

The Post Office Horizon IT Inquiry

16 January 2024

1 Tuesday, 16 January 2024

2 (10.00 am)

3 MR BLAKE: Good morning, sir, can you see and hear me?

4 SIR WYN WILLIAMS: Yes, I can, thank you very much.

5 MR BEER: Sir, we may have a small technical issue with the  
6 transcription service -- no, it's been fixed, wonderful.

7 SIR WYN WILLIAMS: Yes, that's fine.

8 MR BLAKE: Thank you, sir. This morning we're going to hear  
9 from Ms Sangha.

10 RAJBINDER SANGHA (sworn)

11 Questioned by MR BLAKE

12 MR BLAKE: Thank you very much. Can you give your full  
13 name, please?

14 A. Yes, it's Rajbinder Sangha.

15 Q. Thank you very much, Ms Sangha. You should have in  
16 front of you a bundle that contains a witness statement  
17 behind the first tab, that witness statement has the  
18 unique reference of WITN10300100. Is it dated  
19 20 December 2023?

20 A. Yes, it is.

21 Q. Thank you. Can I ask you to turn to the final page,  
22 page 11. Can you see a signature there?

23 A. Yes.

24 Q. Is that your signature?

25 A. It is.

1

1 A. Correct.

2 Q. Thank you. You joined Fujitsu in 2010, July 2010?

3 A. Yes, that's correct.

4 Q. You were part of the Fraud and Litigation Support  
5 Office?

6 A. Yes.

7 Q. You held the role of Fraud and Litigation Support  
8 Officer?

9 A. Yes.

10 Q. You took some leave in 2016 and rejoined in 2017 as part  
11 of the Release Management Department; is that correct?

12 A. That's correct.

13 Q. Thank you. You stayed in that role until the present  
14 day?

15 A. Yes.

16 Q. Today we're going to be focusing on the period 2010 to  
17 2016, so the period where you were part of the Fraud and  
18 Litigation Support Office. You, as part of that job,  
19 processed audit data and extracted audit data --

20 A. Correct.

21 Q. -- for what we know as ARQ requests --

22 A. Yes.

23 Q. -- or sometimes referred to as ARQ requests?

24 A. Yes.

25 Q. Can you assist us with very briefly explaining what

3

1 Q. Can you confirm that that statement is true to the best  
2 of your knowledge and belief?

3 A. Yes, I can.

4 Q. Thank you very much. That statement will be published  
5 on the Inquiry's website and anything I'm asking you  
6 today will be supplementary to that. I think we see you  
7 in some documents as Rajbinder Bains; is that right?

8 A. That's correct, yes.

9 Q. Was that your maiden name?

10 A. It was, yes.

11 Q. Thank you. You currently work at Fujitsu?

12 A. Yes.

13 Q. Before joining Fujitsu, you graduate from university  
14 with a BSc in information systems in 2005; is that  
15 right?

16 A. Yes, that's correct.

17 Q. Thank you. You held a number of customer services and  
18 administrative roles at various companies before joining  
19 Fujitsu --

20 A. Yes.

21 Q. -- and that included Customer Service Liaison Officer at  
22 Dell --

23 A. Yes.

24 Q. -- and a senior administrator at a Hewlett Packard  
25 company?

2

1 an ARQ or ARQ request was?

2 A. An ARQ request was a record of transactions that had  
3 taken place over the counter at different branches.

4 Q. Is it held at Fujitsu as part of Fujitsu's records?

5 A. Yes.

6 Q. What was your job in relation to that?

7 A. My job was to process the requests that we received from  
8 Post Office, so just extract the data and then send it  
9 back to Post Office.

10 Q. Can we please look at FUJ00232107. This is an email  
11 from 2013. If we turn to the third page, we can see the  
12 background to this. It seems as though there's been  
13 a question about the amount of data that is archived.  
14 I think this particular email relates to  
15 an investigation that is, at that time, going on by  
16 Detica.

17 If we turn to the first page, you set out there the  
18 contractual limits to ARQ requests; is that right?

19 A. Yes, that's correct.

20 Q. So can you please explain to us what the difference  
21 between those three figures are in that email?

22 A. So this would have been information that I would have  
23 got from senior members of the team, because I was  
24 actually -- I was not involved in how many ARQs were set  
25 *per se*, so obviously I've gone back -- I've gone back on

4

1 this email to say that in terms of ARQs we would have  
2 720, for litigation it would be 250.  
3 **Q.** So am I right to distinguish those two: ARQs would be,  
4 the first line, for some other purpose than  
5 litigation --  
6 **A.** Yes.  
7 **Q.** -- perhaps some sort of disciplinary investigation or  
8 something along those lines, or what might that  
9 typically be?  
10 **A.** I can't remember. I can't remember.  
11 **Q.** Okay. Over time I think you became involved in other  
12 tasks.  
13 **A.** Correct.  
14 **Q.** You described in your witness statement maintaining  
15 a database of user permissions and processing security  
16 check applications as well.  
17 **A.** Correct.  
18 **Q.** You have also described working on reconciliation?  
19 **A.** Yes.  
20 **Q.** Can you assist us with what you meant by that?  
21 **A.** So reconciliation was a report that we would run every  
22 morning for transactions that not -- had not completed  
23 over the counter, so our role was to investigate why  
24 these -- raise calls and investigate why these  
25 transactions hadn't completed.

5

1 **A.** No.  
2 **Q.** You describe there are two people in your team?  
3 **A.** Correct.  
4 **Q.** Are you in the same room, is it a small room, a large  
5 room?  
6 **A.** It's a small secure room, so we would only have access  
7 to that room.  
8 **Q.** So there are three of you, all had access to a secure  
9 single room --  
10 **A.** Yes.  
11 **Q.** -- working together in that room. Where was that  
12 office?  
13 **A.** It was based in Bracknell.  
14 **Q.** In Bracknell. I think we will see some emails about  
15 people on different floors, where were you in relation  
16 to, say, the engineers or those who are working on --  
17 **A.** So I would be based on the fourth floor and then we had  
18 another team called the SSC and they were based on sixth  
19 floor.  
20 **Q.** Thank you. We have seen in some documents somebody  
21 called Gareth Jenkins, who we've heard a great deal  
22 about --  
23 **A.** Yes.  
24 **Q.** -- being described as "Expert Litigation Support". Is  
25 that a description that you're familiar with at all?

7

1 **Q.** There were other tasks that members of your team were  
2 involved in. You've described those as providing  
3 Fujitsu Helpdesk logs and also providing witness  
4 statements in court cases; is that right?  
5 **A.** Correct.  
6 **Q.** Can you assist us, who were the members of your team?  
7 **A.** So the two people I worked with were Penelope Thomas and  
8 Andrew Dunks.  
9 **Q.** Can you assist us with what their roles or titles were?  
10 **A.** I think their titles were the same. The roles were --  
11 so Andy provided ARQ requests -- he processed ARQ  
12 requests, he provided Helpdesk calls and also witness  
13 statements; and Penelope was the same minus the Helpdesk  
14 calls, so she processed ARQ requests and provided  
15 witness statements.  
16 **Q.** Thank you. I'm just going to stop you there briefly.  
17 Sir, I don't know if you're hearing any feedback at  
18 all, we have a little internal noise in this room, I'm  
19 just wondering if it's affecting --  
20 **SIR WYN WILLIAMS:** It's not coming through to me and, even  
21 allowing for my growing age, Mr Blake, it's -- if there  
22 is a noise, I can't hear it.  
23 **MR BLAKE:** Thank you. I'm told it's the monitor next to the  
24 transcriber.  
25 Ms Bains, does it affect you at all?

6

1 Sorry, because it's being transcribed ...  
2 **A.** No.  
3 **Q.** Did somebody like Gareth Jenkins have a different role  
4 in relation to the team to yourself?  
5 **A.** Not that I'm aware of, no, I don't remember.  
6 **Q.** Can we please look at FUJ00226099, please. Thank you.  
7 This is an email from Penny Thomas to yourself, and you  
8 can see there it's headed "Expert Litigation Support".  
9 **A.** Yes.  
10 **Q.** She seems to be having a conversation or sets out  
11 a conversation between herself and somebody called  
12 Matthew Church; do you know who Matthew Church was?  
13 **A.** I don't remember, sorry.  
14 **Q.** She says there:  
15 "Hi Matthew, I'm in the process of putting together  
16 the charges for Gareth Jenkins for the Expert Litigation  
17 Support he provides. Could you please advise what you  
18 charge as an hourly rate?  
19 "This is to cover February activities."  
20 His response is:  
21 "His daily rate is £1,199 divided by 7.4 hours to  
22 get the hourly rate of £162.02."  
23 So that term "expert litigation support" was not  
24 something you were familiar with?  
25 **A.** No.

8

1 **Q.** Can we look at one more document, it's FUJ00226107.  
 2 This is again an email from yourself, the subject here  
 3 is "Expert Litigation Support". There are various  
 4 figures given. So we've heard about a case, the case of  
 5 Mr Ishaq. It sets out there the expenses for Gareth  
 6 Jenkins for the Ishaq case. Then it says:  
 7 "Gareth booked 31 hours for Expert Litigation  
 8 Support, his time was expended on the following:  
 9 "Predominantly this is for the Ishaq case, but also  
 10 related to the Second Sight investigation and other  
 11 cases, eg Sefton and Nield, Dixon and Brown."  
 12 It sets out there a cost for March of £5,291. What  
 13 was your role in relation to the fees of Mr Jenkins?  
 14 **A.** I had no role in the fees. Basically this information  
 15 would have been sent to me and then my role was just to  
 16 send it on to Post Office.  
 17 **Q.** Who would it have been sent to you by?  
 18 **A.** It would have been -- so this information -- the  
 19 information on here would have been sent from Gareth  
 20 himself to myself.  
 21 **Q.** Are you able to assist us with typical fees per month  
 22 that might have been incurred by Mr Jenkins?  
 23 **A.** No, I can't remember.  
 24 **Q.** I'm going to move on to the topic of your knowledge of  
 25 issues with the Horizon system. I'm going to begin with

9

1 **Q.** The completeness of the data extracts provided is  
 2 assumed, and witness statements state as much (see last  
 3 page)."  
 4 We'll get onto that last page where we see a form of  
 5 words that's used in witness statements:  
 6 "The service has worked by providing extracts of  
 7 Riposte of Message Store data only."  
 8 Then it says:  
 9 "This service (worth the best part of the annual  
 10 £850,000 security revenue ...)"  
 11 That says, "PS", it looks as though that's inserted  
 12 by Pete Sewell:  
 13 "... will remain to 2015 and beyond."  
 14 Were you aware of the financial significance of the  
 15 ARQ service --  
 16 **A.** No.  
 17 **Q.** -- to Fujitsu?  
 18 **A.** No, I wasn't.  
 19 **Q.** Were you made aware when you joined the business of its  
 20 significance?  
 21 **A.** Yes, I was.  
 22 **Q.** Yes. There's then identified in this document a problem  
 23 and it quotes from the number of a PEAK. Are you aware  
 24 what a PEAK is?  
 25 **A.** Yes.

11

1 when you joined. Can we start by looking at  
 2 FUJ00122588, please. Thank you very much.  
 3 This is a document that pre-dates your joining the  
 4 team, so it's a 2008 document. It's unlikely that you  
 5 saw it but, if you did see it, please do let us know.  
 6 **A.** No.  
 7 **Q.** I'm just going to take you through to see what kind of  
 8 information was passed on to you when you joined the  
 9 team. If we look at the first page, it's called "HNG-X  
 10 CP -- Strengthen the HNG-X Audit Solution, and enable  
 11 analysis of Counter Event messages". Are you able to  
 12 assist us with what "HNG-X CP" means? I'm able to say  
 13 that HNG-X is what we know as Horizon Online. Does that  
 14 assist you at all? It seems to be a proposal.  
 15 **A.** Yeah, it's -- yeah, um, I can't remember, sorry.  
 16 **Q.** If we start with a description of the audit system and  
 17 ARQ service, it says:  
 18 "We are contractually applied to support the  
 19 Prosecution Support Service via CS, and provide  
 20 historical extracts of data from the audit archive  
 21 (7 years of data), used in legal proceedings often to  
 22 prove accusations of fraud against postmasters."  
 23 Pausing there, was that your understanding of the  
 24 contractual position?  
 25 **A.** Yes.

10

1 **Q.** We've looked at those?  
 2 **A.** Yes, I --  
 3 **Q.** Thank you. So it has:  
 4 "PC0152376 highlighted that in certain error  
 5 conditions in the EOD process Riposte cannot be relied  
 6 upon to write a consistent set of messages to the local  
 7 store."  
 8 Just pausing there, I wonder whether we can get up  
 9 PC0152376, it's FUJ00154684. We'll just have a quick  
 10 look at the underlying PEAK that's referred to here. It  
 11 can either be alongside or separate.  
 12 This is the first page. Could we look at about  
 13 halfway down the page, if we could have a look at the  
 14 words, if we scroll down slightly. It's refers to a  
 15 member of the NBSC -- scroll down a little, thank you:  
 16 "Ibrahim from the NBSC [that's the National Business  
 17 Support Centre] has asked that an issue be investigated  
 18 by our software team regarding discrepancies still  
 19 showing when the MIS stock unit is rolled to clear the  
 20 local suspense account."  
 21 I'm not going to ask you in any detail about this  
 22 particular problem but it relates to discrepancies  
 23 showing. If we turn over to page 3, please, there's  
 24 an entry on page 3 from Mr Barnes, who we are going to  
 25 hear from tomorrow, 2 January 2008. So this is two

12

1 years before you joined the team. He says, as follows:  
 2 "The fact that EPOSS code is not resilient to errors  
 3 is endemic. There seems little point fixing it in this  
 4 one particular case because there will be many others to  
 5 catch you out. For example when I tried to balance with  
 6 CABSPProcess running I found that declaring cash failed  
 7 with the same sort of error message!  
 8 "It may be worth passing on the general message to  
 9 the HNG-X team that in many cases code should always try  
 10 and exit gracefully after an error and not just blunder  
 11 on regardless."  
 12 Just pausing there, were you made aware when you  
 13 joined the team, of issues with, for example, the EPOSS  
 14 code?  
 15 **A.** No, I wasn't.  
 16 **Q.** Could we go back to the document we were just looking  
 17 at, that's FUJ00122588, please. Were you aware with  
 18 general issues regarding data integrity and concerns  
 19 about the integrity of, for example, ARQ data?  
 20 **A.** No, I wouldn't have been because it wasn't part of my  
 21 role and, if there was issues within the system, it  
 22 would be dealt with by higher members of the team, so  
 23 members that had more knowledge of the system.  
 24 **Q.** So sticking where we are, let's move to the second  
 25 bullet point under "Problem". It says:

13

1 **Q.** If we go over the page, please. Under "Benefit/Risk",  
 2 if we scroll down slightly, it says as follows:  
 3 "If we cannot better identify where data integrity  
 4 can or cannot be guaranteed, then we are in breach of  
 5 contract and may:  
 6 "Be fined heavily [or]  
 7 "Not be able to offer the ARQ service, or will  
 8 undermine confidence in the service."  
 9 Then scrolling down, we have that witness statement  
 10 extract. We will see in due course this becomes part of  
 11 or is included in a *pro forma* type witness statement.  
 12 **A.** Yes.  
 13 **Q.** It's a form of words that says, as follows:  
 14 "An audit of all information handled by the TMS  
 15 [that's Transaction Management Service] is taken daily  
 16 by copying all new messages to archive media",  
 17 et cetera, and it details the process that's involved.  
 18 Just pausing there on this particular document, do  
 19 you think, at the time that you joined the ARQ team, it  
 20 would have been helpful to have known about concerns  
 21 about the integrity of the ARQ system?  
 22 **A.** Yes.  
 23 **Q.** Yes. You joined then in July 2010. Could we please  
 24 move to FUJ00122925, please. This is 14 July 2010 and  
 25 you are sent by Penny Thomas a standard witness

15

1 "This particular issue has been fixed ... but it is  
 2 very probable that similar problems exist in the Horizon  
 3 system.  
 4 "Therefore the process of providing data now needs  
 5 to include the extraction and cross-checking of event  
 6 data to help identify where data integrity might be  
 7 compromised.  
 8 "The statements currently asserted in witness  
 9 statement cannot be guaranteed in all cases (even after  
 10 this CP) ... but this CP seeks to strengthen the process  
 11 and allow us to reliably identify where the assertion  
 12 can or cannot be made."  
 13 Then it says:  
 14 "Current Process  
 15 "Many manual steps, requiring great care and skill  
 16 from individual resources, obvious potential for human  
 17 error.  
 18 "Data distributed or transferred over too many  
 19 platforms/media: inherently insecure.  
 20 "Tactical solution [which has] introduced further  
 21 manual steps."  
 22 Were you aware, as somebody who was involved in that  
 23 overall ARQ process, that there had been a number of  
 24 manual steps to work around certain problems?  
 25 **A.** No, I wasn't.

14

1 statement for you to read through. Now, was this very  
 2 early on in your time, was this reading in to the job  
 3 or --  
 4 **A.** Yes, it was. It was reading into the job and  
 5 understanding what roles we were undertaking.  
 6 **Q.** We can have a look at that standard witness statement.  
 7 That's at FUJ00122926. Thank you very much. This is  
 8 the attachment to that email.  
 9 **A.** Correct.  
 10 **Q.** It doesn't currently have anybody's name on it. It's  
 11 a *pro forma* standard witness statement that says, as  
 12 follows, it says:  
 13 "I am authorised by Fujitsu Services to undertake  
 14 extractions of audit archive data and to obtain  
 15 information regarding system transactions recorded on  
 16 the Horizon system."  
 17 Scrolling down, it says:  
 18 "Horizon's documented procedures stipulate how the  
 19 Horizon system operates, and while I am not involved  
 20 with any of the technical aspects of the Horizon system,  
 21 these documented processes allow me to provide a general  
 22 overview."  
 23 Was it your understanding that this was to be used  
 24 by those who weren't, for example, the engineers, like  
 25 Gareth Jenkins, so didn't have quite that technical

16

1 understanding, but who nevertheless provided --  
 2 **A.** Correct.  
 3 **Q.** -- some evidence in criminal proceedings?  
 4 **A.** Yes, correct.  
 5 **Q.** Could we scroll over to page 3., and that second  
 6 paragraph on page 3. That's the form of words I just  
 7 took you to in that earlier 2008 document. Then if we  
 8 go over the page again, there is, if we scroll down  
 9 a little bit, it sets out the various controls that  
 10 apply to the audit extraction process. For example, it  
 11 says at 1:  
 12 "Extractions can only be made through the [audit  
 13 workstations] which exist at Fujitsu Services", and it  
 14 gives the address.  
 15 Stopping there, were you part of that extraction  
 16 process?  
 17 **A.** I was.  
 18 **Q.** Did you extract?  
 19 **A.** Yes.  
 20 **Q.** Number 2:  
 21 "Logical access to the [audit workstation] and its  
 22 functionality is managed in accordance with certain  
 23 principles. This includes dedicated logins, password  
 24 control and use of Microsoft Windows NT security  
 25 features."

17

1 then you give the Post Office branch details]."  
 2 That's effectively producing the ARQ data for the  
 3 court; is that your understanding?  
 4 **A.** Yes, that's correct, yeah.  
 5 **Q.** Can we scroll down to the final substantive page, it's  
 6 page 7. Thank you very much. It's that paragraph  
 7 that's currently on the screen, the bottom paragraph  
 8 there, this is another part of that standard witness  
 9 statement. It's a form of words that we'll see in  
 10 a number of other witness statements. It says, as  
 11 follows:  
 12 "There is no reason to believe that the information  
 13 in this statement is inaccurate because of the improper  
 14 use of the system. To the best of my knowledge and  
 15 belief, at all material times the system was operating  
 16 properly, or if not, any respect in which it was not  
 17 operating properly, or was out of operation was not such  
 18 as to effect the information held within it."  
 19 Did that paragraph at the time cause you any  
 20 concern?  
 21 **A.** No.  
 22 **Q.** No. Does it now cause you any concern?  
 23 **A.** No, it doesn't, no.  
 24 **Q.** It doesn't cause you any concern? We're now going to  
 25 look at an issue in 2010, so the year you joined, with

19

1 So, in order to extract the data, there were certain  
 2 security controls in place to ensure that there were  
 3 sufficient controls on that data.  
 4 **A.** Correct, yes.  
 5 **Q.** "3. All extractions are logged on the [audit  
 6 workstation] and supported by documented Audit Record  
 7 Queries, authorised by nominated persons within the Post  
 8 Office. This log can be scrutinised on the [audit  
 9 workstation].  
 10 "4. Extractions are only made by authorised  
 11 individuals", et cetera.  
 12 So this is essentially reassuring a court as to the  
 13 integrity of the data because it can be accessed by  
 14 those who don't have a login, for example?  
 15 **A.** Yes.  
 16 **Q.** If we go over the page, please, to page 5. If we scroll  
 17 down three-quarters of the way, we can see where  
 18 a particular ARQ number is inserted. So this is the  
 19 *pro forma* part that would be filled out by the person  
 20 completing that statement:  
 21 "ARQ (NUMBER) ..."  
 22 I think that means into insert the number there.  
 23 **A.** Yes.  
 24 **Q.** "... was received on [insert the date] and asked for  
 25 information in connection with the Post Office at [and

18

1 the ARQ data. Could we look at FUJ00172183. The  
 2 document we're going to look at is another PEAK and  
 3 we're going to look at an entry that begins on  
 4 21 June 2010, so very soon before you joined -- it's  
 5 FUJ00172183 -- and it covers the period when you did  
 6 join subsequently.  
 7 **A.** Okay.  
 8 **Q.** But we'll start with the entry on 21 June 2010. Thank  
 9 you. So we can see there it's PC0200468. There's  
 10 a summary at the top, perhaps I will read that out, but  
 11 we will get to that. That's further down in the log.  
 12 It says:  
 13 "From Penny -- In a nutshell HNG-X [that's Horizon  
 14 Online] application is not removing duplicate  
 15 transactions (which may have been recorded twice on the  
 16 audit server) and they are appearing in the ARQ returns.  
 17 For the old Horizon application Riposte automatically  
 18 removed duplicate entries. An initial analysis shows  
 19 that one third of all ARQ returns (since the new  
 20 application has been in play) have duplicated  
 21 transactions."  
 22 If we scroll down, please, to the second entry in  
 23 this log. We have an entry from Penny Thomas. She  
 24 says:  
 25 "While performing an audit retrieval for branch [and

20

1 it gives the branch details] duplicate transactions have  
2 been found [and it gives the date]. Initial analysis  
3 shows that duplicate records are held in 2 different  
4 audited TMS files."

5 Scrolling down the page, the final entry on the page  
6 from Mr Barnes, he says as follows, on 22 June:

7 "The way it works is that it processes all the  
8 results in a given file building up an internal table of  
9 transactions consequence for that file. Then at the  
10 very end of the processing the file it dumps the  
11 internal table to [and gives it details of the table].  
12 It does not cross-check the transactions in one file  
13 against another file."

14 He outlines two solutions that are possible.  
15 There's an "easy solution":

16 "As each transaction is processed a check is made  
17 ... and if it's already there the transaction is ignored  
18 writing a warning to the query logged. The problem with  
19 this solution is that a query needs to be made to the  
20 database for every transaction."

21 Then he describes the "more difficult solution", if  
22 we go over the page, please:

23 "The internal table which at the moment is built up  
24 on a per file basis is changed to being built up on  
25 a per query basis. The check for duplicate transactions

21

1 [Horizon Online] and has not yet fully bedded down and  
2 so it is likely to change as problems such as this one  
3 are spotted."

4 Just pausing there, on joining the team -- and  
5 you've said it was a small team, three people -- were  
6 you not made aware of issues such as this that could  
7 affect the reliability of information presented to  
8 court?

9 **A.** No, I wasn't made aware.  
10 **Q.** If we scroll down, let's look at the entry of 23 June  
11 from Penny Thomas, it's just there. It says:

12 "Initial analysis of all ARQ returns since the  
13 [Horizon Online] application has been implemented  
14 identifies approximately one third (of all returns) have  
15 duplicate entries. This is now extremely urgent."

16 Scroll down, please, towards the bottom of the page,  
17 an entry of 7 July 2010. It's the bottom entry that's  
18 currently on screen, 7 July 2010, and it says as  
19 follows -- it says that it's been fixed, essentially,  
20 7 July.

21 Then if we keep on going down, scrolling down, over  
22 the page, 30 July. It seems as though there's, in fact,  
23 a testing of the fix, 30 July. It says there, the entry  
24 from Sheila Bamber, it says:

25 "This PEAK has been tested in LST and fix will be

23

1 is then done within the internal table. This is a much  
2 more thorough approach but will take much more work."

3 Then there's an entry on 22 June 2010 and it's  
4 outlining the details of a fix to this problem. If we  
5 scroll down, it describes the impact on the user of the  
6 issue. It's about halfway down this page. "Impact on  
7 user", it's almost at the bottom of this page. It says:

8 "Occasionally duplicate transactions are listed in  
9 the spreadsheets produced and presented to court for  
10 prosecution cases. These can give the defence teams  
11 ground to question the evidence."

12 Then it says:

13 "Have relevant KELs been created or updated?"

14 So a KEL -- are you aware of a Known Error Log.

15 **A.** Yes, I am.

16 **Q.** It says:

17 "No [Known Error Logs] have been created for this  
18 since we intend to fully resolve the issue shortly."

19 If we scroll down, there are risks that are outlined  
20 of the fix. It says:

21 "If we do not fix this problem our spreadsheets  
22 present in court are liable to be brought into doubt if  
23 duplicate transactions are spotted."

24 If we go over the page, please. It says:

25 "QueryDLL.dll is a recent component introduced for

22

1 read with Release 2 data centre."

2 Down the bottom of the page, an entry from Penny  
3 Thomas, 1 September 2010:

4 "Fix successfully deployed ..."

5 So it seems as though that PEAK, that incident log,  
6 was open from before you joined and wasn't closed until  
7 1 September and wasn't successfully fixed until  
8 1 September --

9 **A.** Correct.

10 **Q.** -- so after you had joined the team?

11 **A.** Yes.

12 **Q.** Does it cause you any concern that you weren't aware of  
13 that kind of thing on joining and --

14 **A.** Yeah, it does because, obviously, I didn't realise that  
15 the data -- that there was these issues with the --

16 **Q.** Yes. Can we please have a look at FUJ00172047. This is  
17 an email chain from Penny Thomas. You are copied in at  
18 this stage and this is 21 July 2010. Its title is  
19 PC0200468. So it does certainly as though you were  
20 copied into conversations about this particular issue.  
21 Do you agree with that?

22 **A.** Yes, I do.

23 **Q.** Could we, please, look at page 10. It's a discussion of  
24 the issue we've just looked at, from Penny Thomas to Pat  
25 Lywood are you able to assist us? I think it says at

24

1 the top there "Service Implementation Manager"; was Pat  
 2 Lywood someone who you knew?  
 3 **A.** No.  
 4 **Q.** If we look at that final entry, Penny Thomas says as  
 5 follows, at the bottom entry:  
 6 "We have a very significant problem which has been  
 7 recorded [and it gives the PEAK details]. In a nutshell  
 8 the [Horizon Online] application is not removing  
 9 duplicate transactions (which may have been recorded  
 10 twice on the Audit Server) and they are appearing in the  
 11 ARQ returns. For the old Horizon application Riposte  
 12 automatically removed duplicate entries. An initial  
 13 analysis shows that one third of all ARQ returns (since  
 14 the new application has been in play) have duplicated  
 15 transactions."  
 16 That's the entry, effectively, taken from the  
 17 PEAK --  
 18 **A.** Yes.  
 19 **Q.** -- or later effectively inserted into the PEAK. Could  
 20 we look at page 9, please. You're not, at this stage,  
 21 copied in. This was a chain that was ultimately copied  
 22 to you but you're not part of this discussion. If we  
 23 look at the bottom of page 9 there's an email from  
 24 Graham Welsh to a number of people at Fujitsu. Looking  
 25 at their names, they all seem to be involved in the  
 26

1 **Q.** But it wasn't at the time or wasn't seen in your team as  
 2 a significant issue --  
 3 **A.** Yes.  
 4 **Q.** -- or not sufficiently prominent to draw to your  
 5 attention?  
 6 **A.** Yeah.  
 7 **Q.** Could we look at the bottom of page 6 and into page 7,  
 8 please. There's an email from Andrew Mansfield. He  
 9 says as follows:  
 10 "Gerald has produced a fix for Release 1 and it is  
 11 ready to go.  
 12 "He has added an impact statement to the PEAK that  
 13 includes a brief statement on testing: an audit request  
 14 should be performed that retrieves and processes TMS  
 15 files containing duplicate transactions. It should be  
 16 confirmed that the duplicate transactions have been  
 17 removed from the final spreadsheet generated by the  
 18 audit application.  
 19 "The PEAK is currently with RMF for targeting."  
 20 He says:  
 21 "There has been discussion of a possible workaround.  
 22 This involves modifying the audit queries so that the  
 23 message numbers are included in the output to the  
 24 spreadsheets (currently they are not). This would allow  
 25 the duplicate messages to be identified and removed by  
 26

1 technical aspects of Horizon.  
 2 Sorry, it's the bottom of page 8. The email itself  
 3 is on the top of page 9 as we can see. He says:  
 4 "Please see below attached [for your information].  
 5 In essence we have a problem with the ARQ extraction  
 6 tool. Under Horizon this would inhibit the duplicate  
 7 transactions held for the audit server and thus supply  
 8 evidence for court etc without duplicated records.  
 9 "However the [Horizon Online] tool does not and thus  
 10 duplicate records that cannot be differentiated are  
 11 supplied as evidence. Thus could allow for legal  
 12 challenge to the integrity of the system."  
 13 Now, you don't have recollection of discussing this  
 14 issue, you're at least on the chain of this issue. Why  
 15 do you think it is that the significance of this was not  
 16 more prominent in your three-person team?  
 17 **A.** I think this was dealt with senior members of the team  
 18 that obviously had more knowledge of the system --  
 19 **Q.** But you are one of those people who is extracting --  
 20 **A.** Correct.  
 21 **Q.** -- the ARQ data. It says there that there is a problem  
 22 with the ARQ extraction tool and could allow for a legal  
 23 challenge to integrity of the system. Looking back at  
 24 it, does it seem to you to be quite a significant issue?  
 25 **A.** Yes, looking back at it now, yes, it is.  
 26

1 running a macro on the final spreadsheet generated by  
 2 the application."  
 3 He then says, if we could scroll down slightly:  
 4 "Penny Thomas is in discussion with the Post Office  
 5 over whether this workaround is acceptable in the  
 6 short-term."  
 7 Could we scroll up, please, to page 5 -- at the  
 8 bottom of page 5, thank you, if we could stop there. So  
 9 we have a message from Penny Thomas saying that:  
 10 "[The Post Office] has gone to [Post Office Legal]  
 11 for guidance and further returns have been identified  
 12 this morning as bound for court."  
 13 So it seems as though ARQ data is heading to court  
 14 whilst this issue has already been identified. Then we  
 15 have a response from Graham Welsh, and he says:  
 16 "[Please see below] from Penny. I understand that  
 17 there are more court cases pending and whilst the  
 18 briefing to the investigation has taken place they are  
 19 coming back requesting help due to the level of activity  
 20 and nervousness regarding the current workaround."  
 21 In terms of workaround, as somebody who was  
 22 extracting the data, were you performing this  
 23 workaround? Were you, for example, manually checking  
 24 certain things due to this kind of issue?  
 25 **A.** I can't remember.  
 26

1 Q. I mean, presumably you did more than just press a button  
2 and the ARQ data comes up on your screen.  
3 A. So my role was to extract the data. So, basically,  
4 enter in the branch code, enter a date range and that  
5 would extract the information. That was my  
6 responsibility.  
7 Q. So you weren't involved in the actual checking of the  
8 underlying data?  
9 A. No, I was not there -- I wasn't -- my role was not to  
10 analyse the data.  
11 Q. Who was it that would perform things like these  
12 workarounds that we see here? So something like  
13 checking for duplication within the --  
14 A. So part of the process would have been that, when we  
15 extracted the data, another member of the team would  
16 ensure that whatever had been requested was included in  
17 the -- is what was produced.  
18 Q. You say another member of the team. There were three of  
19 you?  
20 A. So yeah, it would either have been Andy or Penny.  
21 Q. Can we, please, look at page 4, if we scroll up. At the  
22 bottom of page 4, from somebody called Tom Lillywhite,  
23 who is the Principal Security Consultant. He says:  
24 "Have just read this ... suggest keeping Penny in  
25 the loop ... she knows just how nervous the customer

29

1 chest? Was she not somebody who discussed issues that  
2 were actually affecting the very job that you were  
3 carrying out?  
4 A. Sorry, can you repeat that question again? Sorry.  
5 Q. I think what we've identified is that there is a serious  
6 issue that's identified in various emails. If we look  
7 at the first email, it seems to have at least been  
8 copied to you but I think your evidence is that you  
9 don't remember any discussion about it and, really, my  
10 question is why didn't you have a conversation with  
11 Penny Thomas? Was there something about Penny Thomas  
12 that made it unlikely that you would that have  
13 a conversation about it?  
14 A. I don't recall having a conversation.  
15 Q. In terms of Penny Thomas, what was your relationship?  
16 A. My relationship with Penny was, if there was something  
17 that I was unsure of in terms of the ARQ requests,  
18 I would approach her.  
19 Q. Yes. There were three of you in the room. Did you sit  
20 in silence all day? Did you discuss matters that  
21 affected your work?  
22 A. We discussed things, yes.  
23 Q. Why do you think it is or may be that Penny Thomas  
24 didn't discuss an issue such as this with you?  
25 A. I don't know. I don't know.

31

1 is/will become and may have something to add ..."  
2 At this stage, did you have any interaction with the  
3 Post Office?  
4 A. Apart from processing the requests, that's the only  
5 interaction I had with them.  
6 Q. So you would send something to the Post Office?  
7 A. Yes, yes.  
8 Q. If we have a look at the email above, Mr Welsh says, as  
9 follows, he says:  
10 "The sooner this is resolved the easier the task  
11 will be in managing [Post Office] expectations in this  
12 area while minimising the risk of duplicated effort by  
13 having to reproduce reports already provided."  
14 So it seems as though there is an attempt to avoid  
15 having to reproduce those reports that have already been  
16 provided in, for example, court proceedings?  
17 A. Correct.  
18 Q. Given that you were part of a very small team and you  
19 were part of that ARQ process, does it not strike you as  
20 odd that there wasn't a conversation with, for example,  
21 Penny Thomas about this issue?  
22 A. Penny was a senior member of the team so she dealt with  
23 this -- these kind of issues. But I don't recall having  
24 a conversation, no, being told.  
25 Q. Was she somebody who kept her cards very close to her

30

1 Q. Now, we saw that you received that draft statement early  
2 on in your time at the Post Office, the draft *pro forma*  
3 statement, that we looked at. That was dated or sent to  
4 you on 14 July. We're now on 21 July when this chain is  
5 being sent to you, so not that far after having received  
6 that statement. Did it not cause you any concerns about  
7 the reliability of the statement, the *pro forma*  
8 statement?  
9 A. At the time no because I was not involved in producing  
10 a witness statement for going to court proceedings.  
11 Q. Yes. Does it cause you any concern now?  
12 A. Yes, it does.  
13 Q. Why does it cause you concern now?  
14 A. Because, obviously, we had bugs in the system.  
15 Q. Can we please look at FUJ00225940. This is another  
16 PEAK. Thank you. This is PEAK PC0204310 and it relates  
17 to "duplicate JSN detected", and the summary there, if  
18 we scroll down:  
19 "Support overhead currently 30 incidents in 5 days.  
20 Resolution will mean that any future occurrences will  
21 have a different root cause and require investigation.  
22 Such incidents are currently getting masked by the  
23 volume associated with this PEAK with consequential risk  
24 to the integrity of the audit trail used for litigation  
25 support."

32

1 If we scroll down, please, we have an entry of  
 2 13 September. So a couple of months into the job. It  
 3 says there:  
 4 "Exception raised while processing message event.  
 5 Serious system error."  
 6 Perhaps we could look at page 8, please, and  
 7 a couple of entries on page 8. Thank you. The second  
 8 entry there, 19 October 2010, an entry that says, as  
 9 follows:  
 10 "A new Business Impact has been added:  
 11 "This PEAK will reduce the support overhead because  
 12 it will reduce the number of alerts associated with  
 13 duplicate JSNs. It will also mean that any future  
 14 occurrences will have occurred for a different reason  
 15 and would require investigation. Such incidents are  
 16 currently getting masked by the occurrences associated  
 17 with this PEAK.  
 18 "There is no immediate benefit to the customer other  
 19 than support engineers no longer need to worry about  
 20 these types of alert and can focus on another alerts.  
 21 "Currently this type of error generates a high  
 22 frequency of alerts on a daily basis, masking other  
 23 types of error."  
 24 If we scroll down near the bottom of the page to  
 25 2 November, an entry from Steve Parker. He says as  
 33

1 to this particular problem.  
 2 The subject is "PC0204310 duplicate JSN detected",  
 3 so that's the PEAK that we've just been looking at?  
 4 **A.** Yes.  
 5 **Q.** Mr Parker says:  
 6 "It will be difficult to get the right technical  
 7 people together on this one for a face-to-face  
 8 discussion. My take on it is:  
 9 "1) Risk to support is large. It is impossible for  
 10 support to check all the duplicate JSN events to ensure  
 11 they are the same issues described on", and it gives  
 12 details.  
 13 "2) The 100 [approximately] incidents that support  
 14 have checked all fall into the scenarios described in  
 15 [and that's a particular reference]. These are all safe  
 16 to ignore.  
 17 "3) We risk other parts of the program by trying to  
 18 force through a fix ..."  
 19 I think we've heard during earlier parts of this  
 20 Inquiry things like code regression, or other issues  
 21 with code caused by particular fixes.  
 22 **A.** Yes.  
 23 **Q.** Is that something you're aware of?  
 24 **A.** I'm not aware of it.  
 25 **Q.** As a general principle?  
 35

1 follows:  
 2 "The Business Impact has been updated:  
 3 "Support overhead currently 30 incidents in 5 days.  
 4 Resolution will mean that any future occurrences will  
 5 have a different root cause and will require  
 6 investigation. Such incidents are currently getting  
 7 masked by the volume associated with this PEAK with  
 8 consequential risk to the integrity of the audit trail  
 9 used for litigation support."  
 10 Do you recall this issue?  
 11 **A.** I do.  
 12 **Q.** You do?  
 13 **A.** Yeah.  
 14 **Q.** Why do you recall this issue? What was it about this  
 15 issue that stood out?  
 16 **A.** I just remember being made aware that we had duplicate  
 17 JSNs. In terms of the severity of it, technical  
 18 background, I didn't have that much knowledge of the  
 19 system but I remember being told about this, yeah.  
 20 **Q.** Thank you. I'm going to take you to an email chain,  
 21 it's at FUJ00228770. It's an email chain from  
 22 November 2010. Can we start on page 5, please. We'll  
 23 see your name appear within this email chain, on -- if  
 24 we look at page 5, you're not currently copied in on  
 25 this particular email but this describes the workaround  
 34

1 **A.** Yeah, as a general principle, yeah.  
 2 **Q.** "4) Risk to audit is very small. Should a true  
 3 duplicate JSN slip through then it will be noticed by  
 4 a failure as described [and it gives a reference]. Such  
 5 incidents will still need to be investigated urgently.  
 6 "Pragmatic approach, given the approach, is to  
 7 ignore all duplicate JSN messages in BAL logs until [the  
 8 issue] is resolved ([which is going to be] early next  
 9 year). There is a small risk that by ignoring this  
 10 event we will be missing an issue that needs  
 11 investigation."  
 12 If we look at page 3 at the bottom of page 2 into  
 13 page 3 there is discussion about the workaround that is  
 14 going to take place until the actual resolution of the  
 15 issue. Bottom of page 2 into page 3. It's an email  
 16 from somebody called Sarah Selwyn to Steve Parker and  
 17 others. Is Sarah Selwyn someone familiar to you?  
 18 **A.** I know of her, yeah.  
 19 **Q.** Do you know what her role was at all?  
 20 **A.** I can't remember.  
 21 **Q.** So, thank you. She says as follows:  
 22 "Steve,  
 23 "I agree with your approach as long as any JSN  
 24 duplicates that match the criteria described ... are  
 25 still investigated urgently, as you described below in  
 36

1 item 4."  
2 The second paragraph describes the workaround. She  
3 says:  
4 "What has not been described below is the additional  
5 effort that the existence of duplicates places on the  
6 Litigation Support Team. Until the two fixes relate to  
7 the PEAKs described below are delivered to live, Penny  
8 and team will need to run the macro provided as  
9 a workaround against very spreadsheet generated by the  
10 fast ARQ method to determine if there are any duplicate  
11 spreadsheet rows present. These rows do not include  
12 JSN."

13 Just pausing there, we are going to hear more about  
14 it this week, but can you assist us with what a fast ARQ  
15 was, as opposed to a slow one?

16 **A.** A fast ARQ, what I can recall, is I think we used to put  
17 the date range and the FAD code and click a button and  
18 it would return the data.

19 **Q.** And a slow one would be what, more manual?

20 **A.** Yeah, I think so, yeah.

21 **Q.** Thank you. If we go back to the substantive email,  
22 please. It continues as follows, it says:

23 "If there are any duplicate spreadsheet rows  
24 present, these rows do not include JSN. If there are  
25 duplicates present, then Penny and team run one of the

37

1 April?

2 **A.** Yes.

3 **Q.** Do you recall the first document that I took you to or  
4 second document, the 2008 document about Legacy Horizon  
5 having these manual workarounds which creates risks  
6 workarounds. If we apply those concerns here, can you  
7 see potential risks to this workaround process for audit  
8 data?

9 **A.** Yes, I can see potential risks, yes.

10 **Q.** We've seen those witness statements, for example, that  
11 talk about the security needed, the logins needed, the  
12 special entry to the special room, but if those who are  
13 carrying out the process are themselves carrying out  
14 a more manual process, do you see risks involved in  
15 that?

16 **A.** Yes, yes.

17 **Q.** Then if we go to the first page -- the very first, thank  
18 you very much. You're not copied in here. So you were  
19 copied into the earlier chain but this seems to be the  
20 top of the chain that you don't appear to be copied  
21 into. It's from Penny Thomas and she says:

22 "All

23 "The analysis we have conducted (covering ...)"

24 Sorry, in fact, if we could go over the page, if we  
25 could start on the second page because there's an email

39

1 slow ARQ queries which have been modified to include JSN  
2 in order to determine if the duplicate is a true  
3 duplicate."

4 So it seems as though the workaround involves  
5 looking for duplicate entries and then changing the  
6 process if duplicate entries are found. Is that  
7 something you recall at all?

8 **A.** I -- yeah, I don't recall, sorry.

9 **Q.** If we look at that third paragraph on the page, halfway  
10 through that paragraph, it says:

11 "Penny and team will need to continue manually  
12 running the workaround macro until at least April next  
13 year. The resolution [and it gives it the reference of  
14 the PEAK] delivered 3.20 delivered early next year  
15 should reduce JSN duplicates in any [Horizon Online]  
16 audit analysed but the macro will still need to be run  
17 until [a certain release] just in case the audit being  
18 analysed is", et cetera.

19 So it seems as though Penny Thomas and team -- would  
20 that team involve -- who would that be, "Penny and  
21 team"? Is that your team, is that --

22 **A.** Correct. Penny, myself and Andy.

23 **Q.** So the three of you would need to continually manually  
24 running the workaround macro until April next year. So  
25 a considerable period of time; we're in November until

38

1 from Sarah Selwyn to Penny Thomas, yourself and others.  
2 She says:

3 "Penny and Raj,

4 "Thank you both for your analysis of the business  
5 impact of running the workaround fixes for detection of  
6 JSNs in HNG-X audit."

7 Do you remember carrying out analysis of the  
8 business impact?

9 **A.** I don't.

10 **Q.** Do you think it's likely that you were part of that,  
11 given that she has addressed both of you and said,  
12 "Thank you both for your analysis"?

13 **A.** Yeah, definitely, yeah, I was part of it, yeah.

14 **Q.** She says --

15 **SIR WYN WILLIAMS:** Right, I was just going to say it wasn't  
16 on my screen, Mr Blake, but it popped up as I was saying  
17 it. Sorry.

18 **MR BLAKE:** Thank you, sir.

19 So it's an email from Sarah Selwyn, who says:

20 "Penny and Raj,

21 "Thank you both of your analysis of the business  
22 impact of running the workaround fixes for detection of  
23 JSNs in HNG-X audit.

24 "Penny, the permanent fixes to the audit workstation  
25 for JSN detection and analysis will be supplied in

40

1 release 4.37 ... which is currently expected to be out  
2 of LST on 04/05/2011. There is no live data predicted  
3 yet for [the release] but usually this would follow  
4 within a few days. You should expect to be running the  
5 workaround solution until May 2011."  
6 That's similar detail to the detail we've just seen.  
7 Then if we go, please, to the first page, which is  
8 where Penny Thomas addresses a wider audience, explains  
9 the workaround and she says:  
10 "The analysis we have conducted (covering receipts  
11 over the last 4 months) ..."  
12 Does that assist you with your recollection as to  
13 the analysis that was conducted?  
14 **A.** Yes.  
15 **Q.** Yes, and what might that mean, "covering receipts over  
16 the last four months"?  
17 **A.** I think this was the request that we received. So we  
18 would have -- can you explain that? Can you just  
19 explain that question, sorry.  
20 **Q.** I think you conducted some analysis and she is telling  
21 people about the analysis that's been conducted.  
22 Perhaps you can assist us with that first paragraph.  
23 **A.** I can't remember the analysis that I had done.  
24 **Q.** Yes.  
25 **A.** Yeah.

41

1 timeframes. These changes will alleviate unnecessary  
2 pressure on the team and should be implemented at the  
3 earliest opportunity."  
4 Do you recall during this period your small team  
5 being particularly busy with these workarounds with  
6 creating, for example, manually checking various  
7 spreadsheets?  
8 **A.** Yes.  
9 **Q.** Did you personally get involved in that process?  
10 **A.** Yes, I did.  
11 **Q.** We've talked about earlier issues that I think your  
12 evidence can be accurately summarised as not being seen  
13 as such significant issues or not significant enough to  
14 have been brought to your attention?  
15 **A.** Correct, yeah.  
16 **Q.** Was this particular issue seen as a significant issue?  
17 **A.** Yes, it was, yes.  
18 **Q.** Yes, and it was seen as a significant issue, why?  
19 **A.** Because of the data we were providing back to Post  
20 Office.  
21 **Q.** What were the concerns?  
22 **A.** That there could be duplicate transactions and  
23 obviously, because this information was being provided  
24 to Post Office to be taken to court, so it seemed  
25 quite --

43

1 **Q.** But are you able to assist, by looking at that, what it  
2 might have involved?  
3 **A.** I can't, sorry, no.  
4 **Q.** It continues:  
5 "We anticipate that by May 11 the bulk of the  
6 requests we receive will be for Horizon Online records  
7 covering the time frame January to December 2010.  
8 Indeed from February 2011 the bulk of the requests may  
9 consist of [Horizon Online] records."  
10 Then there's a paragraph that describes the  
11 workaround, if we scroll down, and she says:  
12 "Therefore, for all retrievals we will need to  
13 include additional spreadsheets and [a checking  
14 process]."  
15 Then:  
16 "Running additional reports, using a macro and  
17 manually checking spreadsheets will increase  
18 significantly the time to complete a retrieval;  
19 I estimate that an additional 20 minutes will be  
20 required to complete each ARQ, and that will require  
21 an additional 3 working days per month to be found.  
22 Additional work requirements are already being placed on  
23 the Prosecution Support Team in the form of supporting  
24 Reconciliation and there is a possibility we will be  
25 more than stretched to fulfil are required ARQ return

42

1 **Q.** Because it could impact on the reliability of the  
2 audit --  
3 **A.** Correct.  
4 **Q.** -- data that is being provided to the Post Office?  
5 **A.** Correct, yes.  
6 **Q.** I want to ask you about the provision of witness  
7 statements. Could we please look at FUJ00225719,  
8 please. I'm going to start on the bottom of page 2 into  
9 page 3, please. That's an email of 6 September 2010.  
10 So we're going slightly back in time now. There's  
11 an email from yourself to Andrew Dunks and you say, as  
12 follows:  
13 "Just spoken to Maureen and the data for Kirkoswald  
14 [that's a Post Office] needs to be resent as this had  
15 duplicated data. I have rerun the reports for you, so  
16 please can you check and get these sent to [the Post  
17 Office], also I understand that these also require the  
18 Witness Statements as well so please can you get this  
19 done as we will need to get this out [as soon as  
20 possible] as this will be going to court on  
21 20 September."  
22 So it seems as though there is an ARQ return that  
23 contains duplicated data in September 2010, and you are  
24 asking Andrew Dunks to check; is that right?  
25 **A.** Correct, yes.

44

1 Q. If we scroll up, we have an email from Penny Thomas to  
2 yourself. It says:  
3 "Please make sure Andy also presents 059."  
4 Are you able to assist us with what that means?  
5 A. No, I don't know what 059 was.  
6 Q. No.  
7 A. I don't know whether it was an ARQ request or a request  
8 for a witness statement.  
9 Q. If we see there, "Subject" and then it says, "ARQ  
10 P048-P058", and it then refers to 59, does that assist  
11 you at all?  
12 A. No, I don't know what 59 would have been, no, sorry.  
13 Q. If we scroll up, please, there's an email from yourself  
14 to Penny Thomas. You say as follows:  
15 "Andy has checked the information on the disk, but  
16 with regards to the witness statement mentioned that  
17 would need to compile this as I have ran the retrievals  
18 off, please advise whether I would need to do this."  
19 Then if we go over to the first page, please,  
20 there's a response from Penny Thomas to Andy Dunks, and  
21 she says as follows:  
22 "Andy  
23 "As you know, these returns are reruns of work you  
24 have already completed; 3 out of the 12 of your returns  
25 contain duplicate transactions, all ... need to be

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1 being asked by a Detective Constable so this is a police  
2 request for a witness statement, and he says:  
3 "Firstly, many thanks for producing the further disk  
4 with ARQ data for the Preston Road office.  
5 "Could I please trouble you to provide a statement  
6 exhibiting the CD that you sent through.  
7 "I can provide a draft statement and send it to you  
8 unless you have a corporate document that can be used.  
9 Penny Thomas provided one such statement previously for  
10 this case."  
11 If we look at the top email there's an email from  
12 yourself to Andy Dunks, and you say:  
13 "I have been requested to produce a statement for  
14 Preston Road, please see below. When you're free are  
15 you able to go through the witness statement document  
16 with me as I have not produced one?"  
17 Is that a reference to the *pro forma* statement that  
18 we saw earlier today?  
19 A. Yes, it is, yeah.  
20 Q. It seems at that point that it may be that you're  
21 considering whether you will give a witness statement or  
22 not.  
23 A. Yes.  
24 Q. Can we please look at FUJ00122622. The officer in that  
25 email refers to an earlier witness statement from Penny

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1 re-presented on one disk. They are due in court on  
2 20 September. We have to get them to Salford and they,  
3 in turn, have to relay to the Investigator, so we need  
4 to get them in the post today.

5 "In order to get these out as quickly as possible  
6 I asked Raj to rerun them for you. If you really are  
7 unhappy to take ownership of the work she has completed  
8 on your behalf please could you rerun them for yourself;  
9 raj can show you the fast ARQ process which really is  
10 not onerous at all. You will need to update your  
11 witness statement. The disk and statement need to be in  
12 the post today, please."

13 It seems as though Penny Thomas has effectively  
14 stepped in to say that Andy Dunks should be providing  
15 the witness statement but not yourself --

16 A. Correct, yes.

17 Q. -- is that right?

18 A. Yeah.

19 Q. Is that something that she did regularly?

20 A. So when I joined the company, I wasn't comfortable in  
21 providing a witness statement. So any requests that did  
22 come in for a witness statement it would be either Penny  
23 or Andy that would provide that.

24 Q. Yes. Can we please look at FUJ00156224. This is  
25 a different case, Preston Road post office, and you're

46

1 Thomas and we have that earlier witness statement. It's  
2 dated 28 September 2009. This is very much like the  
3 *pro forma* that we saw earlier; do you agree with that?

4 A. Yes.

5 Q. If we look at page 3, for example, about halfway down,  
6 it has the words "Preston Road branch" and that's the  
7 insertion of the particular branch into the *pro forma*,  
8 and then that final paragraph, for example, is the one  
9 that we saw from the 2008 document into the *pro forma* --

10 A. Yeah.

11 Q. -- and here we see it in an actual statement.

12 Over the page, please. We have the various controls  
13 that apply. We've already looked at those in the  
14 *pro forma*.

15 Then over another page, please, we have below that,  
16 please, over the page at the bottom of this page, we  
17 have that paragraph that appeared in the *pro forma*:

18 "There is no reason to believe that the information  
19 in this statement is inaccurate because of the improper  
20 use of the system. To the best of my knowledge and  
21 belief at all material times the system was operating  
22 properly, or if not, any respect in which it was not  
23 operating properly, or was out of operation was not such  
24 as to effect the information held within it."

25 When we began today and you looked at the *pro forma*

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1 I think your evidence was that you didn't see a problem  
 2 with that paragraph. Having gone through all of the  
 3 various issues that have been identified, would you  
 4 yourself sign up to that form of words?  
 5 **A.** No. No, I wouldn't.  
 6 **Q.** Why not?  
 7 **A.** Because of all the issues that have been identified.  
 8 **Q.** Yes. Could we please look at FUJ00123081. This is the  
 9 statement that was ultimately provided. It seems as  
 10 though bomb actually provided the Preston Road statement  
 11 in the end. We're there, 19 October 2010. She's  
 12 provided a second statement, and she says:  
 13 "Further to my statement dated 28 September 2009  
 14 ..."  
 15 So that's further to the statement we just saw.  
 16 If we could scroll down, please, she then exhibits  
 17 the data that you produced and we see at the bottom of  
 18 the next page again that form of words used at the very  
 19 bottom into the next page, same form of words from the  
 20 previous statement, same form of words from the *pro*  
 21 *forma*; is that right?  
 22 **A.** Yes.  
 23 **Q.** If we keep scrolling, please. Thank you. Can we look  
 24 at page 17 of this same document, please. There's  
 25 an email chain on page 17 which is the original request  
 49

1 says:  
 2 "I would appreciate if this could be passed on to  
 3 Raj (ideally) or another, who could complete this  
 4 statement TOMORROW ... and get it sent to me as a matter  
 5 of urgency, as this trial commences next week ..."  
 6 If we scroll up to the very top, we have Mark  
 7 Dinsdale to Penny Thomas, he says:  
 8 "Penny are you able to ask Raj to do the witness  
 9 statement please."  
 10 So it seems as though very much the officer and  
 11 those elsewhere potentially at Fujitsu had in mind for  
 12 you to be the author of that statement but, ultimately,  
 13 it was Penny Thomas that provided the statement.  
 14 **A.** Yes, correct, yeah.  
 15 **Q.** If we go back to page 1 of this document, the statement  
 16 that we've just been looking at, there's just  
 17 a paragraph on the first page that I would like to take  
 18 you to. So I'm just going to read that second  
 19 substantive paragraph on this page. It says:  
 20 "The data requested was originally supplied to Post  
 21 Office Limited on 26 August 2010 by Rajbinder Bains.  
 22 I have reviewed the archived ARQ data extracted by  
 23 Rajbinder Bains and confirm that the data provided was  
 24 extracted from the Horizon system in accordance with the  
 25 requirements of ARQs 226 to 228/1011 and that the  
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1 from the officer at the bottom of the page, that we've  
 2 already seen. If we have a little look at that, so  
 3 that's the request from the officer. Then if we scroll  
 4 up, Penny Thomas says as follows, she says:  
 5 "Please be advised that all requests for Fujitsu  
 6 support, ie data, statements, court attendance, etc, are  
 7 to be requested via the Security Team at Salford. We  
 8 are unable to respond to any requests you may make."  
 9 If we scroll up to page 15, please, there's the  
 10 response from the officer. He emails Mark Dinsdale. Is  
 11 Mark Dinsdale the appropriate person at Fujitsu to  
 12 contact about the obtaining of a witness statement? Is  
 13 that something you're able to assist with?  
 14 **A.** Mark Dinsdale ... I recall the name but I can't remember  
 15 whether he was Fujitsu or Post Office.  
 16 **Q.** The officer says as follows:  
 17 "Penny Thomas provided a very thorough statement  
 18 previously for this case. All I require now is a brief  
 19 statement to exhibit the second disc, which has been  
 20 produced. Raja Bains dealt with this request from the  
 21 Post Office ... and I have received the disc."  
 22 Then he says out a potential form of words for  
 23 a statement, essentially just exhibiting the audit  
 24 records that you had produced.  
 25 If we scroll down, the final paragraph there, he  
 50

1 extraction process followed the outlined procedure.  
 2 I produce a CD containing the results and exhibit them.  
 3 The CD contains a certified true copy of the original  
 4 transaction data supplied in August 2010. This data has  
 5 been held securely on the audit data workstation since  
 6 its original extraction and contains no additions,  
 7 deletions or other amendments."  
 8 Would you agree that it's quite unusual for somebody  
 9 who didn't actually download the data to be using this  
 10 form of words within a witness statement, to be  
 11 exhibiting data as having been, for example, extracted  
 12 in accordance with the requirements and following  
 13 a certain procedure, when, in fact, she wasn't the one  
 14 who did the downloading or extraction? Does that strike  
 15 you as unusual at all?  
 16 **A.** Looking at it, yes.  
 17 **Q.** Yes, how, for example, could she have said that it was  
 18 extracted in accordance with procedure? Do you think  
 19 she was well placed to make that statement?  
 20 **A.** Well, it would have been a process that I would have  
 21 followed to extract the information, so ...  
 22 **Q.** Because if we scroll over and go to the standard wording  
 23 that I've -- that we've been through a couple of times,  
 24 at the bottom of the second page into the third page,  
 25 that standard wording again that I think your evidence  
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1 has been that it's not a form of words you would have  
2 signed up to, that there's no reason to believe that the  
3 information is inaccurate because of the improper use of  
4 the system and that, to the best of her your knowledge  
5 and belief at all material times, the system was  
6 operating properly.

7 Did you have a conversation with Penny Thomas in  
8 advance of her signing this statement about the system,  
9 about the process that you undertook to obtain the ARQ  
10 data?

11 **A.** No, no, I wouldn't have.

12 **Q.** Because I think in your witness statement,  
13 paragraph 21 -- I can take you do it -- I think you say  
14 you didn't have a conversation with Penny Thomas --

15 **A.** No.

16 **Q.** -- about the contents of witness statements?

17 **A.** No, because I never -- that was not part of my role, to  
18 deal with witness statements.

19 **Q.** Do you see it as in any way odd or unusual that Penny  
20 Thomas would have signed a statement that said that the  
21 system was operating properly, exhibiting the ARQ data  
22 that you had extracted, but not having any conversations  
23 with you about that data?

24 **A.** No.

25 **Q.** You don't see that as unusual?

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1 covered over by our redactions that obscure signatures  
2 but this is a document referred to in your witness  
3 statement as the one that you were the --

4 **A.** Yes.

5 **Q.** -- witness. If we scroll up, please, it's 14 October  
6 2010, so it's five days before the statement that we  
7 were looking at before the break.

8 **SIR WYN WILLIAMS:** Sorry, Mr Blake. This says this  
9 statement is of Ms Thomas.

10 **MR BLAKE:** Yes, it is. So Ms Thomas wrote the statement  
11 and, if we look down at the bottom there is a signature  
12 of both the author of the statement and also the person  
13 that witnessed the statement.

14 **SIR WYN WILLIAMS:** I'm with you, thank you.

15 **MR BLAKE:** On the bottom, on the right-hand side, although  
16 it's covered over Ms Sangha's signature is on the  
17 right-hand side at the bottom.

18 So this was five days earlier. If we scroll down we  
19 can see again it's the same *pro forma* witness statement.  
20 If we look at page 5, please, this relates to a branch  
21 at Wattville Road. We can see that on page 5, in the  
22 first substantive paragraph there, near the top, it says  
23 Wattville Road branch. Then about halfway down that  
24 page, it says:

25 "The requested data for ARQs 197-199/1011 was

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1 **A.** No.

2 **Q.** Why not?

3 **A.** It was a process that I followed and I was not involved  
4 in witness statements, so I just assumed it was part of  
5 the process that whatever had been extracted would be  
6 included in there, into the witness statement.

7 **MR BLAKE:** I'd like to look at another witness statement --  
8 sir, I'm just looking at the time. Perhaps this is  
9 a good moment for our mid-morning break. We will be  
10 finished by lunchtime today.

11 **SIR WYN WILLIAMS:** Yes, certainly that's fine, Mr Blake.  
12 When do you want to start again?

13 **MR BLAKE:** Thank you very much, if we start in 15 minutes'  
14 time, so 11.35, please.

15 **SIR WYN WILLIAMS:** Yes, certainly.

16 **MR BLAKE:** Thank you very much.

17 (11.18 am)

(A short break)

18 (11.35 am)

19 **MR BLAKE:** Thank you, sir, can you still see and hear me?

20 **SIR WYN WILLIAMS:** Yes, I can, thank you.

21 **MR BLAKE:** Thank you. I'm going to take you to another  
22 witness statement and that's FUJ00123054. This is the  
23 statement that you were the witness for. If we scroll  
24 down to the bottom your signature is at the bottom, it's

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1 originally supplied to Post Office on 26 August 2010 by  
2 Rajbinder Bains. I have now reviewed the archived ARQ  
3 data which was extracted [by you] and confirm that the  
4 data provided was extracted from the Horizon system in  
5 accordance with the requirements ... and that the  
6 extraction process followed the outlined procedure."

7 If we continue down near the bottom of the  
8 statement, so pages 6 into 7, we have that form of words  
9 that we saw in those other statements. It's the bottom  
10 of page 6 and 7, thank you.

11 Can I just take you to your witness statement and  
12 that's WITN10300100. The statement we've just been  
13 looking at refers to data that you had extracted but  
14 Penny Thomas provided the witness statement for --

15 **A.** Correct, yeah.

16 **Q.** -- and you witnessed her simply signing the statement  
17 itself. It's paragraph 21, page 9 of your witness  
18 statement, please. Thank you. You're referring here to  
19 the statement that we've just looked at, and you've  
20 said:

21 "... the Inquiry has asked (i) to what extent  
22 witness statements were 'generic' or fact specific, (ii)  
23 whether I read or discussed the content of witness  
24 statements that I witnessed, (iii) any concerns I had  
25 about the contents ... (iv) any communications I had

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1 with Ms Thomas ... (v) any concerns Ms Thomas may have  
2 had regarding her role ... I understood that witness  
3 statements were fact specific based on what [the Post  
4 Office] had requested. To witness Ms Thomas signing her  
5 statement, I was not expected to read the contents of  
6 the witness statement. I cannot now recall having  
7 discussions or concerns about the contents of her  
8 witness statement that I witnessed. I did not have any  
9 discussions with Ms Thomas in relation to the accuracy  
10 of witness statements nor any concerns she had about her  
11 role as a witness in court proceedings."

12 Now, where you refer to "fact specific based upon  
13 what the Post Office had requested", I think we've seen  
14 today that there was a basic *pro forma* statement --

15 **A.** Yes.

16 **Q.** -- that was adapted to the specific case. In terms of  
17 a conversation with Ms Thomas, again, in relation to  
18 a statement that you had both witnessed the signature of  
19 and also that referred to data that you had extracted,  
20 do you think it's unusual in any way that there wasn't  
21 a conversation between yourself and Ms Thomas about the  
22 accuracy or the contents of that statement?

23 **A.** No, looking back on it, no.

24 **Q.** No?

25 **A.** No.

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1 says as follows, she says:

2 "A Fast ARQ interface does not provide the user with  
3 any indication of duplicate records/messages."

4 I think it's the same form of words that we've just  
5 seen.

6 **A.** Yes.

7 **Q.** Then there's an entry from Mr Barnes at the bottom. It  
8 says:

9 "Andy and I have looked at this. We think the  
10 method most compatible with existing behaviour is as  
11 follows ..."

12 If we scroll on to the next page, please. Thank  
13 you. The top entry there, please, thank you:

14 "Check for duplicates for [Horizon Online] in  
15 a similar method to how duplicates are checked for in  
16 Horizon."

17 I think that's a reference to Legacy Horizon:

18 "For Horizon, they are legitimately logged in the  
19 audit log and then ignored (because it's just that  
20 identical messages are stored by mistake in more than  
21 one transaction file). For [Horizon Online], in the  
22 Fast ARQ case, their detection will cause them to be  
23 logged in the QueryLog and a count kept of how many  
24 there are", et cetera.

25 He sets out further detail there.

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1 **Q.** Can we please look at FUJ00171848, please. This is  
2 another PEAK. It's FUJ00171848. When we get to it,  
3 it's a PEAK that begins on 27 October 2010. So we have  
4 the Wattville Road statement dated 14 October 2010.  
5 We've got the Preston Road statement that we've also  
6 seen, 19 October 2010, both with the same form of words  
7 at the end of both of those statements.

8 We're now 27 October, so very shortly after both of  
9 those statements were signed and we have an error log  
10 PC0205805 and it is summarised as follows, if we scroll  
11 down:

12 "The Fast ARQ interface does not provide the user  
13 with any indication of duplicate records/messages.

14 "This omission means that we are unaware of the  
15 presence of duplicate transactions. In the event that  
16 duplicates are retrieved and returned to [the Post  
17 Office] without our knowledge the integrity of the data  
18 provided comes into question. The customer and indeed  
19 the defence and the court would assume that the  
20 duplicates were *bona fide* transactions and this would be  
21 incorrect. There are a number of high-profile court  
22 cases in the pipeline and it is imperative that we  
23 should provide sound, accurate records."

24 If we scroll down, please, to the second entry,  
25 27 October, we have an entry from Penny Thomas. She

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1 If we scroll down, please, to the entry of  
2 5 November, thank you, if we could zoom out and look at  
3 the final entry on that page, so that final box.  
4 Mr Barnes provides a technical summary, and he says as  
5 follows:

6 "HNG-X [Horizon Online] can rarely produce  
7 transactions with duplicate journal sequence numbers.  
8 At the moment when running a [I think that's a Fast ARQ]  
9 on the audit server, these duplicates are not noticed.  
10 This means that the evidence presented by the  
11 prosecution team may show duplicate transactions without  
12 being noticed. The defence team may spot this and call  
13 into question the integrity of our data."

14 If we scroll down "Impact on user":

15 "Horizon Online transactions with duplicate JSNs may  
16 not be noticed. This will call into question the  
17 reliability of evidence presented by the prosecution  
18 team.

19 "Impact on operations:

20 "The prosecution evidence will be more consistent  
21 and so prosecution cases will go through more smoothly."

22 Over the page. Thank you very much. If we could  
23 highlight that top entry, please:

24 "Have relevant [Known Error Logs] been created or  
25 updated?"

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1 It says as follows:  
2 "It was not felt that a [Known Error Log] was  
3 required because there are only two people in the  
4 prosecution team and they are both fully aware of the  
5 problem."  
6 That reference to two people in the prosecution  
7 team, are you one of those two people?  
8 **A.** I can't remember. I don't --  
9 **Q.** I think you described there being three people in the  
10 team itself?  
11 **A.** Yes.  
12 **Q.** Were two people, at that stage -- so we're 5 November  
13 2010, were there two people who particularly dealt with  
14 these kinds of things?  
15 **A.** Yes, there were.  
16 **Q.** Who were those two people?  
17 **A.** Andy and Penny.  
18 **Q.** The reference there to not creating a Known Error Log  
19 because only two people were in the team and they were  
20 fully aware of it, was this was something that you were  
21 fully aware of, being the third person in the team or  
22 a third person in the team?  
23 **A.** I can't remember.  
24 **Q.** If we look at the "Risks" it says:  
25 "If the fix is not released then duplicate [Horizon

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1 **A.** The likes of Donna Munro. So, at the time, she was my  
2 boss.  
3 **SIR WYN WILLIAMS:** Right.  
4 Sorry, Mr Blake.  
5 **MR BLAKE:** Not at all, sir. Thank you.  
6 Was Donna Munro involved in issues relating to the  
7 integrity of ARQ data, from your recollection?  
8 **A.** I don't know whether she was or not. I don't know.  
9 **Q.** Was she somebody who was quite hands-on in terms of the  
10 management of the team or hands-off?  
11 **A.** No, she was hands-on. She knew what was happening  
12 within the team and --  
13 **Q.** This kind of an issue that Penny Thomas was involved in,  
14 would you have expected that to have been discussed  
15 between Penny Thomas and Ms Munro?  
16 **A.** Yes. It would have been, yes.  
17 **Q.** The reference there by Mr Barnes to "the defence team  
18 might spot this", can you assist us with what the  
19 attitude within your team might have been to defence  
20 teams in prosecutions based on Horizon data; is this  
21 a typical comment that you might find expressed within  
22 the team?  
23 **A.** I've never heard that expression within the team, so  
24 I don't know what the thoughts would have been of the  
25 team members.

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1 Online] transactions will continue not to be noticed by  
2 the prosecution team which will call into question their  
3 evidence."  
4 Then it says:  
5 "There are no particular problems [with] the fix."  
6 Does this not seem quite a significant issue for  
7 your team?  
8 **A.** Yes, it is.  
9 **Q.** Can you assist us with why a Known Error Log was not  
10 created in relation to this issue?  
11 **A.** I don't know. It wouldn't have been part of my job  
12 role. It would be dealt with senior levels of  
13 management.  
14 **Q.** Would it have been helpful to you to have been briefed  
15 on this particular issue?  
16 **A.** Yes, it would have.  
17 **Q.** Yes. You will recall --  
18 **SIR WYN WILLIAMS:** When you say -- sorry, when you say  
19 "senior levels of management", I may have been  
20 anticipating Mr Blake's next question but do you mean by  
21 that Mr Dunks and Mrs Thomas or do you mean persons  
22 higher in the hierarchy than them?  
23 **A.** Persons higher.  
24 **SIR WYN WILLIAMS:** So could you give us an indication, if  
25 you can remember, who those persons were?

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1 **Q.** You'll recall paragraph 21 of your statement that I took  
2 you to, where you said that you didn't have discussions  
3 with Ms Thomas in relation to the accuracy of her  
4 witness statements. Looking at this now, does that  
5 cause you some concern about the witness statements that  
6 were submitted?  
7 **A.** Yes, it does.  
8 **Q.** Yes. Can you think of a reason why it may have been  
9 that that wasn't subject to discussion between the two  
10 of you?  
11 **A.** The only reason I can think of is maybe because I didn't  
12 actually go to the court proceedings. So it wasn't  
13 discussed with myself.  
14 **Q.** Given that there were only three of you in the team, you  
15 all shared a room, it was a secure room that couldn't be  
16 accessed by other people: is it surprising to you that  
17 this kind of an issue wasn't more thoroughly discussed?  
18 **A.** Yes, yes it is.  
19 **Q.** Can we please look at FUJ00155517. We're now moving to  
20 2011, February 2011. Now, there is an email that is  
21 forwarded to you. We will go through the email. The  
22 email is actually dated 14 September 2010 and it's about  
23 an issue with Horizon Online. Are you able to assist us  
24 at all as to why this was sent to you or copied to you  
25 in 2011? I can read the top entry is to Andy Dunks, and

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1 it says:  
2 "As you're starting to cover audit you need to be  
3 aware of the situation detailed in this mail string."  
4 Do you know why you're copied there in 2011?  
5 **A.** I think it was for information purposes, so that I was  
6 aware that there was a situation.  
7 **Q.** If we scroll down we can see it's an email from Tom  
8 Lillywhite, who is described on the final page as  
9 Principal Security Consultant. This email states as  
10 follows:  
11 "Our RMG Account Fraud and Litigation Service are  
12 currently acting on an ARQ ... This request for  
13 transactions records, which covers March 2010, is in  
14 respect of an outlet ... which is already migrated to  
15 Horizon Online.  
16 "Because of a number of technical issues (errors  
17 detected) that arose during migration up to June 2010,  
18 and which [Post Office] technical specialists are aware  
19 of, the information gathered in respect of this  
20 particular ARQ may be subject to issues of integrity.  
21 Our technical staff have investigated the record in  
22 question and, at this stage, although they report that  
23 there is no obvious evidence of suspicious behaviour,  
24 they can add nothing further with any certainty and they  
25 do not have the ability to determine if there really are

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1 **A.** Yeah, emails.  
2 **Q.** Thank you. Did this particular issue cause you any  
3 concerns?  
4 **A.** Not at the time, no, because I didn't have that much  
5 knowledge of the system.  
6 **Q.** Knowing now all the things that we've already been  
7 through, all of those various statements that were  
8 provided, does this cause you any concerns?  
9 **A.** It does now, yes.  
10 **Q.** Can we please look at FUJ00229039. We're now in April  
11 2011, two months later. We can see that's an email from  
12 Gareth Jenkins to yourself and perhaps we could go to  
13 page 3, please. Bottom of page 2, into page 3. Thank  
14 you very much.  
15 There's an email from Gareth Jenkins to somebody  
16 called Saheed and it says as follows -- it's in  
17 reference to a particular branch and it says:  
18 "I've had a quick look at the info that Mark has  
19 already provided to [the Post Office] about the  
20 discrepancies issue last year and how it relates to this  
21 branch.  
22 "It looks like this branch hit the problem twice  
23 ..."  
24 It then says:  
25 "These put together result in a net discrepancy of

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1 any financial implications with the messages. In other  
2 words, any response from us would have to bear the  
3 health warning that there was no guarantee as to the  
4 integrity of the data provided by us.  
5 "The issue is of particular relevance in light of  
6 the fact that provision of an ARQ could result in  
7 a request for a Statement of Witness to support  
8 litigation activity. As such, any statement of witness  
9 provided would, in real terms, have to reflect this."  
10 So there seems to be the identification of  
11 a particular issue that impacts on the integrity of  
12 data. Was it common for these kinds of issues to be  
13 shared over email in this way? If we look at the top,  
14 it seems as though Penny Thomas is sending it to Andy  
15 Dunks, essentially a historic email, to update him as to  
16 issues relating to integrity because he's taking up some  
17 sort of role relating to audit.  
18 **A.** Yeah, it was normal.  
19 **Q.** That was normal?  
20 **A.** Yeah.  
21 **Q.** So, in terms of notifying people of issues relating to  
22 integrity of the audit data, would you say it was more  
23 common to receive emails rather than there had to be  
24 some official documentation or notification of some  
25 sort?

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1 [minus] £335.66.  
2 "The data relating to the first period will now have  
3 gone from BRSS as will some of the data from the second  
4 period."  
5 Are you able to assist us with "BRSS", what that  
6 means?  
7 **A.** No, I don't remember, no. Sorry.  
8 **Q.** At the bottom of the page, it says:  
9 "Given that it is now clear the branch hit the bug  
10 twice (as did [another branch]), is that sufficient  
11 information for [the Post Office], or do we need to  
12 retrieve the audit data for the relevant periods and  
13 carry out a more complete analysis?"  
14 Then if we go to the bottom of page 1 into page 2,  
15 we have the email from Gareth Jenkins to Penny Thomas  
16 and yourself. It says:  
17 "Penny (or Raj if Penny's still away),  
18 "Saheed has asked me to do some investigations into  
19 this Branch and most of the relevant data will have been  
20 archived from BRSS by now.  
21 "Therefore please can you retrieve the data as for  
22 an ARQ."  
23 So Mr Jenkins is getting in touch with you and Penny  
24 Thomas about a particular bug that's affected a branch  
25 that's caused a discrepancy and has asked for you to run

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1 an ARQ; is that right?  
 2 **A.** Yes, that's correct, yeah.  
 3 **Q.** It seems from these emails that there are a number of  
 4 emails relating to bugs, errors or defects in the  
 5 Horizon system. Can you assist us with why, at that  
 6 particular time, you weren't more concerned about the  
 7 integrity of the system?  
 8 **A.** Because I didn't have much knowledge of the system,  
 9 I just saw my role as to process the ARQ requests.  
 10 I wasn't involved in or didn't have much knowledge of,  
 11 the issues, obviously, that have been identified.  
 12 **Q.** I said a few times about the small number of people in  
 13 the room, the room being secure, et cetera. People  
 14 might see it as surprising that you didn't have, you  
 15 know, team meetings, discussions within the room, about  
 16 problems generally with Horizon, the bugs that we've  
 17 just been referring to that caused discrepancies, issues  
 18 with the integrity of the ARQ data. Can you assist us  
 19 with why that might be the case, that there were no  
 20 discussions?  
 21 **A.** Obviously, there were discussions but, obviously,  
 22 I didn't understand the severity of these issues,  
 23 compared to other senior members of the team.  
 24 **Q.** You've been very candid today about now having concerns,  
 25 looking back.

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1 If we scroll up, please. The next email says, it's  
 2 from Andy Dunks to Graham Brander and Penny Thomas:  
 3 "As far as standing in for Penny, I do not think my  
 4 knowledge is good enough to be able to do this to the  
 5 level that Penny could answer any questions. I would  
 6 not be comfortable to do it."  
 7 Then it's the first email in this chain the top  
 8 email of the chain that we are concerned with, which is  
 9 from Penny Thomas to Donna Munro, so who you've  
 10 explained was effectively a line manager of the team.  
 11 **A.** Correct, yes.  
 12 **Q.** She says:  
 13 "Donna  
 14 "It would appear you have a gaping hole as far as  
 15 prosecution support is concerned; Andy being  
 16 uncomfortable to support a basic statement and Raj not  
 17 being prepared to submit one."  
 18 It seems, from this email, a reading of this email,  
 19 is that what Penny Thomas is doing is distinguishing two  
 20 different positions: the one of Andy, who said that he  
 21 doesn't have enough knowledge to be able to support the  
 22 statement; and, on the other hand, yourself, not being  
 23 prepared to submit one, suggesting that you had some  
 24 real concerns about submitting a statement. Did you  
 25 have real concerns about submitting a statement?

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1 **A.** Yes.  
 2 **Q.** In reality, though, did you have concerns during the  
 3 period that we've gone over --  
 4 **A.** No.  
 5 **Q.** -- about the integrity of the system, the reliability of  
 6 the ARQ data?  
 7 **A.** No, I didn't.  
 8 **Q.** Because there's an email I want to take you to that  
 9 you've seen, it's FUJ00156518, please. It's the email  
 10 about the Swiss Cottage trial. If we have a look at the  
 11 bottom page, there's an email from Graham Brander to  
 12 Penny Thomas and Andy Dunks, and it says:  
 13 "I still haven't had confirmation as to whether  
 14 either/both of you are required."  
 15 It's for a particular trial relating to, it seems,  
 16 Swiss Cottage post office:  
 17 "The provisional batting order for witnesses ...  
 18 shows Penny being required on day 2 ... and Andy on  
 19 day 3 ...  
 20 "Andy: can you confirm that if required, you are  
 21 able to cover Penny's evidence in case she is unable to  
 22 attend.  
 23 "Penny: I have asked our legal person that if you  
 24 are required that if possible can you give evidence on  
 25 day 1 but I am still awaiting a definitive response."

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1 **A.** My concern was not feeling comfortable to submit  
 2 a witness statement about a system that I didn't have  
 3 knowledge about, proper knowledge about.  
 4 **Q.** Yes. Did you think that those within your team that  
 5 sufficient knowledge to submit them?  
 6 **A.** Yes, yes they did.  
 7 **Q.** Did you, during the period that we've looked at -- as  
 8 I've said, you've been very open about your concerns  
 9 now -- was it in no way to do with those kinds of  
 10 concerns that you weren't prepared to submit a witness  
 11 statement back in 2010, 2011, 2012?  
 12 **A.** No, it wasn't. I just was not comfortable in producing  
 13 a witness statement.  
 14 **Q.** Can we please look at a later bug, and that is  
 15 FUJ00226106. We're now in 2013. At the bottom of this  
 16 page, we have an email from Gerald Barnes to CSPOA  
 17 Security. Who is CSPOA accurate?  
 18 **A.** It's another -- it's the same team as the Fraud and  
 19 Litigation Support.  
 20 **Q.** Then copied to yourself, Andy Dunks and others. He says  
 21 as follows:  
 22 "A serious flaw has recently been spotted in the  
 23 audit code. It was introduced in the fix to [and it  
 24 gives a PEAK reference] quite some time ago (but post  
 25 [Horizon Online]). There is a small possibility of

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1 missing transactions on generated spreadsheets if the  
2 query handling was run during the evening Query Manager  
3 shut down."

4 Then he says, for example, a little further on:  
5 "You may consider it necessary to check the previous  
6 ARQs run."

7 He describes what's called a serious flaw --

8 **A.** Yes.

9 **Q.** -- that goes back some time ago. If we scroll up we  
10 have Andy Dunks responding, copied to you. He says:

11 "Gerald,  
12 "Can you confirm that we're talking as far as back  
13 as September 2009?"

14 Actually, if you look at the PEAK, it seems to be  
15 closed in 2009, so certainly it seems to have been  
16 closed in 2009:

17 "Are you able to pop down and explain and show us  
18 what to look for, as we need to put together some time  
19 scales to complete this task."

20 Then Gerald Barnes says:

21 "Hi Andy,  
22 "I will come down in a few minutes."

23 Is this something you remember at all?

24 **A.** I do remember obviously being copied into this email and  
25 there were discussions but as to what those discussions,

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1 code being identified. Why do you think it was that  
2 that was not more of a topic of discussion within your  
3 small team?

4 **A.** I don't know.

5 **Q.** Do you think it would have been appropriate or not  
6 appropriate to have had those kinds of discussions?

7 **A.** No, it would have been appropriate, yes.

8 **Q.** The Chair is going to be considering recommendations for  
9 this Inquiry in due course. So it would be helpful to  
10 know what you think went wrong in terms of the lack of  
11 knowledge that you had about the integrity of the data  
12 that you were providing for use in court proceedings.

13 Are you able to assist us with that?

14 **A.** Sorry, can you repeat that again?

15 **Q.** If the Chair is trying to understand what went wrong,  
16 why wasn't there this discussion about the integrity of  
17 Horizon data? What can we learn from this experience?

18 What is it that you think, what is the reason you think  
19 for not being sufficiently informed or for there to have  
20 been insufficient discussions about what received like  
21 quite serious problems with the integrity of the audit  
22 data that's being provided for prosecutions?

23 **A.** Sorry, it's gone over my head.

24 **Q.** Is there anything you can think of that you didn't do as  
25 a team that would have been better, had you done it?

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1 looking back on it now, I can't remember.

2 **Q.** Because there's no answer in that email about the 2009  
3 issue?

4 **A.** No.

5 **Q.** There's just the query?

6 **A.** Yeah.

7 **Q.** "Can you confirm that we're talking as far as back as  
8 September 2009?" The response is "I'll come down"; was  
9 that coming down to your team?

10 **A.** Coming down to the secure room to show us.

11 **Q.** Yes, and you can't recall significant discussions about  
12 this issue at all?

13 **A.** No.

14 **Q.** No. We've seen throughout the course of today your name  
15 on various emails, often copied in --

16 **A.** Yes.

17 **Q.** -- about certain bugs or certain issues with ARQ data  
18 and the integrity of the data. We've seen statements  
19 from Penny Thomas, exhibiting ARQ data that you had  
20 obtained and providing that standard form of words  
21 towards the end of the statement. You've, in at least  
22 one of those cases, witnessed the statement being  
23 signed?

24 **A.** Yes.

25 **Q.** We have here, for example, serious flaws in the audit

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1 **A.** Maybe obviously have more conversations about these  
2 issues that were identified and it being filtered down  
3 to everyone within the team.

4 **Q.** Can we look at FUJ00229905, please. This is a final  
5 email chain that I'll take you to that relates to bugs,  
6 errors or defects in the Horizon system. We're now on  
7 13 May/14 May 2013. If we could go over the page,  
8 please, and start on page 2. From Gareth Jenkins to  
9 yourself:

10 "Raj,

11 "There was a significant bug on [Horizon Online]  
12 that affected about 14 branches that was identified  
13 earlier this year that is causing some interest with  
14 high levels of management in [the Post Office] and  
15 Fujitsu.

16 "Anne Chambers has done some detailed analysis based  
17 on information in BRDB/BRSS, but I think it would be  
18 helpful to pull back the transaction logs for the  
19 relevant periods to confirm the analysis."

20 If we go over the page, the first page, there's  
21 a response from you to Gareth Jenkins. You say as  
22 follows:

23 "Hi Gareth,

24 "No problem -- I have set the retrievals off now and  
25 should be able to get all the information by Friday if

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1 not earlier however I am not in the office until  
 2 Wednesday and Thursday we have an audit taking place so  
 3 not sure whether I will have time, however I will try to  
 4 get this to you [as soon as possible]."  
 5 Then you have an email from him to you:  
 6 "Raj,  
 7 "Please can you retrieve similar info for the  
 8 following branches ...  
 9 "This work should be chargeable to the 'Second  
 10 Sight' CP I mentioned yesterday. If there is no more  
 11 covering on that then please let me know and I'll take  
 12 it up with Pete Newsome."  
 13 So we have an email from Gareth Jenkins on 13 May  
 14 that refers to some interest with high levels of  
 15 management in the Post Office and Fujitsu, we have  
 16 a reference there to Second Sight; were these not topics  
 17 that were discussed within your team?  
 18 **A.** With myself, no, they weren't.  
 19 **Q.** Did it not stand out that high levels of -- you were  
 20 being told in an email that there's something of  
 21 interest to high levels of management within the  
 22 company?  
 23 **A.** At the time no, it wouldn't have.  
 24 **Q.** Was it known within the company that there were concerns  
 25 with management and that related to, in some way, the

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1 **A.** No, I didn't.  
 2 **Q.** Do you think you had enough information -- being  
 3 a person who was meeting with the Post Office, do you  
 4 think you had been provided with enough information  
 5 internally relating to concerns about the integrity to  
 6 be able to have passed those on?  
 7 **A.** No, no.  
 8 **Q.** Why not?  
 9 **A.** Because of -- obviously, all these issues that have been  
 10 identified, and not having the technical knowledge of  
 11 the system, but obviously in what context this  
 12 meeting -- this agenda is about, I can't remember what  
 13 was discussed that my name is against the ARQ process,  
 14 I don't -- I can't recall.  
 15 **Q.** I'd just like to take you to one final document today  
 16 and that's FUJ00180028. We're now in 2018 so quite  
 17 a while later. There seems to be a general  
 18 communication that's sent out. It states as follows:  
 19 "Post Office Limited are currently involved in  
 20 a class action brought by a group of current and former  
 21 subpostmasters which is due in court in November 2018  
 22 and March 2019. During this period, it is possible that  
 23 Freeths Solicitors, who are representing the  
 24 subpostmaster group, may attempt to contact Fujitsu  
 25 staff. If you receive such contact please do not

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1 job that you were performing or the task that you were  
 2 performing?  
 3 **A.** No.  
 4 **Q.** No. Can we please look at POL00333387. We're now in  
 5 2014, August 2014. I think this is a meeting that you  
 6 don't actually recall but I just want to very briefly  
 7 take you to it. So this is Alan Simpson from the Post  
 8 Office sending you a draft agenda for a meeting.  
 9 Then if we go to that agenda, POL00333391, we have  
 10 there some attendees from Fujitsu, some attendees, some  
 11 invitees, from the Post Office. It looks as though you  
 12 are there to talk to the Post Office about the ARQ  
 13 process; is that right?  
 14 **A.** Yes.  
 15 **Q.** Yes.  
 16 **A.** That's what this is showing, yes.  
 17 **Q.** I mean, given that you seem to at least by 2014, have  
 18 been a contact with the Post Office about the ARQ  
 19 process, do you think that you were sufficiently  
 20 informed about problems with the ARQ process that stage?  
 21 **A.** Yes, I had.  
 22 **Q.** Did you have discussions with the Post Office about  
 23 concerns relating to the integrity of --  
 24 **A.** Oh, no.  
 25 **Q.** -- of data?

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1 respond, but instead pass the details of the contact to  
 2 Pete Newsome or Chris Jay.  
 3 "Thank you for your cooperation in this matter."  
 4 It's from Garry Stewart, the Delivery Executive Post  
 5 Office Account. So he was somebody who worked at  
 6 Fujitsu but was responsible for the Post Office Account;  
 7 is that right?  
 8 **A.** Correct, yes.  
 9 **Q.** At the top, you seem to be forwarding it to somebody  
 10 called Victoria Griffin; do you recall who she was at  
 11 all?  
 12 **A.** Yes, she was a former colleague.  
 13 **Q.** Was she senior to you, junior to you, same level?  
 14 **A.** She didn't work for part of the Fraud and Litigation  
 15 Support, no.  
 16 **Q.** Can you recall why it may have been that you forwarded  
 17 to her at all?  
 18 **A.** Just for information.  
 19 **Q.** Yes. Looking at the contents of that, relating to  
 20 potential contact, "If you receive such contact ... do  
 21 not respond", do you think that within Fujitsu people  
 22 were able to speak freely about problems with the  
 23 Horizon system?  
 24 **A.** Yes, they were.  
 25 **Q.** Yes. Do you think that the members of your team were

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1 able to speak sufficiently freely about the integrity  
2 issues relating to the ARQ data?  
3 **A.** Yes, they were, yeah.  
4 **Q.** In those circumstances, why do you think it is that,  
5 within your very small team, you didn't build up  
6 sufficient knowledge to be able to raise any concerns  
7 yourself?  
8 **A.** At the time, I didn't see a concern. So I didn't see  
9 a concern at the time.  
10 **Q.** Why did all those emails, email after email after email,  
11 not cause you some concerns?  
12 **A.** Because it would have been dealt with by more senior  
13 technical people that had more of an understanding.  
14 I just saw my role as just processing ARQs.  
15 **MR BLAKE:** Thank you.  
16 Sir, I don't have any further questions. There are  
17 questions from Mr Stein and also from -- just from  
18 Mr Stein, I think.  
19 **SIR WYN WILLIAMS:** Right, over to you, Mr Stein.  
20 **Questioned by MR STEIN**  
21 **MR STEIN:** Thank you, sir.  
22 Ms Sangha, I represent a number of subpostmasters  
23 and mistresses and I'm instructed by a firm of  
24 solicitors called Howe+Co. Now, I've got a few  
25 questions for you that arise out of your statement --

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1 subpostmasters?  
2 **A.** No, I wasn't.  
3 **Q.** Now, as time has evolved and, in particular, as you may  
4 have become aware of the issues involved in this  
5 Inquiry, you probably have seen that this was a very  
6 serious job with real life serious consequences for  
7 subpostmasters; is that fair?  
8 **A.** Yes, that is fair. Yes.  
9 **Q.** So when you joined the Fraud and Litigation Support  
10 Team, were you given any training as to the need for you  
11 to be as complete and as accurate as possible, or to be  
12 as diligent as possible, to make sure that the data  
13 provided was as good as possible?  
14 **A.** So the only training that I received was from fellow  
15 team members.  
16 **Q.** Was there any training as to how ARQ data might be used  
17 within the court process?  
18 **A.** No.  
19 **Q.** Now, of course, you do understand from all of the  
20 publicity created by the Inquiry and indeed by the  
21 decades of campaigning that subpostmasters have  
22 conducted over the years, that, because there were bugs  
23 in the system, innocent people have gone to prison --  
24 **A.** Correct.  
25 **Q.** -- or have lost their livelihoods --

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1 **A.** Okay.  
2 **Q.** -- and one document that I want to put to you from the  
3 background material. Can I take you to your statement,  
4 which is WITN10300100 and paragraph 7 of that at page 3,  
5 please. Thank you.  
6 Now, at this part of your statement, Mrs Sangha, you  
7 identify the period of time that you were with Fujitsu,  
8 as you still are, as a Fraud and Litigation Support  
9 Officer in the Fraud and Litigation Support Office,  
10 okay? We can see that, if we go down to paragraph 8, if  
11 you would, please, same page, that you went on leave in  
12 April 2016 and, upon returning from leave in January  
13 2017, you commenced in a new role.  
14 So between those two paragraphs we've identified  
15 within your statement where you are saying you joined in  
16 July 2010 the Fraud and Litigation Support Team, and  
17 then you go on leave in April 2016 and you come back  
18 from leave in January '17 and you're in another role?  
19 **A.** Correct, yes.  
20 **Q.** All right.  
21 So when you join the Fraud and Litigation Support  
22 Team and part of your tasking is to provide ARQ data for  
23 litigation conducted by the Post Office, did you have  
24 an understanding that the provision of such data was  
25 a serious job that could have serious consequences for

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1 **A.** Yes.  
2 **Q.** -- lost their houses, homes, lost their ability to look  
3 after themselves and their families, whether that's  
4 through prosecutions or court actions taken in the civil  
5 courts. You understand that?  
6 **A.** Yes, I do, yeah.  
7 **Q.** Okay. Now, you've discussed matters with the gentleman  
8 that's been asking you questions this morning, Mr Blake,  
9 about how the system worked. So can we piece that  
10 together. The ARQ data was something that you supplied  
11 on request by others; is that right?  
12 **A.** That's right, yes.  
13 **Q.** You've also discussed with Mr Blake the fact that you  
14 and others in your team were aware that there were bugs  
15 or issues within the Horizon system, yes?  
16 **A.** Yes.  
17 **Q.** Okay. Within your statement, if we can now go, please,  
18 to paragraph 24 -- and, to assist, that's at page 10, so  
19 page 10, paragraph 24 -- you'll see there that you're  
20 saying:  
21 "The Inquiry has asked me to set out any other  
22 knowledge I had in respect of bugs, errors and defects  
23 in Horizon (including Legacy and Horizon Online) [and,  
24 secondly] how I consider they impacted the work  
25 I carried out, and ... any concerns I may have in

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1 respect of their impact on [Post Office's] litigation or  
 2 criminal proceedings in which [you] played a role."  
 3 You go on to say this:  
 4 "I do not have any specific recollections of bugs,  
 5 errors or defects in Horizon, however I would have been  
 6 aware of them during my time in the CSPOA Security  
 7 Team."  
 8 Okay?  
 9 **A.** Yes.  
 10 **Q.** All right. So you provide the ARQ data on request?  
 11 **A.** Correct.  
 12 **Q.** Others, that's Mr Jenkins and Ms Thomas, provide witness  
 13 statements in relation to the operation of the Horizon  
 14 system, yes?  
 15 **A.** Correct.  
 16 **Q.** Where there are bugs, errors and defects within the  
 17 system, was it your understanding that Ms Thomas and  
 18 Mr Jenkins would provide any information that was  
 19 required for court cases about how they may have had  
 20 an impact on the operation of the system?  
 21 **A.** I don't know.  
 22 **Q.** You've seen statements, draft statements and  
 23 statements -- you've been shown those by Mr Blake this  
 24 morning.  
 25 **A.** Yes.

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1 provide information that said "Well, look the system  
 2 does this, but there are these problems"; is that fair?  
 3 **A.** Yes.  
 4 **Q.** Okay. Now, during the court process, when individual  
 5 subpostmasters and mistresses went to the Criminal Court  
 6 of Appeal, Simon Clarke advices were revealed at that  
 7 stage and one of them mentioned the question of the  
 8 integrity or the credibility of Mr Jenkins, and that was  
 9 in around 2013. Were you ever asked any questions about  
 10 whether Mr Jenkins was a person that was providing  
 11 honest evidence?  
 12 **A.** No.  
 13 **Q.** Was it ever brought to your attention that there was  
 14 a question about his credibility?  
 15 **A.** No.  
 16 **Q.** Was it ever brought to your attention that there was any  
 17 issue with his accuracy, in other words getting things  
 18 right?  
 19 **A.** No.  
 20 **Q.** Was there any investigation that you're aware of within  
 21 Fujitsu of Mr Jenkins' accuracy, credibility and  
 22 integrity?  
 23 **A.** No.  
 24 **Q.** Was that ever brought to your attention?  
 25 **A.** No.

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1 **Q.** You've seen statements, therefore, that have been given  
 2 by Ms Thomas and Mr Jenkins, yes?  
 3 **A.** Yes.  
 4 **Q.** You are aware that their roles were to provide, if you  
 5 like, the court-facing evidence, yes?  
 6 **A.** Yes.  
 7 **Q.** Okay. So it may be I asked a bad question and, if so,  
 8 I'll have another go at putting it, all right? Would  
 9 you have expected those witnesses to provide any other  
 10 information about problems in the system that may be  
 11 useful for the court process?  
 12 **A.** Yes.  
 13 **Q.** Okay. So we've got, really, two things: ARQ data that  
 14 you're providing, yes?  
 15 **A.** Yes.  
 16 **Q.** And then an overlay of any other information that may be  
 17 necessary for the court process?  
 18 **A.** Yes, definitely.  
 19 **Q.** So that would mean that, let me see, Ms Thomas and  
 20 Mr Jenkins, if they believed that there were -- how can  
 21 I put it -- a bunch of problems with the system that the  
 22 defence need to know about, you'd be expecting them to  
 23 provide that information?  
 24 **A.** Yes.  
 25 **Q.** All right. In the same way, you'd be expecting them to

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1 **Q.** Rather than going through all of that regarding  
 2 Ms Thomas, the same questions for Ms Thomas?  
 3 **A.** Yeah. The same. It would be the same: no.  
 4 **Q.** Now, I'm going to take you to a document which is going  
 5 back to 2010. As we've just discussed, that's when you  
 6 joined this particular team, okay? The document is  
 7 POL00028838. Now, you'll have that on your screen. I'm  
 8 afraid the document is a little grey, if you like. It's  
 9 sort of a little hard to read because it's perhaps been  
 10 copied too many times, or something similar. All right,  
 11 but you can see there that it's headed  
 12 "Receipts/Payments Mismatch issue notes", okay?  
 13 Then we see attendees at this particular meeting and  
 14 a variety of names there. Can we go to the Fujitsu  
 15 names? You'll see there at the bottom Mike Stewart, was  
 16 he someone that you were familiar with?  
 17 **A.** I know the name.  
 18 **Q.** In what capacity?  
 19 **A.** That he was a Service Delivery Manager, sorry, but  
 20 I didn't have no interactions with him.  
 21 **Q.** John Simpkins?  
 22 **A.** Yes.  
 23 **Q.** Dealings with him?  
 24 **A.** No, not really. I know that he worked in the SSC  
 25 Department.

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1 **Q.** Right. Now, regarding your own line management, were  
2 these within your own line management? Were they people  
3 that were above Ms Munro or sideways, working with her?  
4 Can you recall where they existed, if you like, on  
5 an organogram?  
6 **A.** I wouldn't say they were above her. They were to the  
7 side.  
8 **Q.** To the side?  
9 **A.** Yes.  
10 **Q.** Now, Gareth Jenkins we can jump over him because we've  
11 discussed that. He is within your statement as someone  
12 that you were aware of in the way we've discussed. Then  
13 underneath that was Mark Wright, Fujitsu Technical  
14 Specialist; someone you came across?  
15 **A.** No.  
16 **Q.** All right. Then it goes on to say, "What is the issue?"  
17 So the period of time we're talking about in relation to  
18 this, we've looked at variously during the course of  
19 this Inquiry, this is 2010, we think around August 2010,  
20 all right:  
21 "What is the issue?"  
22 "Discrepancies showing at the Horizon counter  
23 disappear when the branch follows certain process steps,  
24 but will still show within the back end branch account.  
25 This is currently impacting circa 40 branches since  
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1 in fact they could have a loss or a gain.  
2 "Our accounting systems will be out of sync with  
3 what is recorded at the branch.  
4 "If widely known, could cause a loss of confidence  
5 in the Horizon system by branches.  
6 "Potential impact upon ongoing legal cases where  
7 branches after disputing the integrity of Horizon Data.  
8 "It could provide branches ammunition to blame  
9 Horizon for future discrepancies."  
10 Okay? It may be a bit of an understatement but the  
11 impact looks pretty significant?  
12 **A.** Yes, it does.  
13 **Q.** Okay. Now, as we've looked at within your statement,  
14 you came into this particular part of work within  
15 Fujitsu in July 2010?  
16 **A.** Yes.  
17 **Q.** You've said within your statement that you were made  
18 aware -- paragraph 24, we've discussed this before --  
19 you would have been made aware of bugs, errors or  
20 defects in Horizon, is what you've said then. So, help  
21 us with this particular one, this submarine bug, which  
22 can't be detected by branches, a significant one, you  
23 agree; a serious one, you agree?  
24 **A.** Yes.  
25 **Q.** Was that something you were alerted to in 2010, not long  
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1 migration onto Horizon Online with an overall cash value  
2 of circa £20k loss. This issue will only occur if  
3 a branch cancels the completion of the trading period,  
4 but within the same session continues to roll into a new  
5 balance period."  
6 Then you'll see that underneath that:  
7 "At this time we have not communicated with the  
8 branches affected and we do not believe they are  
9 exploiting this bug intentionally."  
10 Now, top of the next page, please, so second page on  
11 Relativity, where it says -- right, if we look at the  
12 top there, it says:  
13 "Note at this point nothing into [that's the word it  
14 says there] feeds POLSAP and Credence, so in effect the  
15 POLSAP and Credence shows a discrepancy, whereas the  
16 Horizon system in the branch doesn't. So the branch  
17 will then believe they have balanced."  
18 Then just lastly, in relation to this, look at  
19 "Impact", please, at the bottom of that particular page,  
20 so the second page within Relativity, "Impact". If you  
21 can highlight that, please, I'd be very grateful. Thank  
22 you.  
23 Under "Impact", so what does this mean, is where  
24 we've now got to within this document:  
25 "The branch has appeared to have balanced, whereas  
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1 after you came into this particular post?  
2 **A.** I can't remember.  
3 **Q.** If you had been, would this have caused you some  
4 concerns?  
5 **A.** Oh, definitely, yes.  
6 **Q.** Yes. You've mentioned, in relation to Mr Blake's  
7 questions today -- a number of times he asked you that  
8 sort of question, which is: "Would this have caused you  
9 concern?" Who should, within the system that you were  
10 working within -- within Fujitsu, who should have kept  
11 you up-to-date with these things? Who should have been  
12 talking to you about these things? In other words, who  
13 was responsible for not dealing with these matters and  
14 discussing them with you?  
15 **A.** I would say management.  
16 **Q.** Management. From your perspective, would that have been  
17 Ms Munro or would it have been others above her?  
18 **A.** I would say others above.  
19 **Q.** Why not Ms Munro, just out of interest? Why not her as  
20 well, if you like?  
21 **A.** Her as well, yeah.  
22 **Q.** Fine. All right. I know this is difficult because, of  
23 course, you're still working for Fujitsu, so we all  
24 understand that.  
25 Now, when you left that particular team -- we've  
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1 looked at this before, paragraph 8, "I went on leave in  
 2 2016", and you then came back into a different role,  
 3 okay?  
 4 **A.** Yes.  
 5 **Q.** All right. By the time you've gone on leave in April  
 6 2016, who's taking over from your role? In other words,  
 7 the role of providing data, ARQ data, for potential  
 8 prosecutions or civil actions by POL?  
 9 **A.** So at that time, our team had expanded because,  
 10 obviously, we had taken on more work. So there were  
 11 other people within the team, as well.  
 12 **Q.** Right. So when you left, there was other capacity --  
 13 **A.** Yes.  
 14 **Q.** -- in the people capacity --  
 15 **A.** Yes.  
 16 **Q.** -- if I can put it that way? Right.  
 17 Now, we know that the Post Office stopped  
 18 prosecuting cases itself, in other words taking people  
 19 itself to courts, and the matters were left to the Crown  
 20 Prosecution Service within England and Wales and other  
 21 prosecution authorities in parts of the devolved  
 22 jurisdiction, okay?  
 23 Cases are still being prosecuted of subpostmasters,  
 24 this time by the CPS, using data from Fujitsu. Who is  
 25 in charge of that? Who is dealing with that now?

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1 **A.** I don't know.  
 2 **Q.** Now, we've looked at and examined the question -- as has  
 3 Mr Blake to a large extent, this morning, as well --  
 4 about the level of bugs, errors, defects within the  
 5 system that were brought to your attention, okay, and  
 6 you've said in your statement that they would have been  
 7 brought to your attention, and so on.  
 8 Were you aware that the staff members at Fujitsu  
 9 that the capacity and ability to alter branch data --  
 10 **A.** No.  
 11 **Q.** -- remotely?  
 12 **A.** No.  
 13 **Q.** Was that ever explained to you?  
 14 **A.** No.  
 15 **Q.** You're aware within all of these court proceedings that  
 16 that's a matter that has been discussed, the question of  
 17 remote access into branches and altering branch data?  
 18 You're aware that that's been discussed?  
 19 **A.** It has -- yes, I'm aware of it.  
 20 **Q.** That's not something you've ever asked about?  
 21 **A.** No.  
 22 **Q.** About your period of time, when you're looking at these  
 23 matters, providing data, you've never asked whether the  
 24 data had been altered in any way by someone at Fujitsu?  
 25 **A.** No.

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1 **Q.** Are there people still in post within Fujitsu who were  
 2 responsible for not making sure that you're aware of  
 3 these issues?  
 4 **A.** No, they're not in post.  
 5 **Q.** To your knowledge, is the Horizon system still being  
 6 used to provide data that is used in court proceedings?  
 7 **A.** Yes, I think it is.  
 8 **MR STEIN:** Thank you, Mrs Sangha.  
 9 **SIR WYN WILLIAMS:** Thank you, Mr Stein.  
 10 Are there questions from anyone else?  
 11 **MR BLAKE:** No, sir. That's all for today.  
 12 **SIR WYN WILLIAMS:** Well, thank you very much, Mrs Sangha,  
 13 for providing a witness statement, and coming to the  
 14 Inquiry to answer a good number of questions. I'm very  
 15 grateful to you.  
 16 So we'll adjourn now until 10.00 tomorrow morning.  
 17 **MR BLAKE:** Thank you very much, sir.  
 18 (12.34 pm)  
 19 (The hearing adjourned until 10.00 am  
 20 the following day)  
 21  
 22  
 23  
 24  
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64/3          81/22 85/12 85/17          86/2 86/19 88/2 88/2          89/3 92/17 92/19  <b>Ms Bains</b> [1] 6/25  <b>Ms Munro</b> [4] 63/15          89/3 92/17 92/19  <b>Ms Sangha</b> [3] 1/9          1/15 81/22  <b>Ms Sangha's</b> [1]</p>	<p>55/16  <b>Ms Thomas</b> [15] 55/9          55/10 57/1 57/1 57/4          57/9 57/17 57/21 64/3          85/12 85/17 86/2          86/19 88/2 88/2  <b>much</b> [23] 1/4 1/12          1/15 2/4 10/2 11/2          16/7 19/6 22/1 22/2          34/18 39/18 48/2          51/10 54/13 54/16          60/22 67/4 67/14 69/8          69/10 95/12 95/17  <b>Munro</b> [7] 63/1 63/6          63/15 71/9 89/3 92/17          92/19  <b>my</b> [24] 4/7 6/21 9/15          13/20 19/14 29/3 29/5          29/9 31/9 31/16 35/8          40/16 48/20 49/13          53/17 62/11 63/1 69/9          71/3 72/1 75/23 79/13          81/14 85/6  <b>myself</b> [4] 9/20 38/22          64/13 77/18</p> <hr/> <p><b>N</b>  <b>name</b> [8] 1/13 2/9          16/10 34/23 50/14          74/14 79/13 88/17  <b>names</b> [3] 25/25          88/14 88/15  <b>National</b> [1] 12/16  <b>NBSC</b> [2] 12/15          12/16  <b>near</b> [3] 33/24 55/22          56/7  <b>necessary</b> [2] 73/5          86/17  <b>need</b> [19] 33/19 36/5          37/8 38/11 38/16          38/23 42/12 44/19          45/17 45/18 45/25          46/3 46/10 46/11 65/2          68/11 73/18 83/10          86/22  <b>needed</b> [2] 39/11          39/11  <b>needs</b> [4] 14/4 21/19          36/10 44/14  <b>nervous</b> [1] 29/25  <b>nervousness</b> [1]          28/20  <b>net</b> [1] 67/25  <b>never</b> [3] 53/17 63/23          94/23  <b>nevertheless</b> [1]          17/1  <b>new</b> [6] 15/16 20/19          25/14 33/10 82/13          90/4  <b>Newsome</b> [2] 77/12          80/2  <b>next</b> [12] 6/23 36/8</p>	<p>38/12 38/14 38/24          49/18 49/19 51/5          59/12 62/20 71/1          90/10  <b>Nield</b> [1] 9/11  <b>no</b> [93] 1/6 7/1 8/2          8/5 8/25 9/14 9/23          10/6 11/16 11/18          13/15 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<b>obvious</b> [2] 14/16          65/23  <b>obviously</b> [13] 4/25          24/14 26/18 32/14          43/23 69/11 69/21          69/21 73/24 76/1 79/9          79/11 93/10  <b>Occasionally</b> [1]          22/8  <b>occur</b> [1] 90/2  <b>occurred</b> [1] 33/14  <b>occurrences</b> [4]          32/20 33/14 33/16          34/4  <b>October</b> [8] 33/8          49/11 55/5 58/3 58/4          58/6 58/8 58/25  <b>October 2010</b> [1]          33/8  <b>odd</b> [2] 30/20 53/19  <b>off</b> [3] 45/18 63/10          76/24  <b>offer</b> [1] 15/7  <b>office</b> [49] 3/5 3/18          4/8 4/9 7/12 9/16 18/8          18/25 19/1 28/4 28/10          28/10 30/3 30/6 30/11          32/2 43/20 43/24 44/4          44/14 44/17 46/25          47/4 50/15 50/21          51/21 56/1 57/4 57/13          58/17 65/18 67/19          68/11 70/16 76/14          77/1 77/15 78/8 78/11          78/12 78/18 78/22          79/3 79/19 80/5 80/6          82/9 82/23 93/17  <b>Office's</b> [1] 85/1  <b>officer</b> [9] 2/21 3/8          47/24 50/1 50/3 50/10          50/16 51/10 82/9  <b>official</b> [1] 66/24  <b>often</b> [2] 10/21 74/15</p>
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53/17 54/4 62/11 80/14 82/6 82/22 91/14</p> <p><b>particular [31]</b> 4/14 12/22 13/4 14/1 15/18 18/18 24/20 34/25 35/1 35/15 35/21 43/16 48/7 62/5 62/15 65/20 66/5 66/11 67/2 67/17 68/24 69/6 70/15 83/3 88/6 88/13 90/19 91/14 91/21</p>	<p>92/1 92/25</p> <p><b>particularly [2]</b> 43/5 61/13</p> <p><b>parts [3]</b> 35/17 35/19 93/21</p> <p><b>pass [1]</b> 80/1</p> <p><b>passed [3]</b> 10/8 51/2 79/6</p> <p><b>passing [1]</b> 13/8</p> <p><b>password [1]</b> 17/23</p> <p><b>Pat [2]</b> 24/24 25/1</p> <p><b>pausing [6]</b> 10/23 12/8 13/12 15/18 23/4 37/13</p> <p><b>Payments [1]</b> 88/12</p> <p><b>PC0152376 [2]</b> 12/4 12/9</p> <p><b>PC0200468 [2]</b> 20/9 24/19</p> <p><b>PC0204310 [2]</b> 32/16 35/2</p> <p><b>PC0205805 [1]</b> 58/10</p> <p><b>PEAK [23]</b> 11/23 11/24 12/10 20/2 23/25 24/5 25/7 25/17 25/19 27/12 27/19 32/16 32/16 32/23 33/11 33/17 34/7 35/3 38/14 58/2 58/3 72/24 73/14</p> <p><b>PEAKs [1]</b> 37/7</p> <p><b>pending [1]</b> 28/17</p> <p><b>Penelope [2]</b> 6/7 6/13</p> 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[15]</b> 12/25 21/14 37/6 61/3 61/6 61/7 61/12 61/13 61/16 61/19 64/9 67/11 71/19 82/14 86/13</p> <p><b>two paragraphs [1]</b> 82/14</p> <p><b>type [2]</b> 15/11 33/21</p> <p><b>types [2]</b> 33/20 33/23</p> <p><b>typical [2]</b> 9/21 63/21</p> <p><b>typically [1]</b> 5/9</p> <hr/> <p><b>U</b></p> <p><b>ultimately [3]</b> 25/21 49/9 51/12</p> <p><b>um [1]</b> 10/15</p> <p><b>unable [2]</b> 50/8 70/21</p> <p><b>unaware [1]</b> 58/14</p> <p><b>uncomfortable [1]</b> 71/16</p> <p><b>under [4]</b> 13/25 15/1 26/6 90/23</p> <p><b>underlying [2]</b> 12/10 29/8</p> <p><b>undermine [1]</b> 15/8</p> <p><b>underneath [2]</b> 89/13 90/6</p> <p><b>understand [7]</b> 28/16 44/17 69/22 75/15 83/19 84/5 92/24</p> <p><b>understanding [8]</b> 10/23 16/5 16/23 17/1 19/3 81/13 82/24 85/17</p> <p><b>understatement [1]</b> 91/10</p> <p><b>understood [1]</b> 57/2</p> <p><b>undertake [1]</b> 16/13</p> <p><b>undertaking [1]</b> 16/5</p> <p><b>undertook [1]</b> 53/9</p> <p><b>unhappy [1]</b> 46/7</p> 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10/21 11/5 16/23 32/24 34/9 37/16 47/8 49/18 83/16 95/6 95/6</p> <p><b>useful [1]</b> 86/11</p> <p><b>user [6]</b> 5/15 22/5 22/7 58/12 59/2 60/14</p> <p><b>using [3]</b> 42/16 52/9 93/24</p> <p><b>usually [1]</b> 41/3</p> <hr/> <p><b>V</b></p> <p><b>value [1]</b> 90/1</p> <p><b>variety [1]</b> 88/14</p> <p><b>various [9]</b> 2/18 9/3 17/9 31/6 43/6 48/12 49/3 67/7 74/15</p> <p><b>variously [1]</b> 89/18</p> <p><b>very [39]</b> 1/4 1/12 1/15 2/4 3/25 10/2 14/2 16/1 16/7 19/6 20/4 21/10 25/6 30/18 30/25 31/2 36/2 37/9 39/17 39/18 48/2 49/18 50/17 51/6 51/10 54/13 54/16 58/8 60/22 67/14 69/24 72/8 78/6 81/5 83/5 90/21 95/12 95/14 95/17</p> <p><b>via [2]</b> 10/19 50/7</p> <p><b>Victoria [1]</b> 80/10</p> <p><b>volume [2]</b> 32/23 34/7</p> <hr/> <p><b>W</b></p> <p><b>Wales [1]</b> 93/20</p> <p><b>want [5]</b> 44/6 54/12 70/8 78/6 82/2</p> <p><b>warning [2]</b> 21/18 66/3</p>	<p><b>was [166]</b></p> <p><b>wasn't [22]</b> 11/18 13/15 13/20 14/25 23/9 24/6 24/7 27/1 27/1 29/9 30/20 40/15 46/20 52/13 57/20 64/9 64/12 64/17 69/10 72/12 75/16 83/2</p> <p><b>Wattville [3]</b> 55/21 55/23 58/4</p> <p><b>way [11]</b> 18/17 21/7 53/19 57/20 66/13 72/9 77/25 86/25 89/12 93/16 94/24</p> <p><b>we [226]</b></p> <p><b>we'll [6]</b> 11/4 12/9 19/9 20/8 34/22 95/16</p> <p><b>we're [20]</b> 1/8 3/16 19/24 20/2 20/3 32/4 38/25 44/10 49/11 58/8 61/12 64/19 67/10 72/15 73/12 74/7 76/6 78/4 79/16 89/17</p> <p><b>we've [37]</b> 7/21 9/4 12/1 24/24 31/5 35/3 35/19 39/10 41/6 43/11 48/13 50/1 51/16 52/23 56/12 56/19 57/13 58/5 58/5 59/4 67/6 69/16 70/3 72/7 74/14 74/18 82/14 86/13 88/5 89/10 89/12 89/18 90/24 91/13 91/18 92/25 94/2</p> <p><b>website [1]</b> 2/5</p> <p><b>Wednesday [1]</b> 77/2</p> <p><b>week [2]</b> 37/14 51/5</p> <p><b>well [10]</b> 5/16 44/18 52/19 52/20 87/1 92/20 92/21 93/11 94/3 95/12</p> <p><b>Welsh [3]</b> 25/24 28/15 30/8</p> <p><b>went [5]</b> 75/10 75/15 82/11 87/5 93/1</p> <p><b>were [95]</b> 3/4 3/17 4/24 6/1 6/1 6/6 6/7 6/9 6/10 6/10 7/15 7/18 8/24 11/14 11/19 13/12 13/16 13/17 14/22 16/5 17/15 18/1 18/2 23/5 24/19 28/22 28/23 29/18 30/18 30/19 31/2 31/2 31/19 39/18 40/10 43/19 43/21 54/24 55/3 55/7 56/22 57/3 58/9 58/20 61/12 61/13 61/15 61/16 61/19 61/19 61/20 62/25 64/6 64/14 67/7 69/19</p>	<p>69/21 73/25 75/12 76/2 77/16 77/17 77/19 77/24 78/1 78/1 78/19 80/22 80/24 80/25 81/3 82/7 83/10 83/22 84/14 84/14 86/4 86/20 87/6 87/9 88/16 89/1 89/2 89/3 89/6 89/6 89/12 91/17 91/25 92/9 93/10 93/19 94/5 94/8 95/1</p> <p><b>weren't [6]</b> 16/24 24/12 29/7 69/6 72/10 77/18</p> <p><b>what [54]</b> 3/21 3/25 4/6 4/20 5/8 5/20 6/9 8/17 9/12 10/7 10/12 10/13 11/24 16/5 29/17 31/5 31/15 34/14 36/19 37/4 37/14 37/16 37/19 41/15 42/1 43/21 45/4 45/5 45/12 56/21 57/3 57/13 63/11 63/18 63/24 68/5 71/19 73/18 73/25 75/10 75/15 75/17 75/18 75/18 75/20 78/16 79/11 79/12 88/18 89/16 89/21 90/23 91/3 91/20</p> <p><b>what's [1]</b> 73/7</p> <p><b>whatever [2]</b> 29/16 54/5</p> <p><b>when [26]</b> 10/1 10/8 11/19 12/19 13/5 13/12 20/5 29/14 32/4 46/20 47/14 48/25 52/13 54/12 58/2 60/8 62/18 62/18 82/21 83/9 87/4 88/5 89/23 92/25 93/12 94/22</p> <p><b>where [18]</b> 3/17 7/11 7/15 11/4 13/24 14/6 14/11 15/3 18/17 41/8 57/12 64/2 82/15 85/16 89/4 90/11 90/23 91/6</p> <p><b>whereas [2]</b> 90/15 90/25</p> <p><b>whether [13]</b> 12/8 28/5 45/7 45/18 47/21 50/15 56/23 63/8 70/13 77/3 84/3 87/10 94/23</p> <p><b>which [28]</b> 14/20 17/13 19/16 20/15 21/23 25/6 25/9 36/8 38/1 39/5 41/1 41/7 46/9 48/22 49/25 50/19 56/3 62/2 65/13 65/14 65/18 71/8 79/21 82/4 85/2 88/4 91/21 92/8</p>	<p><b>while [5]</b> 16/19 20/25 30/12 33/4 79/17</p> <p><b>whilst [2]</b> 28/14 28/17</p> <p><b>who [42]</b> 6/6 7/16 7/21 8/12 9/17 12/24 14/22 16/24 17/1 18/14 25/2 26/19 28/21 29/11 29/23 30/25 31/1 38/20 39/12 40/19 51/3 52/9 52/14 61/13 61/16 62/25 63/9 65/8 71/9 71/20 72/17 79/3 79/23 80/5 80/10 92/9 92/10 92/11 92/12 93/24 93/25 95/1</p> <p><b>who's [1]</b> 93/6</p> <p><b>why [24]</b> 5/23 5/24 26/14 31/10 31/23 32/13 34/14 43/18 49/6 54/2 62/9 64/8 64/24 65/4 69/5 69/19 75/1 75/16 79/8 80/16 81/4 81/10 92/19 92/19</p> <p><b>widely [1]</b> 91/4</p> <p><b>wider [1]</b> 41/8</p> <p><b>will [60]</b> 2/4 2/6 7/14 11/13 13/4 15/7 15/10 20/10 20/11 22/2 23/25 30/1 30/11 32/20 32/20 33/11 33/12 33/13 33/14 34/4 34/4 34/5 35/6 36/3 36/5 36/10 37/8 38/11 38/16 40/25 42/6 42/12 42/17 42/19 42/20 42/24 43/1 44/19 44/20 46/10 47/21 54/9 59/22 60/16 60/20 60/21 62/1 62/2 62/17 64/21 68/2 68/3 68/19 73/22 77/3 77/3 89/24 90/2 90/17 91/2</p> <p><b>Windows [1]</b> 17/24</p> <p><b>within [45]</b> 13/21 18/7 19/18 22/1 29/13 34/23 41/4 48/24 52/10 63/12 63/19 63/21 63/23 69/15 72/4 75/2 76/3 77/17 77/21 77/24 80/21 81/5 82/15 83/17 84/15 84/17 85/16 87/20 89/2 89/11 89/24 90/4 90/20 90/24 91/13 91/14 91/17 92/9 92/10 92/10 93/11 93/20 94/4 94/15 95/1</p> <p><b>without [3]</b> 26/8 58/17 60/11</p>
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<p><b>W</b></p> <p><b>WITN10300100 [3]</b> 1/18 56/12 82/4</p> <p><b>witness [65]</b> 1/16 1/17 5/14 6/3 6/12 6/15 11/2 11/5 14/8 15/9 15/11 15/25 16/6 16/11 19/8 19/10 32/10 39/10 44/6 44/18 45/8 45/16 46/11 46/15 46/21 46/22 47/2 47/15 47/21 47/25 48/1 50/12 51/8 52/10 53/12 53/16 53/18 54/4 54/6 54/7 54/23 54/24 55/2 55/5 55/19 56/11 56/14 56/17 56/22 56/23 57/2 57/4 57/6 57/8 57/10 57/11 64/4 64/5 66/7 66/8 72/2 72/10 72/13 85/12 95/13</p> <p><b>witnessed [6]</b> 55/13 56/16 56/24 57/8 57/18 74/22</p> <p><b>witnesses [2]</b> 70/17 86/9</p> <p><b>wonder [1]</b> 12/8</p> <p><b>wonderful [1]</b> 1/6</p> <p><b>wondering [1]</b> 6/19</p> <p><b>word [1]</b> 90/13</p> <p><b>wording [2]</b> 52/22 52/25</p> <p><b>words [22]</b> 11/5 12/14 15/13 17/6 19/9 48/6 49/4 49/18 49/19 49/20 50/22 52/10 53/1 56/8 58/6 59/4 66/2 74/20 87/17 92/12 93/6 93/18</p> <p><b>work [12]</b> 2/11 14/24 22/2 31/21 42/22 45/23 46/7 77/9 80/14 84/24 91/14 93/10</p> <p><b>workaround [18]</b> 27/21 28/5 28/20 28/21 28/23 34/25 36/13 37/2 37/9 38/4 38/12 38/24 39/7 40/5 40/22 41/5 41/9 42/11</p> <p><b>workarounds [4]</b> 29/12 39/5 39/6 43/5</p> <p><b>worked [5]</b> 6/7 11/6 80/5 84/9 88/24</p> <p><b>working [7]</b> 5/18 7/11 7/16 42/21 89/3 92/10 92/23</p> <p><b>works [1]</b> 21/7</p> <p><b>workstation [5]</b> 17/21 18/6 18/9 40/24 52/5</p> <p><b>workstations [1]</b></p>	<p>17/13</p> <p><b>worry [1]</b> 33/19</p> <p><b>worth [2]</b> 11/9 13/8</p> <p><b>would [80]</b> 4/22 4/22 5/1 5/2 5/3 5/21 7/6 7/17 9/15 9/17 9/18 9/19 13/22 15/20 18/19 26/6 27/24 29/5 29/11 29/14 29/15 29/20 30/6 31/12 31/18 33/15 37/18 37/19 38/19 38/20 38/23 41/3 41/18 45/12 45/17 45/18 46/22 46/23 49/3 51/2 51/17 52/8 52/20 52/20 53/1 53/20 54/5 58/19 58/20 62/12 62/14 62/16 63/14 63/16 63/24 66/2 66/9 66/22 71/5 71/14 75/5 75/7 75/9 75/25 76/17 81/12 82/11 85/5 85/18 86/8 86/19 88/3 91/19 92/3 92/8 92/15 92/16 92/17 92/18 94/6</p> <p><b>wouldn't [6]</b> 13/20 49/5 53/11 62/11 77/23 89/6</p> <p><b>Wright [1]</b> 89/13</p> <p><b>write [1]</b> 12/6</p> <p><b>writing [1]</b> 21/18</p> <p><b>wrong [2]</b> 75/10 75/15</p> <p><b>wrote [1]</b> 55/10</p> <hr/> <p><b>Y</b></p> <p><b>yeah [33]</b> 10/15 10/15 19/4 24/14 27/6 29/20 34/13 34/19 36/1 36/1 36/18 37/20 37/20 38/8 40/13 40/13 40/13 41/25 43/15 46/18 47/19 48/10 51/14 56/15 66/18 66/20 67/1 69/2 74/6 81/3 84/6 88/3 92/21</p> <p><b>year [7]</b> 19/25 36/9 38/13 38/14 38/24 67/20 76/13</p> <p><b>years [3]</b> 10/21 13/1 83/22</p> <p><b>yes [154]</b></p> <p><b>yesterday [1]</b> 77/10</p> <p><b>yet [2]</b> 23/1 41/3</p> <p><b>you [442]</b></p> <p><b>you'd [2]</b> 86/22 86/25</p> <p><b>you'll [5]</b> 64/1 84/19 88/7 88/15 90/6</p> <p><b>you're [24]</b> 6/17 7/25 25/20 25/22 26/14 34/24 35/23 39/18</p>	<p>46/25 47/14 47/20 50/13 56/18 65/2 65/4 82/18 84/19 86/14 87/20 92/23 94/15 94/18 94/22 95/2</p> <p><b>you've [20]</b> 6/2 23/5 56/19 69/24 70/9 71/9 72/8 74/21 84/7 84/13 85/22 85/23 86/1 91/17 91/20 92/6 93/5 94/6 94/20 94/23</p> <p><b>your [83]</b> 1/12 1/24 2/2 2/9 4/6 5/14 6/1 6/6 7/2 9/13 9/24 10/3 10/23 16/2 16/23 19/3 26/4 26/16 27/1 27/4 29/2 31/8 31/15 31/21 32/2 34/23 36/23 38/21 40/4 40/12 40/21 41/12 43/4 43/11 43/14 45/24 46/8 46/10 49/1 52/25 53/4 53/12 54/25 55/2 56/11 56/17 62/7 63/7 63/19 64/1 72/4 72/8 74/9 74/14 75/2 77/17 80/3 80/25 81/5 81/25 82/3 82/6 82/15 82/22 84/14 84/17 85/17 87/13 87/16 87/24 88/7 89/1 89/2 89/11 91/13 91/17 92/16 93/6 94/5 94/6 94/7 94/22 95/5</p> <p><b>yourself [18]</b> 8/4 8/7 9/2 40/1 44/11 45/2 45/13 46/8 46/15 47/12 49/4 57/21 67/12 68/16 71/22 72/20 76/9 81/7</p> <hr/> <p><b>Z</b></p> <p><b>zoom [1]</b> 60/2</p>		
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