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Claim No: HQ16X01238, HQ17X02637 & HQ17X04248

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

ROYAL COURTS OF JUSTICE

B E T W E E N:

ALAN BATES & OTHERS

Claimant

AND

POST OFFICE LIMITED

Defendant

SECOND WITNESS STATEMENT OF STEPHEN PAUL PARKER

I, STEPHEN PAUL PARKER of Lovelace Road, Bracknell, Berkshire RG12 8SN WILL SAY as follows:

1. This is my second witness statement in relation to these proceedings. The facts set out in this statement are within my own knowledge, or if they are outside my knowledge, I have explained the source of my information or belief.

RICHARD ROLL'S SECOND STATEMENT

2. I have previously commented on the first witness statement of Richard Roll dated 11 July 2016. ~~However, in a number of respects that statement was unclear.~~ In his second statement dated 16 January 2019 (**Roll 2**), Mr Roll has clarified some points and made some new points. I have been asked to comment on these points and I do so below. Unless indicated otherwise, in this statement I describe the position as it was when Mr Roll was employed by Fujitsu and references to ~~Horizon~~paragraph numbers are references to paragraphs in Roll 2.

Hardware failures

3. Mr Roll suggests in paragraph 5 that he encountered a hardware failure on average at least once a month. That seems plausible to me, although it is not clear how Mr Roll defines a 'hardware failure'. To put it into context, there were around 28,000 counters in operation at any one time while Mr Roll was employed by Fujitsu and it is inevitable that hardware failures would occur.

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4. However, Mr Roll's statement that hardware failures "*could and did affect branch accounts*" gives a misleading impression. It would be more accurate to say that while a hardware issue could very occasionally ~~prevent a branch's ability to carry out certain transactions~~do so, the vast majority of hardware issues were not capable of having any impact on a branch's accounts in terms of ~~creating~~leading to a financial discrepancy.

5. At paragraph 6 Mr Roll states that the "*most extreme case that he can recall was a complete failure of a counter to communicate with the server…*~~".~~" These are the stuck transactions that I referred to at paragraph 43 of my first witness statement (they were also known as 'marooned transactions'). These stuck transactions could only result in a discrepancy in a branch's accounts in very limited circumstances:-

5.1 ~~in~~In the event of a hardware issue preventing transactions conducted on one counter from being replicated to the other counters in a branch, when a branch reported the issue, Fujitsu engineering service would go to the site to attempt to resolve it. As part of this engineering visit, actions would be taken to ensure that transactions were replicated correctly. I am aware of a facility used by engineers in these cases known as the "recovery laptop" but cannot describe the process~~; and~~.

5.2 ~~it is~~It was only in the very rare circumstances where~~:~~ (1) Fujitsu could not locate or replay a replicated copy of the transactions ; and (2) the branch was unable to advise which transactions had been carried out on the counter after it stopped communicating ~~with the server~~ that there might be a discrepancy in the branch's accounts as a consequence of the issue. In these cases Fujitsu would notify the Subpostmaster and Post Office and provide any supporting information that Fujitsu was able to gather~~, such as [Steve - please provide examples of the supporting information that Fujitsu might be able to gather]~~. This will be evident from transfers by SSC to MSU to raise BIMS.

6. At paragraph 7 Mr Roll suggests that there were "*PIN pad problems which caused issues in branches and problems with other peripheral devices such as keyboards which only occurred intermittently*". I note that he does not explain if or how in his view such issues might ~~cause~~have led to discrepancies in a branch's accounts (indeed he says that he cannot recall the specific detail of the issues). I am not aware of circumstances in which ~~PIN pad or keyboard issues led to discrepancies in a branch's accounts~~they would have done so. I suppose it is theoretically possible that there could be a problem where a Subpostmaster pressed one key and another number appeared on the screen, but that would be obvious to the Subpostmaster when looking at the screen. In relation to keyboards,

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it may also be worth mentioning that if the physical keyboard did not work, there was an onscreen keyboard available.

7. At paragraph 8 Mr Roll describes "*one particular case where branch data was not being replicated from a mobile post office correctly and it appeared that the subpostmistress was turning off the power mid transaction*". He goes on to say that "*[I] discovered that the button which should have put the laptop into standby mode was actually switching off the power, resulting in the disk crashing. I disassembled the laptops to confirm this*". At my request, my colleague John Simpkins, Senior Consultant, carried out a search of the incident management system and found two incidents (Peaks PC0100174 {POL-0271797} and PC0100899 {POL-0272727}) that appear to relate to the work Mr Roll is describing. My colleague undertook a keyword search for incidents containing the words "laptop" and/or "luggable" and/or "outreach", all of which are likely to cover the events described by Mr Roll in paragraph 8 of his statement and ~~finally found~~then added the ~~incidents using~~word "switch" to locate these Peaks. Whilst I have no personal recollection of this matter, based on Mr Roll's narratives on the Peaks it appears that:

7.1 a hardware fault was identified from equipment on "*ONE*" (Mr Roll's capitalised emphasis from his narrative in the Peak) internal test rig {POL-0271797}. I assume from the context that this equates to one hardware item, although ~~I suppose~~ it could conceivably relate to one test rig which comprises a number of counters;

7.2 when a hardware unit was retrieved from the site reporting the issue, Mr Roll found the unit to be "*working correctly, no further action required*" {POL-0272727};

7.3 there is nothing in Mr Roll's incident narratives which record any discussion with Mr Peach (Mr Roll's Manager at the time and whom I worked with for 17 years, before he retired in 2010), its outcome or the provenance of any information Mr Roll may have had relating to a faulty batch of hardware, although I note that no such information is referred to in either Peak;

7.4 if Fujitsu was aware of a batch of faulty laptops as Mr Roll suggests it should and I believe ~~that it~~ would have been investigated and the faulty batch ~~would have~~ been recalled. It was not in Fujitsu's interests to have faulty equipment in circulation. I would also have expected to have seen an update of the incident describing any conversation Mr Roll had with engineering but no such update is present. Further, I do not believe that Mr Peach would have kept an issue such as this quiet as Mr Roll seems to be suggesting; and

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7.5 again, I note that, Mr Roll does not explain whether or how such an issue could have led to a discrepancy in a branch's accounts and I am not aware of any circumstances in which that would happen. For completeness, I also note that laptops were only used in mobile branches (also known as outreach branches) and any potential impact would be limited to those branches. Although I don't have exact figures, I understand from my colleague Matthew Lenton that mobile counters represented around 1% of the total number of counters in use in the Post Office network in 2006 (data is not available for the period that Mr Roll was employed by Fujitsu). ~~[Matthew - please provide the document that this information is taken from]~~

Transactional Integrity

8. At paragraph 9 Mr Roll alleges that "*[D]ata corruption and glitches sometimes meant that transactions were not zero sum*". He recalls "*[…] on more than one occasion where subpostmasters had problems with a deficit showing in their accounts, and then as a result of working through a process to try and resolve it, the deficit doubled*". Given the lack of detail I cannot be definite, but ~~after consulting my colleague Gareth Jenkins (Retired Horizon Architect)~~ I understand that Mr Roll may be referring to KEL PSteed2847N {POL-0033658}, which relates to a situation where a user attempted to reverse a Rem In of cash to an incorrect stock unit and, because of a software error, the value of the Rem In was doubled instead. This KEL is referred to in ~~both~~ my first witness statement ~~and both the expert's reports [Steve – how did FJ search for this KEL?]~~.

9. If that is what Mr Roll is referring to, this KEL does not have anything to do with a transaction not being a zero sum. It was first raised on 28 April 2003 and it was agreed that any affected Subpostmaster would be contacted to say that the problem was due to a software error and that they should ask NBSC for balancing procedures {POL-0033658}. The NBSC was also told that the ~~office~~branch would need an error notice for twice the amount of the ~~rem in. Solution~~Rem In. The issue was diagnosed on 28 April 2003 and solution FSTK_2_0_WP16353 was created and sent out as a new software release on 7th ~~of~~ May 2003 so that the problem did not recur {POL-0262279}.

10. I am not aware of any ~~circumstances~~case in which baskets were not zero sum (i.e. any ~~circumstances~~case in which a non-zero-sum basket was accepted into Horizon), although given the lack of detail in Mr Roll's statement on this point it is difficult for me to state definitively that such an issue never arose. I would expect ~~these circumstances~~any such issue to result in a receipts and payments mismatch which would be~~:~~ (1) picked up by Fujitsu's reconciliation reporting or

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~~event~~ monitoring[1] (at HNG-X) ~~or~~ and~~;~~ (2) visible to the branch when they balanced at the end of the trading period. Either of these would result in investigation and resolution by the SSC team.

11. In paragraph 10 Mr Roll is describing an issue caused by reference data (which defines the path to be taken from the payment of a bill to the third party actually receiving money) being incorrect. I cannot recall any instances of incorrect reference data misdirecting payments while Mr Roll was employed by Fujitsu, but reference data errors do happen and I recall an incident in 2010 involving the Highland ~~Authority~~Council. These are invariably human errors, in that mistakes can be made by individuals when setting up reference data but ~~only then if it was only missed but only then if it was also~~these also have to be missed during validation and verification before release.

12. When incorrect reference data is used, payment ~~goes~~could go to the wrong Post Office client and the customer's bill is not settled, but there ~~is~~would be no impact on ~~the~~a branch's accounts. If a customer came back to the branch and pointed out that they had paid a bill that a utility provider, for example, was chasing them for, then I would expect the Subpostmaster to escalate this via the Helpdesk / Post Office, rather than processing the payment again without taking any money from the customer. This sort of issue would be picked up quickly. ~~In the Highland Authority issue referred to above, [WBD to summarise what happened].~~ Peak PC0215488 [WBD to add doc reference] shows that the Highland Council issue was reported at 08:21:53 on 1 February 2012 and by around 11:00am a reference data download had been expedited to fix this issue.

13. At paragraph 11 Mr Roll alleges that there were problems which sometimes arose after Subpostmasters used the recovery process. He states that "*[T]his might suggest that there was a problem with the recovery process itself, or at least that it was not as straightforward as it should have been*". He does not articulate any specific issues, which makes it difficult to comment.

14. At the time Mr Roll was employed by Fujitsu there were two transaction recovery processes:~~ 13.1~~ AP recovery; and~~13.2 B~~banking recovery. ~~14.~~ I do not have personal experience of these processes, but am aware that they are set out in the branch documentation that Post Office issues to Subpostmasters~~. The~~ and their design ~~of Horizon in this regard~~ is covered in APS Counter and Banking counter

[1] The main source of monitoring in Legacy Horizon would be MSU reporting, but I would expect some non-R&P specific counter eventing to indicate problems. For example, in PC0123699 [insert POL number] where a critical event "*[f]ailed to generate EPOSSCore transaction grammar*".

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design documentation {POL-0107388} and {POL-0061134}. ~~15.~~ By t heir nature ~~a~~, recovery processe~~s~~ require~~s~~ a user to complete a number of steps and where several steps are required mistakes can be made. F or that reason, recovery processes are designed to be as simple as possible ~~and~~ . I note that Mr Roll has not explained how he believes the recovery processes described above could have been made more "*straightforward*", which again makes it difficult to comment.

15. ~~16.~~ Mr Roll states that "*Fujitsu's stance was generally that if there was a problem with transactions following a recovery process and if SSC could not identify the cause, then the problem must have been caused by the Subpostmaster not following the recovery process properly*". I agree that if Fujitsu was unable to identify the cause of a discrepancy that was said to relate to a recovery issue, having investigated the matter, the likely conclusion would be that the discrepancy (if there was one ~~resulting from~~following the recovery process) was probably the result of human error. The key point here is that the SSC would thoroughly review all of the available evidence, ~~and~~ I am confident that if there had been a software issue in relation to the recovery process, the SSC would have identified it or in the very unlikely case that we could not determine root cause, would have at least documented its symptoms. Having conducted a careful investigation which did not reveal any s oftware issues, human error would be by f ar the most likely explanation.

Transaction Corrections (TCs) and Patterns of Software Errors

16. ~~17.~~ Mr Roll states at paragraph 12 that he cannot recall Fujitsu carrying out any analysis of TCs to try and identify if there had been an underlying software error. TCs were not introduced until 2006, some two years after Mr Roll had left Fujitsu. During the period that Mr Roll was employed by F ujitsu, Post Office sent Error Notices to branches. Fujitsu would not have analysed Error Notices. They were not within its remit, being dealt with by Post Office on the basis of its own back office processes.

17. ~~18.~~ I agree with Mr Roll's statement at paragraph 13 that "*[A]lthough it is correct that high frequency problems were found during testing, it was impossible to test for every permutation of data, and testing did not result in the identification of all errors*". The same could be said of every computer system in the world.

18. ~~19.~~ At paragraph 14 Mr Roll disagrees with a statement made by Dr Worden that "*all software errors would have been picked up by processes which were in place, or that the likelihood of software errors staying disguised as human errors was very small*". Mr Roll does this on the basis that "*subpostmasters would have been held responsible for problems which had not at any time been identified as software*

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errors, either because they could not identify the problem and did not pursue these with Post Office or Fujitsu, or because when they were raised we (Fujitsu) were ultimately unable to identify the problem at the time."

19. ~~20.~~ Fujitsu has mechanisms in place for detecting potential issues. In paragraph 26.1.1(b) of my first statement I briefly explained that the System Management Centre monitors system events and I briefly described the work of the Communications Management team in paragraph 26.1.2. Each of these teams would generate support actions based on system generated event information. It is also the case that the sheer number of Subpostmasters using the service and reporting issues via the Help desks make it very unlikely that there is any significant number of hidden errors. These mechanisms are so effective at identifying when bugs are a cause of problems and it would be very rare for a bug to not be detected.

20. ~~21.~~ Once an issue has been raised, Fujitsu is experienced in providing support and will go to great lengths to investigate the root cause ~~of an issue~~. In paragraph 61 of my first statement I explained ~~at paragraphs 61 – 61.10~~ that Fujitsu use a custom solution, developed and administered by the SSC, which allows us to record support knowledge into a Known Error Log (**KEL**). KELs record support knowledge which is intended to assist staff in the support and understanding of the Horizon system.

21. ~~22.~~ Mr Roll's statement that "*subpostmasters would have been held responsible for problems which had not at any time been identified as software errors… because when they were raised we (Fujitsu) were ultimately unable to identify the problem at the time*" assumes that if Fujitsu was not able to get to the root cause of an issue, it must have been a software error rather than a human error. But as I explain in paragraph 15 above, if Fujitsu was unable to identify any software issues after carrying out a careful investigation, human error would be by far the most likely explanation.

22. ~~23.~~ On the odd occasion Fujitsu may identify that there is a software issue but we may not get to the root cause of an issue~~. This~~ and take a decision not to take matters further. Such a decision would generally be where an issue is determined to be low priority and low impact. ~~Such a decision~~ It would be made by the development / architectural group in conjunction with POL, not by the SSC. If the issue was causing a financial impact in a branch's accounts, it would be treated as high priority and high impact as I explained in paragraph 62.8 of my first witness statement. In such cases, the Fujitsu Support and Development organisation would keep going until it identified the cause of the software issue. This might even include generating bespoke code in the application to generate additional diagnostics (Mr Roll would not have carried out such work). Even a problem

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exhibiting minimal financial loss (in terms of value) would be treated as essential to fix for the financial integrity of the system.

23. ~~24.~~ I think that Mr Roll may be trying to suggest that Fujitsu were quite happy to assume that issues were the responsibility of Subpostmasters. That is not the case. We investigated matters thoroughly and if we identified an error in Horizon, we dealt with it appropriately. Our investigative and analytical procedures have always been thorough in my view and while I obviously cannot say that in each and every case our diagnosis was correct, I am confident that that was the case in the overwhelming majority of cases.

Testing of software and development fixes

24. ~~25.~~ At paragraph 15 Mr Roll alleges that during his time at Fujitsu there were "*budget pressures and redundancies which impacted system development and testing*" and which "*negatively affected the test regime*". It is true that Post Office would want to resolve issues quickly, in particular those which were causing major issues ~~quickly,~~ and it is also true that, like any other business, Fujitsu operated within a budget. However, points such as this did not affect the quality of development or testing that was done. Fujitsu would not knowingly release something that did not or might not work and there were often times when releases were delayed to give Fujitsu more time to carry out testing. I would also mention that Mr Roll would not have had any first hand visibility of budgets in his role.

25. ~~26.~~ At paragraph 16 Mr Roll alleges that the SSC team and Fujitsu were generally under pressure "*due to an awareness of the financial penalties imposed by Service Level Agreements between Post Office and Fujitsu*" . At paragraph 43 of my first witness statement I explained that the possibility of financial penalties or Service Level Agreement breach was never a factor which affected the diligence with which SSC would investigate an issue. By way of further explanation:

25.1 Schedule 15 to the "Service Level Targets for Horizon Services" {POL-0084662}~~, which is schedule 15 to CA/SLA/002 [WBD to insert description]~~ contains the agreed service levels and remedies in force as part of the "varied and restated" Codified Agreement between Fujitsu and Post Office dated ~~[WBD to insert date]~~.30 November 2005. The Service Level Agreements were concerned with the overall flow of data through the estate and the need to ensure ~~requisite~~that transaction data ~~by~~reached its destination within certain time limits.

25.2 ~~27. Whilst there were financial penalties for late transaction data or for data that did not have all of the required fields populated when itwas sent to Post~~

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~~Office, there~~There were no specific financial penalties relating to the SSC processing of incidents. ~~{POL-0106081}, which is the~~The Service Description for Third Line Software Support Service ~~(I explained at paragraph 26.3 of my first witness statement that the SSC provide 3rd line support) explains that the SSC had~~{POL-0106081} confirms that:-

"*There are no specific service targets linked directly with this service [i.e. the SSC]. However, attainment of all data delivery Service Level Targets, as detailed in Annex 2 of Schedule 15, ~~was~~is directly related to the successful provision of this service.* ~~The SSC did have*~~ operational targets to turn incidents around based on an order of priority*, ~~but no financial penalties were applied if they were breached. Anyway*~~, any increase in priority would not **impact the diligence with which work was done.~~ *"

25.3 ~~28.~~ Penalties on delivering transactions were assessed on a per transaction basis. Therefore, if ~~there were~~for example a large number of transactions did not reach their destinations on tim I suppose that penalties could in theory add up to the type of figure Mr Roll refers to in paragraph 16. However, any penalties would not have changed the SSC's attitude as to the level of diligence carried out. I agree that such penalties were sometimes talked about in the support community but as far as I am aware Fujitsu was never charged any large penalty. In my opinion that is because Fujitsu did a good job and not because they cut corners to avoidthem, as Mr Roll seems to be suggesting. I would say that it is the nature of the support environment that you only ever see the transaction that goes wrong andare not conscious of the millions of transactions that worked faultlessly. This can skew one's perception of the system as a whole.

25.4 **The SSC had*** operational targets to turn incidents around based on an order of priority*. **As explained in paragraph 22 above, if an issue was causing a financial impact in a branch's accounts, it would be treated as high priority and high impact by SSC. However***, any increase in priority would not ***adversely** *impact the diligence with which work was done. *

Identifying Unexpected Events

26. ~~29.~~ I agree with Mr Roll when he says that "*Horizon's ability to identify unexpected events depended on how it was designed and programmed*" at paragraph 19. It is correct that if the SSC found something that should have been picked up by the system they would notify developers so they could fix the softwareor ensure that a warning was generated to cause support action to take place. Anything which had the potential to affect branch accounts would be considered to be high impact and was raised with the development group for root cause fix.

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Transaction Injection in Old Horizon

27. ~~30.~~ In paragraph 20 of Roll 2, Mr Roll describes a process by which transactions could be inserted via individual branch counters by using the correspondence server to piggy back through the gateway. He has not previously made this point clear. Now that he has, following a discussion with ~~[insert name of colleague and job title]~~colleagues who performed such actions I can confirm that this was possible. I did not mention it in my first witness statement because, when faced with a less clear account in Mr Roll's first statement, my recollection was that if it was necessary for the SSC to inject a transaction data into a branch's accounts, it would have been injected into the correspondence server ~~and~~ (injecting via the server was the default option which was followed in the vast majority of cases).

28. ~~31.~~ PC0175821 {POL-0345994} is an example of data being injected into the counter. I was not involved in this incident, but having reviewed the Peak I can see that :-

28.1 this incident concerned five corrupted bureau transactions on the counter~~.~~ ;

28.2 Post Office contacted the manager and they did another balance with the correct declarations. This resulted in a net gain of £~~10.85.~~ 10.85;

28.3 Post Office agreed to the SSC taking corrective measures by inserting messages which caused an equal but opposite effect and this resolved the issue~~. Details~~;

28.4 the messages were inserted with the additional property <Comment:PC0175821> to allow them to be identified in the audit trail; and

28.5 details on the email conversations with POL (including their authorisation) are attached to the Peak along with confirmation that the Branch Manager was contacted.

29. ~~32.~~ At my request, my colleague John Simpkins (Senior Consultant), carried out a search of the incident management system for incidents which required injecting data into the counter. From the results I can determine that ~~thiswas only done in very specific circumstances [Steve - can you ask someone to list these circumstances please?]. The~~this was only carried out in the following circumstances while Mr Roll was employed by Fujitsu:-

29.1 fixing a Riposte Index at the counter;

29.2 removing a historic message that was influencing the balancing process on a replaced counter;

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29.3 correcting configuration data after a PinPad change;

29.4 removing redundant configuration items;

29.5 the example given above involving five corrupted bureau transactions; and

29.6 removing historic recovery information.

30. In total, there were 14 such incidents. Of those, only [insert number] involved transaction data being injected into the counter. When this happened, the transaction would appear on the transaction logs available on Horizon as if it had been carried out by the user that was logged into the counter at the time (if nobody was logged on, the User ID would be missing). ~~When~~However, when injecting such a transaction, the SSC user w~~h~~ould ensure that it was clearly identified in the audit trail as having been inserted by SSC. Examples of such identification I am aware of are the use of a SSC user as the ~~ClerkID~~Clerk ID and / or details of the incident number as an additional property.

31. ~~33.~~ At paragraphs 21 and 22 Mr Roll states that both ~~himself~~he and the "*SSC team generally had the ability to inject data*" and that "*there was no limit on the type of transaction that we could insert*". At paragraph 20.2 of my first statement I said that "some" members of the team could do this, but this was badly stated. Everyone in the SSC team had the ability to inject data. My intention was to express the fact that only limited numbers of SSC technicians ever needed to ~~construct~~inject financial data.

32. ~~34.~~ There were (and are) strict procedural controls in place relating to injecting transaction data into branch accounts~~. The Access Control Policy can be found at Exhibit SP2 pages x to x [WBD note - this has not been disclosed –to be reviewed]. The policy requires required records of the actions to be taken on incident narratives. While the SSC always used change control for financial changes, it was only later, (approx Oct 2006 onwards) as change control systems were extended within the Post Office account, that OCPs and OCRs documented the BAU (e.g. EOD and Marooned) support actions taken. For certain types of change (depending on impact), approval for the change to be obtained from the service team and the customer would be required. If the change resulted in a financial impact, another technically competent person was required to [Steve – was this someone higher up in the chain of command?] oversee the change as it was being made. These circumstances were and/are very rare. *The SSC was (and is) hugely reluctant to change financial data as that was not their job and they recognised the seriousness of doing so.—*~~ * and I am not aware of any occasions on which they were not

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followed in practice. The Access Control Policy can be found at Exhibit SP2 pages x to x [WBD note - this has not been disclosed]. Section 4.5.5 states that:

"*support users should only have read only access to the supported systems, except for: SSC support managers (not normal support users) "correcting" data under controlled conditions. (Data may need to be corrected where it has been corrupted by faulty code.) Correction of data must be subject to agreed authorisation procedures.*"

33. Section 4.5.5.4 goes on to state that:

"*updates to code or data by application support staff require two staff to be present when the change is made and all such changes to be audited, identifying what has been changed (before and after values) and the individual who made the change.*"

34. *The SSC was (and is) hugely reluctant to change financial data as that was not their job and they recognised the seriousness of doing so. *

35. With reference to Dr. Worden's statement that "*as for transferring money, Horizon includes no functionality that allows payments to be made to external parties or account*", at paragraphs 20.1, 20.3, 21 and 58.4 of my first statement I said that money could not be transferred, by which I mean that it could not be transferred into a third party's bank account. ~~Following a discussion with Gareth Jenkins (retired Horizon Architect),~~ I have given this matter further thought and discussed it with my colleagues and we have now theorised that someone could have carried out a Post Office transaction, such as a GIRO transfer or a utility bill payment. A GIRO transaction would have been detected as part of Post Office's reconciliation processes because there would be no accompanying paper document. There is no accompanying paper document for a utility bill payment, so in theory such a transaction would not be detected through reconciliation. I am not aware of any such activity ever taking place and if it had occurred it would have resulted in instant dismissal.

Rebuilding branch transaction data

36. At paragraph 23 Mr Rolls describes the process of "*rebuilding branch transaction data*". As part of this process he alleges that transaction data was "*corrected*" by copying it to the SSC, altering it whilst on the SSC's computers and then downloading it back to the branch and that there was a risk of data not being accurately copied across or even deleted. He goes on to say that this was sometimes done without a Subpostmaster's knowledge at paragraph 24.

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37. In paragraphs 55.3 and 55.4 of my first statement I described what happens if one of the sets of data on a branch counter became corrupted. I explained that:-

37.1 while this process involves deleting and replacing a set of data, no new data is produced; all that happens is that the replicated data is used to replace the data that has become corrupted from another counter in the branch; and

37.2 it would have been necessary for the SSC to inform a branch before carrying out this task because it is likely that any attempt to use that counter would fail while the process was being carried out.

38. ~~In~~For completeness, in the rare circumstances where it was necessary for Fujitsu to rebuild transaction data in Legacy Horizon, there were three possible scenarios [which are set out in {POL-0107388}: ~~the first is~~

38.1 when a counter ~~fails; the second is a counter has a "blue screen of death"; and the third is package collisions on networks. 39. When a counter fails and there is~~failed and there was a complete replication of that ~~counters~~counter's transactions elsewhere, Fujitsu simply delete~~d~~ the message (transaction) store on the faulty counter and ~~allow~~used the standard facilities of the Riposte software to re-build the data from the replicated copy. In this scenario, the branch would be unable to use the counter while this process was carried out (it would be in "recovery mode");

38.2 ~~40. Where~~where no replicated copies of the transactions exist~~ed~~, Fujitsu would physically retrieve the disk from the ~~Counter~~faulty counter. The disc ~~tells Fujitsu~~should hold all of the transactions that ha~~ve~~d taken place~~. Fujitsu can~~ on the counter. At its own office, the SSC would extract the transaction data and put it into a ~~replaced~~new replacement counter without amending th~~e~~at data. The SSC would need the Subpostmaster's memory card (AKA PMMC) to de-crypt the data. This was a physical card (a Subpostmaster had two) and Fujitsu would have to borrow one – ~~this shows that~~so the Subpostmaster ~~had to~~would know what was ~~going on. One of these cards has to be present in the interface slot in order for the Subpostmaster's counter to decrypt office data and function. The Subpostmaster can be confident of the returned card by simple trial and error. 41.~~ happening. If Fujitsu were to ~~remove~~change anything, it would be to remove the envelope around the transaction data. The envelope contains the system admin data, i.e. the sequence number of the data and its ID. Fujitsu would not change the transaction data itself and in removing the envelope data, they would simply be allowing the system to automatically re-number the transactions when they were re-inserted. Ultimately, when the counter was replaced at the branch the Subpostmaster would be able to see what Fujitsu had done. I recognise

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this is contrary to what I said at paragraph 55.5 of my first witness statement. This is because I was not entirely clear on the points being made by Mr Roll when I was responding to his first statement.

38.3 ~~42.~~ In the rare cases where Fujitsu ~~were~~was not able to access a portion of the transaction data from the disk then we would ~~use replicated~~replicate transactions as far as ~~they~~we were able to and would notify Post Office and the Subpostmaster of this and any information we had on the extent and potential timing of any missing transactions.

Additional Clarifications

39. ~~43.~~ At paragraph 25 of his statement, Mr Roll states that "*[…] whilst my workload did involve some support to engineers opening and closing branches, I would estimate that this made up only 30% of my work, and the majority of my workload (estimate 70%) involved looking for faults on data stores, preparing reports for the manager as a result of problems with Horizon experienced by the Estate,[…].*" I do not ~~agree with~~accept the alleged percentage split of Mr Roll's workload or his explanation as to why that split was not reflected in Fujitsu's records. At Mr Roll's level, the vast majority of his work would be recorded as attributable to him. As for his suggestion "*a group of perhaps 4 or 5 SSC staff could end up working on the same problem, but for recording purposes this would be assigned to one person […].*", it is possible that workload could be re-assigned to another person in the event of sickness, rare skills being required on more urgent work or a change of skillset being needed as an incident progresses. Wherever possible we would ensure that the same SSC person worked through an incident to resolution to ensure continuity. The suggestion that 4 or 5 people would work on the same problem is an extreme case.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true.

Signed: .....

Name: .....

Date: .....

FUJ00161730

Claim No: HQ16X01238, HQ17X02637 & HQ17X04248

FUJ00161730

Document comparison by Workshare 9 on 29 January 2019 11:58:07

Input:	
Document 1 ID	interwovenSite://DMS.WBD-UK.COM/Active/153977420/1
Description	#153977420v1<Active> - For comparison
Document 2 ID	interwovenSite://DMS.WBD-UK.COM/Active/153972771/1
Description	#153972771v1<Active> - Second Witness Statement of Stephen Paul Parker 29 Jan 19
Rendering set	BD - Basic - colour

Legend:	
Insertion	
~~Deletion~~	
*~~Moved from~~ *	
*Moved to *	
Style change	
Format change	
~~Moved deletion~~	
Inserted cell	
Deleted cell	
Moved cell	
Split/Merged cell	
Padding cell	

Statistics:	
	Count
Insertions	167
Deletions	124
Moved from	4
Moved to	4
Style change	0
Format changed	0
Total changes	299