

Wednesday, 16 November 2022

(10.00 am)

SIR WYN WILLIAMS: Mr Beer, before we get going with the evidence, I have a number of announcements that I would like to make. I've got a carefully prepared script so that I don't get it wrong. So let me read it out.

During the course of his oral submissions at the commencement of this phase of the Inquiry, Mr Stein asked me to consider permitting recognised legal representatives to make what he described as "short oral submissions", after the evidence had been heard at the close of each phase of the Inquiry. Having given the request some thought, as this phase of the Inquiry has been in progress, I have decided that, if any recognised legal representative wishes to make short oral submissions about the evidence heard in Phase 2, they may do so on Friday 2 December. Each legal representative who wishes to speak will be limited in time to 45 minutes.

As an alternative, recognised legal representatives may prefer to make written submissions about the evidence heard in Phase 2. If any legal representative opts to make written submissions, those submissions should be no greater than 25 pages in length and should be filed with the Inquiry by 12 noon on

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impose too great a strain upon those involved in this arduous process.

Next, it is now possible to make a reasonable prediction as to the likely timing of Phases 4, 5, 6 and 7. My current intention is that oral evidence will be taken in relation to Phases 4 and 5 in the period between 2 May 2023 and 31 July 2023. Oral evidence in relation to Phase 6 will commence in September 2023, and it is anticipated that oral evidence in relation to Phases 6 and 7 will be completed before the end of 2023.

For the avoidance of any doubt, there will be no hearings in August 2023, and I will endeavour to be as flexible as is reasonably possible in relation to the fixing of dates for hearings in September 2023.

I hope it will now be obvious to everyone that the volume of documentation of relevance to the Inquiry is such that there is a need for breaks between the various phases, and the need for a reasonably substantial break between the end of Phase 3 and the beginning of Phase 4 is, I hope, self-evident.

I would like to confirm my intention to hold a hearing on 8 December 2022 so that I can be updated on the various compensation issues which are still under consideration, and thereafter give consideration to making an interim report to the minister to be laid

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Wednesday, 7 December.

I stress that this decision should not be taken as setting any kind of precedent for what I might permit in relation to the remaining phases of the Inquiry.

Second announcement: I am now in a position to provide further details as to the hearings relating to Phase 3 of the Inquiry. These hearings will take place between 10 January 2023 and 20 January 2023 and between 14 February 2023 and 10 March. All these hearings will be held here at the IDRC, and the sittings will take place Tuesday to Friday in each of those weeks.

I have decided that there is no need to begin the Phase 3 hearings in the week commencing Monday 12 December, as I had previously announced. By delaying the start of Phase 3 until January next year, there will be additional time for appropriate disclosure to the Inquiry pursuant to Rule 9 requests and further time for the Inquiry team to provide disclosure of relevant documents to the recognised legal representatives or Core Participants.

The break in the sittings between 20 January and 14 February has been caused by the need to secure suitable accommodation for the hearings, but the fact of the break will also allow for disclosure of documents to and by the Inquiry to proceed in a way which does not

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before Parliament pursuant to the Inquiries act 2005.

Finally, I should say that I am monitoring the issue of disclosure of documents, as I promised I would, and I will not hesitate to convene a hearing before or after Christmas if I consider that there are issues related to disclosure which would benefit from oral submissions.

So thank you all very much and over to you, Mr Beer.

MR BEER: Thank you, sir. May I call David McDonnell, please.

DAVID McDONNELL (affirmed)

Questioned by MR BEER

MR BEER: Thank you, Mr McDonnell. As you know, my name is Jason Beer and I ask questions on behalf of the Inquiry. Can you tell us your full name, please.

A. David McDonnell.

Q. May I thank you on behalf of the Inquiry for providing a witness statement and coming to the Inquiry today to give evidence to assist us with our investigation. We thank you.

You should have in front of you a hard copy of your witness statement which, excluding the exhibits to it and the index to the exhibits to it, is 18 pages in length, and it should be dated 3 November 2022.

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1 A. Correct.

2 Q. Is that your signature on page 18?

3 A. Yes, it is.

4 Q. For the transcript, that's WITN00620100 at page 18. Can

5 I just invite you please to turn to page 15 and

6 paragraph 47. Two lines from the end, a name is given.

7 It says:

8 "By a staffer from Bracknell called Nick Lawson."

9 Do you wish to make a correction to the surname of

10 that individual?

11 A. Correct.

12 Q. What's the correct surname?

13 A. It should read Nick Lawman.

14 Q. L-A-W-M-A-N?

15 A. Correct.

16 Q. Similarly, in paragraph 55 on page 17 four lines in it

17 reads:

18 "From Bracknell, Nick Lawson."

19 Same correction?

20 A. Correct.

21 Q. With those two corrections, are the contents of the

22 statement true to the best of your knowledge and belief?

23 A. Yes, they are.

24 Q. A copy of that statement will be uploaded to the

25 Inquiry's website. So I'm not going to ask you about

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1 Q. As you have just said, you were in a team working on the

2 EPOSS counter component of the Horizon System; is that

3 right?

4 A. Correct.

5 Q. In terms of the structure of the team, was Steve Warwick

6 the project manager?

7 A. Yes, he was.

8 Q. Was he a full-time ICL employee or was he a contractor?

9 A. He was a contractor.

10 Q. Do you know to whom he reported?

11 A. He reported to Terry Austin, but actually in reality

12 quite a lot of people in the building. He had a very

13 extensive knowledge of how the Post Office worked and

14 tended to talk to quite a lot of people. But he

15 reported directly to Terry Austin.

16 Q. Just expand on that, that he had quite a good knowledge

17 of other people within the building.

18 A. Yes, his network was quite formidable really. He knew

19 pretty much everybody in the building and had a lot of

20 knowledge of the history of the project and, to be

21 honest, what he didn't know about how the Post Office

22 worked, you know, didn't exist. He was very

23 knowledgeable about how the systems worked.

24 Q. In terms of Terry Austin, he was the program manager; is

25 that correct?

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1 every aspect of it; do you understand?

2 A. Yes.

3 Q. Can you tell us something about your background at

4 qualifications, please. So to start with your

5 qualifications.

6 A. I achieved a Bachelor of Science honours degree in

7 Computer Science from Sheffield Polytechnic, graduating

8 in 1987. During that period, I spent a year-and-a-half

9 on a sandwich placement at ICL Bracknell and,

10 subsequently, after graduating a further year-and-a-half

11 or so again back at ICL Bracknell working on their

12 software development system.

13 Q. So I think you joined ICL Pathway in Easter '98; would

14 that be right?

15 A. Yes.

16 Q. You worked at ICL Pathway for a couple of years; is that

17 right?

18 A. Yes.

19 Q. What was your job title when you initially started?

20 A. I was brought in by Chris Humphries and placed into the

21 EPOSS counter development team as the deputy to Steve

22 Warwick, deputy development manager.

23 Q. So deputy development manager. If you had a business

24 card, that's what it would say on it?

25 A. Yes.

6

1 A. Yes.

2 Q. That was his formal report?

3 A. Yes.

4 Q. Chris Humphries, what was his position on the team,

5 please?

6 A. Chris Humphries was -- I'm not sure exactly what formal

7 title would be, but he was under Terry Austin, and he

8 managed projects such the EPOSS counter in more of

9 a deputy program manager or departmental management

10 role. He didn't get involved technically day to day,

11 but he managed the kind of programmers as deputy program

12 manager, I would say, under Terry.

13 Q. There were, I think you say in your statement, eight or

14 so developers on this team; is that right?

15 A. Yes.

16 Q. Was there a hierarchy amongst the developers?

17 A. Not really. It was quite a flat eight, I would say.

18 There was various degrees of experience and capability

19 in the team, but there was no formal structure as such.

20 It was flat under Steve Warwick when I arrived.

21 Q. You tell us something in your statement about Chris

22 Humphries expressing deep concerns over the quality of

23 the EPOS team and of the code being produced at

24 interview.

25 A. Yes, it came out as early as that during my interview

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1 with him. He didn't go into specifics or names. He did
 2 allude to quite a few concerns and the reason why I was
 3 being brought in.
 4 **Q.** What was the reason for you being brought in?
 5 **A.** He needed to bolster the team with some experienced,
 6 technical, formally qualified ability, was my
 7 understanding.
 8 **Q.** You said -- I'm sorry --
 9 **A.** Sorry, go on.
 10 I think he suspected that Steve Warwick, as
 11 knowledgeable as he was about the Post Office, wasn't
 12 technically or formally qualified, and that is probably
 13 what led to his concerns about why he needed to bring
 14 somebody with a little bit more formal experience in to
 15 the team.
 16 **Q.** What was your understanding of what Steve Warwick was
 17 qualified in?
 18 **A.** At interview, I didn't hear anything as such, but very
 19 soon after arriving it was very clear that Steve's
 20 immense knowledge of the Post Office tended to override
 21 anybody's opinion or anybody's views, because he could
 22 very easily engineer a discussion, with such wealth of
 23 knowledge on the subject, at a business level, that it
 24 was very difficult to argue or contribute to such
 25 a conversation on a technical level. So almost

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1 on the EPOS team?
 2 **A.** When I initially started, it was to run the team
 3 technically on a day-to-day basis, the development team.
 4 **Q.** By run, can you explain what it meant, what you mean by
 5 that. Do you mean as a manager, HR professional or --
 6 **A.** No, pretty much, within a matter of a few days, Steve
 7 Warwick was so busy working on future requirements or
 8 business liaison, whatever it was he was doing on a kind
 9 of business-process level, I very quickly took over the
 10 day to day management of the developers, the code
 11 deliveries, the PinICL management, the change release
 12 management software, things like that. So I worked with
 13 the developers on software developer, PinICL resolution
 14 and trying to -- well, very quickly got into the stride
 15 of things we needed to improve.
 16 **Q.** You told us that in the interview Mr Humphries expressed
 17 deep concerns over the quality of the EPOS team and the
 18 code being produced. What concerns did Mr Humphries
 19 raise in respect of the quality of the EPOS team?
 20 **A.** Chris already had a feeling that some of the guys
 21 weren't up to it. They weren't sufficiently experienced
 22 or capable or had the ability to kind of take on the
 23 work that was required to get this thing built and over
 24 the line. He didn't mention any names specifically at
 25 the interview, but he had a pretty good handle on the

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1 everybody deferred to him in terms of his knowledge of
 2 the business processes of how the Post Office worked.
 3 **Q.** Was Jan Holmes a member of the team?
 4 **A.** No.
 5 **Q.** What, to your understanding, at this time on recruitment
 6 in Easter '98 was Jan Holmes' role?
 7 **A.** I don't think -- although I new Jan personally from
 8 being in the building, Jan didn't have an involvement
 9 directly in the development team until the task-force
 10 really. I know that he was doing work around the
 11 project and in his audit capacity, but not specifically
 12 day to day in the EPOS team at that time.
 13 **Q.** You say in your statement that there was one technical
 14 assistant, Brian Orzell. What do you mean by technical
 15 assistant?
 16 **A.** Brian's role was to take care of -- he was kind of the
 17 NT expert on the team who took care of administrative
 18 privileges and user roles and all of the kind of NT
 19 stuff and not -- he wasn't a developer. He did assist
 20 in facilitating extractions of message stores or any
 21 technical questions that people had or any of the
 22 PinICLs that came through which were more NT orientated,
 23 such as blue screens, things like that, Brian would get
 24 involved in diagnosing those.
 25 **Q.** Thank you. What were your duties and responsibilities

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1 fact that things weren't right in the counter team.
 2 **Q.** You say in your statement that within days of starting
 3 it became very obvious to you that several members of
 4 the development team were not capable of producing
 5 professional code.
 6 **A.** Yes.
 7 **Q.** How many members of the team of eight?
 8 **A.** Out of the eight, I would say two were pretty good, very
 9 capable; another two were kind of mediocre but we could
 10 work with them, they could contribute positively; and
 11 there was probably three or four who just weren't up to
 12 it.
 13 **Q.** You used the phrase "not capable of producing
 14 professional code". Does that accurately describe the
 15 level of your concern?
 16 **A.** Yes.
 17 **Q.** You say that in interview Mr Humphries raised deep
 18 concerns in respect of the quality of the code that was
 19 being produced. Can you remember anything more than
 20 that?
 21 **A.** His take on it then was not at a level where he would
 22 have inspected the code or read any of the code *per se*.
 23 He was responding to basically the lack of quality which
 24 was being signalled from the test team with the number
 25 of PinICLs being raised.

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1 Q. You say that within days of you starting it became
2 obvious to you that there were no development standards
3 or methodology. What do you mean by that, development
4 standards or methodology?

5 A. Well, a project such as that -- well, any kind of
6 software development project, there should be
7 a framework of how the team work. It should start with
8 the design documents. That's the target of what you are
9 trying to deliver; that's what you are building against.
10 They weren't in evidence. I know that there had been
11 some documents that were reverse engineered, but they
12 were irrelevant and out of date, and they weren't even
13 in the building when I got there. I had to ask for
14 them.

15 Methodology-wise, back then it was mostly kind of
16 a PRINCE2 kind of.

17 Q. Just explain in a couple of sentences to those that
18 might be listening with PRINCE or PRINCE2 methodology,
19 what that is.

20 A. It's basically just a set of rules that you follow, that
21 you must have a certain structure of documentation
22 provided. When you write code against them you should
23 follow a certain sequence of steps, such as code reviews
24 or coding standards, and there should be a coding
25 standards document which specifically states how to go

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1 written, why you've written it in a certain way, and
2 just basically explain it to them, read it through with
3 them, and, if everybody's in agreement that is a correct
4 interpretation of the design, it adheres to the coding
5 standards that's agreed and you have carried that
6 correct testing, et cetera, et cetera, then that usually
7 enforces compliance to the expectations of the team.

8 Q. Would peer reviews in coding be a normal or unusual
9 practice?

10 A. It's standard. It's expected.

11 Q. You say that it became obvious to you that there were no
12 unit-testing standards. Can you explain firstly what
13 you mean by unit-testing standards.

14 A. Yes. The nomenclature of testing gets a little bit
15 fuzzy depending on who you ask, but a coder should test
16 his own code, and he should test it not just in
17 isolation but also within the kind of landscape of all
18 of the other modules that live around it. So he will be
19 expected to carry out that unit test on an environment
20 which is -- although it's in a development environment,
21 it is representative of the latest release that's out in
22 the testing-hardware environment.

23 He should test that code himself thoroughly to
24 a degree that it's not as intensive as when it goes into
25 the test cycle, but it's pretty thoroughly tested for

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1 about programming in a language such as Visual Basic,
2 how to use variable names, what naming conventions you
3 use for your function calls, technical level stuff. The
4 reason for a document such as that is that, when you
5 have 8 or 10 or 20 people coding, they all produce
6 a similar-looking code which has the same naming
7 conventions so that, if the next person has to pick it
8 up, it looks very similar and it reads the same.

9 Q. You say in your statement that it became obvious to you
10 that there were no coding practices. Is that different
11 from the things you have just described?

12 A. Yes, similar. I think practices is a more generic term
13 which would cover testing, unit testing, so testing your
14 own code after you've produced it, producing
15 documentation to show what you have done, that kind of
16 stuff.

17 Q. You say, thirdly, that there were no peer reviews. Why
18 do you consider that to be a problem or a difficulty?

19 A. Well, I think it's human nature that, if anybody's left
20 to their own devices, they kind of start to drift
21 towards making life comfortable for themselves, which
22 might result in people writing code which does not
23 adhere to the standards you have agreed and, by
24 implementing peer reviews, that is enforcing the fact
25 that you have to show a colleague or a peer what you've

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1 the code that he's added or changed, but also in kind of
2 a doughnut shape around it, to make sure that he hasn't
3 affected anything else that that code might interface
4 with.

5 Q. Thank you. You say there were no design specifications
6 in place, but what do you mean by those?

7 A. I didn't see any design documents for the EPOSS counter
8 when I got there, to say, "This is the architecture of
9 the EPOSS counter. These are the modules." I think
10 a high-level design existed, but for the actual modules
11 which comprised the EPOSS counter to say, "This is the
12 cash account report, this is the selling a stamp bit",
13 whatever it is, those modules should have had
14 a low-level design document which detailed how it was
15 built, and what the functionality inside it was, and
16 what the interfaces were. Those documents I never saw.

17 Q. Who out of Post Office and ICL would be responsible for
18 drawing those up?

19 A. That would be ICL.

20 Q. You draw those points together by saying:

21 "In fact, this team was like the Wild West."
22 What did you mean by that?

23 A. Pretty much as it says on the tin. There were no
24 standards in place, there were no design documents. The
25 culture of the development team was -- I wouldn't say it

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1 was a holiday camp, but it was free format. There was
 2 no structure, no discipline; it was crazy, never seen
 3 anything like it.

4 **Q.** When people refer to the Wild West, they sometimes mean
 5 people acting in accordance with their own wishes, not
 6 according to standards or conventions or rules. Is that
 7 what you meant by --

8 **A.** Yes, I think, if you take that phrase, it probably means
 9 lawlessness, and that lawlessness I was trying to refer
 10 to was lack of standards, lack of rules, lack of
 11 discipline, lack of structure within the development
 12 team.

13 **Q.** You say that several of the development team were not
 14 capable of producing professional code. Did that impact
 15 in your view on the integrity of the EPOS system?

16 **A.** Fundamentally. If they weren't capable of demonstrating
 17 to me or an auditor or anybody else in the building that
 18 they could write a simple piece of code in
 19 a professional standard, then I had to ask myself: what
 20 have they been writing for the last 12 months or however
 21 long they've been there? What's under the bonnet in the
 22 system already that they've contributed?

23 **Q.** What, if any, concerns did you have as to the impact of
 24 the issues that you have just identified on the
 25 operation of the system when it was eventually used by

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1 That's not what we were seeing. What we were
 2 seeing was a constant high level of PinICLs being raised
 3 daily, and that number was not diminishing, and they
 4 weren't getting any simpler. They were becoming more
 5 and more complex as code was introduced.

6 You should also never see that volume. That
 7 amount of PinICLs -- as soon as I saw the number -- when
 8 you raise a PinICL, it gives you a new number, it's
 9 incremental. When I saw the number of the next PinICL
 10 to be raised, I was astonished at how many had already
 11 been through the system and closed, for us to get to
 12 that number that it was going to offer you next. So
 13 that tells you how many's been raised and closed
 14 already, which to me was completely out of kilter with
 15 the size of the project or the complexity of it.

16 So that, along with the fact that the number of
 17 PinICLs being raised was not diminishing, tells you that
 18 the quality of the code was -- you know, something
 19 wasn't right.

20 **Q.** How do you know that this was a company-wide, well-known
 21 fact?

22 **A.** Because it was quite a sociable project in the building.
 23 We mixed with all of the other test teams. I had a very
 24 good relationship with all of the test teams, and some
 25 of the other development teams who were developing

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1 subpostmasters?

2 **A.** Well, we're here today, aren't we? I think that's
 3 evidence in itself. It was clear -- it was clear that
 4 the system, as it was at that time, was never fit for
 5 purpose in a real-world environment. Everything I'd
 6 seen when I first arrived and everything I'd seen in the
 7 short period I was on the counter team told me that you
 8 should never be putting this piece of software into
 9 a live estate without at least fixing everything that we
 10 recommended needed fixing so it was fit for purpose.

11 **Q.** You say in paragraph 9 of your witness statement that it
 12 was:

13 "A company-wide well-known fact that there were
 14 several thousand outstanding bugs in the EPOS system."
 15 We have been told that any system of this size,
 16 not just looking at the EPOS system but Horizon
 17 generally, is likely to contain a number of bugs. To
 18 what extent were the bugs in the EPOS system usual in
 19 terms of number and severity or out of the ordinary?

20 **A.** Well, I think what you should see in a development
 21 life-cycle of a project or software is you might get
 22 a small number of bugs that make themselves evident to
 23 start with, obvious ones, glaring ones, but that should
 24 decrease over time, and the severity of them should
 25 decrease over time as well.

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1 things such as APS. If you look that PinICLs that were
 2 raised on those parts of the project, they were nowhere
 3 near as large in number as they were on the counter and,
 4 when you talk to these people, it was a standing joke,
 5 "You're in the EPOS team, good luck", or ... You know,
 6 it was *bête noir* of the building.

7 **Q.** You say in your statement that the EPOS team was the
 8 joke of the building; is that right?

9 **A.** Yes, I think everybody knew, specifically the test team
 10 who, when I spoke to those guys, they would make it very
 11 clear that the quality of code that was being delivered
 12 was to such a bad, poor level that they're wasting their
 13 time testing it, because they knew that it was just
 14 broken. They were going to end up raising lots of
 15 PinICLs from it. So they'd give a very frank and very
 16 honest opinion about the ability of some of the guys,
 17 not all of them -- some of them were good -- in the
 18 team, and the quality of the product that that team was
 19 producing. So it was a standing joke in the building.

20 **Q.** You say in your statement that this was known up to the
 21 highest level, including Fujitsu Japan, because they
 22 sent over three coders to perform an audit. Can you
 23 recall when that took place?

24 **A.** I'm afraid I can't recall whether it was before or after
 25 the task-force initiative. It was around about that

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1 era. It was probably late summer or maybe afterwards.
 2 It may have even been into the following
 3 pre-Christmas/post Christmas period.
 4 **Q.** So the task-force, we understand, the PinICL Task Force,
 5 to have been August and September '98?
 6 **A.** Yes.
 7 **Q.** And you can't recall whether the coders sent from Japan
 8 were before or after then?
 9 **A.** I can't, I'm afraid.
 10 **Q.** What kind of auditors were they? Were they from Fujitsu
 11 or were they external?
 12 **A.** They told me they were -- they were Japanese and they
 13 were from Fujitsu in Japan. So, as far as I understood,
 14 they were Fujitsu employees.
 15 **Q.** What did they do?
 16 **A.** They spent maybe two days, maybe three days -- I gave
 17 them a desk with an EPOS development counter in the team
 18 and showed them around little bits, where to find the
 19 software, how to get access. I called in a couple of
 20 the guys to help talk them through some of the modules
 21 they wanted to look at. It was very brief and arm's
 22 length, but they spent two or three days looking at the
 23 very lowest level, the code, some of the reference data,
 24 how the counter was built, et cetera. It was mostly
 25 a code review.

21

1 improving things that dramatically.
 2 I already at that point had a view on what needed
 3 to be done, and it was when Steve Warwick went on
 4 three-week vacation that I kind of had the opportunity
 5 to speak to Terry more directly without Steve Warwick
 6 being there. He fronted that relationship on behalf of
 7 the team up to that point. As he was away on vacation,
 8 I got the opportunity to kind of talk to him more
 9 directly.
 10 But also at that time there was some important
 11 test cycles coming up, such as model office releases and
 12 things like that, which were quite important to the
 13 roll-out schedule of the project and, given that, with
 14 the amount of PinICLs that were being raised by the test
 15 team, it was an opportunity to use the importance of
 16 that delivery with the amount of PinICLs we were
 17 experiencing to emphasise to Terry that we need to do
 18 something dramatic about this, otherwise we're going to
 19 fail, and that's when Terry and I -- he asked me what I
 20 needed, "What do we do, what do you need?" I kind of
 21 described what I thought we could do, you know, if I was
 22 given the right resources and the correct time,
 23 et cetera, et cetera, and he instigated the task-force
 24 and gave me *carte blanche* to pick whoever I needed from
 25 the building to join the task-force to help us.

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1 **Q.** What was the outcome of that audit by these coders from
 2 Japan?
 3 **A.** No idea. They came, they sat, and they went, and they
 4 didn't speak to anybody.
 5 **Q.** Was any report to your knowledge produced back to you at
 6 least --
 7 **A.** No.
 8 **Q.** -- of the outcome of the audit of the code?
 9 **A.** No.
 10 **Q.** To your knowledge, did Terry Austin have any contact
 11 with the three Fujitsu Japan coders?
 12 **A.** Yes. Well, he told me they were coming and I was to
 13 facilitate whatever they needed, but that's the extent
 14 to what I know.
 15 **Q.** There came a time when a task-force was set up, as it
 16 was called, PinICL Task Force can you explain the
 17 circumstances in which it came to be set up.
 18 **A.** Yes, I was probably a few months into working in the
 19 team. By then I had a pretty good grasp on how much
 20 trouble that part of the project was in. I'd spent
 21 several months trying to work with Steve and Chris
 22 Humphries and Terry to get them to understand where we
 23 were and how it was, without making much headway.
 24 It was basically everything was carrying on as
 25 normal and I wasn't really making any progress in

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1 **Q.** Did you do that?
 2 **A.** Yes.
 3 **Q.** Was a report produced as a result of the work undertaken
 4 by the PinICL Task Force?
 5 **A.** Yes, it was.
 6 **Q.** Can we look, please, at FUJ00080690. It will come up on
 7 the screen for you, Mr McDonnell. You can use the paper
 8 copy if you wish. Is this the report that you are
 9 talking about?
 10 **A.** Yes, it is.
 11 **Q.** Just to introduce it by its abstract first, it says:
 12 "This document reports on the activities of the
 13 EPOSS PinICL Task Force which was in place between
 14 19 August and 18 September 1998 to reduce to manageable
 15 levels the EPOSS PinICLs outstanding at that time."
 16 Is that an accurate description in high level
 17 summary?
 18 **A.** Yes.
 19 **Q.** Just look, please, at the dates of the reports that
 20 we've got. This is the report that we've all been
 21 working from to date because it was the only one that we
 22 had. Can you see that it's dated in the top right-hand
 23 corner 14 May 2001? It's said to be version 1 and it
 24 carries the reference IA/REP/008.
 25 Can you go over the page, please, Frankie. Can

24

1 you see on Document History that version 0.1 is said to
2 have been produced on 18 September 1998 and was the
3 initial draft following Task Force completion. So
4 that's at the end of the period, the date period,
5 described in the abstract, 18 September 1998. Would
6 that accord with your recollection, that it was produced
7 shortly after or at the very end of the Task Force work
8 itself?

9 **A.** Yes.

10 **Q.** Was it being written as you went along?

11 **A.** Yes, it was. I mean, we were gathering evidence and
12 understanding as we went, yes.

13 **Q.** If we go back to the first page of this document,
14 please, can we display at the same time FUJ00121098.
15 FUJ00121098. If we crop -- thank you.

16 We can see here a further version of the report
17 that's been recently disclosed to us. You can see that
18 the title is the same and the abstract is the same.
19 It's still said to be a draft. The version number is
20 0.1 which is obviously before by convention, I think,
21 1.0; is that right?

22 **A.** Yes.

23 **Q.** The date is said to be 16 February 2000, which obviously
24 wasn't one of the dates mentioned in the document
25 history when we looked at page 2 of the previous

25

1 **A.** Mm-hm.

2 **Q.** So there ought to be a version 0.3 available --

3 **A.** Yes.

4 **Q.** Would that be right?

5 **A.** Yes, I'd say so.

6 **Q.** Can we go back, please, to the first one we were looking
7 at which is the one we're using because it is version
8 1.0 which is FUJ00080690. You will see, if we scroll
9 down a little bit, please, that you are one of the
10 co-authors. Is that right, that you co-authored this
11 document?

12 **A.** Yes.

13 **Q.** What form did that co-authorship take? Did one of you
14 write it and the other one approve it, both of you write
15 it, both of you write bits of it; how did it work?

16 **A.** I think Jan was the kind of audit expert running with
17 the document, and my contributions would have been made
18 by -- I'm not sure I would have opened the document
19 myself and typed it in, or whether I emailed him the
20 text and he posted it into the document -- more likely.

21 **Q.** Both of you signed it off; is that right?

22 **A.** Yes.

23 **Q.** Rather than just one of you?

24 **A.** Yes.

25 **Q.** So it was your joint work?

27

1 version.

2 Then, if we can go to the second page of this
3 document, please, the one on the right, we can see
4 version 0.1, which coincidentally is also this version
5 or said to be this version, the one of 16 February 2000
6 is dated 18 September 1998.

7 Looking at that information, do you believe that
8 there ought to exist a version dated 18 September 1998
9 called initial draft following Task Force completion?

10 **A.** Yes, my understanding is that we 0.X were drafts, and
11 then once it's formalised it becomes version 1.0. So
12 that date fits, and that's certainly the document that
13 we contributed to.

14 **Q.** Just one other piece of information on this dating and
15 version issue. Can we look, please, at FUJ00079782.
16 This is a completely different report dated
17 28 October 1999. You will see what it is from the
18 abstract there. Can we go to the second page, and go
19 down please.

20 By convention Fujitsu reports list documents that
21 are associated with the document that's being written.
22 Can you see at item 6 there is a reference to IA/REP/008
23 which is said to be version 0.3 and dated
24 29 September 1998 with the correct title Report on EPOSS
25 PiniCL Task Force?

26

1 **A.** Well, Jan would have come to me and made sure I was
2 happy with the content, and we both agreed to sign it
3 off, yes.

4 **Q.** Looking at the distribution list, can we just run
5 through it and can you explain why it went to each of
6 those people. First Terry Austin.

7 **A.** Well, Terry's program manager for the development team.
8 He has the ultimate decision on, or responsibility for
9 the counter code, what needs to be done, and I believe
10 he reported to Martyn Bennett, who obviously needs
11 copying, because there were some quite serious issues
12 inside the document that he should be aware of.

13 **Q.** What level was he within the company?

14 **A.** I'm not exactly sure. I think he was senior to Terry
15 Austin.

16 **Q.** D McDonnell: why were you getting a copy back?

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

18 **Q.** Library: what was the library; was that a physical
19 library or an electronic library?

20 **A.** I believe Jan would have copied that so that it was
21 archived, but probably he could answer that better than
22 me.

23 **Q.** Was that a physical library or --

24 **A.** I believe it was electronic.

25 **Q.** What was the purpose, to your understanding, of Fujitsu

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1 having a library of documents like this?

2 **A.** Days like today, I guess. I think as an auditor it's

3 probably the audit trail.

4 **Q.** If we look at the approval authorities on page 2,

5 please, firstly, what is an approval authority?

6 **A.** I'm not sure in that context. I don't know what that

7 would mean. Whether it just means that the document's

8 been signed off as accepted by the recipients, I'm not

9 sure.

10 **Q.** Can you now recall what happens if somebody didn't give

11 their approval?

12 **A.** No, I can't. I don't really understand what that term

13 would result in, what that was for in the document.

14 **Q.** In the earlier version that we've got the version 0.1,

15 said to be dated 16 February 2000 -- you remember the

16 other one I showed you?

17 **A.** Mm-hm.

18 **Q.** The second approval authority was Martyn Bennett. Have

19 you got any knowledge of him giving approval for the

20 document?

21 **A.** No. I think, once that's gone up and has been released,

22 it would have been by email copy. I never heard any

23 feedback from anybody on that list other than Terry

24 Austin. I certainly didn't ever have anything back from

25 Martyn Bennett.

29

1 **Q.** Secondly, he says there was a concern which he

2 considered to be the greater of the two concerns which

3 related to the impact of continual changes to existing

4 code to fix problems and/or to insert new functionality

5 into the code. Do you agree with Mr Holmes that that

6 was a concern?

7 **A.** I do and, in fact, within this document there's a very

8 good example of that when, during the Task Force, which

9 was supposed to be all about getting the quality under

10 control, they took away some of the resource to force in

11 extra functionality for, I think it was balancing and

12 something else. There's three parts to it. It's

13 referred to in the document somewhere. But it was

14 a sizeable piece of development work which was being

15 developed on the fly and shoehorned into the code, right

16 in the middle of the Task Force initiative, where we

17 were trying to stabilise the product, and that's

18 a typical example of not understanding the problem of

19 where we were at the time and continuing with the same

20 bad behaviour, in my view.

21 **Q.** Those two concerns that Mr Holmes mentions and which you

22 agree with, in your view, would they have had any impact

23 on the integrity of the system, how it operated or how

24 it was operated by subpostmasters?

25 **A.** Yes, it would. It would result in functional errors,

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1 **Q.** I should just say, for the record, track change

2 comparing the two versions that we've got show that the

3 only changes are the addition on this version on 0.1

4 there of "1.0 14/5/01 raised to version 1.

5 Administrative catch-up" and that change from Mr Bennett

6 to Mr Holmes as well as, obviously, the version number

7 and the date that appears on the top right-hand corner

8 of each page.

9 Do you know what administrative catch-up meant or

10 means?

11 **A.** No, I don't.

12 **Q.** Mr Holmes, as you said, he's a witness in the Inquiry

13 who is going to give evidence to us later today, worked

14 for Pathway as an audit manager and, in his written

15 evidence at least -- the cross-reference needn't be

16 displayed, WITN04600100 -- at paragraph 9F identifies

17 two concerns.

18 He says that there was a concern about the

19 technical accuracy and structure of the EPOS code when

20 it had been written. Do you agree with that

21 description?

22 **A.** Yes.

23 **Q.** Did you discuss that with him -- Mr Holmes?

24 **A.** Yes, we will have done during the Task Force period at

25 least, yes.

30

1 bugs, spurious behaviour.

2 **Q.** Was that a view held by you and others at ICL Pathway at

3 the time?

4 **A.** Yes, it was. I think it was a belief that was pervasive

5 throughout the building.

6 **Q.** Can we look, please, at page 4 of the report and just

7 read the introduction:

8 "During the week commencing 17 August the EPOSS

9 Counter PinICL Stack Reduction Team, known as the task

10 Force, was established. The objectives, current

11 workload, composition, outline process and targets were

12 presented to the team on Tuesday 18, with a formal start

13 date of Wednesday 19th August 1998.

14 "This report presents the outcome of the Task

15 Force activity and identifies factors which prevented

16 the original target (zero or near to zero residual

17 PinICLs) being met."

18 Just stopping there, was that the target of the

19 Task Force?

20 **A.** So this is an interesting point. That is the written

21 kind of objective, the most desired outcome that would

22 be great if we could get the PinICL stack down. My

23 personal view was that we'd never be able to reach zero

24 PinICLs, because we knew that the code was in such a bad

25 state that that would never happen. So I think there

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1 was kind of a difference between the expected outcome
2 from people like Terry Austin and the expected outcome
3 from the people who had a technical understanding of
4 what was happening on the ground.

5 Terry's ideal world would be that we get back to
6 zero PinICLs and the ship sails on, whereas the people
7 on the ground who actually knew what was happening and
8 the state of the code were expecting the outcome --
9 personally, myself personally, was that hopefully this
10 gives us sufficient evidence to be able to move the
11 project on to a different footing, which would be
12 corrective, such as rewrite the cash account and the
13 various other recommendations that were made. I was
14 under no illusion at all or belief that there would be
15 zero PinICLs that end of this.

16 **Q.** I was going to ask you about that, because this report
17 does not just report on the work of the PinICL Task
18 Force and the reduction in the number of outstanding
19 PinICLs, it takes the opportunity to make a series of
20 significant criticisms on EPOS.

21 **A.** Correct.

22 **Q.** Was that deliberate?

23 **A.** That is what I was alluding to. This was an opportunity
24 for the technical people who understood it to get this
25 stuff onto the paper and get it front of some senior

33

1 program to address the shortcomings identified."

2 I'm going to skip over Scope. I'm going to skip
3 over Management Summary at the foot of that page and go
4 to the page 5, please. You say:

5 "The EPOSS Task Force was established to address
6 the problem of the escalating number of PinICLs residing
7 in the EPOSS-Dev and Counter-Dev stacks and was planned
8 to operate for the five weeks leading to the MOR3
9 baseline cut on 18 September."

10 Can you remember what the MOR3 baseline cut on
11 18 September was?

12 **A.** I think it was model office. I don't know what the R
13 stands for, but that was one of the key pillars of the
14 acceptance testing plan, and so that had to be
15 successful in order for the acceptance testing to
16 progress.

17 **Q.** "The objective was to reduce the PinICL count to zero or
18 low tens by the cut-off date, and the target that set by
19 dividing the current PinICL count by the number of days
20 available. The paper made no concession towards new
21 PinICLs being raised during the period and assumed that
22 the personnel assigned to the exercise would be
23 available 100 per cent of the time and be 100 per cent
24 effective.

25 "The position at 1 o'clock on 18 September is that

35

1 people with evidence, to show them what kind of a state
2 we were in and what needed to be done. It wasn't just
3 about: let's go and fix a thousand PinICLs and the
4 problem goes away. So this document was used as
5 a vehicle to kind of put that evidence in place and get
6 it in front of somebody.

7 **Q.** The report continues:

8 "During the course of the Task Force it became
9 clear that there are significant deficiencies in the
10 EPOSS product, its code and design, and these are also
11 presented in this report."

12 Did it only become clear during the Task Force
13 that there were significant deficiencies in EPOSS code
14 and design, or did you in fact know about that
15 beforehand?

16 **A.** We knew about that beforehand.

17 **Q.** I think you are saying that this was an opportunity to
18 make it clear?

19 **A.** So that had been voiced vociferously throughout the
20 project. Not just myself but the test team had voiced
21 that view to everybody beforehand. But this was a kind
22 of formalisation and a last chance to get that evidence
23 enforced really in documented format.

24 **Q.** "Finally, the report contains recommendations from the
25 authors which we believe should be implemented by the

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1 166 PinICLs have been fixed and closed and 165 remain
2 in ..."

3 Is that "work in progress"?

4 **A.** Yes.

5 **Q.** "This indicates the Task Force has failed to meet its
6 prime objective."

7 Then you say this:

8 "However, a review of the Task Force period
9 provides an insight into why it was unable to meet its
10 objective. This Management Summary provides an overview
11 of that period and is supported by the main body of the
12 report."

13 Can we go to some of the whys, please, rather than
14 looking at the PinICL-reduction exercise and go over the
15 page to page 6, and look at EPOSS documentation which is
16 a bit further down. You say:

17 "The document suite supporting the EPOSS product
18 code consists of three main elements ..."

19 You set them out.

20 "All of these were developed by reverse
21 engineering the EPOSS product code at that time."

22 Are you saying by that paragraph, those sentences,
23 that the EPOSS product code was reverse engineered, or
24 that the documentation was reverse engineered?

25 **A.** I believe it's the documentation it's referring to.

36

1 Q. If we go forwards, please, to page 16, we can see in the
2 top three paragraphs a reference to those three
3 documents. Can you see that:
4 "The returned product was then reverse documented
5 and version 3.2 of the EPOSS Functional Specification
6 produced in December '97."
7 A. Yes.
8 Q. Then in the next paragraph you say:
9 "During April '98 an EPOSS High-Level Design
10 document" --
11 You say "reverse engineered"; do you mean reverse
12 documented?
13 A. Yes.
14 Q. Similarly, in the next paragraph:
15 "Corresponding Low-Level Design documents were
16 developed during July '98 by ISTL, again reverse
17 engineered" --
18 But do you mean reverse documented from the code?
19 A. Yes.
20 Q. Is there a difficulty with reverse documenting?
21 A. So what they've done is they have basically taken the
22 code as it's written and they've produced the design
23 specification which should have produced the code, and
24 they've written the design document afterwards to match
25 the code that was already in place. So they are

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1 Q. Do you know whether Post Office was told about this?
2 A. I wouldn't know that. But that is indicative of
3 somebody has to -- some standards have to be met.
4 Somebody's going to do an audit to say: are the right
5 documents in place? Well yes, they are now, but they
6 weren't when the code was written. So it looks good on
7 paper, but that isn't the design waterfall flow that
8 should have been followed.
9 Q. Can we go back to page 7 of the report, please. Under
10 EPOSS code in section 7.2, you say:
11 "It is clear that senior members of the Task Force
12 are extremely concerned about the quality of code in the
13 EPOSS product."
14 Who were the senior members of the Task Force that
15 were extremely concerned?
16 A. I consider the senior members to be myself and Jan, and
17 Jan can speak for himself later, I guess, but there was
18 probably two or three technical people that were brought
19 into the Task Force team who had excellent credentials,
20 and they did some of the low-level analysis as part of
21 the Task Force team, and I guess together, myself with
22 those two or three guys, we all formed the same opinion.
23 Q. You used the words "extremely concerned about the
24 quality of the code". Why were you extremely concerned?
25 A. Well, it's -- it was so bad. It was beyond anything

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1 chronologically reversed.
2 Q. Is there a problem with that?
3 A. Well, other than the fact it's the horse before the
4 cart, no. It's a very simple task of looking at the
5 code to see what it does, and writing a document to say
6 so. It's never going to be wrong because you've read
7 the code and it matches.
8 Q. So what you are saying is that one should start with
9 a specification, one should start with a high-level
10 design document, one should start with a low-level
11 design document, and then write product code
12 accordingly, to those specifications and designs, not
13 the other way round?
14 A. Yes.
15 Q. Who was doing the reverse documenting here?
16 A. I think they got some technical authors in. They are
17 referring to ISTL, but I can't remember who that was.
18 We didn't really have a great deal to do with it in the
19 counter team, because it was -- it's a moot point, that
20 documentation.
21 Q. What do you mean, it's a moot point?
22 A. Well, instead of it contributing to having a design
23 document which specifies how the code works, they're
24 basically writing a document which mirrors what's
25 already been done. So to us it was irrelevant.

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1 I've ever seen. Even in the 25/30 years since that
2 project, I've never seen anything like that before.
3 Some of the stuff that we found buried in the code was
4 unbelievable. There was unreachable code. I mean, we
5 pulled out some of the better examples --
6 Q. We're going to come to those.
7 A. That was a small number of examples as to what we found.
8 Just the whole -- you could see looking at the code, the
9 way it was written, the different modules, no standards
10 had been followed. It was a mess.
11 Q. You say:
12 "Earlier this year the EPOSS code was
13 re-engineered by Escher, and the expectation is that the
14 work carried out in Boston was to a high standard and of
15 good quality."
16 Can you explain that process, what happened there.
17 A. I don't know. That was before I arrived. I'm not aware
18 as to how much rewriting they did or reverse engineering
19 they did.
20 Q. You say:
21 "Since then many hundreds of PinICL fixes have
22 been applied to code."
23 Here are you just referring to the EPOSS code?
24 A. Yes.
25 Q. "... and the fear is that code decay will, assuming it

40

1 hasn't already, cause the product to become unstable."
 2 What did you mean by code decay, please?
 3 **A.** Code decay occurs if you have to revisit the code and
 4 rewrite it to fix bugs that have been raised. The
 5 danger is that you start to -- the code that was written
 6 with its initial intent starts to diverge away from what
 7 should have been a clear specification. The more
 8 frequently you do that, the more divergence there is,
 9 until in the end the code that you're left with bears
 10 little resemblance to the original design specification.
 11 **Q.** You say:
 12 "This presents a situation where there is no
 13 guarantee that a PinICL fix or additional functionality
 14 can be made without adversely affecting another part of
 15 the system."
 16 **A.** Yes, because what we were seeing in -- there was that
 17 many PinICLs being raised, and guys had gone in and they
 18 might put a two-or-three-line- fix in or a very small
 19 correction, but there was that many of them, some of the
 20 corrections you couldn't understand why that correction
 21 had been made three or four months ago, for example,
 22 because it's not documented. There was no documentation
 23 to show why that particular line had been changed. So
 24 somebody might go in and say, "That's wrong", and they'd
 25 change it back to suit the case that had been written

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1 "Four examples are presented [later]."
 2 Can we move on please to page 12 of the report at
 3 paragraph 6.2. You refer in this paragraph to:
 4 "... poor quality workmanship from some of the
 5 more experienced team members as evidenced by an average
 6 33 per cent reject rate from unit test and a failure of
 7 every build due to missing RD or code.dlls."
 8 Can you elaborate what you mean by "poor quality
 9 workmanship" that you here describe.
 10 **A.** Yes. So what was happening was the project, or the
 11 EPOSS counter team, had got into such an exhausted state
 12 that the culture had become: throw a fix in the code,
 13 throw it over the fence at the test team. There was
 14 very little control of the release mechanism from the
 15 development team into the test team.
 16 So sometimes a lot of this stuff could have been
 17 really stupid things such as they'd only partially
 18 release the fix. Some of the modules or little bits of
 19 software that had to go with it, such as a DLL file or
 20 a header file, were missing from the work package that
 21 was released over to the test team.
 22 It could be of that nature. It could also have
 23 been just the quality of the fix itself was -- as I was
 24 referring to earlier, they'd fix this bit but that would
 25 break it over here. So that was very typical of what we

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1 today, without understanding that it now reverses the
 2 fix that was made maybe several months ago for a
 3 different reason.
 4 **Q.** You continue:
 5 "A more worrying concern from the Programme's
 6 perspective should be the reliance on the EPOSS product
 7 in its current state as a basis for planning and
 8 delivery. ... there was relatively little testing that
 9 directly impacted ... yet more than 200 PinICLs, roughly
 10 50 a week were raised. Immediately following the
 11 conclusion of the Task Force, it is intended to re-run
 12 System Test Main Pass and various other test streams.
 13 While I am confident that the fixes delivered by the
 14 Task Force will prove to be reliable, I fully expect the
 15 PinICL rate to increase as further testing is carried
 16 out."
 17 The "I" in that sentence, is that you or
 18 Mr Holmes?
 19 **A.** I think that sounds like Jan's paragraph, looking at the
 20 wording, but I would agree with it. If you replace it
 21 with "we", I don't think it would ...
 22 **Q.** You continue:
 23 "Lack of code reviews in the development and fix
 24 process has resulted in poor workmanship and bad code."
 25 Then you say:

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1 were seeing at the time.
 2 **Q.** Thank you. Can we go forwards, please, to page 15 and
 3 the bottom half of the page under 7.1.1, under
 4 Documentation Suite, you say:
 5 "The EPOSS product was originally developed using
 6 RAD ..."
 7 What does RAD mean?
 8 **A.** That stands for rapid application development.
 9 **Q.** "... techniques as part of the Joint Working Agreement
 10 in force during Release 1. This approach carries
 11 a number of attendant risks, not least of which is the
 12 lack of formal specification."
 13 Can you explain why the RAD technique carried with
 14 it attendant risks, please.
 15 **A.** Yes. So what they have done there as part of the bid
 16 process is to use something that was often referred to
 17 as rapid prototyping, where you would throw up
 18 a skeleton kind of *pro forma* of what you think it might
 19 look like and how it might work, but without much engine
 20 room behind it, if you like, and that is very sensibly
 21 used for a bid process or a proof of concept or
 22 something like that.
 23 What appeared to have happened here is that they
 24 used that and progressed it forward into the main code
 25 base, rather than actually saying, "Okay, we've got

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1 a prototype we know what it should look like and what it
2 intends to be for proof of concept. We're now going to
3 start it from afresh and design this properly using good
4 engineering principles and design processes and start
5 from afresh using the prototype as a model to work
6 from." But you would never use that code in the real
7 product. You'd start again.

8 Now --

9 **Q.** Just so I understand it, if you were an architect or
10 a builder building a house, you might want to build
11 a model of it using balsa wood --
12 **A.** Exactly. You never use the model for the bridge, even
13 if it was one-to-one life size. That's what they did
14 and, back in the day, there was a design development
15 methodology called rapid prototyping, which was
16 a pre-cursor to what is known today as Agile, which came
17 out of California. But back in those days rapid
18 prototyping was very immature, and it should never have
19 been used on a project of this size/complexity. So
20 they've kind of half used that as an excuse to justify
21 why they've taken the initial prototype and used it
22 moving forward.
23 **Q.** Can we turn over the page, please, to page 16. Thank
24 you. In paragraph 7.1.2, at the foot of the page, you
25 say that:

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1 on the basis of the 'accounting cycle', POCL wanted it
2 to reflect their business processes. The result was
3 that POCL were invited to develop 'solution proposals'
4 which if acceptable would be factored into version 3.3
5 to provide the level of detail requested by POCL. To
6 date some 57 solution proposals have been presented by
7 POCL, although only 6 have been reviewed and passed for
8 inclusion in the specification."

9 Can you help us with what the solution proposals
10 related to.

11 **A.** They were business functionality, as perceived by POCL,
12 of how they wanted the counter to operate.

13 **Q.** Can you remember what happened as a result?

14 **A.** Well, these were -- Steve Warwick would field these with
15 POCL, and he would feed them into the counter
16 development team as requirements, and then the guys
17 would work on that functionality and introduce it to the
18 code. I don't know -- I can't remember how many of
19 these actually came to full fruition or were developed
20 out.

21 **Q.** You say:

22 "The final area of difference revolved around the
23 EPOSS issues list."

24 What was the EPOSS issues list?

25 **A.** I believe that was not a risk register but an issues

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1 "POCL identified three major gaps in the EPOSS
2 product, namely Discounts, Transfers and Stock Unit and
3 Office Balancing -- referred to as the three papers --
4 and these were required for implementation into EPOSS."

5 Can you remember when these issues, the three
6 papers, were identified by Post Office Counters Limited?

7 **A.** My first awareness came about the start of the Task
8 Force or shortly before. This is indicative of exactly
9 how Steve Warwick used to work. He was the interface
10 with POCL, and he was the person who would be discussing
11 with them what the business requirements were for the
12 EPOSS counter, and stuff like this used to pop up all
13 over the place. "Oh, by the way we have this; by the
14 way we have that."

15 This was introduced at the last minute as
16 a must-have requirement for model-office testing or
17 model-office acceptance. So it's an example of quite
18 a sizeable piece of work that was being stuffed into the
19 code in a very rushed, last-minute way, right in the
20 middle of a Task Force which was absolutely essential
21 for model-office acceptance.

22 **Q.** In the next paragraph you say:

23 "A third issue raised by POCL was the manner in
24 which the proposed functionality had been presented in
25 the specification. Whereas version 3.2 described EPOSS

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1 register that was managed between -- that's the kind of
2 interface between ICL and the Post Office, where the
3 list of known issues which had to be managed away or
4 explained before Post Office would accept the product.

5 **Q.** What kind of issues would feature on that list?

6 **A.** Cash account, missed balancing, blue screening.

7 **Q.** And:

8 "This was, [it is said], replaced by the 'Request
9 for Clarification' process ..."

10 Can you recall why it was replaced by the request
11 for clarification process?

12 **A.** I don't know. I wasn't involved in that.

13 **Q.** And it says:

14 "To date some requests for clarification have been
15 received by POCL."

16 What sort of issues were raised in the 90 or so
17 requests for clarification?

18 **A.** So those would be -- once Steve Warwick had brought the
19 requirement into the development team, it may be that
20 the business analyst or some of the developers might be
21 raising questions on how exactly this is supposed to
22 work, or this piece of functionality was to operate in
23 real life. So those questions would be raised back to
24 POCL via those RFCs.

25 **Q.** Would those matters impact on the integrity and

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1 robustness of the system?
 2 **A.** Yes, the more toing and froing -- and this generally
 3 used to happen after the code development had started.
 4 So, if they came back with a different answer to what
 5 was expected some, of that code may have to be modified.
 6 **Q.** Can we turn to the next page in paragraph 7.3 of the
 7 report, so page 17. In the box above the text it says:
 8 "This section has been produced with the
 9 assistance of Dave McDonnell [you] and Martin Smith ..."
 10 Who was Martin Smith?
 11 **A.** Martin Smith was a developer from another team in
 12 a different part of the building, and he was one of the
 13 people who was asked to join the Task Force.
 14 **Q.** Why was he asked to join the Task Force?
 15 **A.** Because he was probably one of the most capable people
 16 in the building in terms of development.
 17 **Q.** You say:
 18 "Although parts of the EPOSS code are well
 19 written, significant sections are a combination of poor
 20 technical design, bad programming and ill thought-out
 21 bug fixes. The negative impact of these factors will
 22 continue and spread as long as the PinICL fixing culture
 23 continues. This is partly due to the nature/size of the
 24 bug-fixing task and partly due to the quality and
 25 professionalism of certain individuals within the team.

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1 fact that it's been written tells you that the person
 2 who wrote it doesn't understand. So that's a red flag
 3 or a flare to say, if they thought that that was
 4 necessary, what else have they gone and done in the code
 5 elsewhere? So that's evidence that you couldn't trust
 6 the rest of the code.
 7 **Q.** Can we look at page 19, please. You give an example of
 8 unreachable code. What does unreachable code mean?
 9 **A.** Those three lines would never be executed under any
 10 circumstances, because the logic of the code would
 11 not -- would never fall into that part of the code.
 12 **Q.** Unreachable code means that the function will not be
 13 carried out?
 14 **A.** Correct.
 15 **Q.** Executed?
 16 **A.** Yes.
 17 **Q.** In a scheme of sort of mildly poor practice to
 18 fundamentally wrong, where does this sit?
 19 **A.** That's about as bad as it gets. I mean, if that piece
 20 of code was actually critical to the cash account or
 21 selling a stamp, you'd never be able to achieve the
 22 expected outcome in a business sense.
 23 **Q.** Example 3 at the foot of the page, "poor workmanship and
 24 patchwork PinICL". I have to admit I didn't completely
 25 understand this one. Can you help to explain it,

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1 The problem is probably best illustrated by examples."
 2 Then you give some examples.
 3 Can you look at the example, example 1. Can you
 4 explain to us what the problem is.
 5 **A.** Yes. Somebody's written a function here which is called
 6 by a part of the code to reverse the sign of an integer
 7 or something, and basically it surmounts to: number
 8 equals number times minus 1. Why would you write
 9 a function to do that? It basically demonstrates two
 10 things, really: First of all, a complete lack of
 11 understanding of basic mathematics which I think is
 12 written below; and, secondly, I just can't understand
 13 why anybody would write that. It's beyond
 14 comprehension.
 15 **Q.** You say over the page:
 16 "Whoever wrote this code clearly has no
 17 understanding of elementary mathematics or the most
 18 basic rules of programming."
 19 You referred in that paragraph to the quality and
 20 professionalism of certain individuals within the team.
 21 Were they the individuals that you referred to earlier?
 22 **A.** Yes.
 23 **Q.** How might an example, example 1 in your document here,
 24 affect subpostmasters on the ground?
 25 **A.** That actual example would function correctly, but the

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1 please.
 2 **A.** Yes. This one's a little bit more kind of nuanced that
 3 somebody's written this as an "If, then Do", et cetera,
 4 et cetera, when really there's a very simple "While Do"
 5 loop that should have been used which is much, much
 6 cleaner and more accurate. I'm not sure why we thought
 7 that was a patchwork PinICL. Maybe at the time there
 8 were some comments to say that this had been inserted or
 9 amended in order to fix a PinICL.
 10 **Q.** Hence patchwork?
 11 **A.** Yes.
 12 **Q.** Then, lastly before the break, over the page, please,
 13 example 4 Hard Coding. You say that that is an example
 14 of hard coding which might have been made for a good
 15 reason, but there's no evidence of review to remove.
 16 What did you mean by that?
 17 **A.** Well, if you're trying to fix quite a complex PinICL,
 18 it's sometimes the very quickest route to get there is
 19 to hard code the specific example of the bug you're
 20 trying to fix, to get it to work properly, which is why
 21 they've got a hard-coded date in there, and some of
 22 these numbers at the bottom in the middle, sorry, are
 23 hard coded. But having understood and resolved the
 24 problem, what should happen is at that hard coding
 25 should be taken out and it should be either

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1 parameterised, which means that you can change it in
 2 a header file very easily as text, without having to
 3 recompile the code, or in some instances it may be
 4 referring to reference data where it should have been
 5 rectified in reference data which can be easily passed
 6 down to the counter without a software release.

7 **Q.** Thank you very much for that explanation, Mr McDonnell.
 8 Sir, that's an appropriate moment to take a break if it
 9 suits you?

10 **SIR WYN WILLIAMS:** How long do you think we should take
 11 given the need to move smoothly, so to speak?

12 **MR BEER:** We're on track, sir, to finish by lunchtime. So
 13 15 minutes, please.

14 **SIR WYN WILLIAMS:** Mr McDonnell, everybody knows that
 15 Mr Holmes is listening to your evidence. I am sure you
 16 wouldn't think of it but, if you do think of it, don't
 17 have a word with him about it in any break, all right?

18 **A.** Understood.
 19 **(11.23 am)**
 20 **(A short break)**
 21 **(11.41 am)**
 22 **SIR WYN WILLIAMS:** Yes, Mr Beer.
 23 **MR BEER:** Thank you. Mr McDonnell, can we go back, please
 24 to FUJ00080690, the report, and the first page of it.
 25 You see on the distribution it's got Mr Austin,
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1 witness statement WITN00620100 and at page 3 of the
 2 witness statement, please. At the foot of the page,
 3 paragraph 12 having exhibited the report you say:
 4 "I understood the underlying cause of concerns to
 5 be that the bid had been won using a prototype which had
 6 then been further developed upon instead of starting
 7 afresh properly."
 8 You have explained that to us already.
 9 "Additionally there had been a lack of formalised
 10 signed-off designs, a lack of discipline, a lack of
 11 professional qualifications in key positions ..."
 12 You have explained that to us already. Then you
 13 say:
 14 "... a total disengagement of the chief architect
 15 Gareth Jenkins ..."
 16 Just stopping there, did you know Gareth Jenkins
 17 at the time of your work from Easter '98 onwards?

18 **A.** Yes.
 19 **Q.** What was the extent of your work contact with him?
 20 **A.** Almost zero. So my understanding was that Gareth worked
 21 alongside another chief architect under Alan Ward. Now
 22 Gareth Jenkins' responsibility was specifically to the
 23 EPOSS counter system. As the chief architect, I would
 24 have expected him to be much more involved in overseeing
 25 a lot of the previous coding standards and methodologies
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1 Mr Bennett, yourself and the library. You've mentioned
 2 Chris Humphries and Steve Warwick as being important
 3 members of the team. Why was the report not addressed
 4 to them?

5 **A.** I don't know recall why. Might have been a better idea
 6 to do so, a more expansive distribution list, in
 7 hindsight.

8 **Q.** You've addressed it to two senior people, Mr Austin and
 9 Mr Bennett. Can you assist whether there was any view
 10 at the time that, if you'd addressed it to Mr Warwick or
 11 Mr Humphries, something different might have happened?

12 **A.** Okay, so I'm going to give my honest kind of reflective
 13 view on this, that Steve Warwick was on the other side
 14 of the camp, that no rewrite was necessary, everything
 15 was fine, ship's sailing on nice. So he wasn't going to
 16 effect change as a result of this document. In fact, he
 17 was probably against the recommendations.
 18 Chris Humphries couldn't do anything about it.
 19 We'd already tried that route, myself and Chris, before
 20 the Task Force was initiated and, therefore, we already
 21 knew that Chris couldn't do anything about it under his
 22 own initiative. It needed a sign-off and the commitment
 23 of Terry Austin, Martyn Bennett. That's probably why
 24 it's a more limited distribution list.

25 **Q.** I understand, thank you. Can we look, please, at your
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1 and things like that, and certainly the design documents
 2 that we've referred to earlier.
 3 I was quite surprised that he was based in
 4 Bracknell. I had to dig him out rather than him coming
 5 to the building to visit the team. Unless I made
 6 a specific effort to try and talk to him about
 7 something, he was just not present on the project.

8 **Q.** Is that what you mean by total disengagement?
 9 **A.** Yes.
 10 **Q.** If we go forwards, please, to page 4 of your witness
 11 statement at the foot of the page, at paragraph 16, you
 12 say that you:
 13 "... requested access to a copy of the design
 14 specification and all existing documentation for the
 15 EPOS system. I did this because it's the starting point
 16 of all engineering -- it sets out what you are trying to
 17 build. It is also important in managing and meeting the
 18 client's expectations and demands. Some of this
 19 documentation was located and I was given access to
 20 that, but it was totally out of date."
 21 You say that the specification is the starting
 22 point of engineering because it sets out what you're
 23 trying to build. What would a design specification look
 24 like?
 25 **A.** There's different levels of design specs. It will be
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1 a high-level design which was much more of a bridge
2 between the business and the technical development team,
3 and that would have more references in it to business
4 functionality, how to sell a dog licence or a stamp or
5 whatever, and how that translates into the counter
6 system.

7 Then below that you have maybe one, maybe more,
8 low-level designs which usually break out into
9 functional subject matter, which have a much more
10 in-depth specification of exactly how that module should
11 work, what data it should use, what interactions it
12 should have, which APIs it should use, et cetera,
13 et cetera. There may even be much lower-level
14 specifications underneath that if required.

15 **Q.** You say you were given access to some of the
16 documentation. Can you remember what documentation you
17 were given access to?

18 **A.** So, when I first got there, took a quick look round.
19 "Okay, where's the design specs? Let's go back to
20 basics and see what we're supposed to be developing.
21 What does the bridge we're supposed to be beginning look
22 like? Where's the design?"

23 I did manage to locate some of them and I believe
24 those were the re-engineered -- reverse engineered
25 documents that we referred to earlier. It certainly

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1 we are today, at that point.

2 Jumping in -- so to answer your question, jumping
3 in and progressing the rapid prototype is pretty much
4 the answer I told you earlier about taking the model and
5 turning it into the real thing.

6 **Q.** To use my analogy, the building on balsa wood?

7 **A.** Yes. Just to elaborate on that, the larger and more
8 complex integrations that a project such as that might
9 have, the more chance there are -- obviously increases
10 the chance of errors being made across interfaces and up
11 and down the software stack.

12 **Q.** You continue:

13 "The client ..."

14 That's Post Office; is that right?

15 **A.** Yes.

16 **Q.** "... was allowed to scope creep and retroactively add to
17 and change the requirements which was accommodated by
18 Steve Warwick."

19 What effect did that have on the development or
20 operation of the Horizon System?

21 **A.** Well, it's kind of several-fold really. First of all,
22 the business requirements were not clearly laid out,
23 which led to the fact that the high-level/low-level
24 designs were never properly produced against the
25 business requirement, and what you tend to find on

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1 wasn't a comprehensive set of documentation for the
2 counter, and it wasn't in a tiered architecture with a
3 high-level design, et cetera, which I would have
4 expected.

5 **Q.** What was the effect of the material that you were given
6 being out of date?

7 **A.** Well, it was worthless and irrelevant. The only purpose
8 it could possibly have served would be to satisfy an
9 audit at a high level, to say, "Are there design
10 documents in place, and have they been followed", and
11 somebody might have been using that as acceptance
12 criteria at a different level.

13 **Q.** Can we go forward to paragraph 18 of your witness
14 statement, please. You say:

15 "So far as I was aware, ICL Pathway had, in fact,
16 dived in and progressed the prototype into development
17 with no structures or process around it. This approach
18 is fatal in a large project with several integrations."

19 Why is the approach fatal in a large project with
20 several integrations?

21 **A.** So that was historical to before my time there. So I've
22 derived that comment from what people told me when
23 I arrived on site that, because the development was
24 quite well underway when arrived, they told me that that
25 was the historical nature of how they'd arrived at where

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1 projects where these things aren't in place is that the
2 client then has freedom to either change the initial
3 business request that they made, or morph it, or even
4 ask for extra functionality, and you end up in an
5 argument as to whether that was included in the first
6 request or whether it's a supplementary request.

7 Because these were being facilitated quite a lot
8 by Steve in his conversations with POCL, we were getting
9 development requests being shoehorned into the counter
10 team, right to the last minute, and an example of that
11 this one which I referred you to earlier about the --
12 which was the three-part papers which shoehorned -- the
13 software development was shoehorned in whilst the Task
14 Force was underway. So you get late requests, changing
15 requests, scope creep.

16 **Q.** Can we go forward, please, to paragraph 19 which is over
17 the page. You say, on completing your initial
18 assessment of the system, you concluded that:

19 "... 70 per cent of it could be saved, fixed and
20 tidied up, 20 per cent needed a lot more work but could
21 be kept, but that the critical Cash Account module was
22 beyond repair and must be rewritten. There was a layer
23 of design missing from the EPOS system which would
24 ensure only validated messages could be written to the
25 message store. There should have been an Application

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1 Programming Interface [that's the API that you referred
2 to a moment ago] between the code and the message store
3 which ensured that only correct and validated messages
4 could be written to the Riposte message store instead of
5 the freestyle that was currently allowed. The freestyle
6 was like having a graffiti wall instead of a library
7 with the Dewey system. Instead of each module reading
8 and writing messages to the message store in a freestyle
9 manner, they should only talk to thing Application
10 Programming Interface which would only accept and reply
11 to strictly controlled, documented and audited
12 read/write messages and it itself would read and write
13 the messages to and from the message store."

14 Is it right that that's what led you to the cash
15 account module being beyond repair?

- 16 **A.** Partly, yes. I mean, this is a much more fundamental
17 point regarding the design of the counter system. So
18 the Riposte message store and that message replication
19 system underneath worked quite well, and that did have
20 an API which was exposed to modules that were built on
21 top of it, to allow them to read and write messages to
22 the message store. An example of such a module might be
23 the cash account, for example, or, if somebody sells
24 a stamp, the reference data's read up and the messages
25 are the transaction that are written down.

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1 data inside the message, that module may not pick it up,
2 or it may read the wrong field, or it may accumulate
3 something incorrectly or it may miss the message
4 altogether.

5 So that standard compliance being missing could
6 lead to any outcome you care to imagine.

- 7 **Q.** What do you mean by any outcome you care to imagine?
8 **A.** Well, we used to see it all the time with certain
9 products. If you sold a particular product combined
10 with something else, for example, when the cash account
11 accumulated, sometimes that product sale, the
12 transaction was completely missing, because it didn't
13 recognise the message that the sale transaction had put
14 into the message store, or it may have got confused or
15 used a different product code or something. It could be
16 anything. It could manifest itself in any imaginable
17 way really.
18 **Q.** So the risk would be, if I took an example that you sold
19 six months' road tax, the subpostmaster would enter that
20 transaction on their counter and, because of the problem
21 that you identified here, that transaction would be
22 entirely absent?
23 **A.** It could be, or it could be -- yes, I mean, if someone's
24 gone in to fix a PinICL and they've introduced a new
25 message which slightly deviates from the other kind of

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1 Now, what we were saying here was that there
2 should have been an EPOS-specific API in between those
3 two which restricted read-and-write access to and from
4 the message store, and only allowed messages to be
5 written down to the Riposte API which conformed to --
6 the message contents conformed to the standards which
7 were defining in the data dictionary document.

8 What that would have done is controlled the
9 contents of the messages being written to the message
10 store, and prevented people writing stuff into it which
11 was not conformant to the agreed vocabulary or reference
12 data or anything else that was defined.

- 13 **Q.** What was the effect, if any, of not rewriting?
14 **A.** The fact that this was missing allowed the developers
15 a freestyle approach that, if they went into to add some
16 extra functionality or to fix a PinICL, they could all
17 of a sudden introduce a new message, a new message type,
18 to the message store to make life easy for themselves to
19 resolve the problem that they were trying to fix or code
20 that they were trying to implement.

21 Because they did not conform to any standard, if
22 another module came along that had to read that message
23 or depended upon the contents of that message in order
24 to maybe accumulate a correct cash account, for example,
25 if the original developer deviated from an agreed set of

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1 road tax or something like that, or he's typed something
2 in wrong or misunderstood it, then that particular
3 thread of transactions wouldn't be collected as part of
4 the accumulation.

- 5 **Q.** In my example it would be if in combination you sold six
6 months' road tax and bought a book of stamps?
7 **A.** Something like that, yes, yes.
8 **Q.** Can you remember now any hard examples of this?
9 I appreciate that's some ask ...
10 **A.** I can. I can't give you a hard, firm example, but this
11 used to happen. All the time. The common request that
12 was made during problem resolution say, for example,
13 model-office testing was underway and the test team
14 raised a bug, a PinICL, probably one of the first
15 requests -- you couldn't really do anything without
16 a copy of the message store. So the request would go to
17 Brian Orzell, "Please you get me the message store for
18 that particular period of time." The message store
19 would be provided back, and then it was a case of wading
20 through the tens of thousands of messages inside the
21 message store, to try and follow the thread of that
22 sales transaction, and then try to interpret why it
23 wasn't accumulated or why it was represented
24 incorrectly, and that was a very manual,
25 labour-intensive job that was also quite time critical

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1 because, if you didn't do it quickly, the message store
2 would move on rapidly, and you were unable to reproduce
3 the problem because the particular set of circumstances
4 under which that PinICL happened has disappeared now,
5 it's moved on. So that's why it was critical to have
6 a defined set of messages.

7 The other thing it speaks to as well is that there
8 were no diagnostic tools for the developers to be able
9 to dig into the message store and say, "Right, we sold
10 the car tax on Tuesday at 2 pm. Show me the thread of
11 transactions which resulted from the sale and show me
12 how they were accumulated into the cash account." That
13 diagnostic tool was missing.

14 **Q.** Did the absence of the Application Programming Interface
15 lead to a significant risk to the integrity of the
16 transactions undertaken by subpostmasters?

17 **A.** Absolutely it did. In my view, it was one of the
18 biggest shortfallings of the counter design. You had no
19 control whatsoever over what was getting written to the
20 message store. It was the code and the PinICL fixing
21 which decided -- it was coming down like confetti rather
22 than being channelled.

23 **Q.** Can we go forward to paragraph 21 of your statement,
24 please. You say:

25 "It was also possible for anyone to read and write
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1 the code that caused it.
2 **Q.** You have qualified 21, to the extent that it should read
3 anyone with the two permissions that you have mentioned.
4 How large a cohort of people would the "anyone" be, with
5 that qualification?
6 **A.** In practice I think it was usually Steve Warwick who
7 generated the message into a batch file, and that would
8 be released through the normal package-release system,
9 release-management system, and then that would be
10 dropped on to the counter as a piece of code and
11 executed as a batch file.

12 So it would be usually Steve that did that; maybe
13 Brian Orzell occasionally helped him.

14 **Q.** What about outside of the EPOSS team, because in the
15 next sentence you say:

16 "This was a technique used on occasion by the
17 support team ..."

18 **A.** So my understanding was, later on in the project when
19 I wasn't on the counter position, but I was led to
20 believe that that technique of correcting mis-balances
21 was being used by the support team, but that would have
22 come from somebody in the EPOSS counter team. They
23 would have constructed the command, wrapped it into
24 a batch file and passed it to the support team for them
25 to put through Tivoli as a code release to correct the

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1 anything into a message and post it to the message store
2 outside of the EPOS modules."

3 Can you explain what you mean by that.

4 **A.** Yes, I must qualify that by saying that you must have
5 two sets of permission to write to the message store.
6 The first is you must have the correct NT user
7 permissions and, secondly, within Riposte there was also
8 user permissioning as well. But, if you had those, it
9 was very straightforward to use a command-line interface
10 such as Riposte, put message or something with a text
11 string which had a message in it that you could use to
12 insert into the message store, and in fact that method
13 was used quite frequently to correct cash account
14 mis-balances. They would --

15 **Q.** Who is the "they" in that?

16 **A.** Well, we used to get it in a lot of the test
17 environments used to produce cash-account mis-balances,
18 and the fix was: if it's £2,000 over, you send a minus
19 £2,000 message into the message store, and it will
20 cancel it out, and that would allow the test cycle to
21 continue. So --

22 **Q.** Would that be without addressing the fundamental --

23 **A.** Well, that's --

24 **Q.** -- or underlying issue?

25 **A.** Correct, that's just fixing the message balancing, not
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1 error.

2 **Q.** Where did you get that understanding from?

3 **A.** Just from talking to the guys on the team.

4 **Q.** You say in and paragraph 22:

5 "I reported my conclusions to the following
6 people:

7 "Steve Warwick, who ducked and dived and swerved
8 the issue."

9 What do you mean by that?

10 **A.** Steve was very pro: "We've done everything right,
11 there's nothing wrong." He was in that camp. "The
12 code's in good enough condition to be able to Go Live."
13 So by then I was just making noise to all of these
14 people. They'd already decided that it wasn't going to
15 get wholly or partly rewritten, and that's an important
16 phrase which we should come to in a minute.

17 But Steve was firmly in the camp of:

18 We're not rewriting it; it's okay as it is.

19 Chris Humphries agreed. He could see the problem
20 and he did try very hard to effect change, but he was
21 under Terry Austin, and he didn't on his own have the
22 political sway to be able to persuade the higher
23 echelons to, you know, bite the bullet and rewrite the
24 cash account.

25 **Q.** So he actually refused, Mr Austin, for the cash account

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1 to be rewritten?

2 **A.** Yes, Terry Austin did. He disagreed with me and --

3 **Q.** You say that Gareth Jenkins denied the issues point

4 blank and ran off to hide in Bracknell and avoided

5 contact with the team. In what way did he deny the

6 issues?

7 **A.** Well, we managed to get Gareth down to the counter team

8 I think twice that I can recollect, and we tried to

9 engage him in the conversation about the missing API,

10 which he was very defensive of and said, "No, there's

11 nothing wrong with it as it is."

12 I also tried to engage him to get him to lend his

13 political design weight behind the argument that at

14 least the cash account should be rewritten, if not the

15 whole thing, and I was unable to get him to engage on

16 our side to lend his persuasive weight to persuade Terry

17 Austin to rewrite the cash account.

18 When we started having conversations like that,

19 that's when he kind of became evasive, certainly with

20 me. I was never able to get him to come back down on

21 site again after that.

22 **Q.** In the list of things that you thought needed to be

23 done, was total or partial rewrite of the cash account

24 at the top of it?

25 **A.** So that phrase that we've used in the document that Jan

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1 job that could potentially introduce more problems than

2 it would fix. This was not necessarily true and

3 indicates either a basic misunderstanding of how the

4 EPOSS system was built or even potentially suggests an

5 attempt to obfuscate the issue. The EPOSS system was

6 modular and what the other engineers and I were

7 proposing as an immediate action was a rewrite of ONLY

8 the cash account module. It would have been possible to

9 write a new, second version of this module alone leaving

10 all of the other code untouched."

11 Is that what you're referring to?

12 **A.** Yes. So what quickly happened was it was very clear

13 that they took this report, and part of their defence or

14 argument to reject the recommendations that we made was

15 to forget the first part of the sentence where we

16 recommended to rewrite it in part, referring to the cash

17 account, and they focused on "rewrite the EPOSS counter

18 system a whole", and every conversation that was had

19 after that, and certainly I heard in the testimonies,

20 were conflating the whole proposal to rewrite some of

21 the product into, "It's too big, it's far too dangerous,

22 it will introduce more problems", when in fact, if you

23 understood that it was built out of Lego bricks, you

24 could replace the Lego bricks one at a time starting

25 with the most critical, the most important, which

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1 and I authored, we recommended that it should be

2 rewritten in part or in whole. This is a key phrase

3 because, although it's not as clearly written in the

4 document as it could have or should have been maybe,

5 those conversations and emails were certainly taking

6 place within the project with the likes of Chris

7 Humphries, the test team, Terry Austin, everybody, that

8 "in part" meant we should at least rewrite the cash

9 account, because in my view this was primarily

10 a financial accounting system at the end of the day. If

11 the system blue-screened or you couldn't sell a stamp on

12 a Tuesday, or whatever it was, that's an inconvenience,

13 but at least financially it's correct.

14 So my recommendation and those of the senior

15 members which we spoke about earlier was the cash

16 account must be rewritten at least. That's the "in

17 part" part of that phrase.

18 **Q.** Was that in answer to my question at the top of your

19 list?

20 **A.** Yes, that was the number 1 thing that needed to be done.

21 **Q.** Can we go forward to paragraph 41, please, of your

22 witness statement which is on page 13. In paragraph 41,

23 you say:

24 "I have observed several witness testimonies

25 referring to the proposed 'rewrite' as a big deal, a big

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1 I would argue was the cash account.

2 Here, you could even -- because it was a batch

3 process that wasn't part of the counter client/customer

4 interaction, you could rewrite that as a separate module

5 and have it running as a shadow process on the counter.

6 You could run the cash account twice at the end of the

7 day or whenever, as a secondary confirmation, and use

8 the replacement module to check the validity of the

9 first one. Once you'd proved that it worked, you could

10 take the old one out and just continue with the new one.

11 This was not a large task. It was not something

12 that -- I couldn't understand why they didn't do it,

13 because it was such a -- it's not a small piece of work

14 but relatively small, and you could have done it without

15 introducing any danger to anything else on the counter.

16 **Q.** In terms of what happened then, can we turn, please, to

17 look at FUJ00121099. This is a new document disclosed

18 to us in the last day or so by Fujitsu. It's not one

19 you will be familiar with, sir.

20 I think you have seen this today in fact; is that

21 right?

22 **A.** Yes.

23 **Q.** We can see that it's a memorandum addressed to you and

24 others from Chris Humphries dated 12 March 1999,

25 entitled EPOSS Product Improvement Options. Having read

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1 the report or the memorandum, does this appear to be
 2 a response of a type, of a kind, to the EPOSS PinICL
 3 Task Force report?
 4 **A.** Yes. So one of the things that came out of the Task
 5 Force was, not just the report that we've seen today,
 6 but there was a further document which I think hasn't
 7 been found that had specific recommendations.
 8 **Q.** The recommendations document?
 9 **A.** I believe the items in this memo are lifted from that
 10 document. Basically the content is pretty much the
 11 same, the recommendations.
 12 **Q.** The recommendations document that we don't have, okay.
 13 **A.** Yes.
 14 **Q.** If we just go through it, please, this is a summary of
 15 discussions of workshops held on those two dates and
 16 includes some post 25 February '99, that is, workshop
 17 input from Les Ong? Who was he?
 18 **A.** Les Ong was one of the senior testers who was dedicated
 19 also dedicated to the Task Force initiative.
 20 **Q.** And then you will see Candidate Product Improvements
 21 Measures:
 22 "The following measures were identified as
 23 possible ways of improving the EPOSS product to enhance
 24 its maintainability and to reduce the risk of severe
 25 operational problems."

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1 call them first -- benefit:
 2 "The benefit of the implementing a particular
 3 improvement measure in terms of the product's enhanced
 4 maintainability (time/effort/risk), stability, and
 5 robustness."
 6 That's obviously a benefit. Secondly, a plus, the
 7 do nothing risk:
 8 "Risk that, if a particular improvement measure is
 9 not implemented, a severe software problem will arise in
 10 live operation that is difficult or impossible to manage
 11 and recover from. This could arise in the initially
 12 released system or from an error implementing
 13 a subsequent change to the software. There is also the
 14 risk that, due to poor maintainability, a business
 15 critical change could not be implemented within the
 16 required timescale."
 17 Then, if we go down to what I'm going to call the
 18 minuses, i.e. things that tend against doing any of the
 19 13 things:
 20 "Destabilisation Risk:
 21 "The risk that implementing a particular
 22 improvement measure will destabilise the product ...
 23 "Migration risk:
 24 "The risk that for a particular improvement
 25 measure the process of migrating in live service from

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1 Then there's a list of them if we just go down.
 2 I think we will find there are 13 of them. So this is
 3 a list of problems: "Stock unit dll" -- and you will see
 4 what the problem is, yes? "Reporting." Over the page
 5 number 3, "Attribute grammar". Number 4, which I will
 6 read out:
 7 "Cash account. Rewrite cash account report as a
 8 separate report. Bring it into line with the POCL view
 9 of the cash account and align the two reference data
 10 models. Possibly do the rewrite in C for performance."
 11 What does that last line mean?
 12 **A.** A lot of the stuff was written in Visual Basic, which
 13 was a lot heavier and slower. C is a language which is
 14 much more -- it gives a higher performance after it's
 15 been compiled and delivered on to the system.
 16 **Q.** 5, "Error Handling", 6, "Business Rule Validation", 7,
 17 "Logic Threads", 8, "Comments", 9, "Tidy Up Code", 10,
 18 "Modularise Code", 11, "Document [over the page 12]
 19 Error Messages", 13, "Menu Navigation".
 20 Then the document says:
 21 "Each of the above improvement measures was
 22 evaluated against the following set of criteria. The
 23 first two criteria tend in favour of implementing
 24 a measure and the remaining three tend against."
 25 So, if we look at the two pluses -- I'm going to

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1 the old to the new product embodying the measure will
 2 encounter unforeseen difficulties, leading to a position
 3 that is difficult or impossible to manage and recover
 4 from."
 5 Then over the page, the other negative minus is
 6 "The time effort and budget required to implement the
 7 measure".
 8 Then, in a matrix, the author has written "high",
 9 "medium" or "low" against each of those 13. That list
 10 on the left-hand side corresponds to the 13 issues we've
 11 mentioned, and addresses them against each of the five
 12 criteria: benefit, do nothing, destabilisation,
 13 migration, or cost.
 14 Can we just look at Cash Account. The benefit is
 15 said to be low, the do-nothing risk is said to be low,
 16 the destabilisation risk is said to be high, the
 17 migration risk is said to be high, and the cost is said
 18 to be high. Do you agree with those five evaluations?
 19 **A.** No.
 20 **Q.** Do you agree with any of them?
 21 **A.** On that highlighted line, when I first saw this document
 22 this morning, my initial impression was that I'd got my
 23 understanding of positive and negative the wrong way
 24 round because they are inverse to what I would have
 25 said.

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1 Q. The benefit would have been high, the do-nothing risk
2 would have been high --
3 A. Yes.
4 Q. -- the destabilisation, migration and cost risk should
5 be low?
6 A. Yes.
7 Q. They should all be the other way round?
8 A. Yes.
9 Q. Moving down the page, there's then a score essentially
10 given to each of the evaluation of high, medium and low
11 and, if you look, that explanation is at the foot of the
12 page. If we go over the page, please, applying those
13 weightings to the scores, if we highlight Cash Account,
14 the benefit has been scored at three, consistent with
15 high; the do-nothing risk 3 also, but then three minus
16 6s for destabilisation, migration and cost, leading to
17 a grand total of minus 12.
18 Then, if you go to the table underneath -- just
19 scroll down a little bit -- the ranking of whether or
20 not to do any of those things is set out in a rank, and
21 rewriting the cash account comes out as bottom. Do you
22 agree with that assessment and approach?
23 A. I don't understand it. It's upside down. I've no idea
24 how you could ever come up with such a ridiculous
25 scoring system and end up with the cash account being at

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1 the problem and he was always very supportive in trying
2 to effect change, to a degree. Why this has happened at
3 that stage in time, I can't imagine. I have my
4 suspicions, but I should probably not ...
5 Q. Can you help us with that.
6 A. I think the project by then had -- shortly after the
7 cash account -- sorry, the Task Force initiative and the
8 subsequent recommendations that came out and the noise
9 around it, there was a very definite project push to get
10 the lid back on to that tin of worms and move on with
11 acceptance in a positive way, and that did not include
12 rewriting any of the code, as evidenced by this
13 recommendation here.
14 So I think -- how -- any dissenting voices were
15 either sidelined or moved or ignored, and this was the
16 narrative to move on through the acceptance process. So
17 it doesn't surprise me that documents like this were
18 created but, you know, as to why, I can only imagine.
19 Q. Can I just unpick that a little bit so I understand it.
20 You're saying that it doesn't surprise you that
21 a document like this was written, because at this stage
22 of the process the prevailing narrative was to move on,
23 get the project rolled out and, therefore, rewriting the
24 cash account was not on the cards, and you couldn't
25 write a document that said, "We need to rewrite the cash

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1 the bottom by quite a margin, yet you're talking about
2 a financial accounting system that clearly doesn't work.
3 It's beyond me.
4 Q. At this stage in the process -- we're dealing at
5 March 1999 -- where was the EPOSS project in terms of
6 its ability to get any change done?
7 A. In terms of change, are you referring to bug fixing or
8 additional functionality?
9 Q. Both, if you take them in stages, please.
10 A. I wasn't on the counter team by then, but I believe that
11 they had improved certain things to a degree. They
12 started to put better practices in place and things like
13 that. It was a little bit more disciplined.
14 I think they had implemented some of the new
15 functionality in a better way than they had
16 historically. But the fact that they are left with
17 a legacy code and all of the associated problems inside
18 it just meant that it wasn't going to be a different
19 outcome.
20 Q. Can you help explain how it was that Chris Humphries,
21 who you have referred to in relatively positive terms in
22 your evidence so far, came to write a document such as
23 this?
24 A. I can't. I was surprised when I saw it because, exactly
25 as you've said, Chris was always very -- he understood

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1 account"?
2 A. Correct.
3 Q. Can we go over the page, please. The second workshop
4 discussion, which I think we saw from the earlier in the
5 report was 9 March 1999, includes the table would be now
6 put into order of doability --
7 A. Mm-hm.
8 Q. -- with cash accounts still being bottom, and adds some
9 narrative in the right-hand column, and you can quickly
10 look down them:
11 "Error messages. Desirable but not a measure to
12 enhance the product maintainability and robustness.
13 "Stock unit dll. Too much effort to do all at
14 once.
15 "Attribute grammar. Most of the benefit comes
16 from the documentation. Redundant attributes is
17 desirable for space saving, but does not add much
18 towards maintainability ...
19 "Reporting. More beneficial than Stock unit, but
20 also needs prior design before decision can be made as
21 to what to do in this release ...
22 "Document. Should be undertaken as models are
23 open for development work. Waste of time documenting
24 existing stock unit ...
25 "Logic threads. Too risky.

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1 "Comments. Implement as modules are opened up for
2 development.
3 "Tidy-up code. Removal of obsolete code too
4 risky.
5 "Modularise code. Not worth it.
6 "Error handling. Implement high-level trapping
7 immediately and detail error trapping as modules are
8 opened for development work.
9 "Menu navigation. No.
10 "Business rule validation. No.
11 "Cash account. No."
12 Does that narrative reflect the view that you have
13 just described?
14 **A.** Yes, I would say so. It's -- I would disagree with most
15 of the conclusions there.
16 **Q.** You were, I think, an addressee of this memorandum?
17 **A.** Mm-hm.
18 **Q.** I think that reflects the fact that you were present at
19 one or both of those two workshops?
20 **A.** I don't -- and I stand to be corrected if I was --
21 I don't recall being at those workshops. I think I may
22 have been copied, because some of the potential outcomes
23 may have affected the project I was working on at the
24 time, which was APS, but also the fact --
25 **Q.** Sorry to stop you there, to interrupt you. Had you been

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1 spoke to Terry after that again. We never really had
2 any interaction.
3 Very shortly after that meeting, he appointed Phil
4 Hemmingway, who was working in the EPOSS counter team
5 for me as business analyst at the time.
6 **Q.** He was under you?
7 **A.** Yes, and he appointed Phil Hemmingway as the development
8 lead on that team at that point, and I was moved off on
9 to another team, the LFS counter development team, which
10 was new piece of software they needed developing.
11 **Q.** So you think you probably didn't attend in February '99
12 and March '99?
13 **A.** I think I was already off on the LFS counter team by
14 then.
15 **Q.** Do you know why you were copied into a memorandum such
16 as this?
17 **A.** No idea, sorry.
18 **Q.** Did it have anything to do with the work that you were
19 currently doing?
20 **A.** It's certainly nothing to do with Logistics Feeder
21 Service, which is where I was working at the time.
22 I can only think that it was as a result of the fact
23 that this document is based largely on the
24 recommendations that Jan and myself and Martin Smith and
25 a couple of the guys made as part of the Task Force; so

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1 moved on by now?
2 **A.** Yes.
3 **Q.** Why were you moved on?
4 **A.** Wrong-answer syndrome. At the end of the Task Force
5 initiative, Jan and I had written the audit document.
6 Certain recommendations were made. Obviously the cash
7 account rewrite was a major part of that, and then at
8 that point, shortly after that, Terry Austin decided to
9 have a reorganisation of some of the teams, the EPOSS
10 counter team being one of them. As part of that, I was
11 called into his office and asked you -- he said, "I'd
12 like you to take over officially and formally from Steve
13 Warwick who will be moving on to the business liaison",
14 or something similar, "and I want you to be the
15 development manager of the EPOSS counter team." This,
16 that and the other, "You can have the following
17 resources", et cetera, et cetera. "Okay, fine."
18 I said to him at that point I would accept the
19 position on the condition that we rewrite the cash
20 account, and at that point Terry was frustrated, to say
21 the least. He wasn't very happy with me putting
22 a condition on that acceptance. It was clear that the
23 cash account wasn't going to get written. That
24 conversation was very quickly brought to a halt, and
25 I was ushered out of the office, and I never really

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1 those recommendations that are in the previous pages are
2 probably lifted from that document, and he might have
3 been copying me in as a courtesy. I don't know.
4 **Q.** So this didn't have anything to do with your current
5 work. Can you now recall doing anything as a result of
6 the receipt of it?
7 **A.** I don't remember even seeing it, to be honest, at the
8 time. I do recognise the document now that you've shown
9 it me, but I have no recollection what happened around
10 it or what result it had.
11 I think by then everyone had just given up trying
12 to argue with the narrative.
13 **Q.** If we go down to the Conclusion then, please:
14 "Design activity will be undertaken to design the
15 product improvement implementations for Stock Unit and
16 Reporting."
17 I think that's two of the 13 things:
18 "It will then be decided what development can be
19 achieved with Release 2+ timescales. This work will be
20 scheduled."
21 I think that's the end of it. Can we move
22 forwards in time, please --
23 **SIR WYN WILLIAMS:** Before we do that, Mr Beer, as you
24 rightly point out, I hadn't seen this document before.
25 Given that, I'm very grateful we have seen it now, but,

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1 Mr Whittam, I would like a written explanation as to why
 2 it is that this document appears the night before this
 3 witness gives evidence, given that we have been debating
 4 matters around the EPOSS Task Force for weeks.

5 **MR WHITTAM:** Certainly. It was in the correspondence that
 6 came with it.

7 **SIR WYN WILLIAMS:** All right. I will read that and then
 8 I will decide whether I want any more. Thanks.

9 **MR BEER:** Can we turn, please, to FUJ00079782. This is an
 10 audit report of 28 October 1999. You are neither an
 11 author nor an addressee and, therefore, I don't think
 12 you would have seen this at the time. Can you look at
 13 just the abstract. You have seen this document before
 14 as part of preparation for giving evidence, a report of:
 15 "An audit of the CSR+ development activities and
 16 presents a snapshot view during September 1999. It
 17 details the results of the investigation and provides an
 18 opinion as to the state of process compliance and
 19 capability."

20 Then, if we can move forward, please, to pages 19
 21 and 20, there's a description of EPOSS.

22 "From the CSR+ perspective, the development of the
 23 EPOSS product has been successful with software drops
 24 being made according to the planned schedules and
 25 confidence in the team that future drops will ... be

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1 "In particular, the maintainability, resilience
 2 and potential for change aspects must be subject to
 3 doubt. The report also identified many instances of
 4 poor programming technique and application of coding
 5 standards and, while CSR+ changes have been reviewed by
 6 the Team Leader no attempts have been made to address
 7 the significant body of code not affected. There's also
 8 anecdotal evidence that EPOSS components used by other
 9 applications are fragile and cause problems for the
 10 calling application, Print Server was mentioned by both
 11 LFS and APS counter teams."

12 Then if we go over the page, please --

13 **A.** There's quite a lot in that paragraph alone that is
 14 indicative of the fact that, first of all, the number of
 15 PinICLs being raised isn't diminishing and the problems
 16 persist. Sorry, could you just go back up to the page
 17 before.

18 **Q.** Absolutely, yes. One page back please, Frankie.

19 **A.** So they are still suffering from the same problems of
 20 having to introduce so many PinICL fixes or additional
 21 code, maintainability and resilience is a problem.

22 **Q.** This is remember late October '99?

23 **A.** This is over a year later and they are still suffering
 24 from the same issues, poor programming techniques,
 25 application coding standards are missing. Okay, so the

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1 achieved on time.

2 "Unfortunately EPOSS continues to be resource
 3 hungry in dealing with live problems associated with CSR
 4 and in ensuring that these fixes are brought forward and
 5 incorporated into the CSR+ product.

6 "The EPOSS Task Force report --"

7 And that's footnote 6 which takes you back to that
 8 list of associated documents that I showed you right at
 9 the beginning of giving your evidence. It is
 10 a reference back to what's described as version 0.3 of
 11 the PinICL Task Force report dated 29 September 1998:

12 "The EPOSS Task Force report raised the question
 13 of the maintainability and resilience of the EPOSS code
 14 following the 6 week PinICL blitz where some 550 PinICLs
 15 were processed. Since then a further 996 PinICLs have
 16 been raised ... and these can only have had
 17 a detrimental effect on the quality of the code."

18 What do you think reading that?

19 **A.** Sorry?

20 **Q.** What do you think, reading that, seeing that?

21 **A.** It's everything we said in the Task Force. I mean, the
 22 statistics, the volume of PinICLs alone tell the story.
 23 It's an accurate, a very accurate description of where
 24 we were at the time.

25 **Q.** The authors continue:

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1 last part of the paragraph where it's referring to Print
 2 Server. So by then I was off on the LFS counter
 3 development team, and my peer on the APS team was also
 4 experiencing the same problems that, when we built
 5 a separate part of the counter position which had to
 6 talk to the EPOSS counter and use the print server,
 7 which was part of the EPOSS counter, nothing was working
 8 as it should, and that's evident, that not just the LFS
 9 team that I was running but also the APS team upstairs
 10 was experiencing the same problem. In fact, that print
 11 server became quite a bit of an issue.

12 **Q.** If we scroll down, I maybe jumped too quickly to the
 13 next page. There's an analysis month by month of
 14 PinICLs raised, I think, for EPOSS and desktop, and then
 15 EPOSS on its own. If you go over the page, please, you,
 16 can see that the numbers don't change substantially?

17 **A.** So that table in itself tells you exactly what we were
 18 referring to earlier, that you would expect to see the
 19 number of issues diminish over time as the quality
 20 improved and, in fact, there it's almost becoming worse.

21 **Q.** And then the narrative of the report says:

22 "The figures indicate that the problems facing
 23 EPOSS during the Task Force period have not diminished."
 24 I think that's exactly what you said.

25 **A.** That's exactly it. So there's a comment about this CSR+

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1 release, which was a big bone of contention at the time,
2 that at the end of the Task Force they were given the
3 report that we co-authored detailing what the senior
4 engineers, senior auditing guy, and all of the
5 experienced people around the project were saying,
6 detailing the problems.

7 It's like the captain of the ship's been told that
8 there's a hole in the boat and it's filling with water
9 by the engineers. Instead of fixing the hole, what they
10 did was they went away and constructed this CSR+
11 release, which is akin to painting a plimsoll line on
12 the outside of the boat so that they could measure how
13 fast it was sinking.

14 The whole context of this CSR+ release was about
15 being able to detect discrepancies between the counter
16 and the middle and back office, the APS systems and
17 such, and highlight where there was a difference between
18 the number of transactions or the balance between the
19 two being different.

20 That's just building a dipstick instead of
21 actually fixing the hole in the boat. They spent
22 a year, an inordinate amount of time and resource, on
23 this release instead of fixing the problem.

24 Q. The authors continue:
25 "Of greater concern are the non-EPOSS PinICLs
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1 is that right?

2 A. No.

3 Q. Would you have had access to it?

4 A. No.

5 Q. In which case I'm not going to ask you questions about
6 it.

7 A. I can just comment on what this paragraph:

8 "These issues have come to light when comparing
9 a TIP derived cash account with the electronic cash
10 account sent by Pathway."

11 So this is a direct result of them measuring the
12 difference between the two areas. So that's detected
13 a difference between the counter and the back office.
14 So that's what this is alluding to.

15 Q. Maybe then if we look that next page, page 58:

16 "Pathway has analysed all occurrences of where the
17 TIP derived cash account does not equal the actual cash
18 account. There is no suggestion or indication that
19 there is a fault in the calculation or reporting of the
20 cash account. The incidents relate to an occasional
21 missing transaction when reporting to TIP. This rate of
22 occurrence is around 1 per cent of outlets per week."

23 You had obviously been advocating the rewriting of
24 the cash account in autumn '98. We're now here; this
25 was July '99. What would your view be as to whether or
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1 within the group suggesting that there are still serious
2 quality problems in this vital, customer-facing element
3 of the system."

4 Then in the box in italics:

5 "The EPOSS solutions report made specific
6 recommendations to consider the redesign and rewrite of
7 EPOSS, in part or in whole, to address the then known
8 shortcomings. In light of the continued evidence of
9 poor product quality these recommendations should be
10 reconsidered."

11 You're shaking your head. Why is that?

12 A. Well, there it is again. This is a year later, and Jan
13 Holmes has even got a box around it trying to emphasise
14 the fact that this decision should be revisited. It's
15 quite evident here that the quality of the product
16 a year later is no better, if not worse, than they
17 thought it was a year ago.

18 Q. Just to remind ourselves, on the distribution list was
19 John Bennett, Mike Coombs, Terry Austin and Martyn
20 Bennett of this report. Can we just look at two other
21 documents, please, briefly. The first POL00043691.
22 Look at page 57, please. This is an AI for 376 which
23 you know about, I think.

24 A. Yes, I've seen this document, yes.

25 Q. I don't think you would have been copied in at the time;
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1 not the problems referred to in this AI were related to
2 the problems in the EPOSS code, or can't you tell?

3 A. I think it's highly likely. I don't think they know
4 what the problem is, reading that. We saw this stuff
5 all the time, and it's no surprise to see it there at
6 this time and date. How they've based that conclusion
7 that it's TIP -- well, how can the derived cash
8 account ... There's no suggestion or indication that
9 there is a fault in the calculation, but there's
10 a transaction missing. How does that work?

11 Q. Let me turn lastly to FUJ00079783 and turn to page 6 of
12 this document, please. Back a page. Forward a page,
13 please. Thank you.

14 Now, we don't as an Inquiry have emails or many
15 emails dating from this time at all, but we do benefit
16 from having the content of an email being cut into, cut
17 and paste it seems, into this other document which we do
18 have, and you will see on the left-hand side a report of
19 an observation or recommendation, being:

20 "The audit identified that EPOSS continues to be
21 unstable."

22 This is now November '99.

23 "... EPOSS continues to be unstable. PinICL
24 evidence illustrated that the number of PinICLs raised
25 since the '98 Task Force and the rate of their being
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1 raised.
 2 The EPOSS solutions report made specific
 3 recommendations to consider the redesign and rewrite of
 4 EPOSS, in part or in whole, to address the then known
 5 shortcomings. In light of the continued evidence of
 6 poor product quality these recommendations should be
 7 reconsidered."

8 We've seen that.

9 Then the response, 25 November, an email issued by
 10 TPA, which I understand to be Terry Austin:

11 "We have not formally closed down the
 12 recommendation that we re-engineer the EPOSS application
 13 due to its inherent instability. Since this
 14 recommendation was made, a number of events/actions have
 15 occurred. We've embarked on a major maintenance
 16 exercise for LT2 which targeted several known stability
 17 issues. In parallel, we carried at a defensive testing
 18 activity which identified a number of faults which were
 19 addressed. The intensive exercise designed to remove
 20 Acceptance Incident 298 resulted in many substantial
 21 improvements to the error handling messaging and
 22 printing aspects of the product. We finally introduced
 23 improved unit and link testing and more disciplined
 24 configuration control. Finally, the maintainability and
 25 enhanceability of the product has been proven by the

1 "I witnessed the liaison between representatives
 2 of POCL and ICL Pathway during the design and
 3 development of the ... system daily, between Steve
 4 Warwick and a POCL lady. The discourse and interaction
 5 was always very good. POCL had a presence in the
 6 building and POCL and ICL Pathway met almost daily.
 7 I attended some of those meetings. I understood that
 8 the POCL rep, Barbara Longley, was in attendance and
 9 Steve Warwick mostly from ICL Pathway."

10 Then over the page, please, in the paragraph that
 11 you have just given in paragraph 51, were you saying
 12 that by those means POCL knew about the serious problems
 13 with the EPOSS, and particularly the cash account module
 14 within it?

15 **A.** I think it would be difficult to have been in the
 16 building and not be aware of the problems that the EPOS
 17 counter system was experiencing. I also think it will
 18 be difficult to be in the building without being aware
 19 of the number of PinICLs that were being raised, and
 20 I know that's a subjective answer, but I think it will
 21 be difficult to argue that you're in the building but
 22 you're not aware.

23 Now, having said that, Steve did do a great job at
 24 managing the client and fielding all of the problems,
 25 and he was a great salesman in that respect. So it

1 speed and quality of the SIP 16 and EPOSS reconciliation
 2 developments.

3 "We will of course continue to monitored the
 4 PinICL stack for the next few months and if necessary
 5 reevaluate this decision. Would Jan please close this
 6 issue formally using the rationale described."

7 What do you understand that answer to mean?

8 **A.** So this is obviously one of the critical elements for
 9 POCL accepting the product, and he's started the
 10 explanation there with his first sentence, that they
 11 haven't ruled it out, even though it's a year later and
 12 the PinICL statistics tend to suggest that the product's
 13 worse, not better, yet concludes with a final sentence
 14 of asking Jan to close it, based on a logic which is:
 15 we've done lots of things, remedial work, code
 16 improvement, et cetera, et cetera but those improvements
 17 are not reflected in the PinICL statistics. So how, if
 18 you were the client POCL, or -- how could you accept
 19 that as an argument, unless you didn't have visibility
 20 of the PinICL statistics, I don't know.

21 **Q.** Can we just turn then lastly to POCL's knowledge and
 22 turn up paragraph 51 of your witness statement,
 23 WITN00620100 at page 17.

24 I should start actually with paragraph 51 on the
 25 previous page. You say:

1 could be also equally arguable that they were kept in
 2 the dark to a certain degree.

3 Now, when I refer to the fact that they definitely
 4 knew that cash account was broken, I'm talking about the
 5 PinICL which I think is referred to that bottom of
 6 paragraph 52, where it has a full audit trail of
 7 everybody who read, touched and commented on that
 8 particular cash account error, and there are at least
 9 one POCL person -- I think that was Barbara Longley --
 10 whose desk that PinICL did cross, and she has commented
 11 on it at some point.

12 So that speaks specifically to that one PinICL.
 13 Whether you could argue that that gave them an awareness
 14 of all the problems, I don't know, but I think it would
 15 be difficult not to.

16 **Q.** Let's just quickly then look at that PinICL FUJ00067416.
 17 Just before we dive into the detail, is your
 18 understanding that the peak incident management system
 19 was an internal ICL system?

20 **A.** I was under the impression -- I may be wrong -- that the
 21 peak incidents came from -- I'm not sure if it was the
 22 support people but that was POCL-facing. So when POCL
 23 raised an issue, it was a peak incident. When that was
 24 fed into the ICL PinICL system, that was the PinICL
 25 system.

1 Q. The call logger on the top right-hand side is shown as
 2 EDSC. Was that the European development and support
 3 centre at ICL?
 4 A. I don't know what that stands for.
 5 Q. Let's look then at the first box in the progress
 6 narrative against the date of 16 May, three lines in:
 7 "The host-generated cash account line comparisons
 8 report dated 15 May where Post Office 169207 has
 9 a difference in the receipt and payments total for Cash
 10 Accounting Period 06. Please investigate."
 11 Would you agree that that suggests that the issue
 12 had arisen with Post Office branch 169207?
 13 A. Yes.
 14 Q. So would that be the customer who had raised the issue
 15 with the EDSC?
 16 A. Yes. In fact, it is logged as a call log or customer
 17 call; so that would indicate it's come from a customer.
 18 Q. So POCL had an involvement to the extent that
 19 a subpostmaster or a person in that branch raised the
 20 issue initially?
 21 A. Yes.
 22 Q. I'm more interested in whether POCL design development
 23 people, whether co-located or not with ICL, would have
 24 sight of or visibility of this document. Can you help
 25 us on that?

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1 (2.00 pm)
 2 **JAN ROBERT HOLMES (sworn)**
 3 **Questioned by MR BLAKE**
 4 **MR BLAKE:** Thank you very much. Can you give your full name
 5 please.
 6 A. Yes, it's Jan Robert Holmes.
 7 Q. Mr Holmes, you should have in front of you a hard copy
 8 of a witness statement.
 9 A. Yes.
 10 Q. And is that dated 3 September of this year?
 11 A. Yes, it is.
 12 Q. Could I ask you to turn to page 18, please. Is that
 13 your signature that bottom?
 14 A. Yes, it is.
 15 Q. Is that statement true to the best of your knowledge and
 16 belief?
 17 A. Yes, it is.
 18 Q. Thank you for coming today. As you are aware, I'm
 19 asking questions on behalf of the Inquiry. I'm going to
 20 start by asking just about yourself. You began your
 21 career in the Civil Service; is that right?
 22 A. Yes, that's correct. In the mid-'70s I started
 23 programming and did some work programming operations
 24 management and then moved into computer audit in the
 25 early '80s.

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1 A. Well, they certainly would because it's -- this is out
 2 in the POCL estate and it's them who's raised the call.
 3 I was under the understanding that Barbara Longley,
 4 who's in the second box down there, was a POCL person.
 5 I may be wrong; I thought she was. This has come from
 6 the POCL estate and it's gone through right from the
 7 customer through first line support.
 8 Q. So it's Barbara Longley's user identification on this
 9 peak that causes you to say that POCL knew that there
 10 were problems with the EPOSS system?
 11 A. Yes.
 12 **MR BEER:** Yes, thank you very much. They are the only
 13 questions that I ask. There may be questions from
 14 others.
 15 **SIR WYN WILLIAMS:** Anyone? No. I think that's it, Mr Beer,
 16 and your prediction was very precise.
 17 Thank you, Mr McDonnell, for coming to give your
 18 oral evidence. Thank you too for making your written
 19 statement. I'm very grateful. 2.00 or do you need to
 20 start at 5 to?
 21 **MR BEER:** That's all down to Mr Blake.
 22 **MR BLAKE:** 2.00's fine.
 23 **SIR WYN WILLIAMS:** 2.00.
 24 (12.53 pm)

(Luncheon Adjournment)

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1 Q. I think you worked for a few small IT companies for a
 2 period?
 3 A. Subsequently, to that, yes.
 4 Q. Then in 1995 you joined ICL Financial Services Division
 5 in Wilmslow; is that right?
 6 A. Yes, that's correct.
 7 Q. In 1997 you transferred to ICL Pathway in the role that
 8 we're going to hear about, as audit manager.
 9 A. Well, this is where I have to divert from here a bit.
 10 I actually realised that I joined late 1996 in
 11 a slightly different capacity, but it didn't go for very
 12 long, and then I was transferred into this role as audit
 13 manager in 1970 (*sic*). So that first bit can be
 14 discounted, I think.
 15 Q. Do you remember what the 1996 post was at all?
 16 A. Yes, it was process engineer, I think.
 17 Q. Thank you. Then you left that role briefly, the audit
 18 manager role, and I think you then came back and
 19 returned to the role?
 20 A. Yes, in May 1970 (*sic*) I left to join a central ICL
 21 project calling Propel which collapsed in the middle of
 22 2001 -- nothing to do with me but -- and then I came
 23 back to the programme until about 2008 when I left.
 24 Q. Sorry, when did you leave?
 25 A. I think it was about May 2000.

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1 Q. 2000, thank you. You retired in 2008; is that right?
 2 A. No, I didn't retire. I left the program and then was
 3 made redundant the following year, and then did some
 4 sort of consultancy work until I finished work about
 5 2015.
 6 Q. Thank you very much. Just as a matter of transparency,
 7 in preparing for this Inquiry, I think you confirm with
 8 me you that you had spoken to Terry Austin?
 9 A. Yes. I mean, I have to. I've known Terry since we
 10 started in the Civil Service because we were in it at
 11 the same time. So I know him as a friend as well as a
 12 work colleague and, in fact, it was Terry who steered me
 13 into Pathway in '96/97.
 14 Q. I think you may have spoken to one or two other people;
 15 is that right?
 16 A. Yes, I did, but nobody who was involved with this.
 17 Q. Thank you. When you began your role as audit manager,
 18 you have described the audit function as being immature.
 19 What do you mean by that?
 20 A. To all intents and purposes, it was a standing start.
 21 What happened was, when I came in as process engineer,
 22 I was doing that kind of work, and then it became clear
 23 that, because of the volume of audit information and
 24 data that was going to be collected, and what was
 25 expected of it through the requirements, that there was

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1 Q. Yes.
 2 A. John Bennett ran it, Liam Foley was the Business
 3 Development Director, Tony Oppenheim the Financial
 4 Director, Terry Austin, I think at the time was on the
 5 board as the Program Director. I think there was an HR
 6 guy as well, John Hobson.
 7 Q. Were you aware of how it worked, that senior management
 8 team? Did it have regular meetings for example?
 9 A. I believe so, yes.
 10 Q. Did you attend any of those meetings?
 11 A. No.
 12 Q. Do you feel that you had enough support in your position
 13 from the board or from the senior management?
 14 A. Yes, I do. It's not often when you set up an audit
 15 department that you get the level of support that you
 16 want. You often have to fight your corner to get heard
 17 and listened to and taken seriously. But I have to say
 18 that on this account, this project, it was pretty good.
 19 Visibility was good to the senior management team
 20 through reports and corrective actions. Martyn was
 21 quite vociferous in supporting the role in his position
 22 as my boss.
 23 So I was quite comfortable with it compared to
 24 some I'd been in where, you know, internal audit was the
 25 unfortunate noise in the corner.

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1 a need to take a more active management role in it.
 2 Also the fact that, because I had been through the
 3 Institute of Internal Auditors training, along with
 4 a whole raft of other civil servants -- it was the
 5 result of a National Audit Office initiative -- it meant
 6 that there was consistency in approach between what
 7 I would be doing and what the Post Office and Benefits
 8 Agency will be doing as well, the idea being that we
 9 could work a bit more harmoniously because we had the
 10 same expectations of standards and practice and what
 11 have you.

12 In terms of the audit function with regard to the
 13 data and the trails, yes, that was a standing start
 14 because they were just being developed and, in terms of
 15 the internal audit side, that was a new function that
 16 I was asked to put in place to interface and work with
 17 Benefits Agency and the Post Office.

18 Q. Thank you. The broader team that your role fell into,
 19 that was the Quality and Risk Management Group; is that
 20 right?
 21 A. Yes, that's correct, under Martyn Bennett, who was on
 22 the senior management team.
 23 Q. Do you remember who else was on the senior management
 24 team?
 25 A. The senior management team?

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1 Q. At paragraph 14 of your witness statement, you have
 2 listed three audits that you consider that are most
 3 important to the Inquiry. There's no need to go to it
 4 in the statement unless you would like to.
 5 A. Yes.
 6 Q. You describe the CSR+ development audit, the EPOSS Task
 7 Force report, and the implementation audit. I'm going
 8 to take them in chronological order, just to remind
 9 ourselves of what each one of those are, although we
 10 have heard quite a bit already this morning.
 11 Can we look at a FUJ00080690. That this EPOSS
 12 PinICL Task Force report that we have seen a lot about
 13 this morning, and it talks about the Task Force carrying
 14 out its work in the summer and autumn of 1998.
 15 A. Yes.
 16 Q. I'm going to ask you shortly about the various dates of
 17 the reports, but perhaps we can just turn to page 7 for
 18 this purpose just to remind us of what it says. There's
 19 a key section there about the EPOSS code, and it
 20 highlights code decay through fixes, for example,
 21 PinICLs likely to increase, and poor workmanship. Do
 22 you agree with that? Is that a fair summary of what it
 23 says there?
 24 A. Yes.
 25 Q. Was that something you agreed with at the time? I mean,

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1 you wrote the report. Presumably that was your view.
 2 **A.** Yes. I mean, just to put these things in context,
 3 though just for a minute, audit reports are by virtue of
 4 their nature snapshots in time, okay? So, when you go
 5 in to do an audit, you go in and look at the evidence as
 6 it is over that one-or-two-week period that you're doing
 7 the work. You then take that away, you sit and look at
 8 it and think about it, have conversations with other
 9 people, and then you draw conclusions, and you ask
 10 yourself: if this were to continue, what could go wrong?
 11 That's when you start putting forward the scenarios of
 12 code decay and problems coming up in the future.

13 You are trying to contextualise what you've found
 14 into what potentially could happen if this was allowed
 15 to go on. So, yes, code decay could easily become an
 16 issue, but I'm not in a position to say in 1998 what
 17 that issue might be in the long-term.

18 **Q.** But you're looking forward there, predicting likely
 19 future problems?

20 **A.** Yes, in that context I am, yes.

21 **Q.** Then we'll look at the CSR+ audit. That's FUJ00079782,
 22 please. I should say that the first one I think was
 23 distributed to a similar distribution list, Martyn
 24 Bennett being your manager?

25 **A.** Yes.

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1 reconsidered."

2 Can you tell us: do you remember what the EPOSS
 3 solutions report was?

4 **A.** No, unfortunately this is a lost document. I can't find
 5 it in my own personal archive, and it looks like you
 6 haven't been able to find it either. But it was written
 7 as a follow-up to the Task Force report. I'm almost
 8 certain Dave McDonnell wrote it as a technical report,
 9 opposed to an audit report but I just don't know what
 10 happened to it, where it's gone.

11 **Q.** We have a note of it being dated 21 September 1999.

12 **A.** Mm-hm.

13 **Q.** Does that fit with your recollection?

14 **A.** What, of the solutions report?

15 **Q.** Yes.

16 **A.** Quite possibly.

17 **Q.** Do you remember in broad terms what it may have said?

18 **A.** No. I think it may well have just gone into more
 19 technical detail about what we found in the EPOSS
 20 report, what we reported in a sort of more general
 21 managerial-type sense, as opposed to a deep technical
 22 sense.

23 You have got to bear in mind I'm not a technician.
 24 So the bits in that report and the EPOSS Task Force
 25 report that were technical, I had to get contributions

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1 **Q.** I think he received all of these reports, but we can
 2 have a look at that. This was the summer and autumn
 3 '99. We've looked at this already this morning, but
 4 let's look at page 20, please. This paragraph we looked
 5 at just shortly before lunch says:

6 "The figures indicate that the problems facing
 7 EPOSS during the Task Force period have not diminished.
 8 Of greater concern are the non-EPOSS PinICLs within the
 9 group suggesting that there are still serious quality
 10 problems in this vital, customer facing element of the
 11 system."

12 So I think you have just said that, in relation to
 13 the report of the Task Force, you were making some
 14 predictions or looking to likely future events.

15 **A.** Yes.

16 **Q.** This is somewhat later, and it looks as though those
 17 events have been realised.

18 **A.** Correct, and that's supported by the evidence in the
 19 table that sits above it.

20 **Q.** Then it goes on and says:

21 "The EPOSS Solutions Report made specific
 22 recommendations to consider the redesign and rewrite of
 23 EPOSS, in part or in whole, to address the then known
 24 shortcomings. In light of the continued evidence of
 25 poor product quality, these recommendations should be

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1 from people like Dave.

2 **Q.** We've seen in the EPOSS PinICL Task Force reports some
 3 pretty frank language there. For example:

4 "Whoever wrote this code clearly has no
 5 understanding of elementary mathematics or the most
 6 basic rules of programming."

7 **A.** Yes.

8 **Q.** Is the EPOSS solutions report likely to have addressed
 9 that at a more technical level?

10 **A.** Quite possibly, yes.

11 **Q.** So would its finding be consistent with EPOSS --

12 **A.** Yes.

13 **Q.** Then the third document that you've referred to as the
 14 implementation audit, and that at FUJ00079788, please,
 15 and that's around the same time, so we're looking at
 16 summer/autumn 1999. Again, if we scroll down, this went
 17 to Martyn Bennett. It went to yourself. You didn't
 18 actually write this report; is that right?

19 **A.** No, that's right. Stanley Loam did.

20 **Q.** Then if we look at page 5 there's the Management
 21 Summary. Thank you very much. I don't think we need to
 22 read the Management Summary in depth, but would it be
 23 fair to say that there was some criticisms there
 24 focusing on lack of processes and procedures and
 25 documentation in certain areas?

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1 A. Yes, I think so, yes.
 2 Q. Thank you very much. That can be taken down.
 3 All of those three reports that you have mentioned
 4 as most significant for this Inquiry, am I right in
 5 saying that they all went to the senior management of
 6 ICL Pathway?
 7 A. With the exception of the EPOSS Task Force, no, that had
 8 a very restricted distribution, and the reason for that
 9 being Terry commissioned that piece of work because he
 10 wanted to know what was going on. So, therefore, when
 11 I did the work through the Task Force, the report went
 12 to Terry and it was up to him what he did with it. It
 13 wasn't -- to my mind it wasn't a general distribution
 14 document.
 15 Q. But it did go to Mr Bennett as well?
 16 A. Well, as my boss, yes.
 17 Q. Were you aware of him raising it with senior management,
 18 the people that we've discussed?
 19 A. No, no, not aware of that.
 20 Q. Do you think it was likely or unlikely that it would be
 21 discussed?
 22 A. I really don't know. I can't comment.
 23 Q. What about sharing with the Post Office? Are you aware
 24 of any of those three documents or their substance being
 25 shared with the Post Office?

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1 with this document, this date issue that we've been
 2 looking at this morning. It may be that you are not,
 3 but let me take you to the documents to see where we get
 4 to.
 5 Let's look at FUJ00080690. This is the main one
 6 that we have been working from, and you will see there
 7 it's called version 1.0 and it's dated 2001. But we
 8 know, of course, that the Task Force itself took place
 9 in 1998.
 10 Can we now look at FUJ00121098. This is a version
 11 that Mr Beer took Mr McDonnell to. That is referred to
 12 as in the top right-hand corner version 0.1 with a date
 13 of 16 February of 2000.
 14 Then, if we go to FUJ00079782 and can we go to
 15 page 2 of this, this is the CSR+ development audit. If
 16 you look at page 2 and we scroll down page 2, it refers
 17 to associated documents there. Could we scroll down and
 18 if you look at item number 6, it has there, "IA/REP/008
 19 version 0.3" dating back to 29 September 1998 Report on
 20 EPOSS PinICL Task Force.
 21 It might be worth noting just really for the
 22 record, at paragraph number 7 below, there is a report
 23 there to the document that we can't find, which is the
 24 Report on EPOSS solutions.
 25 Are you able to help us at all about these various

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1 A. No. It would be highly unlikely for audit reports to be
 2 shared with the Post Office. I think, in keeping with
 3 most audit departments, the reports are for management
 4 use purpose. If they choose to share them, that's up to
 5 them. But, as an auditor, I'm not at liberty to just
 6 distribute reports willy-nilly.
 7 Q. To the best of your recollection, in relation to those
 8 three reports, were they shared?
 9 A. Not to my knowledge.
 10 SIR WYN WILLIAMS: Before Mr Blake goes on, I'm sorry,
 11 I missed a detail. You did tell us who you thought
 12 might have authored the implementation report and
 13 I missed it.
 14 A. Sorry, his name was Stanley Loam, L-O-A-M.
 15 SIR WYN WILLIAMS: Thank you.
 16 A. He was employed as an auditor at the time.
 17 SIR WYN WILLIAMS: Thank you very much. Sorry, Mr Blake.
 18 MR BLAKE: Not at all.
 19 Would he have fallen underneath your level? Were
 20 you his manager, or were you on the same level; do you
 21 remember?
 22 A. No, I mean -- yes, organisationally he sat below me on
 23 the chart but, you know, we worked as equals.
 24 Q. I'm going to move on and concentrate on that PinICL Task
 25 Force because I just want to see if you can help us at

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1 dates and versions?
 2 A. Okay, well, version 0.1 that's dated September '98 --
 3 yes?
 4 Q. '98?
 5 A. Yes, the first version 0.1 '98, was the report I wrote
 6 in the first place, okay? Version 1, if you notice in
 7 the Document History section, it says "Move to 1 as an
 8 admin exercise". That was just to move it up to
 9 version 1 to get it out of draft. That was all. That
 10 was me; I did that. I don't think -- there weren't any
 11 changes to it at that time. It was just me moving it
 12 forward.
 13 0.3, I can only assume that some work had been
 14 done on the document up to 0.3 later in September '98
 15 and that would have been sat in PVCS which was the
 16 document repository. So you got 0.1.
 17 Q. 0.1 seems to be dated 2000 rather than 1998.
 18 A. Can you show me.
 19 Q. Yes, that is FUJ00121098. If it helps, it was just the
 20 document we saw just before. So in the top right-hand
 21 corner there --
 22 A. I don't -- I sort of don't recognise that as a date that
 23 corresponds to the version.
 24 Q. If we go back to FUJ00080690 -- and that's the first one
 25 that I took you to and it's the one that we've been

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1 working on -- you've had time to consider that document.
 2 Do you consider that that is the original version that
 3 you authored?
 4 **A.** Yes, yes.
 5 **Q.** So you're not aware of any substantive changes at all?
 6 **A.** Well, no, not unless I made them, and I wouldn't know
 7 what they are now. But there would be nobody else who
 8 would have updated that document.
 9 **Q.** Thank you.
 10 I'm going to move on to 2000. Can we look at
 11 WITN04600104, please. In your statement it's page 6,
 12 paragraph 9f. We don't need to go to it, but you say
 13 you had concerns that continual change of EPOSS code
 14 would generate instability, and that's something we've
 15 heard this morning as well.
 16 **A.** Yes.
 17 **Q.** Having written the original report, the EPOSS Task Force
 18 report, like Mr McDonnell, were you particularly
 19 concerned about the EPOSS product?
 20 **A.** Probably not in the same way that he was. I was
 21 concerned from the point of view of its impact and
 22 effect on the remainder of the program me, whereas he was
 23 I think particularly interested in EPOSS as the product,
 24 because he was that person at that time. My concern was
 25 just more of a general -- the state of the programme

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1 they are being raised."
 2 We are talking here May 2000, although this
 3 document is a document that keeps on getting updated,
 4 isn't it? So it dates back at least before
 5 November 1999, because that's November at the top.
 6 17 November is the first entry on this particular page.
 7 **A.** Yes, in fact, 17 November is the first entry for all of
 8 the actions, which is where I had the original
 9 discussions with Mike Coombs, to agree or disagree with
 10 the proposed action or the proposed recommendation,
 11 sorry, and therefore what was to be done about it.
 12 That's why all the initial entries for this are dated
 13 17 November.
 14 **Q.** Thank you very much. On that left-hand side, it refers
 15 again to the EPOSS solutions report.
 16 **A.** Yes.
 17 **Q.** So presumably you would have seen EPOSS solutions report
 18 at that time?
 19 **A.** At the time, yes, I guess so.
 20 **Q.** It refers to the poor product quality, and
 21 recommendation that it should be reconsidered, and this
 22 is the follow-up.
 23 If we look at 25 November 1999, there's the email
 24 that we heard about this morning from Terry Austin,
 25 about not formally closing it down.

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1 moving forward, if it's got unstable or products that
 2 don't work sat in it.
 3 **Q.** Did you have a significant concern about that?
 4 **A.** Well, define "significant". I mean, it's ...
 5 **Q.** On your list of concerns, how high up --
 6 **A.** How high up the scale is significant? Yes, I would say
 7 it was significant, yes.
 8 **Q.** This document schedules the response to certain
 9 corrective actions.
 10 **A.** Yes.
 11 **Q.** Can we look at page 9, please. We have seen this this
 12 morning, so I can probably take it quite quickly.
 13 **A.** Yes, I noticed this morning -- sorry, if I can just say,
 14 when you were talking to Dave, you stopped at the bottom
 15 of page 9. There is more to this corrective action
 16 overleaf.
 17 **Q.** Yes. There are actually two versions of this document.
 18 One is an earlier version. This is a later version. We
 19 will scroll on in a minute, and it will have the full
 20 detail, and I will definitely take you to that.
 21 Let's start at this page, though. On the
 22 left-hand side it says that:
 23 "The audit identified that EPOSS continues to be
 24 unstable. PinICL evidence illustrated the numbers of
 25 PinICLs raised since the 1998 Task Force and the rate

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1 **A.** Mm-hm.
 2 **Q.** Is it right to say that he asks you essentially, "Can we
 3 close this down"?
 4 **A.** Yes, he did.
 5 **Q.** Why would he be asking you?
 6 **A.** Because I suspect, in his opinion, he felt that the
 7 explanation he provided was sufficient to warrant
 8 closure. It becomes a bit of a judgment call. If you
 9 don't have any objective closure criteria, then you
 10 can't say, "Yeah, you've done that, so close it off."
 11 It's more an agreement between people, groups.
 12 **Q.** Yes, because this was a recommendation that it should be
 13 reconsidered rather than it has to be done and,
 14 therefore, if it had been a recommendation that it
 15 needed to be done, presumably you couldn't close it
 16 until it was done.
 17 **A.** Well, I mean, to be fair, a recommendation is always
 18 only ever that, isn't it, a recommendation? You can
 19 recommend that it is rewritten, full stop. If that's
 20 not taken by the organisation, there's not a lot you can
 21 do about it.
 22 **Q.** Then shall we scroll down, because then we see what
 23 happens after that. 8 December, JH -- we've heard
 24 that's you; do you agree?
 25 **A.** Yes.

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1 Q. Yes. So:
 2 "Jan Holmes requested statistics on fixes
 3 delivered to live from RM."
 4 Now, there was a suggestion that was release
 5 management; is that right?
 6 A. Yes.
 7 Q. Thank you.
 8 "Also informed TPA [Terry Austin] that requires
 9 agreement of MJBC [that's Mr Coombs] --
 10 A. Mike Coombs, yes.
 11 Q. -- "before this can be closed."
 12 Can you tell us about that entry.
 13 A. Yes, I wasn't prepared to accept Terry's request on the
 14 strength of what he'd said. So I wanted to get some
 15 further information about PinICL numbers and fixes, and
 16 I wanted to involve Mike in the closure as he was the
 17 Programme Director. Still Terry at that time was just
 18 the Systems Director.
 19 Q. Is the background to those reports that we've seen that
 20 were quite critical, and are we to infer from that that
 21 you saw it as something that needed quite a great deal
 22 of scrutiny?
 23 A. Yes, yes.
 24 Q. The next entry:
 25 "Mr Coombs confirmed that, unless RM statistics
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1 manager, obtaining reports of the status of errors and
 2 PinICLs and what have you. Now, it's a bit moot,
 3 because I think the source of both of those pieces of
 4 information was the same report. So the release
 5 management report was in fact the same report that was
 6 going to Pete, so that he knew what was going on.
 7 I don't know that for sure, but I think that was the
 8 case.
 9 Q. So it seems as though you've obtained details directly
 10 from release management --
 11 A. Yes.
 12 Q. -- which are likely to be exactly the same as Mr Jeram's
 13 figures, or not?
 14 A. Quite possibly, but the issue here was trying to get the
 15 thing closed, because it could just have stayed open
 16 for, you know, months and months and months more.
 17 Q. And how were you able to obtain that information?
 18 A. Probably asked for them.
 19 Q. On, say, 8 December 1999 presumably Mr Jeram could also
 20 have asked for them?
 21 A. I believe so, yes.
 22 Q. Would he have had access to them as of right? Would he
 23 have had to ask somebody? Would they be emailed to him?
 24 A. I don't know whether he would have to request them or
 25 whether he got them.
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1 contradicted reports provided by PJ [that's Mr Jeram?]
 2 A. Pete Jeram.
 3 Q. -- "the recommendation could be closed and then the
 4 7th" --
 5 Well, let's stop there. What was going on there?
 6 A. Well, the way that one's written, I was waiting for that
 7 information to come forward to move the corrective
 8 action along, but clearly nothing was happening. This
 9 information was not forthcoming from wherever, release
 10 management or from Pete. So that's why in April I tried
 11 to force the issue by providing the information that
 12 I was waiting for. I know that sounds a bit peculiar,
 13 but sometimes you have to do it that way in order to
 14 elicit a response.
 15 Q. So we have your entry for 7 April and that's "Email ..." Presumably from you then --
 16 A. Yes.
 17 Q. "... to Mr Coombs, Mr Austin and Mr Jeram providing
 18 details of release management EPOSS fixes to live. Asked for confirmation that matched PJ [that's Mr Jeram] reports. If does then will close."
 19 What were Mr Jeram's reports that are referred to
 20 there?
 21 A. I think as the -- Pete was a release manager, I think,
 22 at that time. So he was, in his role as release
 23 manager, obtaining reports of the status of errors and
 24 PinICLs and what have you. Now, it's a bit moot,
 25 because I think the source of both of those pieces of
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1 Q. I think we're going to come to it, but I'm interested in
 2 why it may have taken so long to respond to you on this
 3 occasion. Let's look at the May entry, 3 May:
 4 "Reminder email sent to above, seeking early
 5 response. Chased on same day."
 6 So again is that you chasing a response?
 7 A. Yes. I mean, it's perhaps a little indicative of the
 8 fact that sometimes as an auditor you do have to chase
 9 management to actually do their end of the deal. So
 10 that was a bit disappointing that it took from December
 11 through to May and involved reminders to get things
 12 done.
 13 Q. Then I'll just read that final entry. So this is the
 14 response from Mr Coombs. We've heard it before, but
 15 just for the purpose of the record and to refresh your
 16 memory, it says:
 17 "As discussed, this should be closed. Effectively
 18 as a management team we have accepted the ongoing cost
 19 of maintenance rather than the cost of a rewrite."
 20 The reference to management team, is that the same
 21 as the management team that we discussed at the
 22 beginning of your evidence or --
 23 A. I believe so I, yes.
 24 Q. "Rewrite of the product will only be considered if we
 25 need to reopen the code to introduce signature changes
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1 in functionality. We will continue to monitor the code
2 quality (based on product defects) as we progress
3 through the final passes of testing and the introduction
4 of the modified CI4 code set into live usage in the
5 network. PJ [Mr Jeram] can we make sure that this is
6 specifically covered in our reviews of the B&TC test
7 cycles."

8 Did management ever go back to you after that
9 occasion to say that they had made a mistake or that
10 they were still reviewing?

11 **A.** No, no. Once it's closed, it's closed.

12 **Q.** Now, I'm going to just take you to a couple of
13 documents. I know you've been following this Inquiry,
14 so you will have seen this documents put to other
15 witnesses. I'll just briefly look at them.

16 Can we look at FUJ00058190. Did you receive these
17 month reports?

18 **A.** No.

19 **Q.** Can we just look at page 24, please, and it's the part
20 under Acceptance Loose Ends that I took another witness
21 to, and it's the second paragraph there. Sorry, can we
22 just go back to the first page.

23 So we're in February 2000 here. So this is before
24 that final response and closure. Page 24, please.

25 Thank you. Just below Acceptance Loose Ends, it's that
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1 areas.

2 "I suggest a workshop is set up, led by either
3 Requirements or EPOSS, to present the current end-to-end
4 solution, identify the problem areas and then agree the
5 necessary changes to achieve a consistent solution",
6 et cetera.

7 So those are just a couple of examples I have
8 taken, February 2000, April 2000. We know from that
9 schedule of corrective action that you had chased in
10 December '99, again in April 2000. Are you aware of
11 anything going on behind the scenes in relation to
12 problems with the EPOSS product?

13 **A.** No.

14 **Q.** Looking at these examples, do you think that there was a
15 problem going on behind the scenes?

16 **A.** Well, looking at the examples, yes, I think there
17 probably was.

18 **Q.** You say at paragraph 9i of your witness statement, given
19 the senior management involvement with the resolution,
20 you considered this to have been adequately resolved at
21 the time, this being -- essentially I think it's the
22 email from Mr Coombs.

23 **A.** Yes. In the context of the corrective action in the
24 audit, yes, I did.

25 **Q.** You phrase that in past tense. You considered this to
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1 second bullet point:

2 "We have dealt with queries from POCL concerning
3 AI376. One formal letter has been responded to,
4 attempting to avoid the conclusion that we have not
5 found EPOSS reconciliation incidents that we should have
6 found, or that we have not reported those we did find.

7 In reality CS are greatly hampered in 'spotting the
8 incident' because the reports have not had fixes
9 implemented and report large amounts of do-nothing
10 information. We have attended the Release Management
11 Forum and proposed some reordering of the fix backlog,
12 but it will be at least until the first week of March
13 before this situation improves."

14 I'm just going to take you to one other document
15 that has been put to other witnesses and that's
16 FUJ00079332. This is an email we think it's 1 April
17 2000 although it could be 4 January depending on whether
18 it's an American or British format.

19 I'm just going to read the first paragraph there.

20 It says:

21 "We are getting an increasing number of PinICLs on
22 the end-to-end system handling of the new CI4
23 transaction modes ... leading to cash account
24 mis-balances and reconciliation errors. These PinICLs
25 are generally being batted about between different
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1 have been adequately resolved at the time. You, I know,
2 have followed this Inquiry very carefully. Do you now
3 consider that it had been adequately resolved at the
4 time?

5 **A.** Well, it would appear not, wouldn't it?

6 **Q.** Another thing that you say in your witness statement is
7 you refer to a "test error-identify bug-code fix-re test
8 cycle". I have no idea what that meant; if you can
9 clarify that.

10 **A.** Yes. The question was asked in the lead-up to the
11 witness statement about PinICL fixing culture, which is
12 a phrase I used in the EPOSS Task Force report, and in
13 fact it was a phrase that David used this morning.

14 Really, it was just a case of: "Bug, what is it?

15 Fix it, put it over the wall, test it, hand it away."

16 It was in the context of, I didn't see any evidence or
17 any efforts being made to actually stand or sit back,
18 stand back from the problem and say, "Do we have any
19 root causes that we can attribute these problems to and,
20 if we do, what are they?" I didn't see any of that
21 happening and I wasn't made aware of any of it
22 happening. It was just a case of, "Oh, here's another
23 bug. Let's fix it and let's move on."

24 **Q.** Is that something you considered at the time or is that
25 on reflection?

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1 A. No. I considered it at the time. You know, I made the
 2 point in the audit report that that was going on. It
 3 was just, you know, fix and move, fix and move, fix and
 4 move and, you know, we all know that that's not
 5 necessarily the right way to do anything.
 6 Q. I'm going to move on to a totally different subject.
 7 Are you okay to go on?
 8 A. Yes.
 9 Q. Thank you. That's audit trails, and it's again
 10 something that's been of interest to, in particular,
 11 some of the Subpostmaster Core Participants. Can we
 12 look at FUJ00118196, please.
 13 Now, the date we have at the top of here is
 14 10 November 1999. I can say we have later versions of
 15 the same report. They are materially the same as this
 16 one in respect of the point I am going to ask you about,
 17 but do say if you disagree.
 18 A. No, I agree. The later versions were synced in with
 19 later releases of the product where the content of the
 20 audit trail may have changed. That was all it was.
 21 Q. This one is around the time of the roll-out?
 22 A. That's correct, yes.
 23 Q. Can we look at page 16, please. I won't read that out,
 24 but it sets out audit trail retention periods, and it
 25 says that the normal retention period would be a period
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1 the Inquiry. It's FUJ000000071. Thank you very much.
 2 That's the codified agreement that was signed in the
 3 summer of 1999. Can we look at page 97, please.
 4 It's 4.1.8 and 4.1., 9 which address prosecution
 5 support, and again it refers there to the requirement
 6 829, so this part of the contract being part of that
 7 requirement or addressing that requirement.
 8 Is this something that you were well aware of at
 9 the time?
 10 A. Yes, in the way it -- sorry, the way it impacted on the
 11 operational audit trail, yes.
 12 Q. We will return to this shortly but, if you weren't told
 13 within the 18-month period that there was an
 14 investigation and that certain data would be needed for
 15 that investigation, would that information not be
 16 retained?
 17 A. Correct.
 18 Q. I think we're going to look at Cleveleys incident
 19 shortly. Was there a subsequent change of position in
 20 relation to that retention of data?
 21 A. I think that was probably when Network Banking came in
 22 and there was an obligation to retain data for seven
 23 years, in line with the commercial audit trail records.
 24 I think it's probably worth going back over the audit
 25 trail functional statement, just to explain the
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1 consistent with the Companies Act or 18 months,
 2 whichever is longer, and that in the case of prosecution
 3 support this may be longer in accordance with
 4 requirement 829. Is that right?
 5 A. Yes.
 6 Q. Can you tell us about requirement 829?
 7 A. Yes. Requirement 829 was to do with the efficacy of the
 8 audit trail in relation to prosecutions and being
 9 evidentially submissible in court in line with PACE.
 10 I'm no expert on PACE and in fact I'm not trying to
 11 shirk it here, but this requirement was actually
 12 a security requirement and not an audit requirement.
 13 So, in terms of making it happen, if you like, at
 14 acceptance or whenever, we weren't involved.
 15 What we did do in audit, though, was we made every
 16 effort during the design and building of the audit
 17 solution with the operational audit trail in it, the
 18 integrity of those records was maintained from the point
 19 of generation to the point of extraction onto a CD-Rom
 20 to be given to the Post Office to do with whatever they
 21 wanted.
 22 Q. Thank you very much. I'm going to very briefly take you
 23 to the codified agreement. It is a very lengthy
 24 document. We're only going to look at a short passage
 25 which I am sure you have already seen having followed
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1 difference that existed. Whether it's valid or not
 2 remains to be seen now.
 3 The audit trail functional spec was the stepping
 4 stone between the requirements and the system. It
 5 identified two types of audit trail: the commercial
 6 audit trail, which we hooked into the term records in
 7 the contract, and the operational audit trail which was
 8 the record of transactions and events that occurred
 9 through the system, okay?
 10 We had different rules of access for each of those
 11 trails. The audit of the access to the commercial audit
 12 trail records would usually be done through physical
 13 audits of offices, and records, and filing cabinets, and
 14 what have you. The operational audit trail was all held
 15 electronically and stored on magnetic tape for the
 16 required period, and then had to be extracted back out
 17 and put onto CDs for delivery.
 18 Q. I want to go over a dispute that occurred in early 2000
 19 about the retention of information. I'm going to start
 20 in the summer of 1999. Can we look at WITN05970134,
 21 please. Thank you very much. This is a document that
 22 Mr Folkes was taken to. Did you see his evidence?
 23 A. No.
 24 Q. Mr Folkes told us that, I think, he produced the words
 25 in the boxes. So it's a response to the words written
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1 above, and it's a Post Office document. You wouldn't
 2 have seen this at the time?
 3 **A.** No.
 4 **Q.** We know from the top paragraph that it at least occurred
 5 after 15 July 1999, because that's when the terms of
 6 reference were agreed. Can we look at the first two
 7 substantive paragraphs under POSIS Investigations at
 8 Outlets, please. I'm going to read this, for the
 9 record. It says:
 10 "We were extremely concerned to be informed during
 11 the review that POSIS ..."
 12 Who were POSIS?
 13 **A.** No idea.
 14 **Q.** "... currently don't have access to archived data from
 15 the system. Data on the [live] system is compressed and
 16 archived after 35 days. It was originally intended that
 17 access would be gained via the Fraud Risk Management
 18 Server, which formed part of the benefits payment system
 19 and has now been withdrawn. This means the business
 20 could be in a position where it is unable to investigate
 21 potential frauds or prosecute cases due to the
 22 unavailability of critical data.
 23 "Bob Martin, External Crime Manager for POCL's
 24 Security Investigations Executive, informed us that this
 25 issue has been raised with senior managers from the
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1 what's the Post Office number, because we need to get
 2 information over a period of time for that post office,
 3 and for BA it would be: what's the National Insurance
 4 number, because we want to get information about that
 5 over a period of time.
 6 But there was very little in terms of detail, and
 7 it took quite a lot of time to get it out of them. Now,
 8 the question of the numbers or -- well, that's that
 9 piece.
 10 Let's look at FRMS. As you are probably aware,
 11 FRMS was a BA service, and that was what they were going
 12 to use to do their investigation. But you have to
 13 realise it would have been populated with BA-specific
 14 data. There would have been no Post Office data on it.
 15 So, as it stood, it would have been no use to the Post
 16 Office as a fishing tool.
 17 So they were left then with a retrieval service
 18 which was based on minimal requirements. I think we
 19 reckoned we'd be able to do about one a month because it
 20 was quite intricate, the way it had to be done. So we
 21 felt with existing staffing we could do perhaps one or
 22 two a month, but that was it.
 23 Sorry, that was also assuming we were dealing with
 24 Post Office internal audit, not with various Post Office
 25 investigation units who numbered hundreds of people
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1 product. Les Thorpe, Investigation manager in the
 2 North-East Region, advised us that Pathway had estimated
 3 the cost to reintroduce the Fraud Risk Management Server
 4 to be in the region of £180,000 with an additional fee
 5 of £1,500 per manday for performing extraction. These
 6 concerns were highlighted after a possible fraud at
 7 Grange Park SPSO which is involved in the Horizon live
 8 Trial."
 9 Do you remember anything about the Grange Park
 10 case?
 11 **A.** No, no.
 12 **Q.** Were you involved in discussions at this time with the
 13 Post Office about the retention of data and the cost it
 14 might involve, for example?
 15 **A.** Not with retention, because that was already sorted out
 16 through existing solution. We did have, or I did have
 17 a number of conversations -- this was before BA dropped
 18 out -- with both BA and Post Office internal audit,
 19 about what their retrieval requirements were for bulk
 20 data at the data centre, so the operational audit trail.
 21 They really didn't know what they wanted, how many they
 22 wanted, how they wanted it presented, how they were
 23 going to ask for it.
 24 I suppose it was fairly obvious that, from a Post
 25 Office point of view, one of the key factors would be:
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1 around the country suddenly saying, "We want this data,
 2 we want this data, we want this data."
 3 **Q.** We'll come to that particular disagreement. If we could
 4 scroll down slightly, we have the box there from
 5 Mr Folkes, and in the second paragraph he says:
 6 "... the replicated copy of [the] data is held at
 7 the data centre and is retained for 90 days within the
 8 Riposte messaging store. Every record is written to
 9 tape to be retained for the period for which we have
 10 contracted, (usually 18 months, but extended
 11 indefinitely if specific records are needed for the
 12 support of a prosecution) and to be made available to
 13 POCL under the contracted audit requirements."
 14 So it highlights that, I think, POCL has access to
 15 the data centre; is that right?
 16 **A.** Yes. Not direct access to the data centre; that was
 17 through the retrieval process.
 18 **Q.** When you say the retrieval process?
 19 **A.** The retrieval process that was run by Pathway.
 20 **Q.** Is that the request for information process?
 21 **A.** Yes.
 22 **Q.** We will come to that. If we can go over the page, he
 23 says POCL's TIP system had transaction data that could
 24 also be obtained by POCL itself. Would you agree with
 25 that?
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1 A. Yes.

2 Q. Thank you. Then there's a section on Fraud Risk
3 Management Service and in bold letters there it says:
4 "The BA Fraud Management Service was never
5 intended to act as a means of accessing specific POCL
6 transaction data, and indeed being a BA service the
7 non-BPS transaction data should not have been able to BA
8 (for sound commercial and data protection reasons)."
9 Is that what you were just saying to me?

10 A. Yes.

11 Q. So that particular management service was built for the
12 Benefits Agency, not for POCL?

13 A. That's correct, yes.

14 Q. If we look at number 6 there, it says:
15 "If POCL did wish to establish its own FRMS,
16 geared to POCL's data (and, therefore, not restricted to
17 only BPS-related activities), this could of course be
18 done, and Pathway would undoubtedly be willing to
19 provide this service. However, this would be a new
20 requirement, and would need to be funded. Note the
21 distinction here between a full FRMS, with sophisticated
22 data mining and reporting tools, aimed at detecting
23 patterns, et cetera, and simple access to transaction
24 data, which FRMS was never intended, to provide."
25 So he seems to be saying there that POCL could

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1 information from Pathway's central system, under the
2 auspices of a requirement on Audit (requirements 699 and
3 829), using a 'request for information' procedure."
4 So again that's something I will take you to
5 shortly, but you had a formal procedure to access audit
6 data; is that right?

7 A. Yes, that's correct, because we had had a couple of
8 instances where we'd been getting requests in from
9 various people within Post Office, and we probably tried
10 to deal with them with best endeavours. But then, you
11 know, it soon became onerous and we, therefore, had to
12 work out a way of doing this properly. That's when
13 Hilary and I agreed, and then Chris Paynter that we
14 would have single point of contact, and this was to
15 filter down all of these various investigation units
16 that suddenly seemed to say, "Well, we want dibs on this
17 data." So ...

18 Q. Did that all come as a surprise to you?

19 A. Yes.

20 Q. Was it something that was discussed during the earlier
21 stages?

22 A. No, no, not to my knowledge.

23 Q. Looking at paragraph 8 there, this again refers to
24 Grange Park case where the request didn't follow the
25 correct route, so presumably not through a request for

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1 have a similar service but it would need to be paid for.
2 Were you ever party to those kinds of discussions?

3 A. No.

4 Q. I mean, he identifies it might involve reporting tools
5 aimed at identifying different patterns, for example,
6 rather than simple access to transaction data. Is that
7 something that you ever considered?

8 A. No. If that was part of the activity that the FRMS
9 could supply, then I wasn't aware of that. That was run
10 by a different part of Martyn Bennett's organisation.
11 But yes, I mean, all we were providing through the audit
12 data was simple transaction data. We weren't doing any
13 analysis of it, we weren't doing any manipulation of it.
14 We were just pulling the records off the archive,
15 putting them onto CDs and sending them on.

16 Q. So you wouldn't, for example, look at trends that are
17 relevant to the prosecution of postmasters?

18 A. No, I mean, why would we? We're the suppliers of the
19 service. We're not involved in, you know, running the
20 Post Office's business other than providing data that
21 they might need.

22 Q. Can we scroll down to see 7 and 8, please. Audit Access
23 to Transaction Data. It says:
24 "A documented process has been established between
25 POCL and ICL Pathway for access to historical audit

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1 information. It talks about a potential opportunity to
2 improve the agreements between yourselves.

3 A. Yes.

4 Q. Does that jog your memory at all about Grange Park?

5 A. No, not as an individual Post Office, no.

6 Q. Do you remember cases in the early days when there may
7 have been a refusal for audit data because it didn't
8 follow the correct procedure?

9 A. No. I mean, I know I was involved in seven or eight
10 enquiries, a few of which I supplied witness statements
11 to, and possibly some I also supplied data to, because
12 at that time it was me that was doing the retrieval
13 work. So yes, it's possible I was doing that. But then
14 that was on the best-endeavours basis, and it was only
15 when it started to get out of hand that we had to put in
16 place a gatekeeper role which was Chris Paynter.

17 Q. Can we go over the page, please, to the paragraph that
18 begins "Bob Martin". It says there:
19 "Bob Martin also advised us" -- this is from the
20 original Post Office drafting, not the addition --
21 "... also advised us that Security and
22 Investigation Executive had requested an expert witness
23 statement from Pathway to support a prosecution and this
24 had been refused on grounds that there was no
25 contractual requirement. John Cook advised us that

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1 there is a contractual requirement for Pathway to ensure
2 the system meets the requirements of the Police and
3 Criminal Evidence Act. There is a need for Pathway to
4 agree with S&IE and Internal Audit how this requirement
5 will be met, as well as the procedures for obtaining
6 this evidence when needed for prosecutions."

7 Do you remember the example that's given there
8 about a request for an expert witness statement that had
9 been refused?

10 **A.** No, no. As I say, I produced several, initiated by
11 different people. I produced one initiated by a police
12 sergeant as part of his investigation. So to some
13 extent at that time, as I said, it was best endeavours,
14 and we would do what we could. With regard to "no
15 contractual requirement", I mean, I'm not a PACE expert
16 but, if witness statements form part of PACE and the
17 continuation of evidence and support of evidence, then
18 I can't see how it couldn't have been covered by the
19 contract.

20 **Q.** In relation to your own statements, were they criminal
21 proceedings, civil proceedings --

22 **A.** They were in support of whatever the Post Office were
23 doing.

24 **Q.** And who asked you to provide those?

25 **A.** Well, as I say, a variety of people, I think. As I say,
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1 **SIR WYN WILLIAMS:** So they have a hunch that you might be
2 the right person?

3 **A.** No. I did deal with individuals over time. Hilary
4 Stewart was the latter one, taken over by Chris Paynter.
5 There was another guy called Richard Cruise. I had some
6 dealings with him but I think he subsequently left. So
7 it wasn't just a case of anybody could ring me up and
8 say, "We need a witness statement."

9 **SIR WYN WILLIAMS:** So if I understand you correctly, persons
10 who were known to you from working in conjunction with
11 them over time and who would know that you would have
12 the ability to provide this information?

13 **A.** I think that's fair comment.

14 **MR BLAKE:** Did you ever give a statement that addressed
15 whether there were bugs or defects in Horizon?

16 **A.** No.

17 **Q.** We've heard about Gareth Jenkins. Did you know Gareth
18 Jenkins?

19 **A.** Yes, I knew Gareth Jenkins.

20 **Q.** Were you aware that he provided statements in relation
21 to criminal proceedings?

22 **A.** I am now, yes.

23 **Q.** Were you aware at the time?

24 **A.** No.

25 **Q.** Do you know why he might have been approached to give
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1 I had one request from a police sergeant who was doing
2 an investigation into a post office. I did another one
3 for Cleveleys, Cleveleys Post Office. I think I did one
4 or two others as well.

5 **Q.** We'll look at the Cleveleys example shortly.

6 Who internally was asking you to provide that
7 statement; do you remember?

8 **A.** What, you mean in terms of Pathway?

9 **Q.** Yes.

10 **A.** Nobody. It was directly between me and the person
11 requesting it from the other side.

12 **Q.** So, when it was the Post Office, for example, who would
13 it have been that asked you to provide a statement?

14 **A.** It may have been Hilary, it may have been whoever was
15 involved with that investigation. As I said, this is in
16 the very early days when we were just understanding how
17 this thing was going to work. So it was always on
18 a case of best endeavours, and trying to meet what the
19 customer wanted.

20 **Q.** We've heard --

21 **SIR WYN WILLIAMS:** Is this just a discussion between you and
22 the person, just someone approaches you, and says --

23 **A.** No, I'm sure I would have been looking for somebody with
24 some authority. It wouldn't just be anybody in the
25 office.

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1 those statements?

2 **A.** Well, possibly because he was quite a knowledgeable
3 person on the workings of the system. I'm not technical
4 but, if I wanted some technical input to understand
5 something about how the system was working, to be fair,
6 Gareth was my go-to guy, because he knew a lot about
7 a lot and so, you know, I made use of that knowledge as
8 and when I needed to. So, if he was doing witness
9 statements, I'm hardly surprised.

10 **Q.** Did you know somebody called Ann Chambers at all?

11 **A.** No. I remember reading the article, and I was thinking
12 of somebody else called Ann on the project, but it
13 wasn't Ann Chambers. No, I didn't even recognise the
14 face.

15 **Q.** Were you aware of other people giving witness statements
16 to support criminal prosecutions?

17 **A.** Yes. After I came back on to the project in 2001, the
18 actual activity of data retrievals and provision of
19 prosecution support had passed from audit, if you like,
20 into the live customer support environment and was under
21 the security banner. They had an operator there who was
22 doing the retrievals, and she often had to provide
23 a witness statement in support of the retrieval to
24 explain how it was done and how the integrity of the
25 data had been maintained.
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1 Q. Do you remember who that was?
 2 A. Not the off the top of my head, no, but I know where
 3 I can find out.
 4 Q. Staying with this document before we go to the RFI
 5 procedure, if we could just scroll down, there's
 6 a section on Transaction Processing and, if we go over
 7 the page, it says that, "TP [transaction processing]
 8 were also concerned at", and then the first one on top
 9 of that page:
 10 "The legal implications of manual alterations to
 11 computerised cash account by subpostmasters in the event
 12 of a court case."
 13 Is the ability to correct or erase data something
 14 that you were involved in at all from an ICL side from
 15 an audit side, for example?
 16 A. Can I just see the context of that paragraph. I find
 17 that top bullet hard to accept. Okay, I can understand
 18 the first bullet. I was not aware at all that
 19 subpostmasters had the ability to carry out manual
 20 alterations to computerised cash accounts.
 21 Q. And how about members of ICL?
 22 A. I'm not sure about that because I'm not sure the level
 23 to which third-line support SSC got involved in
 24 manipulating -- not manipulating, that's the wrong
 25 word -- in working the system in order to resolve issues
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1 dated 17 January 2000. Are you able to assist us with
 2 that at all?
 3 A. No, not really. I mean, it's sort of -- it went through
 4 a number of updates and drafting and improvements over
 5 time.
 6 Q. I think version 1.0 was April 1999, if that assists.
 7 A. It's quite possible.
 8 Q. We see there the name Chris Paynter POIA. Who was he?
 9 A. Chris Paynter was at that time the single point of
 10 contact for data retrievals.
 11 Q. What did POIA stand for?
 12 A. Post Office Internal Audit.
 13 Q. So was he from the Post Office?
 14 A. Yes.
 15 Q. Employed by the Post Office?
 16 A. Yes.
 17 Q. So this manual presumably was shared with the
 18 Post Office for a particular reason?
 19 A. Yes.
 20 Q. And what was that reason?
 21 A. Knowledge sharing.
 22 Q. Look at page 53, please, this is where the request for
 23 information is procedure set out. It says:
 24 "POIA will request audit data via Request For
 25 Information form. This will contains a description, in
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1 and problems at that third level of support.
 2 Q. Was it ever an issue that you had cause to investigate?
 3 A. No.
 4 Q. Can we look at POL00029165, please.
 5 Just looking at the time, sir, this might be an
 6 appropriate time for a ten-minute break.
 7 **SIR WYN WILLIAMS:** By all means.
 8 **(3.01 pm)**
 9 **(A short break)**
 10 **(3.11 pm)**
 11 **MR BLAKE:** Before the break we were looking at POL0029165.
 12 This is the Horizon System audit manual. Can you very
 13 briefly tell us what the purpose of this document was.
 14 A. Yes, what this document set out to achieve was
 15 a description of the audit trails. It was like
 16 a further expansion of the audit trail functional spec.
 17 So this was trying to present information in a way that
 18 was understandable, legible and could be recognised and
 19 used by the internal audit community, whether that's
 20 Pathway, Post Office or BA at the time.
 21 So it looked at the requirements, and it looked at
 22 the roles, and it looked at what could be done, and then
 23 it went into describe what actually each piece of the
 24 audit trail consisted of.
 25 Q. Thank you. It says there "Status, draft", and it's
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1 business terms, of the times outlets, events, items and
 2 activities that the Auditors are interested in. This
 3 request has to be interpreted by Pathway Internal Audit
 4 and mapped on to the Audit Points and Files described
 5 earlier in this manual."
 6 The focus there is on auditors obtaining the
 7 information. Is that intentional?
 8 A. Yes.
 9 Q. Why is that?
 10 A. Because that was -- they were the audience for that
 11 data, the audit data, as far as we were concerned,
 12 through the request for information process.
 13 Q. Was this route for obtaining information known by the
 14 Post Office?
 15 A. I don't know. I don't know the answer to that because
 16 I don't know what their internal communications were.
 17 Q. So you have somebody from the Post Office being on the
 18 distribution list.
 19 A. Yes.
 20 Q. Are you aware, just from your experience of liaising
 21 with people from the Post Office, whether they knew that
 22 this was a route or the route to obtain information?
 23 A. No, I don't.
 24 Q. If we go over the page, there's a section on
 25 Investigation Support, and that says:
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1 "The term 'investigation' is used in its broadest
2 sense and does not limit itself to fraud. Any RFI is
3 likely to be associated with a specific business event,
4 eg an encashment, a bill payment, an outlet,
5 a beneficiary. It is anticipated that the majority of
6 this type will be based on the TMS journal, or will use
7 it as a start point."

8 Can you explain that to us, please.
9 **A.** Yes. I mean, I think 829 refers to prosecution support
10 which implies perhaps some kind of fraudulent activity
11 but, at the end of the day, this data was available for
12 any kind of investigation that Post Office wanted to put
13 it to. Fraud would be one of them or suspected fraud.

14 **Q.** Can we look at page 57 and the bottom section on
15 page 57:
16 "Requesting audit data extractions. Prerequisite.
17 Post Office Internal Audit will be expected to identify
18 Auditors who are authorised to raise an RFI. It is not
19 anticipated that this list will exceed two names. It is
20 the responsibility of Post Office Internal Audit to
21 notify Pathway Internal Audit of any changes to this
22 list."

23 What was the purpose behind that?
24 **A.** Looking back, I guess it's to give Chris Paynter an
25 opportunity to have some deputies, or perhaps to have
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1 Post Office to Tony Oppenheim, and it's dated
2 10 January, although 10 is crossed out and it says the
3 11th, and it has your name there amongst others. Do you
4 remember this at all? I know you have seen it.

5 **A.** I remember the issue being around at the time, yes.
6 **Q.** Myles Blewett, was he a lawyer?
7 **A.** He was a lawyer with Masons.
8 **Q.** If we could scroll down, I'm just going to read a little
9 bit for the record and to refresh your memory. First,
10 halfway through the first paragraph:

11 "I understand the concern to be that, while
12 Pathway are co-operating over 'true' audit access, it is
13 being claimed that such provisions do not extend to
14 supporting investigations for security purposes. Martyn
15 has also suggested that if such access were to be
16 granted, then a charge would be levied."

17 The next paragraph starting the second sentence:
18 "Neither POCL nor the Pathway would wish to
19 initiate such investigations without due cause
20 (accepting that they may be time-consuming and
21 distracting for both organisations), but nevertheless,
22 where there are ground for suspicion, the issue must be
23 investigated thoroughly. Without such an investigation
24 we, jointly, could not be sure that the access controls
25 and integrity of the Pathway services are not being
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1 people in different parts of the organisation who could
2 request data with his authority.
3 **Q.** Why wouldn't it be available to anybody?
4 **A.** Well, because we'd be swamped. If there was no control,
5 then I couldn't -- well, I think we could have
6 anticipated that there were masses of requests because
7 people would -- it's like, if you suddenly find
8 something that works, you exploit it.
9 **Q.** When you wrote this in '99/2000, what did you see as the
10 role of the request for information in respect of
11 criminal prosecutions?
12 **A.** It was just one of a number of reasons why that RFI
13 might have been raised.
14 **Q.** So you did expect the RFI to be used for the purpose of
15 obtaining that information?
16 **A.** Yes.
17 **Q.** But I think you said before that you didn't expect the
18 volume; is that right?
19 **A.** That's correct, because in the early days the volume
20 was, as we thought it -- you know, as we saw it as being
21 in the 10s/low 20s possibly a year, based on what we
22 were being told.
23 **Q.** We're going to move on to the particular disputes that
24 I mentioned in 2000. Can we look at FUJ00121100,
25 please. This is a letter from Keith Baines of the
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1 breached.
2 "Apart from this practical perspective, I think
3 that denying such access is at variance with" --
4 That's the reference to the codified agreement
5 there that we have already seen and the reference to the
6 18-month period and the requirement to support
7 investigations.
8 Can we look over the page, please. At the bottom
9 there it refers to 801.3, it's a contractual term. Then
10 it says:
11 "Pathway should provide access and may be paid for
12 their assistance."
13 Then there's a holding response to that, and I'm
14 not going to take you to it but it's FUJ00121101.
15 Instead I'm going to take you to a note from yourself at
16 FUJ00058509, please.
17 **A.** Can I come back to that later?
18 **Q.** Yes, absolutely. Well, can you tell us in broad terms
19 what's going on there in that letter.
20 **A.** I think what was going on there is there was an issue
21 that -- there was a bit of confusion. As I said, the
22 audit trail functional spec identified two particular
23 types of audit trails, the commercial audit trail, which
24 I think links into requirement 699 that talks about
25 records, and I can't remember the requirement are number
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1 that the operational audit trail, and operational audit
2 trail, which were things like the TMS journal records
3 and OBCS files all this stuff that was point on Legato.

4 Now, access to the records, commercial audit
5 trail, was not done through the RFI process. That was
6 invariably -- if it was done it would be done through
7 a direct request into the likes of Tony Oppenheim for
8 access to the commercial records.

9 The RFI was for access to the operational audit
10 trail and, I think, if you go back to that previous
11 exhibit, there's reference in there to the records under
12 clause 801, and I think what's happened is that there's
13 been at the conflation of two different topics into one.

14 **Q.** I think you mention that in fact in this document that
15 we look at now which is a briefing note that you wrote.

16 If we look over the page, in fact, to page 3,
17 please, I think the first page explains that you have
18 received that letter and there's going to be
19 a discussion about it. Further down the page, please,
20 under Statements, did you write this section?

21 **A.** Yes.

22 **Q.** Let's look at paragraphs 2 to 4, please. It says:

23 "Arguably we already provide approximately
24 95 per cent of what they want via the TIP link on
25 a daily basis."

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1 that they should be coming to you?

2 **A.** That in effect is what I'm saying, yes.

3 **Q.** Can we go over the page, please:

4 "POCL have always maintained an organisational
5 distinction between the Network Auditors who access the
6 system that outlets and the Central Auditors who have
7 access to historical audit data at the centre via
8 Pathway Internal Audit.

9 "POCL have always been involved in development of
10 the Audit Trail Functional Specification, the Audit Data
11 Retrieval Requirements and the Horizon System Audit
12 Manual where this separation has been reflected in the
13 solution currently implemented."

14 Is what you are saying in paragraph 6, about the
15 document that I took you to before, where somebody from
16 the Post Office was sent the specification and you're
17 saying there that the Post Office has always been
18 involved in those discussions?

19 **A.** Indeed. I mean, the audit trail function spec was
20 a CCD. So it's a contract-controlled document. So it
21 couldn't be changed without the agreement of the
22 Post Office.

23 **Q.** You have said at 7 that:

24 "The audit solution in its current form has been
25 formally accepted by Post Office Counters Limited."

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1 Now, is that similar to what Mr Folkes was saying
2 in the document that I took you to earlier on?

3 **A.** I think it might be. I mean, I can't remember for sure,
4 but where my mind's going on this is that a lot of this
5 was to do with security investigation sort of doing
6 fishing trips, what if, with the data, "Let's have
7 a look at this and see what there is, let's have a look
8 at this", and not a case of, "We need this in order to
9 progress a case or a fraud or an investigation." I know
10 there's a subtle difference, but a lot of what we felt
11 they required could be achieved through TIP.

12 **Q.** In fact, you refer to fishing trips in paragraph 3.

13 **A.** Yes.

14 **Q.** So you say:

15 "This could serve as their 'fishing trips' which I
16 believe account for the few hundred queries anticipated
17 by Bob Martin."

18 **A.** Yes.

19 **Q.** "We would then extract from the audit archive to form
20 the prime evidence for prosecution or dismissal. This
21 approach was discussed with Hilary Stewart during the
22 development period and Acceptance."

23 So are you saying there that, if they want to look
24 at the data for their own investigations, they had the
25 TIP data, and it's only when formal evidence is required

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1 And at paragraph 8 you talk about clause 801,
2 which this point I think you were just making.

3 **A.** Yes, yes.

4 **Q.** Can we look at paragraph 11 --

5 **A.** I apologise for my intemperate language in there as
6 well.

7 **Q.** No, not at all. Perhaps you can tell us about the
8 atmosphere at that stage between yourselves and the
9 Post Office, and why you may have made that comment.

10 **A.** I think it was just a throw-away line from me, "How can
11 we be held responsible for a dodgy postmaster?" I mean,
12 to be fair, in my role as pulling audit data for
13 prosecution support, I had no idea or no knowledge at
14 all of what level of underlying fraud was going on
15 within the Post Office. I'm sure there was a level.
16 There must be in a network that large with that many
17 people. But how then that number would suddenly jump to
18 1 to 200 potential investigations a year, I just don't
19 know. It sort of wasn't our job to query that with the
20 Post Office. I would have expected them to have queried
21 that themselves to try and understand better why there
22 was this upsurge in perceived bad activity.

23 **Q.** Did you experience a sudden upsurge in requests?

24 **A.** It's only when we got sort of requests like the Bob
25 Martin's 1 to 200, and you think: why is this number

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1 suddenly up where it is? We weren't made aware of these
2 volumes. In fact, when we talked to people like Hilary
3 at the time and Jeff Robinson from the BA in the early
4 days, it was 10s, 10s/20s, which we felt we could
5 achieve within our current head count.

6 **Q.** Did you ever have a discussion with the Post Office as
7 to why there was this sudden increase?

8 **A.** No, and that's, I suppose, perhaps we could have done
9 a bit more to question the increase. I would have half
10 expected them to do their own investigation into that
11 matter, and not rely on others to say: why have you got
12 this increase in numbers?

13 **Q.** Can we go over the page, please, to page 5 and look at
14 paragraphs 11 and 12. Paragraph 11, about halfway
15 through that paragraph, it says:

16 "I do recall conversations with [and this is with
17 Hilary] over a period of time where we discussed the
18 potential for POCL using TIP data for their 'fishing
19 trips' and then coming to me for the true data once they
20 had progressed their investigation to a point of
21 prosecution or dismissal. We never formally agreed that
22 this would be the way to go but the potential was aired.
23 Again though, note that it was her 'regional audit
24 colleagues' and POCL Security Investigations."

25 Can you tell us what you're saying there.

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1 "In summary, Pathway maintain a transaction audit
2 trail for the required period of 18 months and allow
3 members of Post Office Internal Audit access to that
4 audit trail in accordance with the agreed procedures and
5 subject to known limitations which I described below.

6 "The issue we are concerned with has arisen for
7 two reasons. First, a POCL organisation other than
8 POIA, that is Post Office Network National Security
9 Team, has requested access to the transaction audit
10 trail to support security investigations. Second,
11 PONNST recently indicated (in November last year) that
12 it would require 'a few hundred transaction/event logs
13 to be provided during a full year', which has never
14 previously been raised with us, and Pathway does not
15 consider it to be a contractual requirement."

16 So do we understand there that the response from
17 Pathway at this time was effectively, as you've said
18 this afternoon, that it was a surprise to suddenly be
19 receiving a few hundred requests?

20 **A.** Well, and from a group of people that we'd never heard
21 of before.

22 **Q.** What was their job as far as you were aware?

23 **A.** National security team? I've no idea.

24 **Q.** There's a response, and I don't think we need to take
25 you to it but for the purposes of the transcript

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1 **A.** Hilary was referring to the regional internal audit
2 staff which she would have been dealing with, not POCL
3 security investigations, which were a different part of
4 the organisation.

5 **Q.** At some point did POCL security investigations become
6 heavily involved?

7 **A.** Only at this point here. I think that happened because
8 they suddenly realised they had lost FRMS.

9 **Q.** That's what we talked about at the very beginning?

10 **A.** Yes.

11 **Q.** At the bottom of this page:

12 "This tells me that POCL knew that they were
13 exposed as early as February 1999. The earlier
14 discussions during the Audit Panel meetings were held
15 with Fraud Risk Management, a separate part of Pathway
16 to Audit. Bob Martin's paid study was sponsored into
17 Pathway by Fraud Risk Management."

18 We've seen further correspondence, for the
19 purposes of the transcript FUJ00121102, but it seems to
20 crystallise in a letter of 22 February 2000 and I'm
21 going to take you to that. That is FUJ00121103.

22 This is a letter from Martyn Bennett to Keith
23 Baines. Can we scroll down slightly. I am just going
24 to read to you two short passages. The first is the
25 second paragraph, halfway through:

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1 FUJ00121104, and that's the response from the
2 Post Office that says it's a question of legal
3 interpretation and one for lawyers. I think you've seen
4 that document.

5 But I'm going to take you to FUJ00121105, please.

6 This is a letter from Martyn Bennett to Keith Baines and
7 appears to record a tentative agreement on the issue.

8 **A.** Yes.

9 **Q.** If we could scroll down, this is 24 May 2000. It seems
10 as though there's a tentative agreement:

11 "ICL Pathway will provide up to 50 audit data
12 extractions per annum for audit and security
13 investigation purposes with a maximum of seven in any
14 calendar month ...

15 "Any additional extractions will be charged for on
16 the basis that on average such extraction will take 1.5
17 man-days of senior consultant's time (at £1,299 per man
18 day) plus expenses. This we'll cover all work including
19 physical extraction of tapes at the Data Centre, loading
20 onto machines, rebuilding the Correspondence server as
21 necessary, searching for data, extraction and recording
22 on to appropriate medium."

23 Can you just tell us: why did it take so much time
24 to obtain this information to extract the data?

25 **A.** It was just a complicated system. I mean, if you go

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1 into the Horizon System audit manual, I think at about
2 section 10 there's a description of the audit system
3 including the retrieval activity. It was complex, and
4 I can't make any excuse for it being complex. It just
5 was complex and, as such, it took a lot of manual effort
6 to go through the process of identifying what -- well,
7 you had to interpret the RFI, you had to work out what
8 files were needed to service the RFI, because we didn't
9 have a standard catalogue of RFIs; it was more a case
10 of, "What do you want?"

11 We then had to interpret that to decide which
12 files we had to get in order to service the RFI, and
13 that meant that, when the Post Office got the data, they
14 might have to extract information from two or three
15 different sources on that data to get the information
16 they wanted.

17 So there was no single report came out by
18 extracting lots of different audit data files. So we
19 had to do that. We had to locate where they were on the
20 various Legato tapes which were the DLTs that we were
21 using to store the data on.

22 Then we had to liaise with the data centres to get
23 the tapes up and loaded onto the servers at the data
24 centres so that the audit work station at Feltham could
25 access them. There was only one audit work station in

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1 was some way back, was it?

2 **A.** Yes. I mean, BA dropped out of the contract in 1999,
3 I think, just as we were approaching acceptance. Of
4 course, when they dropped at all of their services
5 dropped out with them including the FRMS.

6 **Q.** Point 3 on this letter says:

7 "All requests for extractions will continue to be
8 channelled through ICL Pathway's audit manager who is
9 now Brian Mooney."

10 That suggests that by that stage, May 2000, you
11 had moved?

12 **A.** I'd moved on.

13 **Q.** Now, in your experience going forward from the date
14 especially from when you rejoined, were the Post Office
15 reluctant to obtain audit data?

16 **A.** I don't know, because the responsibility for delivering
17 that service had moved from audit to customer services.
18 Security had taken it under their umbrella, and security
19 at that time were working for customer services as part
20 of the live service delivery.

21 **Q.** Are you aware of that tentative agreement, whether that
22 was the final agreement, whether there was a similar
23 agreement?

24 **A.** No.

25 **Q.** Were you aware of a significant sum along those lines

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1 Feltham to work from, because that's all we felt we
2 needed, based on the original requirements.

3 It just took time.

4 **Q.** You told us earlier about a special fraud management
5 system that would have been implemented for the Benefits
6 Agency.

7 **A.** Yes.

8 **Q.** Is that what was missing in relation to the Post Office
9 agreement, some sort of automated system?

10 **A.** Well, I was under the impression, and having read
11 through some of the documentation, that the Post Office
12 were either planning to or were in some kind of
13 agreement with the Benefits Agency to make use of some
14 aspects of FRMS, because obviously if there were benefit
15 encashment issues going on, not only would the Benefits
16 Agency need to know, but also the Post Office would need
17 to know that there may have been collusion going on
18 between offices between postmasters and beneficiaries.
19 I don't know.

20 So I think there was some kind of fledgling
21 agreement going on to give the Post Office access to the
22 FRMS for certain types of data searching and information
23 retrieval, but I don't know.

24 Of course when that went, there was nothing.

25 **Q.** So the period of time you're talking about at the moment

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1 being charged for audit data?

2 **A.** No.

3 **Q.** So that was no longer part of your remit?

4 **A.** No, it was -- yes, it was no longer part of my remit.

5 **Q.** Can we go to FUJ00001419, please. Can I ask what this
6 document is.

7 **A.** The SADD. Not really. There was a lot of information
8 in there that I recognise but in terms of the SADD
9 itself ...

10 **Q.** You will be relieved to know I am not going to take
11 through the various complicated diagrams. I'm just
12 going to take you to page 4, please. This talks about
13 fraud risk management. Can we look at the bottom of
14 this page. It says:

15 "Pathway's strategy is to identify high-risk
16 situations and adapt systems as necessary to:

17 "Minimise fraud exposure within the Pathway
18 solution.

19 "Provide information service to POCL to aid fraud
20 investigation and to minimise fraud.

21 "The information provided is:

22 "Information to aid the investigation of actual
23 fraud incidents [and then over the page]

24 "Certification relevant to operation of the system
25 as required by PACE", et cetera.

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1 Then it's these two I am particularly interested
 2 in:
 3 "Information for the investigation of system
 4 boundary-related incidents and trends; for example,
 5 counter staff-related fraud with the aim of developing
 6 improved procedures.
 7 "Analysis of incidents and trends within Pathway's
 8 immediate control, to improve its systems."
 9 Was this something within your remit or was that
 10 outside?
 11 **A.** No, it was outside.
 12 **Q.** What I'd like to understand is were you aware of ICL
 13 Pathway having any proactive role in identifying
 14 high-risk situations, or providing analysis of incidents
 15 and trends relating to, for example, criminal
 16 prosecutions?
 17 **A.** No. I don't think I was. In fact, I wasn't.
 18 **Q.** You weren't aware? Do you think that they happened or
 19 didn't happen?
 20 **A.** I don't know. I wouldn't know.
 21 **Q.** We looked at the sophisticated tools that were proposed
 22 in that BA system, for example, the fraud risk
 23 management server. Do you think that the lack of
 24 analysis or the lack of a special system along the lines
 25 that the Benefits Agency had proposed was a missed
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1 **A.** Yes, I do know now that that was the case. At the time
 2 I didn't.
 3 **Q.** There was in this particular case a jointly appointed
 4 expert who produced a report that said that Horizon
 5 could have caused an error. Are you aware of that?
 6 **A.** Who was the expert?
 7 **Q.** If we scroll down, I think this document summarises the
 8 fact that there was an --
 9 **A.** Oh, are you talking about his --
 10 **Q.** Yes.
 11 **A.** Sorry, there was an expert.
 12 **Q.** And they produced a report that said that Horizon could
 13 have been responsible.
 14 **A.** Yes. They also accused us of sending incomplete data as
 15 well, but that's beside the point.
 16 **Q.** Can we look at page 4, please, and if we could scroll
 17 down. Can you tell thus purpose of this particular
 18 report.
 19 **A.** This was me just capturing the after-event story, if you
 20 like, because it actually proved to be a nonevent from
 21 our point of view. I actually got as far as the court
 22 house before it was cancelled, because there was an
 23 out-of-court settlement reached. So I felt it was
 24 appropriate to capture what had happened, because
 25 there's quite a lot of my time and the company's time
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1 opportunity?
 2 **A.** For the Post Office?
 3 **Q.** Yes.
 4 **A.** Well, yes, I guess anything that would improve their
 5 operation must be to their benefit. So, if they opted
 6 or chose not to do something that may have benefited
 7 from them, then I'm not sure what they would expect
 8 Pathway to do to fill in.
 9 **Q.** Were you ever aware of any serious analysis of incidents
 10 and trends arising from that kind of data taking place
 11 at ICL Pathway?
 12 **A.** No.
 13 **Q.** I'm going to move on to the Cleveleys case. Can we look
 14 at FUJ00080715, please. Now this was a document that
 15 you produced, and it's a report on Cleveleys
 16 Post Office. Do you recall that a subpostmistress was
 17 dismissed, I think, very early on November 2000?
 18 **A.** Yes. It didn't come to our attention for witness
 19 statements or support until 2004.
 20 **Q.** And that's something we will come to because obviously
 21 that's relevant for the retention of the audit data.
 22 **A.** Mm-hm.
 23 **Q.** Now, you would accept that, from what we've discussed
 24 this afternoon, in that period, so November 2000, there
 25 were undoubtedly issues with the Horizon System?
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1 had gone into supporting this prosecution, and it just
 2 disappeared.
 3 **Q.** If we look at Scope, it says:
 4 "This report does not set out to address the case
 5 itself, merely what POA have provided as support and
 6 some of the issues identified in providing that
 7 assistance. It does make recommendations as to how
 8 future involvement by POA in these non-standard cases
 9 might be better managed."
 10 Were you intentionally not going into the rights
 11 and wrongs of a particular case?
 12 **A.** I can't; I'm not qualified to do it.
 13 **Q.** Were you instructed to do this at all, to carry this out
 14 by anybody?
 15 **A.** Well, probably yes, I wouldn't have just done it, you
 16 know, voluntarily. I suspect I was probably instructed
 17 by Martyn to look after this, or perhaps security asked
 18 me to look at it.
 19 **Q.** Can we scroll down, please. There's a section there
 20 talking about the expert report. Could we keep on
 21 scrolling, please. Sorry, if we could just go up
 22 slightly. Thank you.
 23 At the bottom just above 3.2, it says there:
 24 "We have offered to host the expert at any of our
 25 locations so he can analyse [the] data directly, speak
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1 to the experts and a walk-through of the problem
 2 management cycle for himself. He will not have seen
 3 this offer since it was contained in the email that
 4 accompanied our final response, and this has not been
 5 passed on to the Expert pending an outcome of an
 6 out-of-court settlement offer by POL to the PM."

7 Then it's got an update there, I think, or
 8 1 April 2004:

9 "Confirmed with Jim Cruise that the recommended
 10 three months' salary offer is now with POL for
 11 approval."

12 Were you aware at the time that they were making
 13 the settlement offer?

14 **A.** I don't think I knew about that until we were in court,
 15 until I had actually turned up.

16 **Q.** If we could scroll down to the chronology, if we look
 17 that bottom entry there. It's 6 February 2004. It
 18 says:

19 "Nothing more was heard for almost six months
 20 until we received a letter from the Post Office
 21 containing the Expert's report. Post Office were
 22 concerned that the report claimed that the equipment
 23 installed at Cleveleys was defective and that the
 24 Horizon System Helpdesk was more concerned with closing
 25 calls than resolving problems. Post Office feared that,

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1 more:

2 "POA cannot prove, in the literal sense, that the
 3 system operated correctly during 2000 since we do not
 4 have the transaction data that will demonstrate that
 5 fact."

6 Just pausing there, you didn't have the
 7 transaction data, I think, because the 18-month period
 8 had passed; is that right?

9 **A.** Yes.

10 **Q.** As you said, you were only contacted after that period
 11 had expired about this particular case.

12 "Equally, any proving that we could do, for
 13 example, by design walkthroughs with the Expert, would
 14 prove nothing since it would be a 2004 system baseline
 15 that was being considered, not one from 2000. We can
 16 infer that it was since we are not aware of any
 17 contemporaneous POL prosecutions failing due to the
 18 system not operating correctly."

19 So was the feeling there that, because
 20 prosecutions hadn't previously failed, that would be
 21 sufficient to infer that there wasn't a problem?

22 **A.** I don't think that's an unreasonable position to take.
 23 You know, if there is no history of prosecutions of that
 24 type, there is nothing to suggest, to my mind anyway,
 25 that there would be a problem now.

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1 if the report went unchallenged, it could set a
 2 precedent for other cases being progressed against
 3 postmasters."

4 Is that something you remember at all, the fear or
 5 a precedent being set, for example?

6 **A.** I don't deny writing that chronology, and that
 7 Post Office fearing was probably a collective concern
 8 that was expressed by people like myself, Graham Hooper,
 9 who was the security manager, and possibly Martyn
 10 Bennett as well.

11 **Q.** I think it says there the Post Office feared that, if
 12 the report went unchallenged, it could set a precedent.
 13 Were you aware from the Post Office of those concerns?

14 **A.** Oh, I'm with you, yes. Sorry, I led you down a garden
 15 path there. Yes, if that's Post Office -- because I can
 16 understand we would be concerned at that as well, but
 17 that probably came through Jim Cruise.

18 **Q.** Do you remember it at all? Do you remember any fears
 19 being communicated to you about --

20 **A.** Not specific fears, no.

21 **Q.** I think it mentioned somewhere in this report but
 22 slightly higher up, that they hadn't previously found
 23 a problem, so that could be a basis for saying that the
 24 system was functioning sufficiently -- sorry, I don't
 25 have the paper copy of this one. If we go up a little

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1 **Q.** Looking at that and then turning the page to the bottom
 2 of the next page and that section that I took you to
 3 a moment ago about the fear of setting a precedent, is
 4 your recollection one of concern that a successful, or
 5 an unsuccessful case, in this particular case, the
 6 Cleveleys case, might set a precedent undermining future
 7 prosecutions?

8 **A.** I think, reading that now, that looks to me that it took
 9 six months before we received a copy from the
 10 Post Office containing the expert's report and, yes,
 11 you're right that Post Office, not Post Office account,
 12 and if they were concerned that the report claimed that
 13 the equipment was defective, then that could be seized
 14 by other people and said that, if it's defective there,
 15 it's defective elsewhere. If the Horizon system help
 16 desk was more concerned with closing calls and reserving
 17 problems, then that could be seized upon and used again.
 18 So the Post Office were looking for us to challenge that
 19 report, which we did.

20 **Q.** Can we go to the bottom of page 6, please. It's the
 21 final entry, 13 August 2004:

22 "Notified by POL that Post Office had made an
 23 increased offer to [the postmistress] to drop the case
 24 and this had been accepted. Not required in court."

25 We've seen a document -- I'll give you the

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1 reference but I don't think we need to go to. It's
 2 POL00090575 that says that the settlement was for
 3 £187,000 which included costs. Were you aware of the
 4 figure at all?
 5 **A.** No.
 6 **Q.** Were you aware -- I think you said that you only found
 7 out on the day about settlement. Did you go to court
 8 or --
 9 **A.** I did, yes.
 10 **Q.** Were you aware that it was a substantial figure?
 11 **A.** No.
 12 **Q.** Did anyone express any views as to how it was settled
 13 and --
 14 **A.** No, I'm quite frankly stunned at the amount because, at
 15 the end of the day, the lady removed the equipment from
 16 the office and refused to return it. So quite why she
 17 was getting compensation beats me.
 18 **SIR WYN WILLIAMS:** Well, if she had a claim for unfair
 19 dismissal, that's what the counterclaim was about.
 20 **MR BLAKE:** We know that shortly after this incident we have
 21 the Lee Castleton case. Was that case you were aware of
 22 at all?
 23 **A.** No.
 24 **Q.** Do you think this case was a missed opportunity in
 25 getting to the bottom of problems with Horizon?

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1 should be escalated to become a problem.
 2 "Introduce formal root cause analysis into problem
 3 and complaints management as a matter of course."
 4 If we go over the page, please, to the bottom
 5 there's discussion -- do you remember this -- about it
 6 not being easy to identify what constitutes a problem
 7 and when an incident becomes a problem. Is that
 8 something you remember at all?
 9 **A.** Yes, vaguely, yes.
 10 **Q.** There's the box after that on the next page, which says:
 11 "Although relatively trivial, the lack of guidance
 12 or definition can introduce uncertainty and the
 13 opportunity for 'problems' to be missed or unnecessarily
 14 escalated. It is recommended that [there's an update]
 15 to provide definition criteria and, if considered
 16 useful, examples."
 17 That's question that I'm asked to ask you is,
 18 whether you still looking back think that that was
 19 a trivial problem.
 20 **A.** The problem in itself wasn't trivial because, at the end
 21 of the day, there were some rules around it but they
 22 weren't formalised, as far as I recall. So formalising
 23 was a trivial bit. The actual escalation from an
 24 incident to a problem is not in itself trivial, because
 25 it generates a whole different set of actions. So

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1 **A.** What, Cleveleys?
 2 **Q.** Yes.
 3 **A.** Yes, I mean, possibly so, yes.
 4 **Q.** I've got a few small further topics to ask on behalf of
 5 Core Participants. Can we look at POL00089802, please.
 6 This is a November 2001 audit of customer service
 7 support processes. Can we look at page 4, please. This
 8 was written by you or originated from you.
 9 **A.** Yes.
 10 **Q.** Do you remember the purpose of this document?
 11 **A.** Well, it was an audit report, wasn't it?
 12 **Q.** What did it address?
 13 **A.** The processes that were being used by customer services
 14 as part of their role.
 15 **Q.** Can we go to page 5, please, and there's an overall
 16 opinion there. Can we scroll down a little bit. Thank
 17 you very much. I'm just going to read that first couple
 18 there. It says:
 19 "There are a number of relatively minor issues
 20 that, while not impairing the current management of
 21 incidents and problems, could, if accepted and
 22 addressed, improve the performance of this part of CS."
 23 CS being customer support --
 24 **A.** Customer services.
 25 **Q.** "Provide a definition and guidance for when an incident

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1 I think what I may have been referring to as trivial is
 2 the lack of guidance.
 3 **Q.** Thank you. We can take that down, thank you.
 4 I've got a question about the help desk. At
 5 paragraph 11B of your statement you point to two
 6 documents which set out the adequacy or otherwise of the
 7 help desk. We're going to explore this in a lot more
 8 detail during Phase 3, but can you tell us your broad
 9 views about how effective the help desk was, please.
 10 **A.** Which help desk? Sorry, I'm saying that because there
 11 are a number of different levels of help desks. There
 12 were the help desks that sat within the Post Office
 13 environment that were looking after advice and guidance,
 14 because that was all being handled at one time by the
 15 Horizon System help desk and then it got separated out.
 16 I think that might be what the EDSC was about. That was
 17 up in Barnsley, I think, because I went up there once
 18 for a visit.
 19 The Horizon System help desk was then the next
 20 level. But, I mean, I didn't have a particular view on
 21 it. It was there to fulfil a function. Again I did
 22 visit and it was split over two sites. I did visit both
 23 sites as part of an audit, but it seemed to be
 24 functioning in the sense of calls being handled and
 25 sufficient manpower to do the work. The audit didn't

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1 involve going in to look at specific calls and saying,
 2 "You handled that well", or, "You didn't handle that
 3 well." That's not what the nature of the audit was.
 4 **Q.** Finally, as someone who audited the system and was
 5 involved in discussions about retention periods and the
 6 provision of data for prosecutions, what is your view
 7 about the Post Office relying on Horizon data to
 8 prosecute people?
 9 **A.** Well, in the olden days, I guess, when the Post Office
 10 had paper records in the outlet, they would rely on
 11 those records to prove guilt or otherwise -- not guilt,
 12 sorry, to prove that something was going on or not.
 13 Those paper records disappeared when Horizon came on the
 14 scene. So they had to place reliance on Horizon data
 15 then, to carry at those investigations and to make the
 16 necessary prosecutions, if that's what they wanted to
 17 do.
 18 So they had no option but to rely on the Horizon
 19 data.
 20 **Q.** Knowing what you know about problems with Horizon data,
 21 what is your opinion?
 22 **A.** Well, they still had no option. Yes, I mean, what's
 23 happened is disastrous, it's very bad, but at the time
 24 it wasn't known and, you know, I'm not sure what I can
 25 say to that.

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1 distributed in a controlled environment.
 2 **Q.** You had identified problems with Horizon data in 1998
 3 and 1999 to management within ICL, and you were aware
 4 and management were aware that there was a dramatic
 5 increase in requests for data from the Post Office. Do
 6 you think somebody should have put those two together?
 7 **A.** Sorry. When you say we were aware that there were
 8 problems with the data?
 9 **Q.** Well, for example, the EPOSS PinICL Task Force and the
 10 various reports I took you to first thing today
 11 identified that there were underlying system issues.
 12 There was severe criticism from -- we've heard from
 13 Mr McDonnell, for example. Do you think somebody,
 14 I don't know who, and you can perhaps tell us who should
 15 have put those two things together?
 16 **A.** No. I can't offer a name or a group who might have done
 17 that.
 18 **Q.** You may not be able to offer a name or a group who might
 19 have done that but who should have done that?
 20 **A.** Within Pathway?
 21 **Q.** Yes.
 22 **A.** I really don't know. I really don't know.
 23 **MR BLAKE:** Thank you very much, Mr Holmes. I don't have any
 24 further questions. There may be some questions from
 25 other Core Participants. Mr Henry looks like he is

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1 **Q.** When you say it wasn't known, it was known --
 2 **A.** It wasn't known to me; let's put it that way. Whether
 3 it was known elsewhere, I don't know.
 4 **Q.** When you say it wasn't known, you mean nobody connected
 5 the prosecutions with the problems with the Horizon
 6 System, or was the something else that wasn't known?
 7 **A.** No, as I alluded to earlier, I would have expected the
 8 Post Office to have made that connection somehow,
 9 because we sort of couldn't. All we could do is, we
 10 were taking requests for data. We didn't know what they
 11 were doing with it. They never said, "This data is
 12 required for a potential prosecution." It was just,
 13 "This data is required." So we didn't know what they
 14 were doing with it.
 15 They did and, you know, I think it was beholden on
 16 them to have been, I don't know, more careful -- is that
 17 the right term -- but to be, you know, had a duty of
 18 care to make sure they were using that data in an
 19 appropriate manner, and that it was correct, which
 20 sounds odd because you might think that was our job to
 21 make sure that's correct. What we were able to do was
 22 demonstrate that we collected what was sent to be
 23 collected. We stored it securely. When we retrieved
 24 it, we proved that we'd stored it correctly by
 25 recalculating checks and seals, and it was extracted and

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1 consulting his papers.
 2 **SIR WYN WILLIAMS:** No, he has no questions.
 3 **Questioned by MR HENRY**
 4 **MR HENRY:** Thank you, sir.
 5 Mr Holmes, would you please be kind enough to look
 6 at FUJ00080690, one of the areas on which I have been
 7 permitted to ask you some questions. We can see, if we
 8 may, over the page at page 2 -- thank you very much,
 9 Document History, 18 September '98, Initial Draft
 10 Following Task Force Completion. This was written with
 11 Mr McDonnell, wasn't it?
 12 **A.** Yes, that's right.
 13 **Q.** Then 14 May '01 raised to V1 or V1.0 administrative
 14 catch up?
 15 **A.** It's V1. Yes, I think that was just me.
 16 **Q.** That was you because you were back by that time because,
 17 although you had left, you came back in 2001?
 18 **A.** Yes, actually I did, but it was after this date. So I'm
 19 struggling now ...
 20 **Q.** Because you had gone to a Prosell or something?
 21 **A.** I'd gone to Propel and then I'd come back after about
 22 a year because that programme collapsed.
 23 **Q.** Absolutely, as you stated in paragraph 3 of your
 24 statement. Could we go to page 4 of 20, please, and
 25 could we go to Management Summary, please. We can see

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1 just above that in Scope that we're dealing with
 2 a period there of EPOSS between 19 August and
 3 18 September, and that of course would have been in
 4 1998.

5 **A.** Yes.

6 **Q.** Then we have the Management Summary which -- let's take
 7 that as read. Could we go to page 7 of 20, please, and
 8 we can see there:

9 "It is clear that senior members of the Task Force
 10 are extremely concerned about the quality of code in the
 11 EPOSS product", et cetera.

12 Then over the page to 8 of 20, please and at 4.2
 13 we can see at letters a to f that the PinICL stacks in
 14 relation to this concerning EPOSS have been divided into
 15 six separate pots.

16 **A.** Yes.

17 **Q.** So no doubt that was in order to sort of track the
 18 matter chronologically, but also it was there because
 19 perhaps you were, for example, doing a holding stack
 20 while fix activity was underway, post fix but pre-link
 21 test.

22 **A.** Yes. That was to allow us to do a bit better analysis
 23 of where these PinICLs were in the fix cycle because --
 24 sorry -- don't forget that this was an extra piece of
 25 work that was sitting on top of the existing activity

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1 for this, but address matters as to who was going to pay
 2 for RFIs in the event of prosecutions. We've seen
 3 a document put up on screen by Mr Blake that Mr Martyn
 4 was suggesting that there might be a few hundred per
 5 annum.

6 **A.** Mm-hm.

7 **Q.** You expected, you said, POCL to query the upsurge
 8 themselves.

9 **A.** I would have thought that was a prudent thing to do.

10 **Q.** You were asked by Mr Blake, "Did you ever ask POCL why
 11 there was this sudden increase", and then you said,
 12 "I suppose we should have asked why this increase in
 13 numbers." Do you remember saying that?

14 **A.** Yes, yes.

15 **Q.** You said to Mr Blake a very short while ago that the
 16 Post Office really had no option but to use Horizon in
 17 the prosecution of its subpostmasters.

18 **A.** Based on my understanding that the evidence of
 19 activities in the outlet was captured by the system,
 20 yes.

21 **Q.** So, therefore, if it was demonstrated to be manifestly
 22 unreliable in certain respects, and it might only have
 23 been 1 per cent or a fraction of 1 per cent, this whole
 24 edifice would have come down in an enormous crash,
 25 wouldn't it?

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1 that was going on. So, while the Task Force was looking
 2 at this wedge of PinICLs, EPOSS was still going on in
 3 the background. That was the point that Dave made this
 4 morning.

5 **Q.** Of course.

6 **A.** So we were trying to empty the swamp while the tap was
 7 still on at the top, and it was a virtually impossible
 8 task.

9 **Q.** Exactly, exactly. That's why I want to ask you why
 10 you're coming back to these on 14 May 2001.

11 **A.** It was just an admin clear-up, I think, of documents
 12 that were still sat at draft.

13 **Q.** You see, because it coincides exactly with the date of
 14 a Post Office board meeting on the very same day,
 15 14 May 2001, RMG00000009, which speaks of error, that's
 16 error reconciliation activity, and Horizon Issues.

17 Was this report of yours with its dismal
 18 observations on EPOSS retrieved because of information
 19 that had been received from the Post Office at that
 20 time?

21 **A.** Not to my knowledge, no.

22 **Q.** So the coincidence in this case --

23 **A.** It is coincidence.

24 **Q.** Just a coincidence, right. Could I just ask you,
 25 please, to address matters -- again I have permission

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1 **A.** If that was the case, then yes, I guess it would have
 2 done.

3 **Q.** Of course it would, because obviously it would have been
 4 a matter of legitimate public interest. So what I'm
 5 going to suggest is that, whether you were sighted on
 6 this or not, it was not in ICL Fujitsu's best interests
 7 to ask that question, was it?

8 **A.** Well, that's an interesting one, as you might expect me
 9 to say. Was it in our best interest to ask about the
 10 integrity of the system as demonstrated by the high
 11 number of prosecutions that were going on? I don't even
 12 know how many prosecutions were going on. But the high
 13 number of investigation requests that were being floated
 14 by Bob Martin suggests that there was a lot going on in
 15 the background that we didn't know about.

16 Would it have been in our best interests?
 17 I guess, in the interests of honesty and integrity, then
 18 yes, it would be.

19 **Q.** It would have been disastrous reputationally for
 20 everyone concerned; even if it was only 1 per cent or
 21 a fraction of 1 per cent, your system was manifestly
 22 unreliable.

23 **A.** Well, yes, it would be, yes.

24 **Q.** We can if we need to -- the counsel to the Inquiry have
 25 been notified about various documents, but a defensive

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1 attitude, you would agree, has been adopted or was
 2 adopted by ICL in respect of criticisms of Horizon?
 3 **A.** Where was that evidenced?
 4 **Q.** Well, I mean, for example, in the Cleveleys issue where
 5 you were, as it were, deriding the opinions of the
 6 expert on behalf of the subpostmistress in various
 7 negotiations with POCL. There was a defensive attitude
 8 as to system error and unreliability, wasn't there?
 9 **A.** Can we get that document back up, please. I'm not happy
 10 with that.
 11 **SIR WYN WILLIAMS:** Well, I think the document speaks for
 12 itself, Mr Henry.
 13 **MR HENRY:** Yes, it does.
 14 **SIR WYN WILLIAMS:** I can read what it says.
 15 **A.** Yes, but I'm not happy of the implications of what the
 16 gentleman was saying.
 17 **SIR WYN WILLIAMS:** I think Mr Henry is referring to one part
 18 which stuck in my mind where criticisms -- I'm using
 19 that word in the general sense -- were being made of the
 20 quality of the expert evidence. That's it, isn't it?
 21 **MR HENRY:** That's right, sir.
 22 **A.** I'm sorry to carp on about this.
 23 **SIR WYN WILLIAMS:** Bring it up then. Bring up the document.
 24 **A.** I don't think it's warranted --
 25 *(Unclear: simultaneous speakers)*

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1 roughly it was going to be about 200 a year.
 2 **A.** Mm-hm.
 3 **Q.** Eventually on 24 May 2000 a compromise was reached, that
 4 50 queries would fall within the contract and then
 5 everything else it would cost about £1,500 per day; do
 6 you remember?
 7 **A.** Yes, I've seen the letters.
 8 **Q.** When that matter came to trial, Ms Felstead's trial,
 9 a request was made by your company, that you then worked
 10 for, for £20,000 of the defence for Ms Felstead in
 11 relation to the provision of information. That wouldn't
 12 surprise you in the light of what had happened, would
 13 it?
 14 **A.** When did this happen?
 15 **Q.** That happened -- well, she went to prison in
 16 August 2002. So I'm referring to the period of
 17 obviously between May 2000 and August 2002. May 2000
 18 the agreement, prosecution in 2001-2002, sent to prison
 19 August 2002. That wouldn't surprise you, would it?
 20 **A.** Look, I'm not trying to duck the issue, but I wasn't on
 21 the project then and when I came back, it wasn't my area
 22 to be responsible for.
 23 **Q.** You came back, however, in 2001?
 24 **A.** Yes, but it didn't -- the role then didn't include the
 25 provision of audit data to the Post Office. That had

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1 **SIR WYN WILLIAMS:** I don't think it's being suggested or I'm
 2 not suggesting it, if you think I am, that you were
 3 making up those criticisms.
 4 **A.** No, I just didn't like the tone.
 5 **SIR WYN WILLIAMS:** Oh, I see. All right.
 6 **MR HENRY:** I don't need to go to it, sir, in the light of
 7 your supervisions. It is only if the gentleman would
 8 like to.
 9 **SIR WYN WILLIAMS:** I got the point you are both making.
 10 Let's put it like that.
 11 **MR HENRY:** I just want to return to that document that you,
 12 as it were, had an administrative catch up about very
 13 quickly -- no need to put it on the screen --
 14 14 May 2001, because, very shortly or contemporaneously
 15 with that, one of the Core Participants I represent fell
 16 under suspicion, was subsequently prosecuted and went to
 17 prison the following year, a 19-year old girl sent to
 18 Holloway.
 19 Dealing with requests for unused material or
 20 material RFIs, as you say, you were expressing concern
 21 about "dodgy postmasters", and I realise that you --
 22 **A.** An unfortunate term.
 23 **Q.** Of course, I don't refer to that pejoratively. You have
 24 apologised for the terminology. It was your
 25 understanding at the time. But you were told that

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1 been passed to customer services.
 2 **Q.** I see. So, if that wasn't your role, why are you
 3 therefore retrieving that report that I put to you that
 4 very beginning of my questions?
 5 **A.** Cleveleys?
 6 **Q.** Not Cleveleys. I'm talking about Ms Felstead, talking
 7 about, if that wasn't your role, why were you as an
 8 administrative catch-up, referring to a report that you
 9 and Mr McDonnell had written in 1998 in May 2001?
 10 **A.** It was just that an administrative catch-up; that was
 11 all. There was nothing -- there's nothing -- no
 12 ulterior motive behind doing that.
 13 **Q.** What I want to suggest to you is that clearly, obviously
 14 the problems in EPOSS hadn't gone away, which is why you
 15 were pulling up that report for administrative catch-up
 16 on 14 May 2001.
 17 **A.** That's just raising it to version 1 from --
 18 **Q.** Sorry?
 19 **A.** That was just raising it to version 1 from version 0.1.
 20 There was no change to content.
 21 **Q.** I see.
 22 **A.** I'm sorry, I'm not quite sure what point you are trying
 23 to get at here.
 24 **Q.** What I am trying to say is obviously the problems with
 25 EPOSS referred to therein had not been solved.

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1 A. Clearly not.

2 Q. Yes. I'm grateful. Could I ask you please to just

3 consider this. You may not have been familiar. I mean,

4 obviously you mention in your statement that this was

5 a massive exercise, and it was the largest nonmilitary

6 exercise in IT in Europe at that time.

7 A. I believe so, yes.

8 Q. Mr Martin is asking for about 200 cases a year. There

9 were 19,000 post offices roughly at about that time.

10 1 per cent by my 'O' Level Maths would come to 190,

11 wouldn't it?

12 A. Yes.

13 Q. So you think that reflects upon, as it were, the

14 percentage error that was clearly by that stage

15 unresolved?

16 A. I'm sorry, I'm not following you.

17 Q. Well, the system bugs, errors and defects.

18 A. What's the number of post offices got to do with that?

19 Q. Well, just the fact that, if you have a 1 per cent error

20 rate, you have got 19,000 post offices, you might get

21 190 referrals per annum for that reason.

22 A. But the requirements for the retrieval process were

23 based on what we were told at the time by the Post

24 Office Internal Audit and the BA internal audit who were

25 the authorised users of audit data. Bob Martin's group

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1 A. No.

2 Q. No. And Mr Austin, your friend, appointed you?

3 A. Yes.

4 Q. At the time, Mr Gareth Jenkins was your go-to guy for

5 things that were technical?

6 A. If I wanted to know something, yes.

7 Q. He doesn't appear to be that visible or prominent in the

8 materials that were provided to you or the Inquiry. Can

9 you think of any reason for that?

10 A. No, not really. I mean, my involvement with Gareth was

11 when I wanted it.

12 Q. Could I ask you please, in conclusion, to go to

13 FUJ00078284 and could we please go to page 23 of 32.

14 I just observe it's December 1998 and the date is

15 15 January 1998, but I think that must be '99 -- that

16 there was a typo there but it's immaterial. Can we go

17 to "live trials":

18 "Deliverables for live trials [et cetera,

19 et cetera] high level document extraction and filter

20 document produced by Michelle Myles ..."

21 You, sir, are mentioned. I'm not sure if you

22 actually saw this:

23 "... who specified the requirements for audit has

24 confirmed that he does not have a requirement for GUI

25 interfaces to any of these tools. He only requires

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1 were not on the horizon at all. I mean, you are

2 probably not wrong in your 190 but, at the time when we

3 were putting together the requirements and specifying

4 the system, it was based on what the customer said they

5 wanted.

6 Q. Or not necessarily -- and this is my final question,

7 sir, and again it's a matter upon which you or counsel

8 to the Inquiry has given permission -- not necessarily

9 what the customer wanted, and I'm now moving to another

10 subject, but what you were prepared to give them. In

11 other words, an expert who could, as it were, give

12 a sort of declaratory statement that the system was

13 working properly. "If you want to check it, it's going

14 to cost you this amount of money", but essentially

15 somebody like Mr Jenkins to come and, as it were, speak

16 in a lapidary fashion that there's nothing wrong with

17 this.

18 A. I can't answer to that, can I? It's nothing to do with

19 me. I wasn't involved.

20 **SIR WYN WILLIAMS:** I think that is a very long comment, not

21 a question, Mr Henry.

22 **MR HENRY:** Forgive me, sir. Final issue, sir, final issue,

23 and I promise you this and I thank you for your

24 indulgence.

25 You are not a techy, sir?

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1 batch tools. He may at a later date, after the process

2 has been used for some time, ask for such enhancements.

3 However, it was agreed at a meeting [et cetera,

4 et cetera] that the requirement for GUI interfaces would

5 remain ..." et cetera, et cetera.

6 Can you now remember what "GUI" stands for?

7 A. Graphic user interface.

8 Q. Exactly. They are more user friendly for the user

9 aren't they?

10 A. Yes, they are if you're going to start looking at the

11 data and whacking it up on your screen, so you can get

12 an immediate feed of what that data is telling you off

13 the record.

14 Q. Absolutely, and was this for the end user, a GUI

15 interface for the end user, i.e. the subpostmaster, or

16 for somebody doing your audit?

17 A. No, the subpostmaster would not have access to this

18 data.

19 Q. So, in other words, the GUI which would have been --

20 allow you to get up more data, allow you to see it more

21 clearly, be more analytical, that was, as it were,

22 dismissed in preference for a much less sensitive batch

23 tool?

24 A. Because that was what was needed at the time. That was

25 what was being -- that was what we were told was

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1 required at the time.

2 **Q.** I see. But in view of the first -- in view of the

3 answer you gave me, GUI would have been more sensitive

4 to detecting bugs, errors and defects, wouldn't it?

5 **A.** No, it would have just made the data easier to read on

6 the screen, that's all. I mean, the data -- sorry, the

7 data is still there. It's up to the users of the data

8 to investigate and interpret it.

9 **MR HENRY:** Well, thank you very, very much. Nothing

10 further, sir. Thank you.

11 **SIR WYN WILLIAMS:** Thank you. Anyone else?

12 Mr Holmes, during the course of answers you gave

13 to Mr Blake, I got the impression -- and if I'm wrong,

14 please correct me -- that you've retained some of the

15 documents over all these years.

16 **A.** Yes, I have.

17 **SIR WYN WILLIAMS:** Have you retained any of your witness

18 statements you've made?

19 **A.** Probably in the midst of the archive, yes.

20 **SIR WYN WILLIAMS:** I was going to ask you, if you would

21 please, to dig them out and send them to the Inquiry.

22 **A.** Yes, I'll do that.

23 **SIR WYN WILLIAMS:** We'll send you a formal letter to the

24 effect, all right.

25 **A.** Who do I send it to?

1 **SIR WYN WILLIAMS:** Oh, you'll be given the details.

2 **A.** Oh, all right, fine. Yes. I can dig out what I've

3 still got.

4 **SIR WYN WILLIAMS:** Yes, that's good. Thanks very much.

5 Thank you very much for your witness statement and thank

6 you for coming to give evidence to the Inquiry.

7 **A.** You're welcome.

8 **SIR WYN WILLIAMS:** Is that it, Mr Blake?

9 **MR BLAKE:** That is, sir. We have Mr Cipione returning

10 tomorrow at 10.00.

11 **SIR WYN WILLIAMS:** Jolly good. So 10.00 tomorrow morning it

12 is.

13 (4.22 pm)

14 (Adjourned until 10.00 am the following day)

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