1   **Wednesday, 3 May 2023**

2 **(10.00 am)**

3 **MR BEER:**   Good morning sir, can you see and hear me?

4 **SIR WYN WILLIAMS:**   I can hear you but I can't see

5   you. Now I can.

6   **ANNE OLIVIA CHAMBERS (continued)**

7   **Questioned by MR BEER (continued)**

8 **MR BEER:**   Thank you very much.

9   Good morning, Mrs Chambers. Yesterday, you

10   gave evidence in the afternoon that ARQ data did

11   not consist of all keystrokes made by

12   a subpostmaster in a branch; do you recall?

13 **A.**   Yes.

14 **Q.**   You said that data was never captured.

15 **A.**   Yes.

16 **Q.**   That was page 160, lines 10 to 13 of the

17   transcript. Before I ask you some questions

18   about that, just by way of background for the

19   Core Participants, in the closing submissions

20   that the Post Office made in the GLO, the Group

21   Litigation Order trial, the Post Office said

22   this in their written submissions:

23   "Fujitsu does have access to a record of

24   keystroke activity. The record must be

25   downloaded from the counter rather than being

          1

1   contained in the events log. The counter log is

2   called the POC log ..."

3   In his Horizon Issues judgment, Mr Justice

4   Fraser found that the audit data, as he

5   described it, recorded all keystrokes performed

6   in a branch by a subpostmaster. For those that

7   are following that, paragraphs 906, 911(1),

8   911(6) and paragraph 995 of his judgment.

9   That conclusion was reflected in

10   paragraph 15 of the Court of Appeal Criminal

11   Division's judgment in the *Hamilton* case,

12   paragraph 15, stating:

13   "Fujitsu held data called ARQ data which

14   contained a complete and accurate record of all

15   keystrokes made by a subpostmaster or

16   an assistant when using Horizon."

17   I want to look at some of the documents that

18   are referred to in support of what the Post

19   Office said in the course of the trial, in those

20   submissions.

21   Can we start, please, with POL00003233.

22   Thank you very much. Now, if we just look at

23   the top line of this, we can see this is a PEAK

24   273234. We can see under the progress narrative

25   that it was raised on 21 August 2018 so that's

          2

1   two years after you left and then, if you see

2   the summary, it says the incident is a "Failed

3   Drop & Go Top Up", that doesn't matter for

4   present purposes.

5 **A.**   Ct.

6 **Q.**   If we go to page 3 of the PEAK, if we just,

7   sorry, look at the bottom of page 2 first so we

8   can see who is writing. It is Joe Harrison.

9   Did Mr Harrison work with you when you were in

10   the SSC?

11 **A.**   Yes, he did, yes.

12 **Q.**   Thank you. Was he a diagnostician too?

13 **A.**   Yes, he was.

14 **Q.**   He says:

15   "This is an instance of [and then he quotes

16   a KEL]. Counter 2 did receive the [and then

17   a message number] unsuccessful message but

18   debited the customer [then he quotes some text]

19   to the amount of [£30] anyway.

20   "As stated in the KEL 'This may be an issue

21   with script ... or a user error. The Drop&Go

22   scripts are supplied and maintained by ATOS.

23   Therefore please route calls to ATOS."

24   Then he says this:

25   "Here are the keystrokes and messages from

          3

1   the counter, which might help ATOS."

2   Then if we scroll down and look at those, we

3   can see that he has seemingly cut and pasted

4   into the PEAK a series of text and can we look

5   at the cut and paste that has occurred.

6 **A.**   Yes.

7 **Q.**   Can you see the first entry and then the

8   majority of the remaining entries --

9 **A.**   Yes.

10 **Q.**   -- refer to a button?

11 **A.**   Yes, this when the postmaster touches the button

12   on the screen and that moves it then -- well,

13   you can just see that the button has been

14   pressed as it moves on to another screen.

15 **Q.**   When you're talking about the button being

16   pressed, what are you referring to?

17 **A.**   A virtual -- have you had the chance to see

18   a post office counter screen --

19 **Q.**   Yes, so a tile on the touch pad?

20 **A.**   A tile on the touch pad, yes.

21 **Q.**   So where it refers to "button", is that

22   referring, is it, to tapping a tile on the touch

23   pad?

24 **A.**   Yes, or using the associated key on the

25   keyboard, so, to that extent, yes, the button

          4

1 presses or the virtual button presses are
2 recorded but not every single keystroke. So we
3 can't see here that a name has been typed in or
4 that, you know, perhaps a name was typed in and
5 then deleted or anything like that. So perhaps
6 I misunderstood yesterday but I still say that
7 not every keystroke is recorded. But for HNG-X,
8 not for Legacy Horizon, we did explicitly ask
9 for this extra level of diagnostics which helped
10 us to see how the user was navigating the system
11 at any point.
12 **Q.** So breaking that down, you remember the example
13 you used yesterday of the £250 versus the
14 £2,500?
15 **A.** Yes.
16 **Q.** If the postmaster -- I think this was showing
17 some cash in?
18 **A.** Yeah.
19 **Q.** If the postmaster wanted to show that they had
20 received £250 in, and the system in the event
21 showed two thousand £500 in, would you be able
22 to tell, starting with Horizon Online that the
23 postmaster pressed a 2, a 5 and an 0 and then
24 Return or commit it to the stack, or whatever
25 the button was to be pressed, rather than
                        5

1 pressing a 2, a 5, and then 00?
2 **A.** You couldn't see that level of detail.
3 Obviously that information, whichever it was,
4 would be captured and then stored on the system
5 when the transaction was committed but then when
6 it's on the system, that would be the number
7 that I am seeing. So I wouldn't be able to tell
8 that, at the point it's actually being recorded
9 by the system, it is not precisely what the
10 postmaster had keyed.
11 **Q.** So if he said, "This system is showing that
12 I was showing a receipt of cash of £2,500, I did
13 not press a 2, a 5 and then 00, I only pressed
14 a 2, a 5 and then a single 0", you wouldn't be
15 able to tell from the keystroke data whether
16 that was accurate or not?
17 **A.** No.
18 **Q.** All that would say is that the system shows that
19 you pressed 2, 5 and 00 --
20 **A.** Yes.
21 **Q.** -- because £2,500 is shown as cash coming in?
22 **A.** And that would also then be shown on the screen
23 to the postmaster, so if he felt that the number
24 was wrong, either because the system was now
25 displaying it to him wrongly or because he'd
                        6

1 miskeyed it, then you would expect that to be
2 corrected at that point.
3 **Q.** Then breaking it down a little further there,
4 you said that not all keystrokes were auditable.
5 **A.** Yes.
6 **Q.** What was the dividing line between those which
7 were and those which were not --
8 **A.** Um --
9 **Q.** -- ie what level of button was auditable?
10 That's a very imprecise question but I think you
11 know what I mean.
12 **A.** Yes, I think any of the buttons that controlled
13 the navigation around the system or where the
14 postmaster -- I mean, you can see the examples
15 on here, where the postmaster was given a choice
16 and had to choose "Yes" or "No". When they were
17 on the home screen and decided to go into
18 a particular area of code, um, that's --
19 **Q.** Trying to go into a particular area of code?
20 **A.** Sorry, yes, when they chose -- sorry, that's
21 inaccurate. When they selected a particular
22 function, for example, Postage or Bill Payment,
23 other things would also be recorded early in the
24 process. If they scanned a barcode, that
25 barcode that had been read would be included in
                        7

1 the logs.
2 **Q.** So you could see the order of events --
3 **A.** Yes.
4 **Q.** -- is that right?
5 **A.** Yes.
6 **Q.** You could see the Pathway that a subpostmaster
7 took?
8 **A.** For HNG-X, yes. And this was really useful for
9 us, for diagnostic purposes, because we were
10 able to see, you know -- we'll see that when we
11 look at some of the specific examples, but we
12 can see, yes, they started to do something and
13 then they used a particular button to move out
14 of it. Perhaps that's not something that would
15 normally happen but that doesn't mean it's
16 wrong.
17   And so that was very helpful to us for
18 diagnosing these problems because we could see
19 the perhaps less expected paths that were being
20 taken.
21 **Q.** You see four entries in, timed at 13.11.31,
22 there is the word or the character string,
23 "MSG10800: Check Parcels and Services Required".
24 Is that a record of a screen being displayed to
25 the subpostmaster, essentially a pop-up that was
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1   displayed on the screen to the subpostmaster?
2 A. I think it was a question that he was asked at
3   that point by a message on the screen. I can't
4   remember exactly how it was would have been
5   displayed.
6 Q. What other ways of displaying it other than on
7   the screen were there?
8 A. Sorry, that was the only way.
9 Q. So where we see the "MSGs" on here, the
10   messages, is that a record -- I'm calling them
11   pop-ups, but essentially messages displayed on
12   a screen to a subpostmaster?
13 A. Yes.
14 Q. Again, the same question: were there some such
15   messages that were displayed and not auditable
16   or were they all auditable in this way?
17 A. I can't remember. I think they were all
18   displayed but I'm not certain. They were not
19   there for audit purposes, if you like; they were
20   there as a diagnostic aid, as I said.
21 Q. What's the difference?
22 A. Audit, I would feel is something that you would
23   return to later and say, "This is precisely what
24   happened and we have captured everything that
25   has happened". This data, although I think it

1   probably does meet those criteria, it wasn't
2   designed with that in mind.
3 Q. How do you know it wasn't designed with that in
4   mind?
5 A. Because I and a colleague asked the development
6   team when we had a meeting before, when HNG-X
7   was being developed, and we said "Gosh, it would
8   be really useful for us if we know what buttons
9   were pressed and we know what messages were
10   displayed".
11 Q. Was any of this available to you for Legacy
12   Horizon?
13 A. Not in the same form at all, no. You could get
14   clues from the messages in the message store but
15   it wasn't designed -- and there was a certain
16   amount of audit -- of diagnostic information,
17   I think we discovered yesterday in the audit
18   file, but this was very helpful at this level.
19 Q. This PEAK doesn't refer to -- Mr Harrison
20   doesn't refer to what he has cut in to the PEAK
21   as a POC log. Is this in fact an extract from
22   a POC log?
23 A. As far as I remember, yes. I don't clearly
24   remember all the filenames.
25 Q. What was a POC log?

1 A. A Post Office Counter log, a file that
2   I think -- I think there was one for each day,
3   I think they were possibly kept for a limited
4   time. It might only have been seven days,
5   I can't remember. They weren't copied off the
6   counter unless we needed to access them but they
7   were there for diagnostic purposes.
8 Q. You said they were only kept, you think, for
9   seven days. Do you mean kept on the counter for
10   seven days but available in an archive after
11   that time?
12 A. No, they weren't archived.
13 Q. They were not archived?
14 A. No, I can't now remember if it was seven days
15   they were kept on the counter or if it was
16   a longer period but it wasn't a very long time
17   and they were not taken off the counter and
18   stored anywhere else, unless somebody in SSC
19   went to get one for diagnostic purposes.
20 Q. Here Mr Harrison is cutting this in to the PEAK
21   on 21 August, if we just scroll up.
22 A. Yeah.
23 Q. Yes.
24 A. Yes.
25 Q. He's referring to events that happened on

1   31 July, so three weeks earlier?
2 A. So it was more likely then it was a month's
3   worth but I cannot clearly remember, I'm sorry.
4 Q. Was that by design, that they were only kept for
5   a limited period?
6 A. I imagine so because, obviously, they could get
7   fairly big and you didn't want to fill up the
8   counter file store more than you had to.
9 Q. Were they only available from the counter store
10   and nowhere else?
11 A. Yes. They -- yes, they weren't kept anywhere
12   else. Obviously, if somebody had gone -- had
13   looked at the same branch two weeks earlier and
14   happened to have extracted that log, they might
15   have it, but they would only be there -- be
16   anywhere else if somebody in SSC had
17   specifically extracted them. That was the case
18   certainly when I left in 2016. I can't say what
19   might have happened since then, of course.
20 Q. Can we look, secondly -- that can come down,
21   thank you -- at POL00001835. Thank you.
22   This is a PEAK 209755. Earlier in time,
23   you'll see that it was opened by Mr Parker on
24   15 April 2011. The summary doesn't tell us
25   anything, six lines in from the top, it just

1 gives the branch FAD code. If we look at the
2 second entry, if we scroll down, we can see what
3 the issue was:
4   "POL has a discrepancy with a postmaster
5 regarding a transaction in Huddersfield for
6 TPoS."
7   What was TPoS?
8 A. I don't know.
9 Q. "The branch thought that they [were] settling
10 the transaction below to debit card but it has
11 been 'automatically settled to cash'. Branch
12 thinks that something went wrong with their pin
13 pad -- debit card [transaction] declined but the
14 branch didn't notice."
15   Then some details for the branch are set
16 out:
17   "This was not noticed until the next day
18 when they balanced and they then pulled off
19 a transaction log and noticed the cash payment.
20 A TfS call for this was logged on the day after
21 the transaction ... and NBSC and HSD both told
22 the PM that it was user error.
23   "It has now been raised again via TPoS
24 introduction managers -- Fujitsu release
25 managers, etc. To provide a sanity check please
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1 retrieve the counter log for node 7 on this date
2 and see if we can add anything?"
3   In short, an issue had been identified with
4 a subpostmaster trying to settle a transaction
5 to a debit card but it had automatically settled
6 to cash --
7 A. Yes.
8 Q. -- and that was only noticed the following
9 day --
10 A. Yes.
11 Q. -- when the subpostmaster tried to balance and
12 saw that the matter had been settled to cash?
13 A. Yes.
14 Q. Then if we can scroll down to Mr Allen's entry,
15 Dave Allen at the foot of the page there. Was
16 he a colleague of yours --
17 A. Yes, he was a colleague.
18 Q. -- doing the same work as you?
19 A. Yes.
20 Q. He says:
21   "Immediately after selecting 'Sell Euros'
22 [message] 'Transaction Prompt' appears; this
23 states 'Transactions paid for using a debit or
24 credit card will require mandatory ID'.
25   "I note this isn't shown in the POC log for
                          14

1 the Huddersfield incident.
2   "Subsequently, the Clerk selected Method of
3 Payment -- 'Debit Card', whereupon [a message]
4 requests entry of the first 4 digits of the
5 card's PAN (the 'Debit Card Prefix').
6   "After entering the debit card prefix,
7 [another message] 'Clerk Instructions' appears;
8 this states 'Do you wish to flag this
9 transaction as suspicious for anti-money
10 laundering purposes? If you select "Yes", you
11 must also complete [the] form [and a number is
12 given]' -- the [postmaster] answered 'No' to
13 this.
14   "After entering the Customer's name and ID
15 (passport) details, the Clerk is returned to the
16 home screen which shows the 'Total Due from
17 Customer' = £500.00 -- as would be expected.
18   "At this point there is nothing to stop the
19 Clerk settling to Fast Cash, even though 'Debit
20 Card' has been selected earlier in the
21 dialogue."
22   Then this:
23   "The POC log confirms that 'Fast Cash' was
24 indeed selected at this point.
25   "There is no evidence in the POC log of any
                          15

1 PIN pad interaction at any time during this
2 session and no evidence of any banking dialogue
3 in the counter message log, and no evidence of
4 the session being settled 'automatically' in
5 some way, rather than by action of the Clerk.
6   "The counter logs can't show us whether or
7 not the Clerk actually took £500 from the
8 Customer, in exchange for 540 Euros.
9   "Conclusion: the Clerk selected Debit Card
10 as the method of payment early in the dialogue,
11 but settled to Fast Cash at the end of the
12 Session."
13   Is this another example of being able to
14 access the buttons pressed and the messages
15 displayed that we saw in the previous PEAK,
16 albeit Mr Allen has not cut in to his entry on
17 the PEAK the text that supports what he has
18 said?
19 A. Yes, he was using the same type of information
20 from the POC log to give a narrative to what
21 seems to have happened.
22 Q. So is it right, then, that the documents we have
23 looked at show what selections, if I can use
24 that word, a subpostmaster has made and what
25 messages are displayed to the subpostmaster in
                          16

1   the course of the session they are engaged in,
2   as opposed to a record of every keystroke made?
3 **A.** Yes, and, yet again, I will say this is only for
4   HNG-X.
5 **Q.** Can we look, please, at an example of where you
6   have seemingly have had access to the POC log,
7   FUJ00085913. You'll see that this is a PEAK,
8   dated 14 October 2015 -- if we just scroll down
9   for the first entry -- with your name against
10   it. It, in fact, concerns Bug 4 that we're
11   going to look at a little later, the
12   Dalmellington bug?
13 **A.** Yes.
14 **Q.** If we see the summary, if we scroll up please,
15   "Horizon -- transaction discrepancies". If we
16   can skip, please, straight to page 5 of this
17   PEAK, and if we look in the -- sorry, page 3.
18   Can you see, right at the foot of the page we're
19   looking at here, it says:
20   "keystrokes: Back Office, Remittances and
21   Transfers, Delivery Scan your barcode"?
22 **A.** Yes.
23 **Q.** Can you help us, where is that information from?
24 **A.** I would have got that from the Post Office
25   Counter log.

<center>17</center>

1   pressed --
2 **A.** Um --
3 **Q.** -- does it?
4 **A.** I would say, yes, it does. They have been asked
5   by the Helpdesk, one of the helpdesks, specific
6   questions and that is what they have answered.
7 **Q.** So where it says, "keystrokes" that's a record
8   of a subpostmaster saying it, is it?
9 **A.** Yes, because those are the -- sorry, those are
10   the buttons that he would press to do this
11   process.
12 **Q.** Then if we go forwards, please, to page 5, and
13   go to the bottom half of the page, please. We
14   can see entries from you from 14 October
15   onwards?
16 **A.** Yes.
17 **Q.** If we look at the third entry there, timed at
18   15.35.38, "Evidence Added", and then is that
19   a POC file reference code?
20 **A.** Yes, it is.
21 **Q.** What's that saying that you have done?
22 **A.** I have, by this time, extracted the POC file for
23   the day from the counter. I have examined it.
24   I made some comments on it, which are further up
25   the screen.

<center>19</center>

1 **Q.** That's a similar sort of cut and paste by you
2   from the POC log into this PEAK?
3 **A.** Yes.
4 **Q.** If we go forward, then, to page 5 --
5 **A.** No, actually, that's not -- hang on, that's not
6   me, because this is still an update that has
7   been put on by --
8 **Q.** If we just go back to the foot of page 1.
9 **A.** Yes, this -- yeah, this bit that's highlighted
10   at the moment is information that's either been
11   provided by it looks like it might have been
12   provided by NBSC.
13 **Q.** Look at the foot of page 1. That's where this
14   entry begins, I think.
15 **A.** Yes. So this is information that has either
16   been -- that has been added by HSD, or whatever
17   they were called at this point in time, based on
18   information that they had received from NBSC.
19 **Q.** So did NBSC have access to the POC log then?
20 **A.** No. They must have asked the branch what they
21   had pressed to get into this situation.
22 **Q.** Just go back to that entry we were looking at.
23   If you look at the whole entry, that doesn't
24   look like it's the record of a conversation in
25   which a subpostmaster said what buttons they had

<center>18</center>

1 **Q.** Yes.
2 **A.** I have put it through the obfuscation process to
3   make sure that no personal data is visible to
4   unauthorised staff and then, once it was
5   downloaded, it was automatically attached to the
6   PEAK.
7 **Q.** Do we see the automatic attachment three
8   entries, four entries on, where there's
9   an underlined entry reading "8th Oct poc.log"?
10 **A.** Yes, I've added two different logs, one for
11   8 October and one for 1 October.
12 **Q.** So if we had the PEAK system available to us
13   now, that would be a hyperlink through to those
14   files, would it?
15 **A.** Yes, I don't know if those files would --
16   underlying files would still exist or if they
17   were deleted after a certain length of time.
18 **Q.** Look at it the other way, then, back in 2015, if
19   you clicked on those, that would take you
20   through?
21 **A.** Yes.
22 **Q.** So what was the purpose of putting the
23   attachments in, in this way?
24 **A.** To make that available to fourth line support,
25   who were GDC by this point.

<center>20</center>

1 Q. If we go to the foot of the page, please the
2   second entry up from the bottom, you say:
3   "Routing to GDC [fourth line support, yes]
4   to investigate by user was able to press and
5   enter and settle the same 'rem in' basket
6   multiple times. I have not managed to reproduce
7   this."
8   So can you tell from that entry, and in the
9   absence of us having a POC log, the extent of
10   the data that you were able to see.
11 A. I was able to see the button presses and, if we
12   could just go up the page a little bit, I did
13   put an update on to say there that I could see
14   from the button presses that "Enter" had been
15   pressed several times --
16 Q. If you keep going up, the second entry there at
17   17.42.11.
18 A. Yes.
19 Q. "I can see that the clerk pressed Enter 4 times
20   ..."
21 A. Yes.
22 Q. So thinking of the division that we made earlier
23   or the evidence you gave about the division
24   earlier, on what the POC log data did and did
25   not record, this seems to suggest that delivery

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1   receipts were printed and then the clerk just
2   pressed "Enter" four times?
3 A. That's what the log showed, yes.
4 Q. So you could see a keystroke --
5 A. I could see those keystrokes, yes. I -- yes.
6   You could see the -- and pressing that key would
7   then cause the screen to move to a different
8   screen, so it was -- these were navigational
9   keystrokes or keystrokes in response to
10   messages, and so on, you could see.
11   When you asking yesterday, I thought you
12   were asking about every key that was typed and
13   certainly that was not all recorded.
14 Q. So if, in my example of committing cash to the
15   account earlier of the £2,500 versus the £250,
16   if the clerk, after they had typed £250, had hit
17   "Enter" four times, would you be able to see
18   that?
19 A. Um -- it would -- it would depend precisely how
20   it was set up. You might be able to see "Enter"
21   being pressed but I can't be certain. I don't
22   know.
23 Q. What, if you can assist us, please, what on this
24   occasion allowed you to see multiple button
25   presses of the same nature?

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1 A. I can't --
2 Q. Is it the function being performed?
3 A. It's the function being performed. I can't
4   remember what the question was that they were
5   pressing enter in response to. I think it is
6   recorded somewhere. It may well be -- maybe it
7   was something along the lines of "Has the
8   receipts printed properly?" They pressed
9   "Enter" for yes, which should then have taken
10   them out of the process but, because there was
11   an error situation, it went backwards and then
12   printed a second delivery receipt and then they
13   were asked again, has it printed? It had, so
14   they pressed "Enter" for yes and, again, it
15   was -- this was an error situation but they were
16   pressing cases "Enter", which should have taken
17   them out of the process but it wasn't working as
18   it should.
19 Q. Thank you, that can come down from there.
20   That's the only questions I ask about that topic
21   from yesterday.
22   Can we go back to where we were from last
23   night and explore your contact with
24   subpostmasters. As we read yesterday in
25   paragraph 212 of your statement, you said that

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1   the subpostmasters were not your clients. If
2   you spoke to a subpostmaster, did you give them
3   your name?
4 A. Um, I'd certainly give them my first name.
5   Probably not usually my surname.
6 Q. Did you give them a means of contacting you?
7 A. No.
8 Q. Why was that?
9 A. Because they were not meant to have direct
10   access through to third line support.
11 Q. How would they get access to you?
12 A. They could phone the helpdesk and ask that
13   a message be passed to me and that did very
14   occasionally happen.
15 Q. How very occasionally?
16 A. I don't know. Three or four times ever,
17   perhaps.
18 Q. In the 16 years?
19 A. Yes. It wasn't something that -- I mean, the
20   whole point of having a support structure is
21   that you've got the people nearer the bottom who
22   are actually beavering away, resolving the
23   problems and doing the investigations and
24   I think almost any support system you have
25   a certain amount of filtering with what direct

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1   contact there can be.
2 Q. Was there a duty or an obligation on you to
3   speak to any subpostmasters or was it entirely
4   at your discretion, if you thought it might help
5   solve the problem?
6 A. It was at my discretion and I was slightly
7   surprised there didn't seem to be any guidance
8   given on that.
9 Q. Surprised at who?
10 A. Perhaps at the general processes but, you know,
11   I came into a team that was already up and
12   running, working in their way and when you're
13   doing that, coming in as somebody new, you
14   follow what everybody else is doing.
15 Q. We saw also yesterday that in paragraph 42(iv)
16   of your statement you said that the MSU was
17   responsible for liaising with the Post Office
18   via BIMS reports, if there were errors which
19   affected counter balancing?
20 A. If there were errors that affected the branch
21   accounts or client accounts, bills being paid,
22   information being fed through, they covered that
23   area as well and also banking transaction
24   discrepancies -- not discrepancies, anomalies.
25 Q. As counter balancing was your specialist area,

                          25

1   to the Post Office to get approval for such
2   corrective amendments?
3   A. It went through whatever the particular change
4   control process was at that point and, in
5   practice, it would usually be the managers in
6   the Service Management Team who would talk to
7   people at Post Office.
8   Q. So who was your point of contact then, within
9   Fujitsu first?
10 A. Well, I would -- obviously, it changed over the
11   years. The formal way of doing it was for me to
12   fill in a form saying what was to be done, and
13   so on, and then there were people who had to
14   read that information and sign off that form.
15   In practice, I would probably talk to my
16   manager, a problem manager, one of the customer
17   service managers. It just depended who had been
18   involved with it. But there was a formal
19   sign-off process, as well, which would always
20   have included the SSC manager and one of the
21   customer service managers.
22 Q. How did you find out whether the Post Office had
23   approved the corrective amendments?
24 A. That would be added to the OCP, OCR, MSC --
25   I can't remember all the acronyms -- but it was

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1   did that mean that you had more contact or
2   a greater relationship with the people in MSU
3   than others in the SSC?
4   A. Um, no, I think a lot of the counter calls --
5   calls raised by MSU tended to be shared out
6   amongst the teams, so I think a lot of different
7   people would have had contact with them.
8   Q. Were the MSU involved in getting the Post
9   Office's approval for inserting or amending data
10   into branch accounts?
11 A. We couldn't amend data into branch accounts and,
12   no, they weren't.
13 Q. You said you couldn't amend branch accounts?
14 A. Yes.
15 Q. What do you mean by that answer?
16 A. You couldn't amend data that they had already
17   written. All that we could do was to insert
18   extra corrective transactions in the very few
19   cases where that was seen to be the best thing
20   to do to resolve a system problem that had
21   already happen.
22 Q. Were MSU involved in getting approval for
23   inserting extra corrective transactions?
24 A. No.
25 Q. Who was your point of liaison, therefore, back

                          26

1   part of the formal process that there had to be
2   a name and a sign-off on that. But I was not
3   responsible for actually going and seeking that
4   and making -- I just filled in the form to start
5   with and then other people were in charge of
6   making sure that the correct sign-offs were done
7   before I was then given the authorisation to do
8   a change.
9   Q. You said yesterday afternoon, right at the end
10   of the session of your evidence, that you knew
11   of cases where the Post Office did not tell
12   a subpostmaster that their financial data had
13   been altered remotely by somebody within
14   Fujitsu. That's at page 207, lines 20 to 24.
15   What was that knowledge based on?
16 A. Discussions, sometimes along the line of are
17   Post Office going to -- I wouldn't necessarily
18   be speaking directly to somebody within Post
19   Office for this, although I know there's one
20   occasion when I did, at least. But there were
21   several occasions where we'd say, "Will you
22   notify the branch or shall we?" And they'd say,
23   "No, we don't think it's necessary to notify the
24   branch".
25 Q. Why would they say or what reason did they give

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1   for it not being --
2 **A.** I don't --
3 **Q.** -- hold on -- for saying it's not necessary to
4   notify the branch that their financial data had
5   been altered remotely by somebody within
6   Fujitsu?
7 **A.** That was their decision to make. I don't know
8   why they would make it. I would always have
9   been happier if the branch had been fully
10   informed.
11 **Q.** Why would you have been happier if the branch --
12 **A.** Because I always thought --
13 **Q.** -- hold on. The transcriber has to write down
14   what we say and it's easier if I get the
15   question out and then you answer.
16 **A.** Yes.
17 **Q.** I'm guilty of it as well, of interrupting you.
18   So did they give any reasons for not wishing
19   to inform the branch that their financial data
20   had been altered remotely?
21 **A.** I've seen it written down in one or two
22   instances, I think, because they didn't want to
23   let the branch know that there had been a system
24   problem.
25 **Q.** So deliberately keeping the existence of

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1 **Q.** Well, did it seem to you that, in this respect,
2   the Post Office was applying an approach, so far
3   as the subpostmasters were concerned, of the
4   least said to them, the soonest mended?
5 **A.** I can't speak for Post Office but I certainly
6   got the feeling they did not want the -- there
7   were occasions when they didn't particularly
8   want the postmasters to know about problems.
9 **Q.** Can we look at some documents, please, starting
10   with FUJ00142197. This is an email sent from
11   you to Gareth Jenkins, and Andrew Keil and Mik
12   Peach, on 10 December 2007.
13 **A.** Yes.
14 **Q.** If we read it together, you say:
15   "Gareth,
16   "We have a problem with a branch where
17   a single SC line was written for 100 Euros
18   (£484) with no settlement.
19   "This was in the middle of two RISP
20   transactions and I suspect it's another oddity
21   in the LFS counter code.
22   "Initially it caused a harvester exception
23   because some of the BlackBoxData info was
24   missing, but that was corrected (so has gone to
25   POLMIS?) and now the set of transactions for the

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1   a Horizon system fault from the subpostmaster
2   that it affected?
3 **A.** I think that certainly did happen on some
4   occasions.
5 **Q.** Were you uncomfortable with this?
6 **A.** Yes, I was, really. I just felt it would be
7   a lot clearer if everybody -- if the branches
8   knew when there had been a problem. I -- if
9   I spoke to a branch and there had been a system
10   problem then I would say, "There has been
11   a system problem".
12   One particular instance I can remember where
13   we -- I know the branch wasn't contacted was
14   where, as far as we were aware, the branch
15   was -- didn't know that the problem had
16   happened, it had been brought to our attention
17   because of an entry on the Reconciliation
18   Report, and so undoing what had been wrongly
19   recorded seemed like the best way forward and
20   they may well not have been aware that they had
21   had a problem in that case.
22 **Q.** When you refer to the "best way forward" do you
23   mean the open and honest way forward?
24 **A.** The way to resolve it perhaps with fewest
25   questions.

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1   day don't net to zero, hence on the Incomplete
2   Summaries report.
3   "I don't know what to do about it. As it
4   stands, when they balance I think they will have
5   a gain at the branch. If we correct the POLFS
6   feed so it nets to zero it will not be in line
7   with the branch, and will probably cause
8   problems in future.
9   "This might be a case for writing
10   a corrective message at the counter but this has
11   not been a popular approach in the past."
12   Then you ask some questions.
13 **A.** Yes.
14 **Q.** You say that inserting a message was not
15   a popular approach in the past. Is this
16   a reference to what you were just describing or
17   is this a different issue?
18 **A.** This is a reference to Post Office not wanting
19   us to make corrections.
20 **Q.** So this is the same issue that we were just
21   discussing?
22 **A.** Yes, this is.
23 **Q.** But this isn't a communication between you and
24   the Post Office, between Fujitsu and Post
25   Office, this is an internal communication?

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1   A.   Yes.
2   Q.   Did Post Office's desire not to reveal to
3   subpostmasters errors in the system have
4   an effect on the extent to which you did insert
5   corrective messages at the counter?
6   A.   Um, I don't think the alternative to writing the
7   corrective message was doing absolutely nothing.
8   Something had to be done about this particular
9   problem because, as I said, in this case it was
10   going to cause them potentially a gain, and
11   they'd got the sort of equivalent of a -- they
12   would have the equivalent of a -- now, would
13   they? Yes, they would have had a receipts and
14   payments mismatch or a non-zero line on their
15   branch trading statement. Sorry, this -- I'm
16   trying to remember a long way back now.
17   Q.   Yes.
18   A.   Because they hadn't balanced, there was still
19   an opportunity where a corrective message at the
20   counter to cancel out this incorrect line would
21   have put them in the state that they should have
22   been in, so it seemed worth considering that.
23   Q.   What I'm asking is it seems that, by at least
24   December 2007, the reluctance of the Post Office
25   to reveal to subpostmasters, through the use of
                              33

1   more details as to precisely what will happen,
2   and then I'd already talked to Gary Blackburn at
3   Post Office about it, so this is obviously after
4   the discussion that I had with Gareth.
5   And then further down we can see that
6   approval has been sought from Post Office
7   through the formal route and there should also
8   be sign-off by my manager.
9   Q.   Thank you. So if we just read through it
10   together:
11   "Write corrective bureau message for [then
12   the branch code is given].
13   "A single ... message ... was written in
14   error on 26th November ... selling 1,000 US
15   dollars, with no corresponding settlement line.
16   To remove the effects of this message at both
17   the branch and on POLFS, we will need to insert
18   a new message to negate the effects of the
19   original message.
20   "Justification: If the change is not made in
21   the counter messagestore (before the stock unit
22   is balanced on Wednesday), the branch will have
23   an unexpected gain of £484 (or thereabouts ...),
24   and a receipts and payments mismatch. This gain
25   would have to be resolved at the branch. There
                              35

1   corrective action, errors in the system was
2   having a chilling effect on you within Fujitsu
3   about your willingness to do it?
4   A.   Yes, I --
5   Q.   Would that be fair?
6   A.   Um, I mean, there's the other position, which is
7   that, you know, writing a corrective message,
8   SSC making changes to counter accounts, you can
9   understand why there was quite a reluctance to
10   give us permission to do that as well.
11   Q.   Why?
12   A.   Possibly because, at some levels, it was thought
13   that we didn't have the ability to do that.
14   I don't know. I cannot speak for Post Office.
15   Q.   Can we look, please, at FUJ00087194. This,
16   I think, is related to the email that we just
17   saw.
18   A.   Yes.
19   Q.   Just looking at the whole page first, can you
20   describe what this document is?
21   A.   Sorry, can I have a drink and a cough.
22   Q.   Yes, of course.
23   A.   This one of the change procedure documents, so
24   an OCP which I filled in what has been proposed,
25   why the change is justified, when it'll be done,
                              34

1   would also be an inconsistency between the
2   branch and POLFS to be resolved. By correcting
3   the problem locally, the branch may not be aware
4   of the problem, and there will be no
5   inconsistency between the branch and POLFS."
6   You set out when it's planned for. You set
7   out some extra detail. Then you say:
8   "The message will include a comment to show
9   it has been inserted to resolve this problem
10   (this will not be visible to the branch)."
11   Skipping a paragraph, you say:
12   "Neither the new nor the old message will be
13   included in data sent to POLFS."
14   So I think this is a record to show that,
15   despite the misgivings in the email exchange we
16   looked at earlier, authorisation had been given.
17   But you record twice on this document that, by
18   doing it this way, the branch will not be aware
19   of the problem and that the message will not be
20   visible to the branch. Why was it important to
21   record those two things?
22   A.   Just so it was known that that was the case.
23   It's not saying that none of it would have been
24   visible to the branch. They would have been
25   able, if they'd printed their transaction log,
                              36

1   they would have seen the first transaction and
2   they would also see the equal but opposite
3   transaction. They would see that but they would
4   not have seen the comment --
5 Q. Who had done it?
6 A. -- of who had done it.
7 Q. Why was it important to record that the "who had
8   done it" will not be shown to the subpostmaster?
9   Why were you writing that on here?
10 A. Um, just in case anybody at some point in the
11   future wanted to know. I just tried to -- you
12   know, I wrote down as full a description as
13   I could of what was happening and so, if there
14   was a question at some point, we would know this
15   particular fact.
16 Q. In writing it, were you giving some reassurance
17   to POL "Don't worry, this won't be shown to the
18   branch. They won't see what's going on here"?
19 A. I don't recall that being my intention at the
20   time. I certainly wasn't doing anything to try
21   to specifically hide it from the branch.
22 Q. Wasn't that the effect of what you were doing,
23   though?
24 A. I don't think I could have added anything on
25   that would -- could I have made it obvious to

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1   them in some way? I'm not sure.
2 Q. Wouldn't telling the branch assist them in
3   future --
4 A. Yes.
5 Q. -- in that if there had been a recurrence that
6   was not picked up, then they might understand
7   better how it had happened?
8 A. A recurrence would have been picked up by the
9   same things that picked up this one. They
10   hadn't reported "This is a problem already". If
11   it had happened again, it would have been picked
12   up by the same mechanism that picked it up this
13   time.
14 Q. So are you saying that it's best not to worry
15   them with a fault in the system?
16 A. I wasn't making the decision as to whether the
17   branch should be informed or not. But, yes, by
18   doing it in this way, maybe I was thinking, "Oh
19   good, we can just get it sorted out before they
20   balance, they don't need to be bothered by it".
21   That probably -- you know, if I had realised
22   I was going to be questioned about it so long
23   afterwards, I might have possibly made
24   a different decision but that's the decision
25   I made back in 2007.

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1 Q. Did the Post Office tell you to undertake this
2   correction in a way that did not reveal this
3   information to the branch?
4 A. I don't recall them specifically saying that.
5 Q. Or did you do it in that way, as a matter of
6   choice, because you knew that's what your
7   client would want?
8 A. I cannot remember and I haven't seen any
9   documentation as to whether I had a conversation
10   with Gary Blackburn as to whether he was going
11   to contact the branch about this or not, and
12   I don't know what he said in reply. I think
13   I probably would have asked him that question
14   but I can't remember.
15 Q. I mean, is what we see here -- you undertaking
16   the corrective transaction in a way that does
17   not reveal the way in which the corrective
18   transaction has been undertaken and who has done
19   it to the postmaster -- reflect the view that
20   you received from the Post Office, that it was
21   important not to reveal to subpostmasters any
22   hint that there were issues with the reliability
23   of Horizon?
24 A. I don't think I took this action for that
25   reason.

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1 Q. Albeit the effect of your actions was not to
2   reveal to a subpostmaster the person and the
3   means by which the corrective action had been
4   undertaken?
5 A. That was the result of what happened, given that
6   Post Office chose not to talk to the postmaster.
7 Q. Can we look, please, at POL00023765. This is
8   a PEAK from 7 December 2007; can you see that?
9 A. Yes.
10 Q. From the summary, the issue is with a branch and
11   a branch FAD is given, "POLFS Incomplete
12   Summaries Report". You become involved in this
13   later.
14 A. Yes.
15 Q. Can you recall or explain what an incomplete
16   summaries report is?
17 A. Where the transactions, which had been for
18   a day, for a branch, were harvested to be sent
19   on to POLFS, which was their financial back end
20   system. If the transactions didn't net to zero
21   then they would not be sent and we would have to
22   investigate, you know, why there was an issue.
23 Q. If we go over the page, we can see, I think, you
24   attaching some files, is that right, on
25   10 December?

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1   A.   Yes. This is the same branch as before.
2   Q.   Yes.
3   A.   Yes.
4   Q.   We can see on the 11 December a couple of files
5   or links to files, entitled "Details of how
6   POLFS feed was corrected" and "Correction made
7   to counter messagestore"?
8   A.   Yes.
9   Q.   Again, are they hyperlinks to documents --
10 A.   Yes.
11 Q.   -- that we -- I don't think we have those. But
12   anyway, if we go to the foot of the page,
13   please, and look at Andy Keil's entry. Was he
14   a colleague of yours in SSC?
15 A.   Yes, he was.
16 Q.   He notes at 17.19.46:
17   "Worth noting that the branch did not have
18   any issues with the mismatched transactions
19   because this was fixed before they did the roll.
20   The branch is not aware of this and it's best
21   that the branch is not advised."
22 A.   Yes.
23 Q.   Again, is that a further reflection of a culture
24   within the SSC of it's best not telling the
25   branches where such corrective measures are

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1   undertaken to their financial data by the SSC?
2   A.   I think it's just reflecting that, in this one
3   specific case, Post Office had said that they
4   did not want to -- they were not going to
5   contact the branch.
6   Q.   You said "in this one specific case".
7   A.   Yes.
8   Q.   You said earlier in your evidence and last
9   night, that you were aware of cases where the
10   Post Office did not tell a subpostmaster that
11   their financial data had been altered remotely
12   by somebody within Fujitsu. You're not
13   suggesting that this was the only example of it,
14   are you? Rather, this is reflective of that
15   wider practice, is it not?
16 A.   This is the call that I had in mind when giving
17   those answers. Very, very hard to remember now
18   but I think, as time went by, we were aware that
19   Post Office certainly did not always want to
20   tell the branches of faults, and so on. But
21   I wouldn't say that this was fixed within SSC.
22   As I've said before, if a branch had raised the
23   problem themselves and we were talking to them
24   and it -- we knew it was a system error, then,
25   yes, we would say so.

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1   if the --
2   Q.   Did the Post Office ever give any good or
1   Q.   What explains the difference of approach, then,
2   if the --
3   A.   Because the branch may not have been aware of
4   this issue. It had only been -- they hadn't
5   reported it as a problem. It had only been
6   picked up on our internal reports.
7   Q.   Did you feel uncomfortable with this?
8   A.   Yes, I did. I would -- I think I said earlier,
9   I would rather that the branch had been involved
10   in the discussions, so they knew what was
11   happening.
12 Q.   Is this another case of you just doing what was
13   common practice and that which your client
14   wished you to do?
15 A.   I don't think it's that unreasonable to do what
16   your client wishes you to do. As to whether it
17   was common practice, this, you know, the whole
18   process of making counter corrections was pretty
19   unusual. It was not something that was
20   happening every week, every month. They were
21   very, very few and far between. So this was
22   what our client wanted at the time. Perhaps it
23   was me anticipating what our client might or
24   might not want to do. But, personally, I would
25   have been much happier if the branch was aware

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1   what was being done.
2   Q.   Did the Post Office ever give any good or
3   substantial or honourable reasons for not
4   wishing for this material to be revealed to the
5   subpostmaster?
6   A.   I'm not sure that they gave us our reasoning --
7   gave us their reasoning in that way, no.
8   Q.   Was it a case, then, that they were -- the
9   reason was the least the subpostmaster knows
10   about errors in the system, the better?
11 A.   I think you have to ask what Post Office what
12   their thoughts on that are. But I would say,
13   yes, I did get that impression at times.
14 Q.   How and from whom did you get that impression at
15   times?
16 A.   I think possibly once or twice I was on
17   a conference call about a system problem with
18   Post Office people, and I think I've seen at
19   least one document where it's minuted that they
20   don't want -- they didn't want to give
21   opportunities for fraud, if postmasters became
22   aware of certain issues.
23 Q.   Can you just explain how revealing to
24   a subpostmaster that a corrective action had
25   been made to correct a bug in the system would

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1   give an opportunity for a subpostmaster to
2   commit an offence of fraud?
3 **A.** I wasn't talking about corrective actions there,
4   I was talking more about overall discussion of
5   system problems that had occurred. I don't
6   recall that ever being said. In fact, I'm sure
7   that wasn't ever said in any discussion as to
8   a single corrective action at a branch.
9 **Q.** We've seen some evidence that people such as
10   Penelope Thomas, Andrew Dunks, Brian Pinder
11   produced ARQ branch data for the purposes of
12   proceedings. Was there any method to alert them
13   that corrective action had been taken to insert
14   data or extra messages into a branch's accounts?
15 **A.** If they had looked at all the PEAK calls for
16   a branch, they might have seen those but I don't
17   know if that was part of their process. The
18   OCR -- the ARQ data would contain the -- both
19   the original transaction and the corrective
20   transaction at the point at which they were
21   done.
22   If the full unfiltered data was retrieved
23   and inspected, then that would show the comment,
24   for example, that I mention was added in this
25   one. Certainly sometimes for counter

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1   corrections, and it wasn't done consistently,
2   but often we might use a counter number that
3   didn't exist to make it clear that it was
4   something out of the ordinary, or a username,
5   including SSC, again to show that it was
6   something out of the ordinary.
7   That wasn't done on this specific one and
8   I cannot remember whether that was because I was
9   specifically asked not to or I was just
10   producing a transaction that was absolutely
11   a mirror image of the one that shouldn't have
12   been there in the first place, and all I did was
13   just change the signs on the values,
14   effectively, and I left all the other data in
15   there as it was. But I cannot properly remember
16   my reasoning.
17 **Q.** What was the purpose of using a fictitious
18   username?
19 **A.** To make -- well, if it had "SSC" in it to make
20   it clear that it was not done by somebody at the
21   branch.
22 **Q.** Did you always use SSC or did you use other
23   fictitious usernames that did not identify the
24   SSC as having made the change?
25 **A.** It would always have been something that was

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1   very clear that it -- I -- as I say, I can't
2   remember without an example if it would have
3   been something like SSC999, which would have
4   been a valid username, or something else, but it
5   wouldn't have "Fred12" or something. It would
6   have been something to draw attention to it, not
7   to try to hide it.
8 **MR BEER:** Yes, thank you.
9   Sir, that might be an appropriate moment for
10   the morning break, as I move next to some
11   examples of bugs, errors and defects.
12 **SIR WYN WILLIAMS:** Yes, by all means. How long do
13   you think is appropriate?
14 **MR BEER:** Until 11.30, please, sir.
15 **SIR WYN WILLIAMS:** Yes, fine.
16 (11.12 am)
17   **(A short break)**
18 (11.30 am)
19 **MR BEER:** Good morning, sir, can you continue to see
20   and hear me?
21 **SIR WYN WILLIAMS:** Yes, I can. Thank you.
22 **MR BEER:** Thank you very much.
23   I keep promising to get on to bugs, errors
24   and defects but I've still got to cover
25   something that I rather skipped over,

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1   Mrs Chambers.
2   Can we go back, please, to POL00023765.
3   This was the PEAK that we just looked at about
4   the corrective action.
5 **A.** Yes.
6 **Q.** If we can just look at the foot of page 2,
7   please, we've got the message or the entry by
8   Andrew Keil that we looked at in the morning
9   session at 12 December, 17.19.46?
10 **A.** Yes.
11 **Q.** "Worth noting that the branch did not have any
12   issues with the mismatched transactions because
13   this figure before they did the roll [the
14   rollover]. The branch is not aware of this and
15   it's best the branch is not advised."
16   So is that recording that by 12 December,
17   the fix had been applied?
18 **A.** Um, I assume so. Yes. I mean, it was in the
19   OCP when it was due to be applied.
20 **Q.** Yes. If we just go over the page to an entry
21   that I didn't take you to, your entry on
22   14 December at 16.13.37. You say:
23   "As detailed above, the two POLFS incomplete
24   summaries ... have been resolved.
25   "The counter problem which caused the first

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1   issue has been correct by inserting a message
2   into the messagestore, for equal but opposite
3   values/quantities, as agreed with POL ..."
4   Then you give the OCP reference.
5 A. Yes.
6 Q. "As a result of this corrective action, the net
7   effect on POLFS is zero, and POLFS figures are
8   in line with the branch. POLMIS received both
9   the original message and the corrective
10   message."
11   But then you say this:
12   "Once the problem was corrected, there
13   should have been no impact on the branch.
14   However it has been noted that the stock unit of
15   BDC had a loss of [£]1,000, which was generated
16   after the correction was made. We have already
17   notified Gary Blackburn at POL (email attached).
18   This appears to have been a genuine loss at the
19   branch not a consequence of the problem or
20   correction."
21   So by 12 December the corrective fix had
22   been applied concerning a loss of $1,000. After
23   that correction had been effected, a stock unit
24   showed loss of $1,000. It was only generated
25   after the correction was made and you're saying

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1   into the main safe to see what happened.
2   Another is that I'm now wondering if this line
3   that was incorrectly written as an "SC", serve
4   customer, should actually have been another of
5   these RISP lines, which was reversing a rem out,
6   and so whether it now -- can I get this right?
7   Yes, that would -- if it was the case, that
8   would have had this effect.
9   But I agree now, certainly given those
10   circumstances, it would have been far, far
11   better to have talked to the branch at that
12   point to try and work out whether they did have
13   a genuine loss at the end of the day, whether it
14   was something that they then could resolve
15   themselves. I'm not aware that they ever phoned
16   in about it. I don't know if Gary Blackburn,
17   who was aware of this, ever contacted them or
18   checked to see if they did have any lasting
19   problem, but no, this -- it was not as a result
20   of the correction, but it wasn't the state that
21   we wanted to end up in.
22 Q. On what basis did you, in the light of what
23   you've just said, conclude that this was
24   a genuine loss at the branch?
25 A. Um, I don't know. I mean, because I had checked

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1   that this appears to be a genuine loss of the
2   branch and nothing to do with the correction.
3 A. Yes, I have obviously been thinking about this
4   quite a lot. The loss was only generated when
5   they balanced so that's why it showed at that
6   point, they hadn't balanced before then.
7   I think my conclusion that it wasn't
8   a consequence of the problem may have been
9   wrong. It wasn't a consequence of the
10   correction. I know that Mr Justice Fraser
11   considered some of this and there was -- I'm
12   afraid we haven't got the documents in front of
13   us, but his view was that there had been two
14   different corrections done and one of them was
15   for the wrong amount, and I can -- I disagree
16   with that strongly, in that the correction that
17   he thought was for the wrong amount didn't
18   affect the branch accounts at all. That was the
19   correction to the POLFS back end feed.
20   But yes, the branch then had a loss in this
21   stock unit. One possibility was that they had
22   done a balance snapshot or something during the
23   week and realised that, actually, they had got
24   $1,000 more than they expected in that stock
25   unit and had taken it out of there and put it

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1   very carefully and I could see that my
2   correction had done precisely what I intended it
3   to, which was to remove this rogue SC line,
4   which should not have been written. It's only
5   now I'm wondering if, when it was written, it
6   should actually have been another RISP line but
7   I can't prove that at this point.
8   Obviously, if the branch had raised
9   another -- a call saying that they'd got
10   an unexpected loss, "What on earth has been
11   going on", then that would have been
12   investigated and followed through but, to the
13   best of my knowledge, they didn't.
14 Q. Did it occur to you at the time that the amount
15   of the correction, the value of the correction
16   that you had made, was equal to the value of the
17   loss that was now being shown?
18 A. Yes, of course it did. Which is why I checked
19   and double checked and triple checked.
20 Q. And therefore might be a relationship between
21   the two?
22 A. Yes.
23 Q. Isn't what you've just said though, to put the
24   burden back on the branch, to say they need to
25   complain again, they've got to go through the

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1 whole rigmarole of going to NBSC again?
2 **A.** They hadn't actually complained at all.
3 **Q.** No.
4 **A.** They didn't raise the original call.
5 **Q.** Okay, they would have to go through a rigmarole
6 for the first time, then?
7 **A.** Yes.
8 **Q.** Okay, we'll move on. I'm going to ask you about
9 as many of Bugs 1, 2, 3, 4, 5, 6, 7, 8, 10, 19
10 and 23 as identified in the appendix to the
11 judgment of Mr Justice Fraser in the Horizon
12 Issues trial as time allows today, and then I'll
13 revert to the process when we meet again for the
14 Phase 4 evidence.
15 I'm not going to rely on his findings for
16 the purposes of asking you questions, not least
17 because we have more material than was
18 apparently made available to Mr Justice Fraser.
19 Just so you understand, what I'm going to try to
20 do is firstly seek to understand in general
21 terms what the nature of the relevant bug was,
22 in a very high-level summary, then identify the
23 issues that I would like to try and explore with
24 you, then run through the material in
25 chronological order that concerns that bug, and
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1 then explore any issues that are left that
2 haven't been addressed.
3 I'm not going to explore the bugs in
4 chronological order, simply do them 1, 2 and
5 following.
6 **A.** Yeah.
7 **Q.** Before we get to that, would you agree that not
8 all errors in the Horizon System were caught by
9 the automated processes set up by Fujitsu to
10 detect errors?
11 **A.** Yes.
12 **Q.** You tell us in your statement -- no need to go
13 there, it's paragraph 41 -- that:
14 "From around 2007 a real-time monitoring
15 system was developed by the SSC to alert us to
16 system-wide problems, for example a large number
17 of debit card transactions failing. This system
18 was tweaked and expanded over the years."
19 What was the name of that system?
20 **A.** The SSC monitor? Um, I can't properly remember.
21 **Q.** Who monitored it?
22 **A.** We took it in turns. We had an SSC monitor
23 monitor.
24 **Q.** Was that one person a day or a shift?
25 **A.** Yeah, a day.
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1 **Q.** Who developed it?
2 **A.** I think John Simpkins probably did most of it
3 but then, if other people had good ideas of how
4 things could be monitored, they got sort of
5 added into it. It was more monitoring of the
6 back-end systems, not the counters themselves
7 although, obviously, banking transactions, and
8 so on, were going all the way through the
9 system.
10 **Q.** When you say monitoring of the back-end systems
11 are you referring to POLFS there?
12 **A.** No, I'm --
13 **Q.** You're referring to Fujitsu back-end systems?
14 **A.** Fujitsu back-end systems.
15 **Q.** So how did it operate? What was its coverage?
16 **A.** I cannot remember any -- much detail at all. It
17 was just wherever there was a useful source of
18 information, perhaps, for example, about the
19 number of debit card transactions going through,
20 they would have a response code on them to say,
21 if it had been a successful payment or
22 otherwise, we could monitor how many were going
23 through a particular point in the system with
24 some sort of failure/error code. And if it
25 exceeded a certain threshold, then it would go
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1 red instead of green and that would encourage
2 somebody to see what was going on.
3 **Q.** So it was essentially a sort of pattern
4 analysis?
5 **A.** Yeah, for that particular instance.
6 **Q.** Can you help us, other than failed debit card
7 transactions, what, if anything, else it picked
8 up?
9 **A.** Banking transactions, which were actually
10 a separate system. I can't now remember the
11 details, I'm sorry.
12 **Q.** There wasn't such a system before 2007; is that
13 right?
14 **A.** Not sort of trying to pick up problems before
15 anybody had reported to them -- them to us in
16 some other way, yeah.
17 **Q.** But, in any event, the system didn't itself
18 proactively identify all bugs, errors and
19 defects?
20 **A.** Not at all, no.
21 **Q.** Was Fujitsu essentially reliant on, therefore,
22 a problem occurring within the live estate
23 causing a discrepancy or a loss, and the
24 subpostmaster raising it through the NBSC or the
25 Horizon Support Desk?
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1 **A.** We had all the reconciliation reports that ran
2   overnight, so that was the main way of finding
3   financial inconsistencies on the system.
4 **Q.** So there was the reconciliation reporting
5   system?
6 **A.** Yes.
7 **Q.** Did it nonetheless remain the case that the
8   majority of bugs were picked up through
9   subpostmaster initiated action?
10 **A.** Um, I mean, obviously there were problems to be
11   investigated throughout the whole system, all
12   the back-end stuff as well, but if we're talking
13   specifically about counter balancing problems,
14   which were only a very small proportion of the
15   overall calls that we were handling, um, then
16   I would say it was probably about 50:50
17   inconsistencies being reported by -- on the
18   reconciliation reports or branches reporting
19   that they had a problem in a particular area.
20 **Q.** You said that counter balancing was only a small
21   proportion?
22 **A.** Oh, yes.
23 **Q.** But it was a very significant issue for the
24   subpostmaster concerned --
25 **A.** Yes, of course.

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1 **Q.** -- potentially?
2 **A.** Yes.
3 **Q.** Did you realise that at the time, did you
4   acknowledge that at the time, that the
5   consequences for a subpostmaster may be very
6   extreme indeed?
7 **A.** I don't think we -- certainly, as I think I said
8   yesterday, I didn't realise initially that --
9   how -- really how the Post Office subpostmaster
10   structure worked and that they were financially
11   responsible. Obviously, some of problems would
12   have been at the bigger Crown branches, which
13   Post Office were responsible for. And there was
14   always this huge difficulty in distinguishing
15   where a problem is caused by something in the
16   system and the -- certainly more than just
17   a possibility that it is caused by some
18   inaccuracy of processing at the branch itself,
19   the user input.
20 **Q.** Did you and others in the SSC treat counter
21   balancing issues any differently because of
22   a recognition that the consequences for
23   a subpostmaster may be very direct and personal?
24 **A.** I don't think that would mean that we would
25   necessarily give it -- you know, sort of put it

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1   to the very top of the heap. You could argue
2   that it's actually extremely important that
3   a branch or a whole series of branches can
4   trade. If they're not able to trade, that is
5   also -- has serious consequences for all of
6   them.
7   If the entire estate can't do banking
8   transactions that obviously also has a severe
9   impact on the whole estate and so, to some
10   extent, I think those type of problems may have
11   been seen as more important -- not more
12   important but would possibly require faster
13   action than a discrepancy call from a single
14   branch.
15   I mean, I do see now that, yes -- I am well
16   aware of the impact that these problems have
17   had. But it was so hard to distinguish between
18   business issues and potential system issues, and
19   we would look for every possible sign of
20   a system issue. But if there wasn't one,
21   without knowing what had actually taken place at
22   the branch, you can't do more.
23 **Q.** Would your view have been different as to the
24   relative importance accorded to bugs, errors and
25   defects that may have affected the ability of

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1   the system to continue to trade, ie financial
2   issues, on the one hand, and issues that may
3   affect the continued employment or suspension,
4   civil proceedings against, criminal
5   investigations and criminal proceedings against,
6   subpostmasters, on the other, if you had known
7   more about how the Post Office had treated the
8   subpostmaster contract as meaning that
9   subpostmasters were responsible for all losses?
10 **A.** Yes. I feel we should perhaps have been warned
11   if the result of us looking at a single call
12   over a single day, or whatever, was going to --
13   could result in action being taken against
14   a postmaster with, I don't know -- I don't know
15   how much extra investigation was ever done.
16 **Q.** In the early days, say between 2000 and 2006,
17   did you not realise, therefore, that the
18   conclusions that you reached, the nature of the
19   investigations that you undertook that preceded
20   them and which you wrote up on a PEAK, could
21   result in the next day a subpostmaster being
22   suspended and locked out of their branch?
23 **A.** No, I don't think we did realise that.
24   I assumed there would be a huge amount more
25   investigation and double checking of the figures

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1   and everything else.
2 Q. Double checking by whom?
3 A. I assume people in Post Office would be doing
4   that.
5 Q. Can we turn to Bug 1, please, the payments and
6   receipts mismatch bug. Can we start with my
7   sort of summary of it. Would you agree with the
8   following summary of the bug: firstly, it was
9   a Horizon Online bug that occurred in 2010?
10 A. Yes.
11 Q. Secondly, it occurred when a subpostmaster tried
12   to roll over a stock unit with a discrepancy?
13 A. Yes.
14 Q. Thirdly, the system would ask the subpostmaster
15   if they wanted to transfer the discrepancy to
16   the local suspense account?
17 A. Yes.
18 Q. If the subpostmaster cancelled the rollover, the
19   discrepancy was zeroed from the location cache
20   but nothing was written to the branch database?
21 A. Yes, I believe that's true.
22 Q. If the subpostmaster then tried to roll over,
23   the stock unit would be rolled with the corrupt
24   local cache missing the discrepancy?
25 A. Yes.

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1 Q. That would therefore create a receipts and
2   payments mismatch?
3 A. Yes. Although I think that receipts and
4   payments mismatch wasn't actually picked up
5   until the end of the following period.
6 Q. The issues that I would like to explore with
7   you, please, are, firstly, why it appears that
8   only significant action was taken in relation to
9   this bug from September 2010 onwards when,
10   firstly, the PEAKs in relation to it had been
11   raised in February 2010 and, secondly,
12   Mr Jenkins appears to have been aware of the bug
13   in May 2010 when he noticed a Windows NT event;
14   and then, secondly, what was done to ensure that
15   all branches that may have been affected by the
16   bug had been properly identified.
17 A. Right. I've got several things to say in
18   response to that. Firstly, from everything I've
19   seen about this bug, I was not involved in the
20   investigations in September. So, really,
21   everything I'm going to say is based on what
22   I have read since. I have no memory of it.
23   I haven't seen any evidence that suggests it
24   was -- that it did occur before September.
25   I know there were couple of receipts and

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1   payments events which Gareth flagged, and
2   there's an email about that earlier in the year,
3   and there was also at least one other problem
4   that occurred during the HNG-X pilot, which was
5   roughly the first six months of 2010. But they
6   were different underlying causes and I'm not
7   aware that this specific problem, which resulted
8   in a receipts and payments mismatch had been
9   seen or reported before September.
10 Q. That's a very helpful general answer. Can we
11   look at material then, the chronology of events.
12   There are about ten steps in the process that
13   I would like to ask you about, but there are
14   about another 20 steps in the process but I'm
15   going to ask other witnesses about those or
16   suggest that they're adequately established
17   through the documents themselves.
18   Can we start, please, with FUJ00081064. Can
19   you see that this is PEAK 0194381.
20 A. Yes.
21 Q. It was opened on 10 February 2010?
22 A. Yes.
23 Q. You can see from the summary "Counter APP"; what
24   does "APP" mean?
25 A. Application?

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1 Q. Total receipts £250,016.45, total payments
2   £200,016.45. Then if we see from the first
3   entry that summary is included, so a £50,000
4   discrepancy; do you see that?
5 A. Yes.
6 Q. So this is showing a mismatch, is this right --
7 A. Yes.
8 Q. -- between receipts and payment --
9 A. Yes.
10 Q. -- of £50,000?
11 A. It's reporting a mismatch, yes.
12 Q. Now, I don't think you, as you have said, ever
13   became involved in this PEAK, so far as I can
14   see; is that right?
15 A. I can't remember unless I go down the --
16 Q. Yeah, if the operator could just scroll through,
17   please, you'll see I think your name doesn't
18   appear on it.
19 A. Okay. So it's been sent off to GDC, who are
20   providing fourth line support.
21 Q. Yes, and if we scroll down, please, I think we
22   can see that your name is not on it.
23 A. Yes, okay, I do now remember this. I mean --
24 Q. This document?
25 A. I remember seeing this document before. Yes.

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1 **Q.** We can see, if we go back up to the top of the
2   first page, that this becomes
3   "KEL ballantj1759Q"?
4 **A.** Yes.
5 **Q.** We can see that under the "All references"
6   section, yes?
7 **A.** Yes.
8 **Q.** Can we look then, at "KEL ballantj1759Q", that
9   is POL00029425. This was created, we can see,
10   by your colleague John Ballantyne on 12 February
11   2010 --
12 **A.** Yes.
13 **Q.** -- and last updated by you on 17 May 2011?
14 **A.** Yes.
15 **Q.** The way a KEL is written, you can't actually
16   tell what Mr Ballantyne originally wrote and
17   what you changed subsequently; is that right?
18 **A.** You can't see on here. The old ones were kept
19   but I've no idea if they still exist.
20 **Q.** So the text on here, we can't see what was his
21   work and what's your work?
22 **A.** No, no.
23 **Q.** I don't suppose you now recall what changes you
24   made?
25 **A.** I may recognise some of my --

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1   you wouldn't have been seen, in any event,
2   because when we look at a document, you
3   disappear.
4 **SIR WYN WILLIAMS:** That's all right, then. That's
5   fine.
6 **MR BEER:** The solution is set out:
7   "SMC/counter eventing team: raise a B
8   priority call and send to SSC if you see this
9   event, unless it is from a training counter ...
10   "SSC: Instances of this error must be
11   investigated. If the error is as a result of
12   a new problem, please add the details to the
13   list of causes above.
14   "The branch accounts may need to be
15   corrected. See [another KEL] for advice on how
16   this has been done for a previous problem."
17   What do you understand "The branch accounts
18   may need to be corrected" to mean?
19 **A.** I don't know now and, when I covered this in my
20   witness statement, I hadn't seen the "wrightm"
21   KEL. I have now and it doesn't cast any light
22   on it so I'm sorry but I don't know why that's
23   there.
24 **Q.** You made a point in your witness statement
25   I would need to see "wrightm". We're going to

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1 **Q.** Your style?
2 **A.** -- style, but I'm not sure.
3 **Q.** You'll see it cross-refers, in about the tenth
4   line there, back to the PEAK we just looked at,
5   yes?
6 **A.** Yes.
7 **Q.** If we scroll down, please, it states the
8   problem:
9   "This event is generated when the payments
10   and receipts totals do not match on one of the
11   counter balancing reports. This indicates
12   a software error or data corruption."
13 **A.** Yes.
14 **Q.** So it continues:
15   "[This] has been caused in the past by ..."
16   Then three possibilities are set out, yes?
17 **A.** Yes, yes.
18 **SIR WYN WILLIAMS:** I'm sorry to interrupt you,
19   Mr Beer, but I've had a message to say that I'm
20   no longer on the screen. I'd just like to
21   assure anybody who is looking that I'm still
22   here and the problem with me being on the screen
23   is being seen to.
24 **MR BEER:** Yes, thank you, sir. We're going to be
25   looking at lots of documents at the moment so

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1   look at the "wrightm" KEL in a moment.
2 **A.** Yeah.
3 **Q.** So you don't understand what that means?
4 **A.** Unless it's to -- referring to the corrective
5   action that may or may not have been taken for
6   the September bug, where they pressed cancel at
7   a certain point.
8 **Q.** Who was this direction to correct the branch
9   account addressed to?
10 **A.** It's saying it to SSC, I believe, but don't
11   think I -- I'm just about certain I did not put
12   that in there. So I'm not entirely clear why it
13   is there.
14 **Q.** By what method would you identify which branch
15   accounts need to be corrected?
16 **A.** Once you had a full understanding of the
17   specific problem and its consequences.
18 **Q.** By what method would they correct the branch
19   accounts?
20 **A.** It would depend to the problem and its
21   consequences.
22 **Q.** In your witness statement -- no need to turn it
23   up -- paragraph 66, you say:
24   "Post Office would have been informed of
25   each instance. I am not sure whether this was

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1   via a BIM or some other route. Fujitsu would
2   not have contacted branches directly unless the
3   branch had raised the call in the first place."
4   By that, are you saying that the Post Office
5   would have been made aware of each of the
6   individual cases where this issue affected
7   a subpostmaster or are you saying that the Post
8   Office would be informed that there was
9   a systemic problem?
10 A. Um, as I said, when I wrote this section I was
11   working a little bit blind, given that I had no
12   direct involvement with this. We wouldn't have
13   told Post Office about the office snapshots
14   problem. Actually, they probably were told
15   about it because everything in the pilot was
16   closely monitored, but the office snapshot one
17   there, that was false reporting of a receipts
18   and payments mismatch because it didn't take the
19   transfer into account.
20   Obviously, the stuff that had to be done for
21   the September problem was a major problem, which
22   was all followed through at the time.
23 Q. Followed through by?
24 A. I wasn't involved but I believe you've got some
25   more documents about it.

1   Q. So in that passage in your witness statement, in
2   which you said, "Post Office would not have been
3   informed of each instance" -- sorry, "would have
4   been involved (sic) of each instance", you're
5   not sure whether this was via a BIM report or
6   some other route, "Fujitsu wouldn't have
7   contacted the branches directly unless the
8   branch had raised the call in the first place."
9   Is that essentially a reflection of the
10   division of approach that you described to us
11   yesterday, ie what determined whether or not you
12   contacted a branch or not?
13 A. Yes. I believe so.
14 Q. Ie it depended on whether the branch had
15   initiated the issue?
16 A. Yes.
17 Q. Can we turn then to the wrightm...J KEL that you
18   said in your witness statement you needed to
19   look at. That's FUJ00081608.
20   This is the wrightm33145J KEL --
21 A. Yeah.
22 Q. -- that we saw referred to in the KEL that you
23   had last updated on 17 May 2011.
24   You'll see that this KEL is not raised until
25   23 September 2010 --

1   A. Yes.
2   Q. -- which is seven and a half months -- I hope
3   I've got the maths right on this occasion --
4   since the PEAK that we were looking originally
5   at 10 --
6   A. Yes, but that original PEAK was the office
7   snapshot problem, not the same problem that
8   happened in September.
9   Q. Why do you restrict the previous PEAK to only
10   the office snapshot problem?
11 A. I don't. It was originally raised for the
12   office snapshot problem but then when there were
13   other issues that could cause receipts and
14   payments mismatches, it was useful to include
15   them on there so that somebody subsequently
16   checking that same error message could see what
17   had happened in the past and what was -- and it
18   did say if any new problems come in with this is
19   symptom, it will need to be investigated again.
20 Q. So the sentence that we saw in the ballantj KEL
21   can't have included originally the
22   cross-reference to there is KEL --
23 A. No --
24 Q. -- because this KEL didn't exist at that time --
25 A. No, of course not.

1   Q. -- when it was written?
2   Okay, we'll come back and look at this KEL
3   in detail at a moment. If we just go back to
4   the chronology, then, because this isn't raised
5   until September. I just want to see what had
6   happened in the interim. Can we look at
7   FUJ00081062, please. This is an email chain,
8   I think, all dated 6 May, certainly the part
9   that I wanted to refer to. If we look at the
10   bottom of the page, please. Thank you. If we
11   scroll up so we can see who it's from and to.
12   Thank you.
13   It's from Mr Jenkins to you on 6 May 2010,
14   yes?
15 A. Yes.
16 Q. Was subject line of "Receipts payments
17   mismatches"?
18 A. Yes.
19 Q. He says that he's noticed NT counter events
20   which look like receipts and payments
21   mismatches?
22 A. Yes.
23 Q. Yes? Why was he emailing you?
24 A. Because I was a useful person who would know
25   what was going on in SSC and could check whether

1   calls had been raised for them.
2 Q. Sorry, could check?
3 A. Whether a PEAK call had been raised for these
4   two instances.
5 Q. Why would Mr Jenkins contact you in particular,
6   rather than the other 24?
7 A. Because I was a helpful person.
8 Q. More helpful than anyone else?
9 A. Probably.
10 Q. Okay. He continues "Jon", and who is that?
11 A. Jon Hulme, who was, I think, in charge of the
12   counter development team at that point.
13 Q. "... that there were also raised from the Office
14   Snapshot erroneously ..."
15   I think should that read "that these were
16   also raised from the Office Snapshot
17   erroneously"?
18 A. Probably.
19 Q. "... but that PEAK [and a number is given] was
20   fixed in [a fixed code] which should be Live."
21 A. Yes.
22 Q. "Have you been made aware of these or had any
23   calls? I don't know if there is a KEL for SMC
24   to pick up any such events and raise calls --
25   there certainly ought to be ..."
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1   Can you help us, what is an NT counter
2   event?
3 A. When the counter application would check at
4   various points at the end of the balancing
5   process to make sure that receipts and payments
6   were equal and, if they weren't, it would flag
7   that in various ways. One of the ways it
8   flagged it was by creating an NT counter event,
9   which would be written to the application event
10   log, which was one of the files we were talking
11   about yesterday.
12   Actually, no, now we're on HNG-X, it was
13   very slightly different with the file that had
14   the events in, I think. But anyway, it's the
15   same sort of thing. And these events would have
16   gone from the counter through the Tivoli stream
17   to be -- hopefully to be monitored for and
18   checked by the SMC, whose job was to look for
19   these sort of events or any other unexpected
20   events.
21 Q. He, Mr Jenkins, says in his last line there that
22   he doesn't know if there's a KEL to pick up such
23   events and raise calls. Now, there was, of
24   course, a KEL.
25 A. Yes.
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1 Q. We know that there was the KEL ballantj1759Q?
2 A. Yes.
3 Q. Why would Mr Jenkins not know about a KEL that
4   had been in existence, by my calculations, three
5   months by that time?
6 A. His job was not support. He didn't necessarily
7   use the KEL system. He wasn't responsible for
8   raising them or particularly using them.
9 Q. What was the Development team's access rights to
10   KELs?
11 A. He wasn't, strictly speaking, part of the
12   Development team but, yes, the Development team
13   had access to the KELs.
14 Q. What was Mr Jenkins's access rights to the KELs?
15 A. I don't know. I can't now remember if he did
16   have access to them or whether he -- it was just
17   easier to ask me, probably.
18 Q. He speaks, essentially, of a system being made
19   or needed to raise calls. What's that
20   a reference to?
21 A. Well, part of the process of looking out for
22   this type of error was that SMC would -- were
23   meant to be monitoring for this type of error,
24   and, if they saw one, then they should raise
25   a call -- it wasn't PowerHelp by then, but
                              75

1   whatever it was -- which would then get passed
2   on to PEAK for SSC to investigate.
3 Q. At the top of the page you reply, copying
4   Mr Parker in. You say:
5   "Gareth.
6   "... there is a KEL [then you give the
7   reference] which tells the SMC to raise a call
8   if they see this event.
9   "I haven't noticed any calls (but I haven't
10   been doing that sort of call recently). I do
11   have a PM-raised call from a few weeks back
12   which I need to look at (the mismatch was only
13   for a few pence so it has gone to the back of
14   the heap)."
15   Was there a heap --
16 A. Yes.
17 Q. -- ie a mountain of unresolved systems issues
18   that you had to work your way through?
19 A. Er, yes, we were very, very busy at this time
20   during the HNG-X pilot. HNG-X was being used at
21   about -- I can't remember if it was 250 or 500
22   branches and, as you'd expect for any new
23   system, despite having gone through very
24   expensive testing, once you let several hundred
25   branches have a try, they found paths that
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1   couldn't have been gone through during the test
2   process.
3   So I can't remember what other sort of call
4   I had been doing but, yes, I had been busy. The
5   postmaster-raised call, I think I say in my
6   witness statement, I shouldn't have left it that
7   long, even if it was only for a few pence, but
8   it would have been -- the effect on the branch
9   wasn't significant but it definitely needed
10   looking at and it hadn't just been closed down.
11   It was waiting.
12 Q. Were any of these receipts and payments
13   mismatches picked up by the reconciliation
14   process?
15 A. No, because the events were now being used
16   instead of the reconciliation process for this
17   specific type of error.
18 Q. But, on this occasion, it was a postmaster who
19   had raised the mismatch, not the NT events?
20 A. The call that was on my stack, which I have no
21   memory of now and haven't had sight of, was
22   raised by the postmaster, yes.
23 Q. Was that the case, that even though Fujitsu
24   systems were supposed to pick up things like
25   this, errors were often flagged for the first

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1   time by a subpostmaster?
2 A. Um no, I don't think that is usual. I mean,
3   I don't know now whether there had been
4   a SMC-raised call for that call that was on my
5   stack which hadn't then been linked with it.
6   I haven't got that information.
7 Q. Can we move forwards, please, and look at PEAK
8   PCO203864, which is at FUJ00081586.
9   If you see, this was a PEAK raised on
10   2 September 2010 and it concerns a mismatch of
11   a smaller amount of money, £11.20.
12 A. Yes.
13 Q. Yes?
14 A. Yes.
15 Q. Can we turn, please, to page 2 and look at your
16   entry for 18.52.00?
17 A. Yes.
18 Q. You say:
19   "Joe, this is important because it means
20   that their accounts don't net to zero due to
21   some sort of system error -- not user error.
22   Similar to a receipts and payments mismatch.
23   Garrett had a call about a problem with
24   incomplete summaries recently, worth checking
25   whether that was the same branch."

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1 A. Yes.
2 Q. What are you referring to there?
3 A. You mean the problem with incomplete summaries?
4 Q. Yes.
5 A. That was this reconciliation report which
6   reported on any branches where the day's
7   transactions didn't net to zero. So the branch,
8   if it was the same branch, they might have had
9   that problem one day and then, at some point in
10   the future when they did their balancing then --
11   and produce their branch trading statement, then
12   this situation that this call is about with the
13   trading position not being zero would be
14   reported and I can't remember if that was on one
15   of the reconciliation reports or if it was
16   an event again.
17 Q. Did you think here is a version of the payments
18   and mismatch bug that we saw earlier in the year
19   doing its work again?
20 A. No, I don't think so because I thought -- we're
21   missing some evidence here. The earlier
22   problems, we know about the wrongly reported one
23   during the office snapshot. Nobody has shown me
24   the PEAKs that were subsequently raised for
25   those two events that Gareth reported. I am

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1   absolutely certain that, him having flagged it
2   up, that would have been followed up on pretty
3   quickly. But we haven't got those calls for me
4   to look at to give you any explanation of.
5   So, as far as I was concerned, when I saw
6   this call coming in, I found it alarming. Not
7   because I knew there was already a problem in
8   this area but because it looked like there might
9   be something new.
10   At this point, September 2010, the rollout
11   of HNG-X to the entire estate was in progress.
12   I'm not sure how far through it had got but now,
13   instead of a few hundred branches, we are now
14   probably onto several thousand branches, with
15   the opportunity to find some new error paths,
16   and so on. So I was obviously concerned that,
17   yeah, we've got a problem here and it wasn't
18   because I knew of existing problems. I thought
19   it was quite likely that there was a new
20   problem.
21 Q. Can we go then to the KEL that we looked at
22   earlier, FUJ00081608. Looking at the top, we
23   can see that it was raised by Mr Wright on
24   23 September 2010 but was last updated by Cheryl
25   Card on 1 April 2016, both SSC members; is that

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1   right?
2 A. Yes, and there have been ten versions of it.
3 Q. Yes. We're looking at the tenth version. It
4   describes the receipts and payments mismatch bug
5   rather well, so if we can just read it together
6   under "Symptoms":
7   "When a clerk balancing the stock unit the
8   rollover screen is eventually displayed, and the
9   clerk then presses the Preview or Print button
10   produce the Trial Balance ... The counter then
11   returns to the rollover screen.
12   "Having checked the report, the clerk then
13   presses the Rollover button, and in normal
14   circumstances is given the choice of rolling to
15   a new Balance Period or a new Trading Period.
16   "If the clerk chooses to roll to a new
17   [Trading Period], the net discrepancies are
18   present, then the system asks whether the clerk
19   wishes to transfer the net discrepancy to local
20   suspense, or else cancel the rollover ...
21   "If the clerk presses Cancel, the system
22   returns to the rollover screen and he/she can
23   press Print or Preview or Rollover or Cancel
24   back to the Stock Balancing menu."
25   Then there's a reference to another KEL.

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1   If we read the solution at the foot of the
2   page. A reference data fix was released in
3   November 2010 under a PEAK, and the number is
4   given:
5   "Now that the fix has been deployed, if
6   Cancel is pressed on [number given] then the
7   discrepancy is not cleared.
8   "A Workaround (prior to fix):
9   "If the Clerk presses Cancel on [message
10   number given], then to avoid the bug they must
11   press Cancel again to return to the Stock
12   Balancing menu.
13   "Unfortunately the workaround cannot be done
14   after the problem has occurred at the office!
15   In this case the branch accounts will need to be
16   corrected.
17   "Please advise branches to continue rolling
18   over stock units and the office as normal. It
19   is not necessary to wait for the correction to
20   be applied before rolling into a new TP."
21 A. Yes.
22 Q. The workaround suggests, is this right, that
23   that was applied in the period before November
24   2010, before the fix was released?
25 A. The workaround is really just saying which

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1   button the clerk would need to press to avoid
2   the problem. You didn't read through the
3   problem section on the screen, which is actually
4   where it describes the sequence of button
5   presses that got you into this situation. But,
6   yeah, the workaround was no good unless you were
7   very well aware of what was going to happen.
8 Q. So it's not really a workaround at all, is it?
9 A. No, no.
10 Q. Because it couldn't be done after the problem
11   had actually occurred?
12 A. No.
13 Q. So it's not a workaround at all?
14 A. It's not a workaround, no.
15 Q. That's because it would always be the case that
16   the problem would come to light after the
17   occurrence in the office?
18 A. Yes.
19 Q. So, is this right: until the fix was applied,
20   Fujitsu were relying on subpostmasters to call
21   in? That was essentially the only step that was
22   being taken?
23 A. Um --
24 Q. There was nothing proactive done?
25 A. I cannot remember. I wasn't involved, but

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1   I think, in all the various documents that we've
2   seen, there was a lot of talk with -- between
3   Fujitsu and Post Office as to how to sort this
4   out, to resolve any discrepancies. In fact, in
5   this case, the branch were losing their
6   discrepancies, so they made a loss. This
7   actually lost their loss. If they made a gain,
8   they lost that as well.
9   But I believe, but it's in a lot of this
10   other documentation somewhere, that steps were
11   taken by Fujitsu to find all occurrences of this
12   problem and then with Post Office to decide what
13   to do about them.
14 Q. What about this: as you rightly said, the
15   problem section of this KEL described a sequence
16   of button presses by a subpostmaster resulting
17   in this receipts and payments mismatch, yes?
18 A. Yes.
19 Q. What about sending a notice out to all
20   subpostmasters saying, "We've got a bug in our
21   system, don't cancel rollovers when you've got
22   a discrepancy because it will cause a receipts
23   and payments mismatch"?
24 A. Yes, um --
25 Q. A bit like a sort of product safety recall or

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1   a warning notice to everyone that's using
2   a system, "We've got something wrong with our
3   system. Don't do this, otherwise it will cause
4   an issue"?
5 A. That would have possibly caused more confusion
6   at 12,000 branches than the problems caused at
7   the -- I can't remember how many it was but
8   I think it was fewer than 100 that were actually
9   affected by the problem. But, yes, that would
10   be something to consider doing. But that would
11   be up to Post Office to communicate to the
12   branches.
13 Q. Were you ever aware of such a discussion
14   occurring in relation to this issue, this bug,
15   or any other bug, "Let's tell people" --
16   relatively simple on this occasion -- "don't
17   cancel rollovers when you've got a discrepancy"?
18 A. That would cause more confusion because they
19   would not want to roll over with a discrepancy
20   that they disagreed with, so you would have to
21   word it very carefully and there was a way of
22   them cancelling -- it was just a very specific
23   point that they had to not continue to avoid --
24   or, sorry, not cancel to avoid the problem. It
25   wasn't the only way they had of backing out to

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1   of the process.
2   Sorry, to get to your question --
3 Q. What about the broader issue --
4 A. Yeah, um --
5 Q. -- of accepting that there's a problem with the
6   system and telling the subpostmaster community
7   about it?
8 A. Yes, I cannot definitely remember. That would
9   not have been up to Fujitsu to make that
10   decision. We had no means of communicating
11   directly with all the subpostmasters. Post
12   Office could send messages that would appear on
13   the screen at the start of day but that was
14   totally within their control as to what they
15   were -- wanted to communicate with their
16   postmasters.
17 Q. I'm not suggesting, let me be clear, that this
18   should have been something that Fujitsu took on
19   itself to do.
20 A. Mm.
21 Q. It was a service provider to a client. I'm
22   asking whether you were aware in your 16 years
23   of ever any discussion about that occurring,
24   "Rather than correcting things behind the scenes
25   and not telling subpostmasters about them, we

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1   actually say there's a bug in the system"?
2 A. Um, I can't remember. I wasn't usually involved
3   at discussions at that sort of level for
4   problems that would affect a significant number
5   of branches.
6 Q. In your witness statement, paragraph 54, you
7   say:
8   "I am asked whether there were any written
9   or unwritten practices, policies or procedures
10   to restrict what information about a bug or
11   potential bug could or would be shared with
12   others, either for limited periods or
13   indefinitely. I was not aware of any such. If
14   I spoke to a postmaster about a problem and
15   I identified it had been caused by system error,
16   I would say so."
17   Again, the revelation to a subpostmaster of
18   a system issue was dependent on you speaking
19   directly to the subpostmaster.
20 A. Yes.
21 Q. I think you told us earlier that that happened
22   very infrequently in your 16 years?
23 A. No, I said what happened very infrequently was
24   making corrections to the branch financial data.
25   I certainly would have spoken to postmasters

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1   most weeks, perhaps not quite as often as that.
2   It would depend on the sort of calls that I was
3   handling, but, yes, it wasn't that unusual to
4   speak to a postmaster.
5   It wouldn't always be to say there was
6   a system problem because sometimes I would be
7   speaking to them for some other reason.
8 Q. Was there any guidance or policy on whether or
9   not you should reveal to subpostmasters system
10   faults with the Horizon System?
11 A. No, I was never given any guidance on that.
12 Q. It was a matter of individual discretion for
13   you?
14 A. Yes, but I and my colleagues certainly would
15   say -- I would hear them on the phone talking to
16   postmasters and I've seen quite a few PEAKs, and
17   so on, where it says, "Spoke to the postmaster,
18   explained it's a system problem". So that was
19   being done.
20 Q. Given that you have just said that you did it
21   and you were aware of other colleagues in SSC
22   sitting near or around you doing it, how did
23   that sit with what we discussed earlier: the
24   Post Office's reluctance to reveal system
25   errors, as you described it?

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1 **A.** Yes, that seemed to be the policy that they took
2   on some of these bigger issues that were
3   affecting more branches. But within SSC, we
4   were never, ever trying to hide the fact that
5   there were system problems.
6 **Q.** Can we turn, please, to POL00028898. This is
7   PEAK 0204765. You'll see that it's opened on
8   25 September 2010. The summary is, having given
9   the branch code and a message number, "non-zero
10   trading position on office rollover".
11   If we look at page 2, please. Scroll down
12   to the entry for 15.16.30, an entry by your
13   colleague Cheryl Card. She says:
14   "The problem occurred on [15 September] when
15   stock unit 02 rolled over. This was originally
16   reported as per [the KEL that we've read] in
17   call [then a PEAK number is given], but for some
18   reason the call was closed without being
19   investigated.
20   "There is a known problem with the use of
21   the Cancel button during stock unit rollover.
22   This is fully described in [the other KEL we
23   looked at]. A fix is currently being worked
24   on."
25 **A.** Yes.

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1   certain lengths of time to resolve the financial
2   side of it. But no, I mean this was presumably
3   raised as a C priority by the helpdesk, unless
4   anybody changed the priority subsequently. That
5   didn't mean that SSC wouldn't pick it up quickly
6   and investigate it.
7 **Q.** So the priority status didn't affect the
8   priority with which the SSC dealt with the PEAK?
9 **A.** No, not necessarily.
10 **Q.** What was the purpose of attributing a priority
11   status?
12 **A.** If it was a priority, it would definitely be
13   looked at quickly, but that doesn't mean that
14   the rest Cs went to the back of the heap,
15   necessarily. Obviously something with
16   a non-zero trading position would be looked at
17   fairly quickly, I would think. I can't see how
18   quickly it was given to Cheryl, unless you
19   scroll down.
20 **Q.** I think she first picked it up on the 27th.
21 **A.** Right.
22 **Q.** If we scroll to the second page.
23 **A.** Yeah.
24 **Q.** I think her first entry is on the 27th. Scroll
25   down, please.

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1 **Q.** Then if we go over the page, you'll see from the
2   second entry from the top, the call has been
3   assigned to Mr Jenkins on 27 September, for
4   advice on how to correct the branch accounts.
5 **A.** Apparently, yes.
6 **Q.** Can you assist, why was this still occurring?
7 **A.** Because the fix hadn't been made yet.
8 **Q.** If we go back to page 1, if we look at the call
9   status at the top, the "Priority" status at the
10   top, it's described three lines from the top on
11   the right-hand side as "Non-critical", yes?
12 **A.** Yes.
13 **Q.** If a PEAK was given this status, "C --
14   Non-critical", was that taken into account in
15   a service level agreement with the Post Office
16   when working out penalty clause thresholds of
17   payments by Fujitsu to the Post Office?
18 **A.** I don't know.
19 **Q.** Were you aware of a service level agreement
20   which contained essentially liquidated damages
21   thresholds, depending on the status of calls as
22   between A, B and C?
23 **A.** I don't think so. Only in as far as I said
24   yesterday: I knew that some -- priority
25   financial calls did have to be done within

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1 **A.** That's so -- well, yes. Yes, so -- and without
2   knowing which day of the week it is and so on,
3   but yes. So it came into SSC on the 25th and
4   then the investigation started on the 27th, by
5   the look of it.
6 **Q.** If we go to the third page, please, and look at
7   the third entry down:
8   "The branch accounts will need to be
9   corrected. PEAK [and then a number] has been
10   sent to development for advice as to how to
11   correct the accounts."
12   Then do you see there's some text copied in
13   and, amongst other things, the severity given
14   there is as critical?
15 **A.** That's the severity of the event. These have
16   been -- these two entries are from the NT
17   events, which are being monitored centrally.
18 **Q.** Why might an NT event that has been attributed
19   the severity of "critical" be assigned priority
20   status C, of "non-critical"?
21 **A.** Because when the call was raised, it wasn't
22   actually raised for one of these events.
23 **Q.** Would not the fact that this NT event had been
24   recognised to be linked to the call that had
25   been made a cause of recategorisation of

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1   priority?
2 A. It might have made sense for somebody to have
3   increased the priority of this bug from C, but
4   we can see, from all the other documents and
5   calls that were coming in with this problem,
6   there were a lot of people working on it by now.
7   It was not one little C priority call at the
8   back of the heap with people at the helpdesk
9   adding things to it and nobody looking at it.
10   The investigation was well under way.
11 Q. I'm going to skip over much of the
12   correspondence, documents and emails from
13   September, October and November 2010 concerning
14   the bug and its revelation to the Post Office,
15   because they mainly concern Mr Jenkins' actions.
16   But can we go, please, to a document from
17   mid-November 2010, FUJ00081214. This is
18   a series of emails. Can we start, please, with
19   the third page. Just look at the bottom of the
20   second page to see who it is from and to.
21   From Antonio Jamasb, a Post Office employee,
22   the branch IT service manager, to Saheed Salawu
23   in Fujitsu. Did you know him or her?
24 A. Him. He might have been Steve Parker's boss at
25   this point.

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1 Q. Sorry, I missed that.
2 A. He might have been Steve Parker's boss at that
3   point, but I'm not at all sure.
4 Q. If we scroll up a little bit, we can see
5   Mr Salawu's sign-off block in his signature. So
6   you can see what his role was.
7 A. So Service Delivery Manager. So I was wrong
8   about him being Steve's boss.
9 Q. Anyway, going back to the text of Mr Jamasb's
10   email:
11   "... I have a conference call on Monday with
12   senior stakeholders within POL.
13   "I need a full update for Receipts and
14   Payments.
15   "I need:
16   "Up-to-date spreadsheet of branches affected
17   and what the discrepancy is.
18   "Up-to-date list of branches/counters yet to
19   have fix.
20   "Any calls logged with HSD re issue.
21   "A summary from Fujitsu stating why we have
22   no other integrity issues with Horizon, and why
23   we couldn't see this issue.
24   "Sorry to drop this on you."
25   In relation to the fourth of Mr Jamasb's

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1   requests or demands, would you agree that that's
2   a reasonable question for a customer to ask
3   their contractor?
4 A. It would be a difficult question to answer,
5   possibly. I've no idea. I wasn't involved, as
6   far as I'm aware, in this investigation at the
7   time.
8 Q. But would you agree, stepping back, that this is
9   a reasonable reassurance for a customer to seek?
10 A. I think it's a reasonable reassurance for
11   a customer to seek.
12 Q. Asking "Please tell us, Fujitsu, why we have got
13   no other integrity issues with Horizon?" Part
14   one.
15   Part two: "Why was it we couldn't see this
16   issue?"
17   Can we go to -- scrolling up, please,
18   Mr Salawu forwards it to some others within
19   Fujitsu. Can you help who they were, Mike
20   Woolgar and Neneh Lowther?
21 A. I think they were other what's obviously called
22   a Service Delivery Manager at this point.
23 Q. Second paragraph:
24   "I know Mike was running with this but there
25   should be information that can answer the

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1   queries. It's a good test of how effective our
2   update process works."
3   Then scrolling up still further. Mr Woolgar
4   emails Messrs Simpkins and Jenkins:
5   "... are you able to provide answers to the
6   questions from POL ... yesterday?"
7   He will deal with the third one and then go
8   to page 1, please. Mr Jenkins reply, he adds
9   Mark Wright in, who I think would have been your
10   manager by then or team leader.
11 A. He was my team leader, yeah.
12 Q. Mr Jenkins says:
13   "I think it is Mark from SSC that has been
14   running with this rather than John.
15   "Attached is an email he sent to POL with
16   an update yesterday. I think that addresses
17   points 1 and 2 ...
18   "As for point 4, then that is probably down
19   to me. In simple terms I don't think we can
20   make such a statement."
21   You'll remember what the request was, "Can
22   Fujitsu tell us why we have no other integrity
23   issues with Horizon and why couldn't we see this
24   issue?"
25   He says:

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1   "I don't think we can make such
2 a statement."
3   He continues:
4   "What we can do is check through what known
5 integrity issues we have and also make the more
6 general statement that when integrity issues
7 arrive, then they do leave a trail enabling them
8 to be identified and their scope to be
9 ascertained.
10   "John/Mark: are you aware of any other
11 integrity issues we have not yet fixed? I can't
12 think of any off the top of my head."
13   At this time, would you have answered the
14 question in the same way as Mr Jenkins? That
15 you couldn't say that there are no integrity
16 issues with Horizon?
17 A. Yes, I don't think I -- I think I would have
18   answered it in the same way. I said earlier
19   I thought it was a very difficult question to
20   answer, and I -- yes, I would go along with what
21   he says.
22 Q. In relation to what else he said, would you
23   agree that the best that could possibly be said
24   was that there were, in fact, known integrity
25   issues with Horizon?

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1 A. Well, it's to check through what known integrity
2   issues we have.
3 Q. Yes.
4 A. Yes.
5 Q. Would you agree that, when an integrity issue
6   shows itself, it leaves a trail?
7 A. Yes.
8 Q. So you would have answered this in the same way?
9 A. I think it was way above my pay grade to be
10   answering that type of question.
11 Q. So returning to the issues, then, it seems that
12   significant action was taken in relation to the
13   bug in September 2010; is that right?
14 A. As far as I know. I wasn't involved.
15 Q. You have, I think, answered my question already
16   that PEAKs had been raised from February 2010
17   onwards and your answer to the question "Why
18   wasn't action taken in relation to those PEAKs",
19   was that they concerned a different issue.
20 A. I think it's highly likely that they concerned
21   a different issue. We have not seen it, so
22   I cannot say definitively either way.
23 Q. But Mr Jenkins appears to have been aware of
24   this bug, a receipts and payments mismatch bug,
25   which caused the Windows NT 902 events from

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1   May 2010?
2 A. No, he was aware of -- that there could be
3   various causes of receipts and payments bugs.
4   We haven't seen anything that links those two
5   that he flagged with the same -- with the
6   receipts and payments particular issue caused by
7   the "prev" button.
8 Q. In relation to the hundred or so branches that
9   you mentioned earlier --
10 A. I've no idea how many it was. It would be --
11   it's written down somewhere.
12 Q. To your knowledge, what action was taken
13   proactively to tell them of the existence of
14   this bug?
15 A. I don't know.
16 MR BEER: Thank you. Can we move to the Callendar
17   Square/Falkirk bug.
18   It might be a good opportunity to take
19   a break and reconvene at 1.50, sir?
20 SIR WYN WILLIAMS: By all means, yes, that's fine.
21   So 1.50, thank you very much.
22 MR BEER: Thank you very much.
23 (12.48 pm)
24   (The Short Adjournment)
25 (1.50 pm)

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1 MR BEER: Sir, good afternoon can you see and hear
2   me?
3 SIR WYN WILLIAMS: Yes, I can, thank you.
4 MR BEER: Thank you very much.
5   Good afternoon; Mrs Chambers. Can we then
6   turn to the Callendar Square/Falkirk bug, Bug 2.
7   In very simple terms, an explanation of the bug
8   could be as follows, would you agree with it:
9   firstly, it was a big that afflicted Legacy
10   Horizon?
11 A. Yes.
12 Q. It started in about 2000?
13 A. Yes.
14 Q. It was caused by a lock in the Riposte software?
15 A. Yes.
16 Q. You give helpful information in slightly more
17   detail in your witness statement, which I'd ask
18   to be turned up, in paragraphs 73 and 74, which
19   are on pages 23 and 24. In 73 you say:
20   "Within the SSC we referred to the
21   underlying problem as the Riposte Lock problem."
22   That's instead of the Callendar Square or
23   Falkirk bug?
24 A. Yes.
25 Q. "Normally Riposte messages were automatically

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1 replicated between counters so each counter held
2 an identical set of all transaction and
3 reference data relating to that branch. But
4 occasionally one counter would fail to accept
5 any messages from other counters. This usually
6 seemed to be triggered by something early in the
7 declaration or balancing process. Repeated
8 application events were generated which were not
9 visible to the user. The event storm and
10 failure to replicate ..."
11   Just stopping there, what do you mean by
12 "the event storm"?
13 **A.** The repeated application events. Every few
14 seconds the same event was generated and we
15 referred to that as a storm.
16 **Q.** "... would persist until the counter was
17 rebooted or ClearDesk was run?"
18   What was ClearDesk?
19 **A.** That was the process that ran at some points in
20 the early hours of the morning to restart the
21 counter application.
22 **Q.** Thank you. Then over the page to 74:
23   "The counter would still be able to serve
24 customers but would appear to be working
25 normally, but anything done on other counters

1 after the event started would not be visible.
2 Reports printed on the counter would not include
3 transactions done on other counters so those
4 transactions might be re-entered. Incorrect
5 discrepancies could be reported if the money was
6 in the till but the transactions weren't
7 included in the balance. Transfers between
8 stock units might be accepted in twice, causing
9 a discrepancy and a receipts and payments
10 mismatch. Single counter branches could not
11 have this problem."
12   That can come down, thank you. The issues
13 I would like to explore with you, so you know
14 where we're going, are firstly exploring the
15 explanation for what was done to address the bug
16 in the early 2000s; when Fujitsu was first aware
17 that the Riposte lock could cause a balancing
18 issue; who was aware of that issue; why it was
19 allowed to remain outstanding until 2006; and
20 did the fix, known as S90, work fully.
21   Okay? So if we can just go through the
22 chronology of those events and try to pick it up
23 as we do.
24 **A.** Yes.
25 **Q.** Again, this isn't a complete chronology, there

1 are about 15 documents that I want to ask you
2 about but there are a very large number of
3 additional documents and steps in the
4 chronology. Can we start, please, with
5 FUJ00017986. This is a PinICL, 00127251, and
6 you'll see that it was opened on 2 July 1998.
7 **A.** Yes.
8 **Q.** The opening summary at the top left-hand side is
9 "Riposte error: Failure to get lock".
10 **A.** Yes.
11 **Q.** I appreciate this before your time by couple to
12 years, in the SSC but, looking through this
13 PinICL, is it right that this appears to be
14 early evidence of the Riposte lock?
15 **A.** It is an instance of a single Riposte lock
16 error. There's no mention in there of repeated
17 events, which were the -- it was when you got
18 the repeated events that you might then also
19 have additional problems -- it might then affect
20 the replication. One single event, we never had
21 any evidence that that caused any long-term
22 problems.
23   I'd also say that I don't believe this is
24 anything to do with the counter software.
25 I don't think it was this process.

1 "B_LD_CD_DEL" looks like one of the bulk loaders
2 that would have been running on one of the
3 Horizon back-end systems.
4 **Q.** So following from that, if we look at the last
5 few entries on page 4, if we look at six lines
6 up, Mr Bell's entry:
7   "I have not seen this problem since the test
8 rig was updated to Riposte 216.
9   "Also the network has been changed so I'm
10 closing this call."
11   Does that tend to suggest that because the
12 problem was not seen as at 5 October 1998, the
13 PinICL was therefore closed as an isolated
14 example?
15 **A.** Yes, it was an example of a single Riposte error
16 which -- I can't tell from this but there's no
17 evidence that this one single error -- and, you
18 know, you do get errors and your systems have to
19 cope with this. There may be a good reason why
20 it failed to get the lock and it reported it.
21 So it's an instance of that particular error
22 message, and, yes, they didn't see any more of
23 it on the test rig, so they closed the call.
24 **Q.** When you and other SSC staff, much later or many
25 years later on, were investigating the extent of

1   the Riposte lock bug and the duration of it,
2   would this kind of PinICL have been available to
3   you?
4 **A.** I don't recall how long PinICLs were kept for.
5   It might have been there but, looking at that,
6   it bears absolutely no relevance to a counter
7   balancing problem found some years later.
8 **Q.** So if you had had access to it, you would have
9   dismissed it as irrelevant?
10 **A.** Yeah, as --
11 **Q.** Can we move forwards then, please, to
12   FUJ00031913. We're now on 5 November 1999, so
13   again before your time, but it's another PinICL
14   opened concerning another Riposte lock, yes?
15 **A.** Yes, it is, which happened at a particular time
16   of day for a particular process.
17 **Q.** Reading through the PinICL, would you agree that
18   it appears that the SSC took no substantive
19   action in relation to the lock and, instead, it
20   was simply closed on 11 November 1999?
21 **A.** Assuming it's closed further down, it was
22   something -- ClearDesk failed to create training
23   object, that is the overnight processing
24   starting things up again, it's trying to create
25   something to do with the separate training
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1   service that ran on the counter. It got, it
2   looks like, a single timeout message and also
3   this "error occurred" message. It doesn't show
4   any lasting ongoing problem. It wouldn't affect
5   replication in any way, so if it was just
6   closed, I'm not surprised.
7 **Q.** You're not surprised it was just open and closed
8   very quickly?
9 **A.** Yeah.
10 **Q.** Can we move forwards, then, to the year 2000,
11   FUJ00059049. You were in post by this time?
12 **A.** I'd been there about three weeks, I think.
13 **Q.** Yes. We'll see that this is a KEL raised by
14   Mr Ballantyne on 2 November and then closed by
15   you in 2005?
16 **A.** Not closed: last updated.
17 **Q.** Sorry, last updated by you. If we see the
18   "Solution", please, further down the page.
19 **A.** Yes, could I just say, sorry, before we go down,
20   this -- where they're getting the error messages
21   committing the discrepancies, and so on, this
22   suggests that the underlying problem which is
23   happening, it's not just preventing the
24   replication between counters; it's actually
25   a problem on this counter itself, where Riposte
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1   is trying to write messages into the message
2   store on this particular counter and it's not
3   able to do so.
4 **Q.** So I'm not following for the moment what the
5   point is or the distinction you're making.
6 **A.** I think when I described the problem in my
7   witness statement I said the problem was the
8   failure to replicate messages from -- that were
9   being done on one counter onto this counter that
10   they were balancing on.
11   This particular description, which I don't
12   think I'd had the opportunity to remind myself
13   of when I wrote that, it's clear that they are
14   doing the work on this one counter and then,
15   when, in the balancing process, it's trying to
16   write the declarations and the discrepancies
17   into the message store, it's unable to do that,
18   presumably because this lock is held and so it
19   can't write into its own message store.
20 **Q.** So this could afflict a single counter; is that
21   what you're saying?
22 **A.** It possibly could, yes, but because it can't
23   commit or do any of these things, you're
24   actually not going to be able to complete your
25   balance process on the counter in the state that
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1   it's in at the moment anyway. But yes, it --
2   reading it now, I think it might affect a single
3   counter.
4 **Q.** I see. In terms of the solution, just reading
5   the "Solution" to yourself, is it right that in
6   essence the solution was to advise a restart by
7   the subpostmaster and to stop balancing if they
8   were doing the balance?
9 **A.** That is the solution that was being given at
10   that time, yes.
11 **Q.** How long was that solution to stop balancing and
12   restart?
13 **A.** That was for a long time because it took until
14   2006, I think, for us actually to get a fix for
15   the problem.
16 **Q.** So was that the operative advice for about
17   a six-year period?
18 **A.** Yes, it would have been.
19 **Q.** Can we look, please, at the PEAK to which this
20   KEL is associated, 0056922, and the PEAK is
21   FUJ00070841. Now, again, you're in post by this
22   time but for a very short period of time. I'm
23   not showing you the PEAK because you're
24   mentioned in it. It's another in the line of
25   documents evidencing the existence of the bug.
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1   Can we look at page 4, please, at the foot
2 of the page, and Mark Jarosz's entry at
3 10.35.00, thank you. He says:
4   "My assessment of what happened is that on
5 Wednesday 1st Nov at 18.32.13 a lock was
6 acquired on the run table which was not
7 released. This had the subsequent effect of
8 causing [I think that's 'many'] Riposte API
9 calls to fail and hence the applications
10 connected to Riposte could not function
11 reliably. I would speculate that the probable
12 cause was a thread silently failing but we have
13 no way of proving this.
14   "I will check with Escher to confirm my
15 assessment is reasonable and if not further
16 update this PinICL.
17   "In the meantime I would recommend that in
18 future occurrences a restart of Riposte should
19 be attempted prior to rebooting NT.
20   "If the frequency of occurrence of such
21 an event becomes significant ([more than] 1 per
22 month) then we will need to create
23 a reproducible case."
24   Can you explain what you understand
25 Mr Jarosz to be saying there?

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1 A. Jarosz. Some process has failed but it's not
2   being picked up, he doesn't know what that will
3   be. I don't think I can explain that very
4   clearly, technically. He was going to check
5   with Escher, who owned the Riposte code, because
6   this was the underlying product that Horizon was
7   built around, which Fujitsu didn't support,
8   and --
9 Q. The last point I'm interested in particularly:
10   if the frequency of occurrence becomes
11   significant, which he defines as meaning more
12   than once per month, "we'll need to create
13   a reproducible case".
14 A. Yes, so if it keeps happening more than once
15   a month, then we're going to have to see if we
16   can reproduce the problem, which actually we
17   never managed to do.
18 Q. Who would monitor whether such incidents,
19   concerning the Riposte lock, were occurring at
20   a rate of greater than or less than once per
21   month?
22 A. I'm not sure that anybody was monitoring that at
23   that point.
24 Q. How would the proposal or conclusion or outcome
25   that Mr Jarosz has arrived at there be carried

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1 into effect then, or wouldn't it?
2 A. I don't know.
3 Q. If nobody was monitoring the frequency with
4   which such events occurred, it couldn't be,
5   could it?
6 A. No, it couldn't. I don't know if any of my
7   colleagues back then, who were aware of this
8   problem, took it upon themselves to do such
9   monitoring but I certainly didn't do it, because
10   I hadn't been there very long and wasn't really
11   aware of this problem at that point.
12 Q. More generally, was there a system within the
13   SSC of logging disparate PinICLs and PEAKs
14   together so that some sort of meta analysis
15   could be carried out?
16 A. Not to my knowledge. I don't know if that's
17   something that the SSC manager did have any --
18   did have any systems in place for, but I'm not
19   aware of that.
20 Q. Were you ever required or requested to
21   contribute to such a system, either in its
22   design or providing data to it?
23 A. There certainly were occasions when I would do
24   my own checks for similar calls happening. But
25   I don't recall it being something that I was

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1   ever instructed to do.
2 Q. So there was nothing to stop one PEAK coming in
3   to one person in the SSC and another coming in
4   to one of the other 24 people in the SSC about
5   the same subject matter, and person 1 not
6   knowing about person 2's PEAK?
7 A. That could happen. I mean, what we did
8   sometimes do is, on the KELs say "Record further
9   instances here", so then we did get a bigger
10   picture but that wasn't part of the process that
11   anybody told us to do.
12 Q. It was a bit hit and miss, I think it's fair to
13   say?
14 A. It could be hit and miss, yes.
15 Q. So when one looks at the KELs, one doesn't see
16   a list of all the associated PEAKs?
17 A. You would on some KELs for particular problems.
18 Q. But not on many others?
19 A. Not on many others.
20 Q. Were you conscious of this within the SSC at the
21   time, thinking "I'm working my way through my
22   heap, my stack of tickets, I'm getting them in,
23   dealing with them, getting them out, and there
24   could be somebody else who's working a different
25   shift to me, somebody home working", I don't

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1   know -- probably not home working in the SSC --
2 **A.** (Unclear).
3 **Q.** -- but working a different shift, working on the
4   other side of the room, "and they could be
5   exploring precisely the same problem and we
6   don't know about it"?
7 **A.** That is possible. Certainly if it was the
8   same -- at the same point in time, we'd almost
9   certainly notice just because you would be
10   keeping an eye on the other calls that were open
11   and you would see if somebody had a similar
12   call, or the pre-scanner would say, "Ooh, I've
13   just given one that looks like this to so and
14   so", but if they were, you know, several weeks
15   apart you would not necessarily make those
16   links.
17   Having said that, in -- certainly, we did
18   talk to each other, and so we often did have
19   a pretty good idea of other things that were
20   happening so you would get some sort of an idea
21   of, you know, "Oh, there's another one of those
22   sort of problems", but it wasn't being formally
23   measured or managed.
24 **Q.** There was no system in place?
25 **A.** No.

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1 **Q.** Can we look, please, at one of your KELs at
2   POL00030325. This was a KEL, "AChambers330S",
3   raised by you about a month into your time, yes?
4 **A.** Yes.
5 **Q.** On 27 November 2006, last updated by Mike
6   Croshaw on 20 October 2006. If you scroll down,
7   please, looking at, without reading them out,
8   the "Symptoms" and the "Problem", this looks
9   like another similar example of the Callendar
10   Square bug, doesn't it?
11 **A.** The KEL was originally raised for -- very
12   specifically just for a single occurrence of the
13   event at particular point in processing during
14   the LFS end of day processing, when it wouldn't
15   have affected -- that's not part of the counter
16   balancing process. Where it goes on to say
17   "sometimes a storm of these events occurs", that
18   that is later what we have called the Callendar
19   Square bug.
20 **Q.** The Riposte lock?
21 **A.** Yes.
22 **Q.** It said under "Solution" that:
23   "A single event can be ignored.
24   "Do not pass further instances to SSC unless
25   there appear to be side effects."

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1   Why was the KEL signed off in this way?
2 **A.** Because a single event is just "Oh dear, Riposte
3   has had a slight problem, it's obviously
4   recovered from it", in that we only have the one
5   event, we haven't got ongoing problems. So if
6   there don't appear to be any side effects, then
7   it doesn't need any further investigation.
8 **Q.** Was there a concern that too many issues were
9   being sent up to the SSC?
10 **A.** I'm not aware of that particular statement in
11   that particular KEL causing that particular
12   problem.
13 **Q.** But the KEL is meant to discourage, isn't it,
14   passing instances up to the SSC?
15 **A.** If just single event has occurred.
16 **Q.** Wouldn't you want to know where single events
17   had occurred if they were occurring as single
18   events across the estate?
19 **A.** Not if they -- um ...
20 **Q.** Wouldn't that help identify the problem?
21 **A.** It might have done if there was a problem caused
22   by these events being raised. I realise we're
23   getting into a state where -- a chicken and egg
24   situation here. But, yes --
25 **Q.** I'm going to ask you about the chicken and egg

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1   situation in a moment.
2 **A.** Yes, I certainly wasn't trying to -- I don't
3   believe that KEL has been written in that way to
4   necessarily stop anything being sent to SSC for
5   any of these events. It was more written in the
6   first place for the single event, I believe.
7 **Q.** But this is addressed to HSH, isn't it, the
8   solution, to the Helpdesk?
9 **A.** Yes, it is, saying a single event can be
10   ignored.
11 **Q.** Was there sufficient skill and expertise within
12   the Helpdesk team to identify whether or not
13   a call related to a single event or was, in
14   fact, one of a series of events?
15 **A.** You could --
16 **Q.** How would they know?
17 **A.** Because when -- if HSD or SMC were monitoring
18   the events, they would see each event coming in
19   as a separate entity from a specific branch.
20 **Q.** What a branch calling in?
21 **A.** No, this isn't a branch 'phoning in, this is the
22   automatic feed they get through Tivoli of the
23   events, the NT events that are being raised on
24   the counter.
25 **Q.** How would those lower levels of support identify

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1	if there were what is described as "side
2	effects"?
3 **A.**	Um, if further processes started raising other
4	events, if we're talking about the events, you
5	know, you might get one event saying, you know,
6	that a lock is held, and then other processes
7	might then generate events because they couldn't
8	do what they were meant to be doing. I mean
9	a lot of events were being raised all the time
10	from a lot of different processes, not that many
11	critical events. There were different
12	categories of events. But we certainly didn't
13	expect every single event being raised by the
14	system always to be individually investigated.
15 **Q.**	Whether or not it required to be individually
16	investigated or not, wouldn't it be important
17	knowledge for the SSC to have, as to the
18	existence of these individual events, as you
19	called them?
20 **A.**	Quite honestly, I don't think we would have been
21	able to do anything about them, except to look
22	at it and say "Well, we can't see that it's
23	caused any knock-on event on any other counter
24	process". The only thing that perhaps it might
25	then have had to go off to Escher again to say,

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1	"Can you investigate why these are getting
2	these?" But you do get unexpected errors
3	happening on systems. Systems have to be
4	written in a way where they can cope with
5	unexpected errors at this sort of level.
6 **Q.**	Some of the errors were causing what you've
7	described as side effects and some were not.
8 **A.**	Um, I'm not sure if we ever -- I'm -- yes, it's
9	hard, very hard now, to go back and say -- you
10	know, if we had investigated a single event, we
11	would have had to have looked at the bigger
12	picture of which other processes had been
13	impacted. Certainly this one, just after
14	midnight, during LFS end-of-day processing,
15	it -- I think that one possibly did affect some
16	counters that night, sorry, but not the
17	balancing just the LFS process, which didn't
18	affect branch balancing in any way. I don't
19	think I can add much more here.
20 **Q.**	Okay, can we look at version 2 of this KEL,
21	please, which is FUJ00059141?
22 **A.**	Which version was this that we were looking at?
23 **Q.**	This is version 1 we're looking at the moment.
24	If we scroll up, we can see the top of it. Now
25	we're looking at version 2.

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1 **A.**	Right, so that.
2 **Q.**	Scroll up. That's version 1.
3 **A.**	Version 1 must have been the update by Mike
4	Croshaw in 2006.
5 **Q.**	Yes.
6 **A.**	Which is confusing but the KEL system changed
7	I think at that point and that's why it went
8	back to version 1, so there would have been
9	earlier versions as well. I think.
10 **Q.**	Okay, I'm not going to explore that any further.
11	Can we go to version 2 then. Again, it shows
12	correctly the first date that you raised this
13	KEL, 27 November 2000, and we can see that this
14	version 2 is last updated by your manager
15	Mr Parker on 14 June 2010. Can we take from
16	that that this is confirmation that these
17	lock-type problems were continuing to be
18	experienced throughout the time that Riposte was
19	in operation?
20 **A.**	Firstly, I'd say I'm wondering if that's some
21	sort of administrative update, given that we
22	were just about to go live on to HNG-X in 2010
23	at that point, and go fully live.
24	Um, I think we very occasionally did
25	continue to see just a single event at odd

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1	times, but not the event storms that were
2	happening during the balancing process, which we
3	saw up to 2006.
4 **Q.**	Again, was there any method by which that data,
5	from which I've called a meta analysis, could be
6	conducted, was retained?
7 **A.**	Well, all the events were retained, somewhere,
8	for some length of time.
9 **Q.**	Yes. In a system but not being looked at.
10 **A.**	Yes.
11 **Q.**	I'm asking whether anyone -- where a bug was
12	identified like this, whether anyone in SSC or
13	elsewhere, for example in order to go to Escher
14	to say, "Look this is a continuing problem",
15	retained dataset that they could go to Escher
16	with and say, "This is a continuing problem it's
17	been going on for 10 years".
18 **A.**	I know that in 2006, after the fix for the event
19	storms went live, I did monitor for some time
20	after that to see if the event storms stopped
21	and the event storms did stop, but there may
22	have been the very, very occasional single event
23	still happening. But it was the storms that
24	seemed to cause the message store either not to
25	replicate or it not to be possible to write to

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1   them. Otherwise, if you've just got a single
2   problem the processes would retry and it would
3   work on the retry.
4 Q. Can we turn, please, to FUJ00083548. This is
5   an email exchange between Mr Jenkins and Mark
6   Jarosz and Brian Orzel. If we just read through
7   the message at the top of the page together,
8   from Mr Jenkins:
9   "I've had a look at this event log and
10 I don't think there's anything to really worry
11 about. Migration appears to have completed OK
12 and the outlet is running fine on CI4."
13   Was that a release, CI4?
14 A. Yes, I believe so.
15 Q. "I've seen number of 'verification failures'
16 during migration before and I believe that they
17 are to be expected during the various loads of
18 Riposte before the counter reboot.
19   "However, I'm curious as to why we get the
20 three errors mentioned in the PinICL. They
21 occur at 20.26 on 9/11/00. All are identical:
22 Facility MessageProcessor ... Error 94 'An error
23 occurred while attempting to destroy
24 a checkpoint run. Timeout occurred waiting for
25 lock'. They seem to occur during the Riposte
                          121

1   index rebuild immediately after the migration of
2   the 'real' message store. I assume that they
3   are benign, but would appreciate confirmation
4   from Mark before closing the PinICL."
5   I'm not going to look at the rest of the
6   message. For this kind of thing that Mr Jenkins
7   was doing, would you know that this kind of
8   thing was going on, ie the things that he is
9   describing?
10 A. Well, he's referring to a PEAK, 57478, and
11 mentioning three identical errors. I don't
12 think that's the PEAK that we were looking at
13 before.
14 Q. It's not, no. It's a separate one entirely.
15 A. Right, so I think this is a different problem
16 that we're looking at here. But a different
17 problem but, yes, again, you've got the same
18 underlying --
19 Q. The same underlying cause?
20 A. -- event --
21 Q. Yes.
22 A. No, not the same -- not necessarily the same
23 underlying cause but the same events have been
24 generated and in this time it's during the phase
25 of the index rebuild, and this is looking like
                          122

1   it's part of the migration. So when branches
2   are first moving on to Horizon. So, yes, some
3   Riposte errors were looked at.
4 Q. Can we move on, please, to FUJ00083574. Look at
5   the message in the middle of the page, again
6   from Mr Jenkins. Different PinICL, 57957. He
7   says:
8   "This PinICL is related to 56922 which you
9   looked at couple of weeks ago."
10   That's not the one that we were just looking
11 at. This is a third one.
12 A. This looks like we're back to a problem in the
13 LFS space, which is what that KEL of mine was
14 talking about.
15 Q. Yes, and he says:
16   "I've had a look through the message store
17 and the event log and have noticed that at the
18 time of this failure [12.02 am, essentially]
19 that there is an LFS background task running."
20 A. Mm.
21 Q. He says, next paragraph:
22   "I suspect that it is significant that the
23 Riposte error is 10 secs after the BLOB is
24 written ..."
25   What was the BLOB?
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1 A. I think it was a Binary Large Object.
2 Q. What does that mean?
3 A. A big amount of data that was so big that it had
4   to be written into a whole set of messages. It
5   was too big to fit into one individual message.
6 Q. He then says, next paragraph:
7   "As the PinICL says, this seems to be
8   happening fairly frequently."
9   Yes?
10 A. That's what it says, yes.
11 Q. Next paragraph:
12   "I do think we need a definitive statement
13 from Drew ..."
14   Do you know who Drew was?
15 A. No.
16 Q. "... as to whether this event is benign or what
17 problems we could have when it happens. Could
18 it be due to an application error? Do we need
19 to get more info on when these problems occur.
20 It is clear that the circumstances in this case
21 are very different from those in the original
22 PinICL."
23   To your knowledge at this time, we're late
24 November 2000, was this problem happening fairly
25 frequently?
                          124

1   A.   I don't know. I would say again, this isn't the
2   problem with the repeated events that was
3   affecting balancing.
4   Q.   The reply at the top of the page, Mark Jarosz
5   says:
6   "From your description [Gareth] it sounds as
7   though we potentially have a recipe for
8   a reproducible case."
9   Can you assist us with what a reproducible
10   case is?
11   A.   One where you could try the same process and
12   reproduce and make the problem happen in
13   a consistent way.
14   Q.   What would be the purpose of forcing the problem
15   to occur?
16   A.   Well, if you can reproduce it then you stand
17   a much better chance of, firstly, finding the
18   root cause and, secondly, being able to test to
19   show that you have fixed the problem.
20   Q.   Can we move forwards, please, to FUJ00083583.
21   We can see Mark Jarosz's reply to Mr Jenkins of,
22   I think, 1 December 2000. It must be
23   an Americanised date, I think.
24   "Hi Gareth,
25   "I can confirm (having checked with Drew)
                              125

1   "Following critical event generated on
2   various FADs ..."
3   That's by various branches, is that right,
4   or about various branches?
5   A.   Yes, at various branches, not raised by various
6   branches.
7   Q.   Yes, about various branches, thank you:
8   "The call summary is now:
9   "Many 'run map' critical events on various
10   [branches].
11   "Response:
12   "These events were investigated in the past
13   ..."
14   You give a PEAK number.
15   "But the call was closed on the basis that
16   the errors were no longer occurring.
17   "Analysis of the events in the last month
18   shows 2,132 of these events. In many cases
19   there is just one, or a small number on
20   effective counters, but [and then you give
21   a branch number] generated over 900 in one day,
22   and 191323 over 100 [presumably 100 days] ..."
23   A.   No, that would be 100 events.
24   Q.   Over 100 events?
25   A.   Sorry, that's -- the "191323" is a branch code,
                              127

1   that a timeout of this sort is likely to be
2   benign in the sense that it should not result in
3   a message store corruption."
4   "At this stage, can you remember whether you
5   in the SSC were told about this investigation
6   having taken place?
7   A.   I have no recollection of this and, again, we're
8   still talking about problems in the area of the
9   LFS agent, which is nothing to do with counter
10   balancing.
11   Q.   So at the moment would you draw a distinction to
12   say this isn't really directly relevant to the
13   bug that we're looking at?
14   A.   Yes.
15   Q.   Therefore, you didn't need to know about it?
16   A.   Personally, probably not, no. There was
17   an awful lot to learn about when I first
18   started, as you can imagine.
19   Q.   Yes. Can we move forward a couple of years
20   then, please, and look at FUJ00083633. You'll
21   see that this is a PEAK, 0083563 opened on
22   7 November 2002 and can we look at your entry,
23   please, at 16.27.00, towards the bottom of the
24   page.
25   You say:
                              126

1   a FAD code.
2   Q.   I've got it. So there are two branches you're
3   referring to?
4   A.   Yes.
5   Q.   The first one generated over 900 in one day?
6   A.   Yeah.
7   Q.   The second branch over 100 in one day?
8   A.   Yes.
9   Q.   Thank you. I understand.
10   Then if you look down the rest of the PEAK,
11   the trail seems to go cold, nothing happens.
12   A.   Yes, I mean, I asked for the call to be raised
13   so that I could do some background investigation
14   into these events, which I had noticed, and
15   I was concerned about, because they were
16   happening. But there was a call that I sent to
17   Development or was sent to Development at around
18   the same time for them to investigate.
19   Q.   But there appears to be a four-month gap between
20   your entries of 7 and 8 November, and your entry
21   of 24 February?
22   A.   Yes. It was something I was doing as
23   a background task because I was concerned about
24   the events.
25   Q.   But what was happening in the meantime to these
                              128

1   two branches that you mention here?
2 **A.** I can't remember now if I looked -- I mean, the
3   branch -- the events would only have -- they had
4   happened on those particular days. The events
5   didn't keep having the same -- they didn't keep
6   affecting the same branches over and over again,
7   and whether I did look back to see if the events
8   had had any impact on the branches on those days
9   or whether they had raised calls to say they
10   were having issues, I now cannot remember.
11 **Q.** But if you had have done that you would have
12   noted it on this PEAK, wouldn't you?
13 **A.** Um --
14 **Q.** The branch you'd had at 900 events in one day
15   and the other branch you'd had over 100 events
16   in one day?
17 **A.** Um, yes. I mean these events didn't necessarily
18   mean that they did have balancing problems. It
19   just meant they could, in the majority of cases.
20   It didn't --
21 **Q.** You don't know until you look, do you?
22 **A.** That's true. And I don't -- I cannot say now
23   whether I did look at those at that point. It
24   may be that, you know, at this point -- I'm not
25   sure when we first realised that it was tending
                              129

1   to happen more when they were doing their
2   balancing and therefore it might have an effect,
3   but, yes, it obviously was important to look
4   and, as I say in my witness statement, I'm not
5   at all happy about how this was handled over the
6   years.
7 **Q.** When you say that, you mean by Fujitsu?
8 **A.** Yes, by Fujitsu, by SSC. By all of us. We
9   could have done better.
10 **Q.** In relation to your part in that, you made
11   a record on 7 November that, in the last month,
12   there were 2,132 of these events and you
13   highlighted two branches, one where 900 events
14   had happened in one day and another where over
15   100 events had happened. If you had
16   investigated whether any of those events had
17   caused discrepancies, you would have noted it
18   down on this PEAK, wouldn't you?
19 **A.** Yes, if they had been aware that there were
20   discrepancies, that they had persisted through
21   the event storm and had managed to balance and
22   it looked as if they did have discrepancies as
23   a result, then I probably would have recorded
24   it.
25   If I had looked and seen that either they'd
                              130

1   realised they'd had a problem, had phoned for
2   advice and had rebooted and then done their
3   balancing, I probably wouldn't have recorded
4   that. But since I didn't record anything,
5   I don't know.
6 **Q.** Were you essentially relying on subpostmasters
7   to spot a problem and call it in?
8 **A.** I certainly think at this time, with this
9   problem, we did assume that they would notice
10   that -- either that they were getting error
11   messages, as we saw in one of the PEAKs you just
12   showed me, where they got error messages because
13   they couldn't commit the declarations or
14   whatever else. So they'd definitely know they
15   had a problem in that case.
16   In other cases, we certainly did get some
17   where they phoned in and they said "We're
18   balancing, our figures are all over the place",
19   and then the Helpdesk would advise them to
20   reboot and then it would be okay when they
21   restarted.
22 **Q.** Can we move forward again, please, to look at
23   FUJ00083651. This is a PEAK, 0086212, opened on
24   24 January 2003. Can we look, please, at your
25   entry on 29 January at 11.31, which is on the
                              131

1   bottom half of the page, tab. You say:
2   "It looks as if there was a problem with
3   last week's balance -- cutoffs and some final
4   OBCS transactions were done on counter 3., then
5   balancing continued on counter 4, but this did
6   not seem to know what had been done on counter 3
7   (there were many underlying Riposte timeout
8   messages). The transactions were ended again;
9   I need to ascertain whether they were sent to
10   TIP twice and whether the postmaster is out of
11   pocket.
12   "Have spoken to [postmaster] who confirms
13   there were problems and is worried that they may
14   continue this week. I'll contact her tomorrow
15   am to see how they have got on."
16   So there you're essentially describing, in
17   a single paragraph, the operation of the
18   Callendar Square bug, as I have summarised it,
19   in existence on 29 January 2003.
20 **A.** Yes.
21 **Q.** Then if we can look at your entry a couple of
22   days on, 31 January at 16.09, you say:
23   "[Postmaster] balanced okay. She has
24   reversed the transactions which she had had to
25   reenter (the original ones were included in the
                              132

1   new CAP). This was all caused by counter 4
2   being unable to see messages recently written on
3   counter 3 when the stock unit was being
4   balanced.
5   "There is no accounting discrepancy here,
6   but there is a problem in that the [postmaster]
7   was allowed to balance with no warning that the
8   counters weren't communicating. MSU informed
9   that I'm sending this to [Development] for
10   further investigation."
11 **A.** Yes.
12 **Q.** So would you have informed the MSU here?
13 **A.** Yes, I would have informed MSU because this call
14   was not raised by the postmaster but because of
15   an entry on one of the reconciliation reports.
16   At this point in time, the cash account was --
17   so when the branch balanced, they did their
18   balance reports and then they produced a cash
19   account on the counter, but the cash account was
20   also reconstructed at the data centre from the
21   transactions that had been harvested -- had
22   reached the data centre, and a comparison was
23   done, line by line, to make sure the two were in
24   step. And in this case they weren't because the
25   data centre, when it did its recalculation, knew

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1   about these counter 3 transactions, which hadn't
2   been picked up when the branch cash account was
3   produced.
4   So there was a mismatch, and
5   a reconciliation call was raised to investigate
6   why that had happened.
7   So in this case, that's how we knew about
8   the problem. I did phone the branch to see what
9   had happened, you know, whether they had
10   realised there was a problem. They had put
11   these transactions in again, because they didn't
12   think they'd had them once, but then, because
13   the original transactions hadn't been included
14   in the accounts for the period that they'd just
15   balanced, they automatically got carried forward
16   and then were picked up in the new period.
17   So, in order to avoid them going through
18   twice, she was then able to do a reversal on
19   them, which sorted out her branch accounts. But
20   obviously, yes, there was still a system
21   problem.
22 **Q.** That's why you sent it to Development for
23   further investigation?
24 **A.** So I sent it to Development for further
25   investigation.

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1 **Q.** If we just go forward to complete the story on
2   this PEAK to page 4. Two years on, there's
3   a record at the top of the page, for 5 October
4   2005:
5   "This call is one of a set approved by ...
6   (Mik Peach) for closure without further action."
7   Was that because the fix was then thought to
8   be the S90 release?
9 **A.** I doubt it. I don't know. I'm not very happy
10   with that.
11 **Q.** Do you know --
12 **A.** Was there anything above that at all to say if
13   anybody had looked at it?
14 **Q.** You can look back, please, at page 2. I don't
15   think there's anything relevant in your entry on
16   3 February.
17 **A.** No.
18 **Q.** If you scroll to the bottom half of the page,
19   you'll see two customer calls. If you just read
20   those.
21 **A.** Oh, I think that just happened automatically
22   when -- was that when we moved from PinICL to
23   PEAK, or something changed and all the calls had
24   to be closed and everyone reopened and then
25   everything got written in again.

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1 **Q.** So nothing of substance there?
2 **A.** No nothing of substance.
3 **Q.** Then on to page 3?
4 **A.** No --
5 **Q.** Nothing there?
6 **A.** Yes, nothing there.
7 **Q.** Then bottom half of the page.
8 **A.** No.
9 **Q.** Nothing there?
10 **A.** No.
11 **Q.** It's just closed off, isn't it?
12 **A.** It was just closed off.
13 **Q.** Why are you unhappy or not very happy?
14 **A.** I'm unhappy with myself because I should have
15   made it something more than a C priority.
16   I left it at the priority that it had come from
17   MSU in the first place, and I should have
18   shouted a lot louder about the fact that this
19   needed looking at. As time went by, I got
20   better at shouting louder.
21 **Q.** Who would you shout to?
22 **A.** Oh, anybody who'd listen.
23 **Q.** Meaning who: Mr Peach?
24 **A.** Yeah, Mr Peach, Development team.
25 **Q.** So, in essence, this call is closed off without

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1   anything having been done on it for two years?
2 A. Yes.
3 Q. One way of describing that is suboptimal, isn't
4   it?
5 A. You could say that.
6 Q. Can we look at a different PEAK, please.
7   POL00000996, this is PEAK 0103864, opened on
8   3 June 2004. The "Summary":
9   "[Postmaster] reports that he had a problem
10   with some transfers."
11 A. Mm-hm.
12 Q. I think, without going into the detail, the PEAK
13   describes the problem where multiple transfers
14   in occurred to a stock unit?
15 A. Yes.
16 Q. Can we go forward to page 6, please. In the
17   middle of the page, 6 July at 11.47.27, you've
18   written:
19   "I've checked with Mike King; the BIMS
20   report for this problem was sent to POL on
21   [22 June] and should have result in an error
22   notice being sent to the branch. Mike says he
23   will send a note to POL saying that the
24   [postmaster] has been changing this issue; I've
25   asked [the helpdesk] to inform the [postmaster]
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1 A. Yes, I think so. I think further up the call,
2   Catherine had been dealing with it. She had
3   sent the information to Mike in MSU informing
4   Post Office of this discrepancy that the branch
5   should not be held liable for. The branch had
6   not held anything. They were chasing it back,
7   so the call ended up with me, so I followed it
8   up, as best I could, with Mike.
9 Q. Again, could we go forwards in the tale, please,
10   to 2005 -- sorry, 2006, and look at POL00030241.
11   This is a chain of email correspondence on
12   Calendar Square itself --
13 A. Yes.
14 Q. -- once the bug had seemingly been identified
15   and discovered within the Post Office. We
16   should just set the context by starting at the
17   foot of page 9 and on to page 10, with an email
18   from Sandra MacKay of POL, to Brian Potter of
19   POL. This is just to set the context for what
20   happens later in the chain. Can you see -- I've
21   said that's to Brian Potter. If we just go up,
22   it's Shaun Turner copied to Brian Potter. Just
23   trying to work out -- ah, yes.
24   Shaun says:
25   "Gary,
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1   that they should have received an error notice
2   and to check with the department that issues
3   them.
4   "The corrected cash account that was sent
5   still had a [receipts and payments] mismatch.
6   The double Transfer In causes a mismatch both
7   because of the transfer and because of the
8   discrepancy which has been erroneously
9   generated. The host-calculated [cash account]
10   ignores the transfer but is still affected by
11   the accepted discrepancy which should not have
12   been generated. It is not really possible to
13   provide a fully balanced [cash account] ..."
14   There's an email on this subject.
15 A. I think we discussed this one yesterday.
16 Q. Yes. You're recorded as dealing with the BIMS
17   here on 6 July 2004. Can you explain, please,
18   again, exactly what you're doing there?
19 A. Yes. I wasn't personally involved with the
20   BIMS. I checked with Mike, who was the person
21   who had sent the report to Post Office about the
22   discrepancy that shouldn't have happened at this
23   branch.
24 Q. So are you just identifying that there's been
25   a delay here?
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1   "Need your advice on this branch. There
2   appears to be an ongoing problem at this branch
3   with transfers between [stock units] causing
4   a receipts and payments mismatch. This first
5   came to my attention some 3 or 4 months ago,
6   when the branch was chasing up an error notice
7   to account for a loss that they had that was
8   related to the [receipts and payments] mismatch.
9   I believe in that case, that FS [Fujitsu,
10   I think] had taken it on board and were
11   investigating it as a problem (I seem to recall
12   it had a PinICL number). I had to do some
13   chasing around with P&BA [Products and Branch
14   Accounting] to ensure that the error notice got
15   issued, as there was a breakdown in processes
16   between them and FS relating to the BIM report.
17   "Since then it appears to have happened
18   again, although Fujitsu are saying no issue
19   could be detected. I am concerned that there is
20   a fundamental flaw with the branches
21   configuration, and would be interested to know
22   how [Fujitsu] put the ... issue to bed."
23   If we go further up on page 9 and on to
24   page 8, and if we just scroll gently up, we can
25   see that this gets passed around essentially
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1   within POL, yes?

2 A. Liz Evans-Jones was Fujitsu.

3 Q. So it goes over to Liz Evans-Jones from

4   15 February 2006, from Gary Blackburn:

5   "Liz

6   "I have had the incident below forwarded to

7   myself by our Service Line ... could you please

8   update me on the corrective action plan as this

9   still appears to be occurring within the

10   branch."

11   Then if we go further up to page 8

12   Ms Evans-Jones replies:

13   "I have checked the call and this issue

14   appears to have been resolved in S90."

15   Could you, in a word or two, explain what

16   S90 was?

17 A. It was a fairly major release of updated

18   software. I can't remember what functionality

19   it included, but there were new areas of

20   functionality coming in fairly frequently and

21   so, as a part of that, there would be some bug

22   fixes and this was scheduled to be one of them.

23 Q. So a scheduled software release?

24 A. A scheduled major software release, which would

25   have been through a very thorough test cycle.

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1 Q. It was proposed to include this fix within S90?

2 A. Yes.

3 Q. "S90 has already been deployed to the Datacentre

4   and counter release is scheduled to start", and

5   then there are some dates:

6   "3rd line support has been discussing with

7   the [postmaster], and the last contact with the

8   branch (according to PowerHelp) was on 1st Feb.

9   The call has been left open for 3rd line to

10   check to see if the issue reoccurs S90.

11   Please let me know if I can provide any

12   other assistance ..."

13   Then continue scrolling up, please, and

14   again, please. We can then see some passing,

15   essentially back down the chain, of Liz

16   Evans-Jones' reply within POL, yes?

17 A. Yes.

18 Q. On page 7, keep scrolling up. Thank you. If we

19   then just scroll down a bit so we can see it is

20   Mr Turner asking these questions. Thank you.

21   Shaun Turner, yes, and then just scroll back up.

22   Thank you.

23   He says, back to Mr Blackburn:

24   "Gary,

25   "Thanks for looking into this for us.

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1   Couple of questions occur:

2   "Do we understand why this particular branch

3   has been having problems? Or are there other

4   branches in the network that have been having

5   this problem?

6   "Could this branch be front ended on the

7   counted release of S90 such that it gets the fix

8   as soon as possible?

9   "The email from Liz suggests that there may

10   be a reoccurrence following S90. What degree of

11   certainty do we have that it will definitely be

12   fixed?"

13   So some pretty direct and pertinent

14   questions there from Mr Turner, yes?

15 A. Yes.

16   "Sandra/Brian -- Appreciate this is

17   frustrating for the branch but from the email

18   below you can see that the branch's issue should

19   be fixed for the release of the S90 software.

20   I have asked Gary above to see if we can put

21   this branch to the front of the queue ... In the

22   meantime it is important that the branch

23   continues to report any issues into [the

24   Helpdesk]."

25   So the four or five rather pertinent

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1   questions that Mr Turner asks, if we scroll up,

2   please. We then see these getting passed around

3   within Fujitsu. Keep scrolling, please. Keep

4   scrolling -- keep scrolling.

5   We can see an email from Mike Stewart to

6   Mr Simpkins, copied to you. Why were you copied

7   in?

8 A. I think because Mike says below, "As Anne is

9   away could I have your comments as you were

10   involved as well."

11 Q. That's saying why John is asked the questions,

12   but why is that addressed to you?

13 A. Well, before that, it's "Anne, you're always

14   a good place to start", so it was me being

15   a good place to start.

16 Q. I'm so sorry, why were you the good place to

17   start?

18 A. Because I knew what it was going on and because

19   I had to put an update on that call there that's

20   at the very bottom of the screen, so I'd

21   obviously had some involvement --

22 Q. With this bug?

23 A. -- with this bug, as far as I can see.

24 Q. If we scroll down we can see what Mr Stewart

25   asked. He cuts in his explanation of the

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1   position, yes?
2 A.   He's pasted in my update from PinICL there. And
3   then, where it says, "I notice", that,
4   I believe, is his words from that point.
5 Q.   Yes:
6   "I notice that in the early guise of this
7   problem in the call it states the PM as female."
8   Yes?
9 A.   Yes, that's what Mike's saying.
10 Q.   Then some more cutting and pasting.
11 A.   Yes, then --
12 Q.   Then back to him --
13 A.   -- that's what the helpdesk had put on the call,
14   yes.
15 Q.   "At the bottom of this email re a magical
16   [£43,000] appearing and disappearing the PM is
17   Male He reports", et cetera.
18 A.   Mm-hm.
19 Q.   Then scroll down, please. He says:
20   "Clearly the [subpostmaster] is concerned,
21   as we have just spent a number of months trying
22   to sort out the first instance and he doesn't
23   want a repeat performance. He is convinced that
24   there is something wrong with his Horizon kit.
25   I would be grateful if you could investigate

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1   this and give him any support you can. I'm due
2   to visit the office tomorrow to look at his
3   paperwork and discuss the situation ..."
4 A.   Again, isn't that again a cut and paste from
5   something that somebody in the Post Office had
6   said earlier in the chain?
7 Q.   I'm not sure that it is, I thought that was --
8 A.   I don't think Mike would have been visiting
9   offices.
10 Q.   No. I think you're probably right, then. Can
11   we go to your answer then, please, on page 3 of
12   this email chain. At the foot of the page. You
13   respond:
14   "Mike ...
15   "Haven't looked at the recent evidence, but
16   I know in the past this site had hit this
17   Riposte lock problem 2 or 3 times within a few
18   weeks. This problem has been around for years
19   and affects a number of sites most weeks ..."
20   Is it right that this Riposte problem had
21   been around for years?
22 A.   Yes, because we had been seeing it since at
23   least the end of 2000.
24 Q.   So five and a half, six years?
25 A.   Yeah.

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1 Q.   Your witness statement -- there's no need to
2   turn it up, I don't want to disrupt the
3   narrative -- says at paragraph 76, "[You]
4   personally had known about this Riposte lock
5   problem since soon after I arrived at the SSC in
6   2000", and that's a reference back to those
7   November 2000 PEAKs we looked at; is that right?
8 A.   Yes, although I think that when I wrote the
9   witness statement, I'm not sure that I'd
10   actually seen the dates on those but, yes, it
11   was a known problem.
12 Q.   So that reflects the early PEAKs that we saw of
13   November 2000 --
14 A.   I believe so.
15 Q.   -- and an early KEL that we saw of November
16   2000?
17 A.   Yes.
18 Q.   In relation to your part of the sentence which
19   says, "This affects a number of sites most
20   weeks", how did you know that it affects most
21   sites -- sorry, it affects number of sites most
22   weeks?
23 A.   Because of the event storms that we could see.
24   I would say that I think there -- it was
25   something that did seem to have increased, as

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1   time went by. I don't believe we were seeing
2   all these event storms several times affecting
3   many branches all the way through, although,
4   actually, since I wasn't necessarily checking,
5   I don't know. But when say it affects them,
6   I mean that we could see, if we looked, that
7   event storms were happening. It does not mean
8   that it necessarily had any impact on their
9   branch accounts. I'm not saying that every week
10   a number of sites were having incorrect
11   discrepancies because of this problem.
12 Q.   But you didn't know one way or the other?
13 A.   We would have known -- okay, it's slightly
14   peripheral. Some aspects, including the
15   transfer problem, and the rolling over without
16   the transactions included, would have caused
17   entries on the reconciliation reports, certainly
18   up to 2005. So that would -- those would all
19   have been investigated as they happened. And
20   I'm certainly not aware -- I don't remember that
21   every week we were having a branch or two with
22   those reconciliation report entries --
23 Q.   But, Mrs Chambers, this is a problem that's been
24   going on for five or six years.
25 A.   Yes, and if we had been getting all those

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1   reconciliation report entries at that sort of
2   level for five years, it would absolutely
3   definitely have been picked up and seen as being
4   a big ongoing problem.
5 Q. But isn't that relying on subpostmasters -- to
6   an extent, relying on subpostmasters calling in?
7 A. Not the reconciliation report entry reports.
8 Q. No, the other part of the answer that you
9   gave --
10 A. The other part of them phoning and saying, "Oh,
11   I'm doing my balancing and it's all gone
12   haywire"? Yes, for us to know about it, they
13   would have had to phone in and that call would
14   have had to be passed to SSC and it's quite
15   possible/probable, that the majority of those
16   calls were not passed to SSC because they were
17   just being told to reboot.
18 Q. Yes. Did you know how many sites were affected
19   every week?
20 A. No, I could have known if somebody had asked me
21   to monitor that and, obviously, at the point
22   that I was doing some analysis, then I did know.
23   And I think I found -- I can't remember what
24   period it was, in that previous KEL we looked
25   at -- previous PEAK we looked at, where I did do

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1   some monitoring and I'd found two branches with
2   the event storms. But, as I say, I can't now
3   remember what length of time that was over.
4 Q. You continue in that sentence:
5   "... and finally Escher say they have done
6   something about it."
7 A. Yes.
8 Q. In your witness statement, you say that:
9   "I and others in the SSC understood the
10   cause of the problem was to be a problem in the
11   Riposte software, which we thought was being
12   investigated by Escher."
13   Of the five or six-year period that we're
14   looking at, for how long had you thought that
15   Escher had been investigating the issue?
16 A. I thought they'd known about it all the time.
17   I now think -- well, I now know, since putting
18   all the calls together, and so on, that that's
19   extremely unlikely.
20 Q. What had gone wrong?
21 A. Um, it was -- nobody was managing it as
22   a problem. It was almost impossible for SSC
23   staff to see which calls were with Escher and
24   who was progressing those, because they sort of
25   went on to a separate PEAK stack, which I now

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1   know, yes, we could see but I don't think at the
2   early days I knew quite where it was. And it
3   wasn't SSC's job, really, to be monitoring
4   those, but I'm not sure whose job it was.
5   Yeah, I think if we'd appreciated that
6   nobody effectively was looking at this for all
7   that time, we would have flagged it up and
8   jumped up and down. But that realisation just
9   didn't come until late in the day when,
10   finally -- you know, we did send a call over.
11   It did get picked up, eventually, and sent to
12   Escher and they did produce a fix.
13 Q. You say you were interested in whether they have
14   really fixed it.
15 A. Oh, I never believe anything anybody tells me.
16 Q. Was that --
17 A. You check; you double check; you triple check.
18 Q. Was that more directed to what you knew about
19   Escher, rather than being cynical about the
20   world in general?
21 A. No, I was cynical about the world in general.
22 Q. You therefore left the call open, the PEAK open?
23 A. Yeah.
24 Q. If we turn up paragraph 81 of your witness
25   statement, please, on page 26. Paragraph 81 at

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1   the top. You say:
2   "I am asked whether Post Office or
3   subpostmasters were told about the problem. It
4   was not raised as a wider problem with Post
5   Office; each instance was treated individually."
6   Does that mean, until that email chain that
7   we picked up a moment ago, that Post Office was
8   kept in the dark for the best part of six years.
9 A. I'm not sure they were intentionally kept in the
10   dark but I think they were in the dark, yes.
11 Q. You say each instance was treated individually.
12   Why was each case treated individually?
13 A. Because we would look at the calls that did come
14   through, where they came through to us, and if
15   there was an effect on the branch accounts, then
16   we would pass the information via MSU to Post
17   Office on a BIMS report or it was passed that
18   way.
19 Q. This had been a problem that had been around for
20   five or six years. Would you accept that
21   Fujitsu had failed properly to investigate and
22   address the bug?
23 A. Yes.
24 Q. And failed to tell -- I'm not saying that you
25   personally failed to tell -- the Post Office

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1   about its existence?
2 **A.** Yes, I think because it was always treated as
3   individual instances, it wasn't raised as
4   a problem and flagged through to Post Office.
5 **Q.** You said in your email that you wanted to wait
6   and see to see whether the S90 release was
7   an effective fix. Was that a case of waiting to
8   see whether any more calls came in from
9   subpostmasters and, if so, whether any of those
10   calls could be linked to the Riposte lock
11   problem?
12 **A.** No, I monitored the events coming through the
13   system to see if there were any more of these
14   event storms occurring anywhere.
15 **Q.** To complete the loop, if we may look at a last
16   couple of documents. FUJ00083667. This is
17   a PEAK, 0127246, opened on 12 October 2005. If
18   we look at page 3 and the entry for 11.14.22 at
19   the top of the page. You say:
20   "Since [the release] S90 was distributed,
21   the number of these timeout events over the
22   whole estate has gone right down, with no storms
23   from an individual counter. So it looks as if
24   the Riposte change has been effective."
25 **A.** Yes.

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1 **Q.** Can you remember why, in February 2010,
2   Mr Jenkins would be contacting you about what
3   had happened to the Callendar Square bug back in
4   2006?
5 **A.** I -- no, I don't remember specifically why. It
6   might have been because he was involved in
7   a prosecution and wanted to know some of the
8   details in case this was raised. I did my best
9   to provide some information for him.
10 **Q.** So let's see what you told him, please. If we
11   just scroll up, please. You say, "Gareth", and
12   you give a reference to a KEL:
13   "I'd forgotten -- this did give
14   a discrepancy, but also a receipts and payments
15   mismatch, if they persisted and rolled over
16   (though it was usually obvious that something
17   was wrong).
18   "And a flood of NT events (not 'Riposte
19   events'!) which SMC should have noticed at the
20   time.
21   "Since we are now checking for these
22   particular events, and did a catch-up for old
23   retrievals, can you say that the current branch
24   did not have a problem??"
25   What were you referring to when you said

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1 **Q.** Was that your measure of working out whether the
2   fix had been effective?
3 **A.** Yes.
4 **Q.** Was there any other means of working out whether
5   the fix had been effective?
6 **A.** I think that was a reasonable check of whether
7   the fix had done what was expected of it.
8   Obviously if, after this, we got more calls
9   about balancing issues, failure to replicate
10   across counters, and so on, then they would be
11   investigated from scratch again.
12 **Q.** Lastly, can we look at an email exchange,
13   please, between you and Mr Jenkins from 2010.
14   That's FUJ00083722.
15   If we look at the email at the foot of the
16   page, please. Can you see your email, from you
17   to Mr Jenkins?
18 **A.** Yes.
19 **Q.** You forward, I think, if you look underneath it,
20   the chain from back in 2006 that we see?
21 **A.** Yes.
22 **Q.** Why were you doing this?
23 **A.** I presume he had contacted me and asked me what
24   I could remember about the Callendar Square
25   problem.

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1   "the current branch" --
2 **A.** That suggests he was asking me about some
3   specific branch and could we see if they had had
4   the Callendar Square problem or not. But I now
5   don't know which the "current branch" would have
6   been.
7 **Q.** Would you interpret that as meaning "Can you
8   say, in the evidence that you are to give, that
9   the current branch did not have this problem?"
10 **A.** I cannot remember precisely why he was asking me
11   but that is a possibility.
12 **Q.** You say:
13   "Anyway it stopped happening once S90 was
14   installed ...
15   "This particular problem would only affect
16   branches with more than one stock unit. It
17   happened several times at Callendar Square,
18   though we never found why they were so badly
19   affect.
20   "Is this sufficient?"
21   The line, "This particular problem would
22   only affect branches with more than one stock
23   unit"; was that accurate?
24 **A.** That was accurate if we were talking about the
25   Callendar Square part of the Riposte lock

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1   problem. Callendar Square had had the very
2   specific problem of being able to do the
3   transfer ins multiple times, so that's what
4   I was referring to there. You could only do
5   transfers out and in if you had more than one
6   stock unit. There may well have been a separate
7   email or two or discussion behind this specific
8   email but I cannot remember now.
9 Q. Then scrolling up to see what Mr Jenkins' reply
10   was:
11   "Thanks Anne,
12   "Penny ..."
13   Is that Ms Thomas?
14 A. I would think so, yes.
15 Q. "... pointed out on Friday that [the Post
16   Office] have not asked us to retrieve any data
17   for this branch yet! Therefore we have no
18   message stores to check against Event Logs.
19   "This will probably do me more now."
20   Does the case of Seema Misra ring any bells
21   with you?
22 A. I've obviously heard the name, yes.
23 Q. Is that recently seen the name or something you
24   recall being asked about back in 2010 and
25   Mr Jenkins' preparation to give evidence in the
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1   Seema Misra case?
2 A. I think it's likely I had some involvement back
3   then but I cannot remember definitely which case
4   that was.
5 Q. Can you remember the context of this exchange,
6   ie he was asking you for what he should say or
7   things to say by reference to your work and your
8   understanding of the issue in the Seema Misra
9   case?
10 A. I thought he was just, sort of, checking with me
11   just to see what I knew in general about the
12   problem, and so on, what my recollection of it
13   was.
14 MR BEER: Thank you. Mrs Chambers, they're the only
15   questions I ask you at the moment. I'm going to
16   have to draw a line under Bug 2 and ask you
17   about the remainder of things when you come back
18   in the future for your Phase 4 evidence. I need
19   to allow reasonable amount of time for other
20   people to ask their questions. Thank you very
21   much for the evidence you've given.
22   Sir, might that be an appropriate moment to
23   take a ten-minute break for the transcriber --
24   15-minute break, she's mouthing to me -- until
25   3.35?
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1 SIR WYN WILLIAMS: Well, on the basis of the
2   guesstimates that you were provided by your
3   colleagues yesterday, that should provide
4   sufficient time to finish by around about 4.15?
5 MR BEER: Yes, I think so.
6 SIR WYN WILLIAMS: All right.
7 MR BEER: Thank you very much.
8 (3.20 pm)
9   (A short break)
10 (3.34 pm)
11 MR BEER: Sir, thank you. Can you see and hear us?
12 SIR WYN WILLIAMS: Yes, I can.
13 MR BEER: Thank you very much. I think Mr Stein is
14   going to ask questions first.
15 SIR WYN WILLIAMS: Right.
16   Questioned by MR STEIN
17 MR STEIN: Mrs Chambers, I ask questions on behalf
18   of a large number of subpostmasters and
19   mistresses on behalf of a firm of solicitors
20   called Howe+Co.
21   You've given evidence and been asked a large
22   number of questions by Mr Beer, so I don't need
23   to cover those areas.
24   You said, as part of your evidence that on
25   some KELs you would see associated issues but
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1   not all. You also said, as part of your
2   evidence today, that sometimes you would expect
3   to your colleagues and then you would discover
4   that they'd been dealing with another matter in
5   the last few weeks. Now, help us a little bit
6   with the question of duplicates. There was
7   a system that we know that the first tier of the
8   helpline were discouraged from sending through
9   duplicates to the third, fourth lines. Now,
10   would you see on your KELs that there were
11   duplicates?
12 A. You mean if the Helpdesk had used the same KEL
13   for various tickets that they had received?
14 Q. If they had recognised what they thought or
15   believed was a KEL that was the same as one that
16   was already being dealt with, would you see
17   that?
18 A. Not automatically, no. But, obviously, some
19   KELs would say, "Send the call to SSC". Even
20   though it's logged as a known problem, we would
21   still make it clear on the KEL that we still
22   needed to see the call, if that was thought to
23   be appropriate.
24 Q. So if you didn't see some of the issues that
25   were coming through, because they were thought
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1 to be duplicates and therefore shouldn't go to
2 third and fourth line support, does that mean
3 that you were not always aware of how many calls
4 were being made through to the helpline on the
5 same issues?
6 **A.** That's true, if it was something that there was
7 a resolution or possibly a workaround, which
8 they could tell the postmaster about themselves.
9 **Q.** Who provided the training to the first line
10 support, the first line Helpdesk call answerers
11 so they could recognise that this was the same
12 or a different KEL; who provided that training?
13 **A.** I don't know who provided their training.
14 **Q.** Were you ever asked to provide such training?
15 **A.** No.
16 **Q.** During the evidence in this Inquiry, many of our
17 clients, who are ex-subpostmasters and
18 mistresses said that their accounts, branch
19 accounts, never seemed to balance. So that was
20 Janice Adams; Mujahid Faisal Aziz explained that
21 there were very any shortfalls that they had to
22 balance by paying in cash; Edward Brown said
23 similar matters occurred to him and that it
24 wasn't always a large shortfall but sometimes it
25 could be into the thousands; and Gary Brown

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1 reported that the shortfalls happened so often
2 that it was hard to keep track.
3   Can you help us understand how it was that
4 the subpostmasters and mistresses experienced so
5 many shortfalls?
6 **A.** No, I can't, and it obviously concerns me if
7 this was happening and they weren't being given
8 assistance by anybody to get to the bottom of
9 these problems.
10 **Q.** You've mentioned at the closing part of your
11 statement, paragraph 212, I'll read it out,
12 that:
13   "A point of frustration with the system was
14 that the users, namely the subpostmasters, were
15 not our clients, and there was a practical limit
16 as to the extent to which we could work together
17 with them to investigate problems."
18   Was that true, this difficulty, having that
19 separation?
20 **A.** Yes. I mean, we had no ability to find out what
21 was actually taking place at the branch. I'm
22 not necessarily saying it was their -- they were
23 making errors that were causing these problems
24 but where we were checking, by one means or
25 another, that the system was correctly

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1 calculating discrepancies based on the
2 transactions that had been recorded on the
3 system for the branch, then if that calculation
4 and those checks show no problems, then you've
5 got to try to find out what has been recorded in
6 the branch accounts or what is missing in the
7 branch transaction list which is causing the
8 discrepancy.
9   And unless you've got some way of going to
10 a branch and actually finding out what should
11 have gone onto the system, then you cannot
12 identify the cause of the discrepancy.
13 **Q.** When you say at paragraph 212 that the
14 subpostmasters were not your clients, your
15 client was the Post Office?
16 **A.** Yes.
17 **MR STEIN:** Excuse me one moment.
18   Thank you, Mrs Chambers.
19   **Questioned by MR MOLONEY**
20 **MR MOLONEY:** Mrs Chambers, one matter and it's just
21 one document, FUJ00138385.
22 **A.** I'm sorry but I can't hear you very clearly.
23 **Q.** I'll speak up and get closer to the microphone.
24 Sorry, Mrs Chambers.
25 **A.** Thank you.

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1 **Q.** It's just one document, FUJ00138385, and it
2 should go onto the screen -- and it's on screen
3 now. Thank you.
4   The subject line, the title, is "Requesting
5 journal data from Audit", the author is you,
6 Mrs Chambers, and it's created on 25 August
7 2011.
8 **A.** Yes.
9 **Q.** So that's after the migration to HNG-X or
10 Horizon Online --
11 **A.** Yes.
12 **Q.** -- however one terms it. We see from this
13 document that:
14   "All journal messages arriving at the data
15 centre are retained for audit. Occasionally SSC
16 may need to ask for data to be retrieved to
17 enable issues which happened more than six
18 months ago to be investigated."
19   Then in brackets:
20   "(Less than six months, there may still be
21 sufficient and more accessible information in
22 BRSS).
23   "When asking for transactions for a FAD ..."
24   That's a branch, isn't it?
25 **A.** That's a branch.

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1 Q. "... and date range, ask for the
2   QUERY_AT\FINAL\Filteredhx.xml file which will
3   contain all transactions for a given date range
4   and FAD code in XML format. These will however
5   lack the JSN and ReqMessageID.
6   "The alternative is raw files containing
7   data for all 80 or so branches with the FAD
8   hash, which is far harder to read but does
9   contain JSN and ReqMessageID.
10   "Route the PEAK with the request to Security
11   Ops.
12   "If you think the call may be part of a Post
13   Office investigation into a branch that might
14   lead to litigation, then this should not be
15   handled by SSC unless already authorised by the
16   SSC manager."
17   So it follows from this document, as we are
18   already aware, that different types of audit
19   data provided different information to analysts?
20 A. Yes.
21 Q. So here, it refers to raw files of data or raw
22   data?
23 A. Err ...
24 Q. As one type of data available?
25 A. One type of data is the raw files, yes.

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1 Q. And then there's the XML files, as well?
2 A. Yes.
3 Q. The raw files of data, the raw data, would
4   contain information not contained in the XML
5   file?
6 A. It -- yes, I cannot now remember precisely what
7   the details are but, obviously, there's two
8   fields there that might have been of use.
9 Q. Yes. How frequently would raw data be requested
10   in your experience?
11 A. I can't remember ever personally actually
12   requesting journal data from Audit. I almost
13   certainly did on occasion but I've got no memory
14   of doing it. It certainly wasn't a frequent
15   thing.
16 Q. Why would the PEAK and request have to go to
17   Security Ops, as is said in the third line from
18   the bottom?
19 A. Because they were the ones who could access this
20   data and they had to extract it from the audit
21   servers. Only they could do that.
22 Q. Right. How would an SSC analyst be aware that
23   a request might lead to litigation?
24 A. Not might lead to but might already be part of
25   a Post Office -- sorry, yes. Um, it would just

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1   depend, you know, where the call had come from,
2   if anybody had mentioned this. I don't know.
3   I mean, how we would tell that now, I'm not
4   100 per cent sure.
5 Q. Yeah. Because this does say that:
6   "If you think the call may be part of a Post
7   Office investigation into a branch that might
8   lead to litigation, then this should not be
9   handled by SSC unless already authorised by the
10   SSC manager."
11   Why would the request not be handled by SSC
12   unless already authorised by the SSC manager?
13 A. I presume I was told that. I'm not sure.
14   I mean, this is an unusual situation if we are
15   asked to investigate something that happened
16   more than six months ago. Normally, we're
17   investigating -- would have been investigating
18   things that had happened recently. So I presume
19   that was what I was told, and that is why
20   I added that into the work instruction. But
21   I cannot remember of any conversation about
22   that.
23 Q. So this is a work instruction, is the term
24   you've just used; is that right?
25 A. Sorry yes, a "WI" is a work instruction.

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1 Q. Work instruction. You would have been told that
2   if it was part of a Post Office investigation
3   into a branch that might lead to litigation,
4   then it shouldn't be handled by SSC, unless
5   already authorised by the SSC manager?
6 A. I appear to have included that in the work
7   instruction, so I assume that was what I was
8   told.
9 Q. So did you understand why it was that you were
10   told that this should be included in the work
11   instruction?
12 A. Because presumably, in that case, Post Office
13   would be putting in their own request for the
14   data.
15 Q. Why would that need to be authorised by the SSC
16   manager?
17 A. Just because I was told that. I'm sorry, I have
18   no real recollection of this. I don't recall
19   being told it. I don't actually recall writing
20   the work instruction but I obviously did.
21 Q. Just to float one possible reason, could it be
22   a reason of payment for this type of request?
23 A. That may have come into it because I think Post
24   Office were -- they were charged for data
25   retrievals but, yeah, I think this would be

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1   better directed at my -- one of my managers,
2   probably.
3 Q. Of course. I only ask you because you're the
4   author of this document, Mrs Chambers.
5 A. Yes. I expect Steve or somebody said, "Oh, this
6   ought to be in a work instruction, can you
7   create one?"
8 Q. That was the final question I had for you, which
9   is: in what capacity were you providing
10   direction of this nature to your colleagues?
11 A. Obviously, I would have a good understanding of
12   the technical messages and the content of the
13   messages, and so on, or, you know, a reasonable
14   understanding of that. And, yeah, I'm --
15   I wrote a work instruction. I'm sorry, I don't
16   really remember any more about it than that.
17 Q. Given that you didn't know really why that final
18   three lines, or rather final two lines, were
19   included within this work instruction or you
20   can't remember why, would this have been better
21   being a work instruction emanating from your
22   manager rather than from you?
23 A. Um, yes, it probably would have been, but if
24   a work instruction was felt to be needed for
25   something, then somebody might well be asked to
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1   just "Oh, could you write that work
2   instruction?" But that didn't mean that all the
3   content necessarily came from me. We could all
4   write work instructions and it was the sort of
5   job that got shared out amongst us.
6 MR MOLONEY: Thank you very much, Mrs Chambers.
7   **Questioned by MS PAGE**
8 MS PAGE: I'm so sorry, can I just ask those in
9   front of me to just sit as they normally do, so
10   I can see the witness. Thank you very much.
11 A. I still can't hear you terribly clearly.
12 Q. Is that any better?
13 A. That's better, thank you.
14 Q. It's Flora Page, also acting for a number of
15   subpostmaster Core Participants. I'd like to
16   take you to two documents. They're both PEAKs
17   or possibly one might be a PinICL and they both
18   deal with the process that you went through in
19   order to insert transactions to ensure that the
20   accounts were balancing properly.
21   So the first one is FUJ00152239. What we
22   can see is that the summary at the top shows us
23   that the office can't balance as there are
24   "incorrect fees on POs", and I think that stands
25   for Postal Orders?
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1 A. Yes, it does.
2 Q. We can see that this dates from July 2001. If
3   we then -- I don't think we need to see anything
4   in the first few dealings but if we go down to
5   page 4 and we can see that it starts off in your
6   department with Barbara Longley, who's the
7   administrator; that's right, isn't it?
8 A. Yes.
9 Q. Then we see that John Simpkins initially picks
10   this up, and we can see that he has -- or
11   somehow, about halfway down the page, he has
12   noticed -- he says:
13   "PRESCAN: Check date/time runs in message
14   store for time BU was swapped."
15   So we can see a base unit has been swapped
16   out; is that fair?
17 A. Yes, that would be fair.
18 Q. Then if we go a bit further down, John Simpkins
19   has assigned this to you, "Team Member: Anne
20   Chambers", or somehow it has been assigned to
21   you; do you see that?
22 A. Yes, I do.
23 Q. Then he says that it might be:
24   "... a problem due to the corrupt storage
25   unit, check the message store for any corrupt
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1   entries then insert a REM OUT for PO Fees ..."
2 A. I see that.
3 Q. Yes, but if we then go over the page, you seem
4   to take a slightly different view at one point,
5   but we'll go through it logically. At 15.41,
6   you say:
7   "It looks as if Adjusts Stock on 4th Jul was
8   showing incorrect figures ..."
9   Then you've referenced a KEL.
10   "As a result, the PM did couple of sets of
11   unnecessary SAPs ..."
12   After base units swapped, it seems.
13   Then if we go down almost to the bottom of
14   the -- I'm so sorry, to about four lines below
15   that, you say:
16   "I've raised OCR AChambers ... to allow us
17   to correct the messagestore."
18   So that's an instance, is it, of you saying
19   that you need to go through the change control
20   process to insert transactions; is that right?
21 A. That appears to be what I did. I have to say
22   I have no recollection of this at all.
23 Q. I wouldn't be surprised, it's obviously going
24   back a very long way, isn't it?
25 A. Yeah.
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1 Q. Then it says, below that:
2   "Incident Under Investigation."
3   Then, if we go further down, we can see "New
4 evidence added", and I'd just like to try to
5 understand what these evidence types are.
6   We've got:
7   "New evidence added -- Full message store."
8   Then we've got:
9   "New evidence added -- audit logs."
10   Then we've got:
11   "New evidence added -- PSStandard logs."
12   Is "full message store" the equivalent of
13 what became the ARQ data?
14 A. No, it's not. It would include all the ARQ data
15 but it's the -- all the messages for the branch
16 that were in existence on the day and time that
17 I did the retrieval. I'd have retrieved it from
18 the copy of the message store that was held on
19 the correspondence server centrally and so it's
20 all the transaction messages and a lot of other
21 messages that have been written in the last 42
22 days, it would have been at this point, plus all
23 the reference data relating to the branch. But
24 the ARQ data is the same data but it's captured
25 in a different way.
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1 Q. That last bit you said is the bit I wanted to
2   get at. It is the same data, is it?
3 A. It's the same data which I'd retrieved from the
4   correspondence server but the messages, as they
5   came in from -- I think it was happening all the
6   time -- as they came in from the branch to be
7   fed into the correspondence server message
8   store, they were also -- there was a stream of
9   them going out all the time into the audit
10   files. So the ordering, in particular reference
11   data, and so on, would be rather different but,
12   overall, it's the same data.
13 Q. So that's the evidence that could be captured
14   for a significant period of time afterwards and
15   that was stored --
16 A. The ARQ data files were kept for a significant
17   amount of time. The message store, some of the
18   messages persisted, but others would be archived
19   or deleted after 42 days.
20 Q. All right, so it's not identical. All right.
21   Well, then, audit logs. What is that? Is that
22   identical with ARQ or not?
23 A. No, this is the files that I had totally
24   forgotten about until Mr Beer reminded me of
25   their existence yesterday, I think it was, which
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1 were kept on the counters, were written on the
2 counters, and contained a certain amount of
3 diagnostic information written to the file by
4 the counter application as things were done.
5 I can't -- I've got very little recollection of
6 precisely what that looked like.
7 Q. Then PS standard logs, what are they?
8 A. That's another counter log file in which you
9 could see messages to and from the counter
10 peripherals. Things like the printer and the
11 barcode reader, and so on.
12 Q. None of that was kept for any significant period
13 of time; is that fair?
14 A. No, that wasn't kept and it normally wasn't
15 retrieved from the counter. It was only if we
16 were investigating something we would get the
17 file from the counter.
18 Q. Yes. All right. Then further down, we can see
19 that you're asking for Development to look at
20 this and then, if we go over the page, you say
21 you haven't been able to reproduce it:
22   "This counter had a box swap an hour before
23 the problem occurred but I don't think that is
24 relevant."
25   You've then said that you've got another
                    175

1 report of the same problem elsewhere and you
2 give the forward number for the branch:
3   "... so please can this be looked at quickly
4 (especially as if it is not reported before
5 rollover, we have to get POCL authorisation for
6 the fix and so it is very visible)."
7   That means, does it, that if you had to fix
8 it after rollover by inserting transactions,
9 then it would be visible in some way?
10 A. I'm struggling to remember any details of this.
11 I think if it was reported, but not until after
12 the rollover, we probably possibly couldn't have
13 fixed it at all. There would have been
14 a receipts and payments mismatch, and then we
15 would just have reported it to Post Office
16 through the MSU BIMS route. But I can't be
17 certain about this, having no memory of it, and
18 I don't think I've seen this document until this
19 moment.
20 Q. The word there, "visible", visible to whom, do
21 you think?
22 A. I don't know why I used that word. Yeah,
23 visible to Post Office, I suppose. But, as
24 I say, I have no memory of this.
25 Q. Or visible to the subpostmaster?
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1   A.   Um, I think the subpostmaster knew about the
2   problem already because they had reported the
3   problem.
4   Q.   True, but you've identified that there is
5   another problem elsewhere.
6   A.   Yes. That had been reported to us as well, so
7   that was another postmaster who had noticed that
8   it had happened. I mean, the summary is that
9   they can't balance. I can't remember if it
10   actually totally stopped the process because of
11   this inconsistency, or if they could push on.
12   I mean, obviously Postal Orders and the fees
13   associated with them should always be in step
14   with each other. You shouldn't be able to have
15   one without the other, and something had gone
16   wrong here, and they were out of step.
17 Q.   A little further down, it says that there may
18   be -- the counter is M1 and M1R. You may not be
19   able to recall what that means. But you do
20   say -- sorry, Les Ong says:
21   "There are two fixes that I know of ...
22   relating to Postal Orders that could have
23   a bearing on this ..."
24   Then, if we go over the page, what we see
25   when it comes back to you -- and this is on
                        177

1   10 July, so it's a subsequent day -- at 15.31:
2   "Authorisation for messagestore amendment
3   now received from ..."
4   Then we seem to get an email address,
5   "mick.theobald", and it has been edited out so
6   we don't have the full email address. Is that
7   a name that rings a bell?
8   A.   I think he was a Post Office person but I can't
9   be a 100 per cent sure.
10 Q.   Following that and a little further down, we see
11   that:
12   "Applied fix to message store ..."
13   Then there's the reference to the OCR again,
14   and:
15   "Balance snapshot now shows 19 POs and fees.
16   Leaving call open until balancing/cash account
17   done."
18   So it looks as if it has been possible to
19   apply this before rollover.
20   I suppose the question that I'd like to ask
21   is how would it be possible to see, on the ARQ
22   data, what had happened here?
23 A.   Right. In the ARQ data, you would see, when the
24   initial problems were happening, the SAP --
25   stock adjust positive and stock adjust
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1   negative -- lines that related to where they
2   were trying to adjust their stock of Postal
3   Orders which they'd documented, and it was in
4   there that the amounts got out of step in that
5   one, for the Postal Order itself it was for
6   a certain quantity, and for the fee it was for
7   a different quantity. So that's where the
8   problem arose.
9   And then, in the ARQ data for 11 July, you
10   would see the transaction also affecting the
11   postal -- presumably affecting the Postal Order
12   fees product, which I'm guessing now, but
13   I imagine was another stock amount -- stock
14   adjust transaction for the difference that was
15   wrong. Whether there is anything on that
16   individual message which, in the ARQ data,
17   enables you to know that it was me who did it
18   and not somebody at the branch, I do not now
19   know, because I have got no record in this PEAK
20   here of exactly what it was that I inserted.
21   It's possible, as I said before, sometimes
22   we used a dummy counter number. Sometimes we
23   inserted a comment, but that is not necessarily
24   going to be visible in the ARQ data as
25   retrieved. Sometimes we used a username to try
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1   and make it obvious that it was SSC who had made
2   the change but it's not recorded on the PEAK
3   here precisely what was done. Those messages
4   would have been captured somewhere and recorded
5   for posterity but I don't know where.
6   Q.   The transactions would be asynchronous, would
7   they, in the sense that the balancing
8   transactions that you've inserted would show the
9   date that you inserted them, not backdated?
10 A.   Yes.
11 Q.   All right. Thank you. If I may just then
12   briefly -- the next one is a bit quicker. If we
13   look at FUJ00152240. We can see this is
14   summarised as "Cannot put transfer through", and
15   this dates from 2004. The last entry that we
16   can currently see says:
17   "PM reports that he cannot put a transaction
18   through it keeps coming up with an error
19   message."
20   If we then pick this up on page 2 at 12.30,
21   if we scroll down a little bit, this is where
22   Barbara Longley has assigned it to you and
23   you've stated that:
24   "The transfer causing the problem was
25   started while the user was attached to the
                        180

1   SU BDC."
2   Can you just remind us: SU BDC?
3   **A.**   Stock unit called BDC, which was most likely
4   Bureau de Change.
5   **Q.**   That certainly seems to be an issue with this
6   one. There does seem to be problems with it
7   being foreign transfer. Then you've said, in
8   the last paragraph of this entry:
9   "I've spoken to the PM and asked him not to
10   balance stock units BDC, MM or MC until we have
11   sorted out the problem. I'm loading up the
12   messagestore on a test counter and hope that by
13   amending the EPOSSTransfers object it will then
14   be possible to reverse the transfer."
15   If we scroll down, just going over the page
16   line:
17   "I've made a messagestore correction ..."
18   So you've then given an OCR reference so it
19   looks as if, again, we've got this process where
20   you're formally seeking the approval to insert
21   a transaction; is that right?
22   **A.**   That's what it looks like. Again, I've not seen
23   this and I've got no recollection of it, but it
24   looks like it.
25   **Q.**   It says:

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1   "Before and after messages attached."
2   Is that a practice that rings a bell?
3   **A.**   Well, we always -- yes, we'd always make
4   a record of what we were changing or adding in.
5   I don't know precisely now what they look like.
6   **Q.**   When you say "attached", is that attached to the
7   PEAK?
8   **A.**   Yeah.
9   **Q.**   So the PEAK would have had the messages before
10   and after the message you inserted attached to
11   it; is that right?
12   **A.**   That's what it sounds like, yes.
13   **Q.**   You've then recorded:
14   "Have spoken to PM and informed him he
15   should be able to continue with the balance
16   now."
17   **A.**   Yes.
18   **Q.**   What you don't say is "I've informed him I've
19   inserted a transaction into your account", do
20   you?
21   **A.**   I don't explicitly say that, but I imagine
22   I would have explained to him what I had done,
23   and that I had removed the transfer, which I --
24   I mean there's -- it's -- I'm not clear from
25   this whether I wrote a pair of corrective

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1   messages that actually removed -- how would it
2   have done it? Um, I'm not clear. Further up in
3   the call there was mention of an EPOSS transfers
4   object and suggesting that that needed to be
5   rewritten in order to let this progress. So
6   I don't know if that's what I actually did, or
7   whether I did insert a pair of opposite messages
8   to undo the transfer that was outstanding.
9   I certainly wouldn't have hidden from him
10   the fact that I was changing something on his
11   system which would remove this transfer that was
12   preventing him from balancing his office and
13   continuing to trade, to do his normal business.
14   **Q.**   Not hidden, but maybe not mentioned in the sense
15   that it's not recorded?
16   **A.**   It's not written down but that doesn't mean
17   I would have said it because I usually did.
18   I didn't make a secret of the fact that system
19   problems happened, and I think it was
20   perfectly -- I'm sure it was perfectly clear to
21   him that there had been a system problem to do
22   with a transfer which I then -- and then, once
23   I had done whatever it was I did, the transfer
24   that he didn't -- that was stopping him had been
25   removed in some way in order for him to

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1   progress.
2   The fact I didn't write it down does not
3   mean I said absolutely nothing to him.
4   I certainly wouldn't have phoned him back and
5   said, "Oh look, it's miraculously all okay now,
6   you don't need to bother any more". I wouldn't
7   have approached it in those terms, but I do not
8   know precisely what I said to him.
9   **Q.**   Well, a system problem is one thing, but
10   actually inserting transactions into the data
11   that's stored on his counter is a different
12   thing, isn't it? If it's not written and
13   recorded here, how would he -- how would
14   posterity ever know that you'd ever said that to
15   him and told him that's what you were doing?
16   **A.**   If I'd known posterity was going to be asking
17   I would have written it down. But I don't know
18   if there's any more information in the OCR.
19   That certainly would make it clear exactly what
20   it was that I did.
21   Whether I explicitly said, "I have removed
22   the transfer, I have accessed your counter
23   transactions and removed the one that was
24   causing the problem", which is effectively what
25   I'd done, I'm not sure it even needed saying.

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1 I would have thought he would have realised that
2 that was what I had done. But I cannot -- I do
3 not know what I said.
4 **MS PAGE:** Thank you. Those are my questions.
5 **SIR WYN WILLIAMS:** Is that it? Anyone else have any
6 questions?
7 **MR BEER:** No, they don't, sir. Thank you very much.
8 **SIR WYN WILLIAMS:** Right. Well, thank you,
9 Mrs Chambers, for giving detailed answers to
10 detailed questions over two days. As you know,
11 you will be asked to return at some future date.
12 I don't think we can yet tell you what that date
13 is. If you haven't already received it, the
14 probability is that you will get another Rule 9
15 Request so that the general questions will be
16 provided to you in advance and although, in
17 a sense, you're in the middle of giving your
18 evidence, it's unreasonable for me to expect
19 that you don't have access to your lawyers if
20 you want to have access to your lawyers.
21 So unless anybody immediately shouts out and
22 says to me "You can't do that", I'm now going to
23 tell you that if you want to speak to your
24 lawyers, you can. All right?
25 **A.** Thank you.

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1 **MR BEER:** Thank you very much, sir.
2 For reasons that you know, we return on
3 Tuesday next week, 9 May, to hear evidence from
4 Barbara Longley at 10.00 am.
5 **SIR WYN WILLIAMS:** All right. Then the Inquiry is
6 adjourned until then. Thank you all very much.
7 **MR BEER:** Thank you, sir.
8 **(4.12 pm)**
9 **(The hearing adjourned until**
10 **Tuesday, 9 May 2023 at 10.00 am)**

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