



**HORIZON ISSUES TRIAL WITNESS EVIDENCE PLAN**

Witness/Areas to Cover Issue (what we are responding to)	Current status
<p>Angela van den Bogerd</p> <ul style="list-style-type: none"> <li>• the Subpostmaster Evidence (Burke,Tank etc.);</li> <li>• response to Ian Henderson (paras. 2.4 [<b>note: we have requested the sample XML data from Freeths as it doesn't appear to be in Relativity</b>], 2.5, 2.8 - 2.10, 2.11 - 2.13 of Coyne)</li> <li>• the Claimants' evidence in relation to the Common Issues trial as it pertains to Horizon (5.27 and 5.113 of Coyne);</li> <li>• Subpostmaster feedback - reluctance to report shortages to NBSC (7.42 of Coyne);</li> <li>• failed reversals (5.47 - 5.50 of Coyne and the Helen Rose Report);</li> <li>• <del>POLSAP Outage 25 &amp; 26 Jan 2016 (Charteris request relating to POL-0216412).</del> [<b>Note: Charteris requested the 9 May outage to be covered - can do that when responding to Burke</b>];</li> <li>• Horizon User Group?</li> </ul>	
<p>Steve Parker [TBC]</p> <ul style="list-style-type: none"> <li>• response to R Roll; and</li> <li>• the three known bugs and Dalmellington (5.16 - 5.19 of Coyne and also para. 36 of Henderson re system logs not being available in branch).</li> </ul>	
<p>Torstein Godeseth 2</p> <ul style="list-style-type: none"> <li>• response to Charles McLachlan; and</li> <li>• an explanation of the three known bugs and Dalmellington.</li> </ul>	
<p>Catherine Hamilton (all references are to paras. of Coyne's report)</p> <ul style="list-style-type: none"> <li>• reference data (4.19 - 4.21);</li> <li>• McKinsey findings re small changes to Horizon avoiding errors/mistakes in branch (5.125);</li> <li>• limits on the number of non-chargeable data queries (5.128);</li> <li>• Post Office incident summary document highlighting a number of high severity incidents between May and June 2015 (5.146);</li> <li>• independent technical review in 2010 re recoverability following interruptions in service (5.147);</li> <li>• dealing with bugs on a cost/benefit basis (5.161, 5.162 5.164, 6.3-6.4 and 4.96); and</li> </ul>	

<ul style="list-style-type: none"> <li>poorly handled changes by Post Office e.g. Moneygram (5.183).</li> </ul>	
<p>Paul Smith</p> <ul style="list-style-type: none"> <li>anecdotal evidence of: (1) the volume of TCs that are disputed (para 65/comment AdGR58 of "Updated Summary of Opinions" document (<b>Summary of Opinions</b>) and referred to in "Response to Comments on Summary of Opinions" document (<b>Opinions Response</b>)); and (2) the dispute success rate (Charteris request); and</li> <li>the use of Credence by Post Office when investigating discrepancies (5.176, 5.180 and 6.66 of Coyne).</li> </ul>	
<p>Dave Johnson 2</p> <ul style="list-style-type: none"> <li>the fast cash button (response to McLachlan para. 19);</li> <li>data that was not available on the day of a transaction (response to Henderson para. 2.15 (a)/Second Sight's Briefing Report Part Two); and</li> <li>does SD/DES/005 show all reports and receipts produced by the counter (8.12 of Coyne)?</li> </ul>	
<p>Alison Bolsover</p> <ul style="list-style-type: none"> <li>disputing discrepancies before 2005 (7.28 of Coyne); and</li> <li>communications to branches regarding the three known bugs (7.1 and 7.3 of Coyne and Charteris request relating to DOC 38239623(1)).</li> </ul>	
<p><b>Areas of evidence not currently assigned to a witness as at 30 Oct – POL</b></p>	
<p>Evidence to allow Robert to precisely calculate the impact of "limited tenure", "variable number of branches" and "variable size of branches" on the correction factor (paras 5-6 of "Alternative Formulation of the Main Analysis" document (<b>Alternative Formulation</b>))</p>	
<p>Evidence as to the call volumes received by the help desk reporting large anomalies (para 12(i) of Alternative Formulation) <b>[This is identified as a key area for evidence by Dr Worden]</b></p>	
<p>Evidence about the total number of calls made to the help desk by the SPMR representative body in relation to large financial anomalies (para 12(ii) of Alternative Formulation and para 3(c) of Request for Additional Evidence dated 22 October 2018 (<b>Evidence Request</b>))</p> <p>Evidence as to the approximate number of calls to the help desk per day and the proportion of those calls associated with</p>	

anomalies in branch accounts (para 2 of Evidence Request)	
Evidence as to the proportion of calls to the help desk about branch account anomalies that were resolved to the detriment of the SPMR (para 12(vi) of Alternative Formulation and para 3(d) of Evidence Request)	
Evidence in KELs, PEAKs or other reports of anomalies in branch accounts (para 12(iii) of Alternative Formulation)	
Evidence as to the quality of the process by which KELs were analysed and resolved and the extent of any reoccurrence of supposedly resolved issues (para 12(iv) of Alternative Formulation)	
Evidence as to the number of anomalies in branch accounts which were identified as being caused by errors in-branch and therefore were attributed to the branch (para 12(v) of Alternative Formulation)	
POL/Fujitsu's awareness of the 9 KELs/bugs (out of the 62 KELs referred to by Coyne) which Dr Worden believes could have the potential to cause errors in branch accounts (comment AdGR4 in "Analysis of KELs in the Coyne Report" document ( <b>Analysis of KELs</b> ))	
Evidence as to the extent to which SPMRs report all significant anomalies that affect their accounts (comment SH9 in Analysis of KELs)	
Evidence as to the extent that " <i>testing good practice (TGP)</i> " (eg regression testing, user testing, testing edge cases) was used as a countermeasure in relation to Horizon (comment AdGR14 in Analysis of KELs)	
Evidence as to the extent that " <i>bug finding and correction (BFC)</i> " was used as a countermeasure in relation to Horizon (comment AdGR15 in Analysis of KELs)	
Evidence as to the extent that " <i>large-scale IT architecture (ARC)</i> " (eg using a distributed network of sub-systems) was used as a countermeasure in relation to Horizon (comment AdGR17 in Analysis of KELs)	
Evidence as to the extent that " <i>managing non-functional requirements (NFR)</i> " (eg manageability, supportability, maintainability, adaptability) was used as a countermeasure in relation to Horizon (comment AdGR18 in Analysis of KELs)	
Evidence as to the extent to which all of the effects of the bug addressed by KEL wrightm33145J were identified and corrected (comment AdGR21 in Analysis of KELs)	
Evidence to demonstrate/quantify the impact of the bug addressed by KEL LKiang3014S and as to the extent to which all of the effects of that bug were identified and corrected (comment AdGR23 in Analysis of KELs)	

Evidence as to the extent to which all of the effects of the bug addressed by KEL wbra5353J were identified and corrected (comment AdGR24 in Analysis of KELs)	
Evidence to demonstrate/quantify the impact of the bug addressed by KEL ballantj1759Q and as to the extent to which all of the effects of that bug were identified and corrected (comment AdGR30 in Analysis of KELs)	
Evidence to demonstrate/quantify the impact of the bug addressed by KEL acha1357Q and as to the extent to which all of the effects of that bug were identified and corrected (comment AdGR31 in Analysis of KELs)	
Evidence to demonstrate/quantify the impact of the bug addressed by KEL acha3145Q and as to the extent to which all of the effects of that bug were identified and corrected (comment AdGR32 in Analysis of KELs)	
Evidence to demonstrate/quantify the impact of the bug addressed by KEL pothapragadac4359R and as to the extent to which all of the effects of that bug were identified and corrected (comments AdGR33 and AdGR56 in Analysis of KELs)	
Evidence as to SPMRs' behaviour in reporting anomalies. Specifically, are most anomalies reported when they exceed a certain financial value (eg £300)? Do some SPMRs still report even small anomalies? (para 2 of "Financial Impact of All Bugs" document ( <b>Financial Impact</b> ), paras 32-33 of Summary of Opinions and referred to in Opinions Response)	
Evidence as to the likelihood of a bug affecting branch accounts not resulting in a KEL and a PEAK (para 2(ii) of Financial Impact) and to support the conclusion that any bug with a potential impact on branch accounts is highly likely to be reported and investigated (and with high priority) on most occasions when it occurs (paras 32, 33 and 35 of Summary of Opinions and referred to in Opinions Response)	
Further evidence to demonstrate that, where an anomaly is immediately visible to a SPMR as part of daily trading, the issue is reported on at least some occasions even if the financial impact is small (para 13(i) of Financial Impact)	
Further evidence to demonstrate that, where an anomaly is only visible to a SPMR upon monthly balancing/rollover, the threshold financial impact value for reporting is likely to be higher, but that anomalies over £100 are likely to be reported on at least some occasions (para 13(ii) of Financial Impact)	
Evidence to support the conclusion that the process for creating and maintaining KELs is fairly efficient and effective (paras 17-18 of Financial Impact and para 35/comments AdGR34 and AdGR36 of Summary of Opinions) including evidence as to the quality of the drafting of KELs, their comprehensiveness and evidence that fixes identified were actually implemented (comment AdGR36 of Summary of Opinions)	
Evidence about the creation of KELs – does the potential financial impact of an issue make fixing it a higher priority? (para 18 of Financial Impact and comment R44 in Response to Financial Impact)	

Evidence to support the conclusion that for 42 out of the 50 KELs preliminarily examined by Dr Worden, they disclose no bug in Horizon or there is no possible effect on branch accounts (para 24(i) of Financial Impact)	
Evidence as to the financial impact of the three known bugs (para 28 of Financial Impact) [ <b>Note - covered by Torstein 2 and Alison Bolsover</b> ]	
Evidence as to the policy and extent of deleting KELs (paras 22-37 of Financial Impact) [ <b>Note: the policy is in a document that has been disclosed</b> ]	
Evidence to demonstrate that none of the claimants' branches were affected by the three known bugs (para 25 of Summary of Opinions)	
Evidence to demonstrate that, in relation to the three known bugs, all affected branches were identified, all false figures were identified and all affected SPMRs were compensated (paras 29-31/comment AdGR20 of Summary of Opinions) [ <b>Note - covered by Torstein 2 and Alison Bolsover</b> ]	
Evidence to demonstrate that there have never been any undetected bugs affecting branch accounts (comment AdGR43 of Summary of Opinions) [ <b>Note: I don't think this is possible</b> ]	
Evidence to demonstrate that all of the bugs identified was recorded as KELs and their full financial impact was recorded in the KELs (comment AdGR43 of Summary of Opinions) [ <b>Note: I don't think this is possible - KELs subjective/only as good as their author makes them</b> ]	
Evidence as to whether whenever a mismatch is discovered, the contract between POL and the client organisation defines how it is to be investigated and handled (para 62(iv) of Summary of Opinions) [ <b>Note: I thought we had dropped this?</b> ]	
Evidence to oppose Coyne's conclusion (if it is opposed) that the "human element" of the reconciliation process adds another level of unreliability to Horizon (para 65/comment AdGR58 of Summary of Opinions) [ <b>Note: it does doesn't it?</b> ]	
Evidence as to the proportion of TCs that are contested by SPMRs, for what reasons, how they are investigated and what proportion of contested TCs are resolved in favour of the SPMR (para 66/comment SH59 of Summary of Opinions and referred to in Opinions Response) [ <b>Note: covered by Paul Smith</b> ]	
Evidence as to the "tightly controlled conditions" by which POL/Fujitsu were able to access transaction data recorded by Horizon remotely (para 82/comments SH62 and AdGR63 of Summary of Opinions and referred to in Opinions Response)	
Evidence as to the number of branches in existence each year between 2000-2018 (para 1(a) of Evidence Request)	
Evidence as to the proportion of claimants who did not manage a branch (para 31/comment AdGR 23 of Summary of Opinions and	

referred to in Opinions Response)	
Evidence as to the proportion of total branches managed by claimants (ie is it 561 branches out of 11,000 total?) (paras 38 and 43/comments AdGR42 and AdGR44 of Summary of Opinions and referred to in Opinions Response)	
Evidence as to how the claimants' branches compare to other branches in terms of transaction volumes (the impression is that claimant tend to have smaller than average branches) (para 1(b) of Evidence Request)	
In general, evidence that can be used to disprove the possible contention that claimants' branches were more likely to be affected by Horizon bugs than other branches (ie are there any special characteristics of the claimants' branches? Are they generally smaller?) (para 4 of Alternative Formulation and referred to in Response to Alternative Formulation)	
Evidence as to the number of SPMRs who have been members of the JFSA (para 3(a) of Evidence Request) <b>[Note: should this be the Fed?]</b>	
Evidence as to the proportion of claimants who are members of the JFSA (para 3(b) of Evidence Request) <b>[Note: as above]</b>	
POL to provide all relevant information on Dalmellington issue (paras 5.16-5.19 and 7.17 of Coyne Report) <b>[Note: covered by Torstein 2]</b>	
Evidence as to whether SPMRs were notified of the known receipts and payments mismatch bug (para 7.13 of Coyne Report) <b>[Note: Alison Bolsover]</b>	
Evidence as to whether SPMRs were notified of the known Callendar Square bug (para 7.14 of Coyne Report) <b>[Note: Alison Bolsover]</b>	
Evidence as to whether any branches were actually affected by the Callendar Square bug (paras 29 and 31/comments AdGR20 and SH25 in Summary of Opinions and referred to in Opinions Response) <b>[Dr Worden identifies this as a key/urgent area for additional evidence]</b>	
Evidence as to whether SPMRs were notified of the issue highlighted by KEL wrightm33145j (paras 5.10 and 7.41 of Coyne Report)	
Evidence as to how SPMRs were notified of the Suspense Account bug (para 3.6 of Coyne Report) <b>[Note: Alison Bolsover]</b>	
"Documented audit log of each and every occasion of live data access" (paras 3.23 and 9.72 of Coyne Report) <b>[Note: MSC's disclosed/to be disclosed]</b>	

Evidence as to how often transaction data was accessed (paras 3.24 and 9.73 of Coyne Report)	
Response to Angela Burke's witness statement regarding a recovery process failure (para 5.40 of Coyne Report) [Note: AvdB]	
Response to Akash Patny's witness statement regarding Moneygram imbalances (para 5.185 of Coyne Report) [Note: AvdB]	
Evidence as to whether (and if so, which) branches might have been affected by the "missing data" referred to in para 6.46 of Coyne Report.	
Response to reference to specific example of POL " <i>creating incorrect Transaction Corrections and sending these to Subpostmasters</i> " (TC issued for 800 sheets of 100 stamps instead of 8 sheets of 100 stamps) (para 6.64 of Coyne Report)	
Response to Angela Burke's witness statement regarding TCs being documented against the incorrect financial institution (para 6.65 of Coyne Report) [Note: AvdB]	
Response to section of Coyne Report regarding the number of TC queries raised by SPMRs to the help desk (para 6.68 of Coyne Report)	
Response to Adrees Latif's witness statement regarding a failed TC relating to Camelot scratch cards (para 6.69 of Coyne Report) [Note: AvdB]	
Explanation of use of "Discrepancy" activity type noted on SLA Summary document (para 6.71 of Coyne Report)	
Comment on Coyne's statement that " <i>the ability to have a debt suspended pending an investigation has only been available since August 2005</i> " (para 7.31 of Coyne Report) [Note: A Bolsover]	
Evidence in relation to the different mechanisms available to SPMRs to dispute discrepancies prior to 2016 (para 7.36-7.37 of Coyne Report) [Note: A Bolsover]	
Comment on Coyne's interpretation of the 2011 EY report regarding the " <i>weak user account management controls</i> " and concerns about the granting and monitoring of user access (para 9.67 of Coyne Report) [Note: Catherine Hamilton]	
Evidence as to call volumes received by the help desk over time (eg do call volumes increase significantly after a big release?) (para 6/comment SH2 of Summary of Opinions and referred to in Opinions Response)	
<b>Areas of evidence not currently assigned to a witness – Fujitsu</b>	
Comments from Fujitsu on Dr Worden's conclusion that the KELs " <i>strongly confirm</i> " that Horizon is a robust system, because the	

KELs illustrate the use of countermeasures to achieve robustness (para 5/comment AdGR13 in Analysis of KELs)	
Comments from Fujitsu on the specific KELs referred to in Coyne's report (comment AdGR2 in Analysis of KELs)	
POL/Fujitsu's awareness of the 9 KELs/bugs (out of the 62 KELs referred to by Coyne) which Dr Worden believes could have the potential to cause errors in branch accounts (comment AdGR4 in Analysis of KELs, para 25/comment AdGR18 of Summary of Opinions and referred to in Opinions Response) <b>[Dr Worden identifies this as a key area of additional evidence from Fujitsu]</b>	
Evidence as to Fujitsu's processes for investigating anomalies reported by SPMRs or others, to diagnose their causes, to provide support to SPMRs and to fix any bugs revealed (para 34 of Summary of Opinions)	
Evidence as to the " <i>tightly controlled conditions</i> " by which POL/Fujitsu were able to access transaction data recorded by Horizon remotely (para 82/comments SH62 and AdGR63 of Summary of Opinions)	
Evidence in response to Coyne's comment that a number of external audit reports mention that Fujitsu could remotely access transaction data " <i>without adherence to the control mechanisms in place</i> " (paras 3.16 and 9.70 of Coyne Report)  Evidence in response to Coyne's comment that a number of external audit reports mention that " <i>the appropriate control mechanisms to prevent mistakes being made were not always followed</i> " in relation to Fujitsu's staff's remote access capabilities (paras 3.21 and 9.71 of Coyne Report)	
Fujitsu to review Coyne's chronology of Horizon milestones (para 4.1 of Coyne Report) <b>[Note: Catherine Hamilton]</b>	
Fujitsu to review Coyne's references to poor control of reference data (paras 4.21, 5.30 and 5.103 of Coyne Report) <b>[Note: Catherine Hamilton]</b>	
Fujitsu to respond by reference to disclosed documents to Coyne's section on payments mismatch (were all instances fixed, how many corrections were needed to achieve this and when was a full audit completed) (para 5.11 of Coyne Report)	
Fujitsu to provide all relevant information on Dalmellington issue (paras 5.16-5.19 and 7.17 of Coyne Report)	
Fujitsu to provide the June 2006 Anne Chambers "APS Recovery V2" document referenced by KEL jharr832S (para 5.41 of Coyne Report)	
Fujitsu to provide analysis of impact and information on the fix in relation to the issue identified in KEL PSteed2847N (para 5.51 of Coyne Report)	
In relation to KEL cardc5756N, Fujitsu to confirm whether there were any other cases, whether the KEL is still unresolved (and if	



so, why) (para 5.52 of Coyne Report)	
Fujitsu to comment on the unresolved issues referred to in paras 5.54-5.59, 5.119-5.121, 5.130-5.131, 5.137, 5.139-5.141, 5.145-5.152 and 5.186 of Coyne Report	
Fujitsu to provide KEL DRowe1625K (mentioned in PEAK PC0084116) (para 5.57 of Coyne Report)	
Fujitsu to provide fuller evidence of "downtime" across the Horizon system (para 5.108 of Coyne Report)	
Fujitsu to confirm impact of POLSAP outage in January 2016 (paras 5.144-5.145 of Coyne Report) <b>[Note: Charteris ok with explanation of this]</b>	
Fujitsu to provide data on KPIs referred to in Post Office Account Customer Service Problem Management Procedure document (para 5.156 of Coyne Report)	
Fujitsu to analyse sections 6 and 8 of Coyne Report ("Reconciliation and Transaction Corrections" and "Horizon Shortfalls, Data and Reporting for Subpostmasters and Post Office")	
Fujitsu to comments in section 9 of Coyne Report in relation to its remote access/transaction data alteration capabilities	
Fujitsu to comment on/provide other versions of the "closed problem records" spreadsheet (paras 5.75-5.76 of Coyne Report)	
Confirm if and when a fix was implemented in relation to the issue with reports available to SPMRs reporting erroneous data because of changes made to stock units (para 8.21 of Coyne Report)	
Response to Richard Roll's witness statement regarding Fujitsu employees' remote access capabilities (para 9.10 of Coyne Report) <b>[Note: S Parker]</b>	
Response to Richard Roll's witness statement regarding the common practice of Fujitsu employees re-creating branch databases in order to try to fix corruptions (paras 9.22 and 9.44 of Coyne Report) <b>[Note: S Parker]</b>	
Explanation of the "global branch" WAK01 Branch Code 999993 (para 9.17 of Coyne Report) <b>[Note - Torstein]</b>	
Comment on Coyne's observation in relation to applying corrective fixes, that Fujitsu would <i>"utilise the branch accounting code of the branch for which the correction transaction was required"</i> (para 9.25 of Coyne Report)	
Comment on Coyne's observations regarding the approval of OCRs (para 9.61 of Coyne Report)	

Evidence that Fujitsu followed good " <i>mature IT project practice for managing risks and issues</i> " in order to demonstrate that the effects of issues in the system are managed acceptably (para 10/comment AdGR4 of Summary of Opinions and referred to in Opinions Response)	
Evidence as to the full extent of the impact of the receipts and payments mismatch bug (para 31/comment SH21 of Summary of Opinions and referred to in Opinions Response)	