

lee castleton

REF P.R - 752033 - T.T.C.

From: "lee castleton" <[redacted]> GRO
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Hi Tadge,

I have enclosed the transcripts of evidence given in my case by Andrew Wise and Anne Chambers.

Andrew Wise is a Post Office Horizon Trainer. He has had various years of experience in teaching people to use Horizon.

You will see that he states that it is Absolutely impossible to transact business without you first logging on to Horizon.

This is because in order to reach the sales screen you have various secure checks to go through to prove the person using the system is,

a, The person they say they are, by giving your user code and then a password only known to that person to gain entry.

b, So the Horizon system can allow only access to the area's that are cleared to that person.

In the paperwork in my file held previously by Amanda Glover you will see the documents that the questions and answers are drawn from.

You will see that £1300 worth is transacted on node one whilst I was not logged on to the system. But as Andrew quite clearly states this is impossible.

Even though Post Office claim they have no access to the system themselves these transactions cannot have been transacted by me at that time. Therefore there is either back office access or the system itself has lost the transactions and then re-found them at a later date. Or the transactions are not from my office at all.

Anne Chambers is a Horizon computer system specialist. You will see in her answers that when asked about the contact of nodes in my office she explains that she needs to read up on the system to answer a question on nodes and there contact. You will see in the paperwork again left with Amanda Glover that the nodes are show as firstly losing contact and then clearly stating contact has been regained. Nothing unusual in that. But whilst Anne was quite happy to explain how and why contact is lost when I asked her why further down in the paperwork the document again clearly states contact to node 1 is lost but then as it had done before stating contact with node 1 regained was not printed. The document goes on to show contact with node 1 lost and a further contact with node 1 lost but again without contact with node 1 being regained. Anne Chambers then could not answer. She explains to the Judge that if she had known I was going to ask that question she would have read about that in the system.

For me I have asked various computer people. Can a system show loss of contact and then the resumption of contact in the first instance and then from then on just show repeated loss of contact without any reference to the regaining of contact as in the first case. The answer is always the same. NO.

A system when working correctly. Will always show the same reaction to the same instance. It is not organic and therefore has no choices to make.

Lee Castleton

ANDREW WISE

- A
- Q. So it would be quite a process to actually move through the numerous, is it three, screens?
- A. The navigation of the screens is quite quick. It may take a minute to log on to the system but once you're logged on the navigation is quite quick.
- Q. But the initial log-on itself, how long would it take, depending on how --
- A. It depends on how experienced the sub-Postmaster is. It can be a relatively quick process. The less experienced ones might have to sit and think about it before they begin to search for information.
- B
- Q. Obviously you have done this on numerous occasions and you teach people to do that in your job?
- A. Yes.
- C
- Q. Over that period of teaching, is it possible at any time to actually transact business without being logged on to this computer?
- A. You cannot enter anything on the system. Whether the sub-Postmaster chooses to serve a customer while not being logged on then that's --
- D
- Q. No, I mean on your -- sorry, I apologise. Let me understand what you are alluding to there. You would mean under somebody else's code?
- A. No. You can still physically serve a customer without being logged on.
- E
- Q. The computer itself would not see that, would it?
- A. You have to tell the computer what you're doing.
- Q. So you could not tell the computer that you are serving a customer if you are not logged on to that system?
- A. That's right.
- F
- Q. It is absolutely impossible?
- A. Yes.
- Q. Could you take out book 11B, please.
- G
- JUDGE HAVERY: How much longer are you going to be with this witness, Mr Castleton? I do not really want to make him stay (several inaudible words) if it can be avoided. I am not hurrying you at all; I just want to know.
- H
- MR CASTLETON: It would depend, my Lord (I am sorry for not being specific) on how far we can get through the questions.

JUDGE HAVERY: How many questions do you have, do you think, depending on getting a quick answer to each question?

A MR CASTLETON: Probably 16(?), my Lord.

JUDGE HAVERY: I think we will go on.

MR CASTLETON: If you could turn to book 11B, tab 103, page 3705. Have you ever seen one of those before?

B A. I've seen one once or twice. Is it (inaudible) transaction? I've never looked at on in depth to understand what information is on there.

Q. But you can see generally what that is?

C A. Yes.

Q. So we can actually look across and see in this 3705, this is actually a status report from my belief, and this would tell you who is logged on and who is not logged on. Is that correct?

D A. It tells you the user and what activity they've performed and the stock unit that they were attached to, along with the time and date.

JUDGE HAVERY: By the user, you mean which terminal, do you?

A. The RSP001, that relates to an individual. Each individual has a user name.

JUDGE HAVERY: I see. I expect LC is you, is it, Mr Castleton?

E A. My Lord.

JUDGE HAVERY: RSP, who is that?

A. It's Ruth Stammer(?).

F JUDGE HAVERY: Yes, I see.

MR CASTLETON: If we now just look back in that same book to 3703, 2 February. we can follow through here from what the actual computer (several inaudible words). Is that correct?

G A. Yes.

Q. And we can see who is logged on and who is not logged. Is that true?

A. Yes.

H

A Q. If we continue back towards actually where we were in the original, so we can flick through looking down and see whether (inaudible) are connected or various other things, but one of the things that we can actually see is, at 14.24 --

JUDGE HAVERY: What page?

MR CASTLETON: Sorry, my Lord, 3705, at 14.24.56.

JUDGE HAVERY: I see. Do you see that, Mr Wise, six lines from the bottom?

B A. I do, yes.

MR CASTLETON: That is myself, LCA001, logged on to node 2, is that correct, Mr Wise?

C A. Yes.

Q. Then if we go back over to 11A, page 3501, under tab 101, in the other book. Do you know what that document is?

A. I've never seen that one before.

D Q. Okay. If you look in the first column, there is ID and it is either a 1 or a 2. Do you know what that number pertains to?

A. I would guess that's the number of the terminal. If there were two Horizon terminals, it's either node 1 or node 2.

E Q. Is that a guess though?

A. That's a guess. I don't know that for sure.

Q. So you would not know anything that goes across this line? If we were to take the top line where it says "ID1, LCA001, stock unit 88" would you know anything from there?

F A. From experience I can pick out what the information is referring to is the stock unit, the date, the time. The session ID probably relates to the transaction that was performed. I'm not sure about the next column. The mode is the type of transaction (several inaudible words). The product, each product is assigned a product number so that would relate to the product but I don't know what product that is. The quantity is the number of products. And the sale value would be the sale of that particular transaction.

G Q. So, basically, you can transpose every column.

A. The last five there I'm not quite sure what they would have been: the entry method, state, IOOP, results and the last one there.

H

Q. (several inaudible words) I could tell you what those are but to be honest, for the purposes of the court, it is of no relevance to how things are inputted.

A

JUDGE HAVERY: Let us not worry about things that are not relevant.

MR CASTLETON: Could you tell me, in 3705, on the other book again, 11A, if you look down to the time that I log on, LCA001 logged on.

JUDGE HAVERY: It is (inaudible) 41.15. Is that it?

B

MR CASTLETON: That is actually into node 1, my Lord. If you look further down, I actually move across into node 2 which is at 14.24.56.

JUDGE HAVERY: I see. Do you see that?

C

A. Yes.

MR CASTLETON: If you then look across into the other book, my Lord, and you look across the seventh column down, you can see I appear there as LCA001 in node 2.

JUDGE HAVERY: Can you just repeat the numbers of the two documents we are comparing?

D

MR CASTLETON: Certainly, my Lord. It is bundle 11B, tab 103, page 3705, and bundle 11A, tab 101, document number 3501.

JUDGE HAVERY: I have those two, thank you.

E

MR CASTLETON: If you mark on 3705 on 2 February at 14.24.56, you will see that is the time that I personally logged on to the system. If you then look across to the other book, you will see the seventh transaction down from the top on 3501 was placed at 14.21.12, some three minutes prior to me logging on.

JUDGE HAVERY: I see. No one was logged on at all before then, is that right?

F

MR CASTLETON: I was logged on to node 1, the other computer.

JUDGE HAVERY: No one was logged on to 2, is that right?

MR CASTLETON: That is right, my Lord.

G

JUDGE HAVERY: I see. It looks like it. There is not on 3703 and 3704.

MR CASTLETON: No, my Lord. They are all 1s all the way through to the start of play, I am afraid.

H

JUDGE HAVERY: I think the question is fairly apparent now. How is it that page 3501, Mr Wise, shows apparently Mr Castleton making some entry at terminal 2 at 2.21.12, whereas he only logs on, according to the other one at page 3705, at 2.24.56?

A
*

A. I can't explain that.

JUDGE HAVERY: I assume it is precisely the same clock that is operating in both cases?

A. I don't deal at all with the technical side of the system. I wouldn't know, I'm sorry.

JUDGE HAVERY: Right. You are asking the wrong witness. There must be someone else to ask on this.

B

MR CASTLETON: You did say prior to this, I believe, that it is impossible to transact business without being logged on.

A. I did, yes.

C

Q. That is fine.

MR CASTLETON: I think that is fine, my Lord.

D

JUDGE HAVERY: I just have one or two questions for you, Mr Wise. If you could go back to your own statement, volume 3, behind tab 48. Would you look at paragraph 9 at page 302. Something I do not quite understand, it may even be a typing error, but when you are describing what the Postmaster does, you say: "They then complete a batch control voucher BCV in heavy type." Do you see that, about halfway down in paragraph 9?

A. Yes.

E

JUDGE HAVERY: "Paperclip", which I assume means something that is attached to an email, is that right?

F

A. No. So, the sub-Postmaster will complete the batch control voucher. We call it a BCV. We always abbreviate things in the Post Office. And you paperclip that batch control voucher, together with non-bar-coded and bar-coded TV licence forms. So for a TV licence transaction, they would have a physical slip that they've got in the office and they would paperclip that behind the batch control voucher and they're despatched to Chesterfield.

G

JUDGE HAVERY: Thank you. And the other one, would you turn to page 305, paragraph 22. Towards the bottom of the paragraph you say, "For example ...". Do you see that at line second from the bottom of the paragraph:

"For example, if the clerk records an item incorrectly on the system they should pick this up on their daily or weekly report. However, if they fail to do so this will be picked up at the processing centre."

H

We are now back to Chesterfield, are we, or possibly Northern Ireland?

A. If it's a Girobank transaction it could be Girobank in Bootle; it could be National Savings in Glasgow; it could be Chesterfield; it could be Northern Ireland. So it would depend on the transaction type.

JUDGE HAVERY: I see, yes. Then you say here: "If an item has been wrongly recorded, an error notice would be generated." How does that happen? That must be something that is done on the Horizon system, I assume?

A. Yes.

JUDGE HAVERY: So how does the Horizon system itself know that there is an error?

A. What happens, the transactions are input on to the Horizon system and the office would have the documentation that should agree with that figure. If they've missed something off (so for example they missed off a deposit and they've not put that through the system) when Girobank receive the dockets they check that figure against what's recorded on Horizon for that day and if it shows a discrepancy they would generate that error notice.

JUDGE HAVERY: Does the Horizon system check that or does it take the word of the recipient, Girobank or whoever it may be?

A. Horizon just relies on what the sub-Postmasters input on there and then Girobank check the physical work against what the sub-Postmasters put on the system.

JUDGE HAVERY: The Postmaster regularly sends off the documents in a bag or something?

A. Yes. They're despatched at the end of the day or week to different departments.

JUDGE HAVERY: So if there is an error, is it that what is in the bag is incorrect and your recipient finds that or what?

A. That's right. What is physically there in documents is what has got to be correct and if that disagrees with Horizon -- so it could be a sub-Postmaster has not recorded a document on Horizon, so the client would say, "Your system says you've done this number for this value but you've sent me documents for this value". So they would say there's a discrepancy of £100 here and that would generate the error notice.

JUDGE HAVERY: I see. Is the ultimate recipient checked by this at all or is just assumed that the ultimate recipient is right?

A. If an error notice comes through, the sub-Postmaster can challenge it and they can request for paperwork to be sent showing what the discrepancy is. So they would send copies of all the relevant paperwork and a copy of what was entered on Horizon. So a sub-Postmaster can challenge it and ask for evidence to be set through.

JUDGE HAVERY: I see, thank you. Any other questions?

AND CHAMBERS.

A: Yes.

Q: Then moving down to 13.30, and even after, there is no notice of node 2 being disconnected. Is that correct?

A: Node 2 was not doing anything at all (inaudible) until -- the first thing you have for node 2 is a log on at 14.24.

Q: Yes.

A: So node 2 did not do anything at all prior to that which was included on this particular report.

Q: But it must have been disconnected, we have established --

A: It could not say it was disconnected if it was not working.

Q: Then would it not say that it had reconnected?

A: No, because it was not ever disconnected, it was just completely -- if a node is not operational it is not disconnected, it is just not operational at all.

Q: On reconnection surely it would say it was reconnected.

A: No, because it had not ever been disconnected. You do not get that event logged. Disconnected means that it is working as it should be except it is not communicating with the other nodes. In this case it just was not working so it was not a loss of connection and reconnection, it was just completely down and then, yes, now it is working.

Q: So on this log if at any point node 2 had become disconnected it would show on the log.

A: If node 2 had been operational at the time and that had been disconnected it would have said so, yes. Yes, I believe it would have said so.

Q: So being not working but connected it would not show a disconnection.

A: No, because it cannot log anything because it is not working.

Q: When you reboot the machine to put it back online should it not show that node 2 had reconnected? Because surely it knows that it is disconnected when it is powered down and taken away.

A: This is not what this check is doing and it would only report reconnection if it had already flagged internally that it had had a disconnection and it would not flag that if it was just turned off.

Q: If we turn to page 3705, at 12.41.51, midway through the page --

A: Yes.

A
Q: -- is that node 1 disconnected?

A: That appears to be node 1 disconnected.

Q: Then further down the page at 14.03.42.

A: Node 1 has regained its connection.

Q: So that is how it would be depicted.

B
A: Yes, but that would only be if your counter was operating normally but the network between the two counters was not working properly. If that was the case you would see disconnected and regained connection messages.

Q: So that would be the disconnection between the counters or between yourselves and the counter itself?

C
A: I am not 100 per cent sure of this and it is something if I had known I was going to be asked about it I would have made sure I did know.

Q: Just with it being part of your --

D
A: This is not part of my evidence. There is nothing to do with this in my witness statement.

Q: I apologise. My next question was going to be, if you would turn back to 3703, midway down the page at 09.20.29 there is a further node 1 disconnection.

E
A: Yes.

Q: If you follow that through it never actually says that node 1 reconnects until it disconnects again at 12.41.51.

A: I cannot tell just from this why that would be.

F
Q: Right. To have it depicted in one way between where we see the reconnection further down the page at 14.05.53, I can appreciate obviously that, as you have told me, this is not your area, it was obviously a question that I was going to raise to yourself with respect to how it has not reconnected and how the system does not seem to know whether node 2 has been taken away and replaced or not.

G
A: If node 2 was not working all morning then I am not surprised that node 1 had become completely disconnected.

Q: But it does not show the reconnection before disconnection again, does it?

H
A: Whether it was because the engineer was briefly plugging things in and then unplugging them again --

Q: It does actually occur in other areas.

A: -- I really cannot explain that, not from this information. If I looked at it in conjunction with other things --

HIS HONOUR JUDGE HAVERY: What are these other entries after the entry of 09.20.29 saying node 1 is completely disconnected? The next entry is three minutes later and it says "ID1". That is node 1, is it?

A: Yes, node 1 was operational.

HIS HONOUR JUDGE HAVERY: If you have this entry for 09.23.23 saying: "Report APS receipt" and the report printed and all that, can that happen if node 1 is disconnected or what?

A: Yes, because node 1 was disconnected in that, I assume, it realised it could no longer talk to node 2, but it was still operating properly in itself.

HIS HONOUR JUDGE HAVERY: It was still operating as a computer on its own?

A: Yes.

HIS HONOUR JUDGE HAVERY: I see.

THE DEFENDANT: So the disconnections of node 1 to node 2 is the only thing that is depicted in there, it is not the connection to the network?

A: I am not 100 per cent sure whether it is also taking into account the connection to the data centre.

Q: So it could well be that node 1 and node 2 at different points were disconnected from the system completely?

A: Except you appear to have been doing (inaudible).

Q: That is what I cannot understand.

HIS HONOUR JUDGE HAVERY: You are interrupting the answer, that is the problem.

THE DEFENDANT: Sorry, my Lord, I apologise.

HIS HONOUR JUDGE HAVERY: Would you mind finishing the answer, Mrs Chambers?

A: Yes, I believe it looks like you have managed to carry on doing online transactions during the morning from your gateway, your counter 1, which suggests that the communications between the gateway and the data centre were working as they should be and it was just counter 2 that was not operating at all.

THE DEFENDANT: Then would it not say that counter 2 has disconnected from the network?

A

A: No, because it is counter 2 itself that would report that and counter 2 was not working so it could not report it.

Q: So why would it report node 1 was disconnected?

B

A: Because node 1 realised it could not see counter 2. It should be able always to talk to counter 2 as well as to the data centre. If counter 2 has been turned off, or whatever, then node 1 will say it has been disconnected from the network. We are talking about the network within the branch.

Q: Yes, the local network.

C

A: Certainly that. I am not sure if we are also talking about the network to the data centre, but certainly within the branch node 1 was up and running and you were using it but it could not talk to node 2 because node 2 was down and not working.

Q: I am just going to turn back to your own statement now. It is under tab 51, page 58.

D

A: Yes.

Q: Are you happy with what it says?

A: Yes.

Q: Could you just explain to me the fifth line down? What does that mean?

E

A: What, no transaction date and time?

Q: Yes.

A: That is just something one of our other call logging systems shoves in to responses which have then been cut and pasted --

F

Q: So this is a cut and paste?

A: Yes, it is completely irrelevant.

Q: But it has been cut and pasted from another document then?

G

A: That information in there, yes. That was the response that I gave to the call that I had investigated, which we will be able to see somewhere in these calls that were attached to my evidence. It would have been call D0402251077, which appears to be tab 106, page 4141. If you look in there you will see that that precise same text is in there.

H

Q: Why would it appear as another transaction date and time was provided for this action using current date and time?

it is likely, and I would be happier if I could have some more information on the background --

Q: No, I appreciate that.

A: -- but it seems highly likely that it was a problem which has occurred very intermittently over the years to date where for some reason when they are doing their balance process on one counter, one counter is not communicating properly with the rest, you do not get a disconnected node message but it would do its balancing based on a static point and it will not see later changes that are being made on other counters. This is a known problem. It does get picked up centrally because it is raising events every few seconds and so I would expect for any of these sites that there would be a call raised. It is also very obvious if we have to look at anything to do with one of these. For this specific branch, if it was Calendar Square, which I know we did have problems with this sort of problem with, then yes, we knew there were system problems.

Q: (Inaudible) Calendar Square, that is not in Scotland, is it?

A: Yes, it is.

Q: Is it?

A: Yes, Falkirk.

Q: (Inaudible).

A: Yes, I believe this might be Calendar Square, but I cannot remember the fad code off the top of my head. Yes, I can, it is 160848; I believe, but I am not quite certain. Yes, if we are talking about this branch, they for some reason had this problem several weeks in a row. As I said, it does happen intermittently but it is very rare for it to happen repeatedly. The first week it gave a number of receipts and payments mismatched because they did a transferring twice. You can only do transfers, you may not be aware of this because I believe you are (inaudible) a single stock unit --

Q: That is true, yes.

A: -- but this transfer problem only happens if you have more than one stock unit and you transferred stuff from one to the other. The second counter did not realise, did not recognise, that it had been done and allowed it to be done a second time, which should not be possible.

Q: (Inaudible).

A: That gave them both a loss and a receipt and payments mismatched. That was picked up because we monitored for receipts and payments mismatches. It was also picked up because there was a flood of events from this site which we recognised. They had the same thing the following week, although that week it did not cause them any loss or gain because they did not

A do the transferring twice. It happened a third week and at that point I got a call about it which I passed on to our development team. And also we passed the information about the problem on to Post Office Limited so that they could sort out the financial implications and I believe in this case the problem was that (inaudible) information then did get sorted out at branch level of Post Office Limited. But from the Horizon point of view, yes, they had a system error which we were very well aware of and I saw no evidence of a similar system error at your branch. And I would have seen it had it been there.

B Q: You would have seen that?

A: Yes.

Q: What evidence would that have produced?

C A: In your system event log, which we do not have here, there would have been hundreds, if not thousands, of the events, saying every few seconds that (inaudible) is held. So that would have shown that. It also would have shown in the message store because it would have potentially only included transactions up to an earlier point than where you had actually gone to. But because when you do a balancing it does draw a line under the transactions which it has processed, the following week it would have included in here what it would have missed in the first week. So in fact overall, as long as you do not have this extra transfer problem, which you could not have had, it would give you some very confusing results as you balance, but it would then sort it out subsequently. But I really do not think you had that problem. That is one of the things I was looking for.

D E Q: Throughout the process we have heard various evidence as to what (inaudible) occurred and what has not occurred.

A: Yes.

F Q: My question has always been: why when we produce snapshots on Sundays we were way over in cash and other days we were under? It is not the type of --

A: This is more a business issue, but the balance snapshot does not recalculate your discrepancy.

G Q: No, I appreciate that. What I am looking at is this system produces obviously (inaudible) from the transactions that are placed. Is that correct?

A: Yes, but I do not think I am going to be able to talk sensibly about the snapshots because that is more of a business process than a system process and I do not think I can talk off the cuff (inaudible).

H Q: That is fine. I was saying my question was raised because of being, as you say, over, under.

A look!

A: But the cash figure which is used is your last cash declaration that you made the last time you balanced.

Q: Absolutely, yes.

A: Adjusted by what you have recorded on the system since the event. It does not then work out what the discrepancy is.

Q: No, but obviously by checking the cash and cheque --

A: Yes, but I cannot see that because that is not --

THE DEFENDANT: No, I appreciate that, but those calls were made. I appreciate that you do not see that because that evidence is not (inaudible). That is fine, I am happy with that. Thank you.

RE-EXAMINATION BY MR MORGAN

MR MORGAN: Miss Chambers, three questions. The first is something that I am not clear on and it is, I think, technical language. What is a Riposte system?

A: Riposte is the software that forms the basis of the Horizon system which was written by a third party supplier, not by Fujitsu, and which there is an awful lot of extra stuff that has been put around the edge of it, but Riposte is the system at the heart of it. When the system turns itself on after a reboot, or whatever, or when you log out (inaudible) it says "Riposte" across the front of it.

Q: We looked at the document at page 2557AO and you thought it might be Calendar Square and you said that the particular discrepancy or difficulty that arose there only happened if there were multiple stock units and did not happen with single stock units.

A: Yes.

Q: How do you know that?

A: Because you cannot do a transfer -- a transfer is movement from one stock unit to another stock unit. That is what that function does.

Q: How do you know that the error only occurs in those circumstances?

A: The error does not, but the error that gave you a loss (inaudible), I cannot be 100 per cent sure, but I am just about certain that all the cases I have seen over a number of years where this has happened, it has only been in that particular situation where they were able to do a transfer in twice, which should not have been allowed, that actually resulted in both the receipts and payments mismatch and a (inaudible).

Q: You talked about how it would be reflected in the events log.