

**Conf call with SB and IRH re Bracknell**

**IAN HENDERSON:** ... person nominally responsible for, you know, the Bracknell function for the last sort of couple of years, you know, that may have some, you know, sort of consequences, and I think what we wanted to do was to protect you from that, you know, so that, you know, if there was, you know, an investigation or any issues, you know, coming from it, you were not contaminated, you know, with stuff that -- that we've been dealing with.

Now, that, I understand, was the sort of thinking that Susan had, and I mean, frankly nothing has changed other than, you know, it looks like there are legitimate sort of, you know, issues to -- to look at, which in my view reinforces the need to keep you, sort of, protected from it.

But --

**SIMON:** Well, what do you -- it's your -- I mean, I'm -- I will take your judgment on this. I mean, I'm just worried that it's not getting the focus it needs. I feel like I should take ownership of it.

I guess Leslie, my boss's view, is that I'm kind of compromised anyway, because I work in IT, and this is essentially a -- the whole investigation (unclear) has been about Horizon, which is an IT thing.

**IAN HENDERSON:** I think this a bit more, Simon. I mean, you know, a potential criticism, you know, could be lack of, sort of, supervision, lack of monitoring, lack of control environment and so on, specifically in relation to Bracknell. Now, that is much more specific than, you know, general, sort of, you know, defects in Horizon or -- or whatever, and that's

why -- you know, maybe out of an excess of caution I still think you should not be directly, sort of, involved in it and you should not be, sort of, you know, asking questions about it and you should not be receiving information about it.

But, as I say, that might be an excess of caution. At the end of the day it's a judgment call that needs to be made not by you but by POL senior management, including input from Susan or, frankly, external legal advice. And if Susan's not available, maybe you want to bounce it off, you know, either one of the other lawyers or even an external lawyer.

**SIMON:** Okay, I'll tell you then -- what I'm going to do then -- also, if there's a -- I have to protect myself as well, don't I, so --

**IAN HENDERSON:** Yes.

**SIMON:** So I think what I'll do then is I'm quite happy to have an off-the-record conversation, because I am, sort of, pursuing this just for my own agenda, because I am a little bit concerned, from what I've already heard, which I -- I'm sure I can do in sort of unofficial capacity, and I will have a conversation with Susan when she gets back about what -- where she wants to take this. But -- so what things, sort of, were you -- so --

**IAN HENDERSON:** Sorry to interrupt, Simon, the other thing you might want to do -- you know Rodric, who did the drafting on the JFSA agreement, I mean, I was very impressed by him. You might want to have a quiet word with him and just give him the facts and the thinking that I've outlined. If he wants to talk to me I'm more than happy to do that but I -- you know, in terms of just getting some informal advice quickly, I would have thought Rodric was as good a person to talk to as anyone.

**RON WARMINGTON:** Yes, good suggestion. He came across well, didn't he?

**IAN HENDERSON:** Yeah.

**SIMON:** In terms of this specific issue, I know you've got an email. Is there anything else?

**IAN HENDERSON:** The short answer is it's a bit early to say. It's more than one email. I mean, we've got one very specific email that refers to concerns by PNBA. We've got, sort of, other emails that talk about the Bracknell function, accessing live data, making changes to the system, not in real time but some -- and I don't know what the -- you know, the method is, but it says something, from memory, along the lines of "Oh, and this will be corrected overnight" or "We'll make these adjustments in the overnight run". So it again suggests some sort of -- you know, it may well be sort of journal capacity or some direct access to what is live data but not in real time, in other words, some sort of batch process that runs overnight.

**SIMON:** Okay.

**IAN HENDERSON:** And we have got multiple emails sort of relating to that. But that is based on a very limited set of data. I don't know if you were aware but the IT people had various sort of technical issues getting the emails extracted. We got them for some users, we didn't get them for others. The ones that were extracted there were some technical problems getting them to me and they had to basically sort of redo the whole exercise and that was a further delay, and I'm now processing the second batch of emails. So we've only looked at about 40 per cent of the stuff that is available.

**SIMON:** Okay.

So just to bring you up to speed where I am, I did ask Fujitsu to (unclear) come clean, and apparently there is a process where -- so there is a technical avenue where you can technically do some form of adjustment, you know, and -- but apparently

it's very carefully monitored, controlled, audited stuff -- type stuff.

Now, I don't -- what -- the impression I've got was it would -- it would have records, it wouldn't change records. So I'm going to challenge Rob this afternoon on that. Because I would have thought the only person that would be aware of it from a -- sorry, the person who would have to sign it off, I would have thought, would be our finance centre.

**IAN HENDERSON:** Well, but the impression I get from looking at the emails is, whilst if -- you know, in theory, there might be those, sort of, you know, controls and so on, that, you know, they're the sort of controls that are in a procedures manual. There's actually -- there's no electronic block, if I can put it that way. In other words, you know, if somebody in Bracknell had a brainstorm and wanted to do something, they could just do it. What the control environment says is you need to be approved by, you know, XYZ, but, as I say, there's not an electronic block and there's nothing to stop them, as I understand it, doing whatever the capabilities are without that approval.

**RON WARMINGTON:** Yeah, we sometimes refer to them as controls for those who wish to obey them.

**MR MOLONEY:** Yeah, so if you're a superuser, then you've got access to everything and I imagine there must be a superuser account somewhere, because every system would have one.

**RON WARMINGTON:** Well, not just that. Not -- I mean -- and superuser is always an issue everywhere, but if you've got an authorised user of that functionality who then somehow either abuses that under his own allocated ID or is able -- this infers a superuser power -- to create a new ID, then the user manual might as well be thrown out the window.

**IAN HENDERSON:** Yeah, but then again, Ron, I think that's all speculation. I think we ought to stick to

facts. But, you know, what I'm seeing in the emails is they seem to have either the capability that was alleged or something pretty bloody close to it. It seems to have been used on multiple occasions. It seems to be used, on some occasions, following a request from the Helpdesk to do some correction or to make some adjustment that they've been unable to do using what I might call "normal processes". You know, what we have not got any understanding of is the actual let's call it physical control environment rather than the -- sort of, the procedures manual.

**SIMON:** So I've been reassured there is an audit table of -- of this, a specific audit table (unclear) and I've been told it's a very -- it's used very rarely. Would it be appropriate for me to ask for that audit table?

**IAN HENDERSON:** Yeah, I think so. I mean, one thing that I was planning to do when I've finished going through all the emails, we have identified some very specific dates and times and, indeed, branches where this capability is -- you know, is alleged to have been used -- and, sorry, this has come from emails, not the JFSA -- and what I was going to do was to request Horizon data for those branches for those very specific time periods and use that to drill into that to see how the Bracknell changes manifest themselves, whether they are shown as, you know, a system adjustment, a journal, you know, adjustment or whatever, or whether they are linked -- and this would be the nightmare scenario -- whether they are linked to an SPMR's ID.

**SIMON:** Yes, that would be a nightmare. The other factor for me is, was the subpostmaster informed?

**RON WARMINGTON:** Yes.

**IAN HENDERSON:** Sorry, Ron, when you say yes, is that the yes, the postmaster was informed?

**RON WARMINGTON:** No, it isn't. It is: yes, I concur that

that is a valid question to ask.

**IAN HENDERSON:** Yeah. And based on the email traffic that I've seen, there's nothing to indicate that he or she was informed, other than perhaps a call to the Helpdesk or something like that.

**RON WARMINGTON:** They may be referring to this as the fast track process, Ian. You've seen that in one of the emails. I've got one up on the screen that moment.

**IAN HENDERSON:** Again, I'm interpreting that as meaning this needs to be resolved, sort of, urgently. We're going to Bracknell because you guys can do it more quickly than maybe going through the official route, if I can put it that way.

**RON WARMINGTON:** Yes, yes, true.

**SIMON:** (unclear). Okay.

Okay, so I'm going to take your advice. I'm not going to pick up SRO5. I am going to, sort of, continue to dig around, I think, just for my own (unclear) and for my own benefit, and also I think I want to keep Alwyn and Susan informed of what I've come up with, because for them before (unclear) you know, of what's going on. Because they are not aware of any of this by the way.

**IAN HENDERSON:** Okay.

**SIMON:** Because I've told them I've just found out from Fujitsu there is a mechanism, and their faces dropped.

**IAN HENDERSON:** And by the way, I mean, one of the key emails, you know, has Gareth Jenkins' name all over it. So it was absolutely clear that this was a widely understood capability within the system.

**SIMON:** Well, Gareth did -- Gareth is the one that told me yesterday, and he didn't make any effort to hide

it.

**IAN HENDERSON:** No, I'm not surprised. Gareth has always struck me as, you know, straight as a die.

**RON WARMINGTON:** Yeah.

**IAN HENDERSON:** And, you know, I'm very happy to sort of deal with him. So what you've identified is pretty much what we found going through the emails, or certainly one aspect of them.

**SIMON:** Okay. So I'm going to ask for that audit log because I'm really getting bored of this, and I need to find out what that process is.

So I'm seeing Rod Ismay --

**RON WARMINGTON:** What is relevant is if we have, as we understand, got a call with Paula and others today, it would not be wise, I think, for us to be the ones that -- the one that informs her of this.

You know, I think she's got to be -- I would say you've got to decide whether you want her to know about this before the Arbuthnot meeting, and if she does know about it before the Arbuthnot meeting you've got to make the decision whether she tells him about it. And he'd probably completely hold back on the grounds that it's still being researched.

**IAN HENDERSON:** No, Ron, I don't think you can. This is so close to -- it's one of the issues at the heart of the complaint.

**RON WARMINGTON:** Yeah.

**IAN HENDERSON:** You know, and I think we pretty well have confirmed that -- you know, that the capability that was alleged in some shape or form does appear to exist. What we don't know is how it was used, when it was used, what the impact of it -- so that's the research element. But there is -- there seems to

be, in my mind anyway, no doubt about the existence of that capability.

**RON WARMINGTON:** Yeah. By the way, I've also come across the phrase "TC outbound". That may be the generic terminology they're using to describe these, it may not be.

**IAN HENDERSON:** Well, that, I think, is the mechanism of the corrections or the adjustments that were being done by this unit in Bracknell.

**RON WARMINGTON:** Yeah.

**SIMON:** Well, TC is a known thing, isn't it? Fast track TC.

**RON WARMINGTON:** Yeah.

**IAN HENDERSON:** And, again, not acting in real time. In other words, not directly changing sort of live data but some sort of, let's call it, a journal process that is then posted to the live data on an overnight basis. That's -- that's where we are. And, I mean, I've shared with you pretty much everything we know about it at the moment. But, as I say, it's early days.

**SIMON:** Okay. Right, okay, that's been very helpful. So I'll let you know.

So, on the Paula issue --

**RON WARMINGTON:** Mmm.

**SIMON:** I mean, I told Alwyn about this and I've said, look, there's a chance you may raise it, so I've left it to her to make that call.

**RON WARMINGTON:** We'll be in a very awkward position if we're trying to defend why we are concerned -- you know, the whole issue about, sort of, Arbuthnot's main concern, you know, how he would react, you know. We can't keep this stuff from him.

**IAN HENDERSON:** If we're asked a straight question and -- you know, by frankly anybody, we've got to give a straight answer, and I think in relation to Arbuthnot, someone needs to brief Paula before we have that call this afternoon.

**SIMON:** What time is the call?

**IAN HENDERSON:** Don't know.

**RON WARMINGTON:** We don't know. We don't know. The only other thing I know about it is when you said to me the reason we're not going to have the call with Alwyn is did you say because because I understand you guys are going to have a call with Alwyn and Paula this afternoon?

**IAN HENDERSON:** We haven't had the invite yet.

**RON WARMINGTON:** Correct.

**SIMON:** Okay, I'm going to leave that to Alwyn to brief Paula on the Bracknell issue.

**RON WARMINGTON:** By the way, another slight clue, I'm seeing references to the acronyms TPZ and TPQ, so --

**IAN HENDERSON:** Ron, let's not get into any detail. Things like that are still under investigation, and --

**RON WARMINGTON:** Yeah.

**IAN HENDERSON:** -- I think it's going to confuse the issue if we tell Simon any more.

**RON WARMINGTON:** All right, okay.

**SIMON:** So my next chat, I'm going to talk to Rod. There may be an innocent explanation to all this, let's hope. So -- and then I'm going to talk to Gareth to see what he has to say about this whole scenario.

**IAN HENDERSON:** But Simon, just to emphasise one point, you need to distinguish between process controls and what I might call physical sort of controls and, frankly, what's not going to, using Ron's term, cut the mustard is having a procedures manual saying: you're meant to do X, Y and Z. The only thing that would actually have any effect is if there was, you know, say, two-factor authentication and you actually had to have a separate user execute, you know, a command in order to sort of authorise something, and you -- as far as I'm aware, you haven't got that.

**SIMON:** I would doubt it, because that's not how it's been designed.

Okay, so, yeah, I'll do that. And as Ron always said, process controls are there for people whose want to pay for them.

**IAN HENDERSON:** Yes.

**SIMON:** If I haven't learnt anything else from this whole investigation, I will always remember that.

**RON WARMINGTON:** Well, thank you.

Okay, all right, well, look, thanks for the call and the frankness of this. That's great. We are on stand by then for any call with the others as we're instructed.

**SIMON:** Okay.

**IAN HENDERSON:** I will want to know at least what time that is going to be so I can sort of clear my diary and so on.

**SIMON:** Yeah, I'm surprised it's not in your diary. I don't know. Okay, I'll -- if I hear anything, I'll let you know.

**IAN HENDERSON:** Are you going to talk to Rodric?

**SIMON:** No, I'm not going to do -- I'm not going to do anything on SR05, I'm going to wait to see --

**IAN HENDERSON:** No, I mean Rod the lawyer.

**SIMON:** About when I pick this up?

**RON WARMINGTON:** Yeah.

**IAN HENDERSON:** Or just, you know, how you need to protect yourself and what you need to do.

**SIMON:** Yeah. I will, yeah, have a chat with him.

**IAN HENDERSON:** Okay.

**SIMON:** Okay, thank you very much.

**RON WARMINGTON:** Thank you, Simon.

**IAN HENDERSON:** Thank you, Simon.

**RON WARMINGTON:** Bye now.

**(Simon leaves the call)**

**RON WARMINGTON:** Hello, Ian. Whoa, interesting. So I would have thought they would have twigged this already but if he said their faces dropped, it does sound like it's a real issue, doesn't it?

**IAN HENDERSON:** Well, that's what I said as soon as I saw the emails.

**RON WARMINGTON:** Yeah.

**IAN HENDERSON:** Yeah.

**RON WARMINGTON:** Well, and they'd better not hold this from the two top ladies very much longer.

**IAN HENDERSON:** No, I agree.

**RON WARMINGTON:** Because they're going to be pissed off as hell. If they give more assurances in tomorrow's call, she does, only to find two hours later that she shouldn't have given them that will be bloody embarrassing. All right. Well, well done. I feel like somebody who's kayaking in a home-made kayak through the fucking Grand Canyon rapids.

**IAN HENDERSON:** Yeah. It's a bit bumpy, isn't it?

**RON WARMINGTON:** It is a bit. It's all good fun, isn't it, really.

**IAN HENDERSON:** Well ...

**RON WARMINGTON:** Yeah, I had read all -- reading this stuff, you know, it's kind of like -- it's circular. It's like we've always said; you've got to read stuff, then you read it again and then the third time through it you kind of -- you've learnt from the end of the queue --

**IAN HENDERSON:** It's definitely sort of --

**RON WARMINGTON:** It means more.

**IAN HENDERSON:** You've got of sort of, you know, get it on the course a few times.

**RON WARMINGTON:** Yeah.

**IAN HENDERSON:** And -- but, you know, just standing back and looking at all of this, almost everything that's been alleged is turning out to be either true or bloody close to the truth.

**RON WARMINGTON:** Yeah, yeah.

**IAN HENDERSON:** I don't think there's anything that we can categorically reject.

**RON WARMINGTON:** No, that's right. Yeah. Yeah. Yeah, interesting. Yeah, I'm just reading some of the other ones. He sent me about 20 of them and even

that lot is -- every one's interesting, you know.

**IAN HENDERSON:** Oh yeah.

**RON WARMINGTON:** And one of them is speculating on certainly the TCs about bounced cheques.

**IAN HENDERSON:** Ah, don't get misled by that because I looked at that. That was some test cheques or something, if we're talking about the same thing, that they had for processing for testing.

**RON WARMINGTON:** Okay.

**IAN HENDERSON:** They had some let's call them dummy cheques or something.

**RON WARMINGTON:** Okay.

**IAN HENDERSON:** And some of them went missing.

**RON WARMINGTON:** Oh, okay. Yeah, right. Okay. Well, that's -- as you say, that's why it's an iterative process. You kind of learn that and then it becomes less important.

**IAN HENDERSON:** Yeah.

**RON WARMINGTON:** All right. Okay. Great stuff. Time for a cup of tea, I think.

**IAN HENDERSON:** Yeah but I wish we could get a rough time for Paula.

**RON WARMINGTON:** Well, let me have a look at email traffic.

**IAN HENDERSON:** There's nothing come in.

**RON WARMINGTON:** You're right; there's nothing come in, yeah. Okay. Well, we'll wait and see. I suppose they're chewing horn(?) themselves, aren't they?

**IAN HENDERSON:** Well, and also, I mean, she's presumably

got, you know, some other things --

**RON WARMINGTON:** Some other things to do. Yeah, you would think so.

**IAN HENDERSON:** Yeah.

**RON WARMINGTON:** Anyway, the sun's come out. It's rather nice. I might go --

**IAN HENDERSON:** I mean, how are we going to play it with, sort of -- sort of, Paula? Are we going to sort of pin our ears back? I suppose it would be polite to do that to start with.

**RON WARMINGTON:** Yeah. Yeah. And, I mean, her issue's going to be: why is it taking so long? And I've said to Simon this morning, look, it goes massively against my personal and professional grain to get people in trouble when they're my clients. So in the same way that, you know, when I was really hard put under cross -- you know, when we were in the March 25th meeting and there were serious questions coming out, you know, we're not about to say, "Well, we haven't got anywhere because Post Office have been farting about". So, you know, we don't want to dump Simon in it with his boss's boss but we're going to have to be fair, reasonable and accurate on what's caused the delays.

**IAN HENDERSON:** Yeah.

**RON WARMINGTON:** You know, and -- well, a massive increase in the number of cases and in the complexity encountered.

**IAN HENDERSON:** But also the bloody timing. You know, we didn't have cut-off until the end of February.

**RON WARMINGTON:** February. Yeah exactly. Yeah.

**IAN HENDERSON:** But -- all right. Well, we'll just have to wait and see. Just I've got a few other things that I need to do but --

RON WARMINGTON: Yeah.

IAN HENDERSON: -- I obviously don't want to miss the call.

RON WARMINGTON: Well, no, I can't afford to have you miss the call because this is -- you know, you're much better at this stuff than I am and it's bleeding dangerous for any one of us to be -- you know, we just -- it's just going to split us apart if we have meetings like this with only one of us present. It's just not on.

IAN HENDERSON: Yeah.

RON WARMINGTON: So it's not good.

IAN HENDERSON: Okay. Well, as soon as I hear anything, I'll call you and if you can do the same, give me a shout.

RON WARMINGTON: Of course I will. All right.

IAN HENDERSON: All right.

RON WARMINGTON: Oh, okay. I think I'm ready for bed.

IAN HENDERSON: Yeah. Oh, and -- sorry, I mean, one thing we didn't challenge Simon on was his bloody stupid four questions. Have you raised that with him at all?

RON WARMINGTON: Yeah, I had a long conversation with him this morning, not least about the reduction to two to three cases.

IAN HENDERSON: Yeah.

RON WARMINGTON: And the fact that, you know, we would never, ever put ourselves up as qualified to judge whether there's been a miscarriage of justice.

IAN HENDERSON: Yeah.

**RON WARMINGTON:** If we find anything which might be germane to that consideration, that sort of thought process, we are committed to report it to them and we have done.

**IAN HENDERSON:** And I understand that point.

**RON WARMINGTON:** Yeah, but I said that for you to restrict our input to just those issues relating to the software is itself, I think, very misleading and inappropriate and therefore I would have to reject that, although I'm, you know, probably more prepared than Ian is to answer the direct question and, to the best of my ability, that doesn't make the question a fair, correct and reasonable one. So I told him that the questions he's asked are just un-- are just inappropriate.

**IAN HENDERSON:** There's a note just come in from Susan:

"Can we do a call at 4.30?"

**RON WARMINGTON:** Okay, that's arrived more quicker than mine has. Okay. In the meantime, I have made arrangements to come up to London for the 2.00 meeting which is not going to be held now, so I shall probably arrive later then.

**IAN HENDERSON:** Okay. So I'll say we can do this call at 4.30.

**RON WARMINGTON:** Yeah, but I haven't got it yet. Yeah, yeah.

**IAN HENDERSON:** I'll reply on behalf of both of us.

**RON WARMINGTON:** We can. Oh, there we go. Got it. Got it, got it, got it. "Had a good conversation with Paula. Some issues (unclear) views on. Can we do a call at 4.30." Yeah, okay.

**IAN HENDERSON:** Yeah. Okay.

RON WARMINGTON: Yeah?

IAN HENDERSON: Thanks.

RON WARMINGTON: Fine. (Pause)

(Recording ends)