Witness Name: David Wilcox

Statement No.: WITN08080100

Dated: 16 March 2023

POST OFFICE HORIZON IT INQUIRY

FIRST STATEMENT OF DAVID WILCOX

I, David Wilcox, will say as follows...

INTRODUCTION

I am a former employee of ICL/Fujitsu and held the position of Reference

Data Manager when working on the Post Office Account.

This witness statement is made to assist the Post Office Horizon IT Inquiry

(the "Inquiry") with the matters set out in the Rule 9 Request dated 17 January

2023 (the "Request").

- I worked for ICL/Fujitsu from 1970 until I retired in 2012. The last role I had with the company was that of Reference Data Manager on the Post Office Account, known as Horizon to the Post Office.
- 2. I joined ICL in 1970 working in Oxford as a peripheral engineer. I was sent on training courses to be able to fulfil that role. I was later trained on the 1906A mainframe system hardware and then developed skills working with the system software which, in time, led to me joining the Worldwide Support unit based in Bracknell. That unit was disbanded in 1980 and I then became the Small Systems Support Manager for the South West of England, based in Reading.
- 3. In 1985 an opportunity arose in Iraq and I was there from 1985 until 1990, initially as the System Support Manager and later the Customer Support Manager, deputizing for the Country manager when he was out of the country. When we were forced to leave Iraq ICL moved me and several of my colleagues to Abu Dhabi where I worked as a support manager until the end of 1997.
- 4. In the autumn of 1998 I joined the Post Office account as the Reference Data Manager, for a short time based in Feltham, then Bracknell for the remainder of my time in ICL/Fujitsu. I held the position of Reference Data Manager until my retirement in 2012. During the last 18-months or so before I retired I was less hands on the day to day running of Reference Data and spent a lot of my time documenting the systems and practices that had been developed by me and my team.

5. One of the questions I have been asked by the Inquiry relates to the approach to bug fixing. One of the earliest things I learned as a hardware engineer is that hardware problems have to be fixed, there are rarely workarounds. When I moved over to supporting software I carried this approach with me and always attempted to fix problems rather than simply providing a workaround or suggesting that the user was wrong.

BACKGROUND

- 6. It should be noted that whilst I was the Reference Data Manager the ICL/Fujitsu Reference Data Team was not a part of the SSC and had no responsibility for software support on the Horizon system, nor access to any of the live Horizon system in the datacentre or the counters in Post Offices. In the last two years or so before I retired I reported to the SSC manager but my team still did not work in the SSC.
- 7. The Horizon system is driven by its Reference Data. The task of the Reference Data Team (RDT) was to process Reference Data supplied from the Post Office, validate it as far as the team was able, pass the data on to Post Office staff for their validation and then release it to the Horizon system when instructed to do so by the Post Office RDT.
- Reference Data from Post Office was held in the RDMC (Reference Data Management Centre) database and, when release was authorised by Post

Office, processed by the RDDPL (Reference Data Process to Live) database which passed the processed data to Correspondence Servers for delivery to the Post Office Counters. RDT had systems which mimicked the live RDDPL and Correspondence Servers which allowed both the ICL/Fujitsu and Post Office RDT's to check/prove Reference Data on counters connected to the RDT systems before releasing it to the live system. The original RDT systems were run on servers based in Feltham which were later replaced with components on the new systems housed in Belfast.

9. The four RDMC 'streams' were designated RDDT (RDT Testing – initial look at the Reference Data to see if there were any obvious mistakes – Test in this context is a slight misnomer), RDDIP (RDP Internal Proving – more exhaustive checks on the Reference Data before passing on to the Post Office RDT for their proving), RDDOP (Post Office RDT proving) and RDDPL (Live data). The release of Reference Data to each stream was controlled by RDMC workstations, which were only available to ICL/Fujitsu RDT. Team members in RDT had varying levels of control they could exercise in moving data through the streams and only more senior members of the team were allowed to 'release to Live'.

KEL System

10. The purpose of the KEL (Known Error Log) database was to assist looking into a technical issue to determine if the issue, or a similar issue, had been seen before and if there was a resolution or workaround or possibly a request for more information.

- 11. I have been asked about the KEL system adequacy as it has been many years since I used the KEL system I do not feel able to provide a complete response to this question. My recollections of the KEL is that sometimes it would be very helpful and at others difficult to track down similar issues. Often the problem of finding the entry you wanted was that the description of the problem in a KEL could be written from the perspective of the technician providing the resolution rather than how the problem manifested itself to the user. This was not a specific problem in the context of the Horizon system but a generic problem across many KEL type systems.
- 12.1 have been asked about the KEL Process as this is many years ago I cannot be certain that I can remember the specific process I would have used with any KEL system used within the Horizon system. In general with any KEL type system you enter a set of search criteria which would offer you a number of KEL entries to review. You may then have had options to refine your search within those offered for review or you may have had to look through them.

PinICL and PEAK systems

- 13.I have been asked about the PinICL and PEAK systems If I remember correctly these two systems were developed and run by the SSC. I believe that they were both adequate for their intended purpose.
- 14. I have been asked about the assignment and priority pf service tickets to the best of my recollection service tickets were assigned to the team responsible for the major component identified on the ticket. If this turned out to be the wrong team the ticket would be transferred to the most appropriate team.

Tickets were given a priority at creation time, the priority based on the severity of the problem. The priority could be changed during the lifetime of the ticket.

- 15. Service ticket closure to the best of my recollection a service ticket would be closed under one of the following conditions:
 - 15.1 the identified problem was already recorded in an earlier ticket or could be coupled with another ticket;
 - 15.2 a software fix was issued to overcome a defect in the software;
 - 15.3 a workaround was identified, possibly as an interim solution pending a longer term fix or development of a change/new part of the Horizon system;
 - 15.4 the problem as identified was due to a misunderstanding of the process;
 - 15.5 there was insufficient evidence to identify the described problem as such this ticket may have been re-opened in the future

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- 16. During the time that I was the Reference Data Manager neither I, nor any of my team members, were members of the SSC My team could well have been involved in helping the SSC when problems included Reference Data. As I was not a part of the SSC I do not feel able to comment on the way the SSC service was provided.
- 17.1 understood the role of the SSC to provide Post Office and all of their staff, whether within the Post Office organisation or the staff at Post Offices, support for all aspects of the use of the Horizon system and to investigate the causes of failures and possibly supply interim fixes or workarounds. I seem to remember that there was a fraud section either within the SSC or elsewhere

in the support service structure.

- 18.I cannot remember how many staff there were in the SSC or precisely what were their positions and roles. As I was not a member of the SSC I do not even know if I could have answered this any more accurately at the time I was working.
- 19.1 have no knowledge of the specific requirement for working in the SSC. I do know that many of the people I worked within the SSC were technically very competent at their jobs and would have doubtless been chosen because of their previous experience.
- 20.1 have been asked about training, work instructions, relationship to other helpdesks, 4th line support, SMC I cannot make any comment on these questions in relation to the SSC.

Identification of bugs, errors and defects

21. I have reviewed the bugs referenced in Appendix 1 of *Bates and others v*. *Post Office Limited (No. 6) "Horizon Issues" [2019] EWHC3408 (QB).* I have no specific recollection of any of the bugs or any mechanisms employed to investigate or fix them. I am also unable to give any information how the SSC approached resolution of the bugs. I can say that I was never aware of any pressure to avoid finding or fixing bugs nor for passing information to Post Office employees. There may have been times when we were asked to hold back telling Post Office whilst the problem was investigated and we may well have been asked to allow senior management to inform Post Office in the first instance but ultimately I believe we were allowed to discuss issues with our counterparts in the Post Office.

Remote Access

- 22. Once more I have to stress that I was never a member of the SSC. However I, and some members of my team, had remote access to the RDT parts of the Horizon system in order to use the proving equipment specifically available to RDT.
- 23.1 have been asked a number of questions in relation to remote access.
 - 23.1 I and my team would use Remote access for the purpose of processing Reference Data from receipt from Post Office through the systems available to the ICL/Fujitsu Reference Data teams prior to release to the live system;
 - 23.2 RDT had a number of RDMC workstations which were used to control the delivery of Reference Data to the stages of processing through the RDT environments and release to the live environment;
 - 23.3 RDT had access to correspondence servers within the RDT environment but not to the live correspondence servers;
 - 23.4 RDMC workstations were only available in the secure environment in Bracknell. In addition, some of my team, had remote access to RDT systems through a Windows based laptop but that access only became available when the updated systems based in Belfast became operational. I cannot name any specific tool;
 - 23.5 As mentioned above, RDMC workstations were only available within the secure environment in Bracknell. Access to Bracknell was with an electronic identification pass which was required to enter the Bracknell building and then to any floor/office area to which the individual was permitted access. Where remote access was permitted we had to use passwords and a device which was time-syncd with a security server

within the live system (I believe housed in Belfast);

- 23.6 I have no knowledge of the audit data from any of the security systems;
- 23.7 To the best of my recollection we had read only access to the databases on the RDT systems, and the Live RDMC database. The only way anyone could change Post Office Reference Data was by supplying a new file of data to the RDMC. I seem to remember that we had slightly more access to RDT correspondence servers. However, if any changes were made within the RDT environment, such changes could not be transmitted to the live service.

General

- 24.1 do not feel competent to answer the question about the level of information or advice given to SPMs as I was never directly involved with the provision of that information.
- 25. I have been asked about the causes of problems with the Horizon system This is an extremely difficult question to answer, especially so in my case as I was not aware there were problems of the level that have come to light since I retired. I can say that there were times when Post Office technical advisors would ask for changes or developments on the Horizon system without consulting anyone who used the system and this may well have resulted in confusion in the Post Offices. Several of the staff on the Post Office RDT had worked in Post Offices and were familiar with the way in which things were done in a Post Office and yet their views were often not sought or simply ignored by those in the Post Office requesting the change/development. I believe that the early members of the Post Office RDT, who had to prove the Reference Data, were chosen for the very reason that they had experience of

how things were done in Post Offices and would have been an excellent source of information to those in the Post Office who were specifying the requirements for changes/enhancements to the Horizon system. There were several occasions when I attempted to get the person in the Post Office who had specified a change/enhancement to modify the methodology to conform to the way in which the Post Offices transacted and to discuss the way the counter presented the transaction with the Post Office RDT.

26. I have been asked, with hindsight, what if any, changes to the support services provided by Fujitsu would have improved the advice and assistance received by SPMs – as I was never directly involved in the support services referenced I do not believe I can offer any constructive criticism. The role of my team was to support the Post Office RDT and I believe that we did that effectively whilst I was the manager of ICL/Fujitsu RDT.



Statement of Truth

Dated: 16 March 2023