

WITN09090100

Witness Name: Andrew Wise

Statement No: WITN09090100

Dated: 31<sup>st</sup> of May 2023

## POST OFFICE HORIZON IT INQUIRY

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### FIRST WITNESS STATEMENT OF ANDREW WISE

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I, ANDREW WISE, will say as follows:

1. 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 28 April 2023.
2. I have been assisted by DAC Beachcroft LLP in the preparation and drafting of my statement.

#### **Background**

3. I joined Post Office Ltd (POL) in 1991 where I worked as a Postal Officer counter clerk in a Directly Managed Branch. A Directly Managed Branch (or Crown Post Office as it used to be known) is a branch run by employees of POL with a branch manager and team of counter clerks. I worked in that branch for eight years at which point I joined the Horizon Project in 1999 as a Horizon Field Support Officer (HFSO). The role of the HFSO entailed migrating Post Office branches from a manual accounting system onto the

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Horizon computer system. Following a branch migration, I would spend the next two days in branch providing support to the Sub Postmaster and their staff. I would also provide balance support to the branch on their first balance day to assist balancing for the first time on the Horizon system.

4. I worked as a HFSO until 2001 when I joined the Network Business Support Centre (NBSC) as a Service Support Advisor working on Tier 2. The role of a Service Support Advisor was a non-managerial role equivalent to a counter clerk working in a Directly Managed Branch. This role entailed providing support to Post Office branches and their staff when contacting NBSC with a business-related query. I worked in NBSC until 2004.
5. From 2004 to 2007 I worked in the Training Delivery Team where I was a Training Manger which entailed providing classroom training to new Sub Postmasters and their staff. I also had line management responsibility for a team of four trainers and four schedulers.
6. In 2007 I joined the sales team as a Business Development Manager (BDM). This role entailed providing sales support to several Post Office Branches in a geographical area.
7. In 2008, due to business restructure, my role as a BDM no longer existed and I became a Transitional Manager, this meant I had no specific designated role. While being transitional I worked on several Business projects, the main one being the Horizon Online Project in 2010. On this project I was

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responsible for the line management of a team of five schedulers who would schedule the POL manpower resource to ensure Post Office Branches had support when they migrated onto Horizon Online.

8. In 2011 I joined the Security Team where I was a Security Manager which entailed the investigation of Sub Postmasters and branch staff. In 2015 I moved roles into the Security Intelligence Team, this was still part of the Security Operation Team but focussed more on the physical security of Post Office Branches and the potential threats from outside sources. I currently remain in this role as a Security Intelligence Analyst.

#### Network Business Support Centre (NBSC)

9. The Inquiry has asked me to give an overview of the NBSC. NBSC was the internal helpline and support function for Post Office branches. NBSC consisted of several teams, although I do not recall all the specific teams, I can remember there was Tier 1 and Tier 2 Service Support teams (this was the helpline where I worked), the Service Support Training Team, the Knowledge Base Team, the Call Analysts Team, Business Service Management (BSM) Team, and the Problem Management Team. The Service Support Team was the contact point within NBSC for branches who had queries / issues relating to the day to day running of their Post Office branch. This service was available for anyone who worked in Post Office branches, this included Sub Postmasters, their staff, directly managed branch staff and internal teams such as area managers, trainers, and auditors.

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10. The type of queries which NBSC would deal with ranged vastly from simple questions such as requesting a telephone number for a particular person to more complicated questions such as the process for accepting a Passport Application, or questions around how to balance.
11. The helpline part of NBSC was split into two tiers of support, Tier 1 was first line support and Tier 2 second line support. Any contact made with NBSC would initially get through to Tier 1 who would try to resolve the callers query, and if they were unable to answer the question the call would be passed over to Tier 2. Tier 2 consisted of around fifty to sixty service support advisors who were split across eight teams, each with their own Team Leader.
12. NBSC used a case management system called Remedy to log and record calls from branches. When a call was made into NBSC the advisor would create a new case in this system and enter the branch and caller details along with a brief description of the question being asked, further information would be added in the detailed description field to give a better overview of the reason for the call.
13. Within the NBSC there was a Knowledge Base (KB) Team who were responsible for maintaining and keeping the Knowledge Base articles updated, these were used by Tier 1 and Tier 2 advisors as information sources to enable them to answer queries for branches who had rang in.
14. The Remedy system had a function where the advisor could put in different levels of criteria (there were 4 classification levels) to search the KB for an

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answer to the question being asked. Using the 4 levels of classification, Remedy would then search on the KB and provide the advisor with the KB article relating to the classifications requested.

15. An example of this could be a caller asking whether a customer is able to tax their motor vehicle with an insurance schedule. In this example the four levels of classification could be as follows – Classification 1 = DVLA – Classification 2 = Car Tax – Classification 3 = Insurance Documents – Classification 4 = Acceptable Documents. In this example the KB would present an article explaining what the acceptable insurance documents were when taxing a motor vehicle.

16. Predominantly Tier 1 could only answer questions that were straight forward and where an answer could be found on the Knowledge Base. Tier 1 could not make outbound calls to branches and were restricted to the amount of time they were on a call and were restricted to only giving answers from the KB. If the answer could not be found quickly by the Tier 1 advisor on the KB the call would be transferred through to Tier 2.

17. Normally calls would be transferred live through to Tier 2 from Tier 1 but at busy periods where there were no Tier 2 advisor available the case would be assigned to the Tier 2 case stack in Remedy and the caller would get a call back when that case was picked up by a Tier 2 advisor. Tier 2 had an allocator role each day, this was a Tier 2 advisor who would monitor the Tier 2 case stack and allocate cases to the next available advisor. This ensured that

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calls in the case stack were not missed, and branches got a call back as soon as possible.

18. Tier 2 advisors had more experience than at Tier 1, a lot of the advisors had a background with the Post Office with some coming from Directly Managed Branches and others from the old Regional Helplines. When I joined NBSC in 2001 I joined with several other people who had just left the Horizon Project like myself.

19. Once a call had been concluded the resolution field in the Remedy system would be completed and the case in Remedy would be closed down and the advisor would then be ready to take the next call. I remember that on Tier 2 the average calls per hour would be around four or five, whereas on Tier 1 it would be a lot higher as their calls were a lot quicker.

20. The Service Support teams within NBSC (both Tier 1 and Tier 2) used a telephone system to monitor all activity undertaken by the advisor. Your duty started when you put a code in to log on. Each activity had a separate code to input to demonstrate what activity you were doing. I do not recall the specific codes used now but I do remember that they covered things like wrap up time following a call, admin time, and training time. You also input a code when on a break and when on lunch and a code for comfort breaks (break and lunch times were monitored to ensure you only had your allocated time). On a monthly basis each advisor would get statistics based on the activity of that month, each activity was measured against the number of calls as an average per call. This meant that if you spent too much time in an activity such as

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admin you would be challenged by your Team Leader. Each month the Team Leader would dip sample around ten calls ensuring the appropriate behaviours were adhered while on calls and they would quality assure the information provided. All of this was fed back in monthly 121's

21. The Horizon System Helpline (HSH) was the technical support team for Post Office branches to contact with issues relating to the Horizon computer system. Advisors at HSH were not employees of POL they were employed by ICL Pathway / Fujitsu and were based at a separate location. The team at HSH would deal with technical issues such as equipment faults or faults relating to the Horizon System. I am aware there was a team called SSC which I believe is the System Support Centre, but I am not familiar with their specific role. I am aware that there were several Tiers of support at HSH, and I assumed SSC was one of those Tiers of support.

22. My role at NBSC was such that I do not know the full inter-relationship between NBSC and HSH. I believe that senior management within NBSC and the wider teams such as BSM would have knowledge of this relationship.

23. On a day-to-day BAU perspective NBSC would interact with HSH and often callers would transfer through to HSH, this could be because the caller had pressed the incorrect option on the IVR message when ringing up, or their query could be appropriate for HSH. If a caller claimed, he was experiencing issues with their Horizon System we would transfer that through to the HSH. Likewise, we would often get calls transferred through to NBSC from HSH where HSH deemed NBSC was the appropriate contact point. I do recall that

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sometimes callers would get passed backwards and forwards between NBSC and HSH, particularly where a branch had losses and queried whether there was an issue with the Horizon System. I do recall that it was often difficult to get HSH to take ownership of calls where branches were experiencing losses as their main criteria for investigating a system issue for a branch was whether they had a receipts and payments mismatch when the branch balanced. From memory I do not recall any branches I dealt with having receipt and payment mismatch. In situations where callers were passed back and forth, the NBSC advisor would speak to their Team Leader who may in turn speak to their counterpart at HSH to try and get an agreement on who should have ownership of the call.

24. As a Tier 2 Service Support Advisor we had access to the KB and access to all counter operations manuals and Horizon user and balancing guides. However, we did not have access to any branch Horizon transactional information. This meant that when assisting branches with their balancing issues we were reliant on information given to us by the branch while on the telephone. In some situations where branches had experienced a loss, we would ask the branch to post or fax paperwork through to us. This paperwork included things like Cash Accounts, balance reports, cash and stock declaration and transaction logs.

#### Daily and Weekly Balancing Procedures

25. I have been asked by the Inquiry to describe the daily reporting and weekly balancing procedures that Sub Postmasters were expected to adhere to. The



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balancing process has changed quite drastically over the duration Horizon has been in branches and the explanation I give is based on how branches balanced when Horizon was first used in branches, and it was the same process in use in 2004.

26. In the early years of Horizon every receipt or payment transaction still had a counterfoil which was retained by the branch and required despatching either on a daily or weekly basis (the only exception to this was Automated Payment Transactions). As Horizon developed over the years things became more automated meaning there was less paperwork in branches to despatch but in 2004 it was still predominantly a very manual paper-based process.

27. Branches had a set of procedures they had to complete daily which involved the account and dispatch of various documentation. This included reports such as the daily cheque listing, Giro bank deposits and withdrawals, National Savings deposits and withdrawals, TV licences, Personal banking, and Automated Payment transactions. For each of these products the branch would produce a daily report, check the counterfoils, which they have kept in the counter till, agrees with the number and value on the report and then despatch in the relevant envelope. The actual procedure on Horizon would be to go into the counter daily report screen, select the report they wish to look at and then select print. Once the branch was satisfied that they had a counterfoil for each transaction they would select the cut off option on the Horizon screen. Cutting off the report just meant that it would reset to zero for the next day.

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28. The cheques listing report was a little more complicated. After checking the initial report and agreeing the physical cheques agree with what the report says the branch would have to do a remittance out to the value of cheques. Once the remittance out is completed the cheque list report is printed again, this time showing the remittance at the bottom, at this point the cheques listing report would be cut off.
29. The only other difference to the above is the Automated Payment report. This is printed and cut off in the same way as the other reports but there is nothing to despatch. Following an Automated Payment transaction (this was barcoded bills and magnetic payment cards) an officer copy receipt is printed, and it is this receipt which is reconciled against the report, and nothing is despatched. As transactions changed over the years more bill payments became automated to the point at today, we have very few if any actual bills where we retain the counterfoil.
30. Another daily procedure was the daily cash declaration. Each branch was required to complete an accurate daily cash declaration each day on the Horizon system as close to closing as possible. This was a mandatory process and enabled the Post Office Cash Management teams to track how much cash was in the network and request excess cash back.
31. The weekly balance procedure was a little more involved than the daily procedures. When undertaking the weekly balance, the first step would be to print, despatch and cut off all the daily reports as described. They would then follow a similar process for what are classed as weekly reports, these include

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Pension and Allowance docketts, Green Giro cheques, Postal Orders, Car Tax transactions, and redeemed saving stamps. There were other mandatory weekly reports that were produced such as suspense account report and rejected postage label report, these were kept in branch for reference.

32. Once all daily and weekly reports were printed and reconciled the branch would move onto the actual balance process. The next step would be to check the physical stock on hand (this check at this point did not include the other postage stamps) and check that what physical stock was on hand agreed with the figures on Horizon. This could be done several ways; the branch could produce a stock report or a balance snapshot and check the figures against one of those. They could also go directly into the adjust stock screen and scroll down on the screen checking the figures. Any differences found in either of these ways should be corrected by either adjusting their stock in the adjust stock screen or making a sale or completing a reversal against the stock item. Making the sale would reduce the system held stock figure (this is where the branch physically has less stock than Horizon shows) and completing a reversal would increase the system held stock figure (this is where the branch physically has more stock than Horizon shows). The last way a branch could check their stock against Horizon would be to make a stock declaration, the branch would type in the value of every stock item they have, and Horizon overwrites the existing stock figures with the newly declared stock figures. The declare stock option was rarely recommended for branches to do as it could often cause confusion and leave the branch struggling to balance.

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33. The next step in the balance process would be to make a stamp declaration for other stamps, this was postage stamps with a set value of 1p to £5 (this did not include first class and second-class stamps and stamp books). This is done by going into the declare stamps screen and entering the number of stamps for each denomination. The reason other stamps are treated differently than the rest of the stock items is because Horizon just gives one total value figure for all these stamps, this is to make the sales process easier when customers are sending mail items and many different denominations of stamps are affixed.
34. Following on from the stamp declaration the branch would declare the foreign currency on hand figure (this is only for branches who sold foreign currency). This consists of counting each type of currency on hand and declaring the value of that currency.
35. The final declaration to be made as part of the balance process was to declare the cash, this is done twice on balance day, once as part of the daily process making the daily cash declaration, and then once as part of the weekly balance process. When declaring the cash, the branch would enter the value of each denomination of note and coin. It was important that the balance cash declaration was the last thing to be done as making changes in any of the steps before this could alter the system derived cash figure and a new declaration would have to be made.

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36. Once the cash declaration is made the branch would make a variance check which would show any discrepancies (this is for shared stock units only, individual stock units would get a message after declaring the cash informing them of any discrepancies). The branch would then proceed to printing the trial balance report, it is at this point that the Horizon system commits any discrepancies, and the loss or gain would show at the top of the trial balance report. The branch would then roll the stock unit over into the next cash account period and a final balance report would be produced.

37. This same process was required to be carried out for each stock unit in the branch. Normally a branch would have a separate stock unit for their lottery and ATM cash. Once all stock units have been rolled over into the next cash account period the branch would then produce the cash account report which would produce a trial cash account and then the final report.

**Marine Drive Post Office and the litigation against Lee Castleton December 2003 to April 2004**

**NSBC initial involvement**

38. I have been asked by the Inquiry to explain my involvement with Mr Castleton of Marine Drive Post Office and the calls he made into NBSC between December 2003 and April 2004 relating to losses at his branch.

39. Prior to working at NBSC I had worked as HFSO. For this role I received two weeks training on the Horizon IT system, this training included the same training Sub Postmasters received along with additional training on the

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migration aspect of the role. From 1999 to 2001 I held the role of HFSO, over this period I gained a very good knowledge of Horizon including the balancing procedures.

40. When I joined NBSC 2001 I received one week training, this involved the Remedy case management system and telephone systems along with examples of calls that would come into NBSC and a background on the KB. My personal Knowledge of Horizon was excellent, and I kept my level of knowledge during my time at NBSC. Tier 2 advisors had training twice weekly and were kept up to date with Horizon and any changes. At Dearne House where NBSC Tier 2 was located there was a training room with a dozen or so Horizon training kits for advisors to use during training sessions.

41. I do not have any recollection of any interactions with myself and Mr Castleton or Marine Drive Post Office during my time at NBSC. I can see from documents provided by the Inquiry, specifically from a statement (Witness Statement of Andrew Wise (LCAS0000110)) I provided in the case against Mr Castleton in 2006 and an email from my then line manager Andrew Price (Witness Statement of Andrew Wise, Exhibit AW1 Page 30 (LCAS0000110)) that I helped a colleague, Ms Sarah Pennington.

42. Due to my Post Office experience and knowledge of the Horizon System it was not uncommon for colleagues to ask me questions if they were unsure themselves. Ms Pennington worked on Tier 2 as a Service Support Advisor in the same team as me within Service Support and we were both managed by Andrew Price. Ms Pennington asked me to look at Cash Accounts reports

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from Marine Drive Post Office Branch to see if I could help her identify the cause of losses that the branch had been experiencing. I believe it was Ms Pennington who was the Tier 2 advisor who was dealing with Mr Castleton at Marine Drive Post Office at the time she asked me to assist.

43. Other than the information I have read in the documentation from the Inquiry I do not recall any of the calls made to NBSC or the HSH helplines by Mr Castleton or Marine Drive Post Office and I am unable to recall any thoughts I might have had at that time on what attributed the loss while reviewing the Cash Accounts. I do not recall what documents I considered while looking at the losses at Marine Drive Post Office, but normal practice was to review the Cash Accounts, The Balance Reports and Transaction logs.

44. I know from the documentation provided by the Inquiry that my Team Leader, Mr Andrew Price, wrote an email to a Ms Cath Oglesby setting out the support NBSC had provided to Marine Drive Post Office (Witness Statement of Andrew Wise, Exhibit AW1 Page 30 (LCAS0000110)). Cath Oglesby was the Area Manager for Marine Drive Post Office; I am unaware of the circumstances of her contacting NBSC, and I do not recall any direct communication between myself and Cath Oglesby.

45. I do not personally recall any of the suggestions made in the email to Cath Oglesby from Andrew Price (Witness Statement of Andrew Wise, Exhibit AW1 Page 30 (LCAS0000110)) and I do not know whether those suggestions came from myself or not. In this email I can see that it was suggested that Mr Castleton works a manual system alongside the Horizon System. This was

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something that NBSC did suggest to branches as although transactions went through the Horizon System, they were still mainly manual based with a piece of paper or counterfoil for every transaction processed so it was relatively easy to run a manual system alongside Horizon. What this would do was either reassure the Postmaster that everything in Horizon was correct because they could check the manual figures against what Horizon said, or it could potentially identify any anomalies assisting HSH in pinpointing an issue. The second suggestion in this email was to take a snapshot before and after doing a remittance. This would satisfy the Postmaster that remittances were not doubling up as they could check the figures on both snapshots.

46. I do not recall whether at the time I thought the investigations set out in the email to Cath Oglesby (Witness Statement of Andrew Wise, Exhibit AW1 Page 30 (LCAS0000110)) were sufficient or not. From my memory of working in NBSC the investigations detailed were what I would have expected at that time given the scope of what a Tier 2 Service Support advisor at NBSC was able to do.

47. In the email from Andrew Price dated the 20/04/2004 (Witness Statement of Andrew Wise, Exhibit AW1 Page 30 (LCAS0000110)) he writes that 'Andrew Wise and myself both feel that the Horizon system is working properly and we are unable to help the PM further'. In my witness statement from 2006 (Witness Statement of Andrew Wise, (LCAS0000110)) I comment that I did not recall saying that and I still do not recall a conversation with Andrew Price where this was discussed. Generally, when NBSC looked at branch Cash Accounts to assist a Postmaster we were looking to see if any mistakes



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become apparent. NBSC would not have been able to identify if there were any issues caused by the Horizon system, this would have to be investigated by HSH. The only indication for NBSC to establish whether there was an issue with the Horizon system would be a Receipts and Payments mismatch when the branch tries to balance. From reviewing the documentation provided I cannot see any evidence of a receipts and payments mismatch occurring at Marine Drive Post Office, my assumption now would be the lack of a receipt and payment mismatch would be the basis of the comment in Andrew Prices email (Witness Statement of Andrew Wise, Exhibit AW1 Page 30 (LCAS0000110)).

48. In my statement from 2006 (Witness Statement of Andrew Wise (LCAS0000110)) I make the comment there is nothing more NBSC could do. I have no recollection of making that comment or what led me to that conclusion at the time. However, thinking back there was always a point where there were no more checks that could be done, this was usually once the Service Support advisor had exhausted all the checks and suggestions they could. At that point the resolution would be to move to next steps. Those steps could include escalating to the Suspense Account Team, advising the branch to contact HSH if the branch deem there is an issue with Horizon, advise the branch to escalate to the Area Manager for further support. NBSC was not set up as a dedicated investigation team specifically to help Postmasters identify the cause of losses, it was a general helpline which was there to support branches across a vast range of issues.

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**NBSC Call Logs and Post Office Limited v Lee Castleton**

49. I have been asked by the Inquiry to describe the circumstances in which I was asked to provide an overview of NBSC call logs from Marine Drive Post Office branch from December 2003 to April 2004 and the reason I provided a witness statement in the case against Mr Castleton. I can confirm that the case involving Mr Castleton was the first time I had been involved with proceedings against Sub Postmasters involving the Horizon IT System.

**Post Office Limited v Lee Castleton - Witness Statement**

50. In 2006 I was approached by Bond Pearce; POL's legal team solicitors, and I was asked to provide a statement in the civil case against Mr Castleton of the Marine Drive Post Office Branch. This was initially done via email and although I do not recall the specifics of who contacted me, I can see from the information provided by the inquiry that it was a Stephen Dilley of Bond Pearce solicitors (Email from Stephen Dilley (Bond Pearce LLP) to Andrew Wise Re: Post Office Limited -v- Mr L Castleton (POL00070822)). This was the first contact with Bond Pearce, I do remember that representatives from Bond Pearce attended my work location in Salford to discuss the statement and following that there were several emails back and forth tweaking my statement.

51. I can see from the information provided by the Inquiry that the initial email I received from Bond Pearce set out the assertions Mr Castleton made about the Horizon computer system (Email from Stephen Dilley - POL00070822), but I do not recall any further detail or conversations around them or Mr

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Castleton's defence and counterclaim. All conversations with Bond Pearce were around my evidence and witness statement and information on attending court. At no point during the proceedings in the case against Mr Castleton was I involved in any disclosure process; my role was simply as a witness.

52. I was specifically asked to provide a witness statement because Bond Pearce had identified that my name was mentioned in the email from Andrew Price to Cath Oglesby dated 20/04/2004 (Email from Stephen Dilley - POL00070822). The request to produce a statement was initially relating to my involvement with Mr Castleton and the call into NBSC, specifically my assistance to Ms Pennington. However, due to my knowledge of the workings of NBSC and my understanding of POL daily and weekly balancing procedures Bond Pearce provided me with a list of NBSC call logs and asked me to review and provide an overview (Email from Stephen Dilley (Bond Pearce LLP) to Andrew Wise Re: First draft witness statement of Andrew Wise (POL00113492)).

53. Part of the evidence provided in my witness statement was a training record for Mr Castleton. As at that point when I was asked to provide the witness statement, I worked in the Training Delivery Team, and I was able to access the training record and provide that as evidence. I did not personally have any involvement in the training of Mr Castleton.

54. I do remember that on the day I gave evidence in court I was sat waiting for the full day and I believe I was eventually called to give evidence at around

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16:00. I remember that I was kept updated throughout the day on what time they thought I would give evidence, but that time kept slipping back, I assumed it was POL lawyers who kept me informed. When giving evidence I found it strange that Mr Castleton was the person asking me questions, I believe it was explained to me that Mr Castleton was representing himself. There were several other witnesses waiting to give evidence, and I remember some were required to return on the next day, but I do not recall who they were. As I had never given evidence before or been involved in court proceedings it felt quite overwhelming. I cannot comment on how I thought proceeding went as I saw very little of what went on.

#### NSBC Call Logs

55. I do not recall personally dealing with any of the calls into NSBC from Mr Castleton or Marine Drive Post Office. However, I can see from the information provided by the inquiry that I dealt with a call on the 22/01/2004 which related to a loss of £4000 (NBSC call reference H12987919 – see Trial Bundle Index (LCAS0000365)). I can see from this information that I tried to assist in identifying the reason for the loss and I created a second call and assigned that to the suspense account team (NBSC call reference H12987957 – see Trial Bundle Index (LCAS0000365)). When reviewing these calls at this time I do not recall whether I had any concerns or not.

56. At NBSC on a Wednesday afternoon / evening and Thursday morning it was not unusual dealing with branches relating to balancing issues or discrepancies. Although I do not recall specific branches or details, I do know

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I dealt with numerous branches who had balancing issues or discrepancies although I do not know if they were to the same extent as Mr Castleton.

57. While reviewing the information in the NBSC call logs provided by the Inquiry, I can see a call on the 29/01/2004 with call reference H21274188 which refers to transactional archives (Trial Bundle Index (LCAS0000365)). I can see from the resolution field that the Tier 2 advisor states they have followed the KB instructions and emailed Adele Kilcoyne for this request. I did not deal with this call, and I do not know whether Archived Transactional data was provided to Mr Castleton.

58. I have been asked by the inquiry to look at several HSH call logs which they have provided (Call Logs referenced in LCAS0000110 and the following call Logs FUJ00146112, FUJ00146115, FUJ00146117, FUJ00146141, FUJ00146142, FUJ00146145, FUJ00146147, FUJ00146160, FUJ00146161, FUJ00146162, FUJ00146176, FUJ00146179, FUJ00146181, FUJ00146215, FUJ00146248, FUJ00146255, FUJ00146258, FUJ00146261, FUJ00146266, FUJ00146267). Although I am not familiar with the layout of these HSH logs, and I am not familiar with some of the technical terms and jargon it is clear that Mr Castleton made numerous attempts to request HSH look at his Horizon system as he was experiencing large and frequent losses.

59. As I mentioned earlier in this statement, broadly speaking the Service Support Team in NBSC was responsible for dealing with transaction and process related queries, this included the balancing process and supporting with

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losses. HSH was responsible for dealing with technical related issues. My memory of my time at NBSC was that it was always difficult to get HSH to investigate balancing type issues as they deemed these NBSC responsibility and unless there was a receipts and payment mismatch, they deemed it an NBSC issue.

60. It is clear from reading through the HSH call logs that the majority were deemed by HSH as NBSC issues, and the call was closed, even when it stated NBSC had exhausted their checks. In these scenarios where HSH repeatedly passed branches back to NBSC our only option was to escalate to one of the Tier 2 team leaders and they would contact their counterpart at HSH directly via telephone. I do not recall ever making these types of calls to HSH, or anyone at ICL Pathway or Fujitsu, and I may not be told to the content of the discussion, but my understanding was these were to take a decision on ownership and discuss action taken. I can see from reading the HSH call logs that as time progressed and more calls were made to HSH they did escalate further for investigation (Call Log E-0402251077 (FUJ00146176)) but reading the log it says there were no software problems found.

61. I have been asked by the Inquiry to consider call reference H13137225 and any relevance this call log might have (Trial Bundle Index (LCAS0000365)). This call was relating to the swap out of a base unit and the call description says it was an auditor asking the question. I can see from the call log and the classification in the activity field that this call was transferred to HSH which would be the appropriate course of action as NBSC would not have this information and could not answer Horizon equipment related calls. From the

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information in the call log, I am unable to determine whether this request had any relevance or not.

62. I have been asked by the Inquiry whether I consider that the support provided to Mr Castleton by the NSBC was adequate. As I have little to no recollection of dealing with Mr Castleton or assisting Ms Pennington or discussing with my manager, Andrew Price, I do not know what thoughts (if any) I had at the time regarding the support provided.

63. Having familiarised myself with the documents provided to me by the Inquiry (importantly the NBSC call logs and Fujitsu call logs) I can see that Mr Castleton (or a member of his staff) repeatedly reached out to both helplines requesting support regarding his balancing and the losses he was experiencing. This was probably on a more frequent level than you would expect from branches although this would not been known at the time of taking the call as the Service Support Advisor would not have full visibility of all the information.

64. I do think that NBSC did what they could given that they did not have access to any data apart from that provided by the branch. I do think there comes a point where there is nothing more that NBSC can check, they were certainly not able to check for technical issues such as bugs, that must be HSH, and we were reliant on HSH doing that. However, after reviewing the call logs I do think that Mr Castleton was left out on a limb and numerous calls were concluded by sending him to another team. This meant that Mr Castleton was

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bounced between NBSC and HSH, which looking back at that now I do not think that was helpful for Mr Castleton.

65. I have been asked by the Inquiry what did I consider to be the cause of the issues at Marine Drive Post Office. Although I do not recall dealing with Marine Drive Post Office or any specific thoughts, I do remember generally that I did not really form any conclusions of causes of losses when assisting branches as my job was to try and identify any errors in the balancing process or account.

#### **Other civil cases and criminal cases**

66. I have been asked by the Inquiry to describe my involvement in conducting investigations at the Post Office. In 2011 I moved into the role of Security Manager within the Security Team. Part of this role was to conduct investigations into Post Office branches where there was possible criminality. Before this role in 2011 I had not been involved in any other criminal or civil proceeding against Sub Postmasters except for my witness statement in the case against Mr Castleton in 2006.

67. The Security Manager role was part of the Security Operations Team. That team consisted of the Head of Security Operations who had three Security Team leaders report to them, each of the Security Team Leaders managed a team of around seven Security Managers. There was also a team of three Financial Investigators who also reported to the Head of Security Operations. The Head of Security Operations reported into the Head of Security.



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68. When I joined the Security Team in 2011 the Head of Security oversaw all aspects of Security for POL, and they had 4 heads of department reporting into them. The Head of Security Operations (this was the strand I worked in), The Head of Physical Security which looked after equipment and premises, the Head of Commercial (this later became financial crime) which looked after products and the financial crime aspect, and IT Security which looked after IT related issues. Although not long after working in the Security Team the IT Security aspect split from the wider Security Team and moved into a more IT centric function.
69. In around 2016 the remaining 3 strands within the Security Team split with Physical Security Team moving under the property function and the now Financial Crime Team moving to Legal and Compliance. The Security Operations Team moved the Network Function and then later became part of the Loss Prevention Team. Currently the Security Operations Team sits under the Chief Retail Officer's function.
70. The role of Security Manager had two aspects, the first being an investigator role who investigated Sub Postmasters, their staff, Directly Managed Branch Employees, supply Chain employees and anyone directly employed by POL who had committed possible criminal offences against POL. The second aspect of the role would be more a Physical Security Manager providing support post Robbery and Burglary type incidents and attacks against out Cash vans.

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71. In the Security Team we referred to an investigation as a case. A case would be raised and passed to the investigator by the Casework Team, this was a central admin team who managed the whole casework process. Although the case would be allocated by the Casework Team it was the Security Operations Team Leader who decided whether a case should be raised. It was also the Security Operations Team Leader who decided which investigator to allocate the case to, this was based on geography and current workload.

72. Cases could be raised for various reason including due to a loss being found at audit, analysis from teams who have identified potential criminality with specific products, concerns being raised by clients such as the DWP or DVLA, information received from Law Enforcement such as the Police.

73. The lead Investigator who was allocated the case would then undertake the investigation; this could include interviewing the suspect offender under PACE. The interview was a voluntary interview which would be done under caution and would be audio recorded. If an interview does take place the Lead Investigator would choose another investigator to be second officer, the second officer was there to support during the interview.

74. Once the investigation was concluded the lead investigator would submit the case to the criminal law team to apply the evidential test and decide on whether to prosecute or not. Often the Criminal Law Team would send advice asking the investigator to provide additional information or to clarify points they felt were missing.

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75. Before the split between Royal Mail and POL there was a Royal Mail Group Criminal Law Team, however, I do remember that Cartwright King was being used to make decisions on some prosecutions. After the split from Royal Mail POL retained one internal criminal lawyer (Jarnail Singh), however, it was Cartwright King who predominantly made the decisions on prosecutions.

76. If advice from the Criminal Law Team was to prosecute, then the DAM (I am not entirely sure, but I believe this stood for Designated Authority Manager) gave the final authority to proceed. The DAM was normally the Head of Security Operations or the Head of Security.

77. If the decision was to prosecute, then the investigator would arrange a date for the case to be heard at a local magistrate court (local to the suspected offender) and issue a summons via post. The Criminal Law Team would then be responsible for all legal proceedings in the courts.

78. The Conduct of Criminal Investigations Policy (POL00038642) sets out the full investigation process.

79. During my role in the security team, I was tasked by the head of Security Operations, Rob King, to assist him in pulling together a document detailing the investigation process. Rob King was new in the role and new to the business and given the split from Royal Mail in 2012 he wanted to produce a document detailing the process. This document became the conduct of investigation policy. This document did not change the way the security team conducted investigations; it solidified the process into one document. My role in producing this document was pulling information and processes from

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existing documents within the team and setting out chronologically. Rob King was responsible for all the narrative included in the document, I collated that with the process information.

80. In July 2013, at the time of the publication of the report by Second Sight, prosecutions were frozen immediately with only a handful of prosecutions after this date. Investigations and interviews continued, however when these investigations were submitted to Cartwright King (they were the Criminal Law Team who advised on prosecutions at that time) they did not provide any advice on prosecution, the cases were kept in a 'stack', sometimes for up to 12 months. Feedback coming down from the Head of Security Operations (Rob King), the Head of Security (John Scott) and Cartwright King was that POL was trying to obtain the services of a new Subject Matter Expert (SME) and once we had that in place prosecutions would resume.

81. In 2015 I moved into the newly formed Security Intelligence Team, so I was not directly involved in any more investigations. I do remember there were still investigations taking place but to a much lesser extent than previous years and at that point in 2015 there was still no SME in place. In 2015 Advice on prosecutions was made by General Council Jane McCloud (I am not sure at what point that decision was moved away from Cartwright King). I am not aware of any prosecutions against Postmasters or Branch staff being authorised by General Council, but I do believe there was one prosecution against an employee who worked in Head Office.

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82. I do believe that all investigation work undertaken by the Security Team stopped during the Group Litigation in 2018 / 2019. The Security Manager role is now purely a supportive role assisting branches with matters relating to physical security and Robbery / Burglary crime prevention and managing risk (from an external risk point of view) across the branch and supply chain network.

83. I have been asked by the inquiry for my recollection of 24 criminal cases. I can confirm that I have never been involved with 22 of the 24 criminal cases. The two criminal cases that I have been involved with are Grant Allen and Khayyam Ishaq.

84. For both cases involving Grant Allen and Khayyam Ishaq my involvement was that I attended the interview as second officer in the case. The role of second officer was to attend the interview with the lead investigator to assist them with the interview on the day. That assistance could include greeting the interviewee and their representatives, arranging the layout of the interview room, and providing support during the interview. The lead investigator would lead in the interview asking most of the questions; however, the second officer could interject with appropriate questions if required. Once the interview was concluded, as a second officer I would have had limited involvement in the case from that point. It would be the lead investigator who then progressed the case. From memory I do not recall any of the details of the case or interview with Grant Allen and Khayyam Ishaq.

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85. During my time working in the Security Team, I have been involved in a number of criminal cases and I have never had any concerns relating to these cases.

86. I have been asked by the inquiry my recollection of ten civil cases. I can confirm that I have never been involved with any of the 10 civil cases listed by the inquiry. Apart from the civil case against Mr Castleton I have not been involved in any other civil cases.

#### **Knowledge of bugs, errors and defects in the Horizon system**

87. I have been asked by the Inquiry whether I had, or was aware of, any concerns regarding the robustness of the Horizon IT system during my time working for the Post Office. To my knowledge in all my career working for the Post Office I have never witnessed a bug, error or defect while using the Horizon System and I have never had any concerns. When I joined the Post Office Security Team in 2011, I became aware that a group of Sub Postmasters were claiming that Horizon was responsible for the losses they had suffered in branch. However, the message from the business was always that there were no issues with Horizon and even during the start of the group litigation the theme from the business was that POL would be successful in proving there was no issue with the system.

#### **Other matters**

88. I have been asked if there are any other matters that I wish to bring before the inquiry. Since 2020 the Security Intelligence Team has worked with the Post

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Office solicitors Peters and Peters, the purpose of this was to provide historic data to them relating to investigations and prosecutions undertaken by the Post Office Security Team. Due to my extensive knowledge and experience of working for Post Office these interactions with Peters and Peters developed into providing information on Post Office and Horizon procedures.

89. Some of the questions I have been asked are linked to cases that are going through the CCRC process. My involvement is to provide general advice on how a particular transaction would be processed on Horizon or how the accounting and despatch for a transaction would work. For example, I provided an explanation on how the Green Giro transaction was processed on the Horizon system and when and where the actual Giro Cheques were despatched to. I also assist Peters and Peters to help them understand what historic forms were used for, or to explain to them what a particular acronym or other Post Office Jargon means. The requests I received from Peters and Peters sometimes come via email and sometime via telephone call.

**Statement of Truth**

I believe the content of this statement to be true.

Signed:

**GRO**

Dated: 31<sup>st</sup> May 2023

**Index to the First Witness Statement of Andrew Wise**

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2	POL00070822	(Email from Stephen Dilley (Bond Pearce LLP) to Andrew Wise Re: Post Office Limited -v- Mr L Castleton ()).	POL-0067385
3	POL00113492	Email from Stephen Dilley (Bond Pearce LLP) to Andrew Wise Re: First draft witness statement of Andrew Wise	POL-0112643
4	POL00038642	The Conduct of Criminal Investigations Policy	POL-0027953
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