about the
5 Callendar Square bug?

6 A. From the service manager who'd been speaking to
7 the branch.

8 Q. Who was the service manager?

9 A. Sandra MacKay.

10 Q. Can we look at FUJ00083812. When you say Sandra
11 MacKay was the service manager, what do you mean
12 by "service manager"? Can you tell us a little
13 bit about that role, please?

14 A. Yeah, I think I explained earlier that in the
15 early -- sort of 2005 or thereabouts, the Retail
16 Line did split, so into Sales and Service, that
17 the sales managers would deal with generating
18 sales and coaching on sales in the branch.
19 Anything else that wasn't sales was referred to
20 an area intervention office and they had various
21 service managers who worked out of that area
22 intervention office and Sandra MacKay was one of
23 those.

24 So this was dealing with any issues that
25 were not directly related to sales and they

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1 would contact branches or they would go out and
 2 visit branches to investigate and resolve those
 3 issues.
 4 **Q.** Were they in charge of particular regions or was
 5 it all centralised?
 6 **A.** The area intervention offices themselves were in
 7 designated regions but it could be any of the
 8 service managers that went out to a particular
 9 branch for that area intervention office.
 10 **Q.** Do you remember Sandra MacKay being in charge of
 11 any particular region?
 12 **A.** I don't.
 13 **Q.** There's mention there of Callendar Square,
 14 7 October 2005. Can you tell us what is this
 15 log because we're going to see a few of them?
 16 **A.** This is a standard log that was completed by
 17 service managers for any interactions with
 18 branches. That might be a visit, it might be
 19 a call.
 20 **Q.** What would happen to those logs?
 21 **A.** They would get stored against the branch record
 22 on the electronic filing cabinet, I believe it
 23 was called.
 24 **Q.** Can we go to the second page. I'm going to read
 25 to you a little bit from that entry. It says:

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1 **A.** At that time I was in the network co-ordination
 2 role. So if there were issues, not necessarily
 3 related just to issues with Horizon but any sort
 4 of issues that required the input of other
 5 stakeholders within the business outside of
 6 Service, it would be referred to myself or one
 7 of my colleagues to kind of chase up or
 8 escalate.
 9 **Q.** Chase up or escalate with who?
 10 **A.** In this particular case, it would typically
 11 be -- well, it depends. If we could resolve the
 12 issue through Fujitsu taking ownership and
 13 fixing the problem, it would be that route. If
 14 it was -- if we felt it was a wider or more
 15 significant problem, then we would raise it
 16 through to the Problem Management Team.
 17 **Q.** To who, sorry?
 18 **A.** To the Problem Management Team.
 19 **Q.** Who was in charge of the Problem Management
 20 Team?
 21 **A.** Not sure at this point. I think it was later
 22 Dave Hulbert. But I don't know at this
 23 particular point in time.
 24 **Q.** After your name is mentioned there, it says:
 25 "... meanwhile the office should continue to

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1 "Expand on any letter requested ..."
 2 So this is the entry on the log. It says:
 3 "Telephoned Alan [I think Alan is the
 4 subpostmaster] as requested. He is concerned
 5 that he has still not heard anything regarding
 6 the loss that he is rolling. I told him that
 7 I had now involved the C&SM ..."
 8 Who was the C&SM?
 9 **A.** I don't remember what the job title -- it may be
 10 contracts and service manager. I think that
 11 would be Sandra's boss.
 12 **Q.** Thank you:
 13 "... who in turn has contacted Andy."
 14 Who is Andy?
 15 **A.** I think Andy Bayfield.
 16 **Q.** Thank you. And what was his role?
 17 **A.** I think he was the sort of regional service
 18 manager, so this -- he would have been the
 19 C&SM's line manager.
 20 **Q.** "I agreed that I would make some enquiries and
 21 let him know my findings. I discussed this with
 22 Andy who has agreed to send another email
 23 relating to the shortfall due to the Horizon
 24 failure to Shaun Turner ..."
 25 Why are you being mentioned there?

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1 roll the loss."
 2 Can you explain to us what "roll the loss"
 3 means?
 4 **A.** My take on this is that it means not bringing
 5 the loss to account while it is investigated.
 6 **Q.** Was that common advice that the NBSC or others
 7 gave to subpostmasters if there was a problem?
 8 **A.** I don't know about the NBSC, but it -- I don't
 9 think it would be uncommon for a service manager
 10 to advise that while something was being
 11 investigated.
 12 **Q.** Typically, how long would somebody roll the loss
 13 for?
 14 **A.** I don't think there was some specific period of
 15 time. It would depend on how long the
 16 investigation takes.
 17 **Q.** If the investigation takes quite a while, might
 18 it be that a subpostmaster is asked to roll the
 19 loss for quite a significant period of time?
 20 **A.** It could be.
 21 **Q.** Can we look at FUJ00083815, please. Sorry,
 22 that's the same document. Can we look at
 23 FUJ00083664.
 24 Now, this is a significant email chain. I'm
 25 going to start at the back so I'm going to start

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1 at page 6 of that chain. Thank you very much.
 2 So we're here on 11 January 2006. It's an email
 3 from Sandra MacKay to yourself. What was your
 4 position at this time?
 5 **A.** I was still in the network co-ordination role.
 6 **Q.** Thank you. I'm just going to read that email.
 7 It says:
 8 "You may recall that in September the above
 9 office had major problems with their Horizon
 10 System relating to transfers between stock
 11 units."
 12 So September, that's the reference, really,
 13 to the document we've seen just now, isn't it?
 14 **A.** Yes, it is.
 15 **Q.** We're now in January:
 16 "The [subpostmaster] has reported that he is
 17 again experiencing problems with transfers,
 18 ([5 January 2006]) which resulted in a loss of
 19 around [£43,000] which has subsequently
 20 rectified itself."
 21 £43,000, would that have struck you as
 22 a significant sum or was that typical?
 23 **A.** An alarming sum, I would say, yeah. It would
 24 have struck me as significant.
 25 **Q.** "I know that the [subpostmaster] has reported
 41

1 a wider problem than an individual branch, or?
 2 **A.** Not necessarily. But a system issue -- an issue
 3 with the Horizon System not functioning as it
 4 should.
 5 **Q.** Rather than, say, a hardware problem?
 6 **A.** Yes.
 7 **Q.** Could we scroll up and look at the email above.
 8 This is an email from Brian Trotter to yourself.
 9 Who was Brian Trotter?
 10 **A.** I believe at this point he was Sandra's boss so
 11 the C&SM who was referred to earlier.
 12 **Q.** He says:
 13 "Further to Sandra's email, I visited the
 14 branch with Sandra last week and the
 15 [subpostmaster] provided clear documented
 16 evidence that something very wrong is occurring
 17 with some of the processors when carrying out
 18 transfers between stock units. To be absolutely
 19 sure from our side can we either carry out
 20 a thorough check of the alleged faulty
 21 processors or swap them out."
 22 Can we turn to the email above that, please,
 23 so that's page 5. We have here your response --
 24 sorry, your email to Gary Blackburn.
 25 **A.** Yeah.

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1 this to Horizon Support ..."
 2 Horizon Support, who was that? Was that
 3 Fujitsu or was that yourselves?
 4 **A.** No, I take that to mean HSD.
 5 **Q.** Thank you:
 6 "... who have come back to him stating that
 7 they cannot find any problem.
 8 "Clearly the [subpostmaster] is concerned as
 9 we have just dispute number of months trying to
 10 sort out the first instance and he doesn't want
 11 a repeat performance. He is convinced that
 12 there is something wrong with his Horizon kit.
 13 I would be grateful if you could investigate
 14 this and give him any support that you can. I'm
 15 due to visit the office tomorrow to have a look
 16 at his paperwork and discuss the situation with
 17 him."
 18 Why were you, in particular, being contacted
 19 about this problem?
 20 **A.** Firstly, because it had happened before and it
 21 appeared to be a system issue and, if it was
 22 a system issue, it was important to get that --
 23 give that visibility to the Problem Management
 24 Team.
 25 **Q.** When you say a "system issue", do you mean
 42

1 **Q.** I think you've mentioned Gary Blackburn. Who
 2 was he?
 3 **A.** Gary Blackburn was in the Problem Management
 4 Team in Post Office.
 5 **Q.** You're forwarding the issue to him and you say
 6 there:
 7 "Gary,
 8 "Need your advice on this branch. There
 9 appears to be an ongoing problem at this branch
 10 with transfers between SUs causing a receipts
 11 and payments mismatch. This first came to my
 12 attention some 3 or 4 months ago, when the
 13 branch was chasing up an error notice to account
 14 for loss [et cetera]."
 15 Can we look at the final paragraph there, it
 16 says:
 17 "Since then it appeared to have happened
 18 again, although Fujitsu are saying no issue
 19 could be detected. I am concerned that there is
 20 a fundamental flaw with the branch's
 21 configuration, and would be interested to know
 22 how FS ..."
 23 That's Fujitsu Services, is it?
 24 **A.** That's correct, yes.
 25 **Q.** "... put the first issue to bed."

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1 So what did you believe you were doing in
2 that email? Were you escalating the matter,
3 raising it with somebody who would speak to
4 Fujitsu, or what was the purpose?

5 **A.** I was trying to firstly understand what was
6 happening in the branch and I thought Gary would
7 be able to assist me with that because he had
8 contacts in Fujitsu that I didn't have access
9 to.

10 Secondly, I'm trying to get to a position
11 where we can fix this for the branch, given it
12 appears to have happened in September and then
13 repeated in January.

14 **Q.** Can we scroll up, please, to page 4. There is
15 an email from Liz Evans-Jones to Gary Blackburn.
16 Now, Liz Evans-Jones seems to be from Fujitsu;
17 is that somebody you were familiar with?

18 **A.** Only in passing but, yeah, I believe she was
19 a Fujitsu problem manager, so Gary's
20 counterpart.

21 **Q.** So she would be a direct person to speak to in
22 relation to a bug in Horizon?

23 **A.** For Gary, yeah.

24 **Q.** For Gary. She says there:
25 "Hi Gary,

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1 questions occur:
2 "Do we understand why this particular branch
3 has been having problems? Or are there any
4 branches in the network that have been having
5 this problem?"

6 "Can the branch be front ended on the
7 counter release of S90 such that it gets a fix
8 as soon as possible?"

9 "The email from Liz suggests that there may
10 be a recurrence following S90. What degree of
11 certainty do we have that it will definitely be
12 fixed?"

13 I mean, you've said that the amount, the
14 £43,000, is an alarming amount of money.

15 **A.** Mm.

16 **Q.** Were you concerned at this stage about
17 recurrences?

18 **A.** I was concerned to make sure that the S90
19 release was going to fix it and I was concerned
20 to make sure, as indicated by my question there,
21 that this was, as I believed it to be, a single
22 branch that was having this problem.

23 **Q.** Can we look at POL00081928, please. It's page 6
24 that I'd like to begin. Thank you. This was
25 an email from Anne Chambers. Who was Anne

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1 "I have checked the call and this issue is
2 scheduled to be resolved in S90.
3 "S90 has already been deployed to the
4 Datacentre and counter release is scheduled to
5 start on [4 March 2006] due for completion
6 [14 April 2006]."

7 Now, that response is sent to you. Why were
8 you being kept in the loop in relation to this
9 issue?

10 **A.** So that I could keep the service manager in the
11 loop and therefore the branch.

12 **Q.** Did you at this stage think that it might be
13 a wider problem than just this one branch?

14 **A.** Not at this stage, I had no reason to suspect
15 that.

16 **Q.** Can we scroll up to page 3, please. So we have
17 there:
18 "Shaun
19 "S90 fix for this problem, in the interim TC
20 correction will have to continue. Let me know
21 if you need any further assistance."
22 Then we have an email from yourself to Gary
23 Blackburn, saying:
24 "Gary,
25 "Thanks for looking into this ... Couple of

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1 Chambers?
2 **A.** I believe that she worked within Fujitsu on the
3 second or third line support.
4 **Q.** And Mike Stewart?
5 **A.** I don't know who Mike was.
6 **Q.** This is 23 February 2006, and this email isn't
7 copied to you originally but it is subsequently
8 forwarded to you; have you seen that?
9 **A.** I have.
10 **Q.** I'm going to read to you briefly from Anne
11 Chambers' email. If we could scroll down
12 slightly, it says:
13 "Haven't looked at the recent evidence, but
14 I know in the past this site had hit this
15 Riposte lock problem 2 or 3 times within a few
16 weeks. This problem has been around for years
17 and affects a number of sites most weeks, and
18 finally Escher say they have done something
19 about it. I am interested in whether they
20 really have fixed it which [is] why I left the
21 call open -- to remind me to check over the
22 whole estate once S90 is live -- call me cynical
23 but I do not just accept a 3rd party's word that
24 they have fixed something!"
25 Further down in that email, she says:

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1 "Please note that KELs tell SMC that they
2 must contact sites and warn them of balancing
3 problems if they notice the event storms caused
4 by the held lock, and advise them to reboot the
5 affected counter before continuing with the
6 balance. Unfortunately in practice it seems to
7 take SMC several hours to notice these storms by
8 which time the damage may have been done."

9 Were you aware of this problem at the time,
10 the significance of this issue?

11 A. I don't recall reading this email. I mean, it
12 was copied to me, so I may have seen it.
13 I certainly didn't pick up on the significance
14 at the time. My main focus was getting the
15 branch or branches that were impacted by this
16 fixed, which was going to be done shortly
17 through the S90 release.

18 Q. Having heard about the Callendar Square incident
19 and the £43,000, having thought that it was
20 likely to have only related to one particular
21 branch, might this not have struck you as quite
22 concerning at the time and something really that
23 should be raised to quite a significant level
24 within the Post Office?

25 A. I regret not being more curious about that, the

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1 Q. It says at the bottom there:

2 "Please note that KELs tell SMC that they
3 must contact sites and warn them of balancing
4 problems if they notice the event storms caused
5 by the held lock ..."

6 Do you know how event storms would be
7 noticed?

8 A. I don't. That's the other thing about this
9 email. There's some technical content that was
10 beyond my ken.

11 Q. Do you know what an event storm is?

12 A. I don't.

13 Q. How, at this time, did you believe a bug such as
14 this would be known to the wider Post Office
15 community, whether it's branches or within Post
16 Office itself?

17 A. At this time, my assumption was there were two
18 things that would -- two processes that would
19 surface a bug like this. One would be receipts
20 and payments mismatch messages in the branch and
21 the other would be Fujitsu monitoring.

22 Q. Was your belief that Fujitsu monitoring was
23 infallible?

24 A. Not infallible but I thought they had robust
25 monitoring in place and if a branch contacted

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1 line where it is said that it is affecting
2 several sites a week. But I think at the time,
3 if I'd have read that, I would have assumed that
4 this was being managed through the sort of cross
5 to main problem management space, especially
6 since Gary and Lynne were on the circulation.

7 Q. You had been on the distribution list of this,
8 and you were also copied in or sent emails in
9 the early days. I mean, dating back to 2005,
10 you were involved in the Callendar Square
11 incident. Is there a reason why it didn't
12 strike you at the time as something more
13 significant?

14 A. I think, as I say, my focus was to make sure
15 that the branch issue was fixed. I was told
16 that was being done as part of the S90 release.
17 My accountability, therefore, was to push that
18 forward to the service manager, so that they
19 could keep the branch up to date. In terms of
20 this particular aspect, I would have expected
21 that to be being, you know, the wider sort of
22 branch impact, if there were other branches that
23 were being impacted by this error, to be managed
24 and monitored through the problem management
25 process.

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1 them, they would seek to replicate that, and if
2 it wasn't included in their existing monitoring
3 processes, that it would be added.

4 Q. If a branch didn't contact them, because they
5 didn't know about the problem or didn't connect
6 the dots, how would they have found out about
7 the problem?

8 A. Yeah, that's a fair point. I don't know. If
9 there's no monitoring in place and the branch
10 doesn't contact them, it seems to me that they
11 wouldn't know about it.

12 Q. If we scroll up to page 5, we have the email to
13 yourself from Gary Blackburn. It's the top
14 email on page 5, please -- thank you -- sent to
15 you on 1 March 2006:

16 "Shaun

17 "It appears that Callendar Square is not
18 alone with its mismatch problem. It also
19 appears that Fujitsu are expecting S90 release
20 to resolve this quirk.

21 "We have opened a cross-domain problem
22 record. Lynne Fallowfield is the contact."

23 Who was Lynne Fallowfield?

24 A. She was a colleague of Gary Blackburn's in
25 Problem Management.

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1 Q. Thank you. So it's not just a matter of Anne
2 Chambers' email being forwarded to you amongst
3 a large distribution list, or anything along
4 those lines. I mean, it is being sent to you as
5 the sole recipient by Gary Blackburn, telling
6 you here that Callendar Square isn't alone with
7 the mismatch problem. Again, would it not have
8 struck you as significant?

9 A. As I say, the key thing for me was getting the
10 branch or branches that were impacted, the
11 situation fixed, and I was being told that that
12 would be implemented with the S90 release and,
13 as I previously mentioned, my feeling at this
14 time was that Fujitsu had adequate monitoring in
15 place to identify these branches.

16 Q. But weren't you also being told by Fujitsu, that
17 is Anne Chambers' email, that she's a little
18 sceptical of the fix?

19 A. Yes, yeah. I would expect post-S90 monitoring
20 to be in place to prove that the fix had worked.
21 That was normally part of the standard problem
22 management process, in my experience.

23 Q. Was it your experience that somebody from
24 Fujitsu would put in an email that they were
25 sceptical about their own fix?

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1 yeah.

2 Q. Were, as far as you're aware, messages being
3 cascaded across the network to branches about
4 a problem that affects balancing?

5 A. Not to my recollection there weren't, no.

6 Q. Who was responsible for passing the information
7 to branches that didn't call the helpline?

8 A. Once something like this was accepted as
9 a problem, the Problem Management Team would
10 consider what communications were required both
11 to internal stakeholders and to branches, so
12 I would see it as their accountability to make
13 that judgement.

14 Q. We're talking about a problem that's gone on for
15 years and that, as you have said -- I mean, in
16 the Callendar Square case, £43,000, significant
17 sum. Who do you think, in Post Office, was
18 responsible for making that message more widely
19 known?

20 A. As I say, I think that would be the Problem
21 Management Team.

22 Q. So that's a team. Who in particular?

23 A. I'm not sure who was heading up that area at
24 this time, but whoever is managing that
25 problem -- in this case Lynne Fallowfield in

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1 A. I'd not seen that before. I don't think I ever
2 saw it again.

3 Q. Can we look at page 4, please. There's an email
4 from you to Sandra MacKay and to Brian Trotter,
5 and you say there:

6 "As you can see from the email below though,
7 there is now recognition that this is a wider
8 issue than just a software 'quirk' at just one
9 branch, which means it is now being actively
10 managed as a cross-domain problem within
11 Fujitsu."

12 Why were you sending the email to them?

13 A. Predominantly to -- so that they could update
14 Callendar Square.

15 Q. So we know that this problem has been going on
16 at Callendar Square since September 2005. We
17 know that the software release S90 is going to
18 take place in April 2006. But we know that
19 there are concerns about it still existing after
20 the software fix. We know also now that it
21 affects more than one branch. There seems to be
22 in this chain a bit of a lack of urgency with
23 regards to this particular problem; would you
24 agree with that?

25 A. I think things could have been done quicker,

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1 consultation with her seniors -- would need to
2 make that judgement based on the number of
3 impacted branches and the likely fix time.

4 Q. Did you ever have a conversation with her about
5 it?

6 A. Not to my recollection, no.

7 Q. Who was responsible for telling auditors about
8 this problem?

9 A. Again, I would see that coming through the
10 Problem Management Team. They should be
11 considering internal stakeholders and branch
12 communications.

13 Q. Who was responsible for telling investigators
14 and prosecutors about this problem?

15 A. The same.

16 Q. Were there policies and procedures in place for
17 them to have raised the issue with auditors,
18 investigators, prosecutors?

19 A. I was never part of the Problem Management Team
20 but I believe there were processes that they
21 could follow to determine who they should be
22 communicating to. That was my understanding as
23 an outsider to that team.

24 Q. As someone who had spent a considerable part of
25 your career analysing data and analysing trends,

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1 was the issue that was being raised here -- so
2 more than one branch, number of years -- was
3 that something that you would have considered to
4 be significant?

5 **A.** Yeah, I think in the moment, yeah, it's
6 significant, which is why I was asking those
7 questions. But I think I would have seen it --
8 I think from the documentation that we saw
9 earlier, the email was suggesting that the S90
10 release was imminent in March 2006. So that
11 would have been my focus at this time, to get
12 the branch situation fixed.

13 **Q.** So I think the software fix wouldn't be complete
14 until April 2006. It's been going on, at least
15 from the Callendar Square incident, since
16 September 2005. Did you consider the historic
17 position, looking back, even if it is soon to be
18 fixed, albeit in a couple of months' time, what
19 about all those branches that were affected over
20 the course of that year?

21 **A.** As I say, I would have expected that to come
22 through Fujitsu monitoring and be raised. If
23 there were incidents earlier than Callendar
24 Square, I would have expected that to have been
25 monitored by Fujitsu and raised as a problem by

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1 **A.** Yeah, I don't remember receiving this particular
2 email prior to getting the pack, the bundle.
3 But, yeah, I can see that I was sent the email
4 and I think Lynne responded with some details of
5 those four branches.
6 **Q.** Can you think of why, in December 2006, you
7 would still be being sent emails related to
8 Callendar Square?
9 **A.** I think it is because there was previous
10 correspondence between Mandy Talbot and Lesley
11 Joyce where the visit logs were sent, and
12 I presume from the content of this email that
13 Mandy Talbot may have seen the emails that were
14 sent back and forth at that time and that's
15 why -- my name is on those, so that's why she's
16 sort of send out a sort of blanket email.

17 **Q.** Was the Callendar Square bug still something
18 that was bubbling away in December 2006?

19 **A.** Not in my world it wasn't, no.

20 **Q.** Do you believe it was or wasn't?

21 **A.** I believed it had been fixed by S90.

22 **Q.** Did you check that it had been fixed by S90?

23 **A.** I don't recall checking. That's not to say it
24 didn't happen. I would have expected, as
25 a matter of course, where I'd raised a problem

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1 them earlier. I had no reason at that stage to
2 believe that wasn't happening.

3 **Q.** Raised with who?

4 **A.** Raised -- so the Fujitsu Problem Management Team
5 should raise it to the POL Problem Management
6 Team, across the main problem.

7 **Q.** Can we look at POL00070134. We're now on
8 6 December 2006 and there is an email, the
9 subject of which is "Callendar Square URGENT".
10 You are a recipient of that email, from Mandy
11 Talbot, Dispute Resolution. She says there:

12 "In [February] of this year you wrote to
13 Gary Blackburn and he wrote to Shaun Turner and
14 then Sandra MacKay about these branches which
15 had apparently registered complaints about the
16 HORIZON system. Fujitsu have told us that in
17 respect of Callendar Square that there was
18 a problem when stock was transferred from one
19 stock unit to another but this would any apply
20 when there was more than one stock unit, ie more
21 than one position at the counter."

22 So it seems as though, even in December
23 2006, you were still being sent emails relating
24 to the Callendar Square. Do you remember that
25 at all?

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1 with the Problem Management Team to be notified
2 that it had been successfully resolved.

3 **Q.** So you would have expected the Problem
4 Management Team to have kept a tab on whether
5 S90 had fixed the problem or not?

6 **A.** Yeah, once they'd got it across the main problem
7 record, that's the purpose, is to manage that
8 through and ensure that it's resolved or
9 mitigated.

10 **Q.** Given the significance, the sums involved, the
11 length of time that it was happening, are you
12 aware and did you keep tabs on whether any
13 significant investigation had taken place into
14 whether S90 fixed it?

15 **A.** I don't recall doing that but that's not to say
16 that I wasn't speaking to Gary and Lynne about
17 this post the implementation of S90.

18 **Q.** Having been quite a significant issue at the
19 time, significant in number, significant in
20 effect, is there a reason why you can't remember
21 whether you did or didn't?

22 **A.** I don't know what to say to that. I can't
23 remember. So ...

24 **Q.** Was it not significant for you?

25 **A.** No, it was. It was significant. But I don't

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1 remember -- I believe subsequently, from the GLO
2 findings, that it was fixed in S90. That's my
3 understanding. But I don't remember speaking to
4 Problem Management -- I would have expected --
5 that would have been my expected process at that
6 time for something like this, and I can only
7 assume that, if I had spoken to them, I would
8 have been told that it had been fixed in S90.

9 **Q.** You had previously been responsible as network
10 conformance and capacity manager and looking
11 into things like error rates and conformance.
12 Had you come across similar issues to this one
13 in that role?

14 **A.** No, not really, because when we're talking about
15 error rates in that role, it's not branch
16 balancing issues; it's more presentational
17 issues or it may be not correctly sizing
18 parcels, so it's not specifically related to the
19 balancing process.

20 **Q.** How about as network co-ordination adviser?
21 Were you coming across similar issues to the
22 Callendar Square issue?

23 **A.** No, not typically, no. There were escalations
24 to me about Horizon Issues but, typically, it
25 was more things like engineers not being sent

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1 "... it may be that you might have to do
2 a repeat performance tomorrow once the FAD codes
3 had been identified and the name of the branches
4 revealed", et cetera.

5 The second paragraph is the one I want to
6 draw your attention to. It says:

7 "Stephen and Richard our legal team at the
8 Court will be doing their best to persuade the
9 Court not to allow Castleton ..."

10 That refers to Lee Castleton. Are you aware
11 of a Lee Castleton case?

12 **A.** Any in passing, yes, I believe it was Marine
13 Drive Post Office, I think. But not at this
14 stage, I wouldn't have been aware.

15 **Q.** So on 6 December 2006, when you're -- the email
16 that was sent to you is being forwarded, you
17 weren't involved in the Lee Castleton case in
18 any way?

19 **A.** No.

20 **Q.** Thank you. I'll just continue that email. It
21 says:

22 "... to call this evidence because it is
23 failed late and does not relate to the problems
24 at his branch office. If they are successful
25 there will be no need to progress any further

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1 out on time, where I needed to chase them up.

2 This was fairly unique.

3 **MR BLAKE:** Thank you.

4 Sir, it may be an appropriate time now to
5 take our mid-morning break.

6 **SIR WYN WILLIAMS:** By all means, that's fine.

7 **MR BLAKE:** Thank you very much, could we take
8 15 minutes, which --

9 **SIR WYN WILLIAMS:** Yes, 11.35?

10 **MR BLAKE:** Thank you very much.

11 **SIR WYN WILLIAMS:** Thank you.

12 (11.20 am)

(A short break)

14 (11.38 am)

15 **MR BLAKE:** Thank you, Chair. Can we bring up
16 POL00070133, please. Now, at the bottom of this
17 page, there is that email I took you to just
18 before the break, but then that email is
19 forwarded by Mandy Talbot to somebody called
20 Steve Parker, do you know who Steve Parker is,
21 was?

22 **A.** Other than he worked in Fujitsu, no.

23 **Q.** Yes. As you say, he worked for Fujitsu, and it
24 says that he's been copied into an email
25 because:

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1 with these investigations but as Castleton is
2 a litigant in person it is common for Judges to
3 be sympathetic and may allow him to rely on his
4 evidence. If so you will have to pull out all
5 the stops to investigate what if anything went
6 wrong at these branches and why we can
7 distinguish them from Mr Castleton at Marine
8 Drive."

9 So it seems as though the Callendar Square
10 case is being used potentially as an example of
11 an issue with Horizon in the Castleton
12 proceedings; is that a fair interpretation or
13 your interpretation of that email?

14 **A.** That's a fair interpretation, I would say.

15 **Q.** Yes. Were you asked about the Callendar Square
16 bug in December 2006 by anybody?

17 **A.** Other than the email we've seen from Mandy
18 Talbot, no.

19 **Q.** Did you know about the context in which that
20 email had been sent, relating to the Lee
21 Castleton case?

22 **A.** Other than what is the content of the email,
23 that's all I would have known at that stage.

24 **Q.** So you wouldn't have had a conversation with
25 Mandy Talbot or anybody else on that bottom

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1 email about why Callendar Square is being raised
 2 now?
 3 **A.** No.
 4 **Q.** What was the relationship like between those who
 5 worked in NBSC and those who were involved in
 6 court cases, be they investigators or
 7 prosecutors or the legal team?
 8 **A.** In my experience, rather distant. I don't
 9 recall any specific interactions with
 10 investigations. They were a little bit further
 11 down the line than where you'd be involved with
 12 NBSC in dealing with branches.
 13 **Q.** Would those in the NBSC ever be asked about
 14 common problems with Horizon or bugs, errors or
 15 defects?
 16 **A.** Not to my recollection. You mean by
 17 investigation specifically or technically?
 18 **Q.** We see here, for example, Mandy Talbot and
 19 Fujitsu in correspondence about ongoing
 20 proceedings and that relates to, or in some way
 21 relates to, the Callendar Square incident. Was
 22 there ever any discussion, to the best of your
 23 recollection, with those kinds of people or
 24 anybody else involved in court proceedings and
 25 people who worked on the NBSC about bugs, errors

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1 **Q.** Do you recall any pressures to get on with
 2 Horizon Online, following delays alongside these
 3 possible profitability issues?
 4 **A.** Not specifically, no. But then I wasn't
 5 connected to the programme directly; I wasn't
 6 working on the Horizon Online programme.
 7 **Q.** Can we look at POL00028838, please. This is the
 8 issue that I'd like to ask you about. It's a
 9 "Receipts/Payments Mismatch issue". We can see
 10 that at the top. You're not listed there as
 11 an attendee of this meeting, you are
 12 mentioned -- I know you're aware of this a bit
 13 later on in this document, but let's see where
 14 we get to with looking at this page. So it
 15 says:
 16 "What is the issue?
 17 "Discrepancies showing at the Horizon
 18 counter disappear when the branch follows
 19 certain process steps, but will still show
 20 within the back end branch account. This is
 21 currently impacting circa 40 Branches since
 22 migration on to Horizon Online, with an overall
 23 cash value of circa £20,000 loss. This issue
 24 will only occur if a branch cancels the
 25 completion of the trading period, but within the

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1 or defects within Horizon?
 2 **A.** No, not to my recollection, no.
 3 **Q.** I'm going to now ask you about another bug and
 4 now we're moving on to Horizon Online. Can we
 5 look at POL00034433, please. Before we go on to
 6 that particular bug, I just want to ask you,
 7 this is a document that concerns Horizon Online
 8 migration and it seems to have been written by
 9 yourself or it's got your name in the bottom
 10 left-hand corner. Is this a document you
 11 recollect?
 12 **A.** Only after having seen the bundle. I didn't
 13 recollect it before but it does appear that I'm
 14 the author of it, yes.
 15 **Q.** In the first paragraph there it says:
 16 "The delivery of Horizon Online is a key
 17 business strategy in delivering some of the cost
 18 savings that underpin bringing the business back
 19 into profit by 2011."
 20 Do you recall at this stage, so 2010, 2011,
 21 there being financial pressures at the Post
 22 Office?
 23 **A.** In general terms, yes. But I -- in terms of the
 24 business benefits of Horizon Online
 25 specifically, I don't recall.

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1 same session continues to roll into a new
 2 balance period."
 3 Is this something you recall at all at the
 4 time? So we're here now in 2010.
 5 **A.** Yeah, this was in the additional documents
 6 bundle that I received, and I think I also saw
 7 this in some previous evidence -- it may have
 8 been by John Simpkins -- and, at that point,
 9 I did recall there being some issue that I was
 10 advised of in 2010. Specifically, I remember it
 11 because it was in the very early days Horizon
 12 Online but, beyond that, in terms of the nature
 13 and the number of branches and what the specific
 14 underlying technical problems were, I don't
 15 remember anything.
 16 **Q.** It says below that:
 17 "At this time we have not communicated with
 18 branches affected and we do not believe they are
 19 exploiting this bug intentionally."
 20 Now, you're somebody who has spent your
 21 whole career at the Post Office. Are you aware
 22 of branches not being told about bugs dependent
 23 on whether or not they are using it
 24 intentionally, exploiting it intentionally.
 25 **A.** Only from my experience of the Callendar Square

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1 bug. I don't believe there was a wider
2 communication on that to branches.
3 **Q.** But it seems from the wording here that it's not
4 being communicating because it's not being
5 exploited intentionally and they would only
6 communicate if it was exploiting the bug
7 intentionally. Do you think I've misread that
8 or do you think that is a fair reading of that
9 sentence?
10 **A.** Yeah, I mean, I think that's a reasonable
11 reading of that sentence, yeah.
12 **Q.** Do you think that the Post Office was better at
13 communicating with branches, in respect of bugs,
14 errors or defects, if the Post Office felt that
15 such bug, error or defect was being exploited
16 intentionally?
17 **A.** I think my experience with bugs is -- it's sort
18 of limited that I wouldn't want to make that
19 judgement call more generally. I can only go on
20 where I've been involved.
21 **Q.** From your experience, was the Post Office better
22 at communicating with branches, where the Post
23 Office had something to lose?
24 **A.** No, I don't think so. As I say, I've not been
25 involved in communications or these decisions

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1 confidence in the Horizon System.
2 **A.** That as a general theme, yes, I was aware of,
3 yes, and I would say that is the case in my
4 experience.
5 **Q.** Can you tell us how you got that impression?
6 **A.** Largely from the messaging that was coming out
7 from the business, particularly in the sort of
8 post-2009 period, around the robust nature of
9 the Horizon System, which does lead to
10 particular sensitivities around any issues or
11 any perceived issues with the Horizon System.
12 **Q.** We know in 2009 there was the *Computer Weekly*
13 article, for example. Was that the driver or
14 was there some other driver?
15 **A.** From my recollection, I think it was the
16 *Computer Weekly* and, you know, the early days of
17 the Justice for Subpostmasters, were certainly
18 things that were mentioned in the business and
19 where messaging was coming out to internal staff
20 like myself, around the sort of robust nature of
21 Horizon.
22 **Q.** Where was that messaging coming from?
23 **A.** I don't remember specifically but senior
24 leaders.
25 **Q.** When you, say "senior leaders", do you mean

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1 and it seems to me you're asking about what
2 underpins certain communication decisions, which
3 I've not been party to.
4 **Q.** It then goes on to say:
5 "The problem occurs as part of the process
6 when moving discrepancies on the Horizon System
7 into Local Suspense."
8 Can we turn over the page, please. Page 2,
9 it talks about the impact and it has some bullet
10 points at the bottom of that page. The impact
11 is:
12 "The branch has appeared to have balanced,
13 whereas in fact they could have a loss or
14 a gain."
15 So that's one of the fundamental uses that
16 this Inquiry is looking into. It says:
17 "Our accounting systems will be out of sync
18 with what is recorded at the branch."
19 "If widely known could cause a loss of
20 confidence in the Horizon System by branches."
21 Again, is that something you were aware of
22 from your long experience within the Post
23 Office, that there is a concern in the Post
24 Office, certainly at this time, that by
25 spreading the word there would be a loss of

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1 Chief Executive level or below that?
2 **A.** I don't think I can say for certain but, you
3 know, I was a recipient of some of that
4 messaging as it came down the chain and my
5 impression was that that was coming from senior
6 leadership.
7 **Q.** Can you clarify just so that we know who you
8 mean by senior leadership?
9 **A.** I guess in my area it would be a couple or three
10 rungs up the ladder from my direct line manager.
11 But I would imagine that messaging was coming
12 from board level down.
13 **Q.** When you say some way up from your level, can
14 you give a name?
15 **A.** I don't know, at that stage. I can't remember
16 the structure.
17 **Q.** Board level, though, again, Chief Executive
18 level?
19 **A.** That -- this was my impression of where the
20 messaging was coming from. We received it down
21 the management line.
22 **Q.** But your impression was it was coming from Chief
23 Executive level?
24 **A.** That was my impression, yeah. It was
25 a significant concern within the business, so my

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1 impression would be that that would be coming
2 from senior leaders within the business.
3 **Q.** "Potential impact upon ongoing legal cases where
4 branches are disputing the integrity of Horizon
5 Data."

6 Again, was that something you were aware of?

7 **A.** Yeah.

8 **Q.** So you mention the concern arising, for example,
9 from the *Computer Weekly* article. Did you also
10 get the impression or were you told that there
11 was concern relating to ongoing legal cases?

12 **A.** Yeah, yeah, certainly.

13 **Q.** Both of those?

14 **A.** Yes.

15 **Q.** "It could provide branches ammunition to blame
16 Horizon for future discrepancies."

17 Again, that's all rolled up with the same
18 issue?

19 **A.** Yeah.

20 **Q.** If we go over the page, please:

21 "The Receipts and Payment mismatch will
22 result in an error code being generated which
23 will allow Fujitsu to isolate branches affected,
24 by this problem, although this is not seen by
25 branches, we have asked Fujitsu why it has taken

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1 Solution Two should be progressed. Let's just
2 look at those solutions briefly. We have
3 Solution One:

4 "Alter the Horizon Branch figure at the
5 counter to show the discrepancy. Fujitsu would
6 have to manually write an entry value to the
7 local branch account."

8 Were you aware, at that time, that that was
9 something that Fujitsu had the facility to do,
10 to manually write an entry to the local branch
11 account?

12 **A.** No.

13 **Q.** It says:

14 "IMPACT -- When the branch comes to complete
15 next Trading Period they would have a
16 discrepancy, which they have to bring to
17 account.

18 "RISK -- this has significant data integrity
19 concerns and could lead to questions of
20 'tampering' with the branch system and could
21 generate questions around how the discrepancy
22 was caused. This solution could have moral
23 implications of Post Office changing branch data
24 without informing the branch."

25 Were you ever aware throughout your time at

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1 so long to react to and escalate an issue which
2 began in May. They will provide feedback in due
3 course."

4 Now, we saw in relation to the earlier bug
5 that there was interaction with Fujitsu. We saw
6 that Anne Chambers email, et cetera. Was that
7 something you experienced with Fujitsu, that
8 they take a long time to react to problems such
9 as this?

10 **A.** I don't think typically that was my experience
11 but my exposure was very limited. If I did need
12 to have -- or put forward issues for particular
13 branches, it would generally be other people
14 that were having the interaction with Fujitsu
15 rather than myself.

16 **Q.** So it wasn't something you had direct experience
17 of but were you aware of any complaints from
18 anybody within the Post Office about the time
19 that it took for Fujitsu to react to these kinds
20 of issues?

21 **A.** I wasn't aware of any particular issues that
22 were flagged to me.

23 **Q.** If we go down to the "Proposal for affected
24 Branches", we have a number of different
25 solutions and the recommendation is that

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1 the Post Office of issues relating to manually
2 altering data within the branch?

3 **A.** Not to my recollection, no.

4 **Q.** Solution Two, which is the one that they
5 recommended, was:

6 "P&BA will journal values from the
7 discrepancy account into the Customer Account
8 and recover/refund via normal processes. This
9 will need to be supported by an approved POL
10 communication. Unlike the branch 'POLSAP'
11 remains in balance albeit with an account
12 (discrepancies) that should be cleared.

13 "IMPACT -- Post Office will be required to
14 explain the reason for a debt recovery/refund
15 even though there is no discrepancy at the
16 branch.

17 "RISK -- could potentially highlight to
18 branches that Horizon can lose data."

19 Were you aware of a concern within the Post
20 Office of highlighting to branches that Horizon
21 could lose data?

22 **A.** No.

23 **Q.** Solution Three:

24 "It is decided not to correct the data in
25 the branches (ie Post Office would prepare to

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1 write off the 'lost').

2 "IMPACT -- Post Office must absorb circa
3 £20K loss.

4 "RISK -- huge moral implications to the
5 integrity of the business, as there are agents
6 that were potentially due a cash gain on their
7 system."

8 Were you aware, at this stage, the
9 significance of these huge moral implications,
10 and debates of this nature taking place within
11 the Post Office?

12 A. Only in a more generalised sense about
13 a concern, you know, after the *Computer Weekly*
14 article about the robustness of Horizon. And,
15 as I say, the messaging on that down the chain,
16 to me at least, was the system is robust, it's
17 audited and there is monitoring in place. But
18 nothing in terms of this specific problem.

19 Q. If we scroll down to the next page, you're aware
20 that your name is mentioned there in an action
21 point summary.

22 A. Yes.

23 Q. It's the fourth one down, it says:

24 "Branch Performance review: Confirm with
25 Shaun Turner any future audits for Branches and

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1 them.

2 Q. We saw from the Castleton case, for example,
3 earlier on, an email that had been sent to you
4 being forwarded in the context of legal
5 proceedings. Were you aware at this stage that
6 some people were raising faults with Horizon in
7 their defence in legal proceedings?

8 A. In 2010?

9 Q. Yes.

10 A. I was aware, because of the Justice for
11 Subpostmasters, that yeah, that was being
12 raised, yeah.

13 Q. We've seen earlier about your knowledge of the
14 Callendar Square bug. Was this the time,
15 perhaps, to have raised that issue more widely?

16 A. Perhaps but, you know, my feeling on that bug
17 was that that had been fixed and that the impact
18 of it would have been monitored through the two
19 Problem Management Teams. So if there were
20 concerns to be raised to wider stakeholders,
21 I would have expected that to happen through
22 that process.

23 Q. But by 2010 you had known that the Callendar
24 Square bug had gone on for quite a while,
25 affected quite a few branches, a significant

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1 any performance issues flagged."

2 Do you know why you're mentioned there?

3 A. I can speculate or take an educated guess, which
4 would be, at this time, part of my job role was
5 the production and maintenance of a sort of
6 branch profile, which had the branches for all
7 the network in there, which was used to -- as
8 one of the tools to guide audits. I suspect
9 that this action is to check with me that
10 there's no impact from this particular issue on
11 that profile.

12 Q. In this period, so we're talking about October
13 2010 or thereabouts, we know that, for example,
14 Seema Misra, a subpostmistress, was being
15 prosecuted. Did anyone ever discuss with you
16 these kinds of concerns and the potential impact
17 that they may have on ongoing legal cases?

18 A. No.

19 Q. Were you aware, at this stage, that people were
20 being prosecuted for shortfalls on Horizon?

21 A. I was aware that there was a business process to
22 do so. But, yeah, in terms of direct
23 involvement or interactions with those
24 individuals in the business that were pursuing
25 those cases, I didn't have any contact with

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1 sum. You're now informed about an issue
2 relating to the receipts and payments mismatch
3 in Horizon Online. The knowledge that you had
4 developed over those years, was that not
5 something that you thought "Actually, this is
6 an issue now"?

7 A. I don't think it's so much that; I think it is
8 that I had a kind of institutional trust in the
9 processes and teams that were managing these
10 issues.

11 Q. Do you think the teams were acting in silos and
12 weren't really communicating with each other in
13 respect of bugs, errors and defects in Horizon?

14 A. Which teams do you mean?

15 Q. You often refer to other teams dealing with
16 issues and it not being within your sphere at
17 that time. Was that caused by any inherent
18 problem with the structure at the Post Office?

19 A. I think -- I mean, I think the reason, in the
20 Callendar Square case, for example, that
21 I wanted to get that in a Problem Management,
22 was that I saw them as the most appropriate
23 people to resolve it. They were the people with
24 the expertise, the people with the contacts. So
25 I don't think there was -- from my perspective

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1 at least, at this time -- that there was sort of
 2 institutional or process failings, as such. In
 3 retrospective, I think you can make that
 4 argument, certainly.

5 Q. Because there was this team that existed that
 6 you could pass over the problem to and it no
 7 longer became your problem?

8 A. Well, I don't see it like that; I see it as
 9 passing it to the individuals who are most
 10 appropriate to resolve that particular issue for
 11 the branch.

12 Q. During this period, so 2010, you were the branch
 13 standards data analyst. In that role, you made
 14 outbound calls, I think, to branches to tackle
 15 common issues; is that right?

16 A. Yeah, conformance and compliance issues, yeah.

17 Q. Can you tell us how such calls would be made?
 18 What was the process involved? Why would you
 19 call branches?

20 A. So we had streams of compliance data coming in
 21 to the team. So this would be things like mails
 22 data or cash declaration data, and that was
 23 analysed by myself and a colleague, and we would
 24 identify sets of branches to pull together
 25 a call campaign based on their performance.

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1 A. Proactive calls? No, I wasn't aware of
 2 anything.

3 Q. How, in your view, would an issue such as this
 4 receipts and payments mismatch issue in 2010 be
 5 cascaded down to branches, branches that didn't
 6 know that they were affected by the bug?

7 A. Well, if a decision was made to communicate it,
 8 there was the sort of weekly *Counter News*,
 9 I would imagine, or *Branch Focus*, I think it may
 10 have been named at that stage, or Memo View,
 11 through the -- which is a broadcast, messaging
 12 broadcast. Those would be typically the
 13 channels down to the branch, if we were going to
 14 communicate.

15 Q. What would they typically have said about
 16 an issue such as this receipts and payments
 17 issue?

18 A. I don't know. I wasn't involved in
 19 communications so I can't say what, typically,
 20 the messages would say. But I would imagine it
 21 would outline the nature of the problem and
 22 advise branches on how to avoid any sequences of
 23 icons -- you know, icons pressing that would
 24 result in that particular bug.

25 Q. Taking this one as an example, if that didn't

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1 So you'd be looking at the branches that
 2 were struggling the most with, say, oversized
 3 mails, identify those, upload them for the team
 4 and then they would make outbound calls to the
 5 branches to do some coaching.

6 Q. Was there a process of making outbound calls to
 7 branches that may be affected by bugs, errors
 8 and defects in Horizon?

9 A. Not in the team that I was in at this stage, it
 10 was conformance and compliance.

11 Q. Was there a team that was carrying out, to the
 12 best of your knowledge, those kinds of outbound
 13 calls?

14 A. If there was, I -- it would be HSD, I would say,
 15 and then further down the line, if there was
 16 discrepancies, it may well be that P&BA and
 17 Chesterfield or the contracts adviser would
 18 become involved.

19 Q. But the idea of making these proactive calls,
 20 which is what you were doing for a certain type
 21 of problem --

22 A. Yes.

23 Q. -- are you aware of an equivalent of that in
 24 relation to bugs, errors and defects with
 25 Horizon?

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1 happen, would you be concerned by it?

2 A. It depends on the bug and the level of branches
 3 impacted and how robust the monitoring is to
 4 ensure that we're picking up any other impacted
 5 branches.

6 Q. So we have here "Receipts/Payments Mismatch"
 7 affecting circa 40 branches, Horizon Online,
 8 overall cash value of £20,000 loss. In those
 9 circumstances, would you have expected it to
 10 have been communicated via those channels that
 11 you've just described?

12 A. Um, yeah, as I say, I wasn't involved in the
 13 decision-making process around communications
 14 but, to me, it feels significant enough that we
 15 would want to communicate something.

16 Q. Are you aware of the processes involved in how
 17 that communication took place?

18 A. As I say, it would either be through *Branch*
 19 *Focus* or, if it was more urgent, it would go
 20 through the message broadcast service. But in
 21 terms of the sort of process for generating that
 22 communication, as I say, that would generally
 23 come through the problem management process and
 24 then to internal stakeholders and the comms team
 25 ultimately to distribute.

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1 Q. I'm going to take you to an even later problem,
 2 and that's the smart ID receipts and payments
 3 mismatch you've mentioned in your statement.
 4 Can we look at POL00043585, please. So this is
 5 a very late issue in the context of this
 6 Inquiry. We have the date there, 27 November
 7 2018. Are you aware of this occurring?
 8 A. Yes.
 9 Q. Yes. Are you aware that this was during the
 10 Group Litigation against the Post Office?
 11 A. Yes.
 12 Q. Can you summarise for us, looking there at the
 13 incident detail, what issue this caused in
 14 recording transactions?
 15 A. I believe it caused a receipts and payments
 16 mismatch in the branch.
 17 Q. You're named there, "Shaun Turner, Enhanced User
 18 Management Product Owner". Why are you named as
 19 having attended that update?
 20 A. At this time, I was working on the Enhanced User
 21 Management Programme as a product owner, and
 22 that role involved taking the business
 23 requirements to the technical teams to build the
 24 solution.
 25 Q. Having been aware of the Callendar Square bug,

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1 that this one seems to have been escalated in
 2 2018?
 3 A. I don't know. This was my first exposure to
 4 a kind of forum like this.
 5 Q. Did you question why it was taking place?
 6 A. Well, I knew why it was taking place. It was to
 7 drive the solution for the bug that we'd
 8 encountered in the network.
 9 Q. I mean, you have quite significant people from
 10 the business there, Angela van den Bogerd we've
 11 heard about, and others. You also have the head
 12 of Legal, Rodric Williams, attending this
 13 meeting. Did it strike you as surprising that
 14 an incident was being raised among such
 15 a significant group of people?
 16 A. Not considering the business context at the
 17 time, no.
 18 Q. What was that context?
 19 A. The ongoing GLO proceedings.
 20 Q. Do you think it would have been helpful to have
 21 had meetings of this sort involving senior
 22 individuals within the Post Office and Fujitsu
 23 discussing earlier incidents of the type that
 24 we've discussed today?
 25 A. In hindsight, yes.

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1 having been aware of the bug in 2010, the
 2 receipts and payments mismatch issue that we
 3 just looked at, now being told in 2018 about
 4 this particular incident, were you concerned
 5 about the integrity of Horizon?
 6 A. I was concerned about this bug and the impact it
 7 might have. As to why the questions about the
 8 integrity, I --
 9 Q. Were people at this meeting discussing historic
 10 issues, historic bugs?
 11 A. No.
 12 Q. Did you, at this meeting, mention those two
 13 incidents that you had previous knowledge of?
 14 A. Not to my recollection, no.
 15 Q. There are a large number of people named here as
 16 having attended, both from the Post Office and
 17 also we see from Fujitsu. We see Steve Bansal,
 18 Pete Newsome. Do you remember Fujitsu people
 19 attending?
 20 A. Yeah, I do remember there were Fujitsu
 21 attendees, yeah.
 22 Q. Do you know when the Post Office started raising
 23 incidents such as this with such a wide group of
 24 individuals? Was there a particular moment in
 25 time when these issues were escalated in the way

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1 Q. Do you know by this stage, as late as 2018, how
 2 this incident was being cascaded down to
 3 branches?
 4 A. I don't recall specifically the communications
 5 to the branches but I believe there is mention
 6 of communication to the branches further down
 7 this document.
 8 Q. Perhaps we can look down page 3. There's
 9 mention of Impact there:
 10 "As of [22 January 2019] 19 branches are
 11 impacted. Impacts are:
 12 "Confusion for the user.
 13 "Transactions accounted for against the
 14 wrong BP/TP.
 15 "Calls into contact centres from
 16 users/branches impacted.
 17 "Remedial action required by POL to resolve
 18 cases."
 19 Now, are you aware of there being
 20 a significant effort to notify branches,
 21 branches that may not know that they're affected
 22 by this incident, that it is a known incident.
 23 A. In terms of the sort of branches that were
 24 identified by Fujitsu, there was a specific
 25 process to contact those branches, discuss the

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1 cause of the issue and the branch and rectify
 2 any accounting issues.
 3 **Q.** In terms of branches that hadn't been identified
 4 by Fujitsu, was there a way of notifying them of
 5 this particular incident, an incident that
 6 presumably has an affect on the cash balancing?
 7 **A.** As I say, I think further down in this --
 8 I think it's this document, there is mention of
 9 a wider communication to branches that were on
 10 Smart ID at this point. I don't recall the
 11 content of that communication.
 12 **Q.** We can scroll down, if you like.
 13 **A.** Yeah, sorry the top of that page there, "BAU
 14 impact".
 15 **Q.** So:
 16 "Contact centres ... minimal impact ...
 17 "Live service desk: minimal impact ...
 18 "Finance Service centre: minimal impact ...
 19 Transaction correction team are contacting
 20 branches to ensure accounts balance."
 21 Do you know if that is affected branches or
 22 those that are known to be affected or do you
 23 think that's contacting branches more broadly?
 24 **A.** I think that is the branches that are impacted
 25 but there is some documentation that I have

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1 be the same issue. Can you tell me if it is in
 2 fact the same issue. It's 4.3, "Receipts &
 3 Payments Misbalances -- FIXED [September] 2019".
 4 **A.** Yeah, that's the same issue.
 5 **Q.** So it seems there the issue was fixed a year
 6 after that earlier paper. So it took quite
 7 a while to fix; do you remember it taking quite
 8 a while to fix that issue?
 9 **A.** Yeah.
 10 **Q.** I'll just read that for the record. It says:
 11 "Multiple login functionality allowed a user
 12 with the same Horizon ID ... to be logged in at
 13 more than one terminal providing any one of the
 14 sessions was active ... Fujitsu identified in
 15 cases where an SU or Office Balance was
 16 initiated in those circumstances then it could
 17 cause receipts and payments misbalances in the
 18 branch which had to be corrected by
 19 a Transaction Corrections.
 20 "These issues were fixed by the Horizon
 21 release in September/October 2019, which put in
 22 place further controls on multiple logins
 23 related to Stock Unit and Branch Balancing and
 24 changing Stock Units."
 25 You have in your witness statement, it's

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1 seen -- apologies, like -- I can't find it at
 2 the moment, but it is one of these Horizon issue
 3 management reports where it mentions wider
 4 communications to branches that are on Smart ID.
 5 I think I provided a later version of this
 6 particular report. Could we bring that up?
 7 **Q.** We may not need to. I can ask you a very broad
 8 question, which is are you aware, as at 2018 or
 9 as at now, of a policy being in place within the
 10 Post Office that, if you get a significant
 11 incident that affects cash account balances,
 12 that it is distributed widely across the network
 13 to as many subpostmasters as you possibly can,
 14 as many branches as you possibly can?
 15 **A.** I'm not aware of a policy to that effect. I can
 16 only reflect on my experience of this particular
 17 incident, which I believe the project manager
 18 tried to manage with maximum transparency, both
 19 with internal stakeholders and with the branches
 20 that are impacted.
 21 **Q.** Can we look at POL00037819. This is a paper
 22 that seems to have been written by you. Do you
 23 remember this paper?
 24 **A.** I do.
 25 **Q.** If we look at page 3 we have there what seems to

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1 paragraph 282 of your witness statement, listed
 2 a wide range of people who were kept in the loop
 3 about this particular issue.
 4 **A.** Mm-hm.
 5 **Q.** You said that Esther Harvey sought to ensure
 6 various internal stakeholders were informed.
 7 Who is Esther Harvey?
 8 **A.** She was the project manager for the Smart ID or
 9 Enhanced User Management Programme.
 10 **Q.** Why was she responsible for ensuring various
 11 internal stakeholders were informed about this
 12 issue?
 13 **A.** That was part of her role as project manager.
 14 **Q.** Which stakeholders do you have in mind when you
 15 refer to informing stakeholders?
 16 **A.** The Smart ID project team itself, in the first
 17 instance, so that would have been myself and my
 18 colleagues that were working on the Smart ID
 19 project; Angela van den Bogerd; Julie Thomas,
 20 who was the project sponsor; the relevant
 21 parties in the FSC, which was the Finance
 22 Service Centre in Chesterfield, who would be
 23 dealing with any rectification of accounts. So
 24 that would kind of be broadly the ones I'm
 25 thinking of.

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1 Q. How high up within the Post Office was this
2 receipts and payments misbalancing issue known,
3 2018/2019?

4 A. At quite senior levels, I would say. I mean
5 Angela van den Bogerd was certainly quite senior
6 and involved with the GLO.

7 Q. Do you think it went above her?

8 A. I couldn't say.

9 Q. What was the relevance of this particular issue
10 to the GLO?

11 A. Well, because the GLO were looking at Horizon
12 Issues, bugs, defects, and obviously this was
13 a defect that was causing -- impacting accounts,
14 branch accounts.

15 Q. Can you remember any conversations with anyone
16 in management within the Post Office about the
17 significance of this issue in that context?

18 A. Not that I had, no.

19 Q. Are you aware of any conversations that others
20 had?

21 A. Not in terms of the content but I'm aware that
22 conversations were held with Julie Thomas and
23 Angela van den Bogerd and, of course, they were
24 on the weekly calls that we were having to track
25 and monitor this, which is sort of documented in

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1 about bugs quickly enough, in my view. So yeah,
2 I would agree that, following reflection, there
3 should have been better management of Fujitsu.

4 Q. You say you weren't finding out about them
5 enough or quickly enough. Whose responsibility
6 was that on either side?

7 A. My -- as I say, my understanding is, in terms of
8 the incident management and problem management
9 processes, is that it should be flagged through
10 that route. Where there are issues with the
11 system, it should be raised as across the main
12 problem and managed with communications going
13 out to branches as appropriate.

14 Q. Raised by who?

15 A. In cases where the branch is aware of it, the
16 branch, or from Fujitsu themselves through their
17 monitoring. So it should be raised by the
18 branch to Horizon System helpdesk and then by
19 Fujitsu across the Post Office, if it's
20 something that's going to impact multiple
21 branches.

22 Q. Has that improved in recent months, years?

23 A. Well, I can only go on the experience that I've
24 had with the Smart ID bug and I did find, in
25 that particular case, that Fujitsu were very

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1 the reports that we brought up earlier.

2 Q. You say in your statement at paragraph 296 that
3 this is an example which shows that the Post
4 Office's management of Fujitsu was lacking. Can
5 you tell us what you mean by that?

6 A. There was -- when this happened, not least
7 because we were going through the GLO at the
8 time, there was a lot of soul searching within
9 the team about how this had occurred and whether
10 we could have done anything to identify it.

11 And, at least from my perspective, I felt
12 that these kind of issues, given that the
13 functionality that led to this was a change,
14 a significant change to the way that user
15 management was managed on Horizon, I personally
16 felt that this should have been flagged to us as
17 part to the impact assessment of those changes,
18 such that we could have avoided these issues.

19 Q. Have you reflected on previous bugs, errors and
20 defects that you've identified or been involved
21 in and whether, in those particular cases, there
22 were issues with the management of Fujitsu?

23 A. I think particularly since the GLO findings and
24 being aware of some of the points made in those
25 cases, I would say, yes, we weren't finding out

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1 quick to react, they did a lot of work in terms
2 of identifying not just the scenarios that had
3 caused issues in the live estate but also other
4 potential scenarios that could potentially cause
5 issues in the live estate from the same sort of
6 functionality. So, yeah, my experience was that
7 that was improved, if you looked back, compared
8 to something like the Callendar Square issue.

9 Q. Was there a marked shift of any sort following,
10 for example, the Group Litigation or since the
11 beginning of this Inquiry?

12 A. My exposure has been through, you know, some
13 very limited windows where I have been dealing
14 with bugs. So I can only say that compared to
15 the Callendar Square, my experience of working
16 with Fujitsu collaboratively to resolve the
17 Smart ID EUM bug in 2018 was much improved.

18 We had a good working relationship with
19 Fujitsu at that time. I found them very helpful
20 and, as I say, there was a -- there was
21 documentation produced that identified all of
22 these various scenarios that could potentially
23 cause the receipts and payments mismatches.

24 Q. I'm going to move on now to a few discrete
25 issues. I won't be very long with them but

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1 they're ones I have been asked to raise with
 2 you. The first is transaction correction
 3 process and can we go to POL00039024. You've
 4 dealt with this at paragraph 137 of your
 5 statement. This is a document from October
 6 2007. Can you briefly tell us what your
 7 involvement was in issues concerning transaction
 8 corrections?

9 **A.** With this particular document, I think I stated
 10 this in my witness statement, my colleague Nicky
 11 Barraclough wrote the document. I was -- I'm
 12 listed as a contributor here and I believe that
 13 my contributions were predominantly reviewing
 14 the process flows, the process flows in the
 15 document, and also the reporting that are in the
 16 appendices the spreadsheets that we use to
 17 manage deductions from remuneration.

18 **Q.** Thank you. I'm just going to take you to two
 19 passages in this document and the first is on
 20 page 2, and it's the bottom of page 2,
 21 "Timeliness of Issuing Transaction Correction",
 22 it says:

23 "The time taken to issue Transaction
 24 Corrections can be slow, including some cases
 25 where it has taken 2 years to clear the ledger.

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1 **Q.** If we go over the page to page 3 there's another
 2 section on "Disputing the Transaction
 3 Correction". It's the first paragraph there
 4 that I would like to ask you about. It says:
 5 "The current process for disputing
 6 Transaction Corrections allows the subpostmaster
 7 to challenge the error at every stage of the
 8 process, even after pressing the button on the
 9 Horizon System to settle the debt centrally.
 10 This delays the process in recovering any
 11 outstanding monies, and can be used as
 12 a deliberate delaying tactic in order to delay
 13 making payment."

14 Is that something that you remember?

15 **A.** Not specifically. No.

16 **Q.** The mention there of a deliberate delaying
 17 tactic, do you recall a culture within the Post
 18 Office to assume that subpostmasters, assistants
 19 and others were up to no good or using
 20 particular tactics to delay payments?

21 **A.** No, not to my knowledge, no.

22 **Q.** Thank you. Totally different topic, the PING
 23 Project. Can we look at FUJ00091292, please.
 24 Very briefly, because you have dealt with it in
 25 your witness statement, what was the PING

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1 Not only does this delay the time taken to
 2 recover outstanding debt, but it also leaves the
 3 subpostmaster feeling frustrated that they are
 4 being notified to rectify a mistake that they
 5 may not remember, or where the evidence has been
 6 destroyed that would support a dispute to the
 7 Transaction Correction."

8 This is 2007. Is this something that you
 9 remember, an issue that you remember?

10 **A.** Yeah, I remember concerns about the length of
 11 time it took to issue transaction corrections.

12 **Q.** Looking at it from 2007, was that a historic
 13 issue at a particular point in time, in 2007, or
 14 something that continued after this document had
 15 been written?

16 **A.** I don't think it was any different, in my
 17 experience at least, before this document. But
 18 there were always issues that branches would
 19 raise about the length of time it was taking to
 20 create an issue, transaction corrections to
 21 them. I think some of it, from my recollection,
 22 was tied to getting information from clients,
 23 which often had, sort of, long lead times. But,
 24 yeah, it's not an issue that suddenly appeared
 25 in 2007.

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1 Project?

2 **A.** The PING Project was a way of improving the
 3 accounting for third-party terminals, for
 4 example the Camelot Lottery terminal. Before
 5 the PING Project was implemented, branches would
 6 have to key their transactions into the Lottery
 7 terminal as they were doing Lottery sales, and
 8 so forth, and then they would go and key that
 9 into Horizon for accounting purposes. What the
 10 PING Project sought to do was remove that human
 11 input by harvesting the transactions directly
 12 from the third party terminal, eg the Lottery
 13 terminal, and send those over to Horizon as
 14 transaction acknowledgements.

15 **Q.** Thank you. If we turn to page 5, you're listed
 16 as a reviewer in respect of this particular
 17 document.

18 **A.** Yes.

19 **Q.** If we look at page 9, there is the background.
 20 I just want to briefly take you to that
 21 background. It's the second paragraph and down.
 22 It says:

23 "The client data is uploaded into POL-FS and
 24 compared with the equivalent HNG-X data which
 25 has to be manually input by the agent/counter

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1 clerk. Ideally the data, when compared, should
2 be the same but number of conformance issues
3 have been identified where agents/counter clerks
4 do not perform end of day routines correctly, do
5 not input the Camelot details into HNG-X as they
6 should, and can key incorrect figures, leaving
7 Product and Branch Accounting with
8 a reconciliation difference. This difference
9 may require the issuing of a transaction
10 correction."

11 Can you tell us what a "conformance issue"
12 is?

13 A. In this particular context, I believe it means
14 either not inputting the lottery figures into
15 Horizon at the end of the day or inputting them
16 incorrectly, such that there would be
17 a mismatch.

18 Q. In terms of non-conformance, is that something
19 that the Post Office generally understood would
20 happen?

21 A. Yeah, I mean, it's reliant on the postmaster in
22 branch keying figures and keying figures
23 correctly.

24 Q. To what extent do you think the Post Office put
25 too much emphasis on conformance issues rather

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1 develop, easier to develop, so that new products
2 could be brought on more easily. That was the
3 sense that I got when I joined that programme.

4 Q. Do you know why IBM was chosen for that?

5 A. I wasn't party to those sort of contractual
6 discussions. I don't remember anybody talking
7 to me about what the options were and whether
8 there were other alternatives that we'd looked
9 at.

10 Q. Do you know why the decision was taken to
11 withdraw from that project?

12 A. I wasn't directly involved but I did hear
13 suggestions that there were concerns over cost
14 and there were concerns over whether it would be
15 deliverable to the timescales we needed it to
16 be. I think this was not just a simple
17 changeover, like Horizon Online, where we were
18 introducing new software; it was hardware, data
19 centre and the front office as well, so it was
20 a considerable challenge.

21 MR BLAKE: Thank you very much, Mr Turner. Those
22 are all of my questions.

23 I think Mr Stein has some questions.

24 Mr Whittam? No.

25 Oh, and Ms Page has a question as well.

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1 than, for example, bugs, errors and defects,
2 historically, or ...

3 A. Yeah, I mean, I was involved in a team that was
4 managing conformance for a number of years, and
5 I think, in retrospective, there should have
6 been -- there certainly should have been more
7 focus on bugs and issues and the management of
8 those bugs and issues but it was still important
9 to manage conformance. We had contracts with
10 clients, Royal Mail being most notable, that if
11 we didn't achieve certain levels of performance,
12 we were financially penalised.

13 But, in terms of the balance between those
14 two things, I think an argument can be made that
15 we should have put more emphasis on bugs and
16 defects, certainly.

17 Q. Thank you. My final issue is IBM, who you've
18 mentioned in your witness statement. Between
19 December 2015 and March 2017 you were business
20 readiness lead and that involved working with
21 IBM to replace Horizon. Do you know why the
22 Post Office wanted to replace Horizon at that
23 stage?

24 A. I think it's just old technology and it was time
25 to move on to something that was quicker to

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1 We'll start with Mr Stein.

2 **Questioned by MR STEIN**

3 MR STEIN: Sir, I'm grateful, my learned friend,
4 Mr Blake, raised the question, sir, this morning
5 of disclosure and I'm just going to pause to
6 note that on 14 February this year, we wrote to
7 the Inquiry concerning the difficulties with
8 disclosure and, indeed, concerning the
9 difficulties that the lack of closure of scripts
10 and other documents were going to be causing us
11 with putting forward questions for this witness,
12 Mr Turner.

13 So I'm going to ask that that letter be
14 resent so that it goes directly to you, sir, and
15 therefore you can see how it is that we frame
16 matters at that date. That wasn't the first
17 time, sir, we've raised issues regarding
18 scripts.

19 With that as a starting point, I'll now move
20 to my questions for Mr Turner.

21 Mr Turner, as you've heard from Mr Blake and
22 indeed myself, there have been some issues
23 regarding disclosure that may inhibit our
24 ability to ask you some wider questions and that
25 could cause, therefore, a need for you to return

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1 to the witness box at a later stage.
 2 **A.** Okay.
 3 **Q.** I'm just going to refer you to your own
 4 statement, I'll read a part of it, paragraph 12,
 5 page 5. You refer to your role to analyse the
 6 data arising from calls to identify trends and
 7 common issues experienced by subpostmasters.
 8 **A.** Yes.
 9 **Q.** Okay. Do you call yourself a data analyst?
 10 What would be the term that you would use?
 11 **A.** At that time it was incident analyst.
 12 **Q.** Incident analyst. Right. Now, help us on the
 13 other side of the calls from the subpostmasters.
 14 You were aware at that time that Fujitsu also
 15 had their own helpdesk taking calls?
 16 **A.** Yes.
 17 **Q.** We know that because indeed you have spoken
 18 today about the fact that some calls were taken
 19 by the Post Office team and some were taken by
 20 Fujitsu; is that correct?
 21 **A.** That's correct.
 22 **Q.** Right. Now the analysis of common issues
 23 experienced by subpostmasters, that job would
 24 need to be shared, I assume, between the Post
 25 Office and Fujitsu?

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1 analysts myself.
 2 **Q.** That was going to be my next question which is:
 3 how were these things tied together? If it
 4 wasn't tight together at your level at that
 5 time, at what level was it tied together and who
 6 can you direct us to, who should be able to know
 7 how these things came together?
 8 **A.** There were forums at our level where common
 9 issues were discussed. I didn't have any direct
 10 contact with their equivalent of the incident
 11 analysts but there were forums between the
 12 helpdesks. But I would imagine if there were
 13 common themes coming through, these should have
 14 been raised throughout the problem management
 15 process and then managed at that level between
 16 the two Problem Management Teams.
 17 And then there was a Service Management
 18 Forum, as well, where the two parties met to
 19 similarly discuss problems.
 20 **Q.** The numbers of calls, in terms of working out
 21 numbers of calls coming into the Post Office
 22 helpdesk versus Fujitsu, can you give us an idea
 23 whether this was an even spread of 50/50 that
 24 came into the Post Office versus Fujitsu, or
 25 whether it was more Post Office or more Fujitsu?

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1 **A.** Yes, so the -- both helpdesks should have had
 2 an incident management framework in place that
 3 included analysis of calls coming in, trends,
 4 and I would expect that if system issues were
 5 coming through, common system issues, that that
 6 would manifest in HSD and be raised to their
 7 Problem Management Team, if appropriate.
 8 **Q.** Now, within that answer you used the word
 9 "should" and the words "I would have
 10 expected" --
 11 **A.** Yes.
 12 **Q.** -- in relation to those sorts of systems. Now,
 13 clearly you can give evidence about the Post
 14 Office system. What knowledge did you have at
 15 this time about the Fujitsu equivalent systems?
 16 **A.** I'm trying to remember. I know there was
 17 documentation that showed how Fujitsu should
 18 manage incidents and track common themes, and
 19 that would have been the basis from my
 20 knowledge. My sort of layman's view of it was
 21 that they would be replicating something very
 22 similar to what we were doing in the NBSC. In
 23 other words, they would have some kind of data
 24 team that was looking at trends. I didn't have
 25 any direct contact with their own incident

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1 Have you got any ...
 2 **A.** I'm sorry, I don't recall the numbers or the
 3 sort of volumetric data at this stage.
 4 **Q.** Just remaining with this question, you've
 5 explained that there should have been something
 6 operating in a similar way by way of incident
 7 analysis with Fujitsu?
 8 **A.** Yes.
 9 **Q.** Did you see documents that would have provided
 10 the other side of the coin, the Fujitsu side of
 11 the coin, and your documents synthesised, put
 12 together, so that you've got a picture? Did you
 13 see such things?
 14 **A.** Not to my recollection, no.
 15 **Q.** Were there such things?
 16 **A.** I don't know after this amount of time. There
 17 were forums where common issues were discussed,
 18 so there was some interaction between the two
 19 helpdesks, and we tried to resolve issues,
 20 operational issues through those forums as well.
 21 But I don't remember seeing specific
 22 documentation other than what I've referred to
 23 in my witness statement.
 24 **Q.** Just before I then ask you a little bit more
 25 about how documents were kept, shouldn't there

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1 have been documents that provided a combination
 2 of these are the issues we are seeing within POL
 3 and these are the issues we are seeing within
 4 Fujitsu, and they are showing similar issues
 5 being raised or similar problems or good things
 6 or indeed bad things. Shouldn't such things
 7 have existed and shouldn't they have come to
 8 you?

9 **A.** Yes, yeah.

10 **Q.** Now, you have remained at the Post Office for
 11 quite some time, indeed I think it's essentially
 12 your career so far?

13 **A.** That's right.

14 **Q.** You describe in your statement the analyst work
 15 you carried out in relation to incidents. Can
 16 you just help us with access to those, the
 17 analysis that you've carried out. There must
 18 be, going back now to what, the early days of
 19 Horizon and then through, there must be hundreds
 20 of these documents that you've been created or
 21 been part of the creation of; where are they?

22 **A.** What type of documents are you talking about,
 23 specifically?

24 **Q.** Well, let's go with the analysis of the NBSC
 25 call performance, call operating performance, as

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1 **A.** It would be an incident analysis report on
 2 topic X and, if the problem was raised, it would
 3 be a problem record on that topic.

4 **Q.** Do you have access to systems that contain this
 5 documentation?

6 **A.** I don't.

7 **Q.** Help us why not?

8 **A.** The passage of time. I've moved through various
 9 roles since then.

10 **Q.** Have you been asked by either the Post Office or
 11 lawyers on their behalf regarding your knowledge
 12 of access to this material where it might be?

13 **A.** No.

14 **Q.** Despite the fact that you're the author of such
 15 documentation over time?

16 **A.** Yes.

17 **Q.** Now, I'm just going to complete this particular
 18 topic range. Oversight of the helpdesk, this is
 19 the Fujitsu helpdesk. Now, you would expect,
 20 I imagine, that Fujitsu should carry out its own
 21 oversight, governance operation regarding
 22 helpdesk; okay? Who within Post Office
 23 monitored Fujitsu's oversight of its own
 24 helpdesk?

25 **A.** The service management team, I think, from

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1 an example, or trends within difficulties being
 2 experienced by subpostmasters. Where are these
 3 documents?

4 **A.** I don't know at the moment. There certainly
 5 were reports produced. I know where problems
 6 were raised off the back of those reports they
 7 were logged in a system that we used at that
 8 time called Remedy, which was --

9 **Q.** Did you say "Remedy"?

10 **A.** Remedy, yes, which was both the incident
 11 management tool and also the problem management
 12 tool so that's where the calls were logged, and
 13 any problems that were raised to the Problem
 14 Management Team were also logged in there with
 15 the originator.

16 **Q.** We've encountered some problems with terminology
 17 being used, so scripts for helpdesks are
 18 sometimes called other names other than scripts?

19 **A.** Right.

20 **Q.** Okay? So help us identify, the analysis work
 21 you would have carried out, so this was the
 22 analysis to identify trends and common issues
 23 experienced by subpostmasters, what would have
 24 been the title or what would be the title of
 25 such analysis reports?

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1 recollection.

2 **Q.** Service management team?

3 **A.** Yeah.

4 **Q.** Right, and a particular name of an individual
 5 you would recall at any given time?

6 **A.** At any given time, somebody like Dave Hulbert
 7 would have been heading up that team. That's
 8 where I believe the monthly service management
 9 reviews were managed.

10 **Q.** There's a term used, which is used within your
 11 statement and referred to in a document that you
 12 were taken to today by Mr Blake, which is
 13 a cross-domain problem.

14 **A.** Yes.

15 **Q.** Is that a term of art within the Post Office to
 16 describe a type of document or report or system
 17 where there is a problem that is known to both
 18 Fujitsu and the Post Office?

19 **A.** It's terminology to describe any problem that
 20 requires interaction with a third-party
 21 supplier, ie it's not just within Post Office's
 22 gift to resolve.

23 **Q.** Right. Is there any sort of risk analysis
 24 system that has been developed to decide when
 25 such a thing does reach the stage of it being

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1 a cross-domain problem? Is there a trigger for
 2 this to say "Look, this is cross-domain"?
 3 **A.** There were problem management documents around
 4 prioritisation, and so forth, in terms of
 5 issues.
 6 **Q.** Right. And risk analysis similar? Were there
 7 documents around that considered risk analysis
 8 in the way that traditionally regulators often
 9 do, thinking about either use of a traffic light
 10 system, like green or amber or red, to analyse
 11 risk?
 12 **A.** I don't recall specific documents but I do
 13 remember conversations with problem managers
 14 about rating problems based on the number of
 15 branches impacted, and so forth.
 16 **Q.** Thank you. One remaining question. You were
 17 asked a number of questions by Mr Blake
 18 regarding the receipts/payments mismatch issue.
 19 **A.** Yeah.
 20 **Q.** He referred you to a document, which is a Post
 21 Office Fujitsu document, that discussed that.
 22 That's the "Receipts/Payments Mismatch Issue".
 23 He referred to that at around the period of time
 24 which is 2010 and ongoing.
 25 One thing that is unclear from your evidence
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1 somebody dropped me a note, saying, "Can you
 2 look at this?" I hope if it was, we'd be able
 3 to find documentary evidence of that but it may
 4 very well have been a phone call.
 5 **Q.** Yes, and if I ask whether you recall being
 6 briefed, in other words being given a written
 7 document "Mr Turner, this is something you need
 8 to be aware of, this is the issue, we want you
 9 to do X action", do you recall getting anything
 10 like that?
 11 **A.** I'm sorry, I don't.
 12 **Q.** No. If someone were to send you such
 13 a document, who would that -- which team would
 14 have given you that kind of heads-up or that
 15 information?
 16 **A.** Well, I think considering that the action listed
 17 was against Julia Marwood, who was an attendee
 18 of that meeting, I would imagine that any
 19 interactions that I had had, and if there was
 20 an email trail, I imagine that would be from
 21 Julia to me.
 22 **Q.** Yes, because she's listed as being the owner of
 23 that particular issue, under her initials "JM"?
 24 **A.** That's right.
 25 **Q.** Yes. Excuse me one moment.
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1 so far is what were you actually told about that
 2 issue, the receipts/payments mismatch issue,
 3 around about that time? What were you told
 4 about it?
 5 **A.** I don't remember. I remember being told that
 6 there was an issue, having seen the document
 7 last week. But I don't remember exactly what
 8 I was told, whether the nature of that
 9 conversation was just as per the action point
 10 out of that meeting, can you check whether this
 11 would cause an issue with the profile that
 12 I managed at that time, the branch profile? But
 13 I'm sorry, I don't remember what I was told.
 14 **Q.** I am grateful, Mr Turner because your evidence
 15 was clearly hesitating -- you were hesitating in
 16 your evidence at the time regarding this and so
 17 it led to these questions, which is: what access
 18 did you actual have to this information?
 19 You refer to that as a conversation. Was it
 20 actually a discussion, an oral discussion or was
 21 this is an email discussion or some other means
 22 of discussing it?
 23 **A.** As I say, I don't remember and, using sort of
 24 "conversation" in a more informal context,
 25 I don't remember whether it would have been
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1 **A.** Sure.
 2 **MR STEIN:** Sir, I'm grateful, thank you.
 3 **SIR WYN WILLIAMS:** Thank you.
 4 Ms Page, I think, has a question.
 5 **Questioned by MS PAGE**
 6 **MS PAGE:** Thank you, sir.
 7 In your witness statement, Mr Turner, you
 8 note that because of a baseline faith in Horizon
 9 as a robust system, POL was perhaps not as
 10 attuned to concerns raised by SPMs as it should
 11 have been?
 12 **A.** Yes.
 13 **Q.** Can I just ask you about that when you were in
 14 your role when the Callendar Square bug was
 15 brought to your attention. I don't know if
 16 you're particularly aware of this, but in
 17 Scotland it was a rather different prosecutorial
 18 process and Post Office were not allowed to
 19 bring their own prosecutions; were you aware of
 20 that?
 21 **A.** I was not no.
 22 **Q.** Well, what we've obviously got here is
 23 a Scottish problem with a Sandra MacKay picking
 24 up the issue in Callendar Square in Falkirk. It
 25 was first noticed then in Scotland.
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1 A. Yes.
 2 Q. Does that make sense?
 3 A. It does.
 4 Q. Did you ever receive -- what I'm interested in
 5 is the possibility that people in Scotland were
 6 more attuned to the problems that subpostmasters
 7 faced because their experience of having to deal
 8 with third-party prosecutors may have made them
 9 more attuned, if that makes sense?
 10 A. I never received or had a conversation to
 11 suggest that, no.
 12 Q. Did you ever receive any problems like the
 13 Callendar Square bug type problem, or indeed
 14 problems generally? Did they ever come across
 15 your desk from area managers working in England
 16 and Wales?
 17 A. I don't recall any specific instances but
 18 I would expect, yes, there were cases from
 19 England and Wales. My role in terms of that
 20 escalation role covered the entire country, so
 21 it could come from any area of the country.
 22 Q. You described earlier in your evidence that the
 23 Callendar Square problem was perhaps somewhat
 24 unique. What was the qualities of it that made
 25 it unique?

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1 a significant problem in this way, in the way
 2 that the Callendar Square bug did?
 3 A. No.
 4 MS PAGE: Thank you. Those are my questions.
 5 SIR WYN WILLIAMS: Thank you, Ms Page.
 6 Is that it, Mr Blake?
 7 MR BLAKE: I believe that is, sir, yes, unless you,
 8 sir, have questions.
 9 SIR WYN WILLIAMS: No, thank you very much.
 10 Mr Turner, I'm very grateful to you for
 11 providing such a detailed witness statement in
 12 response to very many questions, and I am
 13 equally grateful that you've come before the
 14 Inquiry to give oral evidence. So thank you.
 15 THE WITNESS: Thank you, sir.
 16 SIR WYN WILLIAMS: I should say that in view of the
 17 fact that, as you will have gathered, there
 18 appears to be a glitch in the disclosure
 19 process. It is not inconceivable that you will
 20 be asked to return, but we will keep that under
 21 review, all right?
 22 THE WITNESS: Okay.
 23 MR BLAKE: Sir, shall we say 1.50?
 24 SIR WYN WILLIAMS: Yes, by all means Mr Blake, yes.
 25 MR BLAKE: Thank you very much.

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1 A. Unique in my experience, at least?
 2 Q. Yes.
 3 A. You know, I think it was -- in terms of my
 4 exposure, I'd not come across anything like that
 5 previously. I think I said in my witness
 6 statement that of the issues I dealt with during
 7 my time as network co-ordination manager,
 8 I didn't remember the details, but I still
 9 remembered that I'd dealt with this particular
 10 bug at Callendar Square.
 11 Q. But do you not particularly have memories of
 12 other bugs that you dealt with?
 13 A. No. I remember other issues with Horizon and
 14 other parts of the business but this, to me,
 15 would have been an unusual and anomalous kind of
 16 case, at least in terms of my exposure to it.
 17 Q. So in terms of your exposure, bugs of this
 18 nature were not raised to you at all from
 19 England and Wales?
 20 A. No, that's -- I'm not saying that I didn't have
 21 some issues raised, but I think -- I don't
 22 remember whether there were issues raised from
 23 England and Wales, but I would expect that there
 24 would be.
 25 Q. But they didn't stand out in your mind as

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1 (12.50 pm)
 2 (The Short Adjournment)
 3 (1.50 pm)
 4 MR STEVENS: Good afternoon, sir. Can you see and
 5 hear me?
 6 SIR WYN WILLIAMS: Thank you.
 7 MR STEVENS: If I may call Mr Blackburn.
 8 GARY DAVID BLACKBURN (affirmed)
 9 Questioned by MR STEVENS
 10 MR STEVENS: Mr Blackburn, as you know, my name is
 11 Sam Stevens and I ask questions on behalf of the
 12 Inquiry. Please could I ask you to state your
 13 full name?
 14 A. Gary David Blackburn.
 15 Q. Firstly, thank you for giving evidence to the
 16 Inquiry today and thank you for providing
 17 a written statement to which I'd like to turn
 18 now. Do you have a bundle of documents in front
 19 of you?
 20 A. I don't.
 21 Q. You don't. Right. Bear with me, I'll see where
 22 that is.
 23 Apologies, sir. We will just wait while
 24 that bundle arrives.
 25 SIR WYN WILLIAMS: Sure. Yes.

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1 **MR STEVENS:** Thank you, Mr Blackburn. Now, one of
 2 those bundles should have your witness statement
 3 at the front of it, behind tab A.
 4 **A.** Yes, got that.
 5 **Q.** Excellent, apologies for that and thank you. So
 6 that witness statement should run to 16 pages.
 7 **A.** Correct.
 8 **Q.** If you turn to page 15, you'll see paragraph 28
 9 being the last paragraph, and at the bottom is
 10 that your signature?
 11 **A.** It is.
 12 **Q.** Can I ask you to confirm that the facts within
 13 that statement are true to the best of your
 14 knowledge and belief?
 15 **A.** They are.
 16 **Q.** Thank you, Mr Blackburn, that stands as your
 17 evidence in the Inquiry. I am going to ask you
 18 some questions about that. You joined the Post
 19 Office in 1985?
 20 **A.** Yes, I did.
 21 **Q.** From 1985 to 1994 you worked, I understand, in
 22 Crown Office branches around Huddersfield?
 23 **A.** Correct.
 24 **Q.** Then in 1994, you were posted to the northeast
 25 regional office?

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1 pre-NBSC desk and pre-automation desks, what
 2 were the types of enquiries you would most often
 3 receive?
 4 **A.** It was very transactional in nature it was
 5 really supporting the branches in terms of "How
 6 do I complete it", particularly a transaction
 7 for a member of the public, interspersed with
 8 accounting queries but, as we may well end up
 9 discussing, nowhere near to the extent it was
 10 post-automation. That was the old paper-based
 11 cash account, which was relatively
 12 straightforward and simple to follow.
 13 We also supported the Retail Network
 14 Managers at the time in any enquiries that they
 15 may have had and we were also there as a bit of
 16 an emergency point of contact for events such as
 17 burglaries and robberies, that kind of thing.
 18 **Q.** What did you think of the quality of the advice
 19 and assistance that was able to be provided by the
 20 regional helpdesk in comparison to the national
 21 one?
 22 **A.** Yeah, it was, in my personal opinion, better,
 23 and purely based upon the fact that it was
 24 staffed with people who had similar career
 25 profiles to myself, so that all worked in the

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1 **A.** That's correct.
 2 **Q.** At that stage, you say in your evidence that you
 3 worked on a relatively new helpdesk that was
 4 created to support the region?
 5 **A.** That is also correct.
 6 **Q.** At this point, the Post Office was split into
 7 seven regions?
 8 **A.** It was.
 9 **Q.** You say that, subsequently, those individual
 10 regional helplines merged in to become what we
 11 now know as the Network Business Support
 12 Centre --
 13 **A.** That is correct.
 14 **Q.** -- or the NBSC?
 15 **A.** The NBSC, yes.
 16 **Q.** Do you remember when that was?
 17 **A.** It coincided with the introduction of the
 18 Horizon solution, so prior to that, it was --
 19 the northeast regional desk or the various
 20 regional desks were there pre-automation and
 21 then also for -- I think it was called the ECCO+
 22 system. So I'm fairly certain it was a part of
 23 a larger reorganisation of the Post Office and
 24 the introduction of Legacy Horizon.
 25 **Q.** Casting your mind back to when you worked on the

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1 branch network, primarily in the directly
 2 managed branches in the Crown Offices, but one
 3 or two of my colleagues at the time had also
 4 worked in the independent branches, so they had
 5 got a wealth of experience of completing the
 6 varied transactions that we had at the time in
 7 the business.
 8 **Q.** So when you say in the regional helpdesk, you
 9 pointed to the experience of the people within
 10 it as a strength.
 11 **A.** Yes.
 12 **Q.** Can you explain why that was different from the
 13 NBSC?
 14 **A.** Well, when -- so the regional helpline converted
 15 into the Horizon trial desk. So I was part of
 16 the trial desk then, which was run out of
 17 an office in Leeds. I think the branches in the
 18 trial were from both the Leeds and Bristol
 19 regions, I want to say. It was still very much
 20 the same group of people, albeit everything was
 21 new to all of us at that time, in terms of
 22 Horizon itself. But the business knowledge was
 23 still the same, the transactions were still the
 24 same, although completed in a different manner.
 25 As we moved then into what was the

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1 national -- the Network Business Support Centre
 2 and the national -- the only helpdesk for
 3 business enquiries, naturally we had to expand
 4 and recruit more people. We moved from Leeds to
 5 a greenfield site in the Dearne Valley, it was
 6 fairly isolated at the time. There was one or
 7 two other contact centres in the environment, so
 8 we picked up new recruits from the surrounding
 9 area, people, in effect, who had -- it was their
 10 first experience of working for the Post Office,
 11 they'd no prior experience.

12 So, for me, naturally, there was just
 13 a slight diluting of the quality of the
 14 individual on the desk, as they obviously that
 15 to go through a steep learning curve themselves.

16 Q. Is it fair to say there was a lot of
 17 institutional knowledge when moving to the NBSC?

18 A. That is my opinion, yes.

19 Q. For that reason, is it fair to say that, because
 20 of that loss of institutional knowledge, it was
 21 important to ensure that the new members of the
 22 NBSC were adequately trained?

23 A. Yes, vital. Yes.

24 Q. We'll come on to training shortly. Before I do,
 25 the pre-NBSC regional helplines, I appreciate

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1 calls that they were struggling to answer.

2 Q. When did you finish that role as a team leader?

3 A. I think -- now this is where chronology becomes
 4 quite hazy for me but I think it was -- I'm
 5 going to say around about 2001/2, I think, and
 6 I went down -- what was downstairs into business
 7 service management, as it was called at the
 8 time, and I --

9 Q. Pausing there, could you say what business
 10 service management's role was?

11 A. It's what I today would refer to as IT support,
 12 some vital processes, change management, problem
 13 management, secondary layers of incident
 14 management. Things like that.

15 Q. What was your first role?

16 A. I started as a problem manager when I first went
 17 down there.

18 Q. For how long did you hold that role?

19 A. Now, that's the bit I really can't recall. From
 20 memory, even looking through all of the
 21 documentation, I really have very little
 22 recollection of my time in that team. I don't
 23 think it was for very long, because I seemed to
 24 move on quite quickly into other incident facing
 25 and live service facing roles, so I'm sorry

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1 you can only speak for the northeast, but did
 2 they ever have any communication, the helpline
 3 as such, with people involved in bringing
 4 prosecutions against subpostmasters for false
 5 accounting or theft?

6 A. No, not at that time, no. It wasn't part of the
 7 remit.

8 Q. The same question, but in respect of auditors:
 9 was there any communication between the regional
 10 helpline and the audit teams?

11 A. I can't remember, if I'm honest. There may well
 12 have been, because regional auditing was a very,
 13 you know, business as usual part of everyday
 14 Post Office life. So there may have been. But
 15 it's not something I recollect.

16 Q. So in paragraph 4 of your statement, which we
 17 don't need to turn to, you say that you were
 18 a team leader on the NBSC. Could you just
 19 summarise, briefly, what that role entailed?

20 A. It was line management of a group of individuals
 21 who would be actually manning the telephones and
 22 taking the calls from the branches. When we had
 23 busy times, I would also take calls from the
 24 branches but it was providing a layer of people
 25 management and support and guidance for any

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1 I couldn't tell you.

2 Q. We'll come to those roles in a moment. In brief
 3 terms, could you summarise what your role as
 4 a problem manager was?

5 A. Yeah, and I think, as I've said in my statement,
 6 it felt, looking back with hindsight, reactive
 7 rather than sort of proactive, in the sense that
 8 we would literally take trends and analysis from
 9 the Network Business Support Centre, we'd also
 10 have it provided to us by the Horizon System
 11 Helpdesk and we would look for where there was
 12 any remediation activities that might be
 13 required to prevent future occurrences of
 14 whatever the incidents had been.

15 Q. Your role after problem -- we don't know the
 16 date, specifically, but what was your role after
 17 that of a problem manager?

18 A. So I -- this is where my career, I do apologise,
 19 becomes quite hazy, because I did so many roles
 20 including interspersed with taking parts in
 21 various programmes from a support perspective.

22 My next recollection was a live service desk
 23 recall, that's the key role that I remember,
 24 which was also a new desk which we'd set up at
 25 the time, an internal facing desk.

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1 Q. We'll come to that again in due course but, just
 2 for chronology purposes, you were transferred
 3 understanding TUPE to ATOS in 2014?
 4 A. That's correct.
 5 Q. Could you just explain what ATOS was doing at
 6 that stage for you to be TUPE transferred
 7 across?
 8 A. Yes, so ATOS in -- for me, in simple terms, it
 9 was Post Office outsourcing that -- what I'd
 10 just described as the business service
 11 management functionality and it was implementing
 12 a new operating model for management of Post
 13 Office's IT supply chain.
 14 Q. I understand you left that role in 2017 --
 15 A. I did, yes.
 16 Q. -- and you no longer work for the Post Office?
 17 A. That's correct.
 18 Q. Could we, please, turn up your witness statement
 19 on the screen. It's WITN04650100, and
 20 paragraph 10, please, on page 6. Thank you.
 21 You state that:
 22 "The purpose of the NBSC was to support the
 23 branch network through answering 'how do I'
 24 related transactional questions alongside the
 25 Fujitsu Horizon Service Desk ... which was there
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1 team leader?
 2 A. I think the only training that I remember was
 3 training on the Horizon solution. So there was
 4 no additional business training or anything like
 5 that. It was a standard counter training
 6 course, as it was at that time, which included
 7 use of the Horizon System.
 8 Q. Do you recall what that training involved?
 9 A. I'm sorry, I don't.
 10 Q. What about the new candidates, the people who
 11 hadn't the institutional knowledge that you had?
 12 Did they receive the same training or different?
 13 A. Number 1, I believe, you know, they received
 14 that element of training because the Horizon
 15 System was now ultra-important but they also
 16 received what I would call the standard Post
 17 Office training, as if they were going to work
 18 in a directly managed branch, for example.
 19 Q. Do you recall if there was ever updaters or
 20 refresher training given to members of the NBSC
 21 on how to use the Horizon System?
 22 A. Not specifically, no, I don't.
 23 Q. I'd like now to turn to the relationship between
 24 the NBSC and the Fujitsu helpdesk, which you've
 25 mentioned in your statement. Please can we turn
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1 to support the branch network with technical
 2 questions and queries in relation to the
 3 technology (Hardware, Software and Network) that
 4 had been provided."
 5 What do you mean by "How do I"
 6 transactional questions"?
 7 A. I mean literally a member of the public, being
 8 in the branch, wanting to conduct a particular
 9 transaction type and the branch not being quite
 10 sure how to do that. At the time of Horizon,
 11 that also involved, you know, what were more
 12 complex navigational type questions through the
 13 solution. So that was -- that is what I would
 14 refer to as "How do I complete this transaction
 15 for, you know, an item going overseas" or
 16 something to that effect. That was the type of
 17 things we did.
 18 Q. That document can come down for the time being.
 19 Thank you.
 20 I think you've mentioned already a large
 21 part of the NBSC's role was to assist with
 22 balancing as well.
 23 A. Very much so, yes. Yes.
 24 Q. What training did you receive on joining the
 25 NBSC to enable you to carry out your role as
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1 up FUJ00080405.
 2 This is the "ICL Pathway/Post Office Counter
 3 Limited Interface Agreement for the Network
 4 Business Support Centre and the Horizon System
 5 Helpdesk". If we could turn to page 4, please,
 6 towards the bottom. Under "Contributors" we can
 7 see that you -- the name on the right towards
 8 the bottom, you contributed towards this
 9 document?
 10 A. Yeah.
 11 Q. Do you recall the level of input you had on it?
 12 A. I don't but I would assume, given my role at the
 13 time, it was one really, you know, coming from
 14 a point of managing a team of people who might
 15 possibly have to interact with the Horizon
 16 Service Desk or exchange ownership of
 17 an incident that had been logged.
 18 Q. Please can we turn to page 7 of that document.
 19 So section 5 sets out general responsibilities,
 20 and under (h) it says -- I'll summarise -- Post
 21 Office Counters Limited and ICL Pathway:
 22 "... are responsible for ensuring that known
 23 problems or events, that may impact on the
 24 everyday business of NBSC and HSH, are made
 25 known to both helpdesks."
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1 Can you recall how the bodies, the NBSC and
2 the Horizon Service Helpdesk, communicated with
3 each other regarding problems with the Horizon
4 System.

5 **A.** At that time, when we were talking of Legacy
6 Horizon, as opposed to HNG-X, the two desks were
7 very distinct, in fact the responsibility, in
8 effect, had been passed to the branch network to
9 determine which number they rang and, therefore,
10 who they spoke to. So I do remember there being
11 a lot of interaction between the two desks in
12 terms of swapping ownership. We also had -- the
13 NBSC had an admin team that, if there was
14 a wider sort of unplanned event that was
15 impacting either desk or a large volume of calls
16 suddenly started coming into the desk, they
17 would take the responsibility for the interface
18 and the communication.

19 I don't really remember anything further,
20 I'm afraid.

21 **Q.** Well, it may help assist your memory if we look
22 at page 16. Section 9 describes daily
23 interactions, which I don't need to trouble you
24 with but, if we can go to 10 the "NBSC/HSB
25 Review Forum" says:

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1 service management function, a second level of
2 incident management and problem management, for
3 them to investigate and determine whether or not
4 there was something deeper that needed Fujitsu
5 support and investigation.

6 It was very contact centre focused, was the
7 NBSC/HSB and the reviews.

8 **Q.** So when you said it would -- if there was
9 a problem -- you feared problem with the system,
10 it would be passed to a different team. Would
11 that be the Problem Management Team?

12 **A.** It would have been and if it would have gone in
13 a much more timely manner. It would have gone
14 at the time that the event occurred rather than,
15 you know, post-monthly review.

16 **Q.** Your evidence is, to the best of your
17 recollection, this review forum mainly concerned
18 maybe operational contact centre elements of
19 types --

20 **A.** Volume of calls, types of calls, absolutely, to
21 see whether there was a need to produce
22 knowledge articles for the advisers in the NBSC,
23 or perhaps even suggest that there may be
24 reminders that need to go in the Counter News
25 article out to the wider network but not really

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1 "The performance of work undertaken across
2 the NBSC/HSB interface will be the subject of
3 monthly review. The output of the review forum
4 will provide input to:

5 "The Horizon Service Review Forum."

6 **A.** Right.

7 **Q.** Were you involved or do you recall being
8 involved in these monthly reviews?

9 **A.** I don't but, given my role, I would be very
10 likely to have been involved in at least some of
11 them, yeah.

12 **Q.** I'll ask the question but I can see the answer:
13 you don't recall the types of matters which
14 would have been discussed in these meetings?

15 **A.** It would have been primarily contact centre
16 focused, I would imagine. But it wasn't really
17 the -- as I recall, it wasn't really the forum
18 for raising of concern around, let's say, the
19 performance of the solution. If we'd have had
20 an incident that we couldn't answer with the
21 information that we had and the knowledge that
22 we had on the desk and we felt it was the
23 system, let me say, not working in the way we
24 had understood it should work, we'd have passed
25 that, at the time, down into the business

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1 focused at all on the technology.

2 **Q.** Another purpose of this document was to
3 delineate the role, which calls would go to the
4 NBSC and which to the Horizon or the HSB, later
5 HSD. Can we turn to page 18, please, which
6 should be an appendix. Yes, that's right, it's
7 not formally an appendix but this is the table
8 I was looking at. We see here, on the left
9 column "Postmaster Incident", and the first two
10 are "[unable] to log on" and, if it was because
11 of a system failure or user error the Horizon
12 Service Helpdesk would deal with it but, if it
13 was a lost password, we see the third line, it
14 was the NBSC. So this was separating those
15 roles.

16 The last entry "Cannot use the Horizon
17 counter system or part of the system" refers to
18 matters such as -- sorry, we'll just wait for
19 that to come back on screen. Thank you.

20 The last entry, here we're talking about
21 monitor failure or equipment failure, which
22 results in the subpostmaster not being able to
23 use the system and that's clearly a helpdesk
24 issue, a Fujitsu issue.

25 **A.** Yes.

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1 Q. Can we turn to page 20, please. The bottom two
 2 entries, one says, "Has an EPOSS discrepancy"
 3 and the next is a weekly one. That's referring
 4 to an issue in the cash account when balancing,
 5 isn't it?
 6 A. Yes.
 7 Q. In both cases, it says the first contact is the
 8 Fujitsu helpdesk, and the comment says:
 9 "HSH are responsible for assisting the PM in
 10 the correction of the discrepancy. However, if
 11 HSH cannot resolve an EPOSS discrepancy the PM
 12 will be referred to NBSC for approval to accept
 13 the discrepancy."
 14 In both situations, the sole cause is listed
 15 as "user error". Can you explain why this
 16 document doesn't refer to what to do if there's
 17 an EPOSS discrepancy caused by the Horizon IT
 18 System?
 19 A. No, I can't. All I can say at the time, and
 20 this is a long time ago when we were first
 21 automating the network, there was no belief or
 22 understanding at my level, at my operational
 23 level, at my team's level, that there was any
 24 reason to distrust the technology. So, you
 25 know, we were told quite clearly, in fact on
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1 were asked to do on a daily basis.
 2 Q. You've mentioned Don Grey. Are you aware of
 3 whether this message that Horizon was robust,
 4 did that -- are you aware whether that came from
 5 any higher than Don Grey?
 6 A. I'm sorry, I couldn't say.
 7 Q. You said as well in your evidence that it wasn't
 8 just then that message was repeated.
 9 A. Yes.
 10 Q. Can you provide other examples? I know we're
 11 jumping ahead but other examples of when you
 12 were told that the system was robust?
 13 A. Well, I guess as well there was a -- I suppose
 14 I've got to try and convey the -- and give
 15 context. So, you know, it was a massive
 16 transformation for the Post Office from manual
 17 to automation. Of course, we were all
 18 understanding of it was that or Post Office
 19 ceases to be relevant and probably exist. So we
 20 understood the journey and the strategy. We
 21 didn't go into it doubting it, I guess, is what
 22 we were saying. We went into it accepting that
 23 it was going to work. No reason to challenge it
 24 at that stage.
 25 Now, over time, evidence obviously started
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1 numerous occasions throughout my time, that
 2 there were no Horizon integrity issues, and
 3 there were no systemic issues. So at the time,
 4 I think the stance would probably have been the
 5 solution works as per Post Office's
 6 requirements, as per the design, therefore there
 7 wouldn't be -- such a situation arise, I'm
 8 assuming that would have been the stance,
 9 rightly or wrongly.
 10 Q. At this time, can you recall who was saying or
 11 telling you that the system was robust? So this
 12 is in 2000?
 13 A. I can't be specific but I'd have to say the
 14 wider business. I can't remember the names of
 15 the senior managers or the leaders of the
 16 programme and the rollout, I'm afraid, at the
 17 time, although I do remember Don Grey because
 18 Don Grey was northeast regional office so that's
 19 where I came across Don. I knew he had some
 20 role to play within that.
 21 But the general message was one, which I can
 22 understand, even looking back, of trying to
 23 ensure that, you know, operational people had
 24 confidence to go about the processes that we'd
 25 been -- that had been implemented and what we
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1 to came in. We had improved knowledge, improved
 2 experience over that same time frame, so,
 3 therefore, we became much more comfortable with
 4 our ability to question or challenge or
 5 certainly escalate to Fujitsu to investigate
 6 something when it wasn't working correctly.
 7 Legacy Horizon, that was incredibly difficult
 8 because of the, you know, the steep learning
 9 curve that we were all on. Probably not brave
 10 enough either, if I'm honest, looking back to
 11 challenge some of the things when maybe we
 12 weren't sure.
 13 So I can think of, when it started to be in
 14 the press, when there were postmasters who were
 15 starting to take, I think, personal litigation,
 16 then, I think, there were more frequent messages
 17 to reaffirm that Horizon was robust, Horizon
 18 integrity was there and there weren't issues.
 19 I think there was also a third party -- I think
 20 it was called Second Sight -- enquiry. Even
 21 post that I remember the message being the same,
 22 and I think there were also subsequent internal
 23 inquiries undertaken, and I might be in HNG-X
 24 chronology now, to also check -- and I think
 25 that might have been done from my colleagues in
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1 Product and Branch Accounting, I can't remember
2 the names of any of the individuals, I'm afraid.

3 And that also confirmed -- and those
4 messages were filtered down to the operational
5 teams.

6 Q. Actually, we'll come to that bit of the
7 chronology later on. Back to 2000, when this
8 document was being created and the message
9 was -- and I think you said the belief was that
10 the system was robust.

11 A. Yes.

12 Q. Do you accept that document is one of many which
13 is setting up support services that were to be
14 made available to subpostmasters using the
15 Horizon Helpdesk --

16 A. Yes.

17 Q. -- or the NBSC?

18 A. Yes.

19 Q. Is it fair to say that those systems that were
20 put in place to provide assistance to them, were
21 built on an assumption that the Horizon System
22 was robust?

23 A. Correct.

24 Q. Moving, then, to knowledge sharing within the
25 NBSC. We're going to come to some examples of

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1 Now, naturally, if there was something fresh
2 or new came in that was slightly unexpected or
3 the timing wasn't great in terms of internal
4 communications, there would sometimes be a gap
5 between the Go Live of that, say, new
6 transaction or that knowledge, whatever it was,
7 and the creation of that knowledge article. So
8 that's where we fell back on the more manual
9 methodologies that I just mentioned, which would
10 really be ensuring people were informed word of
11 mouth, emails and bulletin boards.

12 Q. Do you recall when this change occurred, when it
13 was mandatory to rely on knowledge articles?

14 A. I think it was after I had gone down to the
15 business service management function and, in
16 fact, myself and one of my colleagues, Shaun
17 Turner, were involved in supporting the initial
18 set-up of a number of, you know, existing
19 processes in terms of the documentation.

20 Q. Could you just describe what a knowledge article
21 looks like?

22 A. It would literally be a Word document. It was
23 put on to the Remedy -- it sat independently but
24 accessed via what was the call log-in system,
25 the Remedy system. It could involve anything.

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1 problems later on. It's uncontroversial that
2 there were problems in the Horizon IT System.
3 As a matter of generality, how -- when someone
4 in the NBSC at the top became aware of
5 a problem, how was that shared amongst the other
6 members of the team?

7 A. Within the NBSC environment itself?

8 Q. Yes.

9 A. It was verbally cascaded. We also had bulletin
10 boards, or there was *ad hoc*, infrequent team
11 meetings where the information was provided.
12 Now, I can't remember the exact introduction but
13 I don't think it was at the very, very beginning
14 of the NBSC, but we also introduced knowledge
15 articles, and those knowledge articles
16 ultimately, over time, became, I would say,
17 mandatory in terms of their usage.

18 You had to use a knowledge article. You had
19 to associate the call that you'd had, the ticket
20 that you'd logged, with the knowledge article
21 that you had used to advise and guide the
22 caller. And there was a team of people set up
23 to produce those articles, manage those
24 articles, maintain those articles. So that was
25 the other method.

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1 It could involve *Counter News* articles that were
2 literally just almost copy and pasted into
3 an electronic format. It could involve process
4 flow maps with, you know, swim lanes in terms of
5 start and finishing and different people might
6 need to be -- interact or involved. It could
7 involve diagrams. There were pictorial evidence
8 as well to show what screens looked like in
9 terms of trying to guide the NBSC agent and the
10 office.

11 Q. To what extent were the use of scripts used in
12 the NBSC, call scripts?

13 A. There may have been a script on occasion.
14 Normally, I would have said that would come off
15 the back of an unplanned event of some
16 description, something that's happened untoward
17 and, therefore, there would be a scripted
18 response given. I don't actually remember
19 a time where we were told quite, you know,
20 precisely to follow, almost word for word,
21 a script, but that would be the situation, where
22 we'd have something that was perhaps more
23 temporary in nature than the more permanent way
24 of responding to the enquiries.

25 Q. So perhaps in response to a major incident?

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1 A. Perhaps response to a major incident yes,
 2 something that's occurred that branches may call
 3 in about and need to be aware of.

4 Q. Were you ever aware of subpostmasters being told
 5 by members of the NBSC that they were the only
 6 person experiencing problems using the Horizon
 7 IT System?

8 A. No. I mean, that's not something I certainly
 9 would have told my team. That sounds -- I'm
 10 offering an opinion here but that sounds
 11 slightly rogue to me, rather than anything that
 12 would have been directed.

13 Q. That's internally to Post Office. Were you
 14 aware of anything along the same lines being
 15 communicated to people working on the Fujitsu
 16 helpdesk?

17 A. No, I didn't really have a great deal of
 18 visibility of their internal ways of working.

19 Q. I want to move now to your problem management
 20 role, and please can we been up paragraph 5 of
 21 your witness statement on page 2. I'll read the
 22 last line and then go over the page. What you
 23 say is:
 24 "But what I do remember is that the role was
 25 largely reactive in nature not particularly
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1 happen.
 2 So to start off with, the problem management
 3 role in my time was very much just simply
 4 reacting to what had already occurred.
 5 Hopefully, we would learn from that lesson,
 6 though, and increase and mature over time in
 7 terms of the ability to look out for certain
 8 things and prevent things from being repeated.
 9 That's kind of what I mean about it being
 10 largely reactive at the time I was the problem
 11 manager.

12 Q. In your role as problem manager, would you have
 13 benefited from more internal technical support,
 14 technical IT support?

15 A. Oh, without doubt. I have no personal technical
 16 background whatsoever: Post Office man and boy,
 17 business training. Yes, I could answer
 18 transactional queries and help postmasters, I'd
 19 done the job. Technology-wise, no. I felt that
 20 we were in a position where Fujitsu were the
 21 chosen supplier. If we needed to go to Fujitsu,
 22 I'd go to Fujitsu. Whatever Fujitsu came back
 23 with, it was incredibly difficult to challenge,
 24 if at all, if it was technical.
 25 If it didn't feel right, if there was
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1 predictive or preventative and therefore a lot
 2 of the work that I would have undertaken
 3 alongside my colleagues came from analysis of
 4 the calls that had been received by the NBSC or
 5 thematic incidents."

6 In general terms, what were the types of
 7 problems that you were seeking to analyse from
 8 these call records?

9 A. You were looking for any trend at all in terms
 10 of a volume of call, a particular type of call,
 11 business in nature, potentially technical in
 12 nature and absolutely in relation to accounting.
 13 Anything that might indicate there was a way of
 14 us operating better, doing something better or
 15 something potentially that needed fixing.

16 Q. When you say the role was not particularly
 17 predictive, what do you mean by that?

18 A. I think -- again, I come back to a bit of
 19 a chronology and a bit about the learning curve
 20 and everyone being, you know, on the same
 21 journey, very difficult back in the time -- in
 22 the day, when I think about it. I guess I'm
 23 trying to suggest that we probably had limited
 24 capability of predicting what might happen and
 25 we were learning through experience what could
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1 something that wasn't sitting well with you, we
 2 had a few strategic individuals in the business
 3 that we could go to and ask them to have a look,
 4 people like Ian Trundle and Bob Booth are two
 5 people I know particularly supported me, not
 6 necessarily with accounting issues but with
 7 certainly large-scale geographic incidents that
 8 we had, but no, we were very much trusting the
 9 supplier for the technical knowledge.

10 Q. Just on that, please could we bring up page 5 of
 11 your witness statement and the paragraph at the
 12 top. I think this relates to evidence you just
 13 gave. You say that:
 14 "The Post Office IT function did have a team
 15 of Business Relationship Managers run by Chris
 16 Taylor that were technical."

17 A. Yes.

18 Q. Just to clarify, those are different, are they,
 19 from the managers, the contract managers who --

20 A. Oh yes. Yeah, yeah, those guys were all based
 21 down in London. They were very much working
 22 with the business from an innovation and
 23 a future transactional perspective but all of
 24 them naturally very technical in understanding
 25 in terms of the Horizon System. So they weren't
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1 there for us to be used on the process. You
 2 won't find it written in a document, you know,
 3 "Escalate to Chris or the team", but we did lean
 4 on them when we felt it was necessary.
 5 **Q.** Again, you refer to Ian Trundle and Bob Booth.
 6 You say:
 7 "Whilst also supportive, these
 8 individuals/teams were primarily strategically
 9 focused and not designed to be regularly engaged
 10 in the operational day-to-day running."
 11 What do you mean by "strategically focused"?
 12 **A.** On next steps, on the future, on development of
 13 software, it tended, as I say, to be linked to
 14 my knowledge to business activity, rather than,
 15 you know, focusing entirely on the technology.
 16 But they were the people who would, from my
 17 perspective, interact with Fujitsu on a very
 18 regular basis in terms of how of the solution
 19 worked. I'm sure they were both involved in
 20 an awful lot of programme activity and an awful
 21 lot of determining Post Office's requirements of
 22 the technology.
 23 **Q.** Did you ever request at the time for more IT,
 24 internal IT support on the operational
 25 day-to-day matters to be able to test what
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1 FUJ00079946. This is "[Post Office Account]
 2 Customer Service Major Incident Escalation
 3 Process". Is this something you would have
 4 worked towards -- well, worked with when dealing
 5 with major incidents?
 6 **A.** Yes, I'm fairly sure, looking at the Post Office
 7 distribution list, those two gentlemen were
 8 either my line managers at one point in time or
 9 line manager's line manager, so Dave Hulbert and
 10 Richard Ashcroft.
 11 **Q.** Can we turn to page 7, please. I should say
 12 that document was dated 3 October 2006. Under
 13 the heading "Process Objective", the fourth
 14 bullet point says one of the objectives was to:
 15 "Avoid unnecessary alerting of the
 16 customer."
 17 In this context, who was the customer:
 18 a subpostmaster or the Post Office itself?
 19 **A.** My reading of that would have been "clients"
 20 would be another way of looking at it. So at
 21 the time a major one was -- well, they were
 22 Alliance & Leicester at the time, I think. So
 23 I think it's referring to them rather than to
 24 the branch network.
 25 **Q.** I see. So the clients of the Post Office.
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1 Fujitsu was saying to you?
 2 **A.** No, I don't believe that we did. Again, that
 3 sort of stems from a belief of there were no
 4 issues with the Horizon System. So back in HNG
 5 or Horizon Legacy, I think you refer to it, it
 6 was part of the learning curve again. So it
 7 just didn't really necessarily occur at the
 8 time.
 9 **Q.** I'm going to come on now to some of the
 10 processes involved in problem management and we
 11 have a distinction between incident management
 12 and problem management.
 13 **A.** Yes.
 14 **Q.** The Inquiry has heard evidence that incident
 15 management relates to dealing with the symptoms
 16 of a particular issue such as a server failure,
 17 whereas the problem looks at the underlying
 18 causes of the incident. Do you broadly agree
 19 with that?
 20 **A.** Yes. My role in incident management, we always
 21 focused on service restoration and then, you
 22 know, ideally we'd identify the root cause but,
 23 if not, that was always part of problem
 24 management's job once handed off.
 25 **Q.** Please could we bring up the document
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1 **A.** Yes.
 2 **Q.** What do you understand then of the purpose of
 3 "avoiding unnecessary alerting"?
 4 **A.** It just doesn't sound right, does it, when
 5 I read it today at all. I'd be guessing, to be
 6 perfectly honest. I'm not entirely clear. It's
 7 a bit ambiguous, isn't it? I don't know if it
 8 was just purely wanting to protect brand.
 9 **Q.** We have the last, and four bullet points up:
 10 "Demonstrate to the Post Office a more
 11 professional approach [and]
 12 "Improved governance."
 13 Had there been, before this document, what
 14 was perceived to be a lack of a professional
 15 approach from Fujitsu, from your perspective?
 16 **A.** I don't actually know, if I'm honest, because
 17 this -- is this 2006? Sorry.
 18 **Q.** I think if we can just come just to double
 19 check, if we can come out to the full page,
 20 please. Thank you. Ah, sorry, 27 June 2005.
 21 **A.** It's near enough, isn't it? No, if I'm being
 22 honest, and it is recollection, no, I don't
 23 remember there being poor governance. Perhaps
 24 on occasions communication was inconsistent, if
 25 we want to look at it that way. But I don't
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1 remember there being governance issues, but it
2 might be a more appropriate question for David
3 Hulbert or Richard Ashcroft.

4 **Q.** Could we turn to page 8, please. The bullet
5 point at the bottom of this -- well, the
6 penultimate one now, says:

7 "The Fujitsu Service Delivery Manager (or
8 Duty Manager out of hours) is responsible for
9 communicating both up the Fujitsu Organisation
10 and across (see appendix A) to their counterpart
11 in POL."

12 Now, in your experience of dealing with
13 incident management, did you feel that Fujitsu
14 kept you or the Post Office appropriately aware
15 of any incidents as they arose?

16 **A.** Well, they certainly made us aware of the
17 incidents when they arose. It would be
18 difficult, I guess, for me to second-guess that
19 and challenge whether or not it was always done
20 in a timely manner or whether it was always
21 exactly what they knew at the time. It would
22 be -- the communication, basic communication,
23 ie would they call our duty manager out of hours
24 to tell us there was an issue? The answer's
25 yes.

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1 example a single counter post office which is
2 unable to transact, regardless of its business
3 volumes, is rated as a severity A."

4 It then goes on to say:

5 "For simplicity, Incidents are classified
6 into three impact levels", and uses high,
7 medium, low.

8 Did an incident have to be a high impact to
9 be a major incident?

10 **A.** I think this is where -- I think the answer is
11 yes and no and sorry for that but the way
12 I remember the incident process management
13 working was it's based upon knowledge and
14 information at the time so it would be perfectly
15 reasonable for us on occasions to have what
16 might turn out to be false alarms that have been
17 raised through that way and a decision taken by
18 Fujitsu in the first instance that it was
19 a high, and therefore the process followed and
20 it might end up high and remain high
21 post-understanding what the impact was,
22 resolution and root cause.

23 Equally, you know -- or conversely, it could
24 work the other way -- it could turn out that
25 a decision was made by the Fujitsu duty manager

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1 **Q.** Well, at the time, do you recall having any
2 concerns that, to put it bluntly, you were being
3 kept in the dark about any incidents?

4 **A.** I don't have any particular evidence but, on
5 occasions, when you finally ended up with the
6 full root cause analysis and the full
7 documentation of the events, the timeline,
8 et cetera, there would be an ability to reflect
9 and think that it hadn't been your experience,
10 in terms of the timing of, in terms of the
11 quality of the information you were being
12 provided.

13 **Q.** When you say "on occasions", how often would
14 that be?

15 **A.** Rarely. Rarely.

16 **Q.** Could we please turn to page 9. Under "Incident
17 classification", it says:

18 "As a general rule a Major Incident will
19 always be an incident rated with severity level
20 A (critical) in the POA Customer Service
21 Incident Management Process Details document ...
22 However not all incidents rated as severity
23 level A qualify. This is because the severity
24 levels do not necessarily translate to the
25 global business impact on POL's business. For

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1 that the incident was medium or low, and it
2 might not have been rung through but,
3 subsequently, called through the following
4 morning, often triggered by calls from the
5 branch network, for example.

6 **Q.** If the incident wasn't declared a major incident
7 and just an incident, how did that affect the
8 way it was investigated?

9 **A.** It would be timing, more than anything, in terms
10 of waiting for the next -- you know, the
11 following working day, excluding weekends, as
12 well, so there could be some significant delay
13 if a wrong diagnosis was made in the first
14 instance. But that would never stop.

15 It's that thing about reacting and
16 predicting and preventing again. You get into
17 that kind of scenario where you might have been
18 able to look back and think we could have done
19 something sooner if it had been identified as
20 high and therefore communicated.

21 But branches, you know, if they were open
22 and they didn't have the ability to trade, they
23 would call into one of the two desks. That in
24 itself could also then trigger what would turn
25 out to be the major incident management

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1 response.
2 **Q.** Looking at problem management, if we could go to
3 FUJ00079886. This is 23 December 2002, "Fujitsu
4 Services/Post Office Limited Interface Agreement
5 for the Problem Management Interface", which is
6 presumably a process you would have used as
7 a problem manager?

8 **A.** Yeah, I think that's about the right timing.
9 Yes.

10 **Q.** Can we turn to page 7 of this document and,
11 under 5.3, there is "Fujitsu Services specific
12 responsibilities". It says:

13 "Fujitsu Services will update the problem
14 Management Database daily (as problems are
15 updated).

16 "Fujitsu Services will provide POL with
17 remote access (via dial up) to the Fujitsu
18 Services problem management database."

19 Do you recall whether, in your time as
20 a problem manager, you had access to that
21 Fujitsu database?

22 **A.** Yes. I've got to say it wasn't the best
23 experience. I seem to remember we had two
24 machines that allowed us that dial-up access to
25 the tool, but it was a way of audit trailing and

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1 document. Under section 11.1, it refers to a:
2 "... Cross Domain Problem Management Forum
3 [being] held monthly prior to the Service
4 Management Forum ... and is intended to
5 highlight and discuss all problems if time
6 allows."

7 Would you have attended that?

8 **A.** No, I don't think I did, actually. Because of
9 the age of the document, I was relatively new to
10 the team and junior, therefore. Some of names
11 on the front of the document I recognise,
12 I notice Stephen Potter's name there, for
13 example. He was a colleague of mine. He would
14 have been much more likely but I would have said
15 I do think it was Richard Ashcroft that was
16 managing this team at the time, and Bethany
17 Newton, that would have been their forum.

18 **Q.** The last sort of process I wanted to go over
19 which I've been asked to go over with you is the
20 branch issue management process. Can we please
21 turn up FUJ00080015. So this describes the
22 branch issue management process. Do you recall
23 the role of the Fujitsu branch issue management
24 process?

25 **A.** Only very high level. I certainly remember many

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1 recording updates to whatever the problem record
2 was. It wasn't -- you know, you had to get up,
3 if you like, and go sit there and go and look
4 for an update, though often, is how I felt about
5 the process rather than receipt of an email,
6 receipt of a phone call, there's an update in
7 the problem record or things like that. But
8 that might be my memory and just my
9 recollection.

10 **Q.** Did you consider that the information on
11 problems stored within it at the time was
12 adequate for your purposes as a problem manager?

13 **A.** I'm going to have to say yes but that is not
14 based upon an awful lot of recollection. You
15 know, I can't think of any particular instance,
16 for example, that would allow me to be more
17 specific but certainly, you know, the basic
18 intention was that the update would be provided
19 for and, you know, if it wasn't appropriate,
20 I certainly would have expected to have been
21 challenging it and/or escalating it.

22 **Q.** Was this another point when you were relying on
23 Fujitsu's technical expertise?

24 **A.** Oh, totally, yes. Yes.

25 **Q.** Please can we turn to page 12 of the same

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1 dealings with Nick Crow in particular. But for
2 me, the difference for this role was it was
3 meant to be much more proactive, from Fujitsu's
4 part, in regards to actively going out and
5 looking for issues. Again, I'm sure Nick would
6 use lots and lots of helpdesk data to guide him
7 and help him, but he would be very, very field
8 based in regards to his role. Network more than
9 accounting discrepancies being, what I remember,
10 are lots and lots of challenges with the various
11 network methodologies that we used at the time
12 and Nick was an expert in that area and
13 particularly assessing the geographical location
14 of the branch environment which could, on
15 occasions, cause issues with the connectivity.

16 **Q.** So just to clarify that, when you say "network"
17 rather than "accounting", does it mean, in your
18 experience, this process was looking more at,
19 say, issues where a rural branch may not be able
20 to connect to the servers rather than
21 a balancing discrepancy?

22 **A.** I think the scope would include both but my
23 recollection was that volume-wise would be much,
24 much more challenging and high numbers of
25 network connectivity issues than accounting.

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1 Q. Can we turn to page 12 of the document, please.
 2 At the top, the Proactive BIM process. It says:
 3 "The BIM is also responsible for analysing
 4 trends and anomalies experienced at Branch
 5 level. The BIM will review the monthly
 6 statistics, ie the Branch League Tables to
 7 identify exceptionally high instances of call
 8 numbers from Branches or other possible
 9 indicators of potential issues."
 10 Did you or anyone at Post Office have access
 11 to the branch league tables?
 12 A. Not that I recall. It might have been something
 13 we'd have done similar from an NBSC perspective.
 14 I don't actually remember having visibility of
 15 Fujitsu's branch league table. That's not to
 16 say that I didn't. I just can't really
 17 remember.
 18 Q. So these sort of issues, where there's problem
 19 management, incident management and this
 20 process, the BIM process, how did that work, or
 21 the problem management team's work feed into the
 22 NBSC and the advice that the members of that
 23 team would provide?
 24 A. Of course, all of the roles are supposed to
 25 interact and share knowledge, share information,
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1 that they were informing the NBSC of -- or
 2 advising the NBSC at a later stage of the
 3 benefits of a new knowledge article or updating
 4 an existing.
 5 Q. Was there a risk or did you think there was
 6 a risk at the time that this knowledge wouldn't
 7 be passed on to the NBSC without a co-ordinating
 8 role?
 9 A. I think on reflection, yes, there would have
 10 been definitely been a risk that some
 11 information may not have -- may have been lost
 12 in translation or may not have been communicated
 13 or articulated in a way that it meant to be. So
 14 it's entirely possible.
 15 Q. Are you aware if the training for members of the
 16 NBSC was ever updated to take account of
 17 findings or information gleaned through the
 18 problem management process?
 19 A. I'm not. Post my time, I believe I'm correct in
 20 this, the NBSC was, in effect, outsourced,
 21 albeit to Royal Mail. They were the owners of
 22 Dearne House, they provided a range of contact
 23 centre services to other clients of theirs, and
 24 were perceived as contact centre experts. So
 25 once that was relinquished, if you like, as
 163

1 update as I mentioned earlier, knowledge
 2 articles, for example, ensure that end users on
 3 the helpdesk were appropriately informed of
 4 anything that was particularly important, out
 5 there at the moment, major incidents.
 6 Incident management was, for me, very much
 7 what it sort of says on the tin: it was service
 8 restoration, hand off, root cause, problem
 9 management.
 10 BIM was very much more, as I say, proactive
 11 is how I thought about it but Nick and the team,
 12 I feel, would interact with any relevant section
 13 of the Post Office. So if what Nick had have
 14 found or was asked to investigate was accounting
 15 discrepancies, for example, it's just as likely
 16 that he would have been involved with Product
 17 and Branch Accounting within the Post Office as
 18 he would be the business service management
 19 function.
 20 Q. But are you aware of a person within the Post
 21 Office who was to draw all of that information
 22 together to provide it to the NBSC to update the
 23 knowledge articles, and things like that?
 24 A. No, no. I'm sorry, I'm not. I think it would
 25 have fallen to each functional area to ensure
 162

1 a service, they, in effect, became another
 2 supplier to the Post Office and I think they
 3 were managed accordingly. I can't comment on
 4 Post Office's contribution to training for those
 5 agents post that time.
 6 Q. In your recollection, when did that transfer
 7 occur?
 8 A. It would be a wild guess, I'm afraid, but I'm
 9 going to say around about, I think, 2006/7 might
 10 be the time frame.
 11 Q. The same questions really about these findings
 12 that problem management would make or incident
 13 management would make. How were those
 14 findings -- let me rephrase that, sorry.
 15 Was there one person who would be
 16 responsible for cascading that information to
 17 the people responsible for prosecuting
 18 subpostmasters?
 19 A. I don't know the name or whether they would but
 20 I wouldn't have expected it to have been the
 21 individual problem managers. I would have
 22 expected it to have been the leadership of that
 23 function.
 24 Q. When you were a problem manager, were you ever
 25 approached by anyone in the team responsible for
 164

1 prosecuting subpostmasters to provide
 2 information on potential problems in the Horizon
 3 IT System?
 4 **A.** I remember receiving requests to investigate
 5 and, therefore, engage Fujitsu, gather evidence
 6 potentially from the branch in regards to, you
 7 know, trial balances, et cetera, transaction
 8 logs and relay that information. So I certainly
 9 remember having those on occasion. I do, from
 10 perception, believe that they were quite low in
 11 comparison to the other types of problems that
 12 we handled at the time. But I don't then have
 13 any recollection, I'm afraid, at all about what
 14 happened post the conclusion of that problem,
 15 particularly if it was inconclusive, perhaps,
 16 rather than a very black and white response from
 17 Fujitsu that declared that the system was
 18 working as per design and, therefore, there was
 19 no issue.

20 Those would go back to, I don't know who
 21 would send them, but they would go back to and
 22 be due to go back to the appropriate retail
 23 network manager.

24 **Q.** So you might have -- your evidence is you might
 25 have or you remember someone involved in

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1 and Branch Accounting who, you know, naturally
 2 had visibility of the general accounting
 3 procedures, the records for every single branch
 4 in the network.

5 **Q.** Again, I apologise if I misheard this but
 6 I asked about someone in the prosecution team
 7 asking you directly for that broader
 8 information --

9 **A.** No.

10 **Q.** -- I think you said no. You then pointed to
 11 Retail Network Managers.

12 **A.** Yes.

13 **Q.** I think again you gave examples of when it would
 14 be specific cases that they would ask you about.
 15 Do you recall the Retail Network Managers ever
 16 asking you proactively and broadly about general
 17 problems in the Horizon IT System?

18 **A.** Not proactively. It would be off the back of
 19 them being approached by a branch or them
 20 noticing a trend within a branch. Sorry, if
 21 I've understood that question, they would react
 22 to the knowledge and then becoming aware of
 23 a situation that they felt warranted further
 24 investigation.

25 **MR STEVENS:** Sir, that might be a suitable time to

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1 prosecutions asking you about particular cases.
 2 Do you have any recollection of a more proactive
 3 approach of someone in the prosecution
 4 department saying, "Can you provide us
 5 information generally on problems in the Horizon
 6 IT System?"

7 **A.** Not that I can remember but all of those types
 8 of enquiries would come from internal teams and
 9 that, for me, from my recollection, was the
 10 Retail Network Manager or the Field Intervention
 11 Officers, I think, some of them were called at
 12 a later date. So they would be the people out
 13 in the field who would have that day-to-day
 14 relationship and interaction with the branches.

15 They may come to us for -- to request
 16 Fujitsu support and, in those examples, once
 17 we'd a conclusion of the investigation, it would
 18 go back from whence it came, so back to the
 19 Retail Network Manager for consideration.

20 I think it's fair to say that, if it wasn't
 21 the answer that we'd all hoped for, in the sense
 22 that we'd found something that would explain
 23 whatever was occurring, that the retail network
 24 manager may have needed to then engage other
 25 parts of the business, again including Product

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1 take a break.

2 **SIR WYN WILLIAMS:** Let me just unmute myself to say
 3 yes.

4 **MR STEVENS:** Excellent, sir, if we could say 3.05?

5 **SIR WYN WILLIAMS:** Fine.

6 (2.55 pm)

(A short break)

7
 8 (3.05 pm)

9 **MR STEVENS:** Mr Blackburn, we've talked to about
 10 general matters, I now want to get into some of
 11 the specifics and the first one is a major
 12 incident on 9 May 2005. Please could I ask for
 13 POL00091917 to be brought up. This is the major
 14 incident report and we can see in the external
 15 distribution list, which is at the bottom, that
 16 you were included in this. Does that mean it's
 17 an incident that you would have dealt with or
 18 was it just for information only?

19 **A.** No, it's quite possible that I would have played
 20 a major incident management role during the
 21 event itself.

22 **Q.** Do you recall this incident at all?

23 **A.** I'm sorry, I don't. Unfortunately, there were
 24 quite a few, from memory.

25 **Q.** Could we turn to page 6, please. This says

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that -- the "Introduction" says that the:
 "... document details the initial incident
 that occurred within the live estate between
 09.00 and 10.00 for a four minute period on
 Monday 9th May 2005 and the activities that were
 carried out for the remainder of the business
 day by the appropriate POA Service Management
 and support teams."

If we go to page 8 now, please. Under the
 "Description of the fault", I'll read this for
 the record. It says:

"The incident that occurred presently hasn't
 a determined root cause and occurred within the
 live ate whilst the SSC word analysing the
 Correspondence Server volume capacity using the
 RiposteVolume Command. The purpose of this
 activity was to ensure that there available
 spare disk capacity across the Correspondence
 Server disk volumes.

"The work activity was carried out as
 a precautionary measure as a result of
 an archiving job not completing following
 an event storm that occurred the previous week.

"The RiposteVolume command has been used on
 numerous occasions before with no impact to

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impacted to what degree, so we may have
 understood the impact, but not been able to
 identify it was branch A, B and C, for example,
 and therefore you may have been on alert for
 waiting for a call. And that's the kind of
 thing that we referred to earlier that might
 have generated a script on the Network Business
 Support Centre, to capture that information and
 then make sure it's processed accordingly,
 ie a correction, if a correction was required,
 is applied.

But I'm sorry, I really don't remember the
 detail of this particular incident.

Q. Can we turn to paragraph 13 -- sorry, page 13.
 My apologies. Under the table, the first three
 paragraphs refer to "E Top Up Transaction
 failures", which presumably relates to mobile
 phone top-ups?

A. Yes.

Q. "... displayed in the table above occurred due
 to the interface between Fujitsu and Epay. When
 authorised transactions timeout at the counter
 a reversal is automatically generated by the
 counter. Transactions were timing out due to
 the correspondence server problems on this day.

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service, as it simply displays the details of
 Riposte Volumes.

"Running this command stops Riposte services
 running for a micro-second and then starts
 (unlocks) the services again after the volume is
 taken. It is believed that in this instance,
 due to a bug in Riposte, the services did not
 start again. A PEAK [with the number there] has
 been raised with Escher development."

Would you accept this appeared to be
 a significant problem, in that it's referring to
 a bug in the Riposte code?

A. Yes.

Q. Did this concern you at the time?

A. Yes.

Q. Is it right that, in your evidence, that these
 types of incidents would not be -- the outcomes
 of them would not be reported back to the branch
 network?

A. I certainly wouldn't have reported them back to
 the branch network. It's unlikely, I would have
 said, but I can't remember the particular event.
 There may have often been other circumstances
 where it was a necessity, because, you know, we
 couldn't perhaps establish which branches were

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Epay's systems have to match the reversal to the
 original authorisation request. The reversal
 has to get to Epay within a time limit of 10
 minutes."

Then the paragraph, skip that paragraph.
 The next one is:

"Because of the problems with the
 Correspondence server replication on this day,
 a number of these reversals did not get through
 within the time limits."

Do you think because of that, because of
 reversals not being to be made, that could have
 led to discrepancies within accounts --

A. Yes.

Q. -- and this would affect branches?

A. Yes.

Q. But if we now turn back to your witness
 statement, please, at paragraph 5, page 3 of
 your statement, in the middle, you're referring
 to a different incident but say:

"Post incident findings such as March 2005
 were not shared with the branch network to my
 knowledge ..."

A. Yes.

Q. So you said you don't have knowledge of this

172

1 being shared.

2 A. Correct.

3 Q. Is there anyone else who would have been dealing

4 with this at the time who might have shared it

5 without your knowledge?

6 A. Not directly, no. I don't have any recollection

7 of it being communicated. At least what

8 I probably alluded to just a minute ago, in

9 regards to there'd have been a number of people

10 NBSC, HSH included, who would be looking out for

11 calls. I think this is where Product and Branch

12 Accounting would have played a large role as

13 well, in regards to observing the accounts that

14 were being completed. They would have had the

15 ability to focus in on E top-up transactions as

16 an example and see whether there were

17 discrepancies that I guess, in theory, could

18 align with that event.

19 Q. If a subpostmaster had a discrepancy when they

20 came to balance, that may be because of

21 a transaction that occurred some time before?

22 A. Yes.

23 Q. So when they come to balance, some time has

24 passed, and it might be that a subpostmaster

25 simply accepts a discrepancy as an error?

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1 Q. I want to now look at what's been called the

2 Callendar Square bug. Please can we turn to

3 POL00028984 and page 10. At the bottom there's

4 an email from Sandra MacKay. Do you remember

5 who she was?

6 A. I'm sorry, no, I don't.

7 Q. The project is "Callendar Square", which was

8 a sub post office and the first line says --

9 this is to Shaun Turner, I should say, sorry:

10 "You may recall that in September the above

11 office had major problems with their Horizon

12 system relating to transfers between stock

13 units."

14 Go over the page.

15 "The SPMR has reported that he is again

16 experiencing problems with transfers ... which

17 resulted in a loss of around [£43,000] which has

18 subsequently rectified itself. I know that the

19 SPMR has reported this to Horizon Support, who

20 have come back to him stating they cannot find

21 any problem."

22 Firstly, did you have any dealings with the

23 Callendar Square branch in September?

24 A. No, my dealing with this branch was triggered by

25 Shaun Turner reaching out to me.

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1 A. As has always been problem, I think, yes, often

2 the value would be a trigger. Large values, you

3 know, would likely be reported. Low values may

4 well have just been accepted without the

5 knowledge, yes.

6 Q. What's the justification for the general policy

7 that incidents such as this wouldn't have been

8 shared with the branch network, so that the SPMs

9 could be aware of potential errors in the

10 system?

11 A. I couldn't comment on what the policy was or the

12 reasoning beyond, you know, operational role for

13 me, restore service, and the belief that there

14 were no issues that were generated with the

15 solution. Clearly, this was a major incident

16 not necessarily software related, per se. It

17 was something unintended that occurred that

18 generated a discrepancy. I'd have expected

19 Product and Branch Accounting to have cleaned up

20 this particular situation but can't say

21 categorically that was what occurred.

22 Q. So is it your evidence that the communication --

23 the responsibility for the communication lay

24 elsewhere?

25 A. It -- exactly that, yes.

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1 Q. We'll get to there in a moment. Could we go to

2 page 10, please. Just to follow the trail, we

3 have -- we had Sandra MacKay's email at the

4 bottom. We then have an email to Shaun Turner

5 from Brian Trotter. Do you remember who Brian

6 Trotter was?

7 A. I'm going to say retail network management but

8 I couldn't say specifically -- oh he's contract

9 and service manager there, isn't he? But yes,

10 I do recognise the name.

11 Q. It says:

12 "... I visited the branch with Sandra last

13 week and the SPMR provided clear documented

14 evidence that something very wrong is occurring

15 with some of the processors when carrying out

16 transfers between stock units."

17 If we go over the page to page 9, we see

18 what you just referred to as your involvement.

19 It's an email from Shaun Turner dated 6 January

20 2006. He asked for your advice on this branch.

21 Why would Shaun Turner have come to you for this

22 particular issue?

23 A. Purely the interaction and relationship with

24 Fujitsu, so we were an escalation team. We

25 weren't outwardly facing to branches. We were

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1 a level 2, if you like. And the Retail Network
2 Management, all of them had the opportunity to
3 raise escalations with us for us to engage
4 Fujitsu and get them to investigate a particular
5 occurrence. And that's what happened on this
6 occasion.

7 **Q.** Indeed, at the bottom, he describes a problem
8 and his last sentence is:
9 "I am concerned that there is a fundamental
10 flaw with the branches configuration, and would
11 be interested to know how Fujitsu Services put
12 the first issue to bed."

13 At this point in time, did you think this
14 was an issue that was affecting a single branch
15 or a wider issue?

16 **A.** Single.

17 **Q.** If we go up the page, I think it's to the next
18 page, we'll see you email Liz Evans-Jones. Do
19 you remember who she was?

20 **A.** Yeah, she was a higher level than me. In
21 effect, she was my line manager's opposite. So
22 I went straight to an escalated level within
23 Fujitsu rather than go to the people I would
24 ordinarily engage with.

25 **Q.** Why did you decide to escalate it?

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1 **A.** A new software release that the business was
2 working on. It would have contained many
3 things. I am assuming there are lots of
4 business related reasons for a new software
5 release but it would also have contained
6 a backlog of fixes for any bugs or defects that
7 had been found. I couldn't say on over what
8 time frame but, for me, I do remember S90 being
9 very important. I do seem to remember a lot of
10 communication about its need being rolled out to
11 the branch network.

12 **Q.** At page 7, if we could go up, we see that you
13 pass this on to Shaun Turner and then Shaun
14 Turner goes on to reply to you.

15 **A.** Yes.

16 **Q.** If we carry on up. Thank you. This is
17 17 February now. The first question -- Shaun
18 Turner asks three questions, the first of which
19 says:

20 "Do we understand why this particular branch
21 has been having problems? Or are there other
22 branches in the network that have been having
23 this problem?"

24 Now at this stage, had your view changed on
25 from it being a single branch issue to having

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1 **A.** Shaun was somebody I'd got the greatest respect
2 for and trust for, I'd known him a very long
3 time. His email was casting enough concern for
4 me to do this on this occasion.

5 **Q.** The £43,000 discrepancy, that's a large
6 discrepancy?

7 **A.** Yes, I mean obviously it is ridiculously large.
8 Having said that, numbers are everywhere in the
9 Post Office, and so it isn't necessarily
10 a trigger. It was really the fact that Sean was
11 coming to me. Number 1, he was escalating to me
12 which meant it was important and, number 2, it
13 just looked like something on the basis of his
14 knowledge, his experience, that he was saying
15 the system not working as it was intended. So
16 I went straight to an escalated level on that
17 occasion.

18 **Q.** Liz Evans-Jones's response is immediately above
19 this.

20 **A.** Yeah.

21 **Q.** She says:

22 "I have checked the call and this issue is
23 schedule to be resolved in S90."

24 What was your understanding of S90 at that
25 point?

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1 concerns with it being a wider issue or not?

2 **A.** It wasn't actually, no. So whilst I'd taken
3 from Liz Melrose-Jones (*sic*) response that
4 clearly Fujitsu were aware of it and/or a risk
5 of it, this was my first experience of it
6 actually occurring within the network. So at
7 this point in time, clearly I was aware now that
8 there was a risk of others being impacted that
9 this was the only branch specifically that I was
10 aware of.

11 **Q.** If we look at page 3 on this email chain we see
12 on 23 February 2006, there's an email from Anne
13 Chambers to Mike Stewart, which you were
14 subsequently sent this email.

15 **A.** Yes.

16 **Q.** You would have read it at the time?

17 **A.** Yes.

18 **Q.** The second paragraph says:

19 "Haven't looked at the recent evidence, but
20 I know that in the past this site had hit this
21 Riposte lock problem 2 or 3 times within a few
22 weeks. This problem has been around for years
23 and affects a number of sites most weeks, and
24 finally Escher say they have done something
25 about it."

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1 What did this mean to you when you read it?

2 **A.** News. It's not something -- you know, I do

3 actually -- when I've looked at all the evidence

4 you've provided, whilst I couldn't remember the

5 detail until I went back through the evidence,

6 Callendar Square was a name and a Post Office

7 that I remembered immediately because this was

8 long running from my involvement, but that, to

9 me, that statement was, I believe at the time,

10 news to me. Not something I was aware of that

11 branches could have this issue from Smart post

12 transactional problems.

13 **Q.** Would this problem concern transfers from the

14 stock units, Callendar Square?

15 **A.** I'd understood it was -- yes, but I thought I'd

16 understood it was triggered by a particular

17 transaction. I may be incorrect on that.

18 **Q.** But in terms of the problem itself, the fact

19 that it's saying it's been around for years and

20 it affects a number of sites was weeks, did you

21 believe that was significant?

22 **A.** It's shocking. Yes, shocking. If -- especially

23 on the basis of, as you could see from Liz's

24 response, that if there was an awareness of it,

25 there wasn't enough awareness of it, and it had

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1 by the held lock, and advise them to reboot the

2 affect counter before continuing with the

3 balance. Unfortunately in practice it seems to

4 take SMC several hours to notice these storms,

5 by which time the damage may have been done."

6 Do you know what this refers to when it's

7 talking about "event storms" or what was your

8 understanding at the time?

9 **A.** At the time, that would have been -- as I've

10 just said, my first reading of it, it would be

11 a question for Fujitsu, I'm afraid, as to what

12 an "event storm" actually is or contains. But

13 it clearly shows that Fujitsu were aware of it,

14 they'd created a Known Error Log and were

15 managing the calls, at least reactively, but

16 I don't equally remember any proactive

17 communication on the -- from when this was

18 originally identified.

19 **Q.** Did you discuss this issue with anyone within

20 Post Office once it came to your attention?

21 **A.** No, but I think not long after this particular

22 email, I think more evidence became available to

23 me, I think three or four, maybe five post

24 offices having the same problem, for the same

25 reasons. At that point, I'd made sure that it

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1 been parked, obviously, for quite a while in the

2 backlog, if we were only going to look to fix it

3 in the S90 software release.

4 **Q.** Did you have any concerns at the fact that,

5 where we went the first email we went to,

6 Callendar Square branch were initially told that

7 there was no problem in the system?

8 **A.** I wouldn't say concerned until you get, you

9 know, you get the rest of the detail and then

10 you understand and then you can reflect back and

11 go, yes, you would be concerned. I think it

12 points to my earlier point around having to

13 trust, you know, the expertise in terms of the

14 advice and guidance that had been given.

15 But, again, I'll also say this was my first

16 awareness of this particular problem and this

17 particular branch experiencing this problem.

18 What had gone before, I couldn't say whether

19 that was just calls logged into the Horizon

20 Service Desk and how those had been resolved and

21 managed.

22 **Q.** The last paragraph of this email says:

23 "Please note that KELs tell SMC that they

24 must contact sites and warn them of balancing

25 problems if they notice the event storms caused

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1 was escalated into our problem management

2 function to get greater visibility and

3 awareness. Prior to that additional set of

4 branches, though, I'll be honest and say that

5 I'd accepted Liz's position, in that S90 was the

6 fix.

7 **Q.** In any of the conversations you'd had with

8 anyone in Post Office about this, were you aware

9 of anyone in Post Office who was aware of this

10 problem before --

11 **A.** No. Personally, no. I find it had to sit here

12 and believe that no one did know but personally,

13 no, I didn't know.

14 **Q.** What steps were taken in respect of

15 communicating this issue or this bug to teams

16 outside of Problem Management?

17 **A.** I can't say, I'm afraid, what I can say is

18 I didn't communicate it further than Problem

19 Management. What happened to it beyond then,

20 I'm sorry, I couldn't say, I can't remember.

21 **Q.** Do you know who was responsible for

22 communicating that outside of Problem

23 Management.

24 **A.** Someone somewhere in the business at

25 a reasonable level would have had to have made

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1 a decision as to whether it was communicated in
2 its entirety and a warning provided to branches
3 aligned with that Fujitsu knowledge article, for
4 example, which seems to be sat, as I'm saying,
5 reactively waiting for a storm to occur and then
6 a response. I'm not sure, though, that a branch
7 would have had the ability to have noticed or
8 known what a storm was, or looked like or felt
9 like, so that, you know, may have been the most
10 appropriate response.

11 **Q.** So you say you pass it on to the knowledge --
12 the Problem Management Team.

13 **A.** Mm-hm.

14 **Q.** Are you aware of this issue being known about by
15 other members of the Post Office outside of that
16 Problem Management Team?

17 **A.** No, as I say, it was news to me so --

18 **Q.** Sorry, after you'd discovered it?

19 **A.** After I'd discovered it, no, I don't know
20 whether -- I can't remember what or who they
21 communicated with post raising of the problem
22 record but I would suspect, given that clearly
23 there was already awareness of it within
24 Fujitsu, and the fix cued to go out within S90,
25 that the process that's described in there just

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1 **Q.** I want to move on to a different issue. Please
2 can we open FUJ00121072. This is an email to
3 you from Gareth Jenkins. Did you work with
4 Gareth Jenkins often?

5 **A.** No. Gareth was sort of development level from
6 what I remember, deeply technical. It was
7 a rarity for Gareth to reach out to me,
8 particularly if he's copied in Mike Stewart,
9 which would be much more likely my point of
10 contact, occasionally Anne.

11 **Q.** So the date is in the American form but it is
12 sent on 13 February 2007 --

13 **A.** Yeah.

14 **Q.** -- and it attaches a document called "Rem
15 Misbalance". If we could look at that now it's
16 FUJ00121073. Do you recall receiving this
17 document at the time?

18 **A.** I don't recall, no. Sorry.

19 **Q.** It describes:

20 "... a serious bug introduced into Live that
21 can result in accounts misbalancing.

22 "This bug was introduced as part of
23 LFS_COUNTER 35_6 which went to a limited number
24 of branches for a pilot from 4/2/07 to 11/2/07
25 and then to the whole estate on 12/02/07."

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1 continued up to rollout of S90.

2 **Q.** Do you think that subpostmasters should have
3 been made aware of this issue?

4 **A.** Ideally, yes. As I say, I think the trigger is
5 worrying me somewhat because I don't have
6 an understanding of what "event storm" means or
7 whether it would be obvious to somebody at the
8 branch counter end but, ideally, I think, you
9 know, as a basic principle, all branches should
10 have been aware of any particular defects or
11 issues that could have affected accounting.

12 **Q.** Were you involved with the handling the problem
13 after initially discovering it?

14 **A.** I don't think I was, actually, no.

15 **Q.** Did it influence the way you thought about the
16 Horizon IT System thereafter?

17 **A.** I think not only this but, at that time, others
18 were now already more prevalent, probably for
19 any number of reasons, just, you know,
20 knowledge, understanding, the way that people
21 were then more confident in reporting and
22 reported them through the procedures. There was
23 certainly an upward trend in regards to any
24 number of instances where people believed
25 Horizon may have caused the discrepancy.

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1 It goes on to describe the history of the
2 issue. If you could go down, please, to "Basic
3 Problem Effects". It says:

4 "The basic problem is when Rem Outs ..."

5 Can you help us with what rem outs are?

6 **A.** Sending out remittances, probably of cash rather
7 than stock, back to cash centres or back to the
8 Swindon Stock Centre.

9 **Q.** So it says --

10 **A.** Surplus.

11 **Q.** Oh, sorry?

12 **A.** Sorry, surplus.

13 **Q.** "... incorrect transactions are recorded.
14 Specifically some of the Rem transactions are
15 missing.

16 "Take an example of 2 £500 coin bags being
17 Remitted out, then the following was recorded
18 ..."

19 Then if we look at that table, effectively
20 it's showing the cash out on the top line, the
21 rem out cash is 500 when it should be 1,000.

22 **A.** Yeah.

23 **Q.** It says below:

24 "The Stock Unit will show a £500 excess cash
25 and a Receipts and Payments mismatch."

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1 If we can go over the page please:
 2 "Some branches have made a further Rem of
 3 £500 in an attempt to correct the situation. If
 4 this Pouch is subsequently Despatched, then this
 5 should result in the branch accounts being
 6 correct.
 7 "Note that this will result in further
 8 incorrect data being sent to [Post Office
 9 Limited] FS see discussion in section 3.2.
 10 "However, if this Pouch is **not** Despatched,
 11 then the Stock Unit will balance and report
 12 correctly but the £500 will remain Stuck in
 13 Suspense."
 14 It goes on to say:
 15 "It is recommended that all Branches are
 16 advised to do such a Dummy Rem and to Despatch
 17 the pouch to ensure that the Branch Accounts are
 18 clear."
 19 Can you just in broad terms explain what
 20 that advice is, the dummy rem?
 21 **A.** Creation of a false rem, a remittance amount, to
 22 trigger the balance accounting being accurate,
 23 but it's something that it doesn't exist in
 24 terms of, I think, the example £500.
 25 **Q.** So, in effect, redo the transaction --
 189

1 It says:
 2 "As the obverse of the coin of remming in,
 3 SPMs rem out pouches of cash to be returned to
 4 the Post Office Cash Centre. A single pouch may
 5 contain multiple bags of coins or cash and each
 6 bag can only hold one denomination, and there is
 7 a limit as to how much cash can be placed into
 8 a pouch. The cash can be remmed out before it
 9 is physically collected. When remmed out, the
 10 cash appears in a different line in the branch
 11 accounts. On collection, the collection team
 12 scan a barcode on the pouch and the cash is
 13 removed from the 'cash in pouches' line of
 14 accounts."
 15 It says:
 16 "When remming out, branches should have made
 17 one entry for each denomination and value and,
 18 if there were multiple bags for a particular
 19 denomination, the quantity of bags should have
 20 been specified in that single entry ..."
 21 So two times £500 of £2 coins.
 22 "However, if the SPMs had made multiple
 23 entries for each denomination and value (eg one
 24 entry for 1 x £500 bag of £2 coins and a second
 25 entry for 1 x £500 bag of £2 coins), Horizon
 191

1 **A.** Yes.
 2 **Q.** -- without sending the cash so that it balances?
 3 **A.** Correct.
 4 **Q.** It says:
 5 "It has been agreed that POA SSC will
 6 contact each branch with detailed advice as
 7 exactly what to do."
 8 Please can we now go to the technical
 9 appendix of the Horizon Issues judgment. It's
 10 POL00022841, page 52. This is the judgment of
 11 Mr Justice Fraser in the Group Litigation Order
 12 where the judge was looking at bugs, errors and
 13 defects in the Horizon IT System from which this
 14 Inquiry is building on the findings.
 15 **A.** Okay.
 16 **Q.** Section 6 refers to a remming out bug. If we
 17 could go over the page to 201, please, it says:
 18 "Issue 6(i) arises as follows. What is
 19 called 'a remming error' leads to a mismatch
 20 between the amounts of cash remmed out to one
 21 place and the amounts remmed in from another.
 22 The Post Office has submitted that remming
 23 errors are a clear violation of Data Entry
 24 Accounting and are picked up by Horizon. The
 25 two different issues are as follows."
 190

1 would only record the first bag as having left
 2 the branch's cash holdings, but all of the bags
 3 would show on the 'cash in pouches' line. This
 4 would have created a discrepancy in the branch
 5 accounts because all of the cash would have been
 6 collected."
 7 Is this the bug that you were dealing with,
 8 with Gareth Jenkins in February.
 9 **A.** I can't be absolutely certain but it's certainly
 10 reads and appears to be, yes.
 11 **Q.** So, in essence, the problem in lay terms is two
 12 pouches, say, of £500 are sent to the cash
 13 centre but Horizon only logs that one has been
 14 sent?
 15 **A.** Yes.
 16 **Q.** So Horizon records that there is an additional
 17 £500, which isn't actually there?
 18 **A.** Correct.
 19 **Q.** Can we please go to FUJ00120587. This is
 20 a Known Error Log, "KEL_acha508S" and you see
 21 it's created on 12 February 2007 or raised then,
 22 so at the time this was made this issue was
 23 being dealt with, and last updated on
 24 15 February 2007. We see from the "Symptoms"
 25 that we are referring here to this bug.
 192

1 A. Yes.

2 Q. Please can we go down to the bottom section. It

3 says:

4 "Calls about inconsistencies in stock rem

5 outs should be redirected to NBSC. SSC have

6 contacted all branches who have had a problem

7 with cash rem outs, quoting ref PC143435."

8 Is it the position then at this stage, on

9 15 February, the SSC had called the branches or

10 contacted the branches where there was

11 a discrepancy arising from this bug and sought

12 to deal with it.

13 A. That's how I'm reading that, yes, that they've

14 called the ones that have been identified.

15 Q. Please can we turn now to FUJ00121071 and turn

16 to page 3 at the very bottom. We see your name

17 at the bottom.

18 A. Yes.

19 Q. An email on 15 February. If we can go over the

20 page to see the content of that email. The

21 subject is "T30 Release -- Impact on Stock

22 Rems -- Monday 12th February". You say:

23 "Scenario:

24 "Whilst the T30 release was out in the

25 branch network, Monday 12th Feb only for all bar

193

1 unknown if there's a discrepancy?

2 A. Yes.

3 Q. In terms of "Next Steps" you say:

4 "Identify which of those branches have

5 a discrepancy between Horizon and the rem

6 slip -- Options here are to contact the branches

7 or wait and react to calls made into NBSC,

8 HSD -- I will then arrange a conference call to

9 discuss way forward tomorrow ..."

10 So is it fair to say that these 570 branches

11 are different to the branches the SSC had

12 already contacted in the KEL we'd referred to?

13 A. I can't actually remember but that's the way

14 I am reading this yes, that they're additional.

15 Q. In respect of these branches, there's

16 essentially two options, is it fair: one is

17 a proactive approach of contacting those

18 branches to advise them of the issue --

19 A. Yes.

20 Q. -- and the second is to wait for calls to come

21 into the NBSC; do you accept that?

22 A. Yes.

23 Q. Thank you. Now, at this stage, the

24 subpostmasters again would have no idea that

25 there was a bug in the system, would they?

195

1 120 branches that were incommunicado during the

2 initial regression progress. We have

3 a potential situation where a branch completing

4 the stock rem out [so that's the cash going out

5 to the cash centre] on that day could have

6 a discrepancy due to the fact that not all stock

7 physically returned by the branch may have been

8 deducted from Horizon from the stock on hand

9 table, this despite the fact that the rem slip

10 produced matched the physical stock returned."

11 You then say under "Latest position":

12 "We have a possible 570 branches that were

13 affected by last weekend's T30 release, now

14 regressed.

15 "The pouch IDs have been identified by

16 Fujitsu.

17 "The branches who sent those pouches have

18 also been identified, and the value of the stock

19 returned from each has been established from the

20 POC file."

21 Do you know what the POC file is?

22 A. I'm sorry, I don't remember.

23 Q. "We still don't know which of these branches has

24 actually got a discrepancy due to the problem."

25 So these are potentially affected branches,

194

1 A. Correct.

2 Q. A subpostmaster would only be aware of the issue

3 in balancing when they came to balance the stock

4 unit?

5 A. Correct.

6 Q. Again, this could be some time after remming

7 out?

8 A. It could.

9 Q. So, again, it's another example of when

10 a subpostmaster may have thought that

11 discrepancy on balancing was caused by

12 a mistake?

13 A. Yes.

14 Q. They had no reason to believe, if they're not

15 told, that it was due to a bug, error or defect

16 in the Horizon IT System?

17 A. That's also correct.

18 Q. Please can we go to page 3. It's quite

19 confusing the way this email is set out, but you

20 see halfway down there's an email from Dave

21 Hulbert, 5 February 2007 --

22 A. Yeah.

23 Q. -- forwarding on your email to Andy McLean.

24 Just starting out with some identities, who was

25 Dave Hulbert?

196

1 A. My line manager at the time.
 2 Q. And Andy McLean?
 3 A. His line manager.
 4 Q. It says:
 5 "Andy
 6 "See update below.
 7 "Not much progress today. The dilemma for
 8 Gary is approaching branches is proactive but
 9 opens the risk of litigation in future ie we're
 10 telling 570 branches that Horizon may have
 11 caused a discrepancy -- low risk but a risk --
 12 being reactive doesn't feel right as we've
 13 caused the problem for branches but this may be
 14 the right option in this situation."
 15 To what extent was the risk of litigation
 16 taken into account at the Post Office at this
 17 time when deciding how to handle a known bug,
 18 error or defect?
 19 A. It's possibly more of a question for David and
 20 Andy. My reason for escalating this, obviously
 21 beyond the seriousness of the situation, is just
 22 a growing awareness of the volume of defect or
 23 bug related calls and enquiries that we were
 24 undertaking. But also very aware that the
 25 mantra and message was still "There are no
 197

1 uncomfortable. It's uncomfortable reading today
 2 and it was uncomfortable reading then.
 3 Q. Was this reflective of a broader culture in the
 4 Post Office at the time, that Horizon shouldn't
 5 have been challenged?
 6 A. I don't want to repeat going back to the
 7 messages but, absolutely, on the basis that
 8 there was no accepted agreement, that there was
 9 Horizon integrity issues, that was the general
 10 culture and that is what drove the behaviour.
 11 Q. Please can we turn to page 2 of this email. At
 12 the bottom you email -- I think it looks like
 13 you email Dave Hulbert and Andy McLean?
 14 A. Yes.
 15 Q. You say:
 16 "Bad news.
 17 "On further investigation today we have
 18 established that the POC file actually matches
 19 POL-FS."
 20 What does that mean?
 21 A. It meant that we still didn't and couldn't
 22 identify the values or the branches involved in
 23 this particular issue.
 24 Q. It says:
 25 "This means that we still don't know what
 199

1 Horizon integrity issues and there are no
 2 systemic issues that cause problems", and yet
 3 here's clearly an example, whether driven by
 4 human error or not, that was creating
 5 discrepancies in branch.
 6 Q. But in this case -- it's right to say in this
 7 case there was a known error --
 8 A. There was, in this instance a known error, yes.
 9 Q. -- that caused discrepancies --
 10 A. Yes.
 11 Q. -- and your line manager is suggesting here of
 12 not taking a proactive approach, and one of the
 13 reasons given is the risk of litigation?
 14 A. Yes.
 15 Q. The risk of that litigation presumably is that
 16 someone will turn round and say, "Horizon is
 17 causing discrepancies" --
 18 A. Absolutely.
 19 Q. -- which, in fact, it was in this case?
 20 A. It was.
 21 Q. What did you think to this email when you saw
 22 it?
 23 A. It's different because now I'm in a position
 24 many years later where I'm reflecting on it, of
 25 course with the benefit of hindsight. But it's
 198

1 value stock has been returned by these 570
 2 branches. Furthermore the only way we could
 3 find out would be for someone at Swindon to find
 4 the specific pouches and physically open each
 5 one and count the stock.
 6 "This rules out a proactive recovery plan."
 7 Do you still agree with that?
 8 A. Roll it out in the sense that what would we have
 9 told the branch? We could have told them there
 10 was a problem but nothing more. Couldn't give
 11 them any indication of -- to the extent of
 12 impact that it had had on them. But, actually,
 13 with hindsight, there would have been
 14 an opportunity to, I think, have -- well, I can
 15 see that throughout the email chain that Product
 16 and Branch Accounting have been included within
 17 this because they would have been seeing as
 18 well, the outcome and the impact of this.
 19 There was clearly an opportunity to have
 20 reached out to the 570 branches, even in the
 21 absence of detail and values, and inform them so
 22 that they were aware so that we could have done
 23 something more collaborative with them to
 24 resolve the issue.
 25 Q. You go on to say that:
 200

1 "I have ensured that both NBSC and HSD have
2 scripts to deal with any queries relating to
3 stock from these branches."

4 So that's if someone rings in.

5 **A.** That's that reactive process again and that
6 script again, to make sure that they catch it
7 and the branch is recompensed and the correction
8 made.

9 **Q.** The Inquiry hasn't seen or had sight of that
10 script. Do you know where those scripts would
11 usually be held or stored? Was it on the Remedy
12 system as well?

13 **A.** Given the temporary nature, I'm not sure whether
14 they were uploaded digitally or not, actually.
15 But if they were anywhere, it would be Network
16 Business Support Centre environment.

17 **Q.** If we can move on to another issue, please, and
18 that's a PEAK that you refer to in your witness
19 statement. It's POL00001313. Before the
20 Inquiry sent you a document like this, had you
21 seen one of these before, a PEAK?

22 **A.** Yes, occasionally. I can't remember what the
23 PEAK acronym sort of means but I think it
24 relates to Fujitsu's internal tool or system for
25 recording bugs and defects that needed to be

201

1 **A.** Not an expert, I'm afraid, on the issues
2 management process but I think that this would
3 have been communicated to Product and Branch
4 Accounting. It's not something that they'd have
5 been looking for support from incident
6 management with and I'm afraid I have no
7 recollection at all what the acronym "EDSC"
8 means.

9 **Q.** We'll leave that there then and move on to
10 another matter. POL00023765, please. This is
11 a PEAK PC0152014, branch 183227. It refers to
12 an incomplete summaries report. Can we go to
13 the bottom of page 1, please. We see an entry
14 on 10 December, right at the bottom.

15 **A.** Yes.

16 **Q.** If we could go over the page, it says:

17 "This is due to a single SC line written for
18 \$1,000 (£484) with no settlement in the middle
19 of two RISP transactions."

20 It says:

21 "On call PC0151718 the harvester exception
22 was corrected and now the transaction for the
23 day don't zero, hence this issue with the
24 incomplete summaries [form]."

25 It goes on to requesting the message form.

203

1 queued in a backlog then for fix. If there was
2 any reason for somebody like Anne Chambers --
3 I think it is Anne in this instance, isn't it --
4 to make me aware of that, I suspect it was
5 probably attached to the email explaining to me,
6 hopefully in simple terms, why I was being
7 informed.

8 **Q.** This says, issue at Branch 106129, which has
9 a non-zero trading position. The entry on
10 18 February at 1500 hours, just go down
11 slightly:

12 "Branch 10629 appears to have been affected
13 by a known software problem ... which causes
14 a non-zero trading position, a receipts and
15 payments mismatch and an incorrect discrepancy."

16 Further down on 25 February, we see that you
17 were notified of this problem. Do you have any
18 independent recollection of that?

19 **A.** I'm afraid not, no.

20 **Q.** Over the page, again on 25 February, it says:

21 "Thanks, Anne. Final BIMS issued to POL
22 including 'Information for BIMS' text.
23 Returning call to EDSC for closure."

24 Can you assist with what that means in terms
25 of the "final BIMS issue to POL"?

202

1 Do you understand broadly what this problem was?

2 **A.** I don't. It's too technical for me but,
3 fundamentally, it's describing another software
4 related, application related issue that's
5 created a discrepancy in the branch.

6 **Q.** It refers to OCP17510, which has been raised.
7 Do you remember what an OCP was?

8 **A.** Operational Change Process or Procedure or
9 something like that, I think. It was the audit
10 trail that was created to match with whatever
11 action was being taken, so that that 17510
12 should match whatever correction activities, so
13 whether that's message store or otherwise, was
14 done to make this right.

15 **Q.** So when you say "message store", do you mean
16 where Fujitsu were making changes --

17 **A.** The way Fujitsu went into the system to correct
18 the issue.

19 **Q.** The OCP was the --

20 **A.** And the OCP was the audit trail for that
21 activity, yeah.

22 **Q.** Do you recall, from your recollection, what were
23 the controls, the security controls, on the use
24 of OCP?

25 **A.** I don't. I mean, I would have seen plenty in my

204

1 time for both awareness and, on occasions,
 2 approval but I don't really remember, I'm
 3 afraid, the process, quite how we raised them,
 4 how they were triggered. I think we just had
 5 an approval or sight of within my team.
 6 **Q.** Can we look at the OCP. It's FUJ00087194. So
 7 we see "Write corrective bureau message" for the
 8 branch. It says:
 9 "A single SC message ... was written in
 10 error on 26th November ... selling 1,000 US
 11 dollars, with no corresponding settlement line.
 12 To remove the effects of this message at both
 13 the branch and on POL-FS, we will insert a new
 14 message to negate the effects of the original
 15 message."
 16 So is your understanding of this that what
 17 Fujitsu would do is insert, essentially,
 18 a transaction into the branch accounts?
 19 **A.** To balance the books, yes, and an accepted
 20 process as well. I know this is just one
 21 example but that would be what I'd expect to
 22 happen in these circumstances.
 23 **Q.** When were you first aware of Fujitsu's ability
 24 to --
 25 **A.** Oh.

205

1 sorry, not that far. Sorry, just a little
 2 further up. Thank you. We refer to extra
 3 detail and it gives the original message and the
 4 new message attributes. Do those -- I mean,
 5 from your position, you say you're
 6 non-technical, do those words mean anything to
 7 you, insofar as could you challenge them or
 8 check they're accurate?
 9 **A.** No. You know, it's -- I would always work, my
 10 team would always work, based upon the business
 11 outcome element of the -- any given situation.
 12 So for me, really simply, this is about
 13 rectifying correctly for a branch a situation
 14 which is not of their making.
 15 **Q.** So it says at the bottom there:
 16 "Gary Blackburn (POL) is already aware of
 17 this issue."
 18 **A.** Yes.
 19 **Q.** If we go down, there's an email, which you
 20 aren't in copy for, but it says:
 21 "Hi Gaby,
 22 "POL approve this change.
 23 "As soon as I saw the branch name,
 24 I realised that this is the one that Gary spoke
 25 to Anne Chambers about earlier."

207

1 **Q.** -- insert transactions like this?
 2 **A.** I don't know but I'm -- I'm going to say
 3 probably HNG-X rather than Legacy Horizon, so
 4 much later on.
 5 **Q.** Well, we're here in 2007.
 6 **A.** Oh, right, okay.
 7 **Q.** Horizon Online is 2010 onwards.
 8 **A.** Yes, so -- but I still -- I'm afraid I don't
 9 know. It's not something that you were
 10 particularly conscious of at the time or that it
 11 maybe particularly concerned you or felt wrong
 12 in any kind of way, if I can -- I can't find
 13 a way to articulate it. It felt part of a BAU
 14 process from an internal operational
 15 perspective.
 16 **Q.** Were you aware of any ability of Fujitsu to
 17 insert, edit or delete transactions from the
 18 branch accounts outside of the OCP procedure?
 19 **A.** Oh, no. I'd have always expected there to have
 20 been communication with Post Office and, if it
 21 was making a correction, OCP was -- I was going
 22 to say the only -- there may have been another
 23 but that was a process for audit trailing
 24 amendments that were being made.
 25 **Q.** If we can go down to the bottom of this OCP,

206

1 **A.** Yes.
 2 **Q.** So, at this time, you were relying on Fujitsu to
 3 implement the change and no one at Post Office
 4 was checking it from a technical perspective?
 5 **A.** Not from my perspective and, as I've said, I and
 6 my team, of which Julie Edgley was one at the
 7 time, would not have had that ability, so it's
 8 going on the advice, the guidance given.
 9 **Q.** Would you have told or arranged for the
 10 subpostmaster to be told of this change?
 11 **A.** I don't remember doing so. I really would like
 12 to sit here today and be able to say to you that
 13 we did, it is possible that we did. We spoke
 14 to -- and I, through all my years, spoke to many
 15 subpostmasters but I really cannot say that
 16 I did on this occasion.
 17 **Q.** In general terms, when you had these types of
 18 transactions, would you --
 19 **A.** In general terms, yes. Naturally, we would want
 20 to ensure that the postmaster was aware because
 21 there was an issue of awareness and timing of,
 22 because it would become apparent to them because
 23 an entry was being made. I think there might be
 24 a different example within the pack where we
 25 have actually recorded an email that we've spoke

208

1 to a particular postmaster but I can't remember
 2 this particular example.
 3 **Q.** If we could go back to the PEAK we looked at
 4 before, it's POL00023765, and to page 3.
 5 14 December, the entry at 15.37 says:
 6 "Email to Gary Blackburn."
 7 The Inquiry doesn't have or hasn't had sight
 8 of that email but the following entry says this:
 9 "The counter problem which caused the first
 10 issue has been corrected by inserting a message
 11 into the message store, for equal but opposite
 12 values/quantities, as agreed with POL (OCP
 13 17510)."
 14 Which was the document we just went to.
 15 **A.** Yes.
 16 **Q.** "As a result of this corrective action, the net
 17 effect on POL-FS is zero, and the POL-FS figures
 18 are in line with the branch. POL-MIS received
 19 both the original message and the corrective
 20 message.
 21 "Once the problem was corrected, there
 22 should have been no impact on the branch.
 23 However it has been noted that the stock unit
 24 BDC had a loss of \$1,000, which was generated
 25 after the correction was made. We have already
 209

1 Office interpreted its contract with
 2 subpostmasters at the time, that a discrepancy
 3 for which there wasn't a system explanation, the
 4 subpostmaster would have been expected to make
 5 good that discrepancy?
 6 **A.** That would be my understanding, yes.
 7 **Q.** So as a matter of basic fairness, do you accept
 8 they should have been told about, the fact that
 9 a transaction -- I won't use that term, sorry --
 10 the fact that remote access had been used to
 11 insert a transaction?
 12 **A.** Yes.
 13 **Q.** But, again, there's no record, in this PEAK, of
 14 the subpostmaster being told?
 15 **A.** And I can't remember, I'm afraid, whether it was
 16 or it wasn't.
 17 **Q.** Before moving on, can we turn to page 12,
 18 please, of your witness statement, paragraph 23.
 19 You deal here with remote access and you refer
 20 to the OCP procedure. You say:
 21 "I also knew that they ['they' being
 22 Fujitsu] could see what had happened in branch
 23 down to the detailed sequence of individual
 24 keystrokes."
 25 So is it your evidence that Fujitsu held
 211

1 notified Gary Blackburn at POL (email attached).
 2 This appears to be a genuine loss at the branch,
 3 not a consequence of the problem or correction."
 4 Do you recall being made aware of this?
 5 **A.** I don't. But clearly I was.
 6 **Q.** Is it a fair summary to say what Anne Chambers
 7 is effectively saying here is there was
 8 initially a problem which caused a \$1,000
 9 discrepancy?
 10 **A.** Yeah.
 11 **Q.** They inserted a transaction to try to correct
 12 that, so a \$1,000 transaction the other way, and
 13 now there was a \$1,000 loss to the branch, which
 14 they were saying was unrelated to the use of the
 15 remote access. Does that strike you as odd?
 16 **A.** Yes.
 17 **Q.** There's no record in this PEAK of this being
 18 challenged at the time. Do you think you would
 19 have challenged it?
 20 **A.** I'd like to think so but, again, you know,
 21 passage of time, I honestly -- it isn't
 22 something that I remember, but, you know,
 23 clearly \$1,000 is a trigger there to say too
 24 much of a coincidence.
 25 **Q.** It's correct, isn't it, that under the way Post
 210

1 audit data that showed what keystrokes had been
 2 held in branch?
 3 **A.** Yes, that was my understanding yes.
 4 **Q.** How often did you request such data or see such
 5 data?
 6 **A.** Possibly once or twice with post offices that
 7 were in this kind of scenario. I'm not saying
 8 the same particular trigger that were disputing
 9 discrepancies. I do remember it was actually
 10 through the BIM process, through Nick Crow, that
 11 it had been requested to try to prove or
 12 disprove a sequence of events that might have
 13 explained whether it was system driven or user
 14 driven.
 15 **Q.** So you say you use it two to three --
 16 **A.** I think a couple of occasions, only a couple of
 17 occasions where there was really quite difficult
 18 protracted enquiries and investigations. I'm
 19 sorry, I can't remember the names of the post
 20 offices. I remember one was in Exeter is all
 21 can say.
 22 **Q.** Was it difficult to obtain that information?
 23 **A.** Yes.
 24 **Q.** Why?
 25 **A.** It wasn't -- it's something I had to -- you
 212

1 know, you'd have to ask for, and it may have
 2 been on occasions that, you know, it wasn't
 3 available for whatever reason, it's a question
 4 for Fujitsu to understand how they audited and
 5 retained and held that information. But, no, it
 6 wasn't something that I could just freely
 7 obtain.

8 **Q.** Did you have to get internal approval to seek
 9 such information?

10 **A.** I don't remember doing so, I remember it just
 11 feeling that if it was the right one -- one of
 12 the right questions to ask in a circumstance
 13 that we would ask.

14 **Q.** Were you aware of any costs implications of
 15 obtaining such data?

16 **A.** I wasn't no.

17 **Q.** Are you aware of any whistleblowing policies in
 18 Post Office at the time, relating to issues such
 19 as remote access or bugs, errors and defects?

20 **A.** No, I'm sorry.

21 **MR STEVENS:** Sir, I'm just looking at the time.
 22 I've still got a few topics to cover and there
 23 are questions from Core Participants as well.
 24 I understand Mr Blackburn is available tomorrow
 25 to give evidence.

213

1 **MR STEVENS:** Thank you, sir.

2 **(4.11 pm)**

3 **(A short break)**

4 **(4.15 pm)**

5 **MR STEVENS:** Sir, can you see and hear me?

6 **SIR WYN WILLIAMS:** I can.

7 **MR STEVENS:** Good thank you. I'll carry on.
 8 Mr Blackburn, before moving on to the next
 9 topical I failed to put something to you
 10 earlier, which I should do now, so apologies for
 11 treading over ground we've covered. Can we go
 12 back to FUJ00121071. This was about the remming
 13 out bug we discussed earlier. At page 3, we
 14 discussed about the ruling out of proactive
 15 recovery plan and also a -- so relying on
 16 a reactive one. I feel I should put it to you
 17 squarely, from this, is it fair to say that
 18 a reactive recovery plan was, in fact, followed
 19 in this case?

20 **A.** Yes.

21 **Q.** Thank you. If we could move, then, to cover
 22 a dispute arising from the Hogsthorpe Post
 23 Office, and that is, if we could turn to
 24 POL00021163, please, and page 4. Thank you. So
 25 at the bottom, please, we see that this refers

215

1 **A.** I have come prepared, yes.

2 **MR STEVENS:** I'm happy to carry on but --

3 **SIR WYN WILLIAMS:** Are you saying collectively that
 4 we would go substantially beyond 4.30 if we
 5 tried to finish him today?

6 **MR STEVENS:** I'll just check. How long do people
 7 think they'll be with questions?

8 **MR JACOBS:** Sir, as matters stand, I don't have
 9 anything at the moment.

10 **MS PAGE:** I've only got short questions.

11 **MR STEVENS:** In which case, I'd understood there
 12 would be many more questions and so I think
 13 I can fit it in, in that time.

14 **SIR WYN WILLIAMS:** Yes, I am reasonably happy to go
 15 until about 4.45. Thereafter, I have to say my
 16 concentration levels will start to waiver but
 17 I'm sure that Mr Blackburn would prefer to
 18 finish if he could tonight.

19 **A.** I would. Thank you.

20 **MR STEVENS:** I have been asked if we can take
 21 a five-minute break for the purposes of the
 22 transcriber.

23 **SIR WYN WILLIAMS:** I tell you what, let's take five
 24 minutes and then everybody can sharpen
 25 themselves to try to finish by 4.45.

214

1 to the Hogsthorpe Post Office, who at the time
 2 was operated by David Hedges who liked to be
 3 known as Tom Hedges. Mr Hedges is a Core
 4 Participant in this Inquiry who has provided
 5 a witness statement, and this is an email from
 6 Karen Arnold; do you recall who she was?

7 **A.** I'm going to say that generic term again, Retail
 8 Network Management arena. Yeah.

9 **Q.** It says:
 10 "Further to our conversation last week
 11 regarding the losses at Hogsthorpe, the SPMR
 12 David Hedges (who liked to be known as Tom) has
 13 contacted the NBSC to establish what the
 14 BAU ..."
 15 Is that business as usual?

16 **A.** Yes.

17 **Q.** "... BAU/correct process is for suspending
 18 a session of Smartpost."
 19 Can you assist us with what Smartpost is?

20 **A.** Only it was a transaction at the time. I can't
 21 remember what, specifically, but it was
 22 a posting transaction.

23 **Q.** It says:
 24 "Tom tells me that the NBSC said it was okay
 25 to use either of the methods he describes. As

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1 a reminder, I have copied information below in
2 respect of what described to me last week."

3 That is over the page. We don't need to
4 look at that in any detail.

5 If we could have on the screen at the same
6 time, please, paragraph 21 of your witness
7 statement on page 11, and on the actual
8 document, POL00021163. If we could go to
9 page 5, please. If you go below that for the
10 time being. Thank you.

11 Your response on 7 July was to say that:

12 "Fujitsu would not check a replace processor
13 automatically, but I don't believe that would
14 add any value in this instance. As we discussed
15 last week the most likely explanation was/is
16 user error, but given the always into NBSC and
17 HSD, we should assume that this is not the root
18 cause at this time."

19 In your witness statement at paragraph 21,
20 you say:

21 "When Karen Arnold first contacted me, my
22 initial response comes from my preempting the
23 most likely root cause of the problem being
24 within branch, which was purely based upon the
25 fact that at the time I had no understanding, or
217

1 absence of the general stance, rightly or
2 wrongly, was that it was more likely to be user
3 error interacting with the service in completing
4 the transaction incorrectly.

5 **Q.** Please can we bring that document back up. So
6 it's POL00021163, and I think it was page 4.

7 Yes. The bottom paragraph of your email. You
8 say:

9 "If Tom has specific information such as
10 transaction time and values, please send this
11 across and I will get Fujitsu to investigate
12 immediately. If has no evidence then I'm afraid
13 there is nothing for Fujitsu to investigate."

14 What evidence could Mr Hedges have provided
15 which Fujitsu or the Post Office didn't have
16 access to?

17 **A.** Yes, I think ultimately it would have been the
18 accounting, the transaction logs, the trial
19 and/or final balances. But it's right that that
20 would have all been available to Fujitsu,
21 correct.

22 **Q.** What was the reason for asking Mr Hedges for
23 this?

24 **A.** I can't recollect, but I think it comes from my
25 previous statement about in the absence of --
219

1 even belief, that the Horizon application could
2 or did generate erroneous discrepancies linked
3 to this transaction type."

4 Now when you say that, are you saying
5 transaction type is Smartpost?

6 **A.** Yes.

7 **Q.** So you were aware of the ability of Horizon to
8 create discrepancies --

9 **A.** The general was, we've discussed, yes. I was
10 particularly -- hence I chose my words quite
11 carefully there. It was Smartpost,
12 specifically.

13 **Q.** Thank you. We can take down the witness
14 statements, then, for the time being. Why did
15 you think user error was the most likely
16 explanation, even though you had seen evidence
17 of bugs, errors and defects in Horizon in other
18 areas?

19 **A.** It's I think an example, looking back, of just
20 how we all thought, behaved, believed, worked
21 within the processes. And that's despite -- and
22 I know that sounds incredibly silly to say that
23 at the end of this review, but that is how we
24 believed, if there had to be evidence to support
25 Horizon creating discrepancies. So in the
218

1 you know, it wasn't automatically taken forward.

2 **Q.** Please could we look at page 3 now. So Karen
3 Arnold replies, saying:

4 "I'm not sure why Fujitsu would be changing
5 the processor if they didn't think there was
6 a problem.

7 "Having spoken to Tom today, once the new
8 processor is install he is going to do a BP
9 rollover and then keep a tally manually of every
10 Smartpost item to check against Horizon. This
11 however won't help anything that has gone [on]
12 previously."

13 Pausing there, if Mr Hedges receives a new
14 processor unit, approaches his transactions in
15 the same way, and he stops getting the
16 discrepancies, that suggests that the processor
17 is at fault.

18 **A.** It certainly could have been an explanation,
19 yes.

20 **Q.** If he still had discrepancies, that would
21 suggest that the processor itself wasn't at
22 fault, it may have been something else --

23 **A.** Yes.

24 **Q.** -- it may have been the Horizon System, but not
25 the processor.
220

1 So changing the processor would give you
2 some evidence relevant to determining the cause
3 of the problem; do you accept that?

4 **A.** Yes, it could have done, yes.

5 **Q.** Can we turn to page 2, please. You reply on
6 2 July. You say:

7 "Karen,

8 "Fujitsu have always had a preventative
9 maintenance policy and therefore sometimes will
10 swap out kit without actually finding a fault.
11 Also it generally helps with customer perception
12 of the service they have received. I accept in
13 this instance that this policy could work
14 against us, but are you suggesting that if after
15 swapping the processor and all discrepancies
16 cease, that Tom will claim this is clear proof
17 of Horizon creating discrepancies? I strongly
18 suggest that Tom obtains the necessary evidence
19 now, if it is available."

20 Pausing there, can we at the same time,
21 please, show your witness statement page 11,
22 paragraph 21. At the bottom, it's three
23 quarters of the way down, you say:

24 "I went on to offer advice which was to
25 obtain evidence prior to requesting that Fujitsu

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1 **Q.** But the processor could have been replaced
2 without losing the information and continued the
3 investigation?

4 **A.** It could have been, I believe, yes.

5 **Q.** When you're saying "this policy could work
6 against us" here, are you referring to the loss
7 of investigative options or are you referring to
8 the fact that it may have shown a problem with
9 the Horizon System?

10 **A.** No, it's the first thing. I was -- again,
11 rightly or wrongly at the time, I was really
12 wanting the postmaster to try and gather the
13 evidence so that we could take forward
14 an investigation. The option of simply having
15 the processor replaced, for me, was one that
16 I would rather have avoided at the time.
17 I don't know what followed this particular stage
18 of the investigation, because I don't believe it
19 was the end of it, but this was only a step in
20 my belief, my mindset at the time. Let's have
21 one more go at trying to obtain the evidence.
22 Is there anything there that allows me to take
23 that forward in the way we discussed earlier
24 with Fujitsu, rather than have it removed and
25 potentially lost?

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1 attend site. Fujitsu had, at the time, a basic
2 maintenance policy which was to replace hardware
3 (if they couldn't find an obvious onsite fix or
4 explanation). This policy was also likely
5 driven by the need to fix and close calls as
6 quickly as possible, driven by service level
7 targets. In this instance that would have led
8 to a loss of information contained in that
9 processor that potentially supported the
10 postmaster at Hogsworth [sic]. Hence my
11 reference to 'this policy could work against us'
12 that this cause of action could lead to an end
13 of investigative options and establishing root
14 cause."

15 Insofar as Fujitsu were planning to change
16 the original processor, there was no indication
17 they were going to simply destroy it, was there?

18 **A.** No, it went into -- so processes were recycled.

19 The Post Office only had so many, you know,
20 sufficient to support the branch network with
21 the spares to keep the whole cycle going. So
22 without any intervention, that processor would
23 have just simply been swapped, gone back into
24 the recycling process and wiped, in effect, in
25 terms of any information contained on it.

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1 Despite what you just said a few minutes
2 ago, Sam, if we'd have replaced the processor
3 and the new processor didn't display the same
4 symptoms and errors, I believe that there's
5 a strong possibility that would equally have led
6 to an end to the investigation and there would
7 have been an assumption made that the
8 discrepancies were created in branch, rather
9 than the technology.

10 **Q.** Was this not a type of case where keystroke data
11 may have been of assistance?

12 **A.** Yes, I think it probably would have done, on
13 reflection, but I don't remember, and clearly
14 haven't mentioned it at this point in time, and
15 I don't remember it being raising subsequently
16 either.

17 **Q.** Thank you. If we could take down the witness
18 statement, please, but keep up the document. If
19 we go up to the next page where it's John
20 Breeden's email. If we could go to the next
21 page up, please. Thank you.

22 This is an email from John Breeden on
23 3 July. Do you recall who John Breeden was?

24 **A.** Again, Retail Network. Possibly Karen Arnold's
25 line management chain. More senior.

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1 Q. It says:

2 "I have read the recent emails on the above
3 and considered the information. I am concerned
4 if we swap the processor now and the errors stop
5 this could lead to (i) a claim that Horizon has
6 problems in its accuracy and fuel some of the
7 recent press articles and (ii) the SPMR will
8 claim that all previous errors are down to
9 Horizon and we have no way to disprove this if
10 everything is resolved when the new processor is
11 installed."

12 Over the page, it goes on to say:

13 "I think we need to think this one through
14 carefully and the SPMR should be providing
15 evidence to support his claims which can be
16 investigated before we change pieces of
17 equipment."

18 So at this stage, was there a general
19 concern in Post Office affecting investigations
20 about the risk of litigation relating to
21 Horizon?

22 A. Well, the retail network managers would be
23 better placed to answer that, but as maybe
24 I mentioned earlier, I believe, you know, there
25 was an upward trend in the volume of this type
225

1 higher, but the IT directorate and function
2 would have been the ones communicating to the
3 likes of myself.

4 Q. Do you think the points mentioned by Mr Breeden
5 in points (i) and (ii) here are in any way
6 appropriate considerations to take into account
7 when deciding how to investigate potential
8 discrepancies?

9 A. Well, you know, again, it's passage of time,
10 isn't it? But it's interesting that John seems
11 to be coming to the same conclusion as me in
12 terms of the process we're following, but for
13 a slightly different reason. My entire job was
14 about trying to resolve issues and fix issues on
15 behalf of the Post Office and the postmasters,
16 not to be covering up anything or being
17 negative. So for me personally, no, it was not
18 a criteria that was necessary in determining
19 what actions we were going to take.

20 Q. Can we quickly bring up, please, POL00012547 at
21 page 3. Under the Wednesday entry -- sorry,
22 this is a note from Karen Arnold. It's on this
23 issue. On the Wednesday entry, it says:

24 "Checked with Paul Kellett and no losses
25 settled centrally on 05.08.09. Contacted Tom
227

1 of enquiry. So that would make perfect sense if
2 there was.

3 Q. If we look at that email, I think if we go up,
4 in August 2009 -- sorry, July 2009. Were you
5 aware of a *Computer Weekly* article in May 2009
6 regarding the robustness of Horizon?

7 A. Actually, now you mention it, I think that was
8 one of the things that we were all informed
9 about, yes. So I think it was brought to our
10 attention as staff members.

11 Q. What was said to you, in respect of that
12 article?

13 A. I think it was -- and again, I'm sorry, because
14 this is just, as you can tell, how I believed it
15 was at the time and how we were, and how we
16 operated, but I believed, again, we were
17 reassured that Horizon was fit for purpose.

18 Q. Shaun Turner today gave evidence that
19 communications on that issue came down from what
20 he thought were board level, regarding the
21 robustness of Horizon in response. Would you
22 agree with that?

23 A. Yes. I mean, the part of the business I worked
24 in is where the message would have come from,
25 ultimately, I would assume. It's come from
226

1 who confirmed he had been short by approximately
2 £40 on his last BTS, and had made this good.
3 Advised that Fujitsu confirmed that they have
4 not found any system errors which would have
5 caused the discrepancies and concluded that
6 there was nothing wrong with the processor.
7 Advised Tom that he needs to provide evidence to
8 support any claims that the problems with losses
9 were as a result of Horizon and that he is
10 responsible for making the losses good."

11 So these discrepancies, you accept, are
12 something for which Mr Hedges could have --
13 well, would have been asked to make them good
14 and settled them himself?

15 A. It certainly looks that way. That's the way
16 I interpreted that, yes.

17 Q. If he didn't, he could face suspension?

18 A. Err, I'd like to think not, but that was outside
19 of my remit. It was retail network management
20 process.

21 Q. In this case Mr Hedges, in due course, was
22 convicted of a criminal offence arising from
23 issues relating to discrepancies for which his
24 conviction has been overturned. Were you
25 involved in that element of his case?
228

1 A. That's news to me. I didn't know that.
 2 Q. In this case, the fact that Fujitsu said they'd
 3 found no problems with the system, we discussed
 4 in your evidence earlier that there was no -- or
 5 you didn't have sufficient support internally
 6 with IT to check what they were saying, and you
 7 relied on their expertise?
 8 A. *(The witness nodded)*
 9 Q. Was this a case where you would have gone to
 10 someone within IT to check on it?
 11 A. I would have liked to have had the opportunity.
 12 I really think that that wasn't the case.
 13 I don't think that this investigation went --
 14 I mean, naturally emails don't record
 15 everything, there were lots of conversation, but
 16 I think that this pretty much summarises the
 17 investigation.
 18 Q. I'm going to simply ask you now to turn to
 19 page 15 of your statement, please. In it, you
 20 say that:
 21 "[You] have chosen to remain with the IT
 22 service industry, and if I've learnt one thing
 23 during that time, it is that IT can and does
 24 fail and that people are fallible and make
 25 mistakes. It is how you respond to those
 229

1 A. It's hard for me to reconcile, years down the
 2 line, in my mind, given all the evidence that
 3 we've gone through today with me, let alone what
 4 I'm sure you've gone through throughout the
 5 Inquiry, how the HR and the human element was so
 6 misaligned. It almost feels to me that there
 7 was some disconnect between the reality of what
 8 we were all trying to manage in the right way,
 9 for the right reasons, and the impact and the
 10 outcome.
 11 I just cannot understand, probably because
 12 I wasn't part of that part of the business,
 13 I didn't see what retail network managers had to
 14 go through, the policies that they had. I'm not
 15 even familiar with a subpostmaster's contract,
 16 for example. But still find it very hard for
 17 you to tell me that the gentleman at Hogsworth
 18 *(sic)*, you know, suffered in that way, off the
 19 back of something where there was clearly
 20 an element of doubt.
 21 And I think that's the thing for me. There
 22 was doubt. Despite the messages, despite
 23 Horizon has no integrity issues, messages
 24 constantly coming down. Clearly there's
 25 evidence to say that there were some problems,
 231

1 circumstances that matter. Openness and honesty
 2 is, and always will be, the best policy.
 3 Clearly there were occasions when the benefit of
 4 doubt could and should have been given. I'm
 5 sickened by what I've read post-my time at Post
 6 Office and have experienced a wave of emotions
 7 from sadness, shame and anger."
 8 Do you think the Post Office should have
 9 been more open and honest?
 10 A. With the benefit of hindsight, in some respects,
 11 but yes, clearly.
 12 Q. If so, how? In what ways?
 13 A. I think I can only try and convey what I thought
 14 my role was, and it wasn't to cover up any
 15 issues with technology. It was to ensure that
 16 we were providing a quality service to the
 17 British public through the branch network and
 18 that includes the independent network.
 19 Everything I ever tried to do, and my team tried
 20 to do, was for that end and that benefit.
 21 To watch the programme, as I did two years
 22 ago on TV, and see people rather than FAD codes
 23 was ... was difficult. Apologies.
 24 Q. There is no need to apologise. If you wish to
 25 take a moment, please do so.
 230

1 that there were risks involved. And they may
 2 have been small in the greater context, as in
 3 the volume of -- I appreciate the impact has
 4 been huge on individuals, but I find that --
 5 I simply can't reconcile it, in my own mind now,
 6 today, I'm afraid. Hence the emotional words
 7 I've used there, and that's where the anger
 8 comes from as well. I worked very hard.
 9 MR STEVENS: Mr Blackburn, I don't have any further
 10 questions but is there anything further you
 11 would like to say before I ask if the Core
 12 Participants ...
 13 A. No, I just hope that it's of use.
 14 SIR WYN WILLIAMS: Are there any other questions?
 15 MS PAGE: Sir, I just would like to follow on with
 16 the rest of what is actually in the same
 17 paragraph that Mr Stevens has just referred to,
 18 if I may.
 19 SIR WYN WILLIAMS: All right.
 20 MS PAGE: It's very brief.
 21 SIR WYN WILLIAMS: Yes.
 22 **Questioned by MS PAGE**
 23 MS PAGE: At the end of that same paragraph, you
 24 said that:
 25 "If [you'd] had more visibility of the
 232

1 action that was taken against subpostmasters,
 2 you hope that you would have found the courage
 3 to challenge, sound a note of caution, and
 4 promote the communication of outcomes more
 5 vigorously and robustly than I perhaps did."
 6 **A.** Yes.
 7 **Q.** My question is simply: what do you think the
 8 reaction of those above you would have been if
 9 you had?
 10 **A.** Well, I think the fact that I didn't probably
 11 gives you your answer. I don't think --
 12 a highly politicised organisation, very
 13 hierarchical, I'd have been seen as stepping out
 14 of line with the message. I can't imagine that
 15 that would have been good for my career, so I'm
 16 sure at that point in time -- and this is
 17 obviously a hindsight reflection -- I obviously,
 18 on occasions, chose to unconsciously protect
 19 myself.
 20 **MS PAGE:** Thank you. That's all I wanted to ask.
 21 **SIR WYN WILLIAMS:** Thank you, Ms Page.
 22 Thank you, Mr Blackburn, for firstly giving
 23 a witness statement and, secondly, answering
 24 a good deal of questions this afternoon and I'm
 25 grateful to you for the frankness with which you

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1 have expressed some of your emotions.
 2 So I'm glad we were able to complete today.
 3 I'm sure that's of great relief to you. I'll
 4 see everybody else at 10.00 tomorrow morning.
 5 **MR STEVENS:** Thank you, sir, and we're hearing from
 6 Anne Allaker and Gayle Peacock.
 7 **SIR WYN WILLIAMS:** Yes, thank you.
 8 **MR STEVENS:** Thank you, sir.
 9 **(4.45 pm)**
 10 **(The hearing adjourned until 10.00 am**
 11 **the following day)**
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