

Message

From: Jonathan Gribben [GRO]
on behalf of Jonathan Gribben [GRO]
Sent: 18/10/2018 15:24:07
To: Catherine Hamilton [GRO]
CC: Rob.Houghton [GRO]; Jane MacLeod [GRO]; Rodric Williams [GRO]; Mark Underwood1 [GRO]; Andrew Parsons [GRO]; Lucy Bremner [GRO]
Subject: Jason Coyne's Report [WBUDUK-AC.FID27032497]
Attachments: 180503R1935 Expert Report of Jason Coyne 01-01.pdf; Annex A - SLA Summary NEW WE 06072014.xls.pdf; Annex B - Transaction Correction Diagram v2.pdf; Appendix G - Failure Points.pdf

Catherine,

Please find attached the expert report served by the Claimants' expert, Jason Coyne. The report itself is not privileged but our comments on it are, so please do not forward this email.

The headlines are:-

1. it is 225 pages of professionally presented work;
2. Coyne has not discovered any smoking gun then shows that Horizon has a fundamental defect. Indeed, you could read parts of his report as saying that Horizon is fairly robust;
3. his general approach is to list out all the bugs he has found in the Horizon technical documents and then draw the conclusion that "*it was highly likely for bugs / errors / defects to have the potential to*" cause shortfalls and undermine the reliability of Horizon; and
4. Robert Worden's initial view is that there is a lack of analysis of the bugs identified by Coyne – Coyne does not seek to explain their effect or extent. Without this analysis, Robert believes it is a leap to say that a simple list of bugs justifies Coyne's conclusions.

I have summarised some of the key points (as we see them based on an initial look at his report) against the broad summary of the issues that Rodric provided to you on 21 September in the table below.

Robert would like comments from Post Office on specific sections of the report – I'll send you a separate email on that shortly.

Feel free to give me a call if there's anything you'd like to discuss.

Kind regards

Jonny

Issues	Coyne's comments (paragraph number)
<p>The robustness of Horizon, including:-</p> <ul style="list-style-type: none"> the extent to which bugs, errors etc. in Horizon could undermine Horizon's ability to process and record transactions and/or cause shortfalls; and the controls and measures in place to address them. 	<ul style="list-style-type: none"> the present day version of Horizon is relatively robust "<i>in the spectrum of computer systems used in businesses today</i>", but as it has undergone "<i>major modifications</i>" it is likely that it was less robust when it was first commissioned (3.7); "<i>In my position as expert I am unable to estimate the level of the Horizon system's robustness. Given the size and age of Horizon, I would however make the expert assumption (based upon systems of similar magnitude), that there are not many people who could</i>" 5.88); it is clear that significant errors in data recorded within Horizon have occurred (5.154); and it was highly likely for bugs/errors/defects to have the potential to both (a) cause apparent or alleged discrepancies; and (b) undermine the reliability of Horizon to accurately process and record transactions (5.196).

<p>"Remote access", including:-</p> <ul style="list-style-type: none"> whether Post Office and/or Fujitsu were able to access transaction data remotely; and whether Post Office and/or Fujitsu have had the ability/facility to insert, inject, edit or delete transaction data or data in branch accounts. 	<ul style="list-style-type: none"> The nature of providing a support service as Fujitsu do would require as a design principle that the Horizon solution should be completely remotely manageable (9.1); it has not yet been identified that transaction data was altered at the counter (9.6), but Richard Roll says that it happened (9.10); Fujitsu did and do have the ability and facilities to access and modify transaction data. Fujitsu staff were able to implement changes that had the potential to affect transaction data both without the knowledge or consent of the Subpostmaster and/or Post Office. In addition, a number of external audits commissioned by Post Office report that the appropriate control mechanisms to prevent mistakes being made were not followed (9.71). global users could input transactions as if they had been entered at a physical branch (9.18).
<p>The Horizon facilities available to Postmasters to identify problems with Horizon and/or challenge its record of branch accounts.</p>	<ul style="list-style-type: none"> Coyne describes and does not criticise the daily, weekly and monthly processes and comments that the weekly balance process "should also help to detect any discrepancies" (7.25); however, he goes on to say that Subpostmaster feedback appears to highlight amongst many other things an absence of support and training to assist them with being able to find and resolve mistakes (7.42 – note that this is introduced in the conclusion section).
<p>The Horizon facilities available to Post Office to identify possible causes of branch shortfalls.</p>	<ul style="list-style-type: none"> Post Office has access to "a suite of reports which should...allow Post Office to identify the occurrence of alleged shortfalls in the Horizon system" to the extent that they can be identified (i.e. Coyne accepts that it isn't possible to spot certain types of error by reviewing transaction data (8.19).
<p>Reconciliation and Transaction Corrections</p>	<ul style="list-style-type: none"> reconciliation does not necessarily ensure all anomalies or discrepancies are resolved as this becomes a more manual process; and manual processes applied to correct data anomalies also have the potential to introduce further errors (both 6.45).

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