

Timeline of Post Office Ltd engagement with Imperial College London

Experts: Prof. Jeff Kramer and Dr. Naranker Dulay

[Document WITN1108101]

22 February 2024

September 2013

Initial contact by solicitors Cartwright King (Simon Clarke and Martin Smith) through ICON.

Draft version of Scope of Work drafted by Cartwright King, Simon Clarke. [ref POL00040040]

Essentially to “lay to rest the present concerns relating to the integrity of Horizon Online” following the Second Sight report.

October 2013

NDA sent to ICON and then to Company Secretary of PO for signature.

(confirmation of availability of Zuhlke software engineers for any testing of case studies that may be required)

November 2013

Signed NDA received.

Two phase approach proposed:

Phase 1 to study Horizon material and processes and produce preliminary report.

Phase 2 Detailed report on assessment of integrity, recommendations for improvement.

December 2013

Discussions between Cartwright King, PO and Fujitsu, leading to a more focussed scope of work.

January 2014

13th: Meeting at ICON with Martin Smith, Simon Clark from Cartwright King and the Post Office's Head of Criminal Law John Elsing in attendance. Fujitsu not present. (JK not present)

Naranker Dulay reported: “Fujitsu believe that an examination of the so-called ‘Horizon Core Audit process (HCAP)’ that comprises a number of elements including the central audit database, Horizon branch databases, terminals at counters, plus transactions conducted with external systems is fundamental to providing an opinion of the integrity of the Horizon Online system.”

“I think that this would be a reasonable starting point for our examination and I would be happy to focus our efforts on it in Phase 1. However, a final report based only on HCAP will probably be insufficient to provide an opinion on the whole Horizon Online system as requested in the Draft Scope.”

Phase 1 to study HCAP material and processes and produce preliminary report.

Phase 2 Detailed report including those parts of Horizon Online not covered in Phase 1.

February 2014

Contract negotiations conducted mainly through ICON.

March 2014

PO lawyers Bond Dickenson (Andrew Pheasant) request an 'initial review' into Horizon to scope the work.

Initial Review:

"Preliminary examination and review of the Horizon Core Audit Process (HCAP) and initial identification of potential issues. Brief report which scopes the objectives and work proposed for subsequent phases of the contract, as indicated (to be agreed)."

April 2014

Agreement signed between PO Ltd and IC Consultants to appoint an Expert (28/4/14). [ref POL00210444]

May 2014

Received from CK 9/5/14: draft Instructions to Expert, Second Sight (SS) interim report into alleged problems with the Horizon System, Draft Scope for Computer Experts. [ref WITN1108102]

Meeting on 16/5/14 at POL HQ with Martin Smith and Andy Holt (POL IT).

Discussed Second Sight (SS) report, Mediation Scheme, audit trails, integrity, reliability, case studies. Focus to be on technical system and procedural aspects.

Potential issues: Central vs Local integrity of data bases and reconciliation if necessary?

We produced a 'shopping list' of documentation and information requested; sent to Martin on 21/5/14. [ref WITN1108103 and POL00204789]

26th June 2014

Initial Review produced. [ref. POL00125569]

We clearly stated as follows: "Can such complex systems ever be determined to operate "without defect or error, securely, robustly and with integrity"? This is simply not possible. No complex system can be certified as bug (defect) free."

We therefore suggested as follows: "How then should an investigation into the integrity of Horizon proceed? The aim should be to provide a report on the extent to which the system is fit for purpose, supports integrity and robustness, and facilitates maintenance and upgrade. "

We continued to indicate how we intended to go about this in Phase 2, the necessary organisation and steps, and an indication of the documentation required.

8th July 2014

Quotation for Phase 2 work sent to Martin Smith. [ref. POL00325919]

19th August 2014

Roundtable meeting CK/POL/ICON at POLHK.

CK: Simon Clarke, POL: J. George, Andy Holt, Jessica Madron

“Can we argue that Horizon is fundamentally sound”

Fujitsu documents from 2004, but major update in 2010! Need documentation of current system

22nd September 2014

Signed NDA (agreeing to NDA of IC Consultants Ltd and POL [ref WITN1108104])

2/3 hours of branch counter training/systems familiarisation at POLHK.

Summary: Horizon Online appears to provide the required functionality.

Potential Issues:

- Training for subbranch managers?

- Interface – adequate but clumsy

- Mistakes vs fraud (forgetting end of transaction, merging two, ...)

- Discrepancies – little or no guidance at training or how to resolve.

15th October 2014

Fujitsu Office, Bracknell

PO: Andy Holt;

Fujitsu: James Davidson, Steve Ansell, Bill Membry, Torstein Gorstgh, Pete Newsome.

High level design/architecture, change and support processes, audit system, process and standards.

Basket of actions; completion of basket to central system; reversal if fails.

Audit requests from PO if fraud suspected.

Review of counter software; basket scenarios; reversals and recovery; SS bugs and bug handling; update scenarios; testing and maintenance; some dispute cases.

Request for more documentation (initially resisted by James Davidson of Fujitsu)

Subsequent email from Andy Holt of PO 16/10/14: “I spoke to James after the meeting so rest assured you will get any information you require for this work.”

4th November 2014

Additional clauses to the NDA from Andrew Pheasant (Bond Dickenson)

12th November 2014

Some Horizon Architecture documents sent from James Davidson to Andy Holt, received via PO via CK on 25/11/14. This is a subset of the documents finally received [ref POL00318212].

27th November 2014

Fujitsu Office, Bracknell

Fujitsu: James Davidson, Torstein Gorstgh, Pete Newsome.

Issues: Recovery flag set when not completed, even though a receipt issued?

Recovery process varies depending on service to bring system into consistency (*Area of concern with PO branch managers).

Audit trail consistency and reversals?

Recovery?

Awaiting further documentation.

James suggestion of a shared file store. (NEVER IMPLEMENTED)

2nd December 2014

Email from Andy Holt:

Apparently sent some documents to CK, including SS report and Mediation Scheme. (NEVER RECEIVED)

James Davidson apparently collating further documentation.

5th December 2014

Email from Andy Holt (PO):

Apparently "received 3 zip files from Fujitsu yesterday afternoon, I have forwarded these to Jarnail (Jarnail Singh, a criminal lawyer at POL)/Cartwright King." (THESE WERE NEVER RECEIVED) [ref. POL00325994 and POL00325994 and POL00318237]

11th December 2014

Email from Andy Holt:

"James has provided all docs so I will chase Jarnail." [ref. POL00325994]

19th January 2015

Email to Martin Smith (CK) and Kevin Lenihan (PO – replacing Andy Holt) [ref. POL00325992] [ref. POL00325994]

"We are having a problem with the transfer of documentation to us. This is causing a severe delay in progress and making it difficult to perform the work.

We are still waiting for the documents which were apparently sent from Fujitsu and forwarded to Cartwright King in early December!

We have also not received the Second Sight/Mediation documents mentioned by Andy Holt.

At the last meeting at Fujitsu with James Davidson of Fujitsu in November, it was agreed that they would try and set up some form of file sharing arrangement so that access to documentation would be more convenient than a transfer via so many intermediaries.

Please can you chase this up as a matter of some urgency."

27th February 2015

Email from Martin Smith (CK):

"I have made a number of recommendations to Post Office. A draft protocol has been provided which deals with the requests for and provision of information, thereby providing a suitable framework and the requisite visibility.

I am currently awaiting further instruction and will revert to you just as soon as I am able."

19th May 2015

Email from Susanne Westfold-Scott of Imperial Consultants:

"A note to update you on the progress (or lack of it) on your and Naranker's services for Cartright King and the PO. We submitted the invoice for your services on Phase 2 on 6th May, which I chased today (emails below). Martin Smith rang me today to explain that there has been some delay caused by the replacement of the General Counsel. The new (and third) General Counsel has just been appointed to the case and now wants to get the preparation of the case back on track. There have also been some problems due to officers at the PO instructing you and Naranker direct but these instructions have been invisible to both legal departments at the PO and Cartwright King. Martin mentioned that they had wanted to set up a Data Vault so that all parties knew what information was being shared but as it stands this vault was not set up and neither legal office at the PO and Cartwright King has any idea what material or instructions you have been given. Thus when we submitted our invoice to Martin it came as somewhat of a surprise to him as he was not aware it was part of the work for Phase 2 of the Services."

"What the new General Counsel now wants to do is have a round table meeting with you and Naranker to discuss the material that has already been passed to you along with your and Naranker's findings to date and work completed on this data (which was set out in the invoice). From this meeting they hope to draft a protocol for your Services to be undertaken. I also reminded Martin that at present we have no fully signed NDA (I have returned two copies signed by ICON but have never received a counter-signed agreement) nor a signed agreement for Phase 2 of your Services. Thus there is no protection of Confidentiality or terms for these Phase 2 Services, including payment. "

10th June 2015

Email from Susanne Westfold-Scott of Imperial Consultants:

"Martin Smith from Cartright King has just rung as he has just had a call from the PO.

First of all Martin wanted to know if the PO had paid our last invoice – I have checked and they have not.

1. What the PO now want is to meet with you and Naranker as soon as possible – so could you provide some dates please.
2. The PO also want an inventory of what information has been passed to you and Naranker by the PO and Fujitsu. ...
3. And finally, if there are any other issues you would like to raise at the meeting? My only comment here, which Martin and I discussed, is that the NDA has still not been signed by the PO. We have sent a couple of copies signed on your /ICON's behalf so really for the problem of confidentiality and completion of this agreement rests with the PO."

8th July 2015

As requested by the PO (via Martin Smith):

List of documents provided to Professor Kramer and Dr Dulay: Existing Architecture and Process Documents of Horizon System [ref POL00318212 and POL00318212].

29th July 2015

Meeting at POLHK:

CK: Martin Smith, Simon Clarke, Harry Bay(?)

PO: Lawyers: Roderic Williams, John Scott, Jessica Madron (chair), POLIT Kevin Lenihan.

Summarised state of the work and the need for convenient access to documentation ("vault").

Decision to continue with Phase 2 with Kevin Lenihan as POL contact, Torstein or Pete Newson as Fujitsu contact.

17th August 2015

BBC Panorama programme "Trouble at the Post Office"

19th August 2015

Email from Martin Smith that he agreed that the meeting was constructive and understood that POL were currently considering a number of the issues raised.

22nd September 2015

Reminder email from ICON to Martin Smith.

NO FURTHER COMMUNICATION OR INTERACTION!