

Fujitsu Services

Report on Cleveleys Post Office

Ref: IA/REP/047

Version: 1.0

Company in Confidence

Date: 01/09/04

0.0 Document Control

0.1 Document History

Version No.	Date	Reason for Issue	Associated CP/PinICL
0.1	29/03/04	Initial Draft	
0.2	01/04/04	Updated	
0.3	03/08/04	Updated following request for assistance from POL Counsel	
1.0	01/09/04	Approved following case closure	

0.2 Review Details

Review Comments by :	
Review Comments to :	Jan Holmes

Mandatory Review Authority	Name
Optional Review / Issued for Information	

(*) = Reviewers that returned comments

0.3 Associated Documents

Reference	Vers	Date	Title	Source

Unless a specific version is referred to above, reference should be made to the current approved versions of the documents.

0.4 Abbreviations/Definitions

Abbreviation	Definition
PO	Post Office Limited
POA	Post Office Account

0.5 Changes in this Version

Version	Changes

0.6 Changes Expected

Changes
Comment from document reviewers

0.7 Table of Contents

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1.0 Introduction

Post Office Account provides support to Post Office Security Investigations in their legal actions against Post Masters. Generally speaking this is in the form of audit data, witness statements and, if required, appearances in court.

Occasionally Post Office will request special assistance in matters that do not fit the standard service described above. The dispute at Cleveleys revolves around the Post Master being dismissed by PO in November 2000, ostensibly for 'unacceptable losses', her counter-claim for damages for unfair dismissal and her subsequent refusal to return Horizon equipment to Post Office as she felt that it's contents would somehow uphold her claims.

2.0 Scope

This report does not set out to address the case itself, merely what POA have provided as support and some of the issues identified in providing that assistance. It does make recommendations as to how future involvement by POA in these non-standard cases might be better managed.

At the time of writing this report attempts were being made by PO to reach an out of court settlement with the Post Master.

3.0 Management Summary

3.1 The Experts Report

The Expert, who was supposed to be jointly appointed, has taken a very one-sided view of life and has drawn conclusions that are based on a paper review of HSH call logs covering the period from initial rollout of the office to November 2000. In some cases his analysis of the call logs is incomplete and stops at the point where it supports his opinion.

In his original Report the Expert made a number of general assertions that are difficult to refute since there is no audit data available that would allow a point-by-point rejection of his assertions. This means that the argument would be reduced to assertion and counter assertion, probably in court and ultimately resulting in a lose-lose situation for POL and POA. He has also drawn conclusions about the Horizon System Helpdesk without considering fully the primary objective of the HSH, ie to get the outlet up and running as quickly as possible and minimise business interruption to the PM.

POA cannot prove, in the literal sense, that the system operated correctly during 2000 since we do not have transaction data that will demonstrate that fact. Equally, any proving that we could do, for example, by design walkthroughs with the Expert, would prove nothing since it would be a 2004 system baseline that was being considered, not one from 2000. We can infer that it was since we are not aware of any contemporary POL prosecutions failing due to the system not operating correctly.

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When confronted with a comparative analysis of HSH calls for all 6 counter outlets the Expert dismissed it and implied that we might have deliberately withheld the information from him in the first place. This was rejected strongly in our final response.

Some of the terminology used by the Expert is also not what POA would consider to be objective or supported by substantive evidence or benchmarks. An example of this is his statement that 'installed equipment was clearly defective', a statement presented in such a way as to reduce the debate to a 'no it wasn't, yes it was' level.

We have offered to host him at any of our locations so he can analyse HSH data direct, speak to the experts and walkthrough the problem management cycle for himself. He will not have seen this offer since it was contained in the email that accompanied our final response and this has not been passed on to the Expert pending the outcome of an out of Court settlement offer by POL to the PM. [DN 01/04/04; Confirmed with Jim Cruise that the recommended 3 months salary offer is now with POL for approval prior to being made to the PM]

3.2 POA Involvement

Arguably we were brought into this too late. Our first involvement was August 2003, some 6 months after the court appointed the Expert and some three years after the original dismissal of the PM. No doubt some of this delay is attributable to the workings of the Courts but even so POL might consider our earlier involvement, even if it's just as a 'heads up' to a situation that might become more active.

The problem of audit data deletion will not apply on future cases since we no longer delete TMS transaction data after 18 months although this change only affects data archived after 18th May 2002.

4.0 Chronology

Date	Detail
15/08/03	POA initial involvement following request by PO for Witness Statement declaring that there will be no transaction data on some Horizon equipment that the Post Master (PM) was refusing to return to PO since it would support her counter-claim for unfair dismissal. It was known at this time that a court order had been made for a computer expert to look at the losses at Cleveleys and whether they were caused by the Horizon equipment as was being claimed by the PM.
15/08/03	JH brought issue to attention of CLS and questioned legal position wrt 3 rd party having access to the equipment to conduct forensic examination.
20/08/03	PO (Jim Cruise) sent fax formally requesting witness statement and background information from their solicitors (dated 17/02/03) surrounding the appointment of a single Joint Expert be instructed on the issue of liability and causation.
21/08/03	A preliminary report (email) was despatched by JH to JC that identified that we did not have any audit data for Cleveleys for the period in question (02/00 to 11/00) and explaining the issues around trying to 'fire-up' a counter that has been dormant for >35 days (as was the case with this equipment). POA also stated that we would not be prepared to allow a 3 rd party direct access to the counter.
06/02/04	Nothing more was heard for almost 6 months until we received a letter from Post Office containing the Experts report. PO were concerned that the report claimed that the equipment installed at Cleveleys was defective and that the Horizon System Helpdesk (HSH) was more concerned with closing calls than resolving problems. PO feared that if the report went unchallenged it could set a precedent for other cases being progressed against PMs.

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12/02/04	JH/JC discussed situation and JC asked that we respond to Expert's report with anything that might help him change some or all of the opinions expressed in the report. In particular, any comparisons with other similar Outlets that would suggest that Cleveleys was nothing out of the ordinary would be very helpful. JC also confirmed that the equipment had still not been returned to PO and that it was not examined as part of the Expert's review.
12/02/04	JH realised that HSH call logs were still available for the period in question and obtained a call analysis for other 6 counter outlets. The analysis was not conclusive but it did indicate that Cleveleys could not be considered as out of the ordinary with regard to number of calls or the spread of call types.
	There followed a short period during which the Expert's Report was considered within POA.
20/02/04	CLS wrote to Keith Baines with our detailed response to the Expert's Report. The POA response challenged all of the Expert's conclusions and opinions and identified, through the HSH call analysis, that the call profiles for Cleveleys was consistent with other 6 counter outlets.
27/02/04	The Expert replied to our response, through the PO's solicitors, stating that he saw nothing in the POA response that would cause him to change his opinion. There was an implication in his reply that POA had been less than honest in the area of HSH call logs – we had previously stated that data was not available since it was deleted after 18 months. While this is true of audit data sourced from a regulated archive the unregulated Powerhelp files from which the analysis was sourced was available. JC advised POA by email that the Expert's Report was not acceptable to PO and that an application needs to be made to the court for Fujitsu to give evidence about the Horizon system and its working.
12/03/04	A final response to the Experts reply to our original response was prepared and despatched to JC.
19/03/04	JH/JC discussed the case. JC advised that PO were going to make an offer to the PM and were not forwarding our final response to the Expert pending the outcome of their offer.
06/04/04	JC provided email update on case wrt written-off losses and current thinking on how they are approaching case. This information passed to CLS for update.
07/06/04	Following two months of silence I rang POL for update to find that JC has taken early retirement and Mandy Talbot now handling the case for POL.
26/07/04	POL advised of changed nature of J. Wolstenholme's case and need to provide expert witness in Court. Also that Fujitsu may be required to provide same.
28/07/04	This information passed to CLS during Commercial Forum.
03/08/04	Conference call between POL, POA, Masons, Weightmans and POL Counsel to discuss approach.
To 13/08/04	There followed a period of time during which Witness Statements and supporting documentation were produced by Jan Holmes (POA) and Keith Baines (POL) and delivered to Weightmans.
13/08/04	Notified by POL that Post Office had made an increased offer to Mrs Wolstenholmes to drop the case and this had been accepted. Not required in Court.

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5.0 Witness Statement 1

Claimant

J Holmes

First

Exhibits “-”

Dated : August 2004

CLAIM NO CR101947

IN THE BLACKPOOL COUNTY COURT

B E T W E E N

POST OFFICE COUNTERS LIMITED

Claimant

AND

MRS JULIE WOLSTENHOLME

Defendant

WITNESS STATEMENT OF JAN ROBERT HOLMES

I, JAN ROBERT HOLMES of Fujitsu Services, Forest Road, Feltham, Middlesex, TW13 7EJ **STATE AS FOLLOWS:**

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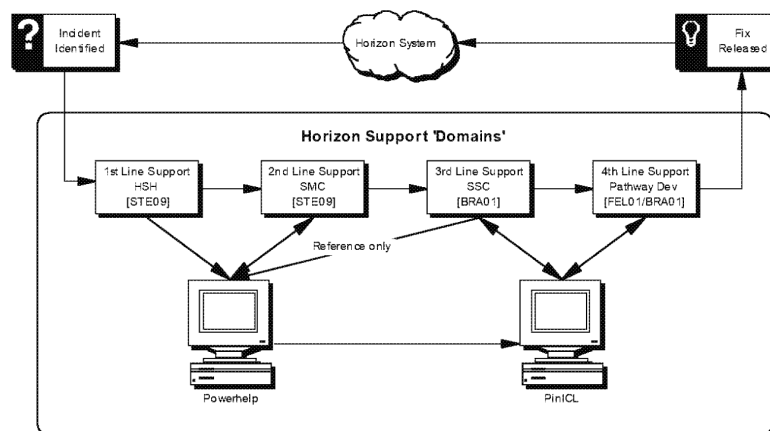
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1. I am employed by Fujitsu Services Limited (“Fujitsu Services”) as Programme Assurance Manager. I have been employed by Fujitsu Services since January 1995. I work for Fujitsu Services and deal with the Post Office Account. I have been asked to provide a description of the support services provided by Fujitsu to the Post Office in respect of the Horizon system.
2. The facts and matters deposed to in this statement are within my own knowledge unless I say so. Insofar as they are within my own knowledge, they are true. Insofar as they are derived from information provided to me by others, they are true to the best of my knowledge and belief.
3. I set out below a glossary of terms used in describing the matters referred to in this statement.

Term/Acronym	Explanation
BRA01	Fujitsu building Bracknell 01
Cleveleys	Runnymede Ave, Thornton Cleveleys, Lancs, FY5 1DF. The Post Office in question
FEL01	Fujitsu building Feltham 01
Front Line	Name associated with the HSH staff actively interfacing with Post Masters on calls.
HIT	Horizon Incident Team (additional 1 st Line). This function established in July 2000 to handle specific types of calls. Now amalgamated with SMC.
HSH	Horizon System Helpdesk (1 st Line) (Fujitsu help desk for Post Masters with technical/system queries to call)
ICL Pathway	The name by which the current Fujitsu Services Post Office Account was known in 2000.
KELs	Known Error Logs
MAN05	Fujitsu building Manchester 05
NBSC	National Business Support Centre (A Post Office run help desk for Post Masters with business queries to call)
OLA	Operational Level Agreement
PinICL	Call management system utilised by SSC and Pathway development for capturing and progressing incidents escalated from SMC (2 nd Line). (Replaced by system called PEAK in 2004)
PM	Post Master
PowerHelp	Call management system utilised by HSH for capturing and progressing call information from PMs
QFP	Quality Filter Process
RMF	Release Management Forum
SMC	System Management Centre (2 nd Line)
SSC	System Support Centre (3 rd Line)
STE09	Fujitsu building Stevenage 09

4. Fujitsu Services Post Office Account (known as ICL Pathway in 2000) provides technical support to Post Office users of the Horizon system through a four-tier model, with the handling of incidents escalating through the tiers depending on the nature of the final resolution action.



5. Each of the domains, referred to as 1st, 2nd, 3rd and 4th Line Support, has its own objectives and responsibilities, both to themselves and each other, and these are defined in an internal Fujitsu document reference CS/FSP/006: End to End Support Process, Operational Level Agreement. The content of this document has been in operation since 1999 and applied to calls raised by the Cleveleys office.
6. While the following paragraphs are written in the present tense, they describe equally what happened in 2000. Whilst there have been changes to the processes and tools since 2000, the basic four-tier model has remained unchanged.

Horizon System Helpdesk HSH/HIT Team (1st Line)

7. Calls are received by the Horizon System Helpdesk (HSH) direct from Post Masters (PM). They can also arrive via the National Business Support Centre (NBSC), a Post Office organisation established for Post Masters to contact if they have business related problems. The NBSC sometimes receives calls that are more relevant to the HSH and these calls are transferred by telephone.

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8. All calls are registered on PowerHelp by the HSH and all calls remain open until such time as a resolution has been reached to the problem and the originating Post Master agrees to the call being closed.
9. An initial diagnosis is conducted by the HSH Front Line while the PM is on the line, using the Horizon reference system co-located with the HSH terminals, and information available on the automated support tool HSHONE, Advice and Guidance information and the Weekly Counter News. If the problem requires further investigation, or an engineer, the call is escalated to the Horizon Incident Team (HIT), a subset of the HSH, and the current call to the PM terminated. [Note: The HIT was established in July 2000 to deal with specific types of calls]
10. Known Error Logs (KELs), developed by the SSC (3rd Line), are used by the HSH and HIT Team, and further attempts are made to resolve the problem with the PM. If resolution is still not possible the call is escalated to 3rd Line support, be that hardware engineers, network specialists or the SSC in BRA01.
11. Calls that are to be escalated to SSC are transferred from the HSH and registered on the PinICL system.

System Management Centre (2nd Line)

12. The SMC deal with the more technically oriented elements of Horizon support including:
 - Network monitoring.
 - Event monitoring and, where possible, identifying problems using SSC KELs.
 - Investigating non-polling Post Office's and reporting back to CS
 - Providing software and POL Type A Reference Data distribution services to the live Horizon estate.

Primary inputs to the SMC include calls that have been escalated from the HIT Team and a number that may also be escalated from the HSH Front Line.

System Support Centre (3rd Line)

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13. SSC receives the majority of its incidents as PinICL calls raised via Powerhelp. These may be calls raised by the HIT Team for counter related problems, or the SMC for central systems or Tivoli monitored errors.
14. Problems are analysed through a process of elimination and by mimicking PM actions in an attempt to re-create the problem.
15. Primary outputs are agreed closures of PinICLs, data fixes to enable Post Masters to continue working and workarounds, usually pending final resolution through a subsequent software release by 4th line. A workaround is a temporary fix to a problem that may have an alternative final resolution.
16. The SSC are also involved in the closure of PinICLs that are referred to 4th line for resolution, where they act as moderators with the customer before agreeing final closure. PinICL closures provide the filtration measure of errors transferred to 4th line.
17. Workarounds are often required due to the backlog of software releases and unless a fix is absolutely required the PinICL is linked to a KEL entry and, with the agreement of the customer, a workaround agreed pending final resolution.
18. The Release Management Forum (RMF) controls the release of software and data through the normal release cycle although the SSC can, in an emergency, implement a change and seek retrospective approval from the RMF.
19. Closed PinICLs refer back to the originating PowerHelp call, which is automatically closed.

ICL Pathway Development (4th Line)

20. Faults are passed to 4th line when all other attempts to resolve the problem have been exhausted and it is believed that changes to the underlying code will be required to bring the problem to closure. PinICLs are routed to the Quality Filter Process (QFP) for initial scrutiny and routing to the most appropriate development team.
21. PinICLs are discussed at the Release Management Forum and a target release for the fix arrived at. Releases can be either Major or Interim and 'live fix' problems are usually targeted at the next available Interim Release if urgent, or Major Release if

not. Counter based problems are usually targeted at Major Releases due to the complexity of distributing fixes to the entire estate. Once the Release has been identified the PinICL is returned to the QFP for transfer to the appropriate development team.

22. Cleveleys office went live on Release NR2 with the next major Release, CI4, occurring during the first week in August 2000 a precise date cannot be given since Outlets are upgraded over a period of time shortly after the Release is authorised. Call E-0008021149 dated 2 August 2000 was the last recorded call under Release NR2. Call E-0008172268 dated 17 August 2000 was the first recorded call under Release CI4.

Resourcing the Support Function

23. National Rollout of the Horizon system did not complete until early to mid 2001 and would have been in full flow during 2000. As the number of Post Offices was automated so the support capability provided by ICL Pathway was enhanced to reflect the increased population of Horizon users.
24. It should also be noted that calls relating to National Rollout were handled by a dedicated Rollout Helpdesk, and not by the HSH. Rollout calls made to the HSH in error were transferred to the correct helpdesk. Cleveleys made 16 such calls.
25. The number of staff involved in staffing the horizon support system is set out below. It is to be noted that these staff were dedicated exclusively to the Post Office project.

Item	Feb 2000	Nov 2000
Number of Post Offices running Horizon System	3136	14841
Number of ICL staff in Horizon System Helpdesk Front Line (1 st Line)	65	186
Number of ICL staff in Horizon Incident Team (Additional 1 st Line) [Note 1]	0	11
Number of ICL staff in System Management Centre (2 nd Line)	50	73
Number of ICL staff in System Support Centre (3 rd Line) [Note 2]	34	34

[Note 1] : The Horizon Incident Team was introduced in July 2000 to deal with specific types of problems.

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[Note 2] : Despite the increase in Post Offices the number of employees in the SSC remained static as working practices improved, better problem diagnosis tooling was available and the general level of staff competence increased.

STATEMENT OF TRUTH

I believe the facts stated in this witness statement are true.

Signed :

Dated :