

Tuesday, 7 March 2023

1
2 (10.00 am)
3 MR STEVENS: Good morning, sir, can you see and hear me?
4 SIR WYN WILLIAMS: Yes, I can, thank you.
5 MR STEVENS: Thank you, sir. This morning we will be
6 hearing evidence from Elizabeth Evans-Jones, but earlier
7 today a few further documents were provided for her to
8 consider and I would ask that we could adjourn her
9 evidence by 15 minutes to allow a bit more time for her
10 to consider those documents.
11 SIR WYN WILLIAMS: Yes, of course, Mr Stevens. So we will
12 begin as soon after 10.15 as you think appropriate.
13 MR STEVENS: I'm very grateful. Thank you, sir.
14 SIR WYN WILLIAMS: Right.
15 (10.01 am)
16 (A short break)
17 (10.16 am)
18 MR STEVENS: Sir, can you see and hear me?
19 SIR WYN WILLIAMS: Yes, I can, thank you.
20 MR STEVENS: Thank you for the time. If I may call
21 Ms Evans-Jones.
22 ELIZABETH JANE EVANS-JONES (affirmed)
23 Questioned by MR STEVENS
24 MR STEVENS: Good morning. As you know, my name is Sam
25 Stevens and I ask questions on behalf of the Inquiry.

1

1 1999 --
2 A. I did.
3 Q. -- and you joined Fujitsu in October 2005 to work on the
4 Post Office Account?
5 A. That's correct, yes.
6 Q. You were a Service Delivery Team manager?
7 A. I was, yes.
8 Q. If you could just move slightly closer to the
9 microphone, it's just -- thank you, I'm very grateful.
10 A. You're welcome.
11 Q. Prior to that role, could you summarise any
12 qualifications that you had that were relevant to
13 carrying out that job?
14 A. So I was ITIL certified Version 3 Expert, so that's the
15 IT Infrastructure Library, which delivers best practice
16 in terms of how to manage and delivery services.
17 Q. What work experience or professional experience had you
18 had in delivering a role like that prior to joining
19 Fujitsu?
20 A. So prior to joining Fujitsu, I worked in Threadneedle
21 Asset Management where I ran the service management
22 department for a period of time; I was also a change
23 release and configuration manager; and previous to that,
24 I worked for Yellow Pages also in ITIL service
25 management functions.

3

1 Please could you state your full name?
2 A. Elizabeth Jane Evans-Jones.
3 Q. Firstly, thank you for giving evidence to the Inquiry,
4 both in a written statement which we'll turn to today
5 and also for attending to give oral evidence, and
6 considering the additional documents that we gave to you
7 this morning. You, should have a written statement in
8 front of you in the bundle of documents under tab A. Do
9 you have that there?
10 A. I do, yes.
11 Q. It runs to 21 pages.
12 A. It does indeed, yes.
13 Q. On page 16, there should be a final paragraph 43 --
14 A. Mm-hm.
15 Q. -- and beneath that a statement of truth and your
16 signature. Is that your signature?
17 A. I can confirm it is, yes.
18 Q. Can you confirm that the contents of that statement are
19 true to the best of your knowledge and belief?
20 A. Absolutely, yes.
21 Q. Thank you. That stands as evidence in the Inquiry now
22 and, for the transcript, the reference is WITN06680100.
23 I am going to ask you some more questions about it but
24 not cover everything that's within it.
25 Firstly, by way of background, you graduated in

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1 Q. When the role came up for you to join Fujitsu, do you
2 recall how you were selected for it?
3 A. I was recommended by a colleague who used to work --
4 I was put forward -- who I used to work with at
5 Threadneedle, he put me forward for the application to
6 Fujitsu. I then went through two or three rounds of
7 interviews with Fujitsu and then I was selected for the
8 role.
9 Q. You stayed in the role on the Post Office Account until
10 December 2007?
11 A. That's correct.
12 Q. Then you moved to a different account but within
13 Fujitsu?
14 A. That's correct, yes.
15 Q. When you were working for that different account, from
16 December 2007 onwards, did you have any more working or
17 dealing with the Post Office Account?
18 A. Not from a work perspective. Obviously I had colleagues
19 that I interacted with but not from a work perspective.
20 Q. So when you finished on the Post Office Account in
21 December 2007, that's your last dealings with the
22 Horizon and the Post Office Account?
23 A. Correct.
24 Q. You left Fujitsu in August 2010?
25 A. December -- err, yes, August 2010, that's correct, yes.

4

- 1 Q. I want to look at support services generally first.
 2 You're primarily going to talk about what was known as
 3 either the Horizon System Helpdesk or the Horizon
 4 Service Desk?
 5 A. Mm-hm.
 6 Q. I'm just going to refer to it as the Helpdesk for
 7 today --
 8 A. Okay.
 9 Q. -- and that was first line support.
 10 A. Correct.
 11 Q. From an IT background, how would you describe the
 12 purpose of first line support?
 13 A. From an ITIL perspective, it's intended to be the single
 14 point of contact for clients to interact with
 15 an organisation, be that for software, hardware, or
 16 general queries. The desk should then log the incident,
 17 so that it's captured from a volumetric perspective,
 18 attempt to troubleshoot and resolve at first point of
 19 contact, if not possible to resolve, then to refer that
 20 through to second or third line support, depending on
 21 the processes.
 22 Q. So one of the purposes is to try to resolve the issue at
 23 first line and then, if not possible, refer up to the
 24 second line or third line?
 25 A. Yeah.

5

- 1 being resolved by first line support and then second
 2 line?
 3 A. Speaking in general terms, no, it depends very much on
 4 the nature of the service that's been provided, the
 5 access that a service desk may have. So, no, I don't
 6 believe it's possible to generalise to say how much
 7 should be resolved at first point of contact.
 8 Q. Please can we turn to your witness statement, and it's
 9 paragraph 14, on page 4. You say that to explain your
 10 role:
 11 "... I will briefly outline Fujitsu Core Services
 12 and Account model, as it was in existence when I was
 13 employed by the company. At this point in time,
 14 services in Fujitsu were either provided by Core
 15 Services or were Account Owned Services."
 16 Please could you explain what Fujitsu Core Services
 17 were?
 18 A. Absolutely. I tried to articulate in the following
 19 paragraph, in paragraph 15. So Core Services were
 20 services that would be provided to multiple accounts.
 21 So the examples that I gave in paragraph 15 would be,
 22 for example, the service desk or engineering services,
 23 and the reason for that was that they were activities
 24 that could be customised for particular accounts. So
 25 a service desk has very much the same purpose for one

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- 1 Q. On the Post Office Account, second line support, we
 2 understand, was provided by the Systems Management
 3 Centre or SMC?
 4 A. Depending on the nature of the incident, so second line
 5 for hardware faults would be potentially engineering
 6 services but for software, yeah, absolutely, through to
 7 the SSC, I believe the team was called.
 8 Q. So the SSC -- we have heard about the SSC at third line.
 9 Do you recall the SSC, the System Support Centre?
 10 A. I don't recall which was first and which was second and
 11 which was third line.
 12 Q. But for second line support, let's just deal with that,
 13 as a matter of generality first, from an IT perspective
 14 what does the second line support do, what is its
 15 purpose?
 16 A. The purpose of second line support is to take
 17 an incident which can't be resolved at the service desk,
 18 at first point of contact, and investigate further,
 19 attempt to resolve and, if resolution is not possible,
 20 then to pass that through to third line support.
 21 Q. In terms of -- I'm not sure if you can say this as
 22 a matter of generality, but in terms of proportions of
 23 problems that should be resolved at first line or at
 24 second line or at third line, is there a general rule of
 25 thumb as to how many incidents should be capable of

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- 1 account as for another account; engineering, again, very
 2 much the same purpose for one account or for another
 3 account.
 4 So Fujitsu, at the time, had the model of having
 5 these Core Services accounts and then anything that was
 6 very specific to an account, for example, in Post
 7 Office, would be part of the account team. One of the
 8 key differentiators there is the fact that the resource
 9 and the management of those services resided with Core
 10 Services and the Core Services management structure,
 11 whereas any account owned services resided with the
 12 account for its management and its performance levels.
 13 Q. You're quite right. You do say in your statement that
 14 the Helpdesk was a core service. So does that mean that
 15 the people who were dealing with Helpdesk enquiries,
 16 sitting on the phones, would also be dealing with calls
 17 related to different accounts?
 18 A. No.
 19 Q. No?
 20 A. So they were ring-fenced resources that were dedicated
 21 to Post Office, they were trained to support the Post
 22 Office Account. But the management structure was under
 23 Core Services. So the operations manager sat in Core
 24 Services, again ring-fenced for Post Office Accounts.
 25 There were other accounts sitting in Core Services where

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1 there were shared services but Post Office Account was
2 not one of those. The resources were dedicated to Post
3 Office Account or supporting Post Office.

4 **Q.** On that point, please could we bring up FUJ00080478,
5 page 8, please. This is a document concerning the
6 Horizon Service Desk and described as a joint working
7 document. If we could just go to the bottom of this
8 page, please, just to get the date. It's 4 September
9 2008, and if we could focus in on paragraph 2.4, please.
10 It says:

11 "Fujitsu Services may provide a non-dedicated
12 service desk function sharing the resource with other
13 Fujitsu Services customers as described within this
14 Service Desk, Service Description."

15 So is it the case that Fujitsu may be entitled to
16 have a service desk which dealt with other Fujitsu
17 accounts?

18 **A.** Mm-hm.

19 **Q.** But from your time there and your recollection, it did
20 not, in fact, do that?

21 **A.** Absolutely. Absolutely. I guess that's the nature of
22 Core Services. Shared services desks could be put in
23 place but for Post Office Account it was a dedicated
24 desk due to the size of the account.

25 **Q.** Do you recall how many people were available to work in
9

1 **Q.** Was there anything about this Helpdesk, the Horizon
2 Helpdesk that took it out of the norm that meant more
3 advanced qualifications were needed or less?

4 **A.** No. The opposite. The Horizon Service Desk, from my
5 recollection, had very limited opportunity to resolve at
6 the first point of contact. So, from my recollection,
7 a lot of the calls that came through were related to
8 hardware, a reboot was the maximum that the Service Desk
9 could do there and that would be dispatched to
10 engineers.

11 There was also a Knowledge Base that laid out
12 step-by-step instructions as to what the Service Desk
13 could do. But to my -- the best of my recollection, the
14 IT Service Desk, the Horizon Service Desk was not
15 a technical service desk, not particularly technical.

16 **Q.** I certainly want to come to explore some of those issues
17 shortly. Before doing that, do you recall the training
18 that was made available to members of the Horizon
19 Helpdesk?

20 **A.** I don't. I know that there was training and I refer to
21 that in my statement. I know there was a training
22 programme put in place. I don't recall the duration nor
23 do I recall the contents of that.

24 **Q.** Do you know who would be responsible for ensuring that
25 members of the Horizon Service Helpdesk -- sorry,

11

1 the Helpdesk whilst you were working there?

2 **A.** I don't have the recollection as to how many people.

3 **Q.** Do you recall the types of minimum qualifications that
4 a person would need to be employed on the Horizon
5 Helpdesk?

6 **A.** Again, I don't recall the qualifications. I wasn't
7 involved in the selection of the resources to go on to
8 the Service Desk. I can speculate that it was due to --
9 it was the client engagement, the ability to communicate
10 effectively with end callers, to be able to deal with
11 sometimes challenging conversations, but -- and IT
12 experience, and again that would be my speculation based
13 on my experience of running other service desks.

14 **Q.** Would you -- again I appreciate you don't have knowledge
15 of what these people actually required or what the
16 qualifications were, but in terms of -- from your
17 experience, would you expect that people working on the
18 Helpdesk would need some form of IT qualification?

19 **A.** Yes.

20 **Q.** What level would that be?

21 **A.** Again, it depends on the service desk that's being
22 supported and the level of technicality of the service
23 desk, but fundamental understanding of IT services would
24 be, in my opinion, a requirement to be on an IT service
25 desk.

10

1 Horizon System Helpdesk, were properly trained?

2 **A.** The operations manager for the Horizon Service Desk in
3 Core Services.

4 **Q.** Who was that during your time there?

5 **A.** Paul Gardner, ^name I believe was his name.

6 **Q.** Before moving on, if you can help us with this core or
7 account -- so Core Services or Account Services, do you
8 remember whether the second line support, SMC, would be
9 Core or Account Services?

10 **A.** I don't recall. I don't recall.

11 **Q.** Let's move to look at your role, then, as Service
12 Delivery Team manager. We don't need to bring it up but
13 paragraph 17(a) you say that you managed the team of
14 service delivery managers --

15 **A.** Mm-hm.

16 **Q.** -- who provided both Core Services and account owned
17 services. How many people or service delivery managers
18 did you manage?

19 **A.** I believe it was around eight or nine service managers.
20 It changed over the two years. Eight or nine is my
21 recollection.

22 **Q.** How many of those would be responsible for work relevant
23 to the Horizon Helpdesk?

24 **A.** I had one service delivery manager who was the key
25 interface for the Horizon Service Desk.

12

1 Q. Who was that?
 2 A. I don't recall his name, the role changed. Ian Mills,
 3 I believe, at one point was involved in the Horizon
 4 Service Desk. I don't recall the name.
 5 Q. What was his day-to-day responsibility for the service
 6 desk?
 7 A. So he would interface with -- he would almost be the
 8 conduit between the account team and the Core Services
 9 team that provided the Horizon Service Desk. So he
 10 would -- Ian or other people who held that role -- would
 11 be looking at the metrics -- the Service Desk metrics in
 12 terms of average speed of answer, dealing with any
 13 escalations that came through, making sure that the Desk
 14 was resourced appropriately. So he would work very
 15 closely within the operations manager for the Horizon
 16 Service Desk and also interact -- he was the
 17 representation and interaction with Post Office, as
 18 well. We had operational reviews around the Horizon
 19 Service Desk performance.
 20 Q. Did the operations manager report to you?
 21 A. Paul Gardner?
 22 Q. Paul Gardner?
 23 A. No.
 24 Q. Who did Paul Gardner report to?
 25 A. His management structure in Core Services.

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1 A. Yeah, so to clarify, the actual achievement of those
 2 performance metrics sat with the operations manager in
 3 Core Services, as did the quality. In the event that
 4 those metrics dropped down or the quality dropped down,
 5 that would then be discussed by myself and by the
 6 Horizon Service Desk SDM and we would work
 7 collaboratively with Core Services to implement
 8 improvements to address the quality metrics or to
 9 address the performance metrics as well.
 10 And, as mentioned in my statement, if we received
 11 escalations from Post Office on the quality or on the
 12 performance metrics, we would work collaboratively to
 13 address those. So there were three parties involved in
 14 the process: the Core Services team, the account team
 15 and Post Office Limited.
 16 Q. Just to make sure I've got this, the operations manager,
 17 Paul Gardner, he had day-to-day responsibility for
 18 ensuring that the quality and volumetrics were to the
 19 required standard?
 20 A. Yes.
 21 Q. You would monitor that --
 22 A. Mm-hm.
 23 Q. -- and step in when there was a drop --
 24 A. Mm.
 25 Q. -- and come up with ways or devise strategies to improve

15

1 Q. Who did you report to?
 2 A. The head of service delivery management for Post Office
 3 Account.
 4 Q. Let's look, then, in more detail at the Helpdesk itself.
 5 Please can we look at your witness statement again,
 6 page 5, paragraph 17(a). You set out your role "To
 7 manage a team of SDMs" and, in respect of the Horizon
 8 Service Desk:
 9 "... involved engaging with the Core Services
 10 Operations Manager to ensure delivery against the agreed
 11 performance metrics of the first-line desk, and
 12 improvement of the service. Ensuring that the Core
 13 Service function was in line with the profit and
 14 loss/business case, the [Horizon Service Desk Service
 15 Delivery Manager] also managed escalations from [Post
 16 Office Limited] on the performance of the Service Desk
 17 with the Core Services Team."
 18 A. Mm-hm.
 19 Q. So is it fair to say in terms of both -- your
 20 responsibilities were both for the volumetrics, in the
 21 sense of how many calls were answered, the speed of the
 22 calls.
 23 A. Mm-hm.
 24 Q. Was the quality of the advice provided also within your
 25 responsibility?

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1 it to get it back to the contractually agreed level of
 2 service?
 3 A. Yeah, there was almost the layers-off accountability.
 4 So Paul was accountable for the Service Desk, myself and
 5 my team were accountable to Post Office for those
 6 quality and the service metrics. We had to make ensure
 7 the service was delivered in line with the contractual
 8 metrics.
 9 Q. So in doing that role, whilst not immediately day-to-day
 10 responsible for the service desk, you had awareness of
 11 its operation and its function?
 12 A. Absolutely, yeah.
 13 Q. Turning then to its function, you state in your witness
 14 statement, you say that -- this is paragraph 20:
 15 "The HSD was primarily a log and flog function, as
 16 there were very limited first line/level fixes that the
 17 desk could complete."
 18 A. Yeah.
 19 Q. Can I ask you to expand on "log and flog"?
 20 A. Yeah, so as referred to the Horizon Service Desk really
 21 had limited opportunity to resolve at first point of
 22 contact. So log and flog is a generic term used in the
 23 industry which is basically to log a ticket and then
 24 pass it through to the next level of support, be that
 25 hardware, software or query management.

16

1 Q. Why were there such limited first line fixes available
2 for the Horizon Service Desk?
3 A. So a large number of the incidents that were logged were
4 hardware related. Again, as I've articulated, very
5 little could be done on a hardware issue, apart from to
6 try and reboot the counter. If the counter was down,
7 that caused issues for the Post Office. So the approach
8 that was taken if the reboot didn't work -- and that
9 normally took about 20 minutes -- we'd dispatch the
10 engineer to get an engineer on site as quickly as
11 possible to allow the branch to trade again.

12 Single-counter branches was obviously more critical
13 than multi-counter branches. Again, with keypads --
14 and, again from my understanding, there was very limited
15 software fixes that the desk could do anyway because
16 I don't believe they had access to fix anything with the
17 software. They'd look in the Knowledge Base, if there
18 was no immediate resolution that was documented in that,
19 they would then pass that through to the second line
20 support or third line support.

21 Q. Again, something else that we will come to in due course
22 but the types of calls, let's just cover that for
23 a moment. You said there were a lot of hardware calls?

24 A. Mm-hm, yeah.

25 Q. The Inquiry has heard a significant amount of evidence

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1 was Post Office would escalate to me directly or the
2 Service Desk would escalate to the Service Delivery
3 Manager for that function, and then they would escalate
4 to me if they were unable to resolve that escalation.

5 Q. You say there you were aware of the reports of SPMs
6 saying that the system could cause discrepancies.

7 A. Mm-hm.

8 Q. Was that common knowledge in the Helpdesk, of the fact
9 that SPMs were making such allegations?

10 A. I'm unable to comment on whether the Service Desk
11 thought this was common knowledge or not. As I say,
12 the -- I really have no recollection of whether I knew
13 that or not.

14 Q. Stepping back, then, from the Service Desk, amongst your
15 colleagues you worked with day to day, was it a known
16 fact that allegations by SPMs were being made that the
17 Horizon System could cause discrepancies?

18 A. Again, it's not an area that I was particularly involved
19 in. I think there was some awareness that there were
20 discrepancies but, again, I'm not sure of how widely
21 that was known, nor did I have any understanding about
22 the scale of discrepancies that could be caused.

23 Q. Are you aware of anything that was done to investigate
24 those allegations within Fujitsu?

25 A. Not personally. As I say, my portfolio wasn't around

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1 from subpostmasters who stated that they faced
2 discrepancies in their accounts, which were generated by
3 Horizon. Do you recall there being a significant number
4 of calls relating to discrepancies which came in to the
5 helpdesk?

6 A. I would only have the classification of which the ticket
7 was logged against, the PowerHelp codes. I don't
8 know -- from best of my recollection, I'm not sure there
9 was a code that specifically called out discrepancy. So
10 I don't know. From my recollection, the bulk of the
11 calls that came through were hardware related calls or
12 branch services were offline, as in the BT network that
13 was put in place to the Post Office was offline, which
14 meant the branch couldn't trade.

15 Q. Please can we just bring up paragraph 41 of your witness
16 statement at page 16. Thank you. Here you say that:

17 "As a result of some of the escalated incidents,
18 which I directed to the Software Team, I was aware that
19 it had been reported by SPMs that the system could cause
20 branch discrepancies, however I do not recall these in
21 detail."

22 A. Mm-hm.

23 Q. Can you just summarise when you would become involved in
24 these escalated incidents, in your role?

25 A. Yeah, escalations generally came from two sources, one

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1 the software. It's my speculation that it was being
2 investigated by the second and third line support teams
3 in the software side of the support.

4 Q. I want to look at one of those escalations now, and turn
5 to a document which you were given this morning. It's
6 POL00028984. If we could go to page 10, please, at the
7 bottom. This is an email that the Inquiry has seen
8 before. It's from Sandra MacKay to Shaun Turner. It
9 says:

10 "Shaun, you may recall that in September the above
11 office had major problems with their Horizon system
12 relating to transfers between stock units."

13 Go over the page, please. Thank you.

14 The SPMR has reported that he is again experiencing
15 problems with transfers, (5 January '06) which resulted
16 in a loss of around [£43,000] which has subsequently
17 rectified itself. I know the SPMR has reported this to
18 Horizon Support, who have come back to him stating that
19 they cannot find any problem."

20 If we could go then to page 8, please, and to the
21 bottom. There's an email there from Gary Blackburn to
22 you on 15 February 2006. Do you recall Gary Blackburn?

23 A. I do, yeah.

24 Q. Who was he?

25 A. He worked on Post Office. I can't recall his exact role

20

1 but he was one of three or four people that I had
 2 regular contact with on the Post Office Account.
 3 **Q.** He forwards this email on to you --
 4 **A.** Mm-hm.
 5 **Q.** -- describing the detail, and says:
 6 "... could you please update me on the corrective
 7 action plan as this still appears to be occurring within
 8 the branch."
 9 Do you have any recollection of this matter?
 10 **A.** No, the first I remember of this is when this document
 11 was presented to me this morning.
 12 **Q.** If we go above, your response is -- just move up
 13 slightly so we can see the date, please. Thank you.
 14 On 16 February, you say:
 15 "Hi Gary,
 16 "I have checked the call and this issue is scheduled
 17 to be resolved in S90."
 18 Do you recall what S90 was?
 19 **A.** I don't.
 20 **Q.** If I said it was a release, a software release?
 21 **A.** I assume it's a release, yeah. I don't recall
 22 specifically what it is, no.
 23 **Q.** I appreciate you say you can't recall this incident at
 24 all, but how would you have gained this information to
 25 come back to Gary Blackburn with this response?

21

1 updates?
 2 **A.** Um, again, I don't recall in detail. I know the KELs
 3 would have been updated and that information, the latest
 4 information, would have been visible. To the best of my
 5 recollection, there was a process whereby information
 6 was circulated round the Service Desk but that wasn't
 7 for every single KEL that was updated.
 8 **Q.** Do you have any recollection of which KELs would be --
 9 **A.** I'm afraid I don't, no.
 10 **Q.** At page 5 of the document, if we can go down slightly
 11 please to the bottom -- thank you -- we see Gary
 12 Blackburn emails you back on 17 February. He's got some
 13 questions, which are over the page.
 14 In particular, one of them is:
 15 "Do we understand why this particular branch has
 16 been having problems? Or are there other branches in
 17 the network that have been having this problem?"
 18 If we go back to, I think, page 5, you send that on
 19 to Mike Stewart. Do you remember who Mike Stewart was?
 20 **A.** Yeah, he was a Service Delivery Manager who reported to
 21 myself and worked on online services.
 22 **Q.** What was the purpose of sending this to him?
 23 **A.** So he was closer to the applications and the systems to
 24 be able to investigate that. So it was common that
 25 I would then distribute the work to the people who had

23

1 **A.** I would have spoken to the second or third line support,
 2 third line in this case, for the Software Support Team.
 3 **Q.** Do you think you would have been concerned that the
 4 Helpdesk had initially advised the postmaster that this
 5 discrepancy was not a fault in the system when it
 6 transpired that it was a software problem?
 7 **A.** Yes, I believe I would have been concerned. The Horizon
 8 Service Desk would have followed whatever was in the
 9 knowledge database, so I would have been concerned that
 10 the information in the knowledge database would have
 11 been incorrect and that incorrect advice would have been
 12 given to the subpostmaster or the postmaster.
 13 **Q.** Can you recall if any steps were taken to address that
 14 concern?
 15 **A.** The KELs, the knowledge articles, were updated on
 16 a regular basis. They weren't updated by the Service
 17 Desk, again, so I can't recall if anything specifically
 18 happened in relation to this particular incident.
 19 However, there was a process to make sure that the KELs
 20 were updated with the latest information.
 21 **Q.** When KELs were updated like that, was it simply a case
 22 of there's a KEL on the system, an update has been made,
 23 so the next time someone accesses that KEL, they will
 24 see updated information, or was there a circular sent
 25 round to members of the Helpdesk to advise them of any

22

1 more knowledge around the content of the email.
 2 **Q.** Do you recall, after sending this email, if you had any
 3 more involvement with this issue?
 4 **A.** I don't recall the email. So, no, I don't believe I had
 5 any further involvement. From what I can see from the
 6 emails, I was even taken off the email exchange.
 7 **Q.** Can we go to page 3, please, and the email from Anne
 8 Chambers to Mike Stewart on 23 February. This isn't
 9 an email -- well, there's no evidence here to suggest
 10 you were sent this at the time. I just want to look at
 11 the second paragraph though, which says:
 12 "Haven't looked at the recent evidence, but I know
 13 in the past this site had hit this Riposte lock problem
 14 2 or 3 times within a few weeks. This problem has been
 15 around for years and affects a number of site most
 16 weeks, and finally Escher say they have done something
 17 about it."
 18 So this is, is it fair to say, talking about
 19 a fairly significant bug in the Horizon System code?
 20 **A.** It appears that way, yes.
 21 **Q.** Were you aware of this at the time at all?
 22 **A.** As I say, the only recollection I have now is from this
 23 email that was sent to me, was provided to me this
 24 morning. Until this point in time, I'd no recollection
 25 of the Callendar Square issue nor this Riposte lock

24

1 problem.

2 **Q.** If this information had been given to you at the time,
3 do you think it's something that you would have
4 remembered now?

5 **A.** Absolutely. Because, you know, it's a significant issue
6 and I would have absolutely done to the best of my
7 ability to make sure we investigated that properly. So
8 yeah and that's because of the person I am. So ...

9 **Q.** Thank you. That document can come down now.
10 We'll move on to a different matter which is the
11 types of calls you were referring to earlier, and if we
12 could bring up FUJ00083429. This is a Fujitsu Services
13 Post Office Account Service Review Book for February
14 2007. Can you briefly summarise what this document was
15 or the purpose of these types of document.

16 **A.** Yeah, it was a contractual obligation that each month
17 the Fujitsu Post Office Account had to provide this
18 through to Post Office and it outlined the performance
19 metrics for the key services that Fujitsu provided. So
20 there were performance metrics and commentary included
21 in there.

22 **Q.** Please can we turn to page 11. This is showing the
23 Horizon Service Desk, the table, unhelpfully in black
24 and white, but we can come to the numbers further down,
25 but is this showing that -- essentially showing the

25

1 13,000, to this 16,000 in January '07, 15,500 in
2 February '07.

3 **A.** Mm-hm.

4 **Q.** In terms of the breakdown of different types of calls
5 in, significant numbers for hardware?

6 **A.** Yeah.

7 **Q.** At the bottom, there is a collection for -- or
8 a category for software, as well. Can you recall or
9 where -- we discussed discrepancies earlier. Which
10 category do you think discrepancies would fall into,
11 reported discrepancies?

12 **A.** My assumption is that they would fall under software.

13 **Q.** Thank you. That document can come down. If we could
14 bring up FUJ00001966. This is a document dated
15 19 August 2005. So "Service Level Targets for Horizon
16 Services".

17 **A.** Mm-hm.

18 **Q.** So drafted just before, I think, you started on the Post
19 Office Account?

20 **A.** Yeah.

21 **Q.** At page 8, please, we have the service level targets
22 for, at the bottom, Horizon System Helpdesk.

23 **A.** Yes.

24 **Q.** The first three are, I think, to do with calls answered
25 and the proportion there?

27

1 metrics for from February '06 to February 2007 --

2 **A.** Yeah.

3 **Q.** -- for the service level agreements?

4 **A.** No, this is showing the number of calls in each of those
5 categories, so the number of calls was not the service
6 level agreement. The service level agreement was more
7 around average speed of answer. Number of calls that
8 went through to voicemail, for example, I believe those
9 are listed in one of the statement of work documents.

10 **Q.** If you could go to the bottom of this page, please, and
11 if we could make the table at the bottom just slightly
12 bigger -- thank you.

13 So we see the total calls, third up from the bottom,
14 and a monthly call limit.

15 **A.** Mm-hm.

16 **Q.** What was the monthly call limit?

17 **A.** I don't recall specifically. I could speculate that
18 that's the document -- that was a contractual level was
19 put into a document, so that if we -- if the number of
20 calls exceeded or significantly were less than this, it
21 would trigger a conversation with Post Office around the
22 volumetrics of the service desk and the cost of the
23 service. It's standard for IT to have those threshold
24 limits in there.

25 **Q.** We see that the calls range in February '06 is just over

26

1 **A.** Mm-hm.

2 **Q.** We then have "Level 1 calls resolved within 5 minutes",
3 95 per cent; do you recall what a level 1 call was?

4 **A.** I don't recall exactly what a level 1 call was, however
5 it was something that would be able to be resolved at
6 the Service Desk.

7 **Q.** The same for level 2, really. Do you recall the
8 difference between that and a level 2 call?

9 **A.** So, again, a level 2 call, again, I don't recall. So
10 that would be something that -- within the Service Desk,
11 there was a level 1 and a level 2 sort of level of
12 service. So level 2 probably had more time. They took
13 more time to see if they could resolve at first point of
14 contact. Obviously, it's much more advantageous for
15 post offices and for Fujitsu to resolve at the Service
16 Desk rather than pass to a second or third line support
17 team.

18 So seeing this now has triggered the memory in me
19 that there was a level 1 and level 2 Service Desk within
20 the Horizon Service Desk. I don't recall the difference
21 between a level 1 and level 2 call.

22 **Q.** So this is saying of level 1 calls, say, for example,
23 95 per cent should be resolved within five minutes and
24 for level 2 calls, those defined as level 2, 95 per cent
25 should be resolved within 30 minutes. Can you recall if

28

1 there were any targets or guidelines of the proportion
 2 of calls which come into the Helpdesk which should be
 3 level 1, which should be level 2 or which should be
 4 level 3?
 5 **A.** No, I've no recollection of that.
 6 **Q.** That document can come down, thank you. That monitors
 7 how the Helpdesk in terms of volumetrics responded. How
 8 was the quality of the Helpdesk advice actually given,
 9 how was that monitored?
 10 **A.** So there was -- I believe they were called service
 11 controllers or the team leaders would monitor and listen
 12 into calls. That was then given feedback specifically
 13 to agents. Again, I don't recall the percentage of
 14 calls that were listened in to but that was part of
 15 general Service Desk practice. There was also
 16 a complaints process. So when we received a complaint
 17 or the Horizon Service Desk would receive a complaint,
 18 that would then be logged and that would be investigated
 19 to determine if the complaint was a valid complaint or
 20 not.
 21 **Q.** Let's move to that assistance and how that was given.
 22 Can we bring up FUJ00079939. This is a "[Post Office
 23 Account] Customer Service Incident Management Process"
 24 definition, drafted on 23 March 2005. This is for what
 25 we've called Legacy Horizon, or what's known as Legacy

29

1 **Q.** Can we turn to page 12, please. So we have a flowchart
 2 here showing at the top, entry ways into the contact
 3 received by the POA Service Desk. "SDU", is that
 4 Service Delivery Unit?
 5 **A.** Correct, yeah.
 6 **Q.** In lay terms, what would a Service Delivery Unit be?
 7 **A.** So the software support, the SSC was a Service Delivery
 8 Unit. So it was a team, a resolving unit, if you like,
 9 a resolving team that would work to resolve incidents.
 10 **Q.** So a team within Fujitsu such as the SSC or the --
 11 **A.** Yes, or engineering, yeah.
 12 **Q.** There's then "User", which is presumably the
 13 subpostmaster?
 14 **A.** Mm-hm.
 15 **Q.** "System" and "Service Management". Do you know what
 16 those are?
 17 **A.** So we could have system driven alerts that would come up
 18 in. From my recollection they would come from the data
 19 centres, if there were any system alerts that could
 20 trigger an incident being logged at the Service Desk,
 21 and service management would be myself, my team and the
 22 wider service delivery organisation. Users would also
 23 be Post Office Limited, as well, so not just necessarily
 24 just subpostmasters, just for clarification.
 25 **Q.** No, and we don't need to go through all of this

31

1 Horizon, the version of Horizon in place from national
 2 rollout until 2010.
 3 **A.** Mm-hm.
 4 **Q.** You drafted the Horizon Online version of this document;
 5 is that right?
 6 **A.** Yeah, that's correct.
 7 **Q.** But this is the document that you would have been
 8 working with or would have been used at the time that
 9 you were in post?
 10 **A.** Yeah, this was drafted just before I joined but, yes,
 11 this is the process that we would have been working to.
 12 **Q.** If we could turn to page 8, please. The "Process
 13 Objective", under 1.2 says:
 14 "The objective of this document is to define the
 15 process for Incident Management of the POA environment.
 16 For the purpose of this document an Incident is defined
 17 as:
 18 "Any event which is not part of the standard
 19 operation of a service and which causes, or may cause,
 20 an interruption to, or a reduction in, the quality of
 21 that service'."
 22 So if a subpostmaster called the Helpdesk with
 23 a possible software problem, that's an incident to be
 24 managed under this process; is that right?
 25 **A.** That's correct, yes.

30

1 flowchart. It starts with trying to triage the query,
 2 basically. At the bottom we see, if we just move down
 3 slightly, four types of outcome. There's "Incident",
 4 which then follows this process in this document;
 5 "Advise & Guidance, Answer enquiry and close or refer to
 6 ... NBSC"; "Out of Scope", that's where -- it wasn't
 7 within the scope of the services provided by Fujitsu?
 8 **A.** Correct.
 9 **Q.** And "Quality".
 10 **A.** Mm-hm.
 11 **Q.** Is "Quality" looking at the quality of service provided
 12 by the Helpdesk rather than the quality of the Horizon
 13 System?
 14 **A.** From my understanding of the document, yes.
 15 **Q.** On the helpdesk, how would the -- what process was used
 16 or guidance was used for allow a Helpdesk operator to
 17 decide whether it's an incident or something that needs
 18 to go to the NBSC?
 19 **A.** So the service desk would have had call scripts that
 20 they would go through and that would help them then
 21 determine which of these four categories the incident
 22 would be logged -- or not necessarily the incident,
 23 which of the four categories would be applicable in this
 24 process.
 25 **Q.** I'm just going to move forward, actually, because you've

32

1 mentioned call scripts now and I think in your statement
2 you say that the agents were provided with scripts,
3 pre-defined questions, which they were expected to use
4 when providing support to the SPM.

5 Do you recall who was responsible for drafting those
6 scripts?

7 **A.** The Service Desk team would have been responsible for
8 drafting those scripts, however they would have had
9 input from the Service Delivery Units or from service
10 delivery management as well.

11 **Q.** Where were they held for the operators to access?

12 **A.** I don't know where they were held. I don't know where
13 that documentation was held. I don't recall if it was
14 actually part of the PowerHelp tool set. In some
15 service management tool sets, the script is actually in
16 the software, so it prompts the agent what to say. But,
17 in this instance, I don't recall where it was held.

18 **Q.** Do you recall if there was a general script to follow
19 for all calls or if there were individual scripts for
20 specific issues raised by subpostmasters?

21 **A.** Again, I wasn't actively involved in the day-to-day
22 operation of the desk. My recollection is that there
23 was a script that initiated the conversation, you know,
24 greeting the caller, getting the Post Office branch
25 ID -- again, I can't remember the correct terminology

33

1 live calls.

2 **Q.** Are you aware if this document was converted into a more
3 precise script that would then be used by the Helpdesk?

4 **A.** I am not personally aware but it would be my speculation
5 that it was. This is, you know ...

6 **Q.** Please could we bring up now FUJ00138733. I think this
7 was a document you were given this morning.

8 **A.** Mm-hm.

9 **Q.** It's:

10 "PROCESS -- ID:408501 -- Engineer Refused Access
11 Process.

12 "Summary:

13 "Please use this KA ..."

14 Do you know what "KA" stands for?

15 **A.** I don't know, no. Knowledge article, perhaps I would
16 hazard a guess at.

17 **Q.** Knowledge article. That's what I was about to suggest.

18 **A.** Yeah.

19 **Q.** But:

20 "... if an engineer has called to advise they have
21 been refused access at a post office.

22 "Resolution:

23 "If an engineer has called to advise that they have
24 been refused access at a post office, please follow the
25 below:

35

1 for that -- and then obviously trying to capture
2 specific information. I think one of the documentations
3 has that in there, one of the joint working documents
4 actually lists out some of the scripts that needs to be
5 said.

6 **Q.** I may have the document in my mind, which you're
7 referring to. Shall we bring up FUJ00080478. This is
8 a Horizon Service Desk joint working document, and we
9 see at the bottom the -- you were an author on this with
10 John Casey.

11 **A.** Yes, so John was one of the service desk managers
12 reporting into Paul Gardner.

13 **Q.** Please can we turn to page 13. This section looks at
14 the end-to-end incident management and if we go down
15 slightly, under 4.4.1, the third paragraph down, it
16 says:

17 "The moment an Agent receives an incoming telephone
18 call, they will greet the customer with the example
19 shown below. All spoken words are marked in Italics and
20 'quotes'.

21 "*Good Morning/Afternoon/Evening. Horizon System
22 Helpdesk [AGENT NAME] speaking.*

23 "*May I take your Branch code please?*"

24 **A.** Yes, and this would have been part of the training that
25 was given to the Service Desk agent before they took

34

1 "Frontline Process ..."

2 Then 2 says:

3 "HSD contacts site and follows call script below in
4 purple."

5 We don't then need to read it out but there is then
6 a call script there for a specific incident, in this
7 case engineer refused access process. Do you recall
8 seeing items like this during your time working with
9 Fujitsu?

10 **A.** No, I don't recall seeing this. Again, I can speculate
11 that this is the knowledge article that the Service Desk
12 had, that would -- they would refer to this in the event
13 that they received a phone call from an engineer saying
14 they didn't have access to the site.

15 **Q.** Would you anticipate that there would be similar
16 articles for -- this is obviously engineer refused
17 access but say a subpostmaster rang with a discrepancy
18 would you expect there to be scripts of a similar nature
19 advising the operator how to deal with that?

20 **A.** It would be my expectation, yes.

21 **Q.** That document can come down. Thank you.

22 Do you recall ever an instruction being given to
23 helpdesk staff to tell subpostmasters that they were the
24 only person experiencing a problem that they had
25 reported?

36

1 A. No.

2 Q. Would you expect -- what would you say if such advice
3 was given?

4 A. I would say that would be erroneous advice.

5 Q. If we could please bring back up FUJ00079939. If we
6 could go to page 15, please, paragraph 2.4. This sets
7 out, I think it's fair to say, what the Service Desk was
8 expected to do when handling calls or incidents and, for
9 the record, it says:

10 "The Service Desk agent then attempts to resolve the
11 Incident using the resources available. This starts by
12 interrogating HSH ONE ..."

13 Do you recall what that was?

14 A. I don't recall. Again, I can speculate that that was
15 the term given to the system that housed the KELs or it
16 was a precursor to the knowledge database. That's
17 a terminology that I don't recall.

18 Q. "... to find all information related to the Incident
19 symptoms. If the Incident is routine, ie there is
20 a pre-determined route for resolution, then the Incident
21 is referred to the relevant SDU using the Service Desk
22 Support Matrix in HSH ONE."

23 When you say "SDU", that would be perhaps the SMC or
24 engineering?

25 A. Or engineering, yeah.

37

1 Q. Who would look into the software calls?

2 A. The SSC would be my assumption.

3 Q. So let me look -- put this a different way. When
4 examining whether a software -- a number of software
5 calls had been resolved quickly enough and within
6 service level targets, would you ever have looked into
7 whether the KEL database was an effective way or was
8 effective in giving Horizon Service Helpdesk operators
9 information they needed to resolve level 1 and level 2
10 calls?

11 A. The only metrics that I'd have looked into were the
12 level 1, level 2 within the Horizon Service Desk. So
13 the -- I don't know what the resolution timescales or
14 the SLAs were expected to be for the Service Delivery
15 Units that were not part of my portfolio. So I don't
16 know what the SSC SLA was or what it was intended to be.
17 But going to the question, looking at level 1, level 2
18 within the Horizon Service Desk, if we saw deterioration
19 or that service level metric wasn't being met we would
20 look to try to understand what was the root cause of
21 that.

22 MR STEVENS: Sir, I don't have much longer to go but, for
23 the transcriber, I notice we've been an hour, so
24 I wonder if we could have a short break?

25 SIR WYN WILLIAMS: Yes, by all means. Where are we now?

39

1 Q. It then goes on to say:

2 "If the Incident is not routine, the Service Desk
3 agent checks for Known Errors listed in HSH ONE and the
4 SSC KEL against records relating to the Incident
5 symptoms. If a match is found, the agent informs the
6 caller of the workaround or resolution available and
7 links the call to the master Incident record."

8 A. Mm-hm.

9 Q. Do you recall the KEL database?

10 A. Not in detail, I recall its existence.

11 Q. Do you recall whether members of the helpdesk found that
12 an easy system to use?

13 A. I wouldn't be able to comment on that. I don't know.

14 Q. During your time analysing the call metrics, et cetera,
15 would you have needed to consider, for example, if there
16 was an increase in delays in resolving calls within
17 10 minutes or 30 minutes, would that be something you
18 would look into, the reasons for the delay, sorry?

19 A. Yeah, for the level 1, level 2 on the Service Desk. So
20 anything that got routed to a Service Delivery Unit, the
21 only one that I would have had any involvement in is the
22 engineering service and anything that was rooted to
23 Cable & Wireless or BT for the online branch services --
24 it wasn't Internet -- ADSL as it was at the time, but
25 I wouldn't look into any of the software calls.

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1 11.30 all right?

2 MR STEVENS: Yes, that's fine, thank you, sir.

3 SIR WYN WILLIAMS: Good, see you then.

4 MR STEVENS: Thank you.

5 (11.13 am)

6 (A short break)

7 (11.30 am)

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

9 SIR WYN WILLIAMS: Yes, I can, thank you.

10 MR STEVENS: I want to go back to the document we were on
11 and at the same place, please. It's FUJ00079939. And
12 paragraph 2.4 -- sorry, 2.5. We went to this paragraph
13 beforehand and this is where the Service Desk operator
14 couldn't resolve the problem of using HSH One --

15 A. Mm-hm.

16 Q. -- and then checked for known errors listed in the same
17 database but also in the SSC KEL database that we
18 discussed?

19 A. Yeah.

20 Q. It said:

21 "If a match is found ..."

22 So presumably if it matches to something in the One
23 system or in the SSC KEL system:

24 "... the agent informs the caller of the workaround
25 or resolution available and links the call to the master

40

1 Incident record."

2 **A.** Mm-hm.

3 **Q.** Can you just explain what the master incident record was

4 in that case?

5 **A.** So it's common practice in the Service Desk to create

6 a master incident record and then append what we call

7 child incidents to that master record. That then allows

8 any Service Desk or, in this case, the Post Office

9 Service Desk, to be able to capture the metrics on how

10 many occurrences of that incident there actually were,

11 if that makes sense. So it's a mechanism of saying we

12 have this major incident, and then there's appended

13 other incidents beneath that.

14 **Q.** So for instance with Callendar Square -- I'm not saying

15 this is what happened but to use it as an example, there

16 may be a master bug or incident and then each time one

17 is identified in the field, in theory, that should be

18 appended to that incident as a child?

19 **A.** That's the theory, yes.

20 **Q.** Is that different to the KEL, so would the KEL be

21 updated to show that the call had been raised and was

22 linked to the overall KEL?

23 **A.** There would be a cross-reference between the KEL number

24 and the number of incidents. So, again, this is my

25 assumption, that the master incident record would refer

41

1 Database, the Service Desk continues with first line

2 resolution of the Incident assisted by the Product

3 Support Engineers ..."

4 Who were the product support engineers?

5 **A.** I don't recall who the product support engineers were in

6 this particular instance. Again, I could speculate that

7 they are subject matter experts associated with the

8 particular software or hardware but I don't recall

9 specifically who the PSEs were in this particular

10 instance. As it's articulated here, it appears that

11 they're part of the Service Desk.

12 **Q.** So and then 2.8:

13 "If the PSEs cannot resolve the Incident, it is

14 referred to the relevant SDU using the Service Desk

15 Support Matrix in HSH ONE."

16 **A.** Yes.

17 **Q.** So is my understanding right that this, you follow this

18 process and then if this doesn't lead to a resolution,

19 it's then passed to second line support?

20 **A.** So what would happen is, if an incident is logged -- and

21 this is sort of generic service management best

22 practice -- if an incident is logged, it's then

23 validated to see if there's a known solution, a known

24 workaround to get the service restored. That's the KEL

25 that would be looked in. The KEL contained -- or the

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1 to the KEL and, therefore, you would be able to

2 extrapolate that KEL12345 had X number of incidents

3 associated with it.

4 **Q.** So, in this case, if there was a second incident of

5 a similar or the same materialisation of a bug, we had

6 the child. You think that the -- there's a link to the

7 actual KEL, so on the KEL you can see incidents linked

8 to it. Are you aware if that ever changed?

9 **A.** So just to clarify, I'm not sure that the KEL would show

10 the number of incidents but you could cross-reference

11 the two data sources to achieve the same outcome, so

12 just for clarity -- and sorry, what was the second

13 question?

14 **Q.** That system that you've just referred to, are you aware

15 if that ever changed during your time at Fujitsu?

16 **A.** I don't believe so, no.

17 **Q.** Thank you. Can we turn to page 16, please, and

18 paragraph 2.6:

19 "If there is no match in HSH ONE or the SSC KEL, the

20 Problem Database is checked for current incidents

21 outstanding. If a match is made, the caller is then

22 advised of the status of the Problem and the call is

23 then linked to the master Incident record given in the

24 problem details.

25 "2.7. If no match is made against the Problem

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1 knowledge database contains how to resolve an incident,

2 how to restore that incident.

3 The problem database would be open items for which

4 the resolution hasn't yet been identified. So problem

5 management is one level elevated to incident management

6 and then the product support engineers, reading this

7 now, they are subject matter experts in the Service Desk

8 and if they are unable to resolve, that's then when it

9 would get that then passed through to the Service

10 Delivery Unit, should that answer your question or not.

11 **Q.** I suppose my question is that's when it goes to second

12 line?

13 **A.** Mm-hm, yeah.

14 **Q.** So the Helpdesk -- in your experience, did the Helpdesk

15 follow this as a matter of course, in practice, this

16 system?

17 **A.** Yes, yeah, absolutely. That would be the system that

18 they followed. I can't say that they followed it

19 100 per cent of the time because there are humans

20 involved in this but that was absolutely the intent: to

21 check the KEL, to see if there was a resolution and then

22 to check the problem database and, if it was unable to

23 resolve, to assign it through to the SDU. The KEL might

24 actually stipulate in it "You need to pass it to the

25 Service Delivery Unit", so that could also be some of

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1 the information that's in the KEL.

2 **Q.** Your evidence earlier when we discussed the log and flog
3 matter, you discussed how there weren't many first line
4 fixes available.

5 **A.** Mm-hm.

6 **Q.** When we explored that, you referred to the number of
7 hardware issues --

8 **A.** Yes.

9 **Q.** -- and we saw the number of calls that came in to do
10 with hardware, so those calls would be, of course,
11 passed straight on to the engineering department or
12 whatever it is.

13 **A.** Yes.

14 **Q.** Limiting it to software complaints, was there still a
15 limited number of first line fix available to the
16 Helpdesk when this process was followed?

17 **A.** It's my belief that, yes, there would still only be
18 a limited number of fixes that the Service Desk would be
19 able to do.

20 **Q.** Do you know why that was?

21 **A.** Again, I -- my speculation is that they didn't have any
22 ability to resolve software incidents and they had to go
23 to the specialised teams. It's very few service desks
24 that are able to resolve software issues. Mostly it's
25 a reboot to see if that solves it but that's why it's my

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1 those were passed through to either the service
2 management team or managed in accordance with the
3 incident management process -- the major incident
4 management process.

5 **Q.** So this document is looking at what is described as
6 obligations for first and second line support
7 collectively to third line support?

8 **A.** Mm-hm.

9 **Q.** Subparagraph (d), it says:

10 "To 'filter' all calls for which the problem is
11 already known to the support community and for which
12 a resolution is already known or has been generated. In
13 this context the term 'resolution' can take a number of
14 forms, including.

15 "The statement that the problem is resolved in
16 release [X] of the Horizon solution.

17 "There is a documented workaround for the problem.

18 "The documentation relating to that part of the
19 system is under review or being changed.

20 "No calls passed to the SSC which are subsequently
21 resolved as known errors, except in cases where the
22 symptoms as reported by the customer did not match the
23 symptoms recorded in the known error documentation, and
24 which therefore the HSH/HIT/SMC could not reasonably
25 have been expected to find."

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1 belief that there was very limited first-level fix that
2 the Service Desk could do in software incidents.

3 **Q.** Were the types of software incidents that were being
4 presented to the Helpdesk more complex than you would
5 expect in other IT projects?

6 **A.** I'm unable to comment on that. Again, the information
7 I saw was the breakdown of the number of tickets logged
8 against specific PowerHelp codes.

9 **Q.** If we go to a different document, please. It's
10 FUJ00079897. It's a 2003 document, "End-to-End Support
11 Process, Operational Level Agreement".

12 **A.** Mm-hm.

13 **Q.** Please can we turn to page 6. This sets out
14 "HSH/HIT/SMC obligations to SSC". I think we've covered
15 all of those abbreviations, save for "HIT". Do you
16 remember what that was?

17 **A.** Well, according to the abbreviation definition in the
18 document it's the Horizon Service Desk Incident Team.

19 **Q.** Do you recall what their role was?

20 **A.** There was a subsection within the Service Desk -- the
21 Service Desk have -- it's not just agents that have
22 responded to calls. You also have team managers, PSEs,
23 as I now remember, and incident management teams. And
24 the incident management teams would look at major
25 incidents or significant incidents and make sure that

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1 So this is essentially putting into practice what
2 you described earlier, that, where possible, first and
3 second line support should resolve the calls where they
4 can do?

5 **A.** Mm-hm.

6 **Q.** Are you aware if there was any consequences of or what
7 happened when the SSC considered that a call had been
8 directed up to them inappropriately?

9 **A.** Um, they -- my recollection is that they would refer
10 that back and we would try and have a closed loop
11 process to understand why a call had been passed to SMC
12 which -- or SSC, sorry, which shouldn't have actually
13 been passed there, because the intent is always to try
14 to resolve as quickly as possible. So that's a failure
15 in the process, if something has gone through to a third
16 line support team, which should have been resolved or
17 could have been resolved by a level 1 or a level 2 desk.

18 **Q.** To what extent was there pressure on people in the
19 Helpdesk to resolve calls themselves rather than refer
20 them up?

21 **A.** Um, again, I wasn't actively on the -- involved in the
22 day-to-day operation on the Service Desk. There was,
23 you know, there was a requirement for them to follow the
24 process correctly but I wouldn't say that there was
25 pressure on them to not pass calls through to second or

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1 third line. You know, there was no metrics on that and
 2 the desk was operating on its -- on the metrics that we
 3 discussed in the previous documentation. So I don't
 4 believe there was undue pressure or any pressure for
 5 them to not refer calls inappropriately.

6 **Q.** Can we turn to page -- I think it's just over the page,
 7 subparagraph (m). Just further down, please. We have
 8 (m), which is:
 9 "To 'filter' all user error calls and ensure that
 10 they are closed.
 11 "No calls passed to SSC which are subsequently
 12 closed as 'user error'."
 13 Then (o):
 14 "To 'filter' all calls for which the Pathway
 15 software [it says 'in' but 'is'] not at fault.
 16 "No calls passed to SSC which are subsequently
 17 closed as 'No fault in product'."
 18 From the Helpdesk perspective, do you think the
 19 people working on there had sufficient expertise to be
 20 able to determine whether a call was -- or an incident
 21 was caused by user error, rather than the software
 22 itself?

23 **A.** The intent of the knowledge articles is to provide the
 24 knowledge to the Service Desk agent, so that they should
 25 follow the script that's in the knowledge article and
 49

1 looked away as all Asians were called Patels, regardless
 2 of surname. Shouts across the floor could be heard
 3 saying 'I have another Patel scamming again'. They
 4 mistrusted every Asian Postmaster. They mocked Scottish
 5 and Welsh postmasters and pretended they could not
 6 understand them. They created a picture of postmasters
 7 that suggested they were incompetent or fraudsters."
 8 Were you aware of any such behaviour on the Helpdesk
 9 during your time at Fujitsu?

10 **A.** No, not at all. And reading that, I find that
 11 absolutely appalling.

12 **MR STEVENS:** I have no further questions, but before I ask
 13 if the Core Participants have questions, is there
 14 anything further you would like to say to the Inquiry?

15 **A.** No, that's fine. Thank you.

16 **MR STEVENS:** Yes, Mr Stein has some questions, sir.
 17 **Questioned by MR STEIN**

18 **MR STEIN:** Sir, one area of questioning, it won't take long.
 19 Ms Evans-Jones, I represent a very large number of
 20 subpostmasters and mistresses, all of them have been
 21 affected by this scandal. Dealing with your knowledge
 22 of the support systems, can you help me whether the
 23 first line support groups used the same incident logging
 24 system as the rest of the support chain?

25 **A.** Um --

1 that would then determine whether it was -- how to route
 2 the call. The intent of knowledge articles is to
 3 eliminate that need for in-depth knowledge for Service
 4 Desk agents. So I don't believe, if the knowledge
 5 article was written correctly, then they should have
 6 been able to follow that and that would have then
 7 delivered the right -- the correct outcome.

8 **Q.** That document can come down. Thank you.
 9 I've been asked to ask you if whether, to your
 10 knowledge, there were members of the helpdesk who were
 11 ever advised to tell subpostmasters to accept
 12 discrepancies because they were caused by user error.

13 **A.** Absolutely not to my knowledge did that happen.

14 **Q.** Finally, please could we bring up statement
 15 WITN06660100. This is a witness statement from Amandeep
 16 Singh, who will be giving evidence to the Inquiry later
 17 today and worked at the Helpdesk before your time at
 18 Fujitsu in 2001, in Wakefield. Can I ask you to turn to
 19 page 3, please, of the statement. I'll just read it for
 20 the record. It says:
 21 "The floor on these days ..."
 22 When it says "these days", it is referring to
 23 Wednesday when there was balancing issues:
 24 "The floor on these days was most toxic with vocal
 25 characters in Squad A, unchallenged by managers who
 50

1 **Q.** Now, first of all, do you want me to repeat the
 2 question?

3 **A.** Can you define "support chain"? Are we talking SDUs?

4 **Q.** Yes, well, I am quoting, in fact, from a document. It
 5 is the document after your time, relating to these
 6 matters. So what I'm trying to find out is whether the
 7 original Horizon System had the same problem. So all
 8 I've got is that the first line support groups -- so
 9 I imagine are the helpline support providers. So if we
 10 look at it from that perspective, did they, in your
 11 time, use the same incident logging system as the rest
 12 of the support chain, which would then be the lines 2, 3
 13 and 4?

14 **A.** To the best of my knowledge, the Service Desk used
 15 PowerHelp initially. That then changed to TRIOLE for
 16 Services. PowerHelp, from an engineering perspective,
 17 was not the system used by the engineering and it
 18 transferred into a Core Services tool set that managed
 19 the engineering and, to the best of my recollection, SSC
 20 from the software perspective, had access to the
 21 PowerHelp that they transferred it into their own tool
 22 or that they worked on.

23 **Q.** So is the answer to my question that they didn't, in
 24 fact, use --

25 **A.** To the best of my knowledge, I think different systems

1 were used.

2 **MR STEIN:** Yes. Thank you.

3 **SIR WYN WILLIAMS:** Anyone else?

4 **MS PAGE:** I do have some questions, please, sir.

5 **SIR WYN WILLIAMS:** Yes.

6 **Questioned by MS PAGE**

7 **MS PAGE:** It's Flora Page, also representing a number of

8 subpostmasters. Can I ask, please, for document

9 FUJ00120049 to come up, please, and if we can go to

10 page 6. If we can go to the definition of --

11 I understand this to be something which would deal with

12 problems which then go into what you've described as the

13 problem database; is that right?

14 **A.** Yeah, yeah. So for clarity, a problem is an issue that
15 doesn't have a documented workaround or resolution, so
16 an incident, and then you move into problem management,
17 and then change management addresses the root cause
18 that's in the problem, the kind of three flow through to
19 each other.

20 **Q.** Well, as I understand it from this document, the
21 relationship between an incident, which we've already
22 seen the definition of, and a problem, is that the
23 problem is defined as -- let's see if I can find it,
24 it's that second sentence of the first paragraph there:

25 "For the purpose of this document a Problem [with

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1 incidents, then. The incident, we saw earlier, was
2 defined as "any event which is not part of the standard
3 operation of a service and which causes or may cause
4 an interruption to or a reduction in", yes?

5 **A.** Yes.

6 **Q.** All right. Can I just have look at how that translates
7 into -- falls into the system. If we could bring up,
8 please, POL00073280. If we go to page 5. Now, page 5
9 shows us what seems to be a typical record of a call in
10 to the Helpdesk; is that right?

11 **A.** Yes, that's what it appears to be, yes.

12 **Q.** Presumably this is the sort of output of the PowerHelp
13 tool; is that right?

14 **A.** Yeah, this is from PowerHelp, correct.

15 **Q.** In this particular incident, we see that it's a call in
16 on 28 January '04, we see that in the middle of the top.

17 **A.** Mm-hm.

18 **Q.** We can see there's a box called "Problem Text" about
19 halfway down, a little bit below halfway down, and this
20 is a summary of what the caller says:

21 "Caller states that discrepancies are going through
22 on the system. And this has been the case for 3 weeks
23 in a row."

24 Then it gives the amounts for the discrepancies.

25 Then we also see a little below that, two lines below

55

1 a capital P] is defined as the unknown underlying root
2 cause of one or more Incidents."

3 **A.** Mm-hm.

4 **Q.** Then I think further down, it tells us -- and if you can
5 confirm it from memory, we maybe don't need to -- it was
6 three or four incidents which created a problem?

7 **A.** I don't think there's a specified amount of incidents
8 that would create a problem. So you could actually have
9 a problem -- this is, again, the academic theory of
10 service management. If -- any incident that you do not
11 have a resolution for or a workaround that would restore
12 service could trigger the raising of a problem, and then
13 that problem then should be investigated as to what the
14 root cause is and then that root cause should be removed
15 from the infrastructure through the change management
16 process.

17 **Q.** But in this document -- and perhaps we can scroll down
18 to see if we can find it -- I think it's right to say it
19 was, in fact, three or four incidents which were defined
20 as becoming a problem?

21 **A.** I don't know, I can't see that in the document. The
22 theory is that any one incident can generate a problem
23 and perhaps in this document it stipulates two or three.
24 I feel -- I don't see on here where it says that.

25 **Q.** All right, then let's just stick with one or more

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1 that, a text after the call has been closed and this
2 appears to be a sort of summary of why the call is
3 closed.

4 **A.** Mm-hm.

5 **Q.** It says:

6 "Call Close by Diane Meah: NBSC issue, transferred
7 for investigation."

8 So that presumably is a typical closure if the
9 caller has been referred to the NBSC?

10 **A.** That's my understanding from the text that's written on
11 here, yes.

12 **Q.** Is it right also that we would -- we then can see below
13 that, "Non-horizon Business" as the product and the
14 description, and presumably that feeds in, again, then,
15 to your metrics, does it, for how the call has been
16 resolved?

17 **A.** Yeah, if you refer back to the table with the graphs,
18 one of those blocks would be related to -- calls
19 classified as non-core or referred to -- I don't know
20 what the terminology is, whether they're referred to
21 NBSC or whether it's non-Horizon business. So it would
22 fall in one of those blocks on that graph that we saw.

23 **Q.** I think you told us, didn't you, that, from memory, you
24 didn't particularly remember discrepancies being their
25 own type of resolution?

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1 A. Yes. No.
 2 Q. But we see here an example of how a call about
 3 discrepancies, is resolved as non-Horizon business, yes?
 4 A. Yes, that's what this is showing.
 5 Q. We don't necessarily need to go to them but there are
 6 then, following this call, from the same office, which
 7 is Marine Drive, it's a particular office which
 8 obviously this Inquiry is going to hear a little about,
 9 there are then a number of calls about discrepancies,
 10 which are all basically resolved by being referred to
 11 the NBSC.

12 So that is an example, is it not, of how calls about
 13 discrepancies would never turn into or, in this case,
 14 don't appear to have ever turned into "incidents" or
 15 "problems"?

16 A. In this particular incident, yes. This wouldn't have
 17 been investigated by Fujitsu. However, the comment on
 18 the bottom of the screen that I can see there is that
 19 the NBSC would then be able to refer that back to
 20 Fujitsu following their investigation. If you recall
 21 the incident flow, one of the inputs at the top would be
 22 from users or from the NBSC. So this could have been
 23 referred back into Fujitsu through -- and I don't know
 24 if it did but this could have been referred back through
 25 to Fujitsu from Post Office Account through the

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1 break for the next witness.

2 **SIR WYN WILLIAMS:** Yes, certainly. What is that, sorry?

3 **MR STEVENS:** 12.10, if we may, sir.

4 **SIR WYN WILLIAMS:** Yes, fine.

5 **MR STEVENS:** Thank you.

6 (11.57 am)

7 (A short break)

8 (12.10 pm)

9 **MS KENNEDY:** Good afternoon, Chair.

10 **SIR WYN WILLIAMS:** Good afternoon.

11 **MS KENNEDY:** May I call Mr Amandeep Singh, please.

12 **AMANDEEP SINGH (affirmed)**

13 **Questioned by MS KENNEDY**

14 **MS KENNEDY:** Mr Singh, as you know, my name is Ruth Kennedy
 15 and I ask questions on behalf of the Inquiry. Could you
 16 confirm your full name, please?

17 A. My name is Amandeep Singh.

18 Q. You've given a witness statement to the Inquiry. If we
 19 could turn that up it's WITN06660100. Have you got that
 20 witness statement in front of you?

21 A. I do, yeah.

22 Q. If you turn to page 3. Is that your signature there?

23 A. Yes, it is.

24 Q. It should be dated 13 January 2023; is that right?

25 A. That's right.

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1 processes and the engagement that we --

2 Q. Yes, I understand. It's right. We can indeed see that
 3 there is a bit of back and forth between NBSC and the
 4 Horizon Helpdesk but, absent it being escalated from the
 5 Horizon Helpdesk, it can't become an incident or
 6 a problem?

7 A. Or have been escalated through NBSC through Post Office
 8 into Fujitsu, yes. That's --

9 Q. Yes, I see. So NBSC could escalate it straight up the
 10 line, could they?

11 A. Yes.

12 **MS PAGE:** All right. Thank you, those are my questions.

13 A. You're welcome.

14 **MR STEVENS:** Sir, I think that's all of the questions from
 15 the Core Participants.

16 **SIR WYN WILLIAMS:** Well, thank you very much for coming to
 17 give evidence at the Inquiry and for providing a written
 18 witness statement. I understand you may have travelled
 19 from mainland Europe to give your evidence.

20 **THE WITNESS:** I did indeed, yes.

21 **SIR WYN WILLIAMS:** Yes, if that's been inconvenient for you,
 22 I'm sorry. But I hope you'll combine it with something
 23 which gives you some pleasure. So thank you very much.

24 **THE WITNESS:** Thank you very much, appreciate that.

25 **MR STEVENS:** Thank you, sir. If we may have a 10-minute

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1 Q. Have you read through this statement recently?

2 A. Yes, I have, yes.

3 Q. Is it true to the best of your knowledge and belief?

4 A. It is, yes.

5 Q. If we could turn to paragraph 1 of that statement, so
 6 scrolling down. You said you worked on the Horizon
 7 Helpdesk support desk at Wakefield between September
 8 October 2000 and September 2001; is that right?

9 A. That's correct.

10 Q. What was your background prior to getting that job?

11 A. So the background to the -- me getting the job was it
 12 was my industrial year from university. I was studying
 13 computing at Huddersfield University, and we had to
 14 obtain a graduate work placement year, so the university
 15 found a placement for me. I wanted to do something that
 16 was a bit more hands on than what they initially found,
 17 so I found a role with ICL which was going to be
 18 supporting Epson Printers and I chose to take that role.

19 Q. So was this your first job?

20 A. This was my first ever full-time role, if you like,
 21 yeah. I had worked part-time prior.

22 Q. When you joined, how many people were part of the
 23 Horizon Helpdesk support desk?

24 A. Sorry, just to backtrack, I joined the Epson Helpdesk
 25 initially and, at some point during the year, it merged

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1 to become that -- I think ICL and Fujitsu had some type
2 of merger, and then it became -- we were all transferred
3 to the Horizon Helpdesk. Roughly, I think, there was
4 maybe six to eight teams and each team had about maybe
5 12 -- 10 to 12 members.

6 **Q.** Are those the squads that you were referring to in
7 paragraph 2?

8 **A.** Squads, yeah.

9 **Q.** How many squads did you say there were?

10 **A.** I think it may be six to eight. I'm trying to really
11 rack my brains. Between about six to eight.

12 **Q.** What did your role involve when you joined the Epson
13 support desk?

14 **A.** So my role was initially as a first line support
15 engineer. We would support all Epson printer products
16 that weren't related -- Mac related, if you like.

17 **Q.** How did that change when it move to the Horizon
18 Helpdesk?

19 **A.** So the role initially was supporting maybe technical
20 people, and -- so you'd get people in from
21 organisations, people calling in or even just generally
22 IT savvy individuals, if you like, that had issues with
23 their printer, and we would just talk them through it.
24 Sometimes there would be drivers issues or printer
25 driver -- we'd navigate them through software, how

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1 postmasters in the full array of tasks that Horizon was
2 set up for."

3 **A.** Yes, I think initially it was useful because we hadn't
4 seen the software. When you're on a phone call, you
5 have to visualise what the postmaster is visualising,
6 and what the -- the transaction that they're trying to
7 do. But we were just given routine transactions.
8 I think we did one time where we had to do the
9 reconciliation task. I think we had -- off memory,
10 I think we did it once. But generally, it was how we
11 would go about doing certain transactions and that was
12 it. But we didn't really know what the calls would be
13 until we got on the call because this is really the real
14 inception of the Helpdesk itself.

15 So until the calls started coming through we didn't
16 really know what level of support we would be providing
17 postmasters, and the postmasters themselves quickly
18 picked up how to do the transactions. It wasn't
19 something they were going to struggle with but that's
20 the level of support that we would get, I think. Where
21 it was insufficient was it was the more complex
22 transactions. I think they had foreign currency
23 exchanges and how they put cheques through a system, and
24 there was things that we didn't come across originally.

25 So, again, it was learning on the job, and a lot of

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1 they'd install drivers. If we couldn't then resolve
2 their issues we'd then pass them on to a second line
3 team and they would -- again, they would -- kind of more
4 specialist and a bit more -- maybe more technically able
5 than what we were in the first line team. I'm sorry,
6 the question of how it --

7 **Q.** What training did you receive when you moved over to the
8 Horizon Helpdesk?

9 **A.** So we were all told we were going to be moving to the
10 Horizon Helpdesk. Initially, it was something that we
11 weren't aware of what we would be doing. But we got,
12 I think it was on a few days training, we got to see the
13 equipment, run some dummy transactions. We were in
14 a room where we learned how to use the software. We
15 were given a booklet on the transactions, how to
16 navigate and to do things like selling a stamp, for
17 instance, or it was routine transactions that maybe
18 a postmaster would do. And that was the level of
19 training that we received. Roughly off the top of my
20 head, I think, I got two or three days training.

21 **Q.** You say in your statement, if we turn to paragraph 4, so
22 over the page, that you think it was insufficient. You
23 say:

24 "The support staff faced the initial challenge of
25 basic training that was insufficient to fully support

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1 it was just trying to remember, look at your booklets
2 and guiding a customer -- guiding the postmaster through
3 certain transactions, and it was generally at that
4 level.

5 That's what I meant by insufficient. It wasn't more
6 than just routine transactions, which is what the
7 Helpdesk training was really all about.

8 **Q.** How many calls were you fielding from subpostmasters?

9 **A.** It felt, initially at the start, we were sort of
10 inundated really, to be fair. So there were -- just
11 a constant stream of calls tend to come. They did used
12 to obviously peak on Wednesdays but it was a steady flow
13 of calls constantly.

14 **Q.** Why did they peak on Wednesday?

15 **A.** That was their reconciliation day, so that's when
16 postmasters would then do their -- if you like, they'd
17 balance the books, as such.

18 **Q.** Can you describe what that day was like, from your
19 perspective?

20 **A.** We would generally come in later because -- we had
21 different shifts, to be fair. So there'd be the normal
22 shifts that were covering -- they'd finish around 5.00
23 but you'd always have certain teams that would have to
24 stay longer because we kept the desk, as far as I can
25 remember, open for longer that day because you knew it

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1 was going to be a really heavy, heavy day. You could be
2 on a call with a postmaster for a few hours trying to
3 help them to reconcile, and that was very stressful
4 days.

5 **Q.** You say at paragraph 5 of your statement you'd gone from
6 dealing with IT savvy people, essentially, to people who
7 had never owned a machine before and weren't computer
8 literate; is that right?

9 **A.** Yeah, that's right. I mean, like I said, this was early
10 2000s. A lot of postmasters had worked in their -- you
11 know, in their branches for decades, in some cases, and
12 they'd never been around even a personal computer. So
13 it was not only introducing, you know, personal
14 computing into their lives, really, in some cases for
15 the first time, but it was then also giving them
16 exposure to "Here, now use this software". And some of
17 them wouldn't -- you'd have to explain to them what the
18 mouse was, in some cases.

19 I mean they wouldn't know what you meant by a mouse.
20 I mean, it's literally this is the age, the time we were
21 dealing with -- with certain people. Not everybody, but
22 a lot of postmasters were elderly. Some of them --
23 I mean, a lot of them weren't IT literate at all.
24 I mean, generally the public, you could say at that
25 time, not many of them were either.

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1 **Q.** At paragraph 6 of your statement, you say that the floor
2 was quite a toxic place. Could you tell us a bit about
3 more about what you mean by that?

4 **A.** Just to elaborate on the point that I've made about the
5 postmasters themselves. So, for me, this was my very
6 first IT role so I was -- dealing with people that were
7 ringing in and wanting the help on their printers were
8 generally people that tended to know about -- you know,
9 at the time it was Windows 95 or Windows 98 and you'd
10 "You can install a driver?" "Have you checked this?"
11 You know, how to run a clean cycle on a printer. All of
12 this terminology, in many cases, was just over the head
13 of a lot of post -- you know ...

14 And for me it was a learning curve because it was,
15 without being too crude, it was a job and I thought
16 "Well, I'm a uni student, I'm going to go back to uni,
17 I'm just going to see this out and see this is what the
18 world like". But it was toxic because the other members
19 of staff that were, if you like, the second line team,
20 the whole second line team had been abandoned and
21 everybody had just merged into this Horizon Helpdesk.

22 So there was a hierarchy of the second line team --
23 so we would never interact with, as first line engineers
24 on the Epson team, because we really, some of them, we
25 would hate having to put calls through to them because

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1 But -- and that brought its anxiety and stress to
2 postmasters themselves and as well as to us, because we
3 had to explain sometimes maybe a complex transaction,
4 but knowing that they themselves were not very literate
5 in terms of just orientating themselves around the
6 screen, trying to pick the right transactions, the right
7 icons, and you'd have to describe the icon on the screen
8 in detail. Go "Yes, press that. Now you're seeing
9 another screen". And so it was really -- trying to
10 guide them as much as you could, and that itself did
11 bring a level of stress because you were constantly
12 aware that other calls were coming through, there was
13 a backlog of calls, and you knew that that the call
14 started somewhere but it would end somewhere. And it
15 was trying to get them to that resolution point and
16 sometimes you would just feel a bit deflated in terms of
17 how can I get this person to that endpoint when they're
18 not really capable of sometimes getting there?

19 **Q.** What training, if any, did you receive in how to deal
20 with people of different computer literacies?

21 **A.** Nothing.

22 **Q.** Were there any particular types of problems that you
23 were asked to be ready for, or examples of issues that
24 subpostmasters may face that you were trained on?

25 **A.** No, not that I can recall.

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1 they would almost belittle you in some way when you
2 would pass a call to them. Like "Can you not deal with
3 this yourself?" There was a hierarchy of individuals,
4 to say we are really talented in engineers. They hated
5 us passing calls through to them.

6 So there was that dynamic where you didn't really
7 associate with those guys well. And then when they were
8 all brought in, everybody was equalised and on the same
9 level, that caused a great deal of animosity. And then
10 layer on top of that, you're now not supporting maybe
11 graphic design agencies or media companies as second
12 line engineers were doing, and now you're supporting,
13 you know, an old lady in Wales that doesn't know what
14 even a personal computer is.

15 It felt, I think a lot of them felt like the role
16 was beneath them, and that animosity, that toxicity, it
17 just grew and grew. And people were -- it became a bit
18 like people were almost on the calls and they were
19 almost shouting about "Oh my God, I've got this person
20 on a call", and this -- and it became almost comical to
21 watch people frustrated and throwing their arms about
22 and making a scene about supporting somebody who can't
23 do. And obviously they weren't projecting it to the
24 customer because it were going on mute, throwing their
25 arms up, "Oh look at this person, I can't believe I have

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1 got this, they don't know this, they don't know that",
2 and you'd get had a lot from the members of staff that
3 were, you know, the second line engineers, if you like.

4 And it just created an atmosphere that were just --
5 you didn't really want to be there. The people and the
6 teams didn't want to be there, and, like I said, it were
7 just going through -- for me, just going through the
8 motions of getting through each day.

9 **Q.** If we turn over the page, still in paragraph 6, you
10 mentioned some of the comments that you heard while you
11 were there. Do you want to tell us a bit about that?

12 **A.** Yeah, because I wanted -- the reason why I got in
13 contact with the Inquiry itself was because it felt
14 a little bit like -- I don't know how much that the --
15 it was going to be an inquiry about senior management or
16 maybe people looking away or people from top-down
17 dictating practices or something, and I wanted to just
18 give you my real-world experience of what it was like
19 just on the Helpdesk on the floor.

20 It wasn't like this Big Brother element of senior
21 management, just my opinions of day-to-day of what it
22 was like. And what I wanted to get across was you had
23 that element of where you had the teams merging into
24 one, supporting the postmasters, that resentment towards
25 the role, that they'd been now forced to take on. And

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1 even -- you know, you'd question it and say, "How can
2 you miscalculate 10,000 or 2,000?" It's not a couple of
3 stamps here or there. You can't reconcile to £20 or
4 £30. But these were huge figures that people were
5 quoting.

6 But -- and I think that's what I meant. Once that
7 story got about, once somebody said, "Oh, I've got
8 another Patel", and then you could just never get away
9 from that whole "Patel" thing. And it would be like who
10 could come up with the most outlandish story, "Oh, I've
11 got a Patel, got another Patel", you'd just hear it
12 constantly on the floor and me obviously being from
13 an Asian background, there was me and another gentleman
14 called Zubair we were the only two ethnic minorities on
15 the support desk at all, on the whole entire floor.
16 There was a Chinese gentleman or someone from a Chinese
17 background, Peter, and they were the only people of sort
18 of colour on that floor.

19 And at no point was anybody reeling it back and
20 saying, "What is this -- you know, the language that was
21 being used?" And my grievance with it was that it was
22 a case of why don't we just focus on the individual or
23 the actual -- this cultural dynamic, this mistrust, that
24 was just feeding through. It felt like some individuals
25 could never get beyond that, could never look beyond

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1 then you had another layer upon that, with the cultural
2 issues in some cases. Many of these people were
3 supporting -- Asian postmasters, not to put it in any
4 blunter terms than that, but sometimes an Asian
5 postmaster they would ring up and they'd be it like
6 "I've got a £2,000 discrepancy, I've got a £5,000
7 discrepancy", in some cases you'd get wild figures like
8 50,000 or 100,000 and sometimes these figures, people
9 were quoting were more than most of the salaries, annual
10 salaries of the individuals that they were supporting.

11 And if you like, so if you layer upon that, they're
12 doing a job they don't want to do, then someone rings up
13 and says £15,000 is missing from my account, and people
14 were like "Oh, here's another one calling".

15 And you'd get so many of these calls, not just from
16 Asian subpostmasters but from everywhere, all walks from
17 the UK, people would be calling in and they'd be saying
18 these figures and it's more than, you know, a monthly
19 salary, more than an annual salary of a lot of
20 individuals and they'd think "Where's this money gone?"
21 And it just build that mistrust.

22 And I think at the time, there was always stories in
23 the newspapers of somebody maybe frauding or defrauding
24 or doing something. And if somebody rings you up and
25 says £50,000 or £10,000 is missing, and you'd be like --

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1 that and try and do the role they were instructed to do.

2 And this is one of the prime reasons that I wanted
3 to, you know, get in touch with the Helpdesk itself.

4 **Q.** How did that make you feel, working in this environment?

5 **A.** I told myself every day that I'm here just for the year
6 and I'm just seeing it, and I was paid almost twice as
7 much as nearly all the other graduates that I knew, so
8 I knew that I was well paid. And, for me, I thought
9 "It's okay", and speaking with -- from Indian parents,
10 to be fair, my parents, my mum and dad go "This is just
11 work, this is what it's like in the outside world", you
12 would just get told -- and that was really depressing,
13 to be fair, to be told that. And I just thought "Wow,
14 I've got a whole lifetime of this ahead me and this is
15 what it's going to be like so I'd better just get used
16 to it". And I'd just go into work and be just like
17 okay.

18 And nobody ever said anything racial to me, I would
19 just fit in with the team. I was with the most vocal
20 team, which was Squad A. But nobody ever said anything
21 personal to me, I fit in and I could hold my own, I'm
22 quite thick skinned, I grew up in that environment, so
23 it wasn't difficult for me in many ways in such as
24 I look back now, as somebody who has been and worked in
25 the industry for almost 20 years and look back and

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1 think -- you know, now having two boys and having young
2 kids thinking how difficult I would feel if they were in
3 that environment.

4 But me personally, I think I just find it harder now
5 to look back than I did then, whereas -- when it was
6 just a case of: let's just get through the day. It's
7 another day. I'm earning good money. Let's just move
8 on. And that's what it was. But it was difficult.

9 I did know that a lot of conversations were going
10 on, and it was a case of when I would walk into a room
11 sometimes it would go quiet, and I knew some things
12 wanted to be said by certain individuals. So I would
13 almost make an excuse to leave to let them complete
14 their conversation and then go back, because I know that
15 they wanted to say something. And it was a case of
16 managing that environment, for me. But I really took it
17 as a point of: this is something that I've got to go
18 through and learn. And that was really sort of how
19 I navigated my days, really.

20 Q. Turning back to your statement, if we look at
21 paragraph 7, you say:

22 "As for their reconciling issues [the
23 subpostmasters], when we could not help them with their
24 accounts, this would mean we spent a few hours on the
25 phone going through each transaction and trying to

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1 okay, this is going to be a difficult one. And you'd go
2 through all these transactions.

3 And the postmasters themselves were always quite
4 frantic. They were, you know, they were so stressed.
5 "How do I get this? How have I got this figure? How am
6 I going to reconcile this account?"

7 And so, you know, we would work with them for hours.
8 We would really try our best to get down to it. And
9 then, you know, we couldn't resolve it. We'd go to --
10 we'd have a team leader, sometimes floor walkers, and
11 ask their opinions, "Have you checked this? Have you
12 checked that?" We'd go back and try and resolve it, and
13 if we couldn't, it would be like okay, it's
14 a discrepancy. Write it off as a discrepancy. We can't
15 really do anything more beyond that. And it just almost
16 became the norm, in a way. And you'd have postmasters
17 did say, "I had one last week, I was like" -- someone
18 had £46, it was small figures. They'd be like, "I will
19 put money in myself, just to circle it. Just to square
20 the circle, if you like, just to get it to a zero
21 balance." They'd be like, "I've been doing it now for
22 weeks."

23 And it was only when they got these extreme figures,
24 these big figures, that they would call in. And then
25 you'd find that that's when they'd need help. Sometimes

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1 figure out where the financial discrepancy was. We
2 would eventually give up, and we were advised to write
3 off the loss as a 'discrepancy'. This was a word you
4 could hear from every agent's calls."

5 Do you want to elaborate a bit more on your
6 experience with this?

7 A. Yes, and just to caveat what I'm saying, I did feel that
8 every agent, no matter what they said, they did try
9 their best to try to get -- to try to help every
10 postmaster that, you know, they called up. But the
11 Wednesdays days, you would -- and bearing in mind that
12 none of us were from an accountancy background, we were
13 just IT people, but we would almost be bookkeeping live
14 with an individual for an entire week's transactions
15 trying to get down where did they get this discrepancy
16 from. So it would be if you like how many stamps did
17 they sell? How many foreign currency transactions? So
18 these are the transactions, that's what you're supposed
19 to have. We would go line by line through every single
20 transaction trying to understand where did this
21 discrepancy come from. That's why the call would take
22 hours. This is why you had to almost, you know,
23 physically build yourself up sometimes for calls when
24 you knew, when somebody would call and go they've got
25 a discrepancy for a few thousand. And you know right,

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1 when they were small figures they'd tell you, "Oh we've
2 been putting money in ourselves just to get it to zero."

3 Like I said, you could just hear the word
4 "discrepancy". It was probably the most used word, as
5 well, on every call. "Oh, have you got a discrepancy?"
6 Like I said, it quickly went from "How do I do this
7 transaction?" After a few months, people knew all the
8 transactions. "How do I reconcile them?" Then nearly
9 everything was just discrepancy, discrepancy,
10 discrepancy. That's what the calls were really about.
11 People just not being able to, you know, reconcile their
12 accounts to zero.

13 Q. When you say, "We were advised to write off the loss as
14 a discrepancy", who was advising you?

15 A. So now, I really tried to rack my brains on this one
16 because we -- because there was a -- we had a management
17 team that were in the helpdesk. They were in the sort
18 of -- the way that the helpdesk was located, you had the
19 managers that would sit in the middle of the helpdesk.
20 And I was trying to rack my brains and think who was
21 telling me? And I remember it was -- sometimes it would
22 be, like, just one of the people in our team that were
23 the most able on the software. And you'd
24 cross-reference it with some of your colleagues. And
25 then I think they'd put in some team leaders type in

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1 place, because the managers themselves, they didn't know
2 nothing. They never touched the software. They didn't
3 do any training. You'd only go to your managers if you
4 wanted to get a holiday. You'd go to them and go, "Can
5 I have a holiday booked?"

6 And then managers were acutely aware that the floor
7 was struggling, so they almost strategically picked out
8 people out of each squad that were the most able on the
9 software, and sort of made them like floor walkers or
10 team leaders or advocates, if you like. And you'd go to
11 them and say: "Right, okay, I'm struggling."

12 And they would go, "Well, there's nothing we can do.
13 This is a discrepancy."

14 And that was it. It was never the managers.
15 I mean, like I say, other than signing holidays, I don't
16 know what they did. They weren't -- like these days, if
17 you look at call centres, you have people listening in
18 to calls, reviewing calls. In the year that I was
19 there, I honestly can't tell you what they did other
20 than sign our holidays -- you know, sign off holidays,
21 or we'd ask them for that. And there were a good few of
22 them. There were a good five of them -- five, six,
23 seven of them.

24 And it was a gripe that most of the engineers had as
25 well: that what is their role? What do they do?

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1 if you've already made a judgement call on the people
2 that you're supporting as incompetent or corrupt in some
3 way, it would take a lot of people to go, you know, that
4 the software has an issue.

5 Because I think people were -- we were much happier,
6 on the floor, to push down on to the postmasters and go
7 "This is your issue", or "You're not correct", or
8 "You've got the issues", than anyone on the floor
9 going -- pushing this upwards and going, "Is this is an
10 issue here? How can we have so many of these calls?"
11 Like I said, we didn't know who to push up to. And the
12 management were just not visible. Like I said, I just
13 don't know what they did.

14 So you can see it must have taken almost like
15 a snowball effect on -- for someone just to look into
16 this issue to go: "Surely we can't have this many
17 discrepancies?" So you can see how it must have just
18 snowballed. And like I said, I was only there for
19 a year, and maybe it just grew and grew, and then
20 eventually, you know, just through the number of issues
21 and discrepancies, that's how it must have got through.
22 But I don't think the people's, you know, pre-built
23 prejudices, I don't think they helped at all because
24 they could never empathise with the postmasters. They
25 could never understand their issues. Even when they

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1 Because we needed help, we needed guidance, and we
2 didn't really get it. So it was your colleagues. To
3 answer your question, it was kind of your colleagues,
4 and then the floor walkers which were normally -- which
5 were, again, your colleagues that you'd go to. So there
6 wasn't anyone in a senior or a management role that
7 you'd told. And that was again one of the reasons why
8 I wanted to contact the -- because rather than saying it
9 was some sort of mythical big bad manager who was
10 telling you whatever, or guiding you, in the very
11 initial year that I was there when it was set up, it
12 felt very much like a rudderless ship, really, and you
13 were just guided somehow on your own.

14 And I think -- it probably stems from all the other
15 issues I raised -- just the lack of management in that
16 interaction across the floor.

17 **Q.** Do you think genuine issues with Horizon were missed
18 because of the toxic culture?

19 **A.** Being there only a year, it's very difficult to ask that
20 question. To answer that question, sorry. I think it
21 didn't help, it really didn't help, because if people
22 were genuine having software issues, but if you've
23 already got a pre-built prejudice that you can't trust
24 the people or the people are incompetent -- and that's
25 really, like I said, the nub of the issue for me -- is

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1 were upset and crying on the phones -- which we had all
2 the time. Really upset individuals trying to
3 understand, trying to, you know, get their accounts to
4 zero. But I think it's difficult. It's very simplistic
5 to just say that. I think there was other issues
6 involved, but I don't think it helped.

7 **Q.** Is there anything else you wanted to say about your
8 experiences to the Inquiry?

9 **A.** Um, like I said, they would be more personal on me in
10 terms of how I felt as an individual, and I don't want
11 it to blur the fact that this is an issue about
12 postmasters and basically about the Post Office itself,
13 or -- and, you know, their own issues as opposed to how
14 I really felt. I think just -- to me, it was a lot of
15 issues at the time, just a lot of issues of just, like,
16 the postmasters, their technical capabilities, a lack of
17 absence of management, of people. And, you know, I know
18 that now they've got like first, second line teams and
19 problem management and change management, and all this.
20 When I was there, they had just that one team. It was
21 immature. Now I can look back after 20 years in the IT
22 industry, I can look back and see just the people
23 themselves, the managers were not qualified to do the
24 job. The individuals, some of them, should never have
25 been supportive.

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1 It looks just, you know, with hindsight -- and it's
2 easy with hindsight to say these things -- but there
3 were just culpability on so many levels, on so many
4 areas. And it's probably good to have this, the review,
5 to look, just from an organisational point of view, of
6 how these structures, when they're not there, that's how
7 issues like these can arise. When you don't have the
8 change management, when you don't have the problem
9 management, when you don't have analysis. And we didn't
10 have much of that stuff going on, and we had an absence
11 of management, of people not probing in to look as to
12 why there are issues.

13 You know, this is why, you know, since then, you
14 have this ITIL standards or the Service Desk. You just
15 have things that didn't exist at the time.

16 **MS KENNEDY:** Thank you, Mr Singh. I don't have any more
17 questions for you. Mr Stein has a question.

18 **Questioned by MR STEIN**

19 **MR STEIN:** Mr Singh, I represent a large number of
20 postmasters and mistresses. Can we just describe,
21 please, the area where you worked so that the Inquiry
22 can grasp whether you worked in booths or whether you
23 worked in a large, open-floor space. Could you just
24 describe the area you worked?

25 **A.** It was the large -- a large area. We had our own desks

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1 characters." And we just let them go. We would just
2 leave them to it, if you like.

3 They never challenged them but then, like I said,
4 other than signing our, you know, holidays -- asking for
5 holiday, I don't think they did anything, those
6 managers. I look back now and think, you know, the
7 bureaucracy that must have existed to have so many
8 managers which then led on to other managers, and then
9 neither of them, you couldn't really define what their
10 role actually was.

11 **Q.** Two last points. Do you by any chance remember the name
12 of the manager that you were directly dealing with? Was
13 there a single individual that you would have described
14 as being your manager? And if so, can you remember
15 their name?

16 **A.** I can remember their name. So mine would have been
17 Geraldine McEwan, I think it would have been.

18 **Q.** Thank you. Lastly, then, you've said that you don't
19 want to confuse issues between the effect on you versus
20 what was happening to the subpostmasters and mistresses.
21 Was the effect upon you, what you were going through in
22 that period of time, was that something that inhibited
23 or stopped you from, as an example, trying to take it
24 any further within the organisation?

25 **A.** Um, taking it further was never a thought in my mind.

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1 but they were segregated slightly by the squads that you
2 worked in. So you sat with your squad, but it was very
3 much an open desk. There weren't private booths. So it
4 was very much open.

5 **Q.** So if somebody is shouting out from your squad, would
6 another squad be able to hear that, across the floor?

7 **A.** Yes.

8 **Q.** You mentioned the floor walker system, and you've also
9 spoken about managers. In your statement, you say this:
10 that when people were being vocal and toxic in what
11 they're saying, that they were unchallenged by managers.
12 And I quote from your statement that they looked away
13 the managers looked away, "as all Asians were called
14 Patels, regardless of surname."

15 **A.** Mm-hm.

16 **Q.** Did you ever see a manager discuss the behaviour of the
17 individuals who spoke in that way?

18 **A.** No. And I now, being obviously 44 years old and not
19 someone who was like 21 at the time, I would challenge
20 that. But then I think these days it's very rare you
21 would need to challenge that sort of behaviour. But at
22 the time, there were some very strong-willed characters
23 there who had almost, you know, roughshod -- they could
24 ride roughshod over whatever they wanted to say. But it
25 was a case: "Oh, he's a character. Oh, they're

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1 I'm going to be bluntly honest with you. I couldn't
2 wait to get out of that role quick enough, and I did see
3 it as the fact that this is a rite of passage for me.
4 It's something like coming of age, doing my role, doing
5 my time. And the best way to describe it is like if
6 you're in prison and you've got the tally charts and you
7 are crossing the days off to go: right, I'm going to
8 leave on that day. And like I said, I was well paid.
9 And I didn't want people to think that it affected me,
10 the language, as well, on the floor. So I didn't want
11 anyone to think that I'm just weak, in some ways, or
12 that I've got an issue with it, or I've got a chip on my
13 shoulder, or this language, or -- it was easier for me
14 to just go: let's just see it through. It's fine.

15 One thing I do want to mention is that it's very
16 much an issue of I feel, having worked at, like I say,
17 predominantly within the south, within London, within
18 the banking industry, that it's, to me, it was very much
19 a cultural issue of Yorkshire, Wakefield, of communities
20 that don't mix and are mistrusting of each other.

21 And this is why I wanted to raise the issue of this
22 why people that were hiring, the incompetence level of
23 it. If you're supporting people from Wales and villages
24 in Wales and in Scotland, and there predominantly is
25 a lot of Asian people owning post offices, is for you to

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1 understand the people, as well, that you're going to be
 2 supporting. And, you know, be able to put yourself in
 3 their shoes or walk, you know, in effect walk in their
 4 shoes and understand their life situations. And the
 5 people that they were, having supported them, could
 6 never do that, and are almost incapable of doing that.
 7 And I think that's one of the issues that I wanted to
 8 sort of raise as well.
 9 **MR STEIN:** Thank you, Mr Singh.
 10 **THE WITNESS:** Thank you.
 11 **MS KENNEDY:** Chair, I don't think there are any further
 12 questions from any further Core Participants.
 13 **SIR WYN WILLIAMS:** All right.
 14 Well, Mr Singh, I'm very grateful to you for drawing
 15 these matters to my attention and for making contact
 16 with the Inquiry, and being determined to give oral
 17 evidence about these things. So thank you very much.
 18 **THE WITNESS:** Thank you.
 19 **MS KENNEDY:** Chair, that concludes the witness evidence for
 20 today. We're back tomorrow with Mr Andrew Dunks.
 21 **SIR WYN WILLIAMS:** Yes, fine. All right, then. 10.00
 22 tomorrow.
 23 **MS KENNEDY:** Thank you.
 24 (12.46 pm)
 25 (The hearing adjourned until 10.00 am the following day)

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