1   **Tuesday, 26 September 2023**
2   (10.00 am)
3   **Statement by MR BEER re Disclosure**
4   **MR BEER:**   Sir, good morning, can you see and hear
5   me?
6   **SIR WYN WILLIAMS:**   Yes, I can, thank you.
7   **MR BEER:**   Sir, before we start Mrs Chambers'
8   evidence this morning, there's just a short
9   statement I would like to read, if I may, about
10   some recent disclosure.
11   **SIR WYN WILLIAMS:**   Yes, of course.
12   **MR BEER:**   Sir, you will recall that on Tuesday of
13   last week I provided an update to the Inquiry on
14   the Post Office's late disclosure to the
15   Inquiry. I noted that, since 3 July 2023, so
16   just before the first disclosure hearing, the
17   Post Office had disclosed some 23,000
18   potentially relevant documents to the Inquiry of
19   which some 15,200 are said by the Post Office to
20   relate to Phase 4 of the Inquiry. I noted that
21   this meant that a high number of potentially
22   relevant documents had been disclosed in the
23   recent past by the Post Office and many of them
24   were presently being processed by the Inquiry.
25   I also said that nobody should be surprised

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1   if witnesses had to be recalled as a consequence
2   of this and other disclosure issues.
3   On Friday afternoon and yesterday at midday
4   the Inquiry received further updates from the
5   Post Office regarding its disclosure. The
6   update related to an issue that had been
7   highlighted by the Post Office to the Inquiry
8   previously, known as the back-up tapes. It
9   relates to 37 back-up tapes that the Post Office
10   located at one of its sites. The Post Office
11   had provided an update on the back-up tapes on
12   22 August 2023 in a letter to the Inquiry,
13   disclosed to the Core Participants prior to the
14   5 September disclosure hearing.
15   Just for your reference, no need for it to
16   be displayed, the document reference for that
17   letter is POL00124517.
18   That update had noted that the Post Office
19   had identified some 42 back-up tapes with
20   unknown contents at a site and that the Post
21   Office had, for some time, notified the Inquiry
22   of the steps that it was taking to understand
23   the contents of the back-up tapes, which the
24   Post Office said were substantial in volume,
25   including in particular whether the back-up

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1   tapes might relate to matters being investigated
2   by the Inquiry. The number of the back-up tapes
3   was later changed in correspondence to B37.
4   However, the Post Office noted at that time
5   that, as the back-up tapes:
6   "... ordinarily reflect a copy of the data
7   that exists elsewhere, they are not ordinarily
8   considered as key repositories to process and
9   search for the purposes of disclosure."
10   The Post Office also noted that:
11   "The files recovered from the dataset
12   sessions on the tapes may be partially or
13   significantly duplicative of files already
14   harvested, searched and disclosed to the
15   Inquiry."
16   The Post Office provided a detailed
17   description of the steps that it was taking
18   before it begin to investigate the back-up tapes
19   in that 22 August 2023 letter. This update was
20   detailed and largely of a technical nature.
21   On 31 August 2023 the Post Office provided
22   further back-up tapes, this was also provided to
23   the Core Participants before the 5 September
24   disclosure hearing. That's POL00126338, no need
25   to display.

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1   The Post Office noted that it had started
2   its investigation into the tapes and was taking:
3   "... a two-pronged approach, firstly, using
4   technical policy-based and other means to
5   identify whether the back-up tapes contained
6   meaningful new information and, secondly,
7   concurrently taking steps to allow the Post
8   Office to review the actual data on the tapes to
9   identify whether the tapes contain new
10   information."
11   At that time, the Post Office noted that it
12   was not yet able to confirm how long certain
13   steps would take but that it would continue to
14   keep the Inquiry informed and would welcome our
15   thoughts on an appropriate approach to adopt.
16   Last Friday afternoon at 3.08 pm, the Post
17   Office sent a further update to the Inquiry,
18   regarding the 37 back-up tapes. That back-up
19   tapes update highlighted three key points.
20   Firstly, an initial analysis of the tapes as
21   performed by KPMG suggested that the content of
22   the tapes are largely non-duplicative. In other
23   words, while the tapes are called back-up tapes,
24   they contain new material. They're made up of
25   documents that are not already in the Post

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1 Office's Relativity platform from which it
2 reviews documents for potential disclosure to
3 the Inquiry.
4 Secondly, after performing initial searches,
5 it seemed that a significant number of the
6 back-up tape documents may be relevant to the
7 Inquiry's terms of reference, including Phase 4.
8 Third, the date range of the parent emails
9 on the back-up tapes was primarily 2001 to 2008.
10 The Post Office noted that this was a period
11 where their electronic disclosure was more
12 limited and the Post Office had therefore relied
13 more heavily on their hard copy materials. In
14 this sense, the Post Office has, it said,
15 "a present working assumption", that this
16 material may be unique at least in the main.
17 The Post Office noted that it was intending
18 to prioritise the review of this material on
19 a witness-by-witness basis and, with this in
20 mind, the Post Office was prioritising the
21 documents responsive to search terms for Anne
22 Chambers and Mandy Talbot. It noted that it had
23 run some searches over the documents for "Anne
24 Chambers" and "Mandy Talbot", both in speech
25 marks, and this had generated some 208 and 1,060

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1 hits respectively, excluding families.
2 The Post Office noted that they would
3 provide relevant documents relating to
4 Mrs Chambers as soon as possible and envisage
5 doing so informally by end of day on Friday.
6 Sir, the Inquiry legal team considered this
7 information urgently on Friday afternoon. In
8 order to get a better understanding of the
9 issue, the legal team asked the Post Office to
10 indeed provide the documents responsive to the
11 search terms for Anne Chambers as soon as
12 possible and also asked the Post Office to
13 provide search hit results for the Phase 4
14 witnesses who are to be called between today and
15 Friday, 20 October 2023: namely John Jones,
16 Simon Recaldin, Catherine Oglesby Andrew
17 Hayward, John Scott, Rob Wilson, Paul Inwood,
18 Thomas Pegler, John Breeden, Alan Lusher, Alison
19 Bolsover and Marie Cockett.
20 The Inquiry asked for two sets of results,
21 one with family members and one without, no
22 later than 11.00 am yesterday. At 7.03 pm on
23 Friday evening the Post Office provided
24 documents that had been responsive to Rule 9
25 requests or otherwise said to be of interest

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1 from the "Anne Chambers" search hits of 208
2 documents. They provided 84 documents in total.
3 In the meantime and over the weekend, the
4 Inquiry Team urgently considered the 84 new Anne
5 Chambers documents. The Inquiry is of the view
6 that none of the material is sufficiently
7 relevant to Phase 4 issues, however that
8 disclosure did contain new material that may be
9 relevant to Mrs Chambers' evidence in relation
10 to Phase 3, in particular in relation to
11 knowledge of and action taken in response to
12 bugs, errors or defects.
13 At 12.14 yesterday, the Post Office provided
14 the search hit results for the remaining four
15 Phase 4 witnesses to be called between
16 29 September and 20 October. This included
17 expanded search terms beyond just "first name"
18 and "last name" in inverted commas.
19 Sir, as you would expect, the search results
20 from the back-up tapes vary from witness to
21 witness. One had no hits, some have hits in the
22 hundreds and some have hits in the tens of
23 thousands. Indeed, one witness has some 93,699
24 hits when you include family members in
25 a broader search.

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1 Last week, I noted that, as had been made
2 clear on previous occasions, when the Inquiry
3 has addressed the issue of late disclosure, all
4 of those interested in the work of the Inquiry,
5 including but not limited to witnesses and Core
6 Participants, should understand that the fact
7 that the Inquiry has decided to continue to hear
8 evidence does not mean that witnesses from whom
9 evidence is about to be taken will be giving
10 evidence just once.
11 I also noted that the Inquiry will not
12 hesitate to request further witness statement or
13 witness statements from witnesses and call
14 witnesses back to give evidence, in the event
15 that sufficiently relevant material is either
16 disclosed before the witness gives evidence but
17 the Inquiry hasn't had the opportunity to
18 process it or such evidence is disclosed after
19 a witness has given evidence.
20 This not only to ensure that all
21 sufficiently relevant material is put to
22 witnesses but also in fairness to witnesses, so
23 they have the opportunity to address all
24 sufficiently relevant material.
25 On behalf of the Inquiry, I repeat those

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comments now. Like other late disclosures, once the Inquiry has had a reasonable opportunity to analyse the material that the Post Office has provided from the back-up tapes, the Inquiry will disclose that material to Core Participants and witnesses as required.

If this necessitates the need for supplemental requests, then those supplemental requests will be sent.

Having spoken with you, sir, I make the following additional comments: on 15 September you published a statement following the 5 September directions hearing. You stated that there was a need for close monitoring of the disclosure process during the remainder of the Inquiry, especially as it relates to disclosure from the Post Office. You also directed that the Inquiry would hold a further hearing to consider disclosure issues, on a date to be fixed in the period commencing 8 January and ending 19 January 2024.

Sir, your legal team consider that the material that is disclosed as a result of the back-up tapes ought to be closely monitored, alongside other issues in the lead-up to the

further disclosure hearing and, if witness evidence is required on the back-up tapes, both in relation to specific documents that come to light results of that disclosure or on Post Office's updates in relation to the back-up tapes more generally, then it will be sought in accordance with your directions.

Sir, that's all I would propose to say on the issue of disclosure now.

Sir, I think you're still muted.

SIR WYN WILLIAMS: I said thank you, Mr Beer, and I was would just like to add that, as I hope has been clear from Mr Beer's statement, he has been consulting me throughout the period since Friday afternoon about how we should approach what he has described in relation to the Post Office disclosure.

I wish to make it clear that I did consider whether it was appropriate to stop the process of evidence gathering. Having reflected upon that, I decided it wasn't, because I am satisfied, at least at the moment, that we can deal with the evidence of Mrs Chambers and those who follow her immediately and also hopefully deal with the appropriate disclosure to Core

Participants on necessary documents which have been recently disclosed to us. But, as Mr Beer has stressed, I am keeping all of this under very close review and, if it is necessary to change the approach that I have determined is appropriate, at least for Mrs Chambers' evidence, I won't hesitate to change my approach.

So that's all I wanted to say about that. Thank you, Mr Beer.

MR BEER: Thank you, sir. May Mrs Chambers be sworn.

SIR WYN WILLIAMS: Well, does she need to be? That was the question I was going to -- she was sworn on the last occasion. I'm very happy for her to be resworn, but is it strictly necessary?

MR BEER: Sir, I reflected on that and I read it the ending of the transcript of the last session and you released Mrs Chambers because there would have been a need for her to speak to her legal representatives and I took that to be a release from the oath, essentially.

SIR WYN WILLIAMS: All right, well, I think Mrs Chambers, unless you have any objection to the course of action proposed by Mr Beer, it's

probably sensible that you be resworn. I'm not going to repeat it but the statement I made to you at the beginning of your evidence back in May, about self-incrimination, applies equally to the evidence you're about to give, all right?

ANNE OLIVIA CHAMBERS (re-affirmed)
Questioned by MR BEER

MR BEER: Thank you, Mrs Chambers. As you know, I ask questions on behalf of the Inquiry. You gave evidence on 2 and 3 May 2023, on all of the first day and for some of the second day, about the operation of the SSC, about other service support offered by Fujitsu to the Post Office, about the operation of PinICLs, PEAKs and KELs, about problem management between Fujitsu and the Post Office, and then, for the balance of the second day, about some bugs, errors or defects in the Horizon System.

I said that I would continue to examine some other bugs, errors or defects when you came back to give your Phase 4 evidence. I shall do that probably tomorrow and I should say I'm not going to look at bugs 19 and 23 when we get to them. They, as it seems to me, are adequately addressed in Mr Justice Fraser's judgment and in

1   other documents that the Inquiry now has. So
2   you're principally here to give evidence about
3   the work that you undertook in Mr Castleton's
4   case.
5 **A.** Yes.
6 **Q.** Before I get to either the additional bugs or
7   Mr Castleton's case, I'd just like to pick up on
8   four topics that we addressed on the last
9   occasion where we've now got some additional
10   disclosure that I would like to ask you about.
11   Firstly, ARQs and the SSC.
12 **A.** Okay.
13 **Q.** At the end of the last evidence session, this is
14   on 3 May 2023, Mr Moloney asked you about a work
15   instruction that you had been asked to write by
16   the SSC management team in August 2011.
17 **A.** Yes.
18 **Q.** There's no need to display the document at the
19   moment but if you want to refresh your memory we
20   can go back to it. The document is FUJ00138385.
21   It was suggested to you that a reason that
22   the management team may have asked for all
23   issues concerning litigation to be forwarded to
24   the SSC management team for sign-off might be
25   a financial reason.

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1 **A.** Yes.
2 **Q.** Yes, that motive or purpose was suggested to you
3   and you said, in summary -- and I do
4   summarise -- well, that would really be an issue
5   for your managers to answer what their
6   motivation or purpose was?
7 **A.** Yes.
8 **Q.** Can we look at a document to see whether this
9   sheds light on the issue, please. It's
10   FUJ00154665. Can you see that this is an email
11   thread dated 8 August 2007?
12 **A.** Yes.
13 **Q.** It's copied to you, you'll see you're last of
14   the copy-ees?
15 **A.** Yeah.
16 **Q.** But it's a message to Penny Thomas and Peter
17   Sewell --
18 **A.** Yes.
19 **Q.** -- from Mik Peach, your then line manager, yes?
20 **A.** Yes, that's right.
21 **Q.** If we just read the message, Mr Peach says:
22   "Penny,
23   "I am not saying that you are confused about
24   the difference between an *ad hoc* request, an ARQ
25   and a support call -- I am saying that the

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1   customer is either confused about the
2   difference, or else is making a deliberate
3   attempt to avoid the cost of raising ARQs or
4   *ad hoc* data requests by raising these as support
5   calls.
6   "Bottom lines for SSC on these problems is
7   as follows:
8   "(a) If it is believed there is a system
9   problem which has caused discrepancies, then we
10   will investigate as normal ... this includes the
11   calls passed over yesterday although none of
12   these calls says that they believe there is
13   an FS problem, all of them actually indicate
14   there is a mismatch in the figures in POLFS,
15   cause unknown.
16   "(b) If it is believed that POL are using
17   the support process as a means of avoiding ARQ
18   or *ad hoc* data request costs then the calls
19   should be referred back to POL (by Liz?)
20   requesting payment.
21   "(c) If there is any hint of litigation,
22   then we won't deal with the calls as support
23   calls, but will assist the security team in
24   their analysis.
25   "There is a significant difference in the

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1   system now which is leading to this sort of
2   call, and why there needs to be a more robust
3   application of the process -- in the past,
4   reconciliation on the system was done in two
5   different streams within the FS domain -- if
6   there was a reconciliation issue, or mismatch in
7   the figures then it had to be in our domain
8   somewhere (even if it was chord by [postmaster]
9   user error).
10   "The new system means that much of the
11   reconciliation and auditing figures are produced
12   by POLFS, which is not in the FS domain, is
13   a POL system and is managed for them by PRISM.
14   "Regards
15   "Mik."
16   You'll see that, in the course of that
17   message, Mr Peach says expressly -- he expressly
18   states that a concern is that the Post Office is
19   using referrals to the SSC for investigations to
20   bypass requests for ARQ data that are
21   chargeable; can you see that?
22 **A.** Yes.
23 **Q.** Now, although this was before the preparation of
24   the work instruction that you were taken to,
25   does it assist you with your memory as to what

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1 the reasons for or the motives were for asking
2 for the work instruction?
3 A. That was the management's line, if you like, and
4   had obviously been so for some time. SSC were
5   primarily there to investigate problems as they
6   happened. If you get to the point that it's
7   months down the line and the evidence is needed,
8   then it was certainly harder for us to
9   investigate because we would need to effectively
10   get the data out of audit anyway and, possibly,
11   this was then seen as, if it's at that point in
12   the process, then should Post Office have been
13   paying for it?
14   But I still think this is a question for my
15   management, who were the ones saying this,
16   rather than for me.
17 Q. I understand. You see in the first paragraph
18   Mr Peach raises the suggestion that the client,
19   POL, may be making a deliberate attempt to avoid
20   the cost of raising ARQs, essentially by getting
21   the SSC to do the work, and then in (b) says:
22   "If it is believed that POL are using the
23   support process as a means of avoiding ARQ or
24   *ad hoc* data request costs ..."
25   Can you recall whether this was a theme in
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1   your time that was spoken about within the SSC?
2 A. I think it was seen that this was an additional
3   service that Post Office were expected to pay
4   for, if they needed this data, and that was part
5   of -- I assume, was part of the contract between
6   the two companies but I don't know that.
7 Q. Although you may be right that the motivation
8   for the request for the work instruction is
9   a matter for your managers, either Mr Peach or
10   Mr Parker, I'm asking you: can you recall
11   discussion within the SSC about the facility
12   being abused, essentially, by the client, in
13   order to avoid the costs of ARQ data?
14 A. It wasn't something we sat there talking about
15   every day. It's more likely that there were
16   times, perhaps, when I was being helpful and
17   perhaps doing more things than I should have
18   been, that should have been charged for.
19 Q. The paragraph, two from the bottom, beginning
20   "There is a significant difference"; can you see
21   that?
22 A. Yes.
23 Q. Can you read that to yourself or reread it to
24   yourself and assist us, if you're able, with
25   what it means.
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1 A. I think this is talking about the back-end
2   systems, which I cannot remember all the details
3   of, but there was a big change at some point,
4   and Post Office's back-end database was now
5   something called POLFS, which was not, as it
6   says, part of the Fujitsu domain but was managed
7   by a third party.
8   And so before, when -- even though it wasn't
9   necessarily a front-end of Horizon problem,
10   because investigation would have to be done by
11   Fujitsu, then we would have done that, and Mik
12   is now pointing out that now, you know, you've
13   got two parties resolved so Fujitsu, perhaps,
14   should not be taking on more than their fair
15   share of it.
16 Q. So if an enquiry is raised or an issue is raised
17   by a subpostmaster with the NBSC and work is
18   done, for example, by an investigator to either
19   rule in or rule out a problem on the counter, is
20   this paragraph suggesting that the SSC should
21   take the position that there ought to be further
22   work done behind the scenes at the Post Office
23   to consider any discrepancy or shortfall before
24   the SSC would do any investigatory work?
25 A. No. This is talking about the reconciliation
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1   between the back-end systems, not the counter
2   reconciliation. But there were cases then when
3   Post Office would be looking at the data that
4   was held in POLFS for a branch and there might
5   be some inconsistency with branch figures,
6   whereas they -- that had been fed through from
7   Horizon.
8   This would not necessarily -- well, it --
9   I can't remember specific examples but this is
10   not the postmaster at the end of the week or the
11   month saying "I've made a discrepancy"; it's
12   more possibly the two different systems having
13   different numbers and Post Office trying to work
14   out why that might be the case.
15 Q. So Mr Peach isn't saying that the SSC won't do
16   the work: he's just saying that SSC won't do the
17   work for free; is that right?
18 A. He's saying that, in these situations where
19   there's some inconsistency between -- it may be
20   if there's an inconsistency between POLFS
21   something at an individual branch -- I'm not
22   saying -- not sure that he's saying that we
23   didn't -- wouldn't look at that but this is less
24   about individual branch things. I don't think
25   I'm going to be able to get much further with
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1   this, sorry.
2 Q. Well, looking at the email as a whole, is
3   Mr Peach saying that the SSC will only
4   investigate once data has been requested by the
5   Post Office through the Security team and the
6   Security team has asked for assistance from the
7   SSC?
8 A. It would depend entirely on what the problem was
9   that we were being asked to investigate.
10   Obviously, you know, day-to-day 'happening now'
11   problems, they would come into SSC and that
12   would be our normal investigation.
13   This is things where it is Post Office,
14   probably not NBSC, but the people looking after
15   POLFS and the Post Office financial systems at
16   the back end, or potentially investigating
17   individual branches for litigation, or whatever,
18   those requests would come in through the
19   Security team and I believe it's just sort of
20   pointing out to Penny that she mustn't then just
21   pass them on to SSC as support calls but they
22   needed to be considered as to whether they
23   fitted better into the *ad hoc* request or the ARQ
24   process.
25 Q. The paragraph at (c), "If there is any hint of
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1   litigation, then we won't deal with the calls as
2   support calls but will assist the Security team
3   in their analysis"; can you remember whether
4   that was fleshed out at all, what "any hint of
5   litigation" might be? Whether it was the
6   postmaster alleging faults with Horizon, if
7   there were unexplained shortfalls, if there were
8   investigators or auditors involved? What was
9   the trigger for saying, "No, we won't deal with
10   this, this needs to be routed through a Security
11   team"?
12 A. That was a decision for Penny to make, what she
13   was hearing from the people raising the calls
14   within Post Office.
15 Q. So she was the gatekeeper, was she?
16 A. For the type of queries and calls that are being
17   talked about here, it is talking about calls
18   that are coming in through the Security team.
19 Q. What I'm trying to work out is how it worked on
20   the ground, in the light of this email after
21   2007. If a PEAK is raised with the SSC, how it
22   was established whether this was a genuine
23   support call or whether it was something which
24   disclosed a hint of litigation and had to go
25   down a different route?
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1 A. Yes, I think -- this is talking about the calls
2   that were coming in through the Security team,
3   not the calls that were coming in through the
4   Helpdesk?
5 Q. So the whole email you read as being only about
6   calls coming in through the Security team?
7 A. Yes, yes. That's what it's addressing.
8 Q. Where do you see that?
9 A. Because it's sent to Penny Thomas and is
10   obviously part of a discussion with her and
11   it's -- the top two people on the distribution
12   list are the Security team, and that's who it's
13   sent to, and then it's copied to Service
14   Managers and just a couple of us within SSC who
15   possibly had been dealing with calls that had
16   come in through Penny, and so Mik wanted to make
17   us aware of what he was saying. I really can't
18   remember.
19 Q. Can you recall any instruction or advice that,
20   where there was believed to be a risk of
21   litigation, which, for the most part, meant
22   criminal prosecutions, the Post Office and
23   Fujitsu should work especially closely together,
24   rather than bouncing the issue back to the
25   Security team and saying "Either you pay for
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1   an ARQ set of data before we do any further
2   investigation work"?
3 A. I think we were expecting, as I say, Penny to
4   talk to her Post Office contacts and find that
5   before taking it over. I mean -- yeah, sorry,
6   I don't think I can answer your ...
7 Q. Yes. Would you agree that, in cases that may be
8   heading towards a criminal prosecution, it was
9   necessary for the Post Office and the SSC to
10   work particularly closely together to ensure
11   that the right data was analysed and, if
12   necessary, harvested and retained?
13 A. I think this was -- that was the responsibility
14   of the Security team, not the responsibility of
15   SSC at that point. If there was examination of
16   that data then needed in the run-up to a case,
17   then I believe the Security team would normally
18   talk to Gareth Jenkins, or somebody like that,
19   to do the analysis and it's possible that
20   somebody like me might then have been roped in
21   to assist. I think, certainly from 2007, you
22   could say, yes, that's what would happen.
23   But if a call had come in through the NBSC
24   from a postmaster saying "I'm making losses and
25   I think it's the system at fault", then, if this
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1   was a current ongoing situation, then, yes, that
2   would certainly be looked at by SSC in the first
3   instance. The fact that it might at some point
4   later end up as litigation wouldn't stop us from
5   looking at it at that very early stage.
6 Q. Lastly on this document, at the end of (c) "but
7   will assist the Security team in their
8   analysis". Was there any developed, written
9   protocol that set out the steps that would be
10   taken by the SSC in assisting the Security team
11   in their analysis of data where there was a hint
12   of litigation?
13 A. I have no recollection of anything written about
14   that.
15 Q. Was there, short of anything written, any
16   clearly articulated set of requirements on what
17   needed to be analysed, what data needed to be
18   harvested --
19 A. No, because --
20 Q. -- and what needed to be retained? It was done
21   on a case-by-case basis; is that right?
22 A. The data would have been the ARQ data and SSC
23   had no access to the servers on which that was
24   stored.
25 Q. Thank you.

<center>25</center>

1   That was the first topic. The second topic,
2   if I may turn to it, Horizon data integrity.
3   Could we look, please, at FUJ00155493. If we
4   just look here, we can see your email at the top
5   of the page to Mr Jenkins.
6 A. Yes.
7 Q. Then if we scroll down, please, we can see
8   Mr Jenkins' email to you and others at the foot
9   of the page. If we just go over the page, we
10   can see he signs it off. So, if we start at the
11   foot of page 1, please, and see what Mr Jenkins
12   said. "All", and you can see this is addressed
13   to Allan Hodgkinson, Jeremy Worrell, you, Jim
14   Sweeting, Chris Bailey, copied to Latoya Smith
15   and John Burton.
16 A. Yes.
17 Q. He says "Jeremy has asked"; is that Jeremy
18   Worrell in the distribution list?
19 A. I presume so but I don't really have any memory
20   of him.
21 Q. Were there other, relevant Jeremys in the SSC
22   or --
23 A. Certainly nobody -- that wasn't somebody in SSC.
24 Q. No.
25   "Jeremy has asked me to produce a paper on

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1   Horizon Data Integrity to support [the Post
2   Office] in refuting claims by postmasters that
3   Horizon is causing money to be lost.
4   "I've put together an initial draft. I've
5   ignored the 'front bits' for now and am
6   currently looking for comments on the technical
7   aspects and in particular the comments in
8   yellow."
9   Then there's a character string indicating
10   that there was an attachment, I think.
11 A. Yes.
12 Q. "Also if anyone is aware of other material to
13   feed in on this, I would be grateful. I had
14   a quick look through PVCS ... "
15   Can you recall what PVCS was?
16 A. That was the document storage system.
17 Q. "... and a search through the TED ..."
18   Can you recall what the TED was?
19 A. No.
20 Q. "... and found nothing useful there.
21   "Note that this is NOT yet in a state to go
22   to [the Post Office] and once I've had feedback
23   from all of you (and anyone else you think is
24   relevant), Jeremy needs to pass this through
25   Commercial."

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1   What was Commercial?
2 A. I presume the -- a department in Fujitsu.
3 Q. Reading on:
4   "We have a [conference] call with [the Post
5   Office] at 4 pm on Friday, so I'd appreciate any
6   feedback by lunchtime Friday ..."
7   Then a comment addressed to Jeremy, just
8   scrolling down:
9   "Do you have any thoughts as to where this
10   should be lodged in Dimensions. I assume we
11   need to make this a formal document, but if not,
12   I'm happy to remove the 'front bits'."
13   Then it's signed off "Regards, Gareth".
14   Just going back to the distribution list,
15   peace. Can you help us with the other people
16   there: Allan Hodgkinson, do you recall him and
17   what position he had?
18 A. He was one of the senior designers. I can't
19   remember.
20 Q. In the development team?
21 A. Development or architects, yes.
22 Q. Okay. You've said that you don't recall Jeremy
23   Worrell?
24 A. No.
25 Q. Jim Sweeting?

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1   A.   I don't remember that name.
2   Q.   Chris Bailey?
3   A.   He was another of the very senior
4   architects/designers.
5   Q.   Latoya Smith?
6   A.   I don't remember.
7   Q.   John Burton?
8   A.   I think he was the manager of a group of
9   development teams.
10 Q.   So he's giving you a paper, Mr Jenkins, and is
11   asking you, on his initial draft, for views.
12   You'll see in the first paragraph he says:
13   "Jeremy has asked me to produce a paper on
14   Horizon Data Integrity to support [the Post
15   Office] in refuting claims by postmasters that
16   Horizon is causing money to be lost."
17 A.   Yes.
18 Q.   Would you have understood this literally: the
19   purpose of the paper was to be to support the
20   Post Office in refuting claims, rather than to
21   explore whether there may be anything in the
22   claims being made by subpostmasters?
23 A.   Gareth wrote that sentence and not me.
24 Q.   Yes, but you're a recipient of it. Would you
25   understand that the direction was to produce
                              29

1   a paper that would support the Post Office in
2   refuting claims rather than the more open
3   question of an exploration of whether there was
4   anything in the claims made by the
5   subpostmasters?
6   A.   Yes, well, that's what he says he is doing.
7   Q.   Yes, and how would you -- say for example you
8   thought "Well, I have got some knowledge about
9   the way that Horizon is structured and, by this
10   time, 2009, by the way in which bugs, errors or
11   defects have manifested themselves and how we in
12   SSC and the company more broadly has treated
13   them, I've got some evidence that may assist
14   claims by subpostmasters" --
15 A.   I --
16 Q.   -- would you have --
17 A.   I didn't --
18 Q.   -- included that in reply?
19 A.   I was not aware of any bugs, errors and defects
20   that were causing money to be lost without them
21   leaving any sign that a problem had occurred.
22   In general, although, yes, of course there were
23   bugs, errors and defects, they were not causing
24   continual ongoing losses.
25 Q.   You have introduced a qualifier there
                              30

1   Mrs Chambers, "I was not aware of bugs, errors
2   and defects that did not leave a sign that they
3   were occurring", essentially?
4   A.   Mm, yeah. There obviously were bugs, errors and
5   defects that, in some cases, were causing money
6   to be lost but my view at that time was that
7   Horizon was robust in general. There would have
8   been specific cases when it was not.
9   Q.   Would you --
10 A.   The --
11 Q.   I'm sorry?
12 A.   No, it's all right.
13 Q.   Do you agree that this is suggestive of
14   a request to put forward the best case in
15   refuting the claims made by subpostmasters,
16   making the best case for Horizon's integrity?
17 A.   That would appear to be how Gareth has put it
18   there. I mean, my view was that, you know,
19   I would investigate each case individually,
20   which was my job, you know, when the support
21   calls came in, and that -- yeah. I mean, that's
22   how Gareth has put it there and I was not aware
23   of problems with data integrity that were
24   causing losses left right and centre, leaving no
25   indication behind them.
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1   Q.   I don't believe that we have the family
2   documents for this email, so I can't presently
3   show you the draft of the Horizon Data Integrity
4   report that's referred to there in that
5   character string, ie the document that you were
6   being asked to comment on.
7   A.   Yeah.
8   Q.   We do have a version of the document dated
9   2 October 2009, the day after your email and,
10   when we look at it, we'll see that it appears to
11   include or reflect the comments that you made in
12   part.
13 A.   Yeah.
14 Q.   Can we scroll up to your reply, please:
15   "Section 2
16   "You mention incremental consequence numbers
17   in the audit section at the end, but could
18   mention it earlier too, to make clear that each
19   message has a unique identifier which stays with
20   it when it is replicated.
21   "Each individual message has a checksum.
22   "What quite sure what you should be saying
23   about CRC read failures. We aren't currently
24   checking old event logs for these when doing
25   audit retrievals, and I don't want us landed
                              32

1 with even more checks to make. If there are CRC
2 errors, SMC normally raise a call and we trash
3 the message store and let it rebuild -- but
4 probably don't want to say that! But if we
5 don't say, [I think that's meant to read 'will']
6 they ask?"
7   Is that right?
8 **A.** Yes.
9 **Q.** "[will] they ask?
10   "Event logs -- more than 18 months but not
11 sure if it is 7 years."
12   Then:
13   "[Paragraph] 3.1.1, 3.1.2 The user will get
14 an AP message warning them that the last session
15 ended in error, but it only tells them to check
16 AP transactions, not others.
17   "3.1.3.1 If banking recover is not completed
18 immediately after the counter is replaced, this
19 is reported on the banking reconciliation
20 reports and followed up."
21   So the part of the reply where you say, "We
22 aren't currently checking old event logs for
23 these when doing audit retrievals, and I don't
24 want us landed with even more checks", can you
25 just explain what you're referring to when you

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1 say, in this context, "CRC read failures"?
2 **A.** This is when a message has been -- a Riposte
3 message, when read by a process, either on the
4 counter that it was originally written on or one
5 of the other counters, every time it was read,
6 the checksum on the message was recalculated and
7 if it didn't match it implied there'd been some
8 sort of a corruption, and that would raise
9 a critical red event.
10 **Q.** You say:
11   "We aren't currently checking old event logs
12 for these when doing audit retrievals ..."
13 **A.** As part of the audit retrieval process after
14 2008 sometime, the Security team would also
15 extract the Tivoli events for the branch over
16 the relevant period, and SSC staff would look at
17 those events to see if there was anything of
18 concern. In particular, we were looking for the
19 Riposte lock events which might indicate some
20 silent failure that might not have been noticed
21 at the time.
22   This was a not exactly a time consuming
23 process but it was part of the process. Now
24 we -- I can't remember now but this implies that
25 we wouldn't have seen those CRC read failure

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1 events in that process. They should, however,
2 have been noticed at the time because they were
3 one of the events that the SMC monitoring team
4 were monitoring for, so there should have been
5 a PowerHelp call raised at the time, if these
6 events were occurring on a particular counter.
7   That PowerHelp call would then have been in
8 the audit trail, so this isn't something that
9 would have been happening and then wouldn't
10 notice as part of the -- and would not be seen
11 as part of the audit retrieval.
12 **Q.** You continue that:
13   "[The] SMC normally raise a call and we
14 trash the message store and yet it rebuild ..."
15   What do you mean by that, trashing the
16 message store?
17 **A.** I think that's the bit that I probably didn't
18 want to say, "trash the message store", because
19 it sounds horrible. What it meant was delete --
20 on the affected counter, you would delete the
21 message store at a time when the counter --
22 I mean often -- one thing I can't remember is
23 whether these sort of errors actually shut down
24 Riposte on the counter, which meant that you
25 then couldn't use it or, if it could still be

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1 used. Obviously, if it was unusable, then it's
2 not going to -- this underlying error couldn't
3 possibly cause any financial impact because you
4 can't use the counter. But I cannot remember if
5 that was the case or not.
6   But then trashing the message store is
7 actually deleting the message store file on the
8 affected counter, and then it would rebuild
9 itself, and I can't remember if it used the --
10 and it would then be copied from one of the
11 other counters to get the complete set of
12 messages back in again, and that would then
13 hopefully not have any corruptions in it.
14   Obviously, if this kept happening because
15 you've got a dodgy disk on a counter you might
16 still get more errors being reported and then
17 the action would be to replace the counter,
18 which would, as part of that process, also
19 rebuild the message store.
20 **Q.** Why wouldn't you want to say this?
21 **A.** I think because "trash" is not a particularly
22 good-sounding word.
23 **Q.** But there was an acceptable way to describe what
24 you were doing, wasn't there --
25 **A.** That was --

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1 Q. -- without using the word "trash"?
2 A. Yes, you would say, "delete the message store"
3   that --
4 Q. Yes. Why wouldn't you want to say that? That
5   you were deleting the message store and then
6   letting it rebuild itself?
7 A. I really cannot remember exactly why I put it
8   into those words and, obviously, I wish I hadn't
9   put it into those words but I cannot remember my
10   thinking at the time.
11 Q. I'm not concerned at the moment with the word
12   you used, "trashing the message store", I'm
13   concerned with -- I'm asking you why wouldn't
14   you want to reveal this in a report about
15   Horizon data integrity?
16 A. Yes, again, that's why I can't remember, really,
17   why I said that. It wasn't because I thought it
18   was an absolutely awful of thing to be doing.
19 Q. What other reasons could there be for not
20   revealing it?
21 A. I don't know.
22 Q. Were you saying "What they don't know won't harm
23   them"?
24 A. It certainly looks as if that was what I was
25   saying but, if that is the case, I don't know,

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1   really, why I was saying that, because this was
2   not doing -- this was, you know, to get the
3   counter up and running again with a non-
4   corrupted set of data.
5 Q. Or were you saying, because it's not going to
6   help the Post Office prove Horizon's integrity,
7   let's not tell them?
8 A. No, I don't think I was saying that.
9 Q. Again, can you, reflecting back, think what the
10   reason would be not to reveal this information
11   in a report on Horizon data integrity?
12 A. The only thing I can think of with hindsight is
13   perhaps when these errors should -- had
14   occurred, we should have specifically been
15   looking to see if it could have had any impact
16   on the -- anything, you know, if they were
17   balancing at the time, and that wasn't a check
18   that we were making at the time.
19   But did I think this was a situation that
20   was causing -- was a cause of ongoing problems,
21   you know, no, I don't -- even now, I don't think
22   that was the case. But no, I don't know why
23   I put that sentence in those terms. I think
24   I just wanted to let Gareth know of what the
25   situation was and then he could decide precisely

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1   what he wanted to say about it. But I agree,
2   that doesn't look good.
3 Q. You say, "SMC normally raise a call".
4 A. Yes, that was the process and then that was so
5   we knew to do something about it. Obviously, if
6   we had a call direct from a branch about any
7   sort of problems and then we looked at that
8   call, we would have seen those CRC errors and
9   would have looked to see what needed to be done
10   about it. But I cannot be 100 per cent sure
11   that if they weren't -- if they were saying, you
12   know, that they'd got financial problems and we
13   saw the CRC errors, then, obviously, we would
14   look to see if they could have been a cause of
15   it.
16   But, if we're talking about looking at data
17   retrieved some years or months -- months or
18   years afterwards, again, if we were examining --
19   if we were actually investigating, rather than
20   just doing the audit retrieval, we would look
21   for anything wrong. But, no, sorry, I'm just
22   not getting anywhere with this.
23 Q. Okay. You say the SMC was normally to raise
24   a call. Were there times, therefore, when the
25   SMC failed to pick up this issue or there were

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1   problems that therefore slipped through the net?
2 A. I could not say that they 100 per cent picked up
3   on everything that they were always meant to,
4   but they would certainly have picked up on the
5   vast majority of things like CRC errors.
6   Because that was their job to do.
7 Q. Was there a process to ensure that they ensured
8   that that process always operated as it was
9   intended?
10 A. I don't know what their processes were and how
11   much cross-checking was done by their
12   management.
13 Q. Further down the email, when you're commenting
14   on what were, I think, paragraphs 3.1.1 and
15   3.1.2 of the draft Integrity Report, you say:
16   "The user will get an AP message warning
17   them that the last session ended in error, but
18   it only tells them to check AP transactions, not
19   others."
20   Can you explain what you mean by that,
21   please?
22 A. Not properly, without seeing the underlying
23   document but I think we're talking about what
24   has happened when a counter has failed in some
25   way and it's going into the recovery system,

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1   when the counter becomes available again.
2 **Q.** You continue:
3   "If banking recovery is not completed
4   immediately after the counter is replaced, this
5   is reported on the banking reconciliation
6   reports and followed up."
7   Did you either work in or see BIMS?
8 **A.** The BIMS were produced by the -- what I think of
9   as MSU, Management Support Unit. SSC did not
10   see that system but the data that went into the
11   BIMS reports was often taken from PEAKs, which
12   the MSU raised asking SSC to check out various
13   reconciliation report entries and then we'd send
14   our response back and they would, if necessary,
15   send a BIMS report, often just cutting and
16   pasting our response, and that went to Post
17   Office.
18 **Q.** Your comment on 3.1.3.1, is that a description
19   of what the process was, ie what was supposed to
20   happen?
21 **A.** Yes. I mean, if anything went wrong with
22   banking transactions, there was a huge amount of
23   central reconciliation that was done matching up
24   the counter outcome -- the outcome was known at
25   the data centre -- and also data received from
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1   the various financial institutions, the banks,
2   and so on. And everything was matched up in
3   there and any inconsistencies gave an entry on
4   the banking reconciliation reports.
5   Specifically, in a recovery situation, it's
6   possible that a banking transaction had been
7   authorised by the bank and the money removed
8   from the customer's account but, if it hadn't
9   settled on the counter before the counter
10   failed, then the money might not have -- that
11   transaction would not be included in the branch
12   accounts and so this banking reconciliation
13   process was all intended to get everything into
14   a consistent position, and recovery was part of
15   that.
16 **Q.** So failures in banking recovery were always
17   supposed to be reported accurately on banking
18   recovery reports?
19 **A.** No, if there was any consistency -- any
20   inconsistency between the outcomes and
21   a transaction needing recovery -- a banking
22   transaction needing recovery was going to be
23   incomplete until somebody logged back on to that
24   counter again.
25 **Q.** So that was supposed to be reported on a banking
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1   reconciliation report?
2 **A.** It would all be reported somewhere if there was
3   any inconsistencies.
4 **Q.** It was supposed to be followed up with a BIMS
5   notice; is that right?
6 **A.** It depends what the outcome was. When the
7   recovery was completed, if the branch could
8   confirm whether they'd paid the money out or
9   not, then that would resolve the, you know, the
10   inconsistency, if you like, and then that will
11   get fed through and matched up in the
12   reconciliation system.
13 **Q.** During your evidence back in May, you were asked
14   to consider a circumstance in which a system
15   error was to result in a BIMS notice, and you
16   gave evidence that it wasn't your role to follow
17   up what happened with the BIMS notice and later
18   actions; do you remember?
19 **A.** Yes.
20 **Q.** So where it says here "If banking recovery",
21   et cetera, it is "followed up", again, are you
22   describing the process rather than your
23   knowledge of what actually happened?
24 **A.** This is describing -- yeah, by following it up,
25   I mean that, if necessary, SSC would investigate
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1   what had happened, in some cases would phone the
2   branch to ask them to complete the recovery by
3   logging on to the counter.
4 **Q.** So, essentially, by this email you're adding in
5   some further points that may assist Mr Jenkins
6   to assist the Post Office in refuting claims
7   that Horizon is causing money to be lost; is
8   that right?
9 **A.** I was just trying to clarify where he had put
10   things in his draft that I felt could be perhaps
11   explained. I can't remember, without seeing the
12   draft, whether this is in more detail or saying
13   that, you know -- you know, I knew a little bit
14   more about the process at this level.
15 **Q.** Can we turn, please, to a draft of the report.
16   FUJ00080526. You'll see that under "Document
17   Status" this is marked as a final draft. You'll
18   see in the bottom of the document on page 1 it's
19   version 1.0 and it's dated 2 October 2009. The
20   email exchange we've just looked at was
21   1 October 2009.
22 **A.** Could I just ask, is it possible to have this
23   screen raised up slightly?
24 **Q.** Yes. Do you want to try it yourself? If you
25   grab the top of it. Maybe one of the ushers can
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1   assist.
2 **A.** Yes, that's right better. Thank you.
3 **Q.** We were looking at the date at the bottom,
4   2 October 2009, the day after your email.
5 **A.** Yeah.
6 **Q.** Then if we can go to page 3, please. We can see
7   the version number. 0.1b is said to be dated
8   2 October 2010, I think that must be a typo for
9   2009. Then:
10   "First informal draft. Changes from version
11   0.1a were marked in red (like this) with
12   strikeout for significant deletions."
13   Then this version, 1.0 "Version for release
14   to Post Office".
15   Yes?
16 **A.** Yes.
17 **Q.** It's those, 0.1a and 0.1b, that I don't think
18   that we have got. If you just look down at the
19   reviewers, you don't seem to be listed there --
20 **A.** No.
21 **Q.** -- and yet you did review?
22 **A.** Yes, I don't know how informal that first draft
23   was but, yes, I did review it.
24 **Q.** Would that sometimes be the case, that if you
25   were an informal reviewer, you wouldn't be

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1   listed?
2 **A.** I don't know, I wasn't -- no, I don't know.
3 **Q.** Or is this a description of those who are to
4   review this draft, rather than those which had
5   reviewed previous drafts?
6 **A.** Yes, that could well be. I mean, we are now up
7   at a far higher level, if you like, of people
8   than the level at which I worked. And I note
9   that Chris Bailey and Alan Hodgkinson aren't on
10   there either. So I assume, you know -- maybe,
11   you know, Gareth had just asked around useful
12   people to try to get a picture in his first very
13   informal draft.
14 **Q.** Can we go to page 5, please. We can see the
15   purpose of the document set out:
16   "This document is submitted to Post Office
17   for information purposes only and without
18   prejudice."
19   You can see at the top it says in
20   "Commercial in Confidence and Without
21   Prejudice". It says:
22   "In the event that Post Office requires
23   information in support of a legal case Fujitsu
24   will issue a formal statement.
25   "This document is a technical description of

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1   the measures that are built into Horizon to
2   ensure data integrity, including a description
3   of several failure scenarios, and descriptions
4   as to how those measures apply in each case."
5   So that's the purpose of the document. Then
6   if we go to page 6, please. There is the
7   section on Horizon data integrity.
8   If you scroll down, please, if you just see
9   the paragraph that's now at the top of the page:
10   "Every record that is written to the
11   transaction log has a unique incrementing
12   sequence number. This means it is possible to
13   detect if any [transactions] have been lost."
14   Then right at the foot of the page:
15   "Each record generated by a counter has
16   an incremental consequence number and a check is
17   made that there are no gaps in the sequencing."
18   So that is, I think, the first comment you
19   made, that, whereas the sequence number had been
20   referred to by Mr Jenkins in the audit section,
21   which is what this part of the report is, it
22   could usefully be explained earlier. Can you
23   see that at the top?
24 **A.** Yes, because -- yes.
25 **Q.** Then the second point that you made in your

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1   email "If there are CRC errors, SMC normally
2   raise a call and we trash the message store and
3   let it rebuild but we probably don't want to say
4   that, but if we don't say, will they ask",
5   that's not referred to here or, indeed, so far
6   as I can tell, anywhere in the report. Do you
7   think, because that was a potentially tricky
8   point, it was left out?
9 **A.** I don't know. I mean, what we were doing was
10   fixing the problem and not in a particularly
11   tricky way. It was the clean way to fix the
12   problem. I don't know what Gareth had said
13   about it before. I think what he's put there is
14   correct but what he doesn't do is go into any
15   detail as to the action that was taken when it
16   did happen.
17 **Q.** Then if we go forwards, please, to 3.1.1 and
18   3.1.2 on the next page and just scroll down,
19   please. Do you remember these were the
20   paragraphs, 3.1.1 and 3.1.2 --
21 **A.** Yes.
22 **Q.** -- where you had said "The user will get an AP
23   message warning them that the last message ended
24   in error but it only tells them to check AP
25   transactions, not others"?

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1 A. Yes.
2 Q. I think the point you were making, is this
3   right, is that the subpostmaster was not getting
4   information telling them to check all
5   transactions, only the AP transactions, yes?
6 A. Yes. I mean, AP transactions were different to
7   other transactions in that they were
8   recoverable, whereas other transactions were
9   not.
10 Q. So why were you raising that point, to make the
11   distinction that the subpostmaster wasn't
12   getting a message to check other transactions?
13 A. It must have been something that was in the
14   previous draft where I felt there was --
15   a little bit of clarity was needed but I can't
16   remember.
17 Q. It doesn't look as if your point has been
18   addressed here, does it, in 3.1.1 and 3.1.2?
19 A. Unless there had been a sentence in saying that
20   the user will be prompted.
21 Q. Which has now gone?
22 A. Which has now gone. That is possible.
23 Q. Thank you very much, that's all I ask on the
24   second topic.
25   Sir, I wonder whether that would be
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1 A. Yes, but --
2 SIR WYN WILLIAMS: Had there been -- yes, the
3   transition to Horizon Online hadn't yet
4   occurred?
5 A. No.
6 SIR WYN WILLIAMS: Fine. Sorry. I just wanted to
7   be clear in my mind about that. Thank you.
8   Yeah. Yes, let's have our morning break.
9 MR BEER: Sir, 11.30, then please.
10 SIR WYN WILLIAMS: Yes, fine.
11 MR BEER: Thank you.
12 (11.15 am)
13   (A short break)
14 (11.30 am)
15 MR BEER: Good morning, sir, can you see and hear
16   me?
17 SIR WYN WILLIAMS: Yes, I can, yes.
18 MR BEER: Thank you.
19   Mrs Chambers, can we turn to the third
20 topic, please, which is informal examination of
21 issues within the SSC and the process for the
22 examination of issues within the SSC that may
23 end up in court proceedings.
24   Can we start, please, by looking at an email
25 chain. FUJ00156153. I should make clear that
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1   an appropriate moment with the morning break?
2   Sir, you're still on mute.
3 SIR WYN WILLIAMS: It would but I may have
4   misunderstood something. I think it's page 5 of
5   that document, but there is certainly a page
6   that we've looked at, which describes the
7   version of Horizon to which it relates. Have
8   I misunderstood that?
9 MR BEER: Yes, that is page 5.
10 SIR WYN WILLIAMS: And --
11 MR BEER: It's the last sentence.
12 SIR WYN WILLIAMS: This document only covers
13   Horizon. It does not cover HNG-X, Horizon
14   Online. Am I being too simplistic? Does that
15   mean that it only covers the version of Horizon
16   which existed until Horizon went online?
17 A. Yes, this covers the -- what we sometimes call
18   Legacy Horizon, which was based all around the
19   Riposte system because the data integrity side
20   of things, it was all to do with the way that
21   Riposte was working behind the scenes. Horizon
22   Online was based on a totally different set of
23   centrally-held databases.
24 SIR WYN WILLIAMS: Sure, and at the date of this
25   document, Legacy Horizon still existed?
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1   this isn't an email chain that you were included
2   on but I'm going to ask you questions about
3   whether what's in it reflected the position at
4   the time.
5   Can we go to page 3, please, and look at the
6   foot of the page, which is the first in the
7   chain. Foot of the page, please. Thank you.
8   So 2 June 2010, from Penny Thomas to Steve
9   Parker:
10   "Hi Steve
11   "You wanted to change the way we request
12   these checks to PEAK ..."
13   The subject is "Event Analysis via PEAK":
14   "... and I think we need to agree the
15   format; have you got a few minutes to agree
16   process?"
17   At this time, we can see who -- and we know
18   who -- Mrs Thomas was, a security analyst. What
19   position did Mr Parker hold in June 2010? Was
20   he the manager of the SSC by then?
21 A. I think so. He took over certainly around about
22   then, so I assume that, yes, he was the manager.
23 Q. So your line manager?
24 A. Yeah.
25 Q. Then if we scroll up, please. We can see his
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1   reply:
2   "Penny,
3   "Yes, I'd like to change it as well so that
4   we get formal PEAKs raised for ARQs as discussed
5   last week, establish audit trail, spread the
6   work, etc."
7   What do you understand that first part to
8   mean, "We get formal PEAKs raised for ARQs"?
9 **A.** I presume it means, so for each -- for each ARQ
10   extract that the Security team were doing,
11   where, by this point, we were also checking any
12   events that were raised in the same period, that
13   the request for SSC to make those checks, each
14   one would have a PEAK raised for it.
15 **Q.** So for each request for an ARQ, there was
16   an equivalent PEAK?
17 **A.** Yes, effectively they'd do the ARQ extract of
18   the transaction data and Riposte events. They'd
19   also get the Tivoli events and then raise the
20   PEAK, with the Tivoli events attached, and route
21   it to SSC for us to examine.
22 **Q.** Would you understand why it would be necessary
23   or desirable to establish an audit trail?
24 **A.** I presume just so that somebody could say, if
25   asked, "Yes, those events have been checked by
<div align="center">53</div>

1   somebody in the SSC".
2 **Q.** Would that be in the context of court
3   proceedings or in other contexts too?
4 **A.** I don't know.
5 **Q.** Okay:
6   "Before I can do this we may need to talk to
7   Tom as well."
8   I think that must be a reference to Tom
9   Lillywhite. Can you see him amongst the copy
10   list?
11 **A.** I can see him, yes.
12 **Q.** Do you remember who he was?
13 **A.** No.
14 **Q.** "I'm concerned that if we put this on a formal
15   level like this it may mean that further down
16   the line random members of the SSC get
17   a subpoena and we have to testify. If there is
18   any chance of this happening then we (SSC) will
19   not be giving guidance on the events. We need
20   guidance from Tom (or Fujitsu legal) on how we
21   protect ourselves from the possibility of court
22   appearance before we formalise the process?"
23   Can you recall a concern within the SSC at
24   about this time, that's mid-2010, that the SSC
25   should not be giving guidance or speaking to ARQ
<div align="center">54</div>

1   data because it may result in the SSC giving
2   evidence in legal proceedings.
3 **A.** I don't remember anything specifically from 2010
4   but I think, after I gave evidence in 2006, the
5   SSC management were not keen on any SSC members
6   having to be put in that position again.
7 **Q.** Why were they keen that members of the SSC
8   should not give evidence?
9 **A.** Because they felt it was not our job to give
10   evidence.
11 **Q.** Do you know why they felt it was not your job to
12   give evidence?
13 **A.** Because we'd had no training, it was not part of
14   our job description. You know, we did not take
15   on the job thinking that we might find ourselves
16   in court.
17 **Q.** Was that a theme, that was the subject of
18   discussion, that there was a need for the SSC to
19   protect itself from the possibility of giving
20   evidence in court?
21 **A.** Yes, I think that was how our management felt.
22 **Q.** What about individual members of the SSC too?
23 **A.** Yes, I don't think -- I don't think any of us
24   had ever joined a support team thinking that
25   that is where we might end up.
<div align="center">55</div>

1 **Q.** So, although there was a desire to formalise
2   matters, is this right: you would understand
3   what Mr Parker is saying here, that that
4   formality can't come at the expense of exposing
5   ourselves to court appearances?
6 **A.** That seems to be what he's saying there, yes.
7   I'm not sure that I was aware of this discussion
8   at the time, though.
9 **Q.** That was my next question: did you understand
10   the relationship between a formal process for
11   administering potential litigation cases and
12   an increased possibility of a court appearance
13   by SSC staff?
14 **A.** I'm not sure that that was anything I was
15   thinking about at the time when I was checking
16   these events. But, obviously, it was a --
17   appears to have been of concern to Steve.
18 **Q.** Ie an instruction, keep in informal, do things
19   by email and discussion, otherwise you may
20   expose yourself to giving evidence in court?
21   Did that come down to the workers in the SSC?
22 **A.** I don't recall anybody ever saying that.
23 **Q.** Okay, let's read on, please. Scroll up. We can
24   see Penny Thomas's reply:
25   "OK, Steve, I'll continue requesting via
<div align="center">56</div>

1   email until you are fully satisfied that [the]
2   SSC are protected."
3   Yes?
4 **A.** Mm.
5 **Q.** Scroll up still further, please. We can see
6   Mr Parker refers it on to Mr Lillywhite:
7   "Tom,
8   "Any comment on this please?
9   "It is important for the ARQ process that
10   SSC examine the events generated and then
11   comment on their potential impact on the
12   financial status of the branch."
13   Would you agree with that?
14 **A.** Yes.
15 **Q.** "This has been done in the past on an informal
16   basis (email to Anne Chambers normally!) ..."
17   Is that right, that it was normally you that
18   received these informal requests via email?
19 **A.** I don't actually remember. I'd forgotten that
20   this was done on an informal basis at any point.
21   But that's what it says. So ...
22 **Q.** "... but that informal process leads to requests
23   being lost when somebody may be on leave, etc.
24   "We need to formalise this but I'm concerned
25   about the legal implications. SSC staff are not

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1   there was any discussion, when that process
2   started, that we might then be expected to
3   appear in court about it.
4 **Q.** No training or guidance that "Look, if you do
5   end up in court, the court has certain
6   requirements for somebody that's performing
7   a task of specialist expertise" --
8 **A.** No.
9 **Q.** "-- such as retention of working notes,
10   retention of copy documents"?
11 **A.** No.
12 **Q.** The duties that you might owe to a court?
13 **A.** No, there was no discussion or training. There
14   was, I believe, a KEL that sort of outlined the
15   sort of things that -- the events that we needed
16   to check, but it was purely technical.
17 **Q.** Mr Parker continues:
18   "If there is any possibility of a court
19   appearance or a witness statement being required
20   then we have to refuse to process the ARQ
21   requests.
22   "Do your own what the legal situation is
23   here?"
24   Do you recall that, that it got to the stage
25   that, such was the concern about the possibility

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1   trained on evidential requirements or as
2   witnesses in court."
3   That's something that you've just mentioned?
4 **A.** Yeah.
5 **Q.** Just stopping there, I'm going to come back to
6   ask you some questions about that in the context
7   of the *Lee Castleton* case. In general terms,
8   were you ever given any guidance on when you
9   were carrying out enquiries and carrying out
10   investigations in a case that may end up in
11   litigation, that you had to do or not do certain
12   things as a potential witness, like retaining
13   your working notes?
14 **A.** I think you're -- when we were just looking at
15   ordinary support calls, I don't think it
16   occurred to any of us at the point at which we
17   were doing that investigation that it could, at
18   some point in the future, result in us needing
19   to be a witness.
20 **Q.** Just stopping there, I'm not asking about those
21   ordinary support calls, as you describe them.
22   I'm talking about these informal requests from
23   Security?
24 **A.** Yes, I don't think anybody, when we started
25   checking these Tivoli events, I don't think

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1   of giving a witness statement or making a court
2   appearance, that the SSC would refuse to look at
3   the ARQ data?
4 **A.** No, I think I was completely unaware of any of
5   this.
6 **Q.** This refers to emails being sent to you on
7   an informal basis asking you to do this work.
8   Did that continue or can't you remember?
9 **A.** As I said, I don't remember ever doing it by
10   email. We did switch to PEAKs being raised and
11   then they were shared out, so it wasn't always
12   me doing them.
13 **Q.** Scrolling up the page, please. Thank you. We
14   can see Mr Lillywhite's reply.
15   "If there is indeed legal implications, and
16   you are all agreed on that then I think we seek
17   advice from our legal department ... it is too
18   important to get wrong!"
19   Then up to page 1, please, and then scroll
20   up, please, to look at Mrs Thomas' email. We
21   can see her reply:
22   "I am not convinced there is, Tom."
23   You remember he said if there are legal
24   implications on the SSC staff undertaking
25   investigation of these events and looking at ARQ

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1   data. She says:
2   "I am not convinced there is, Tom.
3   "While Anne has been helping us she has been
4   fully shielded from any form of [Post Office]
5   litigation. Why would we specifically identify
6   the checking of events as more vulnerable than
7   any other part of the process considering the
8   total end-to-end process employed here? The
9   names of those checking events for us are not
10   notified to the [Post Office] and we have the
11   ability to identify and select any expert
12   witness we consider appropriate to support [the
13   Post Office's] prosecutions. No one in the
14   company can be forced to sign a witness
15   statement if they do not want to; and [the Post
16   Office] cannot cherrypick our staff.
17   "Gareth has the responsibility of covering
18   transaction records for all litigation facing
19   activity until now and there has been no issue.
20   Do we need to life a suitable 'expert' to cover
21   event filtration and analysis? That's another
22   question."
23   Was that the subject of discussion within
24   the SSC, that you had been shielded from
25   involvement in Post Office litigation?

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1   A.   I don't recall it ever being discussed.
2   Obviously, I knew that, after the Marine Drive
3   case that I'd been involved in, Gareth had taken
4   on subsequent witness statements and trials but
5   I don't recall any discussion about it.
6   Q.   What about the point that the names of those
7   checking events for us are not notified to the
8   Post Office? Was that an instruction that was
9   given, "Don't tell the Post Office who carried
10   out the work because, otherwise, they might end
11   up a witness in court"?
12   A.   No, I don't recall that ever being said or
13   discussed.
14   Q.   Was the facility available to obscure from the
15   Post Office who was carrying out the work,
16   checking the events analysis?
17   A.   I don't know what got passed to the Post Office
18   as a result of the events analysis. I mean,
19   that all just went straight back to the Security
20   team and I don't know precisely what Penny then
21   passed on as part of the ARQ data.
22   Q.   Do you recall whether you or others in the team
23   were told, "Don't worry, even though you're
24   responding to these informal requests for
25   analysis, we shield you by not revealing who

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1   undertook the work when we passed the product
2   back to the Post Office"?
3   A.   I don't recall any of us ever explicitly
4   worrying about that or thinking that it was
5   something to be concerned about.
6   Q.   As a means of ensuring that what happened in the
7   Marine Drive case didn't happen again, that the
8   SSC was dragged into giving evidence?
9   A.   I don't think it was something that we were
10   particularly thinking about. The checking of
11   the events was a task that needed to be done and
12   we did it and passed it back. I don't think we
13   considered possible consequences, although, in
14   the light of Marine Drive, maybe it's something
15   we should have been more alert to but, no, it
16   wasn't something we were talking about or
17   considering.
18   Q.   After Marine Drive, I think it's right that
19   no-one from the SSC did give evidence again?
20   A.   Yeah.
21   Q.   Do you know how that came about?
22   A.   I presume that was a decision by the management,
23   who, I think for various reasons, weren't happy
24   that I'd had to give evident in the first place.
25   Q.   But you in the SSC carried on doing the

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1   analysis --
2   A.   We did --
3   Q.   -- and passing it back to Security?
4   A.   I became involved in Marine Drive because
5   I dealt with the original support call from the
6   branch, which did not go back to Security
7   because it went back to Marine Drive. Where
8   I -- I mean, after that, I think Gareth took
9   responsibility for making checks on other
10   branches for the transaction data for
11   litigation, where it was coming in through the
12   Security team, and I, occasionally, a few
13   occasions, possibly helped him with some of that
14   analysis but --
15   Q.   Were you doing so in the knowledge that your
16   identity would not be revealed to the Post
17   Office so there was no prospect of you having to
18   give evidence?
19   A.   I think I always assumed that it would be Gareth
20   giving evidence. I don't think I considered
21   whether my identity or my involvement was being
22   hidden to protect me or anything. By that point
23   it just seemed to be the process that Gareth, as
24   it says here, had taken that responsibility.
25   Q.   Do you know how that process came about? That

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1   Gareth had taken responsibility?
2 **A.** No.
3 **Q.** Can we turn to the fourth issue then, please,
4   that can come down.
5   Back when you gave your evidence on 3 May,
6   you described an occasion when the Post Office
7   had wanted to insert transactions without the
8   branch being aware. I'll just read back the
9   questions and answers. The question was:
10   "Was there any method to alert others that
11   corrective action had been taken to insert data
12   or extra messages into a branch's account?"
13   You said:
14   "The ARQ data would contain both the
15   original transaction and the corrective
16   transaction, at the point at which they were
17   done. If the full, unfiltered data was
18   retrieved and inspected, then that would show
19   the comment, for example. Certainly, sometimes,
20   for counter corrections -- and it wasn't done
21   consistently -- but we often might use a counter
22   number that didn't exist to make it clear that
23   it was something out of the ordinary or
24   a username, including SSC, again to show that it
25   was something out of the ordinary.
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1   "That wasn't done on this specific one and
2   I cannot remember whether that was because I was
3   specifically asked not to or I was just
4   producing a transaction that was absolutely
5   a mirror of the one that shouldn't have been
6   there in the first place and all I did was
7   change the signs of the values, effectively and
8   all I -- I left all the other data in there as
9   it was."
10   So remembering back what you were saying and
11   just to synthesize it, you were saying,
12   sometimes, a fictitious counter number was used
13   to mark out the transaction correction?
14 **A.** As I recall, yes.
15 **Q.** Secondly, you were saying but that wasn't done
16   consistently, ie the use of a fictitious counter
17   number to mark out the fact that SSC had made
18   a correction?
19 **A.** Yeah.
20 **Q.** Thirdly, you were doing that, or the SSC was
21   doing that, deliberately, ie using the
22   fictitious counter number, because you would
23   want to show that an SSC member had been making
24   the correction?
25 **A.** Yes.
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1 **Q.** But, fourthly, there might be occasions when you
2   were specifically asked not to use the
3   fictitious one?
4 **A.** I don't think we were ever asked not to use
5   a fictitious one.
6 **Q.** It was just a passage of your evidence where you
7   said "That wasn't done on this occasion and
8   I can't remember whether that was because I was
9   specifically asked not to", which tended to
10   indicate that you were saying that you may have
11   been asked not to use the fictitious number?
12 **A.** I don't recall ever being asked not to do that
13   and I can't remember which specific instance
14   we're talking about here. Sorry.
15 **Q.** Overall, does it mean that it was possible for
16   members of the SSC to insert transactions using
17   the branch user ID?
18 **A.** Right, you're talking about user ID here now,
19   rather than counter number, but, yes, it was --
20   I mean, the messages that we inserted could have
21   contained the branch user ID.
22 **Q.** Would it follow that standard filtered ARQ data
23   would not distinguish those insertions from
24   those that were, in fact, carried out in the
25   branch?
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1 **A.** The standard ARQ data, yes. You might not be
2   able to see the difference.
3 **Q.** So transactions which appeared in the standard
4   filtered ARQ data, for example, in
5   Mr Castleton's case, with his ID user number
6   next to them, would not necessarily mean that
7   they were carried out by him?
8 **A.** It would have been possible, yes, for SSC to put
9   transactions in, that --
10 **Q.** Using his ID?
11 **A.** Using his ID.
12 **Q.** Without leaving a fingerprint on the standard,
13   filtered ARQ data that that had been done?
14 **A.** Yes, I think that would have been possible.
15 **Q.** It shouldn't have been done but it could be
16   done?
17 **A.** Yes, I don't think there's anything that would
18   have prevented that. I don't believe that was
19   done but I can't say it's an impossibility.
20 **Q.** Thank you.
21   Can I turn then to Mr Castleton's case and
22   begin with what you did and didn't know, what
23   information you did have and what information
24   you didn't have, and the stage at which you
25   became involved. I'm going to try and do it
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1 chronologically, including by establishing what
2 had happened before your first involvement,
3 which was, I think, on 26 February 2004, yes?
4 A. Yes.
5 Q. I'm afraid there's quite a long run-up to the
6 wicket here but I just want to see what had
7 happened before you became involved.
8 A. Certainly.
9 Q. Can we start, please, with the first call on
10 14 January 2004. You address this in your
11 witness statement, please. So that is
12 WITN00170200.
13 I'm told, sir, that's not on the system,
14 which is remarkable because it's Mrs Chambers'
15 38-page second witness statement. Maybe if
16 I just hand my copy of it to the operators to
17 see whether it's an error in my reading.
18 Sir, we probably need to take a break, then,
19 if that is indeed not on the system.
20 I apologise for this. Can we leave it that
21 we'll come back to you when it is on the system,
22 please.
23 SIR WYN WILLIAMS: Okay. That's fine. Do you want
24 me to sit in my chair, so to speak, for a few
25 minutes or can I wander around safely for at
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1 something that was ever available to me during
2 my time at Fujitsu. As I have explained in my
3 first statement, there was a clear division
4 between business investigations conducted by
5 NBSC and system investigations conduct by SSC.
6 I can see now from this document that there was
7 a call about a discrepancy at Marine Drive on
8 14 January 2004 and another a week later on
9 21 January 2004, and the record shows NBSC as
10 assisting the postmaster to make checks at that
11 time."
12 So where you say, "this is the first time
13 that I've seen the NBSC call log", do you mean
14 you've been provided a copy of the document by
15 the Inquiry --
16 A. Yes.
17 Q. -- and this is the first time in the 19 years
18 since the relevant events that you have seen the
19 call log?
20 A. I didn't see the call log at the time and I have
21 not seen it -- I had never seen it until it was
22 provided as part of the evidence set with the
23 Rule 9 request.
24 Q. So you say:
25 "This is not something that was ever
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1 least five minutes?
2 MR BEER: The latter, please, sir, and we'll get you
3 a message one way or another when we're to
4 reconvene. Thank you very much, sir.
5 (12.02 pm)
6 (A short break)
7 (12.19 pm)
8 MR BEER: Good afternoon, can you now see and hear
9 me?
10 SIR WYN WILLIAMS: Yes, I can, thank you.
11 MR BEER: Thank you. Apologies for that protracted
12 delay.
13 Can we look, please, at WITN00170200, and
14 can we go, please, to page 3 of your witness
15 statement and look at paragraph 10, please.
16 I should have taken you to the heading at the
17 top of the page "Involvement in relation to
18 Marine Drive Post Office and the litigation
19 against Lee Castleton".
20 So this is the section of your statement,
21 indeed the rest of the statement, which deals
22 with Mr Castleton's case. At paragraph 10, you
23 say:
24 "I have now been provided with a copy of the
25 NBSC call log for Marine Drive. This is not
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1 available to me during my time at Fujitsu."
2 To be clear, it wasn't available to you when
3 you investigated the issue at Marine Drive back
4 on 26 February 2004 --
5 A. It was not available to me then.
6 Q. -- and it was not available to you when you were
7 asked to look at a wider range of issues in 2006
8 in preparation for the court case concerning
9 Mr Castleton?
10 A. No, it wasn't available to me then and I don't
11 recall being asked to look at wider issues at
12 that time either.
13 Q. We know that, for example, you were told, before
14 you gave evidence at the High Court, that you
15 may be asked questions about the Callendar
16 Square/Falkirk bug?
17 A. Yes, I was told that that was going to come up
18 and I should be ready to answer questions about
19 that.
20 Q. As part of preparation, you weren't shown a copy
21 of the NBSC call log?
22 A. No.
23 Q. You tell us in this statement that there was
24 a clear division between business investigations
25 conducted by the NBSC and systems investigations
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1 conducted by the SSC. Is that the reason why
2 you in the SSC didn't see the NBSC call log?
3 **A.** I presume so. NBSC was a Post Office
4 organisation, totally separate from Fujitsu and
5 I don't think at the Helpdesk levels they --
6 either side had view of the others' calls.
7 **Q.** The information we're going to look at in
8 a moment, concerning events on 14 January 2004
9 and the 21 January 2004, would that have been
10 helpful context for you to have had access to,
11 to the investigation that you were to carry out?
12 **A.** I don't think there was any additional evidence
13 that would have been of help to me in the NBSC
14 logs because I think that the Horizon Helpdesk
15 had captured certain -- the majority of the
16 information. Again, either -- I'm not sure now
17 whether they got some of this information by
18 talking to the NBSC agents or by talking direct
19 to Mr Castleton, but the Horizon Helpdesk had
20 captured, in various calls, I think probably all
21 the pertinent information about what
22 Mr Castleton was saying.
23 **Q.** Okay, we'll look at that as we go along. Can
24 you explain, in general terms, how you were
25 passed information from the HSH, the Helpdesk?

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1 **A.** They would log the information on their
2 PowerHelp call -- I think that was what the
3 calls were called at that point in time -- and
4 then they'd route the PowerHelp call on to
5 a PEAK or PinICL stack, and that would
6 automatically raise -- I can't remember if it
7 was PEAKs or PinICLs at this precise point in
8 time -- and would paste the information -- the
9 information that had been recorded on the
10 PowerHelp call would also go onto the -- would
11 automatically go onto the newly raised PEAK that
12 would then be on the SSC stack.
13 **Q.** How would you be passed information from the
14 NBSC?
15 **A.** We were not passed information directly. It was
16 a matter of the HSH having recorded it on their
17 own call -- PowerHelp call that they had raised.
18 **Q.** If you wanted to ask for more information from
19 HSH, how would you do that?
20 **A.** If we felt that there was insufficient
21 information from HSH, then we would route the
22 call back to them saying we need some more
23 information.
24 **Q.** If you wanted information from the NBSC, how
25 would you do that?

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1 **A.** We very rarely contacted anybody at NBSC.
2 I can't say we never did because I know there
3 are a few calls where I did talk to, I think,
4 somebody called Ibrahim but, I think in general,
5 it was HSH's responsibility to get a clear
6 picture of what the postmaster said the problem
7 was and then to route it on to us. I could have
8 talked -- contacted the postmaster myself also,
9 if I needed more information, but in this case
10 I didn't.
11 **Q.** So, essentially, the Fujitsu HSH, the Helpdesk,
12 were your agents, were your facility for
13 obtaining information from either the postmaster
14 or NBSC?
15 **A.** Yes. I'm not sure how often they would go back
16 to NBSC to ask for more information themselves
17 either, but certainly they would -- they were
18 expected to get a clear picture from the
19 postmaster before sending the call over to SSC.
20 **Q.** Thank you. Can we look, then, at this first
21 record of the call, then.
22 **SIR WYN WILLIAMS:** Sorry, Mr Beer, before we do
23 that -- and this may appear very pedantic --
24 but, given the date on Mrs Chambers' second
25 witness statement, has she actually ever vouched

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1 for its accuracy at the Inquiry?
2 **MR BEER:** That's a really good point!
3 **SIR WYN WILLIAMS:** I don't think she could have,
4 really.
5 **MR BEER:** Well, given that I couldn't have displayed
6 it if I wanted to, you're right to pick me up on
7 it.
8 **SIR WYN WILLIAMS:** It's all right.
9 **MR BEER:** With your leave, then, sir, shall we do
10 that now?
11 **SIR WYN WILLIAMS:** Yeah, I think it must be the case
12 that she hasn't done it. So we'd better do it
13 and now is as good a time as any.
14 **MR BEER:** Turn to page 34, please. Is that your
15 signature?
16 **A.** Yes, that is my signature.
17 **Q.** I don't believe we're in the territory of you
18 wishing to make corrections to the witness
19 statement?
20 **A.** No.
21 **Q.** Are the contents of it true to the best of your
22 knowledge and belief?
23 **A.** Yes.
24 **Q.** Thank you.
25   Thank you very much, sir, for your eagle

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1   eyes.
2   Can we look, please, at the first record of
3   the call made by Mr Castleton, 14 January 2004.
4   It's LCAS0000365. Can we turn, please, to
5   page 18.
6   We can see here the NBSC call log, yes? Do
7   you recognise it now?
8 A. I recognise it having been sent it by the
9   Inquiry. I wouldn't have known what I was
10 otherwise.
11 Q. Just looking along the top line to orientate
12 ourselves, "Date" -- I think that's the call
13 taken, first column; the "Incident ID", the
14 second column; a "Brief Description" of the
15 event, third column; a "Detailed Description" of
16 the event", fourth column; "Resolution", fifth
17 column -- do you know what "KB" means?
18 A. No. I might guess "Knowledge Base" but that's
19 a guess.
20 Q. A cross-reference to the "Incident Log";
21 a record of the nature of the call, the "Call
22 Type"; who the client was; the "Activity"; the
23 "Sub-Activity"; the branch code, the "FAD code";
24 and the name of the Post Office concerned. Yes?
25 A. Yes.
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1 Q. Can we go, please, to page 25. Can you see,
2   please, that this is an entry of 14 January
3   2004 --
4 A. Yes.
5 Q. -- at the foot of the page.
6 A. Yeah.
7 Q. So this is the first relevant entry that we're
8   going to look at, the first contact between
9   Mr Castleton and the Post Office. The 14th is
10 a Wednesday, okay? Take it from me. We can see
11 the brief description is "Discrepancy", and then
12 the detailed description is a discrepancy of --
13 and I think we can tell from looking elsewhere
14 in the document where the hash sign appears,
15 that's a pound sign, essentially --
16 A. Yes.
17 Q. -- of £1,103.13 loss. Resolution, KB. If that
18 does mean "Knowledge Base", what would that
19 mean?
20 A. I've no idea. This was the NBSC system which
21 I had nothing to do with.
22 Q. We can see some cross-reference to an incident
23 log; the call type, "Horizon Balancing"; the
24 activity, "Cash Account Discrepancy";
25 sub-activity "Discrepancy"; and then the branch
                    78

1   code and the office name.
2 A. (The witness nodded) Yes.
3 Q. If we just scroll down to the next page, we can
4   see there's nothing else. It moves on to
5   a different date, yes?
6 A. Mm-hm.
7 Q. Now, if we go back to that page, on 14 January,
8   what was your understanding of what should be
9   done where a postmaster reported a discrepancy
10 of, say, £1,000?
11 A. I would expect, and I don't know, that NBSC
12 would possibly help him to look through various
13 reports, and so on, to see if there could have
14 been any errors in recording data that might
15 have led to that loss. I mean --
16 Q. Just to be clear, I realise, of course, you
17 didn't work in the NBSC. This was not your
18 function. The purpose of these questions is to
19 understand what you knew about what had been
20 done before a call came across your desk.
21 A. Yeah.
22 Q. So on the face of this, it looks like nothing
23 was done in relation to the report of £1,000
24 loss; would you agree?
25 A. I don't know what they would have told him, and
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1   I think you have to bear in mind that, you know,
2   discrepancies at branches are not at all
3   unusual. Every branch will have had losses or
4   gains occasionally, which they will then have
5   tried to resolve. I mean, obviously making sure
6   that the cash has been counted correctly and
7   that what they've recorded on the system, which
8   they can check against the reports, is actually
9   what they have done in the office.
10 Q. Yes, and, on the face of it, there isn't any
11 record of that having been done on this
12 occasion?
13 A. It's not written down there but I've no idea
14 what the NBSC procedures were.
15 Q. But something is supposed to be done, isn't it,
16 when a postmaster reports a discrepancy of
17 £1,000?
18 A. I don't know what the procedures were. I would
19 still say that, you know, that the first thing
20 is to look for differences between what is on
21 the system and what actually took place in the
22 office, because that is the cause of
23 discrepancies.
24 Q. Okay. Can we move forwards a week, then, to
25 21 January 2004, and look at page 28. So this
                    80

1   is the following Wednesday, and you'll see that
2   it's a discrepancy, again; can you see that?
3 **A.** Yes, I can.
4 **Q.** The detailed description is:
5   "[Postmaster] has cash account discrepancy
6   of £4,294.67."
7 **A.** Yes, I see that.
8 **Q.** In the resolution is:
9   "[Subpostmaster] still has a loss and has
10   logged the call with suspense."
11 **A.** Yes.
12 **Q.** What was your understanding of the suspense
13   account?
14 **A.** That was somewhere to which they could move
15   losses or gains while they were being
16   investigated but I think they were meant to get
17   authorisation from a particular team in the Post
18   Office in order to do that.
19 **Q.** Was it your understanding -- I mean, it says
20   here "and has logged call with suspense" -- that
21   it was he, the postmaster, that had to log the
22   call with suspense or the NBSC logged the call
23   with suspense?
24 **A.** I don't have any knowledge of the process.
25 **Q.** But one of the two would refer the gain or loss
<div align="center">81</div>

1   to a team dealing with suspense accounts; is
2   that right? You understood that?
3 **A.** I think that's probable but, really, this was
4   completely outside my knowledge.
5 **Q.** The next column recalls, after the text in lower
6   case, in uppercase:
7   "Checked through transaction logs with
8   [subpostmaster] and nothing showed except the
9   DDN."
10   Did you understand that to refer to
11   a discrepancy?
12 **A.** Yes.
13 **Q.** "Advised I will call him back tomorrow to see if
14   anything came to light when he balanced OOH ..."
15   Out of hours, or wouldn't you know?
16 **A.** Seems likely.
17 **Q.** "... and log call with suspense if necessary."
18   So this is before the postmaster, is this
19   right, has balanced a record of the NBSC saying,
20   "You're telling me you've got a loss. Let's
21   wait until you balance the next day and, if it's
22   still there, we'll log the call with suspense"?
23 **A.** Yes, I seem to remember that Mr Castleton tended
24   to start going through the balancing process on
25   the Wednesday afternoon and the 21st would have
<div align="center">82</div>

1   been a Wednesday.
2 **Q.** Yes.
3 **A.** But he didn't usually complete the final balance
4   and produce a cash account until first thing on
5   the Thursday morning.
6 **Q.** But, if you'd been reading this at the time, you
7   would have understood this to be a postmaster
8   saying, "Look I've already got a discrepancy"
9   and they're saying "You need to sign off your
10   cash account the following day and see whether
11   it's there".
12 **A.** If he hadn't got as far as the final balance, if
13   he'd just done a trial balance, that would have
14   produced a discrepancy, but he could then have
15   gone back through to try to see if he could spot
16   any reasons for that discrepancy. He could then
17   have changed the cash declaration, or whatever
18   other figures, and done another trial balance.
19   So he's started the process to the point
20   that he's realised it's going to show -- it has
21   created a discrepancy but he hasn't actually
22   completed the rollover process.
23 **Q.** So "I'll call back tomorrow to see if anything
24   came to light", so that's the 21st. If we go
25   over the page to the 22nd, we are at the next
<div align="center">83</div>

1   day. Brief description, "Discrepancy":
2   "[Postmaster] has a loss of £4,000. He was
3   in the office until 11.00 [pm] last night and
4   could not find anything."
5 **A.** Yes.
6 **Q.** "Resolution":
7   "Went through all the balance checks with
8   [the postmaster]. He had checked the rems in
9   and out, his cash stock and the P&A ..."
10   Do you remember what the P&A was?
11 **A.** Pensions and allowances?
12 **Q.** "... and was unable to find the loss. Advised
13   I would pass through to suspense."
14   So would you understand, at this point, that
15   the postmaster had signed his cash account off
16   by saying that there was a discrepancy,
17   essentially, between the cash and stock, which
18   Horizon showed he should have, and the cash and
19   stock that he, in fact, had --
20 **A.** Yes.
21 **Q.** -- and that, the NBSC are saying, they are going
22   to pass through to the Suspense team, yes?
23 **A.** That's what they appear to be saying, yes.
24 **Q.** Yes. You said, I think, earlier that your
25   understanding was that the discrepancy, whether
<div align="center">84</div>

1   it was a gain or a loss, would be placed in
2   a suspense account?
3 A. That was a manual action that, if authorised, he
4   could take, or I think it could be taken -- it
5   could be done, even if not authorised, but my
6   recollection is that they were meant to get some
7   sort of authorisation.
8 Q. If a postmaster was placing an amount in the
9   suspense account -- or was authorised to place
10   an amount in the suspense account -- and was
11   signing off the cash account, was it your
12   understanding that he was acknowledging that he
13   owed the money shown on the cash account, if it
14   was a loss?
15 A. I had no idea of what the legal position might
16   be on that money.
17 Q. Or was it your understanding that, despite
18   signing the cash account, the money was, in
19   effect, disputed and that's why it was in the
20   suspense account?
21 A. Again, I don't know about the business and the
22   legal side of it. All I would see would -- if
23   I looked, was an amount being moved from one
24   place on the system to another.
25 Q. I mean, to be clear, Mrs Chambers, I'm not
                          85

1   asking you for what your understanding of the
2   legal position was because I can't imagine you
3   ever address your mind to it. It's more what
4   you thought was signified by an amount being
5   held in a suspense account and was it that sum
6   is disputed?
7 A. Um, I'm not even sure if I knew that at that
8   point but then, yes, there's a loss and they've
9   parked it there.
10 Q. What did you think was the status of money then
11   held in the suspense account or did you think
12   nothing about that?
13 A. I don't think I thought about it, just that it
14   had been sort of a sum had been parked there.
15 Q. Parked: did you have an understanding of parked
16   for what purpose or parked until what?
17 A. I don't think I really thought about it.
18 Q. Can we move forwards, then, to 28 January 2004
19   and turn to page 32. So we're back to the next
20   Wednesday, yes?
21 A. Mm-hm.
22 Q. The 28th, the third week, the third Wednesday.
23   I'm reading under "Detailed Description":
24   "[Postmaster] says since broadband installed
25   every time he receives stock into [the] office
                          86

1   he is showing short by same amount. Has checked
2   to make sure remmed in properly but still
3   showing £2,500 short amount of stock. Rem needs
4   CB to check if accounting or system [problem]."
5   Are you able to decode for us what that last
6   part means?
7 A. No.
8 Q. Do you know what "CB" referred to?
9 A. No.
10 Q. "Resolution":
11   "Advised [the postmaster] that if he feels
12   this is a technical problem to call [the Horizon
13   Helpdesk] but after talking to [the postmaster]
14   he is entering all [transactions] ok, so this
15   could be the case. Advised him to balance and
16   roll for a definite figure then to call [the
17   Horizon Helpdesk]. If no joy call TP."
18   Do you know what "TP" was a reference to?
19 A. It might have been the Transaction Processing
20   team but I'm not certain.
21 Q. What did the Transaction Processing team do?
22 A. I don't know. I'm --
23 Q. Were they part of Post Office or Fujitsu?
24 A. Post Office, I think. I mean, there was a daily
25   feed of figures at this point from Horizon to
                          87

1   a Post Office team via a system called TPS. And
2   so whether -- I'm not -- I really don't know but
3   it might have been a team inside Post Office who
4   were getting transaction data at some level sent
5   to them.
6 Q. But, again, is this the same as the previous
7   week, essentially the Post Office saying to the
8   subpostmaster "Let's not sort your problem out
9   now, do the end of week balance, fill out your
10   cash account tomorrow, see if there's still
11   an issue then"?
12 A. That appears to be what they are saying.
13 Q. Now, we've seen therefore here, in the NBSC
14   records, the postmaster was being told to call
15   the Horizon Helpdesk, the Fujitsu side of the
16   house, if there remained a problem. So can we
17   turn, then, to the Fujitsu side of the house to
18   see whether there's anything in the Fujitsu
19   records. Can we look, please, to FUJ00122322.
20   Are these a record of the PowerHelp calls?
21   You have to say something rather than nod your
22   head.
23 A. Sorry, yes. I didn't realise it was a question.
24 Q. Yes, it was: are these a record of the PowerHelp
25   calls?
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1   A.   Yes.
2   Q.   Is the answer to that yes? Okay. These are
3   things that you would have had access to when
4   you came to look at the problem on 26 February
5   2004 but none of the documents we've looked at
6   already?
7   A.   Yes.
8   Q.   Okay. We can see that the call was opened on
9   28 January at 11.13. Can you see that in the
10   middle?
11 A.   Yes.
12 Q.   It was closed eight minutes later on the same
13   day, at 11.21?
14 A.   Yes.
15 Q.   We can see that the caller on the left-hand side
16   is said to be "Liam", I think that's supposed to
17   be "Lee". If you look at the "Problem Text",
18   which is just over halfway down:
19   "Caller states that discrepancies are going
20   through on the system. And this has been the
21   case for 3 weeks in a row. Week 1: £1,103 down.
22   Week 2: £4,230.97 down. Week 3 (today):
23   [approximately] £2,500."
24   Can you see that?
25 A.   Yes, I can.

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1   Q.   "Transferred the caller to the NBSC so that the
2   incident could be investigated further."
3   Call closed, it's an NBSC issue,
4   transferred; can you see that?
5   A.   Yes, I can.
6   Q.   Was this something you came across frequently:
7   subpostmasters reporting losses or gains,
8   discrepancies, and being passed from one
9   organisation to the other with neither taking
10   responsibility?
11 A.   I wouldn't say frequently but, yes, it did
12   happen.
13 Q.   You told us, I think, on the last occasion that
14   you were concerned about people being bounced
15   from NBSC to the Helpdesk and back again?
16 A.   Yes.
17 Q.   And does this appear to be an early example of
18   it?
19 A.   Yes, it appears to be an example of it. Yeah.
20 Q.   He had reported, consistently, calls to the
21   NBSC; they'd not investigated them; they'd told
22   him to contact the Helpdesk at Fujitsu; he
23   contacts the Helpdesk at Fujitsu and they tell
24   him this has got to be thoroughly investigated
25   by the NBSC?

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1   Q.   Then all of that essentially matches what we've
2   seen in the NBSC logs, doesn't it, in terms of
3   the figures and the duration of the problematic
4   events?
5   A.   Yes.
6   Q.   Then if we go down, please, to the call activity
7   log. Thank you. The first line of text at
8   11.11:
9   "New call taken by Dane Meah: Caller states
10   that discrepancies are going through on the
11   system. And this has been the case for 3 weeks
12   in a row."
13   Then the three figures we've seen are set
14   out, yes?
15 A.   Yes.
16 Q.   "Caller states that these discrepancies have
17   been relevant to the level of stock currently
18   being held."
19 A.   Yes.
20 Q.   Then next:
21   "[Advised] caller that this problem will
22   need to be thoroughly investigated by NBSC
23   before the issue can be investigated as
24   a software problem."
25 A.   Yes.

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1   A.   Yes.
2   Q.   I think you can help us with this, you tell us
3   in your witness statement -- no need to turn it
4   up now -- the SSC wasn't involved at all at this
5   time because the HSH bounced it back to NBSC,
6   and had not created a PinICL or a PEAK?
7   A.   Yes.
8   Q.   Thank you. Can we move forwards to 29 January,
9   please, which is LCAS0000365, and page 33,
10   please.
11   So he's back with the NBSC now, yes.
12 A.   Yes.
13 Q.   The next day, on the 29th, "Cash account
14   discrepancy". Detailed description:
15   "Is showing a loss of £2,523.12. Says this
16   is the third discrepancy in as many weeks."
17   "Resolution":
18   "Checked through figures using transaction
19   log by mode and also amount looked at Rems
20   declaration and cash flow. No trace of the
21   discrepancy. Created call for Suspense Account
22   team."
23 A.   Yes.
24 Q.   So he's been to the NBSC three times. They've
25   said on the last occasion "Go to the HSH". He's

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1 gone to the HSH. They say "This needs to be
2 fully investigated by the NBSC". He's gone back
3 to the NBSC. They've said, "We'll create a call
4 for the putting of the money in the suspense
5 account".
6   Does that appear to be accurate?
7 A. That appears to be what they're doing, yes.
8 Q. So, on the face of it, this call isn't being
9 investigated by the NBSC, the money is just
10 being put, or potentially being put, in the
11 suspense account again?
12 A. Yes, the NBSC are trying to help him find out
13 what might be the cause of the discrepancy by
14 helping him use the transaction log and checking
15 the REM declarations but they're unable to
16 pinpoint anything there that might have caused
17 the discrepancy.
18 Q. Can we move forward to later on the same day,
19 I think, page 35, so still on the 29th.
20 "Detailed description":
21   "[Postmaster] would like to have his
22 transactional archives looked at more closely to
23 try to identify what is going wrong with his
24 office. He is having a lot of losses over the
25 last three weeks and thinks there is a system

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1 fault with his remittances."
2 A. Yes.
3 Q. "Resolution":
4   "I have followed KB instructions and sent
5 an email to Adele Kilcoyne so [postmaster] can
6 study his archives to try to identify what has
7 gone wrong. All details are in the log."
8 A. Yes.
9 Q. Is that a request that you would encounter often
10 in your many years working at Fujitsu,
11 subpostmasters wanting their/"transactional
12 archives" raked over?
13 A. This is an NBSC call log so I can't really
14 comment on that. I don't recall calls like that
15 coming through to SSC, in particular.
16 Q. You can't remember many calls or incidents
17 passed to the SSC, where the subpostmaster was
18 asking for, as it's recorded here, his
19 transactional archives looked at closely?
20 A. No, I don't recall receiving calls at SSC that
21 said that.
22 Q. Can we go back to the HSH, please, FUJ00122322,
23 and look at page 2, please. Still on the same
24 day -- sorry, page 2, thank you -- 29 January
25 2004. You can see call opened 10.26 and 10.31.

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1 I should make it clear I'm not completely clear
2 as to the precise order of the last two
3 documents and this one. These are timed; the
4 other ones are not.
5   But, in any event, this is a record of
6 a call made the same day and we can see that it
7 lasted or the log was open for five minutes.
8 The caller on the left-hand side is recorded,
9 correctly this time, as Lee, the postmaster and
10 we can see the "Problem Text", a third of the
11 way down the page:
12   "[Postmaster] reports [I think 'he'] is
13 having problems on his system connected to rems.
14 Every time he rems in it leaves him with
15 a discrepancy and he has been to the NBSC and
16 back to us now and wants his system
17 investigating."
18   Then down to the "Call Activity Log":
19   "New call taken by Mary Rainbow:
20 [postmaster] reports he is having problems on
21 his system connected to rems, every time he rems
22 it in leaves him with the a discrepancy and he
23 been to the NBSC and back to us and now wants
24 his system investigating.
25   "Advice: advised the [postmaster] for this

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1 to happen he needs to be re-referred from the
2 NBSC.
3   "Caller referred to the NBSC.
4   "Call [closed]."
5   Again, is that another example of what you
6 told us about last time, postmasters being
7 bounced between the two organisations?
8 A. Yes.
9 Q. Then lastly before lunch, can we look, please,
10 at page 3 of this document, moving forward to
11 13 February, which is a Friday. Caller,
12 Lee Castleton. "Problem":
13   "Marie @ NBSC -- [postmaster advised] his
14 system is doubling up cash declarations and
15 cutting off cheques. They still appear the next
16 day."
17   Then "Call Activity Log":
18   "New call taken by Tony Law: Marie @ the
19 NBSC -- [postmaster advised] his system is
20 doubling up cash declarations and cutting off
21 cheques. They still appear the next day.
22   "NBSC [advise] they have: checked that he is
23 cutting everything off properly."
24   Just stopping there, what do you understand
25 "cutting off" to mean in the context of cheques?

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1 A. At the end of each day, they have to print off
2   a report of cheques. They are then -- the
3   cheques had to be posted off somewhere, I think,
4   with the report or a copy of the report as well,
5   and then there was a button that they had to
6   press on the system to say, "I've done that",
7   and that effectively sort of drew a line under
8   that set of cheques so that they wouldn't appear
9   on the next day's report.
10 Q. Thank you. So:
11   "NBSC [advise] they have: checked that he is
12   cutting everything off properly, cash figures
13   are being done properly.
14   "[Postmaster] has insisted on a system
15   check."
16   Skipping a line:
17   "Problem has been happening for 5 weeks.
18   "Every time stock has been remmed in they
19   have had a loss that night.
20   "Snapshots and [transaction] logs agree with
21   [the postmaster's] figures."
22   What would you understand that to mean:
23   snapshots and transaction logs agree with the
24   postmaster's figures?
25 A. Not entirely clear. I mean, a balance snapshot

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1   was a report that they could print to get
2   a picture of the current system figures. But
3   I don't know precisely what that sentence is
4   meant to mean.
5 Q. "[Postmaster advised] NBSC have done:
6   [transaction] logs, Girobank logs,
7   reconciliations, rems in/out, stock holding.
8   "[Postmaster advised] there is a Sunday decs
9   but no one is on site to do this on a Sunday.
10   "5 weeks ago [postmaster advised] he did not
11   rem in any stock last week and balanced
12   perfectly. Every week that he does rem stock
13   in, the balance is wrong.
14   "Escalated to Heather Dryden.
15   "[Postmaster] states on the cheques listing
16   for the 11th it states all of cheques for the
17   10th as well. When I got him to go through his
18   cheques, [postmaster] stated that this happened
19   more than once but when going through his
20   cheques it had actually happened just the once.
21   [Postmaster] stated he was sure he cut off, so
22   advised I would log all details and call back if
23   it happens again.
24   "Call [closed]. [Postmaster] states his
25   cheques keep carrying over from the day before.

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1   Advised [the postmaster] to call back if it
2   happens again ..."
3   Yes?
4 A. Yes.
5 Q. So we see that, in the course of this call, it's
6   recorded that the postmaster insisted on
7   a system check. That wasn't actioned at the
8   time, was it?
9 A. No, it appears that they followed up on the
10   specific thing -- problem with the cheques
11   listing and -- which I think they did actually
12   deal with correctly but they didn't then go back
13   to all the other issues that he was also
14   reporting.
15 Q. They didn't go back to those?
16 A. No. They only dealt with the cheques listing,
17   part of what -- the problems that he was having.
18 Q. They dealt with that by saying, "Let's see
19   whether it happens again"?
20 A. No, they -- I think that probably what they did
21   was get him to look at the events -- the log of
22   Riposte events, which he could look at on his
23   own system, which showed whether a report had
24   been cut off on a particular day. And, I mean,
25   I know from having looked at that same data

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1   subsequently, that, yes, there was a day where,
2   although he was under the impression that he had
3   done a cut-off, it had not been done and that
4   explained why the cheques listing on the 11th
5   included the cheques from the 10th as well.
6 Q. You tell us in your witness statement that
7   a failure to cut off cheques wouldn't be
8   connected to the cash discrepancy issue?
9 A. No. It has no impact on the cash.
10 Q. Can you explain why, please?
11 A. Because this -- the cut-off just affected what
12   showed on the cheques report each day. As long
13   as they'd remmed out the cheques correctly,
14   which they had done, that meant that the value
15   of the cheques had been removed from the system,
16   as it should be. Cheques also didn't directly
17   affect discrepancies because a discrepancy is
18   a difference in the cash totals.
19 MR BEER: Thank you very much.
20   Sir, that would be a convenient moment
21   before we move to 25 February 2004. I wonder
22   whether we can break until 2.05.
23 SIR WYN WILLIAMS: Certainly. Yeah.
24 MR BEER: Thank you very much.
25 (1.04 pm)

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1   (The Short Adjournment)
2   (2.05 pm)
3   **MR BEER:**   Good afternoon, sir. Can you see and hear
4   me?
5   **SIR WYN WILLIAMS:**   Yes, I can, thank you.
6   **MR BEER:**   Thank you very much.
7   Good afternoon, Mrs Chambers. We had dealt
8   with calls in January and the early part of
9   February. We'd finished on 13 February. Can we
10   turn to another Wednesday for Mr Castleton,
11   Wednesday, 25 February 2004. It's FUJ00122322,
12   and to page 8, please.
13   So this is, is this right, a PowerHelp call
14   record for 25 February 2004?
15   **A.**   Yes.
16   **Q.**   We can see it was open for half an hour.
17   **A.**   Yes.
18   **Q.**   We can see that this time the caller was
19   Christine --
20   **A.**   Yeah.
21   **Q.**   -- who I think was one of the clerks or a clerk
22   at Mr Castleton's branch. We can see the
23   problem stated under "Problem Text":
24   "Clerk reports that they have been having
25   problems on the system when balancing that seems

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1   snapshot on Monday and all looked okay but since
2   then they have remmed in some stock which
3   appears to have given them a loss.
4   "Advised the clerk that she will need to
5   check her stock position for last week and then
6   check her rems in summary, this should give her
7   the stock she should be holding. This figure
8   can then be compared with the stock showing in
9   adjust stock and this will highlight any
10   problems with stock on hand.
11   "Clerk reports they were told that checks
12   would be made on the system but she is unsure if
13   this information came from NBSC or HSH as she
14   has no names or [reference] numbers.
15   "Advised the clerk that we need her to take
16   the unit to trial balance this evening and come
17   back before she rolls over so we can take down
18   any detail she can give us.
19   "Clerk reports they usually report the
20   balance at about [5.30 pm] or maybe before.
21   "Spoke to Matt Saunders and he suggests call
22   should be passed to someone line, Heather Dryden
23   [that's presumably 'someone like Heather
24   Dryden'], if clerk does call back wanting
25   further assistance.

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1   to be related to stock remmed in through the
2   week."
3   If we scroll down, please, to "Call Activity
4   Log":
5   "New call taken by Mary Rainbow ..."
6   So we're back with Mary Rainbow again:
7   "... clerk reports they have been having
8   problems on the system when balancing that seems
9   to be related to stock remmed in through the
10   week.
11   "Clerk reports that over the last seven
12   weeks they have had losses every week, at one
13   point they had a problem with cash on hand but
14   they was found to be an issue with ID numbers
15   and has been resolved."
16   **A.**   Yes.
17   **Q.**   "Clerk reports that last week when they rolled
18   over they put a loss into suspense account and
19   then took the unit back to trial balance and
20   came out with a zero net discrepancy to start
21   the new CAP ..."
22   Is that cash accounting period?
23   **A.**   Yes.
24   **Q.**   "... with.
25   "Clerk reports that she printed a balanced

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1   "The clerk reports they are working in
2   a shared AA stock unit.
3   "Clerk to call back tonight if further
4   assistance required.
5   "Clerk to call back if further assistance
6   required. Call [reference] taken.
7   "Call [closed]: clerk reports problems with
8   the balance that appear to be linked to stock
9   remmed in -- clerk will call back tonight if
10   further assistance required."
11   Can we then look to later that day, please,
12   page 10. So later on the 25th, we're now at
13   12.03 pm on the same day. I think this is the
14   NBSC calling the HSH; is that right?
15   **A.**   It looks like it, yes.
16   **Q.**   Looking at the "Call Activity Log":
17   "New call taken by Robert Congerton: NBSC --
18   [postmaster] has called the NBSC regarding
19   problems with her balance.
20   "[Postmaster] called in at 11.03 today
21   regarding problems with her balance. Advised
22   NBSC that the agent advised the [postmaster] to
23   call back in tonight when they have a net
24   discrepancy on the cash account.
25   "Call [closed]."

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1   Yes?
2 A. Yes.
3 Q. So then can we turn to page 14, please. This is
4   still the same day, when the call is opened,
5   Wednesday, 25 February at 5.33 pm. Again, can
6   we read the call activity:
7   "New call taken by Kuljinder Bhachu:
8   [postmaster] reporting they are getting large
9   discrepancies for the last few weeks.
10   "Looking at closed calls for this site,
11   there have been a number of calls logged
12   regarding discrepancies. NBSC have been in
13   contact with the [postmaster] and cannot find
14   any user error."
15   Just stopping there, do you know what NBSC
16   used to do in order to determine whether or not
17   a discrepancy reported had, as its cause, user
18   error?
19 A. As I said earlier, getting the postmaster to
20   check the transaction logs against any other
21   records that he had in the Post Office.
22 Q. "Spoke to Sandra @ NBSC ... regarding this
23   issue. Checked Tivoli events and health
24   checked. Site is health checking ok."
25   Can you help us with what a "health check"
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1 Q. "NBSC have said there is no user error. Thank
2   you."
3   Is this, therefore, the event which
4   generates the PinICL which triggers your
5   involvement?
6 A. Sorry, yes, you're not talking about a system
7   event; you're talking about the call being
8   handed -- passed over to SSC, yes.
9 Q. Yes, so the request for SSC involvement we see
10   at 18.14:
11   "Could SSC please investigate why this [post
12   office] is experiencing large discrepancies ever
13   since the BT engineer has moved the BT box ..."
14 A. Yes.
15 Q. Is that the task that you subsequently
16   undertook, investigating all of the
17   discrepancies that had been reported since the
18   BT engineer had moved the BT box?
19 A. I can't remember what the date was when the BT
20   engineer did move the box.
21 Q. It's described here as "seven weeks ago".
22 A. Okay, I --
23 Q. I don't think you did conduct --
24 A. No, I --
25 Q. -- such a broad investigation?
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1   was?
2 A. That the comms were all working okay, no sign of
3   any comms problems.
4 Q. "Critical event seen ... on 18 February 2004
5   ..."
6   A KEL reference is given. I'm going to
7   ignore the rest of it, until we pick up at
8   18.09:
9   "Spoke to [postmaster], who advises that the
10   problem with the [Cash Account] started ever
11   since the BT engineer came to move the BT box
12   for the preparation of ADSL [as it's called]."
13 A. Yes.
14 Q. "Username ... other balance users ... balance on
15   Wednesday after 5.30."
16   Then this:
17   "Could SSC please investigate why this [post
18   office] is experiencing large discrepancies ever
19   since BT engineer has moved box in preparation
20   for ADSL [installation]. KEL [reference] given
21   as possible problem."
22   You're later -- taking matters shortly, to
23   say that KEL reference was to do with something
24   else completely; is that right?
25 A. Yes, as I recall, yeah.
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1 A. No, I concentrated mostly on the last couple of
2   weeks, which was when I had most of the evidence
3   for.
4 Q. Given that this was the request, "Could SSC
5   please investigate why this [post office] is
6   experiencing large discrepancies ever since the
7   BT engineer had moved the box", why did you look
8   only at the last couple of weeks?
9 A. Because that was the data that was most readily
10   available and I think I assumed that, if there
11   was a problem, an ongoing problem, then I would
12   find evidence of it most easily in the most
13   recent weeks.
14 Q. What about if there was more than one problem?
15 A. Gosh, um --
16 Q. A problem or problems in the earlier weeks,
17   different from any problem in the later weeks?
18 A. Yes, it's possible, then, if there was a problem
19   in the -- a different problem in the earlier
20   weeks, that my investigations might not have
21   found it. I -- obviously, even 18 months beyond
22   this, I couldn't remember precisely what my
23   investigation was. I knew I had very thoroughly
24   investigated a week or two --
25 Q. My question is: why did you investigate only
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1   a week or two?
2 A. As I said, because I felt that, if there was
3   an ongoing underlying cause, then I would find
4   that most readily in the most recent week.
5 Q. Would you not take this as your terms of
6   reference or your instruction, the request that
7   essentially dates back to when the first problem
8   was reported back on 14 January 2004?
9 A. I don't think I would necessarily have done
10   this. I was just doing a general investigation
11   to see if I could find the cause for the
12   discrepancies.
13 Q. But only the recent discrepancies?
14 A. That was my starting point, yes.
15 Q. Well, it was your ending point too, wasn't it?
16 A. Yes, it was my -- yes, given that I now cannot
17   remember precisely what I did over which stage
18   but, yes, if there'd been -- I probably did not
19   investigate thoroughly back towards the
20   beginning of January.
21 Q. Can we turn, please, to the PinICL, please,
22   which is essentially your originating
23   document --
24 A. Yes.
25 Q. -- would that be fair?

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1 A. Yes.
2 Q. That's FUJ00146165. In fact, it's a PEAK, not
3   a PinICL. We can see the PEAK number,
4   PC0099954, and we can see it was opened on the
5   day we've just referred to, 25 February 2004, at
6   6.19 pm; can you see that?
7 A. Yes.
8 Q. I think if we look at page 2, we can see that it
9   was assigned to you at 9.41. Can you see that
10   just below halfway down --
11 A. Yes.
12 Q. -- and that's the following day --
13 A. Yes.
14 Q. -- 26 February --
15 A. Yeah.
16 Q. -- at 9.41?
17 A. Yes.
18 Q. Does that mean that you get it then or does it
19   just mean that it has been assigned and you
20   don't receive anything until you log on to
21   a system?
22 A. When I next looked at my PinICL stack, I would
23   have seen it but I don't know -- that wasn't
24   necessarily at 9.41.
25 Q. I think we can see that you had looked at your

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1   stack by at least 10.17 --
2 A. Yes.
3 Q. -- because you make an entry at 10.17, right at
4   the foot of the page --
5 A. Yes.
6 Q. -- when you changed the description in the call
7   summary box?
8 A. Yes.
9 Q. I think others may ask you about that. So this
10   is the first record we see of you doing any work
11   on this event, yes?
12 A. Yes.
13 Q. Can we go back to page 1, please. What on this
14   page do you see when you open up this PEAK?
15 A. Just that they're reporting large discrepancies.
16   It says there's been a number of calls logged.
17 Q. Just stopping there, it says:
18   "[Postmaster] reporting that they are
19   getting large discrepancies for the last few
20   weeks."
21   That's not really accurate, is it, on the
22   basis of what we've seen?
23 A. Is that not accurate?
24 Q. Didn't it go back to 14 January?
25 A. Well, I'd have said that the last few weeks from

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1   the 25 February probably does just about include
2   14 January.
3 Q. Was that phrase "last few weeks" what
4   conditioned your investigation to any look at
5   data for a week or two?
6 A. I don't think so. I think I then did look at
7   the closed calls and so then I did get the
8   picture and I could see that, yes, they had been
9   reporting problems since -- was it 14 January --
10   when they had the £1,100 loss.
11 Q. Where would you have seen that they had been
12   reporting calls since 14 January from?
13 A. Was that not on the PowerHelp calls?
14 Q. Can you look, please, at FUJ00122322. The first
15   PowerHelp call is on 28 January --
16 A. Yeah.
17 Q. -- and it's only in the NBSC call log that one
18   sees the records for 14 and 21 January --
19 A. But this --
20 Q. I'm so sorry, you'll see in the "Problem Text"
21   that it's recorded that it's been the case for
22   three weeks in a row?
23 A. Yes.
24 Q. Are you saying that you read this and realised
25   that the 28th wasn't the first report, it had

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1   been going on for three weeks beforehand?
2 A. Yes, I think so. I mean, I read that now and
3   that's what I read, and I think I would have
4   seen that at the time.
5 Q. Yes. So why wouldn't you investigate the three
6   weeks beforehand?
7 A. Because the message store data would not have
8   gone back to 14 January.
9 Q. How far back would it have gone, when you were
10   looking at 26 February?
11 A. I'm hesitating because --
12 Q. We've heard different dates in the Inquiry, so
13   I'm not going to suggest how long the message
14   store was retained for?
15 A. At one point, messages were kept for 42 days and
16   then that was reduced and they were then kept
17   for only around 35 days, I think it was. But
18   I can't remember when that change came in.
19 Q. We've heard both of those dates. Thank you. So
20   was it that you thought that, if there was
21   a system problem, it would be disclosed by
22   investigating recent weeks, that you limited
23   your investigation to recent weeks or was it
24   because the data wasn't available on the message
25   store?

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1 A. I think, primarily, it was because I thought,
2   you know, if there was an ongoing problem
3   I would find the evidence for it in the recent
4   weeks and that was the obvious place to start
5   looking.
6 Q. Can we go back, please, to FUJ00146165, which is
7   the PEAK?
8 A. Yes.
9 Q. So you can see all of this data on the first
10   page, ie every entry that's made before you look
11   at 10.17 the following day?
12 A. Yes.
13 Q. Would your practice have been to read what's
14   here or were there certain bits that you know to
15   go to, without reading it line by line?
16 A. I certainly would have glanced over it.
17   I probably would have gone back and looked at
18   all the PowerHelp calls, as well, in case there
19   was more information on those that, for some
20   reason, wasn't on the PEAK. Certainly the PEAK
21   would only contain the information from the
22   latest, that -- the PowerHelp call on which this
23   was based. But I would have gone and looked at
24   everything on PowerHelp.
25 Q. Do you see anything else automatically, whether

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1   by sort of hyperlink or other electronic
2   connection, when you open up the PEAK, or do you
3   have to go and find it yourself?
4 A. I have to go and find it myself.
5 Q. I think you tell us that, first off, you looked
6   for other PEAKs or PinICLs and you tell us in
7   paragraph 29 of your statement that there were
8   none?
9 A. Yes.
10 Q. That, would you agree, would be because none had
11   been raised because Mr Castleton had been passed
12   backwards forwards between NBSC and HSH a number
13   of times and nobody had referred the matter to
14   the SSC?
15 A. Yes, but I went looking for other PEAKs purely
16   because of that. I'd have seen that from the
17   PowerHelp calls anyway. I was also looking in
18   case there were any reconciliation calls or
19   system event type calls, for which PEAKs had
20   been raised, which I might not have found so
21   readily on PowerHelp.
22 Q. How would you search PinICLs or PEAKs, by
23   reference to the FAD code?
24 A. The FAD code, yes.
25 Q. So you're looking whether there's anything

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1   branch specific?
2 A. Yeah.
3 Q. You tell us in your witness statement, there's
4   no need to turn it up, it's paragraph 30, that
5   you checked whether the branch appeared in any
6   reconciliation reports?
7 A. Yes.
8 Q. Can you explain what reconciliation reports are,
9   please?
10 A. There was a whole suite of checks that were made
11   comparing, for example, totals from the
12   counters, for the transactions each day, with
13   the totals that were -- had reached the data
14   centre to make sure nothing had got lost being
15   moved from when it was replicated from one to
16   the other. Yeah, there was a large suite of
17   checks.
18   Also, the cash account was recalculated at
19   the data centre, based on the copy of the
20   transactions there, and compared with the cash
21   account that had actually been produced at the
22   branch. So this was just checking the integrity
23   of the data, if you like.
24 Q. For what period did you check the reconciliation
25   reports?

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1 A. I believe those reports were only kept for two
2   weeks. That's what I said, I think, back in
3   2006, when I probably knew, and so I just would
4   have checked all the reports as far as back as
5   they existed.
6 Q. Can we look, please, at LCAS0000112. This is
7   your witness statement in the proceedings. As
8   you say, it's dated 14 September 2006. Can we
9   look at the second page and look at paragraph 7
10   at the bottom. You say:
11   "On 26 February, I also checked for any
12   central reconciliation report entries for the
13   branch for the [past] 2 weeks which might
14   indicate a system problem."
15   So that's the two-week period?
16 A. Yeah.
17 Q. You don't say there "They were the only ones
18   that are available to me".
19 A. No, I didn't say that then.
20 Q. Were they the only ones available to you or did
21   you frame the request, namely only to look back
22   a couple of weeks?
23 A. No, I mean, the way I checked was just to look
24   for all occurrences of the FAD code in any files
25   in the folder that held the reconciliation
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1   messages for the branch.
2 Q. If there were errors or discrepancies in the
3   compilation of these reports, would you have any
4   means of checking that that was so?
5 A. I mean, I think if there were errors on one side
6   or the other, then we would be seeing a lot
7   of -- you'd get a lot more entries on the
8   reconciliation reports because, otherwise, it --
9   it seems pretty unlikely that you would get the
10   same Riposte error happening on a counter and at
11   the data centre at the same time, if -- and if
12   you had it -- had an error on one side but not
13   on the other then the figures wouldn't match and
14   you'll get an entry on the reconciliation
15   reports to be investigated.
16   And I've -- I think, very occasionally,
17   there were entries that were due to some sort of
18   inconsistency in calculation rather than
19   anything else but they were all investigated, as
20   were any reconciliation report entries.
21 Q. You tell to in your witness statement, and this
22   is paragraph on page 9 -- no need to turn it
23   up -- you looked at the HSH raised calls for the
24   branch on the PowerHelp system as you've
25   described?
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1   reports. So I checked everything that was
2   available at that time.
3 Q. Were those reports automatically generated by
4   the system?
5 A. Yes.
6 Q. That can come down, thank you.
7   Which part of the system were they
8   automatically generated by?
9 A. There was -- part of the overnight processing at
10   the data centre produced the -- well, compared
11   the sets of figures that it received from
12   various sources.
13 Q. Did they rely on Riposte as part of the process
14   for the compilation?
15 A. Only in so much the data that was aggregated for
16   the totals to be compared had to be -- I mean,
17   Riposte was the mechanism which read the message
18   store. So -- sorry, I'm trying to think about
19   this.
20   So yes, I mean, on the counters, the figures
21   that were used for comparison, there must have
22   been some sort of Riposte query, saying "Add up
23   this data", out of the message store. And then
24   I presume at the data centre it was also using
25   Riposte to access the data centre to access the
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1 A. Yes.
2 Q. We've seen those already. They go back to
3   28 January and the NBSC call log goes back
4   further than that?
5 A. Yes.
6 Q. But there's a reference on that first page to
7   three weeks that the problem has been occurring
8   for, yes --
9 A. Yeah.
10 Q. -- with the amounts written down --
11 A. Yes.
12 Q. -- on each of those three weeks?
13 A. Yes.
14 Q. I don't think you investigated those historic
15   balance discrepancies, did you?
16 A. At that point no, I probably didn't.
17 Q. In paragraph 34 of your witness statement --
18   I wonder whether we could turn that up, please,
19   WITN00170200, page 11, please. Paragraph 34,
20   which is at the foot of the page, you say:
21   "As well as examining the message store
22   using a text file viewer, I probably extracted
23   all the transaction messages into a spreadsheet
24   so they could be more easily examined.
25   I certainly did this for the cash lines
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1   (product 1). I cannot remember whether this was
2   for a week or longer, nor which week(s)
3   I checked."
4 **A.** Yes.
5 **Q.** Now, of course, when you were doing this you
6   didn't realise that you would be called to give
7   evidence about what you had done?
8 **A.** Yes.
9 **Q.** Is that fair?
10 **A.** Yes, that's fair.
11 **Q.** So you didn't keep a record of the work that you
12   had undertaken?
13 **A.** No, I --
14 **Q.** At the end of the process, you summarised it in
15   an entry in the PEAK?
16 **A.** Yes, I would have kept the spreadsheet and the
17   message store in my own file store for some time
18   afterwards but I didn't still have it in 2006.
19 **Q.** So when it came 18 months later to make the
20   witness statement -- in fact, it's longer than
21   18 months later, it's two and a half years
22   later -- you didn't have your workings out
23   available to you?
24 **A.** No.
25 **Q.** If you'd known that you were going to be

1   a witness, whether a witness of fact or
2   an expert witness, would you have kept them?
3 **A.** Yes, I would have done. I could have attached
4   them to the PEAK, which would have been a safe
5   place to keep them, but we tended only to put
6   data on PEAK for calls that were then going to
7   be passed on to Development or whatever.
8 **Q.** Again, you say that you can't remember whether
9   you did this, ie extracting messages into the
10   spreadsheet from the message store, for a week
11   or longer. Why wouldn't it be for all of the
12   period, given that the concerns had been raised
13   a month and a half previously?
14 **A.** Yes, it might have been. I can't remember.
15   I know I -- I didn't want to say that I had done
16   more than I had done, when I couldn't truly
17   remember what I'd done or not. I know,
18   I absolutely certainly did it for a week. It
19   could well have been longer than a week but
20   I can't remember.
21 **Q.** If you had a problem revealed on the PEAK to be
22   of seven weeks' duration, wouldn't the natural
23   thing to do, if the data was available, to
24   examine the available data for that seven-week
25   period?

1 **A.** Yes, it would seem to be so, and I may have done
2   it but I cannot swear that I did do it.
3 **Q.** Again, the two weeks of reconciliation reports
4   you looked at, that was a limiting factor only
5   because they were the only reconciliation
6   reports available?
7 **A.** I checked all the reconciliation reports that
8   were available, yes.
9 **Q.** That two-week period wasn't the governing period
10   for the entirety of your investigation?
11 **A.** No.
12 **Q.** How much time did you take undertaking the
13   investigation?
14 **A.** Well, I'm aware I closed it before the end of
15   that day, so it was a few hours' work.
16 **Q.** If we look at FUJ00146165, second page, please.
17   If we scroll down to 10.17, we can see your
18   entry at 10.17. So you're certainly aware of
19   this PEAK by the time of that entry?
20 **A.** Yes.
21 **Q.** If we look at the bottom of the page, please.
22   We can see your entry of 3.16 pm that day --
23 **A.** Yes.
24 **Q.** -- which is your last entry, essentially?
25 **A.** Yes.

1 **Q.** Would you have spent the five or so hours
2   between those two times only on this or would
3   you have been looking at PEAKs and other issues
4   too?
5 **A.** I was probably only looking at this.
6 **Q.** You said a couple of hours earlier, it looks
7   like it's about five hours?
8 **A.** Yes.
9 **Q.** Can we turn, please, to your witness statement,
10   WITN00170200, and look at page 4, please, and
11   paragraph 13. You say here that a call -- this
12   not one we've looked at, and you give the
13   number:
14   "... was not obviously referring to
15   discrepancies. It was logged when Mr Castleton
16   found the message 'Desktop intialisation failed'
17   on the counter 2 screen on the Monday morning.
18   Attempts to clear the problem by rebooting, and
19   by deleting the training message store, were not
20   successful so an engineer was sent to replace
21   the base unit with a new one. As part of the
22   standard base unit replacement process, a zipped
23   copy of the previous night's message store was
24   copied from counter 1 to the new counter 2, then
25   all subsequent messages were replicated across.

1   This is completed at around 2.20 pm and then
2   LCA001 was able to log on to counter 2. It was
3   not possible to carry out transactions on
4   counter 2 before then, (though see below)."
5   This issue you're talking about here, the
6   installation of the new base unit, was this part
7   of your investigation at the time, ie on
8   26 February 2004?
9 A. I don't recall that I did look closely at this
10   at that time.
11 Q. So this is something that you're telling us
12   now --
13 A. I -- yes.
14 Q. -- by looking at documents now --
15 A. Yes.
16 Q. -- rather than something you did back in 2004?
17 A. Yes, I looked at it, of course, in 2006 and I've
18   looked at it again now.
19 Q. These messages that you're talking about here
20   are dated 1 and 2 February 2004. Was the reason
21   that you didn't look back at those at the time
22   that they were outside the date range that you
23   were looking at?
24 A. No, I think it was because it wasn't relevant to
25   discrepancies, rather than that it was outside

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1   the date range.
2 Q. So you would have looked at them and seen that
3   they -- that there was this issue about the
4   installation of a new base unit?
5 A. Sorry, when you say "them", what do you mean?
6 Q. Messages from Mr Castleton about the
7   installation of a new base unit?
8 A. No, that was a message that was displayed on his
9   computer --
10 Q. Screen?
11 A. -- screen, that he saw, and so that was when he
12   logged a call about it with the Helpdesk, he
13   said that was what he reported was showing on
14   the screen.
15 Q. So why were you, when you looked at these
16   messages, content that they could have had no
17   impact on discrepancies when Mr Castleton was
18   saying it's since the installation of this new
19   base unit that the problem has occurred?
20 A. I'm not sure he was. He was saying it was from
21   the installation BT box? That message that he
22   saw on the screen meant that the computer was
23   not working at all, which is why it had to be
24   replaced. If it's not working, you can't be
25   doing transactions on it. I'm sorry, I'm not

                           126

1   quite sure where we're trying to go.
2 Q. If we carry on in your witness statement,
3   please, at 14, you say:
4   "Looking at the ... event messages, there
5   are none written on counter 2 between 1 February
6   and 2.24 pm on 2 February. All counters at the
7   branch regularly exchange handshake messages to
8   check they are all up and running; counter 1
9   realised it could not communicate with counter 2
10   and so wrote an event (and also displayed
11   a message to the user) that it was disconnected
12   from the network. I think the message that it
13   was disconnected is slightly confusing; the
14   network was ok (and counter 1 was in
15   communication with the data centre and could do
16   online banking transactions) but counter 2 was
17   effectively dead."
18   What do you mean by the messages produced
19   by, I think, Riposte were slightly confusing?
20 A. Because -- I put this section in because I was
21   questioned about it in 2006 and it was obviously
22   an area of concern to Mr Castleton and, because
23   I hadn't really covered this in my 2004
24   investigation, I thought it was worth trying to
25   spell out here what I can now see. So to go

                           127

1   back a bit, the -- there was an event that was
2   included in the ARQ event data that said node 1
3   is completely disconnected from the network, and
4   I think Mr Castleton asked me questions about
5   this in 2006 but, in fact, yes, the -- this
6   message was being produced on counter 1 because
7   it couldn't communicate with counter 2, and that
8   was because counter 2 had failed and was being
9   replaced.
10 Q. Can we look, please, at EXPG0000001 and turn to
11   page 174, please. You can see this has just
12   extracted into an expert report that the Inquiry
13   has received a KEL. Can you see it was raised
14   back in 1999 and updated in 2004?
15 A. Yes.
16 Q. The symptoms are:
17   "Riposte error demodify operation failed."
18   Is that I/O or L/O?
19 A. I/O.
20 Q. What is the "I/O completion weight operation"?
21 A. I assume I/O is input/output but this isn't
22   something I have any memory or knowledge of.
23 Q. Then some code is given:
24   "... error occurred within the cache
25   manager. The I/O completion wait operation

                           128

1   timed out ... The message server will be shut
2   down abnormally."
3   Then "Solution":
4   "Reboot counter. If message appears then
5   send engineer. If a single counter outlet
6   engineer is to replace the mirror disk first and
7   if the message reappears to then replace the
8   base unit ... the base unit is replaced ...
9   Contact the SMC to synchronise the message
10   stores ... See [another KEL] for further details
11   ... On a multi-counter outlet, replace the base
12   unit."
13 A. Yes.
14 Q. Is this KEL essentially explaining that, after
15   hardware replacement, engineers need to make
16   sure that they synchronise machines so that
17   transactions are not lost?
18 A. That's a single counter office.
19 Q. I'm sorry?
20 A. It's -- yes, so it's hard to read because you
21   haven't got it formatted -- it's not formatted
22   very well but it's "If a single counter office",
23   which is SCO, "the engineer must contact the SSC
24   to synchronise the message stores".
25   So the synchronisation is vital if replacing
                              129

1   the base unit at a single counter office.
2 Q. Do you recall discussing this issue in the
3   run-up to Mr Castleton's trial?
4 A. No, I don't, and he had a multi-counter outlet
5   anyway.
6 Q. Let's look at what was discussed, then.
7 A. I mean, this precise error isn't the error that
8   he was getting anyway. So ...
9 Q. I see. This is a different --
10 A. This is a different, the probable disk problems
11   is the underlying problem but it was for a very
12   specific Riposte error, which was not seen at
13   Marine Drive.
14 Q. Got it. Let's look at the discussion that did
15   take place before the trial, then. POL00071165.
16   Can you see this is an attendance note of
17   a meeting at which you and a number of other
18   Fujitsu and Post Office witnesses were all
19   present?
20 A. Yes.
21 Q. Can you see that --
22 A. Yes.
23 Q. -- dated 6 June 2006?
24 A. Yes.
25 Q. Some solicitors from Bond Pearce, a solicitor
                              130

1   from Hugh James, Brian Pinder, Peter Sewell,
2   Andy -- I think that's Dunks --
3 A. Yes.
4 Q. -- D-U-N-K-S, rather than "Dunce" --
5 A. Yes.
6 Q. -- Anne Chambers, Naomi Ellis, Gareth Jenkins --
7 A. Yes.
8 Q. -- a "distinguished engineer of Fujitsu" --
9 A. Yes.
10 Q. -- Gareth Ward of the Post Office, yes?
11 A. Yes, it was actually Naomi Elliott, who was my
12   manager's manager.
13 Q. Can we turn to page 6, please. Can we look at
14   the third main paragraph down:
15   "At approximately 3.30 am the PCs do
16   a refresh and occasionally you get glitches in
17   the system and this sometimes causes an
18   initialisation failure. An operational
19   integrity violation points to a refresh not
20   starting up properly. An engineer was sent out
21   to sort the base unit and node. It is worth
22   noting that all messages will be copied from the
23   other node. Potentially could lose some
24   information if the two PC nodes were not
25   communicating at the point of breakdown. There
                              131

1   is nothing to suggest there was a problem at the
2   end of the previous day. This can be checked by
3   looking at the end of day marker to 1 February."
4   Then "AC". I think, in that context, that
5   must mean you?
6 A. It must.
7 Q. "AC stated that if it is a problem can
8   forensically check the old hard drive but you
9   would need the postmaster to be aware of
10   transactions having been lost."
11   If this had occurred, would it be shown on
12   standard, filtered ARQ data?
13 A. If the transactions were lost, then they
14   wouldn't have got anywhere to be audited.
15 Q. So if the postmaster was not aware at the time,
16   and the synchronisation didn't work, the
17   transactions could be permanently lost?
18 A. Possibly, yes, but you can tell from the ARQ
19   data whether the synchronisation was working.
20   You can certainly tell from the underlying
21   audited messages where the synchronisation was
22   working.
23 Q. What about from the standard, filtered ARQ data?
24 A. You could certainly see whether somebody had
25   logged out, for example, at the end of the
                              132

1 previous day, which would sort of imply a clear
2 closedown. But -- sorry, I'm just trying to
3 remember. I think it would be hard to tell
4 100 per cent from the ARQ data whether this had
5 happened or not.
6 Q. Were, at this time, the hard drives in the Post
7 Office estate known to be subject of high
8 failure rates?
9 A. I'm not sure about high failure rates but, yes,
10 there certainly were problems.
11 Q. Was it regarded as a significant issue?
12 A. I don't know if it was or not.
13 Q. Was it talked about within the SSC, the number
14 of hard drive failure rates?
15 A. Not that I recall. There --
16 Q. I'm sorry?
17 A. Yes, I was just going to say there were also
18 times when base units were replaced when, in
19 fact, it might have been possible to sort out
20 the problem in some other way, but it was
21 actually the quickest way to get a -- if, for
22 some reason, a counter was unable to restart and
23 run Riposte, it was actually quicker to get them
24 up and running again by sending an engineer out
25 to exchange the base unit, rather than by

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1 digging down as much as you could potentially
2 have done into, you know, precisely what the
3 problem was.
4 MR BEER: Thank you, Mrs Chambers.
5 Sir, we're finishing at 4.00 pm today.
6 Might that be a time for the afternoon break
7 until 3.10?
8 SIR WYN WILLIAMS: Yes, that's fine, Mr Beer.
9 Thanks.
10 MR BEER: Thank you very much.
11 (2.55 pm)
12 (A short break)
13 (3.09 pm)
14 MR BEER: Sir, good afternoon, can you see and hear
15 me?
16 SIR WYN WILLIAMS: Yes, I can, thank you.
17 MR BEER: Thank you.
18 Mrs Chambers, in your statement, you deal
19 with the question of what would happen if
20 Mr Castleton was logged on to node 1 at the
21 branch during the time that node 2 was out of
22 action, and then node 2 came back into action,
23 he logged out -- sorry, he logged on to node 2
24 without logging off node 1.
25 A. Yes.

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1 Q. First of all, can you explain in simple terms
2 what a node is?
3 A. A serving position, a counter, a separate -- two
4 separate computers.
5 Q. So he's initially logged on to node 1 --
6 A. Yes.
7 Q. -- at a time that node 2, the other counter, is
8 out of action?
9 A. Yes.
10 Q. Node 2 comes back online?
11 A. Yes.
12 Q. He logs on to that node 2 --
13 A. Yes.
14 Q. -- but without logging off from node 1?
15 A. Yes.
16 Q. You say, cutting through things, the result is
17 that any transactions that he had done on node 1
18 would travel with him for completion on to
19 node 2?
20 A. Any transactions that hadn't been settled on
21 node 1 would be moved over to node 2.
22 Q. Can we look, please, at LCAS0001300. Can we
23 look at page 337 in the bundle, please?
24 If you can go back a page. I think that was
25 it. Yes, I think that's 337, at the top there.

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1 Can that be expanded, please? Thank you. On
2 this page, can you, in broad terms, without
3 doing it column by column, explain what is shown
4 by this document and where the data comes from?
5 A. Right. This appears to be part of an ARQ
6 extract, what's, I think, usually called the
7 transaction log.
8 Q. So just stopping there, this shows transactions,
9 does it --
10 A. This shows transactions.
11 Q. -- as opposed to events?
12 A. Yes.
13 Q. Okay. Just in broad terms, tell us what the
14 difference between a transaction and an event
15 is?
16 A. A transaction has a financial value and is --
17 will subsequently be included in the branch
18 accounts. An event is various things, showing
19 users logging on/off --
20 Q. Printing?
21 A. Some -- yeah, AP and reports being printed.
22 Q. You said that this is ARQ data represented on
23 this page. Is this or could this be described
24 as raw ARQ data or has something been done to
25 get it into this format?

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1 A. I -- the underlying data, and I don't know
2   precisely what "ARQ" means, but the underlying
3   archived messages are the raw messages as
4   written on the counter, which get replicated to
5   the data centre and then get funnelled off into
6   files for audit.
7 Q. How is that, I'll call that raw data, translated
8   into a spreadsheet such as this?
9 A. An extract is -- would be run against that raw
10   data, pulling out all transactions in this case,
11   which is where you've got -- I've forgotten what
12   the extract did but it pulls out all lines where
13   you've got a product number and various other
14   attributes.
15 Q. Is that pulling out -- can that be described as
16   parsing?
17 A. I think parsing is more the sense where you've
18   found the records that you like but then, out of
19   those records, you pull out various pieces of
20   information, for example, user, session ID. So
21   the pasting is the breaking up of a message and
22   just pulling out certain pieces of information
23   from that message.
24 Q. Those two parts of the extraction and
25   presentation, respectively, were they done by
                          137

1   software that had been written in the SSC?
2 A. No. The access to the audited data was -- could
3   only be done by the Security team and they took
4   total responsibility for that and the SSC
5   weren't allowed anywhere near the audit data.
6 Q. So the Security team had to get the data -- the
7   raw data, as I'm calling it -- from where?
8 A. There were very big files that were accumulated
9   day, after day, after day, and then they had
10   tools which SSC did not support, which enabled
11   them to extract the data for the particular
12   branch for a particular date range and then to
13   format it in this way and to split it into event
14   data and transaction data.
15 Q. When it came to you, was it already in this type
16   of format?
17 A. I didn't normally look at data in this format at
18   all. We didn't use this data. Except --
19   I think the first time probably I ever saw data
20   in this format was for Marine Drive.
21 Q. Was for this case?
22 A. Yes. In 2006.
23 Q. So this first page, then, is looking at
24   transactions extracted from ARQ data?
25 A. Yes.
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1 Q. Then if we skip over two pages at 339 -- and
2   just if that can be expanded a little bit so you
3   can see -- is that showing the events data?
4 A. That's the events data, yes.
5 Q. Thank you.
6 A. There would also have been messages that didn't
7   fall into either of those categories.
8 Q. Thank you. Looking at 339, first, please.
9   I can't quite see what's happened on the screen
10   there. Thank you. Can we find the line which
11   is 12.41.50. Can you see that? It's almost
12   exactly halfway down the page.
13 A. Sorry, yes. I can see it.
14 Q. I wonder whether that can be highlighted.
15   12.41.50. It's now about eight lines in. Just
16   the one below that. Thank you. Does that show
17   that at 12.41.50 pm, the user, LCA001, logged on
18   to node 1?
19 A. Yes, it does.
20 Q. Can we see the node in the second column from
21   the left?
22 A. That's the node, yes, on which the message was
23   written and that must have been the node to
24   which he logged on.
25 Q. On the same page, can we see at 2.24.58, node 2
                          139

1   was up and running and LCA001 logged on to that?
2 A. Yes.
3 Q. Can we go back, please, to page 337, and scroll
4   down, please. Can we see between 14.21.12 and
5   14.22.14, before LCA001 had logged on to node 2,
6   those credentials appear against a series of,
7   I think, 14 pension transactions?
8 A. Yes.
9 Q. If we just track those, 14.21.12, right down to
10   14.22.14, so about 14 columns on -- 14.22.14 --
11   and one more. Thank you very much.
12   So before node 2 was up and running again,
13   at 2.24 pm, it's shown on these transactions, on
14   node 2, as appearing against 14 transactions
15   that are carried out in, I think, a period of
16   about 1 minute, 2 seconds; is that right?
17 A. Yes.
18 Q. Can you see in column F, in the session ID,
19   there is a series of numbers with "-1" after
20   them?
21 A. Yes.
22 Q. Do you understand from that that that is the
23   transactions travelling from node 1?
24 A. I wouldn't have -- well, yes, it's -- the
25   transactions were carried out on node 1. That's
                          140

1 why the session ID, which is the same for that
2 complete set, has got "1" in the third position
3 of it, after the branch code. So they were
4 carried out on node 1, but then finally at
5 14.22.14, the session -- ah, no.
6   Where's the -- the settlement's further down
7 somewhere, isn't it, I believe? Yes, we haven't
8 got a settlement in there at all. The confusing
9 thing about looking at the data in this format
10 is the time, it's the time that the transaction
11 was started, which isn't necessarily the time at
12 which the session was settled.
13 Q. If the transactions were made here with LCA001's
14 log-in, how could that happen before LCA001 had
15 logged in to node 2?
16 A. Because they were done on counter 1, which is
17 why the session ID and the transaction IDs all
18 have "1" in the third part of them. They were
19 carried out on counter 1 but they were not
20 settled before he logged on to counter 2. So
21 when he log on to counter 2, those transactions,
22 because they were still just on the stack and
23 hadn't been written to message store, so they
24 were transferred across to the second counter.
25 I think this is all explained very clearly in
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1 John Simpkins' witness statement.
2 Q. I'm asking you for your view at the moment.
3 We'll get to Mr Simpkins, I think, after
4 Christmas.
5 A. Yes. My view, when looking at this, was that
6 yes, they were done on counter 1 but because
7 they weren't settled before Mr Castleton logged
8 on to node 2, they were carried across to node 2
9 and somewhere further down we'll have
10 a transaction with the same session ID which is
11 the settlement for that session.
12 Q. Can we scroll down, please, and see whether we
13 can find that?
14 A. It's that one at 14.28.17.
15 Q. So four down from the top of the page.
16 A. I've lost ...
17 Q. Can you explain what that shows?
18 A. That shows that at 14.28.17 on counter 2 the
19 session that had been started on counter 1 with
20 the session ID 1-899855 was settled on counter 2
21 to cash for £1,350.75.
22 Q. Thank you. That can come down.
23   It's right, isn't it, that each week the
24 subpostmaster would carry forward cash in hand
25 and the stock in hand, so that one set of
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1 figures, from, say week 1 would feed into the
2 figures for week 2.
3 A. Yes.
4 Q. Can we, please, look at LCAS0000362, and
5 page 29, please. Just forgive me a moment
6 whilst I catch up in my hard copy papers.
7   (Pause)
8   Is this the cash account for week 41?
9 A. It appears to be, yes.
10 Q. We can see that in the top right-hand corner --
11 A. Yeah.
12 Q. -- in respect of Marine Drive --
13 A. Yes.
14 Q. -- Bridlington. Can we see that that week ended
15 7 January 2004?
16 A. Yeah. Cash account.
17 Q. Can we go to page 30, please. If we just go
18 back. I was taking the date from underneath
19 "Cash Account (Final)", "Week Ended" underneath
20 it?
21 A. That's the end of the accounting period but this
22 report wasn't actually printed and produced
23 until the --
24 Q. Until the 8th?
25 A. Until the 8th, in the morning.
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1 Q. So I wonder whether that can be highlighted
2 underneath the words "cash Account (Final)", the
3 words "Week Ended [7 January 2004]". Thank you.
4   Can we go to page 30, please, and scroll
5 down. Can you see the section of the cash
6 account dealing with cash and stock in hand.
7 A. Yes.
8 Q. Can you see that the cash in hand is £43,757.92?
9 A. Yes.
10 Q. Can you see that the stamps in hand are
11 £5,335.11?
12 A. Yes.
13 Q. So those figures ought to be the same when we
14 look at the transaction data in Horizon, yes, in
15 the ARQ data?
16 A. There wouldn't be -- that wouldn't be held as
17 transaction data in Horizon.
18 Q. It would be held as?
19 A. Opening figures, which aren't included in the
20 ARQ extract.
21 Q. Would they appear as "declare cash" or "declare
22 stamps" before the cash report account?
23 A. You would expect to see those figures or things
24 that added up to those figures in the event
25 data, yes.
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1 **Q.** In the event data. Thank you very much. Can we
2   try and look for that, then, please, remembering
3   those figures: 43,757 and 5,335, yes?
4 **A.** Yes.
5 **Q.** Can we look, please, at LCAS0000224. I wonder
6   whether that can be expanded, so we can see
7   a little more of it, please. Thank you. Can
8   you help us as to what these data are?
9 **A.** This is an extract from the ARQ event data. It
10   looks like it might not be all the --
11 **Q.** I missed the end of the sentence?
12 **A.** It's some lines, I think, from ARQ event data.
13   It's not a complete set of ARQ event data. It's
14   a subset.
15 **Q.** If we look for 8 January so if we scroll down,
16   please, and for 8 January 2004, can we see the
17   declare cash figure at 7.01.52 am?
18 **A.** Yes.
19 **Q.** The declare cash figure is £43,757.92?
20 **A.** Yes.
21 **Q.** The same figure?
22 **A.** I didn't write down the figure that we were
23   looking at before.
24 **Q.** Yes.
25 **A.** Yes.

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1 **Q.** So all okay, so far?
2 **A.** Yes.
3 **Q.** Can we look, then, at the declare stamp total
4   figures on 7 January at 17.06 and 17.41. If we
5   just scroll up a little. That's it, we've got
6   it, 17.06.
7 **A.** Yes, and then --
8 **Q.** Can you see "Declare stamp total, £1,183.22"?
9 **A.** Yes, I can. Again, they're not in date order,
10   in time order.
11 **Q.** There's a previous one --
12 **A.** Yeah.
13 **Q.** -- 35 minutes later, printed before --
14 **A.** Yes.
15 **Q.** -- namely 7.41.30, "Declare stamp total, 0".
16 **A.** Yeah.
17 **Q.** There aren't any other declare stamp total
18   figures on this page, are there, before the
19   report cash account entries the following
20   morning?
21 **A.** Doesn't look like it, no.
22 **Q.** Those two figures, 1,183.02 and then 0, at 17.46
23   and 17.41, neither of those match the "5,335.11
24   figure for stamps in hand, as it appears in the
25   final cash account, do they?

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1 **Q.** It's the same figure, yes.
2 **A.** Okay.
3 **Q.** That appears twice, declare cash total twice.
4   can you see that?
5 **A.** I can, yes.
6 **Q.** It doesn't matter for present purposes why that
7   is. Then a little while later, at 7.49.24, it
8   says, "Report Cash Account, Report Printed",
9   yes?
10 **A.** Yes. Sorry I'm rather puzzled by that data not
11   being in date order but never mind.
12 **Q.** Ie not in chronological time order?
13 **A.** Not in time order. The ONCH total above is
14   obviously from later that day so this data has
15   been manipulated in some ways. Sorry, I don't
16   mean that in a bad way but I'm just pointing it
17   out. But, yes --
18 **Q.** But these should be chronological time order?
19 **A.** They would have been when it -- I would have
20   thought they would have been when extracted for
21   the ARQ event data but, yes. So you've got
22   a cash account at 7.49.
23 **Q.** So would that have been the printing of the
24   document that we just looked at?
25 **A.** I assume so, yes.

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1 **A.** They don't appear to, no. Could we just go up
2   slightly further to the previous cash account?
3 **Q.** Yes.
4 **A.** Mm. Yes. No, I was just -- from this data, no,
5   I cannot explain that. One thing is that you
6   could make stamps and cash declarations with
7   different declaration IDs and then they got
8   added together, so the 0 wouldn't necessarily
9   wipe out the 1,183.22 but I don't know why what
10   is on that cash account --
11 **Q.** Is £5,335.11 for stamps?
12 **A.** Unless there was another declaration using
13   a different ID again, since the previous cash
14   account. But I can't --
15 **Q.** It's not shown on here, is it?
16 **A.** It's not showing on there, no.
17 **Q.** So the value of stamps had somehow reduced,
18   either to zero or £1,183.02 --
19 **A.** Yes, I can't explain that, looking at this.
20 **Q.** -- on these ARQ data, and that has not been
21   translated into the cash account for week 41,
22   has it?
23 **A.** That appears to be something that, at the
24   moment, I cannot explain, and could be an error.
25 **Q.** That would have disrupted the figures for week

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1   42, as well, wouldn't it?
2 A. What was -- that might have given them a loss in
3   week 41, but it shouldn't have then had any --
4   I wouldn't have thought it should have had any
5   knock-on effect but without looking at the data
6   and exactly what happened, I cannot tell. Did
7   they have a loss in --
8 Q. Yes, this is the first week. The first week,
9   week 41, that Mr Castleton phones in and says,
10   "I've suffered a loss, an unexplained loss".
11 A. Yes, I was unaware of this.
12 Q. Did you look at these data?
13 A. I thought that in the run-up to the 2006 trial
14   I looked in great detail at all the data from
15   January and February but I don't recall seeing
16   this particular issue, whether I looked at it
17   and could explain it, I now don't know. As I'm
18   saying, obviously, there's something slightly
19   odd about this particular dataset, in that
20   it's -- it is an extract, and it does seem to be
21   a slightly odd order.
22 Q. Just go back to the previous page, please.
23   Sorry, the top of this page. Thank you. Is
24   this -- are these data produced by Fujitsu? Can
25   you tell from the character strings set up?

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1 A. Yes, this is data that originally was produced
2   by Fujitsu, and you can see that you've got the
3   sort order there, so it should be -- attribute,
4   date and time is what it should be sorted on.
5   Now, just looking at it, you can see it is no
6   longer sorted on date and time. So I'm
7   wondering -- and, also, as I said, it's not
8   a complete set of event data in that there would
9   have been many other things -- you've not got
10   anybody logging on and off, for example, in
11   that.
12   So this is -- what was provided by Fujitsu
13   would have been a much bigger Excel spreadsheet,
14   and this is a subset, not a --
15 Q. Sorry, somebody coughed there, I couldn't hear
16   that. This was?
17 A. This appears to be a subset of that data and
18   that subsetting would have been done by somebody
19   other than Fujitsu. And it's also been sorted
20   into an order which is not the order that it
21   would have been provided by Fujitsu.
22 Q. Do you recognise the format of the presentation
23   of these data?
24 A. Oh, yes, it's in the format that you would
25   expect, and those lines at the top are what you

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1   would expect to see at the top of the ARQ event
2   data. But the content is not -- I mean, we've
3   got the full set of events for this period
4   somewhere in the evidence set and we could go
5   and look at that and see what was actually
6   presented by Fujitsu.
7 Q. That might be homework overnight.
8 A. I think it might be.
9 Q. But, on the face of it at the moment, these data
10   don't -- do not make sense to you, in that the
11   value of stamps has been reduced dramatically on
12   the ARQ data but not in the cash account for
13   week 41?
14 A. Yes.
15 Q. Can we look, please, at POL00112440 and look at
16   page 52, please. This is the first page of
17   a PEAK in relation to an entirely separate
18   branch.
19 A. Yes.
20 Q. You can see the FAD code there under the
21   summary.
22 A. Yes.
23 Q. It's not Mr Castleton's branch.
24 A. Yeah.
25 Q. So the summary is "Discrepancy with [cash

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1   account] for the last few weeks". Can we read,
2   please, the first few entries under the
3   narrative:
4   "Call details have been taken from Andrew
5   Wise at NBSC on telephone number stated above.
6   [Postmaster] has a discrepancy with his cash
7   account for the last few weeks."
8   So this is 13 January, so it's four days
9   before Mr -- four or five days -- no, it's the
10   day before Mr Castleton makes his first report,
11   yes?
12 A. Yeah, yes.
13 Q. That was on 14 January?
14 A. Yes.
15 Q. "Postmaster has a discrepancy with his cash
16   account for the last few weeks."
17 A. Yeah.
18 Q. "The NBSC have advised that the [postmaster] can
19   only declare the holding amount or 0 not
20   a negative figure."
21   Then reading on:
22   "The NBSC have been through the checks with
23   the [postmaster] and feel there is a software
24   error as the [postmaster] has negative figures
25   which he would not have been able to enter."

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1   A.   Yes.
2   Q.   "In week 37 the [postmaster] was showing
3   a surplus of £19.66 on the front page of the
4   cash account.
5   "In table 5 cash and stock he is showing
6   a surplus cash figure of £42,860.61 and
7   a surplus cheque figure of £116,248.50."
8   A.   Yes.
9   Q.   "The cash on hand was declared at £159,109.11.
10   In week 38 the [postmaster] had a surplus of
11   £49.22 on the front page of the cash account."
12   Yes?
13 A.   Yes.
14 Q.   Then, if we carry on reading, please. Just
15   scroll down. If you read to yourself, so
16   I don't have to read the figures out, what's
17   recorded in the second box from the bottom
18   there?
19 A.   Mm-hm.
20 Q.   Then over the page, please. Read the top box,
21   please.
22 A.   Yes.
23 Q.   Then scroll down, please. We see at 16.01 on
24   13 January, this call is assigned to you?
25 A.   Yes.
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1   Q.   What did "ESC" mean?
2   A.   Sorry?
3   Q.   It says, "Assigning call to Anne Chambers in
4   ESC"; is that the SSC?
5   A.   SSC or EDSC, which we were sometimes known as.
6   I don't know why --
7   Q.   Okay. It's not a different capacity you were
8   being assigned this call in?
9   A.   No.
10 Q.   You speak to the postmaster the next day. Can
11   we see that entry at the bottom?
12 A.   Yes.
13 Q.   "Spoke to [postmaster] to get some more info.
14   Before he balances he rems out his cheques,
15   although sometimes one or two more cheques are
16   taken before he balances the stock unit. He
17   declares cash then declares stamps then finally
18   declares stock. On the first declare stock line
19   he declares any rest home cheques he is
20   holding."
21   Can you help us with what "rest home
22   cheques" mean.
23 A.   I had no idea when I picked up this call but it
24   was some sort of a cheque that he received that
25   I think then pensions for everybody in the rest
                        154

1   home got --
2   Q.   So like a care home?
3   A.   Yeah.
4   Q.   Okay, that's not a technical description, it's
5   a reference to something like a care home?
6   A.   That was how the postmaster described it to me.
7   Q.   "This results in a discrepancy between the
8   system check figure and the declared figure."
9   A.   Yeah.
10 Q.   "Something has changed in the counter code
11   recently which causes the discrepancy to be
12   recorded wrongly. So the cheque discrepancy
13   instead of being cleared is doubled and the cash
14   is wrongly adjusted."
15 A.   Yeah.
16 Q.   "However, I think the [postmaster] should not be
17   declaring his rest home cheques in this way,
18   even if he's always done so. Need to get advice
19   on this or preferably get NBSC to explain what
20   the proper procedure is."
21 A.   Yeah.
22 Q.   Was this a postmaster declaring these care home
23   cheques in a slightly unusual way but he'd been
24   doing it for years, yes?
25 A.   Yes, he was doing something odd and -- but it
                        155

1   had never shown up as a problem on the system
2   but, because something had changed and suddenly
3   he started getting these very big numbers in
4   both cash and cheques showing in table 5 of the
5   cash account.
6   Q.   Something had changed in January to start --
7   A.   Yeah.
8   Q.   -- causing these problems --
9   A.   Yeah.
10 Q.   -- with, essentially doubling up, hadn't it?
11 A.   It wasn't quite doubling up but it was the way
12   that, if you rolled over with having declared
13   that you held a cheque, when it was treated with
14   the wrong sign, and then impacted the cash as
15   well.
16 Q.   We see later in the PEAK -- I'm not going to go
17   to the detail, that the problem had been caused
18   by a Horizon fix that had been released in
19   November 2003; do you remember?
20 A.   Yeah.
21 Q.   What was the Horizon fix that had been released
22   in 2003, November?
23 A.   I cannot remember -- no, I'm sorry, I can't
24   remember.
25 Q.   Okay, but it was the release of this fix by
                        156

1   Fujitsu that had caused what had previously not
2   been a problem to become a problem for this
3   postmaster --
4   A. Yes.
5   Q. -- and to cause discrepancies?
6   A. Yes.
7   Q. So it was the release of new software, the fix,
8   that was causing the problem?
9   A. Yes.
10 Q. Do you remember that this PEAK was signed off,
11   saying that the problem was the subpostmaster
12   not using the correct or standard procedure?
13 A. I don't recall that that was my conclusion on
14   the PEAK.
15 Q. Can we scroll down then, please. I think we can
16   see a continuation of your entry at the top of
17   the page there, yes?
18 A. Yes.
19 Q. On 15 January?
20 A. Yes.
21 Q. Then, if we carry on scrolling down, please.
22 A. "At that point I spoke to the PM and explained
23   it was a software problem."
24 Q. Yes. Later on the 15th, you email Julie Welsh,
25   who will pass it on to the Post Office, and you
                             157

1   asked the EPOSS Development to have a look at
2   it?
3   A. Yeah.
4   Q. Why were you asking the Development team
5   responsible for EPOSS to have a look at this?
6   A. Because EPOSS were -- that was the counter
7   software and it was a bug in their software.
8   Q. So it was a -- can I describe it this way,
9   a software bug in EPOSS --
10 A. Yeah.
11 Q. -- that was the root cause?
12 A. Yeah.
13 Q. You describe it as a nasty problem?
14 A. Yes, it was nasty in that every week things got
15   worse and worse and worse for a branch that was
16   encountering this problem.
17 Q. Then scroll down, please. Some more process
18   entries on the rest of that page. Then, at the
19   foot of the page, "Fix for 97081 was to blame".
20   That's the November '03 fix, yes?
21 A. Sorry, that was the?
22 Q. That was the November 2003 fix --
23 A. Yes.
24 Q. -- that was to blame?
25 A. Yeah.
                             158

1   Q. "Initialisation of the session, effect variable,
2   with [and then some code] was not initialised.
3   Alas, this will affect products such as cheque."
4   Yes?
5   A. Yes.
6   Q. Then scroll down, please. Some more process
7   entries, yes?
8   A. Yes.
9   Q. Forward to the 19th, scroll down, please. You
10   speak to the postmaster on the 19th. Is that
11   you?
12 A. No.
13 Q. That's somebody else, is it?
14 A. The call has been closed for some reason and
15   then reopened and so everything that was on it
16   before appears again.
17 Q. Okay. Oh, I see, yes. If we scroll down,
18   please, and again, and again, and again, and
19   again, and again. Just stop there.
20   Do you see at the top of the page an entry
21   is made:
22   "Phil needed this information for
23   a disciplinary with the [postmaster] tomorrow.
24   Advised Phil that this is basically user error
25   and 3rd line had advised the [postmaster] of
                             159

1   correct procedures."
2   A. Yes, that's not an update that I put on there
3   you can see, that's something that's been sent
4   across from PowerHelp. You can see HSH -- HSH1
5   is a PowerHelp user. So somebody on the
6   Helpdesk has looked at what I'd put previously
7   and has interpreted it, saying it was basically
8   user error, which was not my conclusion.
9   Q. It wasn't correct, in your view, was it?
10 A. No, it's not correct, no.
11 Q. It was a bug?
12 A. Yes, it was a bug.
13 Q. You hadn't advised third line of the correct
14   procedure?
15 A. I was third line.
16 Q. Yes. Sorry, you, third line, had not advised
17   the postmaster of the correct procedure?
18 A. I had spoken to the postmaster and I believed to
19   an auditor who was in the branch when I phoned,
20   and explained that I thought this was something
21   odd that they were doing but I had also said
22   that it was a software error.
23 Q. The further fix to deal with the bug that had
24   been introduced by the November 2003 fix was to
25   be part of the S60 release -- do you remember
                             160

1	that --	1	balance reports and in table 5 on the cash
2	**A.** Yes.	2	account report. And they were not present for
3	**Q.** -- which didn't proceed until July 2004; do you	3	Mr Castleton's branch.
4	remember that?	4	**Q.** Did you speak with the -- anyone at Marine Drive
5	**A.** I can't remember the dates.	5	to discuss their cheques practices?
6	**Q.** Okay I'll give a cross-reference for that.	6	**A.** No, I didn't, because I -- they'd already talked
7	There's no need to search for it, it's	7	to the NBSC and to the Helpdesk about that, and
8	FUJ00155590 at page 4, with S60 being authorised	8	the only problem with -- that I could see with
9	to proceed in July 2004.	9	their cheques was the one day where they hadn't
10	**A.** Okay.	10	cut off the report, which wasn't an uncommon
11	**Q.** When you came to Mr Castleton's case, do you	11	problem. It was -- there were so many things
12	think that there was any coincidence of timing	12	they had to do, it's not surprising that
13	or issues here, given that Mr Castleton	13	branches very occasionally failed to do one of
14	complained of difficulties with cheques?	14	the things that they were supposed to.
15	**A.** I looked at Mr Castleton's cheque handling and	15	**Q.** What would you have thought if you had spoken to
16	he certainly was not declaring cheques in the	16	the branch and they told you that cheques often
17	same way that this branch had been doing. He	17	seemed to clear to cash?
18	didn't use declare stock, he used adjust stock,	18	**A.** I'd have gotten them to give me some examples.
19	and it was very obvious for this particular	19	So you're saying that when they received
20	instance, which was the only one I ever saw with	20	a cheque in payment then it showed up on the
21	this particular problem, because on your balance	21	system as cash instead?
22	account, the balance report or, indeed, in the	22	**Q.** Yes, and that they got to the stage where this
23	cash account, it gave extremely large numbers	23	had happened more than once and that
24	increasing week-by-week for both cash and	24	Mr Castleton and the clerk would watch the other
25	cheques in the method of payment section on the	25	do it, so that they had two pairs of eyes
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1	watching what was happening when they had	1	assume that they had either pressed the fast
2	a cheque transaction to complete?	2	cash button or that -- the cash button,
3	**A.** So they were certain that they were pressing the	3	I believe they were two different ones.
4	cheque button --	4	**Q.** Was that a problem sometimes, calibration of the
5	**Q.** Correct.	5	screen, so that where you pressed a tile on
6	**A.** -- that it was actually being treated as cash?	6	the -- I'm calling it a tile, that might not be
7	**Q.** Yes.	7	the correct expression --
8	**A.** I would have advised them to get the screen	8	**A.** Yeah.
9	calibration checked.	9	**Q.** -- you know what I mean, an icon --
10	**Q.** Why would the screen calibration have raised its	10	**A.** Yeah.
11	head with you?	11	**Q.** -- on the screen, because of a miscalibration
12	**A.** Because if the buttons on the screen -- if they	12	the function performed was not what was
13	were using the buttons on the screen -- were --	13	intended?
14	if the calibration was slightly out, you could	14	**A.** That could be a problem but it would be pretty
15	press one button and it would have a slightly	15	consistent, so for everything you did it would
16	different effect. It shouldn't have been that	16	be out and I would have thought, although
17	far out and that, in fact, could have given all	17	I never worked in a branch, that it would be
18	sorts of problems. But that was part of the	18	fairly obvious fairly quickly to the user if
19	standard Helpdesk stuff, I think, so that if --	19	that were happening.
20	you know, if they said, "But we're pressing this	20	**Q.** But cheques clearing to cash may have fed into
21	button and something else happens", then you	21	what you saw when you examined the data, that
22	recalibrate the screen.	22	there were large discrepancies between daily
23	**Q.** You wouldn't have been able to tell any of that	23	cash declarations and what the system expected
24	from just looking at the Horizon data?	24	the cash to be?
25	**A.** No, to me, if it's settled to cash, I would	25	**A.** No, because at the end of each day when they had
	163		164

1   to go through their physical checks, they'd
2   print off the cheque report, which would show
3   the cheques that had been recorded for payments
4   on the system. They then had to compare that
5   with the physical cheques that they were holding
6   and if there were any differences. So if they
7   had a cheque and it went on the list of cheques,
8   they could do an adjustment which would adjust
9   between cash and cheques. So there would be no
10   loss or gain as a result of doing that.
11 Q. What if they did that at the end of the day,
12   where they could see that the cheque
13   transactions hadn't cleared to cheques, they'd
14   cleared to cash, what would happen to the
15   earlier misapplication of the cheque funds?
16 A. Nothing would happen to that, so you'd have your
17   earlier transaction, which would be, say, a bill
18   payment settled to cash, so you'd have -- those
19   lines would remain unchanged because once
20   they're written, they stay there. And then
21   further down at some point, you would see --
22   I mean, there were various ways that the
23   postmaster could do it but one way would be
24   doings a stock adjustment.
25   So you'd see a line then with "mode SAP",
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1   stock adjust positive, so your cheque going up
2   by whatever the amount was and the cash then
3   would come down by the same amount.
4   Q. Thank you very much.
5   A. There are examples of that in a very large
6   spreadsheet, which is available to everybody.
7 MR BEER: Thank you.
8   Sir, I don't know whether that's
9   a convenient moment for you. We've just reached
10   before 4.00 pm and it's a convenient moment in
11   the narrative.
12 SIR WYN WILLIAMS: Yes, of course. Thank you,
13   Mr Beer. So we'll resume again at 10.00
14   tomorrow.
15   Mrs Chambers, I got the impression that
16   you'd intended to do some homework, as it was
17   described, in respect of one line of questioning
18   this evening. Would you need to speak to anyone
19   about that or is that you just looking at the
20   documents, so to speak?
21 A. That's me attempting to look at documents on my
22   iPad, which may not be very easy.
23 SIR WYN WILLIAMS: Okay. I only ask because you
24   will appreciate that, unless I give you
25   permission to do so, you shouldn't speak to
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1   anyone about your evidence.
2   A. I won't speak to anyone.
3   SIR WYN WILLIAMS: I take it you don't need my
4   permission, if you decide to do some homework.
5   A. Thank you.
6   MR BEER: Thank you, sir. We've set it for
7   ourselves, too -- or I've set it for Mr Blake!
8   SIR WYN WILLIAMS: So there will be competing
9   homeworks this evening. Very good.
10 MR BEER: Yes, thank you very much.
11 SIR WYN WILLIAMS: See you in the morning to hear
12   the result of it.
13 (4.00 pm)
14   (The hearing adjourned until 10.00 am
15   the following day)
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