

Thursday, 9 March 2023

1
2 (9.58 am)
3 MR BEER: Sir, good morning can you see and hear me?
4 SIR WYN WILLIAMS: Yes, thank you very much.
5 MR BEER: Can you see Mr Roll?
6 SIR WYN WILLIAMS: Yes, I can.
7 MR BEER: May I therefore call Richard Roll, please.
8 SIR WYN WILLIAMS: Yes.
9 RICHARD WILLIAM ROLL (affirmed)
10 Questioned by MR BEER
11 MR BEER: Good morning, Mr Roll. Can you see and hear me
12 clearly?
13 A. Yes, thank you.
14 Q. As you know, my name is Jason Beer and I ask questions
15 on behalf of the Inquiry. Can you give us your full
16 name, please?
17 A. Richard William Roll.
18 Q. Can I extend the Inquiry's thanks for the provision of
19 a witness statement by you and for attending to give
20 evidence remotely today. You should have in front of
21 you a pack of hard copy documents, the first of which,
22 at tab A, is a witness statement you made on 2 February
23 this year. It's 18 pages long. Can I invite you to
24 open that and confirm that that is your witness
25 statement.

1

1 Q. I'm not going to ask you questions about what the Post
2 Office did in relation to and in response to your
3 appearance on Panorama in 2015, nor am I going to ask
4 you questions about the basis of many of the suggestions
5 that were put to you over the course of a day and
6 a half's cross-examination on 13 and 14 March 2019 when
7 you appeared as a witness in the *Bates v Post Office*
8 trial in the High Court, just down the road from here,
9 and nor am I going to ask you questions about the
10 treatment more generally of your evidence by the Post
11 Office in the trial, nor the conclusions that Mr Justice
12 Fraser drew about the accuracy and reliable of your
13 evidence. Do you understand?
14 A. Yes.
15 Q. All of those issues or some of them may be examined
16 later in the Inquiry but we do not need your evidence in
17 order to examine them. So can I start, then, with your
18 background and experience. As we've just established,
19 I think, you joined the RAF in 1976; is that right?
20 A. That's right.
21 Q. In one of your statements prepared for the *Bates*
22 litigation, you say that your title in the RAF was
23 avionics engineer; is that right?
24 A. Yes.
25 Q. You tell us in that statement that you worked on

3

1 A. Yes, it is.
2 Q. For the Inquiry's reference, the URN for that is
3 WITN00780100. Can you turn to the 15th page of it,
4 please.
5 A. Yes.
6 Q. Is that your signature?
7 A. It is.
8 Q. Then if you turn back to the first page, to the first
9 line, where it says, "I joined the RAF in 1974", should
10 that read "1976"?
11 A. It should.
12 Q. Other than that correction, are the contents of the
13 witness statement true to the best of your knowledge and
14 belief.
15 A. Yes.
16 Q. Thank you. I am going to ask you some questions today
17 about issues that the Inquiry has grouped together in
18 what we call Phase 3 of the Inquiry, namely your role in
19 the operation of the Horizon System and the work of the
20 SSC, which is variously described in Fujitsu documents
21 and the Post Office as the System Service Centre, the
22 System Support Centre or the Software Support Centre.
23 They're all referring to the same thing and I'm going to
24 call it the SSC today. You understand?
25 A. Yes.

2

1 a variety of mainframe computer systems and that you
2 were selected for a software development team working on
3 aircraft control and attack systems; is that right?
4 A. Broadly speaking, yes.
5 Q. I think it's right that, in your time in the RAF, you
6 obtained a City & Guilds Level 3 certificate in
7 electronics?
8 A. Yes.
9 Q. You obtained an ONC in electronics engineering --
10 A. Yes.
11 Q. -- and you obtained an HNC in software engineering?
12 A. I did all of the modules for that and got distinctions
13 and credits but I never completed the final module so
14 I never actually obtained the final HNC.
15 Q. I understand, thank you for that clarification. Then
16 after 14 years or so in the RAF in 1989 you left; is
17 that right?
18 A. That's right.
19 Q. Over the next 12 years or so you undertook a range of
20 work, including, I think, bringing up some children on
21 your own before joining Fujitsu in January 2001?
22 A. Yes.
23 Q. Can we just look at page 17 of your witness statement.
24 It will come up on the screen or you can follow in the
25 hard copy. Page 17, please. Ah. That seems to have

4

1 been redacted. Is it redacted in the copy that you've
 2 got?
 3 **A.** Um, which page am I looking at? Page 17 on my witness
 4 statement?
 5 **Q.** Yes, the second page of your CV.
 6 **A.** Oh, right, yes. I've got it in front of me here.
 7 **Q.** You've got it in front of you?
 8 **A.** Yes.
 9 **Q.** Okay. I think you, working from the bottom upwards --
 10 we can take that down from the screen, thank you --
 11 working from the bottom upwards, the first job after the
 12 RAF, was that working in robotics, essentially?
 13 **A.** Yes.
 14 **Q.** Then the job above that, between August 1990 and March
 15 1991, was that software development?
 16 **A.** Software support to development yes, we were rolling out
 17 a product in the UK and some of it had to be modified as
 18 it went along for the UK customers.
 19 **Q.** Then May '91 to December '92, business process analyst.
 20 What was that?
 21 **A.** The company, new information paradigms, it was
 22 pre-Internet. They had a product which could
 23 interrogate databases, such as Reuters, some of the
 24 online financial databases, et cetera. It could access
 25 those overnight, download the information, format it,

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1 responsible for configuring desktop computers,
 2 installing them, building them from scratch in some
 3 cases, training people on the software that was being
 4 used on them, so on and so forth.
 5 **Q.** Then for the same company you worked as a systems
 6 procurement analyst. Can you explain what that is,
 7 please?
 8 **A.** Yeah, the -- they then needed someone again, through TAL
 9 to work. There was a problem on the Glaxo recession
 10 development site and they weren't getting the equipment
 11 they needed and the software and hardware they needed to
 12 be able to process the data, get the drugs to market,
 13 basically. They needed someone else there to help speed
 14 up the process.
 15 So I was asked to step in and help with purchasing,
 16 analysing what equipment they needed, what desktops,
 17 what processing power was best for their needs. So then
 18 I would then source the -- source the equipment and get
 19 the purchasing done to get it onto the desks as quickly
 20 as possible.
 21 **Q.** Then after that, between January and December 1996 you
 22 worked in the same company again as a project manager;
 23 is that right?
 24 **A.** Yes, they -- Glaxo merged with Wellcome at that time, so
 25 there was a lot of staff. At Dartford we had a lot of

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1 and print a document so that in the morning you would
 2 have an up-to-date management report on what the
 3 competitors were doing, et cetera. At the time, it was
 4 all cutting edge stuff. It was written in language very
 5 much like HTML is today but, as I say, predated the
 6 Internet by several years.
 7 **Q.** Thank you. Then for two and a half years, as I've said,
 8 you worked looking after your children?
 9 **A.** Yes, I tended to do odd jobs for -- I worked for the
 10 Natural History Museum on a database project in the
 11 evenings from home. I took the children to school
 12 during the day, picked them up from school, get them to
 13 bed and then I'd work until 2.00 in the morning or so on
 14 the database projects and then get some sleep, get them
 15 to school in the morning, couple more hours sleep, get
 16 up at lunchtime, do the housework, et cetera --
 17 **Q.** I see.
 18 **A.** -- pick up the kids. Then.
 19 **Q.** Then between June '95 and July '95 you were a desktop
 20 implementation engineer, what does that mean?
 21 **A.** That was the title. There was a company called TAL,
 22 again it was really when IT was still taking off, as it
 23 were. It had been set up by a previous employee at
 24 Glaxo to manage or help manage Glaxo's IT systems. He
 25 then contracted into them, if you like. So we were

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1 data, a lot of systems, they needed bringing in line
 2 with Glaxo equipment. Some of the staff were made
 3 redundant, the rest were being transferred to another
 4 site.
 5 **Q.** Then towards the top of the page there two jobs, firstly
 6 as a systems manager and then as a project manager.
 7 **A.** Yes.
 8 **Q.** Did any of that involve work with software, or writing
 9 software or coding?
 10 **A.** The job with at CRO Catalyst, I was responsible for
 11 looking after all the software in the UK and Europe, so
 12 that involved configuring software on the servers in the
 13 Hague, also in Switzerland and the UK. That was more
 14 setting up software rather than coding or writing it.
 15 **Q.** Thank you. Then at the foot of the preceding page, in
 16 early '99 and then for the rest of '99 and to the middle
 17 of June 2000, a configuration centre manager and then
 18 a system support analyst. Can you describe what those
 19 jobs were, please?
 20 **A.** Yeah, sure. The configuration centre manager, Bitech
 21 had a large facility in Bracknell, configuring IBM
 22 minicomputers, setting up software, et cetera. They
 23 were moving the whole process to Germany and closing
 24 down the UK facility. My manager in the UK had moved
 25 out to Germany and they needed someone else to step in

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1 while they closed the rest of the facility down in the
 2 UK. So I took it over for that period, for a short
 3 period of time, to run it whilst they moved most of the
 4 stuff out --

5 **Q.** And the system support analyst?

6 **A.** That was running a third, if you like, of the global
 7 sales database software. I was responsible for managing
 8 the software in Egypt, Greece, Tunisia, the
 9 Middle Eastern areas, part of Africa, most of Europe,
 10 most of Eastern Europe. That involved writing code --
 11 I'm trying to remember exactly what the terms were.
 12 Basically, the sales reps would input the data in their
 13 various countries. That would then be consolidated into
 14 a database in the UK. That was an Oracle Database,
 15 I think.

16 So I had to manage the Oracle Database, also write
 17 the scripts to interrogate the database, so that the
 18 sales reports were generated correctly. There were
 19 often issues with data coming in from various countries
 20 that would be out of sync, so that all had to be sorted
 21 out, turn the database off, go in, sort the code out,
 22 sort the actual records out, put it all back together,
 23 and then resync it with the databases in Greece,
 24 Romania, wherever.

25 **Q.** I understand. Thank you. Then I think you took up

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1 Bracknell. By that, were you meaning they were all in
 2 the SSC?

3 **A.** Not all of them. Some of them would have been in the
 4 testing team. Probably -- I think there were 25 to 30
 5 SSC members and half a dozen or more people in testing.

6 **Q.** Thank you. So that 25 to 30, were they all doing the
 7 same or substantially the same job as you?

8 **A.** Substantially the same job as me, yes.

9 **Q.** Did you manage anyone?

10 **A.** No.

11 **Q.** How many managers were there of the SSC?

12 **A.** Just one, as far as I can recall.

13 **Q.** Who was the manager of the SSC?

14 **A.** Mik Peach.

15 **Q.** Did he have a deputy?

16 **A.** Um, Steve Parker stood in for him when he wasn't there,
 17 yeah.

18 **Q.** What was the structure of the team? How were the 25 to
 19 30 of you, other than Mr Parker and Mr Peach, arranged
 20 or organised, if you can remember?

21 **A.** It was a very flat management structure. We just all
 22 reported to Mik Peach. Physically on the floor, we had
 23 own little desk space with two computers on it. One was
 24 completely secure and that was connected to the Horizon
 25 System, and the other one was an open system, for want

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1 employment for a period of three years and six months
 2 between January 2001 and August 2004 with Fujitsu?

3 **A.** Yes.

4 **Q.** The job title that I've seen for you was IT product
 5 specialist; is that right?

6 **A.** I think so, yes.

7 **Q.** You worked in third and fourth line support in the SSC;
 8 is that right?

9 **A.** Yes. I think now that that -- it was probably classed
 10 more as third line support. There was some development
 11 but probably technically -- probably better described as
 12 third line support.

13 **Q.** Thank you. Was your work focused almost exclusively,
 14 therefore, on the investigation and resolution of issues
 15 and problems with the Horizon System?

16 **A.** Yes.

17 **Q.** Did that involve you dealing directly with
 18 subpostmasters and others employed in branches?

19 **A.** Yes.

20 **Q.** You were, I think, based at the Fujitsu offices in
 21 Bracknell for the entirety of that period?

22 **A.** Yes.

23 **Q.** Can I ask about the size of the SSC team. In one of
 24 your statements, you say that there were over
 25 30 individuals working on the same floor as you in

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1 of a better way of putting it, where we could send
 2 emails, look up things on the Internet if necessary.
 3 That sort of thing.

4 **Q.** So a flat structure, all reporting in to Mr Peach, no
 5 hierarchy within the 25 to 30 of you?

6 **A.** No, not that I remember.

7 **Q.** Was there any division in terms of specialism amongst
 8 you, in terms of the work that was undertaken?

9 **A.** Um, yeah, some of the guys there had been working with
 10 Unix systems since the year dot, so they were, you know,
 11 real experts on Unix. So only knew if there was
 12 a problem with the server farm, they would pick up those
 13 problems as some of them were very, very good on the
 14 financial side of things, mathematics and that, so they
 15 tended to pick up any work that came on, and that sort
 16 of thing. Some of us were just sort of generalists who
 17 would dive in and do anything we could and, if we got
 18 stuck, then we knew who we'd perhaps go and ask for
 19 a bit of help.

20 **Q.** Thank you very much. I want to ask how you came to give
 21 evidence and to speak out about the Horizon System.
 22 I think it's right that you came forwards after seeing
 23 the BBC South Inside Out investigation that was
 24 broadcast in, I think, 2011; is that right?

25 **A.** I can't really remember. There was something I saw or

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1 read and it just triggered some memories, and I just
2 knew that we'd been busily trying to patch systems
3 behind the scenes and it seemed wrong that -- well, it
4 might have been wrong that postmasters may have been
5 getting the blame for something that actually wasn't
6 their fault.

7 So I just contacted someone, I'm not sure who, and
8 said, "I used to work on the systems", and if they
9 wanted to talk to me, you know, I'd be willing to have
10 a chat and explain what we did.

11 **Q.** So what was it that triggered you coming forwards? What
12 did you see or read? You mentioned there, I think,
13 postmasters getting the blame. In what way were they
14 getting the blame?

15 **A.** Being sent to prison or prosecuted for things that
16 weren't necessarily their fault. It seemed
17 an injustice.

18 **Q.** So did you essentially become a whistleblower?

19 **A.** Yes, I didn't think of that term at the time until it
20 was mentioned, you know, years later, but yes.

21 **Q.** Did you speak, give an interview, to Panorama in 2015?

22 **A.** Yes.

23 **Q.** As I've said already, you gave evidence before
24 Mr Justice Fraser in the Group Litigation Order
25 proceedings over a day and a half on 13 and 14 March

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1 a branch (eg a 'shortfall' of £5,000) then I would need
2 to work sequentially through all transactions over the
3 relevant period, and also work through thousands of
4 lines of computer coding. Software programs were
5 written by us to strip out irrelevant data to enable us
6 to more easily locate the error."

7 I want to ask you some questions about that, please.
8 You say you would need to "look sequentially through all
9 the transactions over the relevant period", and why
10 would you have to do that?

11 **A.** If there was an error of -- I mentioned £5,000 there,
12 but quite often it would be a random, you know,
13 £4,011.27 or something. You would need to look at all
14 the transactions to see which one was at fault. If you
15 were lucky, you would find one for that exact value but,
16 more often than not, there wouldn't be one and it would
17 be a sum of several transactions, so you'd then be
18 trying to work out which transactions it was that, added
19 together, came up with that value. If you could easily
20 locate those values and those transactions, you would
21 then need to work out why that error had occurred, what
22 had gone wrong to cause the error.

23 **Q.** So just stopping there. How would you do that first
24 task, looking sequentially thorough all of the
25 transactions over the relevant period?

15

1 2019?

2 **A.** Yes.

3 **Q.** Can I ask you to look at your witness statement, please,
4 paragraphs 7, 8 and 9, which is on page 4 of the witness
5 statement. I'm going to explore here the nature of the
6 issues that were referred to you in the SSC.

7 Sorry, it's my mistake. Can we have up on the
8 screen POL00029991.

9 It's my mistake, Mr Roll, it was paragraphs 7, 8 and
10 9 of this document that's going come up on the screen
11 for you that I wanted you to look at, rather than your
12 Inquiry witness statement. This is a copy of the
13 witness statement -- if we just scroll up to the top of
14 it -- that you made in the High Court proceedings. It's
15 dated 11 July 2016 and it's the first of two witness
16 statements that you made, okay?

17 **A.** I think I made three witness statements.

18 **Q.** Ah, we've got two. We'll explore where the third one
19 has gone.

20 Can you see paragraph 7 at the foot of the page?

21 You're introducing the work that you did in the SSC.

22 **A.** Yes.

23 **Q.** You say:

24 "By way of example the type of issue that I would
25 deal with, if a financial discrepancy had arisen in

14

1 **A.** You would download the data from the database, for that
2 particular Post Office or counter, over the period of
3 perhaps 24 hours.

4 **Q.** How would you look through it?

5 **A.** Sorry, how would you look through it?

6 **Q.** Yes. Would you scroll or would you have something to
7 help you?

8 **A.** It varied. Sometimes you would scroll through the
9 pages, other times you'd print it all off. Using
10 various text editors and computer languages, we could
11 strip out all the irrelevant text so that would then
12 just leave the actual products and the values. So then
13 you could see what it was that they were selling there,
14 17 stamps at 49p each, or whatever.

15 **Q.** Sorry, Mr Roll, to interrupt you, just stopping you
16 there, you've moved to the bit at the end of the
17 sentence or the paragraph "Software programs were
18 written by us to strip out irrelevant data."

19 Who is the "us" in that sentence? Was that the SSC?

20 **A.** Yes. I wrote some myself.

21 **Q.** So you wrote software that had the purpose of removing
22 irrelevant data lines or data from the data that you
23 were looking at, so that you could try and focus on the
24 discrepancy in issue?

25 **A.** Yes.

16

1 Q. Could you give us an example of how such software might
2 strip out irrelevant data?

3 A. That's very difficult to explain without demonstrating
4 it or without showing you what the code looked like. If
5 you're familiar with what HTML code looks like, with the
6 angle brackets and the different tags, you can imagine
7 that there are lines and lines of code with that sort of
8 data in it. You may only have had four lines --
9 sometimes you might only have one line that actually had
10 any data that was relevant that you could actually read.

11 So we would write a program that would -- it would
12 pass the text, source text, line by line, and if it
13 found any of the relevant code -- relevant tags that we
14 didn't need, it would then strip those and it would then
15 write the -- anything that was relevant into a text
16 file. And then that text file would then be a clean
17 text file which we could actually read physically, much
18 more readable, in a list. We could do the reverse as
19 well. We could correct data and then, using a program,
20 put all the tags back in to then put it back into
21 a database. Does that explain suitably what I'm talking
22 about?

23 Q. Yes, it does. Thank you. You say in this paragraph
24 that you would also work through thousands of lines of
25 computer coding. Why would you be looking at the

17

1 Q. So you would track the issue back into the code?

2 A. Sometimes, yes.

3 Q. In the example you've given, would that be visible or
4 apparent to the subpostmaster at all?

5 A. Not necessarily. Sometimes the errors might only crop
6 up when the data was actually being processed on the
7 overnight batch processing, from what I remember. I'm
8 a bit hazy around this now.

9 Q. If we carry on into paragraph 8 of this statement, you
10 say:

11 "If there was a single error then that would be easy
12 to identify, however there were often multiple errors
13 which would 'snowball'."

14 A. Yeah, that's what I was trying to explain a minute ago,
15 where, if you've got that one value and that jumps out
16 at you, then it's quite easy to spot. But if you've got
17 several items that are being added incorrectly or
18 whatever, dealt with incorrectly, then it could be very
19 difficult to work out exactly which items or which
20 products were causing the problem.

21 Q. In that sentence there, are you referring to errors of
22 calculation or errors in the code or both?

23 A. It could be either. Although, generally, the code
24 caused the errors in the calculation at some point.

25 Q. How obvious was a single error in Horizon coding?

19

1 computer coding?

2 A. At times we were asked to try to identify -- we could
3 perhaps identify where an error had occurred in the
4 data, which lines of work it was. So then at times we
5 were asked to look at the source code for Horizon and
6 try and work out what exactly was going on in the source
7 code that caused that problem. We could then give it
8 back to the developers and say, "Here's the problem,
9 this is the source code, this is the source line, it's
10 wrong. It says here minus this value when it should say
11 plus this value", or whatever.

12 Q. Thank you, what would give you clue to thinking there
13 was something wrong with the source code and therefore
14 you would be examining the source code, the computer
15 coding?

16 A. Well, if you were going through the figures and you
17 could see quite plainly that they were maybe selling
18 stock and but one of the stock items, rather than the
19 money coming into the till, had actually been debited
20 from the till, then you'd think "Well, why is it doing
21 that? Why is the software saying it's been taken out
22 when, actually, it's come in?" So you might have
23 something like that and that's when you'd be able to go
24 to the code and think "Well, okay, where is it? What's
25 going on here?"

18

1 A. Um, sometimes, from what I remember, quite easy to spot,
2 and other times we couldn't find -- we couldn't work out
3 what was going on.

4 Q. You say there were often multiple errors and, as you've
5 explained, that could mean multiple errors of coding
6 which would snowball and that this would make matters
7 more complicated.

8 Where -- sorry, Mr Roll, do go on.

9 A. Multiple errors, it's difficult to say whether it was
10 multiple errors in the coding or just one error that was
11 having multiple effects on the accounts.

12 Q. When you identified an error in the Horizon coding or
13 some data corruption, could you tell how and when the
14 error had been made?

15 A. Sometimes.

16 Q. What would delineate when you sometimes could and
17 sometimes couldn't?

18 A. There was -- if it was one of -- a particular
19 transaction on the counter, so that counter software was
20 at fault, then the -- there would be a time stamp in the
21 database, which you could use to give you a time when
22 things had gone wrong. But that's about all I can
23 remember from that.

24 Q. Would you be able to tell whether it was an error in the
25 original writing of the code or an error which had been

20

1 introduced by some other coding within Horizon?
 2 **A.** No, not necessarily.
 3 **Q.** Was a primary aim of you and your team not just to
 4 identify the error in coding or data corruption but also
 5 to ensure that they were fixed?
 6 **A.** Our primary aim was to keep the system up and running so
 7 that it worked and so that Fujitsu didn't suffer any
 8 penalties, or the -- all the transactions had to go
 9 through within the three-day limit. If we could
 10 identify problems in the coding as we went along, then
 11 that was a bonus.
 12 **Q.** So is that why you described it as "patching it" earlier
 13 on?
 14 **A.** Sorry, as "patching it"?
 15 **Q.** Patching it up as you went along?
 16 **A.** Yeah, we were, yeah. We were patching the system as
 17 a whole, not necessarily the code.
 18 **Q.** You mention there that you understood that Fujitsu would
 19 suffer financial penalties, I think, in the event of
 20 delays in processing; is that right?
 21 **A.** Yes.
 22 **Q.** What was your understanding of those?
 23 **A.** It's a long time ago and I can't remember the figures
 24 exactly. My understanding was that if, for instance,
 25 a bank transfer didn't go through within three days,

21

1 do that. It was being looked at behind the scenes, and
 2 a web version was being considered, from what
 3 I remember. One of the problems was that the suppliers
 4 of the Riposte system, from what I remember, they
 5 couldn't -- it would have been very bad if we -- if
 6 Fujitsu had told them that we were going to move away
 7 from their product because they were still supporting us
 8 and supporting it. So if they'd known the rug was going
 9 to be pulled from under their feet, as it were, they may
 10 not have been as co-operative as they were.
 11 **Q.** Was it the case that sometimes, nonetheless, the errors
 12 in coding were passed on to the software developers
 13 within Fujitsu to fix?
 14 **A.** Yes, if we found a definite bug then we would pass it on
 15 to them to fix. We wouldn't fix the bugs ourselves.
 16 **Q.** How would the bug be passed on to the software
 17 developers to fix?
 18 **A.** I can't remember.
 19 **Q.** Can you remember, in terms of names, any of the software
 20 developers that would have these issues passed to them?
 21 I realise that we're two decades on now.
 22 **A.** No, I have a very poor memory for names and I can't
 23 remember any.
 24 **Q.** You say in paragraph 9 here:
 25 "We regularly identified issues with the computer

23

1 I think it was, then there would be a financial penalty
 2 of -- I can't remember, I think it was -- I don't know
 3 whether it was 10 pence or £10. It was a smallish
 4 financial penalty.
 5 The issue arose when you've got 20,000 counters or
 6 20,000 post offices, maybe 40,000 counters, whatever,
 7 sending the data through overnight for processing, so
 8 then that small financial penalty is multiplied
 9 thousands and thousands of times by the number of
 10 transactions that are being held up. So then, the SLAs
 11 that we were trying to meet could have had a substantial
 12 effect, maybe tens or hundreds of thousands of pounds in
 13 fines that Fujitsu may have had to pay.
 14 **Q.** Do I understand from what you said a couple of answers
 15 ago that you were saying that you understood your
 16 primary aim was to get the system up and running and
 17 working, back on the road, so that those financial
 18 penalties were either not suffered or were minimised --
 19 **A.** Yes.
 20 **Q.** -- rather than necessarily taking a fundamental look at
 21 what the underlying or root cause was?
 22 **A.** It was widely accepted that the underlying or root cause
 23 was that the system was crap. It needed rewriting. But
 24 that that was never going to happen because the money
 25 was not available, the resources were not available to

22

1 coding in the Horizon System. We would then flag those
 2 issues to the Fujitsu IT software developers. The
 3 developers would then work on a 'fix' while we monitored
 4 the whole estate in relation to that issue."
 5 Is that right?
 6 **A.** Yes.
 7 **Q.** Now, you were being asked to look at an issue on the
 8 back, essentially, of a subpostmaster complaint; is that
 9 right?
 10 **A.** I was often asked to look at issues because of
 11 complaints from subpostmasters, yes.
 12 **Q.** But, presumably, if a coding error was discovered as
 13 a result of the investigation of that complaint or some
 14 data corruption, that could potentially have affected
 15 hundreds or even thousands of other transactions with
 16 other subpostmasters?
 17 **A.** Yes.
 18 **Q.** Was there any process to identify whether any other
 19 transactions were afflicted by the bug that was
 20 discovered?
 21 **A.** I think so but I can't remember for definite.
 22 **Q.** Can you remember whether that was an SSC task or
 23 somebody else's task?
 24 **A.** It would have been an SSC task.
 25 **Q.** So, trying to jog your memory, if I can, a little, would

24

- 1 it be part of the SSC's task to put right the
2 consequences of a bug that had been discovered, not just
3 for the subpostmaster who had raised the issue but for
4 a wider range of subpostmasters?
- 5 **A.** Yes.
- 6 **Q.** Can you remember whether the other subpostmasters' data,
7 that may have been afflicted by this bug, were notified
8 of the cause of the discrepancy or error in their own
9 data?
- 10 **A.** I can't say definitely but I'm fairly sure that they
11 weren't.
- 12 **Q.** So were they told "There's an error in your data, it's
13 going to be corrected, here's the correction"?
- 14 **A.** That specifically: sometimes yes, sometimes no.
- 15 **Q.** So sometimes they weren't even told that their data was
16 being corrected; it was corrected without their
17 knowledge?
- 18 **A.** Yes.
- 19 **Q.** Sometimes they were told that their data was being
20 corrected?
- 21 **A.** Yes.
- 22 **Q.** But your memory is that they weren't told the underlying
23 reasons why it was flawed or affected in the first
24 place, ie "This is a software bug within Horizon"?
- 25 **A.** That's what I remember, yes.

25

- 1 **Q.** Can we turn to paragraph 17 of your Inquiry witness
2 statement, please, which is on page 7 at the foot. You
3 say:
4 "In my opinion the coding and development of the
5 system did not meet my expectations of quality for
6 a major software project; I considered it to be a very
7 poor system that should never have been deployed but
8 I cannot be more specific than this."
9 Does that reflect the epithet that you applied more
10 pithily earlier as to your overall view of the system?
- 11 **A.** Yes.
- 12 **Q.** Can we turn back, please, to paragraph 11, which is on
13 the previous page. You say:
14 "Sometimes we were instructed not to let the
15 [subpostmaster] know we had altered his system whilst he
16 was logged on -- to my recollection, sometimes POL
17 requested this, sometimes Fujitsu, and sometimes only
18 our department knew of it."
19 **A.** Yeah.
- 20 **Q.** Where did the instruction come from, from within
21 Fujitsu?
- 22 **A.** I have no idea.
- 23 **Q.** Who was communicating that instruction to you?
- 24 **A.** It would have come from the manager, Mik Peach.
- 25 **Q.** If the instruction came from POL, did it come directly

27

- 1 **Q.** When you were dealing directly with a subpostmaster, say
2 the person that had raised the issue, the complaint, did
3 you explain to them that their problem had, on
4 investigation, been found to have had, as its root
5 cause, a coding error or bug within Horizon?
- 6 **A.** Quite often we'd identify the problem with the data on
7 the counter, we'd know what was wrong with that so we'd
8 be able to fix that, but we wouldn't know at that point
9 what had caused it so if we were talking to the
10 postmaster, we would have just say that we'd identified
11 the problem "with your counter, there's been data
12 corruption, or something, and we need to fix it, so we
13 need to do this, whatever, to fix the problem, otherwise
14 there will be a problem with your account".
- 15 **Q.** So it wasn't habitually fed back to them that it was
16 a coding error, or multiple coding errors, that had
17 caused the underlying problem?
- 18 **A.** No.
- 19 **Q.** Was there an official line on this as to whether or not
20 you should or shouldn't tell subpostmasters what the
21 underlying causes of these data errors or corruption
22 were?
- 23 **A.** I can't remember if there was an official line or not.
- 24 **Q.** But the practice was to not tell them?
- 25 **A.** Yes.

26

- 1 from POL to you, the Post Office to you, or did it go
2 via Mik Peach?
- 3 **A.** It went via Mik Peach.
- 4 **Q.** So one way or another, instructions not to let the
5 subpostmaster know you had altered system whilst they
6 were logged on came through Mr Peach?
- 7 **A.** Yes.
- 8 **Q.** Can you remember whether there was any discussion in the
9 office at the time about whether it was important to
10 notify the subpostmaster community more broadly of the
11 finding of a Horizon System error and that this was
12 causing or could cause discrepancies of data?
- 13 **A.** I can't remember there being any discussion about that.
14 It was, as far as we knew, it was notified through Mik
15 Peach, through the development teams and through to POL.
16 If the chain of management was working correctly, then
17 POL would have been informed and then it was down to POL
18 to inform their managers that there was a problem.
- 19 **Q.** When you were speaking to subpostmasters and you said
20 sometimes you would tell them that "We've investigated
21 and we found that this is the problem". Would you ever
22 say, "Look this is an issue we've come across before.
23 Don't worry, it's not you, it's the system. We've had
24 a number of reports like this"?
- 25 **A.** We would have -- I'm sure that on occasion we said

28

1 "We've seen this before, it'll only take a few minutes
2 to fix", or something along those lines, yes.

3 **Q.** You mentioned earlier your view of the Horizon System.
4 Could we look, please, at POL00029991, and look at
5 page 2, please, and look at paragraph 10. This is your
6 first witness statement in the High Court proceedings,
7 Mr Roll. In paragraph 10 you say:

8 "My recollection is that the software issues we were
9 routinely encountering could, and did, cause financial
10 discrepancies at branch level, including 'shortfalls'
11 being incorrectly shown on the Horizon System."

12 Just stopping there, you say "software issues [you]
13 were routinely encountering could, and did, cause
14 financial discrepancies". Can you expand at all or
15 explain what you mean by "routinely encountered"? Was
16 it a daily occurrence or a weekly occurrence?

17 **A.** Um ... I would say that my recollection would have been
18 a weekly occurrence within the team.

19 **Q.** Was that consistently so over the three and a half years
20 that you were in the SSC?

21 **A.** There were times when maybe some new software had been
22 released and that would be a bit buggy, so there would
23 be times when we were having multiple issues and it was
24 very, very busy. At other times, we were able to work
25 on some -- we would have been a bit quieter so then we

29

1 coding improved and of the documentation, but that's
2 a distant memory now and I can't really remember
3 definitely.

4 **Q.** What was the cause of the improvement in standards of
5 coding?

6 **A.** I just think people were being more professional about
7 it.

8 **Q.** Why were they being more professional about it?

9 **A.** I don't know. Maybe -- I don't know.

10 **Q.** Which people are you talking about? Are you talking
11 about the people in the software development arm?

12 **A.** Yes.

13 **Q.** When you joined in early 2001 and over the course of the
14 first year, did you form a view of how reliable the
15 Horizon cash accounts were?

16 **A.** Yes.

17 **Q.** What was your view?

18 **A.** It was pretty ropery. I said to Mik, the manager, at one
19 point that "Surely, this should be rewritten". His
20 reply was "Yes, but it's never going to happen", or
21 something like that. I think I mentioned that before.

22 **Q.** The "it's that never going to happen", was that for the
23 reasons that you gave earlier: money and the damage of
24 a relationship between Fujitsu and Riposte?

25 **A.** Money, relationship damage, also we just didn't have the

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1 would try to work on other things that had been maybe
2 put on the back burner but I couldn't really go into any
3 more depth than that. I can't really remember any of
4 the details.

5 **Q.** Thank you. Can I just explore, so that I -- my
6 understanding of what you are saying is completely
7 accurate. You said that after a new release, the system
8 might become a bit buggy. Do you mean there would be
9 a spike in reports of discrepancies following the
10 release of some new software?

11 **A.** Yes. There might be more reports from the postmasters
12 or we might find more problems with our monitoring
13 systems that we'd set up to monitor the system to make
14 sure everything was running smoothly. Sometimes the
15 postmasters would not have been aware of the problem.
16 They wouldn't have seen it, but we'd have picked it up
17 so we'd then fix it, and not necessarily by going into
18 the counters or anything, but just by manipulating the
19 data further along the line.

20 **Q.** Looking at the three and a half year period as a whole,
21 and putting aside the peaks and troughs that you've just
22 described, over the course of that three and a half year
23 period, did the position get any better or worse or did
24 it just stay the same?

25 **A.** I think it improved. As time went on, standards of

30

1 staff, which comes down to money, again, yes.

2 **Q.** You tell us at the end of paragraph 10:

3 "If we were unable to find the cause of the credible
4 then this was reported up the chain and it was assumed
5 that the postmaster was to blame."

6 **A.** That's my belief, yeah.

7 **Q.** Who was it assumed by?

8 **A.** Post Office, I believe, and the management of, probably,
9 Fujitsu.

10 **Q.** Do you know how such a decision or how such
11 an assumption was made by them? How they came to assume
12 it?

13 **A.** No.

14 **Q.** Do you know who was involved in reaching that view?

15 **A.** No.

16 **Q.** But the way you expressed it, makes it sounds as if it
17 was by -- a view was reached by default?

18 **A.** That was my feeling. If we couldn't find a problem with
19 the system, if we couldn't work out why there was an
20 error or why there was a problem, then the position,
21 from what we -- from what I understood, was that if we
22 can't find the problem in the code or in the data, there
23 is no problem. So, therefore, if there's no problem
24 with the system, it must be the postmaster.

25 **Q.** Did you understand that action was therefore taken

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1 against subpostmasters?
 2 **A.** No. At the time we would be looking at this, it could
 3 be years later before any action was taken. That's my
 4 understanding.
 5 **Q.** An assumption that it must be action by or wrongdoing by
 6 a subpostmaster doesn't sound like a very strong
 7 foundation to take action against them, as opposed to
 8 proof positive that they had done something wrong. How
 9 comfortable with what was happening did you feel at the
 10 time?
 11 **A.** At the time, we didn't know any action was going to be
 12 taken.
 13 **Q.** Were you aware that people were being prosecuted?
 14 **A.** Not at that time.
 15 **Q.** In the first year of working, so early 2001 onwards, did
 16 you hear that anyone in third line support or indeed
 17 fourth line support was asked to be an expert witness in
 18 a Horizon prosecution at Kingston Crown Court? I'm
 19 referring to the case of Tracy Felstead?
 20 **A.** I can't remember. I don't think so.
 21 **Q.** If we scroll down, please. In paragraph 11, in the
 22 first sentence, you tell us that there were over 30
 23 individuals working on the same floor -- I've asked you
 24 about that already -- and that your recollection was
 25 that many of those individuals were involved in similar

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1 say in paragraph 12:
 2 "At paragraph 167 Dr Worden describes software
 3 errors being corrected by Transaction Corrections, and
 4 [he] states 'If there were any such software error, it
 5 would probably occur with such high frequency, and occur
 6 uniformly across all branches, giving rise to so many
 7 [Transaction Corrections], that Post Office would soon
 8 suspect a software error (for instance, seeing the
 9 effect repeatedly in some MIS report) and require
 10 Fujitsu to correct it.'"
 11 You say:
 12 "I do not recall Fujitsu carrying out any analysis
 13 of Transaction Corrections to try to identify if there
 14 may be an underlying software error. I also think it is
 15 wrong to say that software errors would occur uniformly
 16 across branches as [you] explained ... above. My
 17 experience was that software errors occurred in very
 18 specific factual circumstances, which is why they were
 19 challenging to identify and correct."
 20 Is what you say there accurate?
 21 **A.** Yes, I believe so.
 22 **Q.** This tends to suggest that, in your team, there wasn't
 23 any underlying analysis -- or, sorry, any analysis of
 24 underlying root causes; would that be fair?
 25 **A.** I'm not sure I can really remember now. If we were

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1 work or other Horizon related IT work. Then in the last
 2 sentence, you say this:
 3 "I would describe much of the work being carried out
 4 as 'firefighting' coding problems in the Horizon
 5 System."
 6 I just want to understand what you mean by that.
 7 I understand "firefighting" to mean spending time on
 8 problems that need to be dealt with quickly instead of
 9 working in a calm, ordered and planned way. Is that the
 10 sense in which you meant it?
 11 **A.** Yes.
 12 **Q.** What was it like working in such an environment?
 13 **A.** It was quite hectic at times. Sometimes there'd be
 14 a bit of a panic on and it would be all hands on deck to
 15 get a -- fix a system as quickly as possible. That's
 16 all I can say, really.
 17 **Q.** Thank you. Can we look, please, at the second witness
 18 statement you provided in the High Court proceedings,
 19 and that's POL00042225. Can you see this is your second
 20 witness statement, dated 16 January 2019.
 21 **A.** Yes.
 22 **Q.** Can we go to the fourth page, please, and look at
 23 paragraph 12. Here I think you've been asked to reply
 24 to or comment on certain paragraphs in a report produced
 25 by the defendant, Post Office, Dr Robert Worden, and you

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1 getting lots of calls in, then -- for a specific or very
 2 similar problem, you know, within a period of a couple
 3 of days, then, you know, you'd be very aware of that
 4 and, if that was the case, then sometimes we would have
 5 been probably aware of that and worked on a fix before
 6 POL were even aware of it.
 7 **Q.** I'm more getting to the issue of whether the Post Office
 8 came to you and said "We suspect a software error. Can
 9 you conduct", I don't know "some meta analysis of the
 10 system to see whether our suspicion is correct"?
 11 **A.** I don't think the Post Office ever came to us to say
 12 that. I can't remember for sure but I'm pretty certain
 13 they didn't.
 14 **Q.** Thank you. That can come down now.
 15 Were you aware of a team called the Customer Service
 16 Security Team?
 17 **A.** I don't remember that phraseology, no.
 18 **Q.** Can you recall or remember somebody called Andrew or
 19 Andy Dunks?
 20 **A.** No.
 21 **Q.** Can you recall a job title or role being undertaken of
 22 the cryptographic key manager?
 23 **A.** There was a key, which was a crypto key, if you like,
 24 which was generated by a secure PC in a locked room
 25 within the SSC, bearing in mind that the SSC itself was

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1 on the sixth floor of a very secure building behind
 2 double doors that were extremely secure. It was a very,
 3 very secure area. But that's about all I can remember.
 4 **Q.** Mr Dunks was the manager of the cryptographic key.
 5 We've heard from him recently. I think it follows from
 6 what you've said that you didn't have any or you don't
 7 recall any liaison with him or the security team?
 8 **A.** No.
 9 **Q.** We know that he, the cryptographic key manager, was
 10 selected to give evidence by provision of witness
 11 statements and giving oral evidence in court, about what
 12 you and your team in the SSC had done in response to
 13 calls to the SSC and the work that your team had
 14 undertaken as recorded on call logs. Do you understand?
 15 **A.** Right.
 16 **Q.** Do you know why one of that team, the customer service
 17 team, and, in particular, the person that managed the
 18 cryptographic key, was selected to give evidence about
 19 what you and your team were doing in the SSC?
 20 **A.** No.
 21 **Q.** Were you ever party to a discussion or did you ever hear
 22 about why somebody who managed the cryptographic key
 23 would give evidence about what some other people were
 24 doing, rather than you or somebody in your team giving
 25 evidence?

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1 Can we have up, please, POL00029991. This is your first
 2 witness statement, in the High Court proceedings again,
 3 and if we turn to the third page, please, and look at
 4 paragraph 14 at the top, you say:
 5 "As well as software issues, I can also recall that
 6 there were regular IT hardware issues at branch level.
 7 However, I would reiterate that the main recurring
 8 issues were software issues."
 9 Could hardware issues affect the integrity of the
 10 data recorded or produced by Horizon?
 11 **A.** Yes.
 12 **Q.** What hardware issues would typically affect the
 13 integrity of the data recorded or produced by Horizon?
 14 **A.** If the database on one of the counters became corrupted
 15 then it could stop that counter communicating with the
 16 rest of the system, which would lead then to
 17 transactions being marooned on that counter. Depending
 18 on what the problem on the counter was, it may have been
 19 a fairly quick fix, maybe we could just fix it on the
 20 counter itself, or it may have been that we had to get
 21 the counter back into Bracknell where one of the guys
 22 would hack into it and retrieve the data.
 23 Sometimes, if the counter was beyond recovery, then
 24 transactions could be lost, so bills that had been paid
 25 may not have gone through or whatever money that had

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1 **A.** Sorry, can you repeat the question?
 2 **Q.** Yes. Did you ever hear any discussion or were you ever
 3 party to any discussion about why Mr Dunks, the crypto
 4 key manager, was giving evidence about what was or
 5 wasn't shown on helpdesk call logs that were completed
 6 by you and members of your team, rather than a member of
 7 you and your team giving evidence?
 8 **A.** No.
 9 **Q.** Did anyone ever ask you to give evidence about what you
 10 did in response to any calls or raising of concern about
 11 data errors or discrepancies?
 12 **A.** I don't think so.
 13 **Q.** If they had have done so, would you have described all
 14 of the issues and the problems that we are discussing
 15 here today?
 16 **A.** Probably, yes.
 17 **Q.** Did you ever hear any discussion about who from Fujitsu
 18 should attend court to give evidence about the operation
 19 of the Horizon System?
 20 **A.** I don't recall ever hearing anything about that, no.
 21 **Q.** In your time, did you know whether anyone from Fujitsu
 22 was to attend or had attended court giving evidence
 23 about the operation of the Horizon System?
 24 **A.** I can't remember that happening.
 25 **Q.** Thank you. Can I turn to some hardware issues, please.

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1 been paid to the counters -- to the post office, might
 2 not have been recorded properly.
 3 **Q.** Thank you. That can come down. Can we look, please, at
 4 POL00042225. This is your second witness statement.
 5 Can we go to page 2, please, and look at paragraph 5
 6 under the heading "Hardware Failures". You say,
 7 "Dr Wordon refers", and you remember what you were doing
 8 in this statement:
 9 "Dr Wordon refers at paragraph 151 of his report to
 10 hardware failures. He says 'Although the hardware in
 11 the branches was not always reliable and communications
 12 infrastructure at that time were not highly liability,
 13 there were strong measures built into Old Horizon to
 14 ensure that hardware failures and communication failures
 15 could not adversely affect the branch accounts'.
 16 You say:
 17 "During my time at Fujitsu we frequently encountered
 18 hardware failures which had occurred in branches and
 19 required our intervention to attempt to remedy the
 20 problem. I would estimate that I was involved with
 21 a hardware failure on average at least once a month.
 22 These problems could and did affect branch accounts."
 23 Is that correct?
 24 **A.** Yes.
 25 **Q.** At paragraph 6, you say:

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1 "The most extreme case that I can recall was
2 a complete failure of a counter to communicate with the
3 server, which required the counter to be removed to the
4 SSC so that the data could be recovered, and
5 a replacement counter installed in the sub post office.
6 Prior to the problem being identified, data could be
7 backing up on the counter without it being replicated to
8 the other counters or to the correspondence server."

9 Is that correct?

10 **A.** Yes.

11 **Q.** Is that what you were alluding to a moment ago?

12 **A.** Yes, I can definitely remember one where we had it --
13 more than one where they were brought back for the data
14 to be recovered and then put back into the system later.
15 I can't for 100 per cent recall whether we had one where
16 we couldn't recover all the transactions but I'm fairly
17 sure we did have one where we didn't --

18 **Q.** I'm sorry, I missed what you said at the end there?

19 **A.** I'm fairly sure there was one or more occasions where we
20 couldn't recover all the data but I can't say that for
21 certain.

22 **Q.** Can we skip to paragraph 8, please. You say:

23 "I recall one particular case where branch data was
24 not being replicated from a mobile post office correctly
25 and it appeared that the subpostmistress was turning off

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1 was not recalled. It is my belief that Fujitsu senior
2 management and Post Office were not informed."

3 Is that all correct?

4 **A.** Yeah.

5 **Q.** When you're referring to Fujitsu senior management not
6 being informed, who were you referring to, what level?

7 **A.** Well, my manager knew, Mik Peach, his friend who ran the
8 build team knew. Whether Mik ever told his manager,
9 I don't know. As far as I'm aware, it never got up the
10 chain beyond that. I was told to basically hush it up.

11 **Q.** Why were you -- what words were used to tell you
12 basically to hush it up?

13 **A.** I can't remember exactly but it was -- it had been dealt
14 with.

15 **Q.** Who told you basically to hush it up?

16 **A.** Mik.

17 **Q.** In an answer a couple of answers ago, you say you don't
18 know whether it went any further. Here, you say it's
19 your belief that it didn't go any further, that Fujitsu
20 senior management were not informed. What was that
21 belief based on?

22 **A.** The way I was asked to close the call and the fact
23 that -- I can't remember exactly it's just that -- the
24 way I was told to deal with the caller and to get rid of
25 it.

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1 the power mid transaction. As we could not fix this
2 problem over the phone with the subpostmistress, she
3 sent the laptop to Fujitsu for examination. Using the
4 Post Office test rigs on the sixth floor, and comparing
5 the results with the laptop that had been returned to
6 Fujitsu, I discovered that the button which should have
7 put the laptop into standby mode was actually switching
8 off the power, resulting in the disk crashing.
9 I disassembled the laptops to confirm this. Thus, when
10 the postmistress thought she was switching her counter
11 to standby mode, which would have initiated a controlled
12 shutdown and allowed the datastore to replicate the
13 servers, she was actually switching the power off, which
14 is what we were seeing in the SSC. When I raised this
15 with my manager, Mik Peach, who subsequently talked to
16 the hardware team, I found out that this was a known
17 problem: one of the engineers had made a mistake with
18 a batch of laptops which had been sent out to branches
19 before the error was detected. No one outside the team
20 responsible for building the laptops had been informed
21 of this meant that I had spent several days
22 investigating the problem. Whereas the subpostmistress
23 in this case was provided with a replacement laptop,
24 knowledge of this problem was kept within the
25 departments concerned and the batch of faulty laptops

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1 **Q.** Was that the only time that that kind of thing was said
2 to you? Was this an isolated example, so "Keep it
3 within the team", or did that happen on more than one
4 occasion?

5 **A.** That is the only one that really sticks in my memory.
6 I can't remember if it happened on more than one
7 occasion.

8 **MR BEER:** Thank you.

9 Sir, it's quarter past now. I wonder whether that
10 might be an appropriate time for the morning break.

11 **SIR WYN WILLIAMS:** Yes, certainly. 11.30 all right,
12 Mr Beer?

13 **MR BEER:** Yes, thank you very much.

14 **SIR WYN WILLIAMS:** All right, see you again at 11.30,
15 Mr Roll.

16 **THE WITNESS:** Thank you.

17 (11.13 am)

(A short break)

19 (11.30 am)

20 **MR BEER:** Sir, good morning, can you see and hear me?

21 **SIR WYN WILLIAMS:** Yes, I can. Thank you.

22 **MR BEER:** Can you, Mr Roll?

23 **A.** Yes, thank you.

24 **Q.** Thank you very much. Can we turn up a document, please,
25 with the URN FUJ00086267. You'll see, from the bottom

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1 right of the document, that this is dated 2011, so
 2 post-dated by many years at the time of your leaving
 3 Fujitsu. If you scroll to the top, please, you will see
 4 under the abstract that it concerns HNG-X, Horizon
 5 Online, of which you were not a part, correct?
 6 **A.** Correct.
 7 **Q.** But I want to ask you about whether something within the
 8 document replicates the position when you were working
 9 for that three and a half year period for Fujitsu. Can
 10 we turn, please, to page 15 and look down to
 11 paragraph 2.7, "Removal of duplication". If we just
 12 read it together:
 13 "All support groups should ensure that they do not
 14 pass to the right duplicate incidents, ie incidents
 15 which are repetitions of an incident which has already
 16 been passed to the next line of support. They should
 17 either retain the duplicate incidents within their own
 18 call logging system or close them as duplicates:
 19 "1st line units retain duplicates under a 'master
 20 call' and to ensure that when the resolved incident is
 21 received from 2nd line, the end user is contacted and
 22 duplicated call incidents closed within TFS.
 23 "2nd-4th line support units normally immediately
 24 close the incidents as duplicates because they add no
 25 value to the support process at these levels. This

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1 I couldn't -- I don't know her. I only remember the
 2 name because the name has come up recently.
 3 **Q.** Do you remember that person, even though you wouldn't
 4 recognise her, as a person who worked, in your time, at
 5 the SSC?
 6 **A.** Yes.
 7 **Q.** Can you recall whether she had any particular expertise?
 8 **A.** I think she was very good on the accounting side, as she
 9 was, I think, very experienced in going through the
 10 databases but I can't remember, really.
 11 **Q.** Did she, to your knowledge, have any expertise in the
 12 integrity of the software on Horizon --
 13 **A.** I can't remember.
 14 **Q.** -- or on the integrity of Horizon data?
 15 **A.** I can't remember.
 16 **Q.** In your time, noting the time at which you left, did you
 17 have any conversations with her about a requirement for
 18 her to give evidence in any court proceedings?
 19 **A.** No, not that I remember.
 20 **Q.** In your time, can you recall whether she was selected to
 21 give evidence in any court proceedings?
 22 **A.** No, I don't remember. I don't recall anybody being
 23 selected but, from what you've said, they were, but
 24 I have no recollection of it.
 25 **Q.** Can we look, please, at POL00073280. This is an exhibit

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1 results in the incidents being returned to 1st line ...
 2 "Duplicate incidents are only acceptable where the
 3 symptoms reported by the customer did not match the
 4 symptoms recorded in the original incident, and which
 5 therefore could not reasonably have been identified as
 6 a duplicate.
 7 "Failures will be reflected in filtration figures
 8 where the incidents are closed in the 'duplicate
 9 incident' category in PEAK by subsequent support units."
 10 Does that reflect the working practice of the SSC at
 11 the time you were in post?
 12 **A.** I can't remember.
 13 **Q.** Can you remember any instructions on the treatment of
 14 duplicate incidents?
 15 **A.** No.
 16 **Q.** Can you remember any instruction, custom or practice,
 17 the effect of which was to minimise or seek to minimise
 18 the reporting of duplicate incidents, and that they
 19 would be regarded as a black mark against the support
 20 team concerned?
 21 **A.** Not sure. I think I -- they may have been returned to
 22 first line support because we were already looking at it
 23 but I can't remember for sure.
 24 **Q.** Okay, I understand. Do you remember Anne Chambers?
 25 **A.** I remember the name but I wouldn't recognise her.

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1 sheet, so it's like the front sheet of an exhibit
 2 produced by Mr Dunks, Andrew Dunks, who I mentioned
 3 earlier, and in it is a selection of call logs produced
 4 by Mr Dunks for the purposes of some civil proceedings
 5 that the Post Office took against a man called Lee
 6 Castleton.
 7 Can we turn to one of those call logs, please. It
 8 starts on page 20. Just if we can expand it out so you
 9 can look at the whole of the first page of it. Do you
 10 recognise the format of this call log?
 11 **A.** No.
 12 **Q.** At the time, did you ever look at call logs in printed
 13 format or would they appear on the screen to you?
 14 **A.** I think they were always on the screen.
 15 **Q.** You'll see, and bearing in mind that you wouldn't have
 16 seen it in this format, if we look at the top we can see
 17 that the call was opened on 25 February 2004. Can you
 18 see that --
 19 **A.** Yeah.
 20 **Q.** -- in the middle at the top? So that's within your time
 21 working on the SSC.
 22 **A.** Yeah.
 23 **Q.** Can you see in about ten boxes below under "Problem
 24 Text" it says "pm", which I think is postmaster:
 25 "[Postmaster] reporting that they are getting large

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1 discrepancies for the last few weeks."
 2 **A.** Yes.
 3 **Q.** Yes? Just so you know, this call relates to
 4 difficulties that Lee Castleton was having at his
 5 branch. I just want to run through this call log,
 6 please, to see whether you can help us with what some of
 7 the text means and what was done in relation to it.
 8 If we scroll down, please, to "Call Activity Log",
 9 which is right at the foot of the page at the moment.
 10 Again, you wouldn't have seen these entries in this way;
 11 they would be on a screen, is that right, for you, and
 12 not set out in this format?
 13 **A.** I can't remember. I don't know if we'd have seen any --
 14 much of -- all of this data or not. I can't remember.
 15 **Q.** Let's just go through it and see whether looking at it
 16 in a bit more detail and slowly helps you. Do you see
 17 the first entry "OPEN":
 18 "New call taken by Kuljinder Bhachu ..."
 19 This is on 25 February 2004:
 20 "... [postmaster] reporting that they are getting
 21 large discrepancies for the last few weeks."
 22 That's what we read above.
 23 Is that the way the SSC would operate, by putting
 24 a pithy summary of the text within an entry like that?
 25 **A.** I can't remember.

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1 **A.** A log of known errors.
 2 **Q.** Who was it maintained by?
 3 **A.** I can't remember.
 4 **Q.** Was it maintained by the SSC?
 5 **A.** I can't remember.
 6 **Q.** Next entry, later still:
 7 "Downloading event logs for progression [and some
 8 numbers] application ... system & ... security."
 9 Next entry, a little later still:
 10 "Previous history in calls ..."
 11 Then some references are given.
 12 Next entry:
 13 "Spoke to [postmaster], who advises that the problem
 14 with the CA ..."
 15 Do you remember what "CA" was?
 16 **A.** I think it's cash account.
 17 **Q.** "... started ever since the BT engineer came to move the
 18 BT box for the preparation for the installation of
 19 ADSL."
 20 **A.** Yeah.
 21 **Q.** Next entry, later still:
 22 "[Usernames are given] Other BAL users ... stock
 23 unit aa balance on Wednesday after 17.30."
 24 Does this mean anything to you so far?
 25 **A.** Not really. You've got two -- CTR001 is just

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1 **Q.** Okay, moving to the next line, also on 25 February:
 2 "Looking at closed calls for this site, there have
 3 been a number of calls logged regarding discrepancies.
 4 NBSC have been in contact with the [postmaster] and
 5 cannot find any user error."
 6 Can you now remember what NBSC was?
 7 **A.** No.
 8 **Q.** Okay. The next line, also later that day:
 9 "Spoke to Sandra [and] NBSC ... regarding this
 10 issue. Checked Tivoli events and health checked. Site
 11 is health checking ok."
 12 Can you now remember what Tivoli was?
 13 **A.** I think that was a software program that ran in the
 14 background and monitored events and set alerts if it
 15 detected anything, any errors.
 16 **Q.** Next entry:
 17 "Critical event scene @ [and a time is given on
 18 18 February] stating 'Error message. An error has
 19 occurred = see the audit log'.
 20 The next entry later still that day, "KEL
 21 Reference".
 22 Can you remember now what KELs were?
 23 **A.** Yeah, that was the Known Error Log. That's about all
 24 I remember of it.
 25 **Q.** Can you remember what the Known Error Log was?

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1 a username. So that's all I can say from that.
 2 **Q.** Then this:
 3 "Could SSC please investigate why this [post office]
 4 is experiencing large discrepancies ever since BT
 5 engineer has moved BT box in preparation for ADSL
 6 [installation]. KEL [reference] given as possible
 7 problem. NBSC have said there is no user error."
 8 Would you understand that last entry to mean that
 9 "It's not the subpostmaster that's doing anything
 10 wrong", say NBSC?
 11 **A.** Yes.
 12 **Q.** Then skipping to the foot of the page, bar one entry,
 13 an entry by Barbara Longley:
 14 "Incident Under Investigation Prescan: Assigning
 15 call to Anne Chambers in EDSC."
 16 Can you recall what EDSC was?
 17 **A.** No.
 18 **Q.** Can we go over the page, please. An entry by Anne
 19 Chambers on the 26th:
 20 "Incident Under Investigation. KEL quoted is
 21 relevant -- if the audit log had been checked, it would
 22 have shown a different error message. The event was
 23 part of a storm which occurred over the estate that
 24 night as a result of a faulty software fix, and has
 25 nothing to do with the discrepancies."

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1 Can you help us with what "a storm occurring over
2 the estate" might refer to?
3 **A.** I think it refers to a whole load of errors that were
4 generated but, I must admit, I'm guessing there.
5 I can't remember.
6 **Q.** Okay. The next entry:
7 "No transaction date and time was provided for this
8 transaction using current date and time."
9 Then an entry by Anne Chambers:
10 "Advice and guidance given. I have checked various
11 things on the system. All the internal reconciliation
12 checks are okay. Cheques are being handled correctly
13 (except for 10th Feb when the clerk forgot to cut off
14 the report -- but this didn't cause a discrepancy).
15 Cash declarations look okay, they usually use drawer
16 ID11. Occasionally they have used a different drawer
17 ID, this can lead to amounts apparently doubling on the
18 cash flow report, and should be avoided. But again it
19 will not cause a discrepancy. Checking the cash
20 transactions on the system against the declarations
21 shows that they're not working particularly accurately,
22 (ie at the end of the day the cash they declare in the
23 drawer is tens, hundreds or thousands of pounds astray
24 from what has been recorded on the system). It is
25 possible that they are not accurately recording all

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1 investigate a call like this?
2 **A.** I'm trying to remember. The KEL would have information
3 about what the symptoms of the problem were. It gives
4 you pointers as to what was causing the problem, so that
5 then you could go into the system and look for those
6 particular traits, if you like, to confirm that that was
7 the problem, and it would then give you the details of
8 the fix, which you could then apply to rectify the
9 problem.
10 So if they provided a KEL there but then, when you
11 looked at it, all the audit log data or whatever, event
12 logs, et cetera, didn't have the relevant information in
13 or different information in them, then that KEL wouldn't
14 apply. So that would then not be the KEL that was
15 relevant. In that case, you're then sort of working
16 blind and you've got to try to work out from what the
17 postmaster is saying where there is a problem.
18 So you'd be working on that, going through the
19 systems, the accounts, et cetera, and trying to find
20 out, if there was a problem with the counters or with
21 the software, where it was. Working blind, largely, and
22 then -- that's all I can really say. You'd have three
23 days to find the fault and then you'd have to hand it
24 back.
25 **Q.** We can see that, here, the helpdesk put up a KEL number,

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1 transactions on the system. There is no evidence
2 whatsoever of any system problem. I've mentioned this
3 outlet to Julie Welsh (Customer Services) who will try
4 to get POL to follow it up, but in the meantime please
5 tell the [postmaster] we have investigated and the
6 discrepancies are caused by the difference between the
7 transactions they have recorded on the system and the
8 cash they have declared, and are not being caused by the
9 software or hardware."
10 Then there's some entries that don't concern us.
11 Can you tell what Anne Chambers has done, from these
12 records, in order to reach these conclusions?
13 **A.** No.
14 **Q.** What would, typically, you do when presented with the
15 problem that Anne Chambers was presented with? What
16 investigative steps would you undertake?
17 **A.** There's not a lot of information in the call log for me
18 to give you much of an answer to that. I don't think
19 there was any specific figures given. I can't remember
20 what I'd have done in this situation.
21 **Q.** Can you remember a species of data called ARQ data?
22 **A.** No.
23 **Q.** Can you help us, and given the answers to the questions
24 I've asked so far, I think it might be limited, the
25 help, you can give us, how a KEL would be used to

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1 and Anne Chambers looked at that KEL and found that it
2 wasn't relevant. Was there a way of searching the KELs
3 to look for a fault or problem that was similar to the
4 one that you were being asked to investigate? Because,
5 in this case, she's ruled out that KEL as being
6 applicable. Was there a way of, I'm imagining a keyword
7 search, or free text search, or way into the KELs, to
8 look at whether the problem that you were being asked to
9 look at was indeed a known error?
10 **A.** I can't remember.
11 **Q.** Okay, thank you. Can that come down now, please. Can
12 we look at an Excel spreadsheet document. It's
13 POL00028922. Thank you. We're looking at tab 5, and
14 it's called "Finals Count". The heading of this is
15 "Total PEAKs resolved" by you, between 21 March 2011 and
16 17 September 2004. That roughly accords with the period
17 of time that you spent in the SSC, doesn't it?
18 **A.** Approximately, yes.
19 **Q.** Do you know the provenance of a document like this?
20 **A.** No, no. I imagine that Fujitsu have provided it and it
21 will show some of the work that I did while I was there.
22 **Q.** It appears to be a record of result codes and a total of
23 them, on the right-hand side, attributed to you. I just
24 want to ask for your help, please, in whether you can
25 remember what any of the result codes are or, more

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1 particularly, the kind of problems and the resolutions
 2 of them that might occur. Do you see the first one is
 3 "Ref Data Fix Released to Call Logger"?

4 **A.** That's a reference data fix. Sometimes the reference
 5 data was corrupt or incorrect and so we'd have to send
 6 out a fix. The reference data, that's the reference
 7 data being all the information regarding, for instance,
 8 stamps, or fishing licences, or gas companies, utility
 9 companies, that sort of thing.

10 **Q.** So the cost of items supplied by third-party suppliers
 11 that the Post Office administered, essentially?

12 **A.** Costs, yeah, or maybe bank account -- no, that's
 13 probably a bad one. But address details or -- yeah,
 14 just -- not just costs but product details fully, you
 15 know, everything to do with the product.

16 **Q.** Thank you. A reference data fix, what would that
 17 involve?

18 **A.** I can't remember. I made some -- one of the teams would
 19 have to rewrite the database that held all the data and
 20 then redistribute it to the estate or to the relevant
 21 post offices.

22 **Q.** Why might the reference data be wrong or require fixing?

23 **A.** Somebody had keyed it in wrong.

24 **Q.** The next one, underneath, "S/W Fix Released to Call
 25 Logger".

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1 self-explanatory and at the risk of getting that kind of
 2 response from you again, can I just check what that
 3 does, in fact, refer to?

4 **A.** It means basically that, in the time we were allowed, we
 5 couldn't find a problem.

6 **Q.** A "product" is what, in that sentence?

7 **A.** Anything within the Horizon System. So it could be at
 8 the backend, where it's processing overnight; it could
 9 be on the counters. As I say, it doesn't mean there
 10 wasn't a fault; it just meant that we couldn't find it.

11 **Q.** You said "in the time that we were allowed". Was there
 12 a hard deadline on the amount of time that you were
 13 permitted to devote to investigation?

14 **A.** From my recollection, we were allowed three days.

15 **Q.** The next one "Published Known Error". Can I ask, who
 16 would the "Published" refer to: "published" to whom?

17 **A.** That was -- from what I remember, it was an error that
 18 had been confirmed and it had been -- the details had
 19 been promulgated to the first and second line with a fix
 20 or within an explanation or whatever, so that it should
 21 never have been sent to third line investigation because
 22 it had already been investigated and the problem was
 23 found. So it should have been dealt with at first or
 24 second line.

25 **Q.** Then an "Unpublished Known Error". Why might some known

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1 **A.** That's software fix.

2 **Q.** What would that refer to, which software and where?

3 **A.** I'm not sure. I mean, there were so many areas of
 4 software, not just the Riposte system that the counters
 5 were running in there. I can't remember the full
 6 details.

7 **Q.** But software within the Horizon System?

8 **A.** Somewhere within the system, yes.

9 **Q.** The third of them "Build Fix Released to Call Logger";
 10 what would a build fix release be?

11 **A.** I think that relates to the NT software that was running
 12 on the counters. So you had the basic counter, which
 13 was -- it had NT installed on it but it was very --
 14 that's Windows NT. It was a very doctored system, so
 15 that then the Riposte system sat on top of the NT system
 16 and on top of Riposte, from what I remember, there was
 17 the Horizon System. So the build fix, I think, referred
 18 to the NT, which was the basic box. If there'd been
 19 a software upgrade to the Windows software that maybe
 20 hadn't got through to that particular counter, that
 21 could then cause a problem later when newer software,
 22 newer Horizon software was downloaded. If that relied
 23 upon Windows being up to date but Windows wasn't up to
 24 date in that counter, that could have caused a problem.

25 **Q.** Thank you. "No fault in product". That may appear

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1 errors be unpublished?

2 **A.** I can't remember.

3 **Q.** Can you try and think back?

4 **A.** I can't remember.

5 **Q.** "Solicited Known Error"; to what did that refer?

6 **A.** I can't remember what that was.

7 **Q.** "Administrative Response", which seems to be one of the
 8 higher numbers. What was an "administrative response"?

9 **A.** That was a general catch-all. If you couldn't work out
 10 which one it should go in, then sometimes you just chuck
 11 it down as an administrative response. That's what
 12 I think it was.

13 **Q.** When you say "chuck it down", you would apply a result
 14 code --

15 **A.** Yeah, you had --

16 **Q.** -- of, in this case, 70, I think it is, to that?

17 **A.** Yeah, I think that's what it was. There were certain
 18 areas where it was -- it wasn't clear which one you
 19 should put it in. So that was, yeah, just -- I think
 20 that was the sort of catch-all.

21 **Q.** "Avoidance Action Supplied". Arising from that -- and
 22 it's a two-parter -- firstly, what is avoidance action
 23 and, secondly, to whom would it be supplied?

24 **A.** It would be applied to the estate so that could be to
 25 the servers, but this is -- I'm not 100 per cent certain

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1 about these, any of these, so this is what I seem to
2 remember. So from what I recall, this could be applied
3 to the servers overnight, so if the servers fell over in
4 the processing.

5 The way, when I was there, this worked, was that at
6 about 6.00 every evening, all the counters would start
7 uploading their data to the main servers, wherever they
8 were. They would be given a few hours to transfer all
9 the data and then it would all be batch processed. So
10 there were Unix programs and batches, batch files that
11 were run so they would sort the data into, you know,
12 American Express transactions and Barclays Bank
13 transactions, and all this sort of thing.

14 Then 20 minutes -- that would be given 20 minutes to
15 run, then there would be maybe another half an hour or
16 an hour, where it would add up all the figures for
17 American Express, and it would do the same for Barclays,
18 et cetera, and then another process would then run and
19 it would farm or send all the data out to another
20 database, but the next night -- because this would take
21 a long time -- processes would run to further refine
22 this data, before it was transmitted out actually to the
23 banks and to the American Express systems, et cetera.

24 So on the servers, if one of those processes fell
25 over, if you could get in quickly enough and restart it

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1 that fix onto the counters. So it was all ready to go
2 but it just hadn't been released yet.

3 **Q.** "Reconciliation -- resolved": to what does that refer?

4 **A.** I can't remember. Something to do with the accounting
5 but I can't remember exactly.

6 **Q.** "Suspected hardware fault"; that is self-explanatory.

7 **A.** Yeah.

8 **Q.** "Advice and guidance given": what kind of advice and
9 guidance might be given so as to result in this result
10 code?

11 **A.** Maybe it was a training issue or the postmaster was
12 doing something in the wrong order so that the figures
13 weren't adding up properly. In the previous examples
14 with that KEL, you mentioned that there was a stock
15 code -- sometimes the postmaster was using the wrong
16 drawer and that was causing issues. So that would be
17 the sort of advice that was given, you know, "Don't do
18 this because it will cause a problem".

19 Other things would be that, you know, "Don't turn
20 the computer off before 6.00 because, if you do that, it
21 may not transmit all the data", all that sort of thing.

22 **Q.** "Insufficient evidence": insufficient evidence to do
23 what?

24 **A.** To actually find out what the -- to even know where to
25 start looking for a problem.

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1 then it would carry on running that night. Otherwise,
2 if you missed the window, you had to rerun it the next
3 night, which would then cause a bit of a backlog. But
4 if you were able to do that, that would then be
5 avoidance action because you'd got it started again and
6 avoided any sort of action.

7 If it was on the counter, it could be that there had
8 been a database corruption and you had to go in, extract
9 the data, fix the corruption, put the data back onto the
10 platform so that then the system could carry on running
11 correctly. Again, that would be avoidance action.

12 **Q.** Thank you. "Duplicate Call"; is that self-explanatory?

13 **A.** Yes. Yeah.

14 **Q.** That means what, a call from two different
15 subpostmasters or the same call twice -- from the same
16 subpostmaster twice?

17 **A.** I think it could be either. I'm not 100 per cent
18 certain now.

19 **Q.** "Fixed at Future release": to what does that refer?

20 **A.** I think that was when there'd been a problem on the
21 counter, the postmaster had phoned it in, we'd
22 investigated, found it was a known problem and that
23 there was a fix that had been written but, because of
24 the amount of data traffic on the lines, we didn't have
25 time to actually -- there hadn't been time yet to put

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1 **Q.** "User error": "user", does that refer to the
2 subpostmaster or counter clerk?

3 **A.** Either, yes.

4 **Q.** "Route ... to CFM"; can you remember what that was?

5 **A.** I can't remember what that is.

6 **Q.** You'll see that the total that's attributed on this
7 spreadsheet to the PEAKs resolved by you in that
8 three-and-a-half-year period was 915, so 275/300 a year.
9 Does that accord with your recollection of the work that
10 you would have got through?

11 **A.** I can't really remember. Quite often you'd work on
12 other -- it's not a terribly accurate way of doing
13 things, unfortunately. Sometimes three or four of you
14 would be working on a call but any one would actually be
15 recorded on it. Other times, you might be allocated
16 a call, you might be working on three or four at the
17 time, so maybe you'd pass one or two on to somebody else
18 so then they would be given as the person who'd closed
19 it.

20 **Q.** So you're warning us not to take too much from this.
21 All this is a record of is where you entered the result
22 code?

23 **A.** Yes.

24 **Q.** Thank you very much. That can come down now.

25 Can we turn to the issue of remote access, please,

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1 and can we start, please, by looking at paragraph 9 of
2 your Inquiry witness statement. WITN00780100. It's
3 page 5. Just scroll down so we get paragraph 9, please.
4 Thank you.

5 Starting from the third line of your Inquiry witness
6 statement, you say:

7 "Apart from responding to requests for assistance
8 from second line, for example, looking into issues
9 reported by [subpostmasters] regarding accounting,
10 product errors, hardware failures, etc, or queries from
11 utility companies regarding payments made at [post
12 offices] that hadn't gone through, we also monitored the
13 system and ran remote programs we had developed which
14 provided advance warning of any failures, for example
15 with the overnight batch processing of network banking
16 transactions or benefits payments.

17 Then this:

18 "This sometimes meant we sometimes had to connect
19 remotely to the [subpostmasters'] Horizon terminals,
20 sometimes without their knowledge or consent, to make
21 changes to the counter configuration or the database
22 system."

23 Can I just check, Mr Roll, please, by that last
24 sentence there, are you suggesting that the changes
25 would result or could result in an alteration to branch

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1 If, during the correction of that line of code, we'd
2 got something wrong, we could have potentially caused
3 a problem, or, if, whilst we'd been removing the data
4 and then putting it back in, the data that the
5 postmaster had continued to enter, if we'd made
6 a mistake with that or accidentally deleted a line or
7 anything, then, again, there could have been a problem
8 there. So the other problem that could have happened is
9 that, if the postmaster hadn't been aware that we were
10 doing it and had continued to use the system or
11 accidentally use the system, then we would have
12 overwritten his data, which then would have caused
13 problems with the cash balancing and whatever. He may
14 have had more money or less money in the till than the
15 system was showing because we'd effectively deleted his
16 transactions.

17 **Q.** Thank you. Can we just look, please, at POL00004074.
18 Thank you. This is a transcript of the evidence you
19 gave in the High Court proceedings. I'm afraid,
20 Mr Roll, this is going to be a bit fiddly so please bear
21 with me because I'm going to be asking you about some of
22 the answers that you gave previously, all right?

23 Can we look, please, at page 34 of this document and
24 look at the bottom left-hand quadrant, which has got the
25 internal pagination 130. Can we pick it up from line

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1 data that could affect branch accounts?

2 **A.** Yes.

3 **Q.** Why would, if you can remember, if you can help us,
4 making a change to the counter configuration do that?

5 **A.** The main one I remember is that, if the database had
6 become corrupt, if one of the transactions hadn't been
7 recorded correctly, then, although the postmaster would
8 continue to work and everything on the post office side
9 of things, on the counter would seem to be working
10 correctly, in effect, the system would be writing data
11 into the database but none of that data would then be
12 copied across to other counters or up to the servers
13 where it would be processed.

14 So, from that side of things, there could be
15 a discrepancy because the postmaster had been working on
16 the counter and yet the systems further up the line
17 wouldn't know he had done any work on it because the
18 correction would have prevented that data from being
19 read. We could then go in, into the counter, and
20 basically just correct it so that things would work
21 properly and then the data then would be harvested.

22 However, to do that, we had to take all the data off
23 the counter from the point of the corruption, save it
24 all, correct the line of code which had been corrupted
25 and then put all of the data we'd taken off back in.

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1 21, please. Here you're being asked questions by the
2 Post Office's barrister, or one of them, and he says,
3 quoting from your witness statement:

4 "Still on the subject of remote access to branch
5 systems, as I recall some errors were corrected remotely
6 without the subpostmaster being aware'."

7 He says:

8 "Those errors are not errors -- or rather those
9 corrections were not corrections which changed branch
10 ..."

11 Then if we go to the top of the next page, the
12 sentence was:

13 "... which changed branch accounts in the way we
14 discussed?"

15 You answered: "No.

16 "You're talking about other errors, aren't you?

17 "Yes."

18 Question: "Could you give some examples of the kind
19 of errors you are talking about?"

20 Answer: "I can't remember, I'm afraid."

21 Then he says: "But it would be things like changing
22 configuration items?"

23 You said: "Probably, yes."

24 He said: "That sort of thing, which would not have
25 an impact on the branch accounts in the way that we have

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1 previously discussed?"

2 You said: "I think so, yes."

3 That exchange there, and it may be difficult to
4 piece together the effect of your evidence from the
5 question and answers, but were you saying there that
6 changes to counter configuration would not have
7 an impact on branch accounts?

8 **A.** I can't remember exactly now. I wouldn't, I couldn't
9 definitely say that the change in the configuration
10 would or wouldn't have an effect. I just can't remember
11 that much information.

12 **Q.** That's very fair. Thank you very much.

13 Can we look, then, to the different routes that
14 might be taken to remote access and can we have back up
15 the fifth page of your Inquiry witness statement.
16 Page 5, at the foot of the page, paragraph 10. If you
17 just look, you say:

18 "I think there are several ways to connect to the
19 counters but it was a long time ago and I can't remember
20 the exact details. As I recall ..."

21 Then you say (a), and then if we go over the page
22 there's a (b) and a (c). So there's three ways that you
23 recall, it being a long time ago and without you
24 remembering exact details, ways to connect to the
25 counters.

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1 **A.** Yes.

2 **Q.** So, to that extent, it's visible and would be apparent
3 to somebody looking, after the event, over who made
4 a relevant entry?

5 **A.** Yes. The problem with that way of doing things was
6 that, the way the system worked, it would -- if it was
7 then harvesting transactions, it would be looking
8 through and seeing everyone with CTR001. As soon as it
9 came to one that said RWR001 it wouldn't recognise it
10 and there would be errors or it may not process it. It
11 might be that it just skipped them and carried on with
12 the rest of it and didn't flag an error. So then there
13 could be -- if we tried to correct an accounting error
14 or something with the system, it might be that the error
15 wasn't corrected at all and it just skipped it.

16 **Q.** So, although you might be able to log in and use this
17 route into the system, you might be able to make
18 a correction. By doing -- making the correction, the
19 fix, you were creating one that was either ineffective
20 or could cause other problems?

21 **A.** Yes.

22 **Q.** Did you use that method much, then?

23 **A.** At times it was -- at times that's -- certainly when we
24 knew it wouldn't cause a problem, we would use it. More
25 for when we were doing things, I think, on the actual --

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1 I'm just going to go through each of those three
2 ways, if you don't mind.

3 **A.** Yeah.

4 **Q.** The first way, (a), if we just go back, please. Thank
5 you:

6 "We could log into the Horizon servers using our own
7 login details and then use the Riposte system to access
8 the counters -- any changes we made to the counter
9 database would then have our login details attached ..."

10 So in that way, you were using your own log-in
11 details, you were going through the Riposte system to
12 get into the counters and, therefore, any changes would
13 have your log-in details against them; is that right?

14 **A.** Yes, in the database, from what I recall, if the
15 postmaster was doing transactions, he would be logging,
16 for example, as CTR001. So every line of code in the
17 database would start with CTR001 to identify that
18 postmaster. If we logged in through Riposte, through
19 this way, in my example it may be my code was RWR001, so
20 any transactions or changes I made would start in the
21 database with RWR001. So anybody coming along later
22 would see straight away that it wasn't CTR, it was RWR
23 who had made the changes and put the data in.

24 **Q.** So there would be a record, an audit trail, as it were,
25 of your actions and what you had done?

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1 either on the routers or the servers themselves and not
2 the counters.

3 **Q.** Why on the routers and servers rather than counters?

4 **A.** If we were needed -- I can't remember exactly but
5 sometimes you could change the data as it came into the
6 system or while it was in -- as it came into the servers
7 or while it was already on the servers, in that way you
8 didn't need to go into the counters at the Post Office
9 to change it.

10 **Q.** Thank you. Can we turn to the second way that you
11 describe, in your (b):

12 "We could log in through Riposte another way,
13 I can't remember the details, in which case it would be
14 difficult to see who had made changes ..."

15 **A.** Yeah, there was a way of logging in and it wouldn't have
16 a user ID. This is my recollection. It's not
17 necessarily 100 per cent accurate but, from what
18 I remember, then instead of having CTR001 or RWR001,
19 that area would be blank. Again, that would then
20 probably cause processing issues at some point later on,
21 or it may not, depending on which bit of data we were --
22 was being changed.

23 **Q.** Why might you use this way?

24 **A.** I can't remember. I know that it was possible to do it,
25 but I can't remember why it would be done. Maybe it was

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1 to change actual parameters and not actual data,
 2 reference data parameters or something. I can't
 3 remember.

4 **Q.** Again, can we just look back at when you were asked
 5 questions on what might be the same topic. I just want
 6 to check that they are in your answers given in the
 7 Group Litigation Order trial.

8 So can we have up again POL00004074, and go to
 9 page 30, please. Go to the bottom right-hand quadrant
 10 of the page, which should be internal pagination 116.
 11 Can we pick it up, please, at line 22.

12 This is again the Post Office's barrister
 13 cross-examining you. He says:
 14 "And the second sentence ..."
 15 Just so you've got some context here, he's putting
 16 part of Mr Godeseth's witness statement to you, okay?
 17 He's reading it to you, Mr Godeseth's witness statement,
 18 and he says:
 19 "And the second sentence:
 20 ""The Riposte product managed the message store and
 21 it did not allow any message to be updated or deleted,
 22 although it did allow for data to be archived once it
 23 had reached a sufficient age ..."
 24 You say: "Yes."
 25 He asks: "It is correct, isn't it, that Riposte

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1 **Q.** Why were you describing it as a "hack"?
 2 **A.** Because it wasn't the way things were supposed to be
 3 done. I don't think it was, anyway.

4 **Q.** Why was it being done in a way that wasn't supposed to
 5 be done?
 6 **A.** Because that was the only way we could get the system
 7 back up and running. It was a workaround.

8 **Q.** Was it just you doing it or were other people in the SSC
 9 doing it?
 10 **A.** Everybody was doing it.

11 **Q.** Was it --
 12 **A.** (Unclear)

13 **Q.** I'm sorry, I missed your answer there?
 14 **A.** Yeah, we had unrestricted access. Basically, we could
 15 do whatever we wanted. So everybody did it when we had
 16 to.

17 **Q.** Was this known about by your deputy manager of the SSC
 18 and the manager of the SSC?
 19 **A.** Oh, definitely, yes.

20 **Q.** How would they know that everyone in the SSC was doing
 21 it?
 22 **A.** Well, they -- it was the other members of the SSC who
 23 taught me how to do it. That was the accepted way of
 24 doing it, in some instances.

25 **Q.** Was it reduced to writing, this hack?

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1 didn't allow any transaction line in the message store
 2 to be individually deleted or changed or edited in any
 3 way?"

4 You replied: "You couldn't do it through Riposte,
 5 no. You had to hack the system to do it."
 6 Just stopping there, what did you mean by "You had
 7 to hack the system to do it"?

8 **A.** There was another way of running Riposte from -- I can't
 9 remember whether it was our counters or from the server,
 10 where you could create a session in Riposte, I think it
 11 was.

12 Then you could use Riposte to insert data, but then
 13 that restricted very much what you could do. So what we
 14 were doing, going through the (a) and (b) I've just
 15 described, was effectively hacking the system. What
 16 they're talking about here is using Riposte to do the
 17 stuff for you directly, actually opening up the Riposte
 18 session, as it were. So it's like using Microsoft Word
 19 or a text editor, but you can either use Microsoft Word
 20 to edit a nice document or you could open it up in
 21 a text editor, if you knew what you were doing, and do
 22 it, you know, through the backdoor, as it were. We were
 23 doing it through the backdoor.

24 **Q.** Why --
 25 **A.** I don't know if that's --

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1 **A.** Sorry?
 2 **Q.** Was it reduced to writing? Was it written down anywhere
 3 that this is the way you do it?
 4 **A.** I don't know. I know that, from things I've read, that
 5 there were problems later when the auditors came in and
 6 found out we were doing it. So quite possibly. I mean,
 7 to start with, I don't think anything was written down.
 8 It was all very much flying by the seat of your pants,
 9 as it were.

10 Things got written down internally as we went along
 11 and then gradually the documentation built up from that.
 12 That was one of the problems with the system to start
 13 with: that there was no documentation. It was all
 14 a scratch -- you know, it was all scratched together,
 15 sort of thing. It was a mess.

16 **Q.** Can we leave this transcript for the moment -- I'm
 17 afraid we're going to come back to it in a second and
 18 pick up the rest of what you said -- and go to what
 19 I think you might be referring to when you said that it
 20 was picked up. Can we turn up FUJ00088036. Can you see
 21 that this is a document dated August 2002, so it's about
 22 halfway or so through your time in the SSC.
 23 **A.** Yeah.

24 **Q.** It's described as "Secure Support System Outline
 25 Design". You're not listed as a contributor or

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1 a reviewer, nor a person to whom the document would, in
2 due course, be distributed but I just want to ask you
3 a question about a passage in it to see whether it
4 reflects your experience in the SSC. Can we turn to
5 page 15, please. It's under paragraph 4.3.2. It's the
6 "Third line and operational support". It reads:

7 "All support access to the Horizon systems is from
8 physically secure sites. Individuals involved in the
9 support process undergo more frequent security vetting
10 checks. Other than the above controls are vested in
11 manual procedures, requiring managerial sign off
12 controlling access to post office counters where update
13 of data is required. Otherwise third line support has
14 ...

15 The first bullet point:

16 "Unrestricted and unaudited privileged access
17 (system admin) to all systems including post office
18 counter PCs ..."

19 Is that what you were referring to?

20 A. Yes.

21 Q. Is it true that the third line support had unrestricted
22 and unaudited privileged access to all systems,
23 including subpostmasters' counter PCs?

24 A. Yes.

25 Q. Was that widely known within the SSC?

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1 You said: "I believe theoretically, it would."

2 He asked: "How would that be possible? Riposte
3 wouldn't allow you to do it, would it?"

4 You say: "By doing the system I have just said. If
5 you could -- without the message store replicating, so
6 there's no other copies of it, if you could get that
7 message store off, alter the data in some of the lines
8 of code, to do that you would need to strip out all of
9 the preamble and the post-amble, so you're then just
10 left with the basic data as if it had been on the stack
11 or whatever -- forgive me, I'm very rusty on this -- but
12 then by -- I think it was the Riposte import but it
13 might have been something else, you could then re-inject
14 that data which is the process we would have used to
15 rebuild the counter. But if you had changed some of
16 that data, I think it would have rewritten the CRC when
17 it imported it so that when it replicated, the data
18 could theoretically have been changed."

19 Counsel says: "I'm finding it difficult to follow
20 you, and it may be my fault."

21 The judge says: "I follow what the witness is saying
22 but keep exploring it."

23 The Post Office barrister said: "I would like to
24 distinguish though between transactions insertions --
25 the process of injecting particular transactions into

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1 A. Within the SSC, yes.

2 Q. Was it known, to your knowledge, outside the SSC?

3 A. No.

4 Q. Plainly, by the time of this document it was.

5 A. Yeah, by this time it must have been, but I wouldn't
6 think widely known. I wouldn't think Post Office would
7 have been probably aware of it.

8 Q. Why wouldn't you think Post Office would be aware of it?

9 A. Well, as the customer, I think they would be -- or they
10 should have been -- very concerned, if they were aware
11 that we had that sort of access. At the time I was
12 working there, I just accepted that this was, you know,
13 the practice. It's only since then that I've come to
14 realise that, actually, it's pretty shocking the amount
15 of access we did have.

16 Q. Can we go back, then, to the transcript. POL00004074,
17 page 30. In fact, we'd gone on to page 31. Breaking
18 off, as we had, just after your answer about the hack,
19 you said:

20 "You couldn't do it through Riposte, no. You had to
21 hack the system to do it."

22 Then the Post Office's barrister asks you:

23 "So would this be right, then, that it wouldn't be
24 possible to remotely access a counter and change the
25 data on the message store of that counter remotely?"

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1 the message store, which could be done, with the process
2 of actually manually changing a transaction line that is
3 in the message store and you could insert new
4 transactions, couldn't you, but what you couldn't do is
5 you couldn't edit or indeed individually delete lines
6 that were in the message store itself."

7 You answered: "You'd have to delete all of the
8 message from what I remember. Delete all of the
9 messages down to a certain point to the one you wanted
10 to amend and then inject a load more text or insert more
11 transactions in to make the message store and Riposte
12 think it had been put in by Riposte and by the
13 postmaster."

14 That's where your answer ended. Is what you are
15 describing in that big answer on the page above, between
16 lines 14 on the first page down to line 3 on the second
17 page and then, scrolling down, lines 17 to 22 on the
18 second page -- is that what you were describing in your
19 paragraph (b) in your witness statement, that you could
20 go in another way, in which case it would be difficult
21 to see who had made changes and that this was the hack?

22 A. No, it's what I was describing in paragraph (c).

23 Q. I see. So the paragraph (b) of your witness statement,
24 "We could log in through Riposte another way, I can't
25 remember the details, in which case it would be

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1 difficult to see who had made the changes"; can you
 2 explain to us how that was done, then?
 3 **A.** I can't remember how it was done. I just know that you
 4 could do it. The -- you could then have fiddled with
 5 it -- for want of a better word -- with the message
 6 store but, without the correct user ID at the start of
 7 every message, then there would have been errors, things
 8 wouldn't have been processed properly, from what
 9 I remember. So you wouldn't have gone in that way to
 10 make changes to the message store.

11 **Q.** Okay can we go back to your witness statement, then, to
 12 page 6 of the witness statement, and look at (c), the
 13 third way.

14 "We could go directly through the communication
 15 servers to the [Post Office] gateway and then the
 16 counter -- if the [postmaster] wasn't logged in then
 17 there would be no ID attached to the database entries,
 18 which sometimes caused the batch processing to fail
 19 overnight; if the [postmaster] was logged on then any
 20 changes we made would have their ID attached -- so as
 21 far as the system (and any auditing) was concerned the
 22 [subpostmaster] would have been responsible for the
 23 transactions."

24 **A.** That's what I was trying to say. I think that's what
 25 I was trying to say in the Post Office transcript we

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1 I'm just trying to remember something else. I was going
 2 to say if the postmaster had gone to lunch, for
 3 instance, we could have gone in and done things without
 4 him knowing. There may have been a way to put the data
 5 in at the counter while the postmaster was actually
 6 logged off. There may have -- I can't remember exactly
 7 but there may have been a way to fool the counter into
 8 thinking that the postmaster that logged on to do it.
 9 I can't fully remember that.

10 Certainly, we were on occasion asked -- I can't
 11 remember the details. I know that since the court case,
 12 it may be during the court case, I saw documentation to
 13 the effect that we had at times gone into the counter
 14 without the postmaster or even POL knowing to make
 15 changes to the data and, in the way that I'm talking in
 16 item (c) here. So the postmaster may have logged on and
 17 gone to lunch and left the computer logged on, so then
 18 we went in, made the changes we needed to fix the
 19 problem, and then logged out again, leaving the
 20 postmaster completely unaware that we'd done it.

21 **Q.** Can we go over the page on your witness statement,
 22 please, to look at the security protocols about
 23 accessing subpostmasters' systems, and look at
 24 paragraph 15. You say:

25 "The Inquiry has asked about security protocols

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1 just looked at.

2 **Q.** Thank you. Was this a method that you used frequently,
 3 as described in subparagraph (c)?

4 **A.** We were all pretty adept at it, yeah.

5 **Q.** Whether you were adept at it --

6 **A.** Fairly frequently, yes.

7 **Q.** Fairly frequently?

8 **A.** Yes.

9 **Q.** Okay. Why did you use that method?

10 **A.** It was the only way to rebuild the counters to get the
 11 data off the counters.

12 **Q.** The footprint that was left would have been the
 13 subpostmaster's footprint and not yours?

14 **A.** Yes.

15 **Q.** Was there any visibility that you or somebody else in
 16 the SSC had done this as opposed to the subpostmaster
 17 themselves having done it?

18 **A.** Sometimes yes, sometimes no.

19 **Q.** What would distinguish?

20 **A.** We would -- sometimes it would be recorded. I'm a bit
 21 rusty on this now, I'm afraid, but sometimes we told the
 22 postmaster we were going to do it. While we were doing
 23 this, the postmaster couldn't use the counter. It was
 24 very important that nobody used it. At other times,
 25 especially if maybe the postmaster -- I'm just thinking.

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1 regarding access to [subpostmasters'] systems. I don't
 2 remember any security protocols; we sometimes connected
 3 to [post office] counters without the postmaster being
 4 aware that we were 'looking over their shoulder'. In
 5 the early days, I frequently logged on to counters to
 6 see what was happening; there was no record of my doing
 7 so but I think this changed after I had left."

8 **A.** Yeah.

9 **Q.** Can we look, please, at the transcript again of the High
 10 Court trial. That's POL00004074, page 33, please. It's
 11 the bottom left hand quadrant and it's line 22, the foot
 12 of the page. This is partway through your answer. You
 13 say:

14 "In circumstances we could do that. In other
 15 instances, the way I remember it is that for the system
 16 to operate correctly for the accounting, it had to be
 17 the same user ID logged on, so that the postmaster or
 18 that clerk or whatever would have to be logged on with
 19 their ID and password so that any data we changed or put
 20 back on would then go in with their ID, which is why
 21 they couldn't use it. Then that data would be picked up
 22 correctly by Riposte. Riposte would assume that the
 23 postmaster had been operating as normal and would accept
 24 the data into the message store and process it
 25 correctly."

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1 Question: "Could you tell me what were the
2 circumstances in which you had to use the same ID as the
3 original user?"

4 Answer: "I can't remember what the differences were
5 for the different errors but it depended on what error
6 was coming up and what bit of data was corrupt, where
7 the corruption lay in the message store."

8 Question: "So you can't think of a specific reason
9 why it would have to be the same person but you're
10 saying that it did sometimes?"

11 Answer: "Yes, it -- sorry. I didn't let you finish.
12 I've lost my train of thought now, sorry. It often made
13 it much cleaner for accounting reasons. From what
14 I remember, if it was the same user ID, all of this, all
15 of these actions would be detailed in the PinICL and if,
16 from what I remember, if you were accessing the counter
17 in this way, two people had to be there, one was
18 an independent witness, to make sure that everything was
19 going correctly."

20 Just stopping there, are you describing here that
21 there needed to be two people, one of whom was
22 an independent witness, to witness the hack that you've
23 described?

24 A. If you were making changes to the database and putting
25 data in, then yes. They would watch as you went through

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1 next line from 16 to 19, that's where, at that point,
2 reading this, I was -- I believed that formal consent
3 from the Post Office was required. It was after this
4 that I saw the documentation that contradicts this and
5 there's actually times when the Post Office weren't
6 informed.

7 Q. So carrying on reading then from 14, just to get the
8 question, he asked you:

9 "Is it also the case that the Post Office consent
10 was always needed for this kind of process?"

11 You said: "I was there we were supposed to speak to
12 the postmaster to get his consent, so from Post Office
13 consent, that's what I believe you mean by that. Formal
14 consent from the Post Office itself, maybe not."

15 Just stopping there, did you always speak to the
16 postmaster to get consent?

17 A. From what I remember now, no. But memory is a funny
18 thing and sometimes, after this length of time, you
19 remember things that didn't actually happen. So I can't
20 completely, hand on heart, say that that's true or not.

21 Q. You mentioned that you had seen something after giving
22 evidence here that had maybe changed your view. What
23 was that?

24 A. There was some documentation that came up right at the
25 end of my interrogation. It may have been right at the

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1 all the steps to clean the data up, just to -- to double
2 check to make sure you hadn't made a mistake and deleted
3 something in error. I think that stemmed from an issue
4 when at some point somebody did make an error and it
5 really messed up the processing later. So that was
6 a lesson learned as we were going along. Again, my
7 memory is very hazy on this but I think that's why it
8 was that we then employed two people to make sure that
9 there weren't mistakes.

10 Q. Then scrolling down, counsel asked you:

11 "So there would have to be what we now call PEAKS
12 and there would have to be two pairs of eyes?"

13 You say: "That was what --"

14 Then he carried on: "It would never be left to one
15 particular member of the SSC to do it on his own?"

16 Answer: "It was never supposed to be, and I don't
17 think it ever was, but I'm not sure."

18 Question: "So this a formal process then, is it?"

19 You answered "Yes."

20 "Which the SSC took very seriously?"

21 Answer: "It was developed and taken very seriously,
22 yes."

23 So did the position change over your time within the
24 SSC?

25 A. I think so, I can't really remember. Also, reading the

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1 end, it may have been right after I left, I saw it and
2 it was a statement, I think it was from Mik Peach,
3 saying that we weren't to inform the Post Office of
4 this, this particular item. I can't remember exactly
5 what it was.

6 Q. Other than the postmaster themselves, do you remember
7 any communication, written or verbal, between you and
8 other members of the SSC team and Post Office managers
9 or somebody within security within the Post Office, or
10 something like that, before you undertook this exercise,
11 this hack?

12 A. No. The only person we would have spoken to for any
13 authorisation would have been Mik, Mik Peach, the
14 manager. Everything came through him, really.

15 MR BEER: Thank you. We can take that down now.

16 Sir, I wonder whether we might unusually ask for
17 an earlier lunch today. There's been some quite heavy
18 transcript that I've gone through with Mr Roll and
19 I suspect that he, but also me, would appreciate a break
20 so can we break for lunch?

21 SIR WYN WILLIAMS: Of course. 1.45?

22 MR BEER: Yes, thank you very much, sir.

23 SIR WYN WILLIAMS: Fine. See you then.

24 MR BEER: Thank you.

25 (12.45 pm)

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(The Short Adjournment)

1
2 (1.45 pm)
3 **MR BEER:** Good afternoon, sir. Can you see and hear me?
4 **SIR WYN WILLIAMS:** Yes, I can.
5 **MR BEER:** Mr Roll, can you see and hear me?
6 **A.** Yes, I can.
7 **Q.** Thank you. Can we have up on the screen, please,
8 POL00000900. Thank you very much. Can you see the
9 title of this document, it's at the top of the page,
10 Mr Roll, and under "Document title", "CS Support
11 Services Operations Manual"?
12 **A.** Yeah.
13 **Q.** It's dated in this version, version 2, 29 January 2001.
14 **A.** Yes.
15 **Q.** That would have predated your arrival in the SSC,
16 wouldn't it?
17 **A.** Yes.
18 **Q.** We've got earlier versions of this in 1999 and 2000 but
19 I'm going to show you this one because it's most
20 proximate to your arrival in the SSC. Can you see in
21 the middle of the page or the bottom of the page there
22 it says, "Owner: Peter Burden"; do you remember who he
23 was?
24 **A.** No.
25 **Q.** At the foot of the page under "Distribution", the

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1 used to correct data on the system when this has been
2 corrupted in some way."
3 That accords with the evidence you have given so
4 far, doesn't it?
5 **A.** Yes.
6 **Q.** "The procedure for doing this is as follows:
7 "The originator of the change:
8 "1. Completes an Operational Correction Request
9 (OCR) form for every change to data on the live system.
10 "The originator may be anyone within ICL Pathway but
11 it is normally the Duty Manager, or a Problem Manager or
12 Business Support Manager when an incident or problem has
13 been caused by an error in the data. It can be
14 completed by an SSC staff member who detects that the
15 data in the system has become corrupted in the course of
16 diagnosing a fault."
17 Then "The originator of the change":
18 "2. Emails the OCR form to an authoriser,
19 electronically signing it where possible, and where this
20 is not possible, telephoning the authoriser to confirm
21 that they are sending an OCR [an Operational Correction
22 Request]."
23 Can we turn to page 39 of the document, please,
24 where we see an OCR form or a template OCR form,
25 an operational correction request. You'll see there's

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1 distribution includes, as the third person there, the CS
2 Support Services Manager. Would that be Mr Peach?
3 **A.** Yes. I think.
4 **Q.** Which one of those would be Mr Peach? Would it be the
5 second one from the bottom, SSC Manager?
6 **A.** Yes, I believe so.
7 **Q.** You'll see that, amongst the distribution lists, is
8 "Pathway document library". Do you remember what that
9 was?
10 **A.** No.
11 **Q.** How were documents like this, this is an operations
12 manual that's about the SSC, promulgated or distributed
13 to people like you that were working essentially on the
14 floor of the SSC?
15 **A.** I don't know. I can't remember ever seeing this.
16 **Q.** Was there an intranet, part of which had a repository
17 for policy and other documents?
18 **A.** I don't think so. I can't remember.
19 **Q.** Can we just look at this, please, because it describes
20 a process that may be relevant to the issue we were
21 discussing before lunch. Can we go, please, to
22 page 39 -- sorry, not page 39 -- page 15, and scroll
23 down to paragraph 4.3. This document says, I'll read it
24 through slowly:
25 "The SSC has access to the live system which can be

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1 a title, who the OCR was raised by, their location, when
2 they raised it, the type of change requested, the system
3 to be changed, a due date, and an associated PinICL
4 number, an authorisation signature, date and position
5 and then, scrolling down, at the foot of the page,
6 "Purpose and details of the change".
7 Then over the page, please, "Regression path", and
8 then "Signature of the SSC", person who did the work,
9 their printed name, the witness, either somebody in the
10 SSC or the fourth line signature, and then name,
11 completion date, "Was change tested on reference rigs
12 prior to application, yes or no", system state before
13 change, system state after change and then, scrolling
14 down, "Comments".
15 Is that a document with which you were familiar?
16 **A.** I don't remember seeing it. I can't remember it.
17 **Q.** Was this something that you, to your memory, had to fill
18 out or somebody had to fill out before they requested
19 you to make a change, it had to be countersigned. You,
20 when making the change, had to sign it and it had to be
21 countersigned by the witness. Was that habitually done?
22 **A.** I can't remember at all seeing one of these documents
23 before.
24 **Q.** If we go back to page 15 of the document, please, at the
25 foot of the page. We had got to paragraph 2 and then it

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1 continues:

2 "The authoriser must be one of the following:

3 "Duty Manager

4 "Business Support Manager

5 "CS Operations Manager

6 "SSC manager

7 "Release manager."

8 Then:

9 "The authoriser:

10 "1. Authorises the change, or reports back to the

11 originator why they are not authorising the change.

12 "2. Forwards the OCR form to the SSC electronically

13 with an encrypted electronic signature file.

14 "The SSC staff member who is to perform the change

15 [I think that would be you]:

16 "3. Checks the electronic signature of the

17 authoriser.

18 "4. Stores the OCR form and the signature file in

19 the received OCRs folder on the SSC server.

20 "5. Wherever possible, produces a script to make

21 the data change and test the script on the SSC reference

22 rig prior to running it on the live system.

23 "6. Completes the relevant sections on the OCR form

24 to confirm whether they have produced and tested

25 a script or not.

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1 That very involved and complicated process, was that

2 something that was habitually done when you were

3 undertaking the category C hacks that you described

4 earlier?

5 **A.** I don't remember doing that, no. We might have done.

6 I just can't remember. I do think that, on occasion,

7 we'd made changes without a PinICL being raised.

8 **Q.** In your answer there, you said that you don't remember

9 whether it was done or not, and it might have been. Is

10 that the category of memory that we're dealing with

11 here, you're saying this could perfectly well have been

12 undertaken on each occasion, you simply now don't

13 remember it?

14 **A.** That's right, yeah, I don't think it was undertaken.

15 I don't remember it being undertaken at all but I can't

16 remember.

17 **Q.** Thank you very much, that can be taken down from the

18 screen now.

19 Can we look, please, at POL00023432. This is

20 an email exchange in 2008, so four years after you left,

21 in which you were not involved. If we just look at the

22 second page, please. The Inquiry is familiar with this

23 but I just ought to give you some context first. It

24 concerns a subpostmaster saying to somebody on his area

25 that, on a number of occasions, figures have appeared in

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1 "7. Prior to making the change ... documents the

2 state of the affect part of the system and completes the

3 regression path details on the OCR form ...

4 "8. Makes the change on the live system.

5 "At least two people must be present when making

6 changes to the live system. Normally these are SSC

7 staff, but can be one SSC staff member and one person

8 from the fourth line support unit responsible for the

9 area in which the data change will take place, or one

10 SSC staff member and one OSD staff member

11 "9. On completing the data change, documents the

12 state of the affected part of the system and mails

13 an electronically signed copy of the OCR form to the

14 second person who was present whilst making the change.

15 "10. The second person also electronically signs

16 the form and emails it to either the SSC manager or the

17 SSC website controller.

18 "11. Updates the PinICL and reports back to the

19 originator to confirm that the change has been

20 completed."

21 Then:

22 "The SSC Manager or SSC website controller:

23 "12. Checks the electronic signatures.

24 "13. Files the OCR in the complete OCR folder on

25 the SSC server."

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1 the cheque line of his account.

2 Do you see, in numbered paragraph 1, he, the

3 subpostmaster, that's Mr Graham Ward:

4 "... claims that on a number of occasions figures

5 have appeared in the cheques line of his account. He

6 suspects that these have been input into his account

7 electronically without his knowledge and consent. He is

8 certain that he has cleared and remmed out cheques in

9 the right way and tells me that cheques must be properly

10 cleared on the system to progress to a new account.

11 Then paragraph 2:

12 "He has made good about £10,000 and not made good

13 about £11,000 of the shortages which arise from these

14 figures. He claims that because of the abnormal nature

15 of these entries, the shortages have not just rolled

16 over from one branch trading statement to the next, but

17 have accumulated -- each being added to the last (eg if

18 the account in period one showed a shortage of £100

19 which was not made good, then the shortage shown in

20 period 2 would be £200)."

21 So it was doubling up, week on week.

22 Had you heard of any similar issue when you were

23 working in the SSC?

24 **A.** I have heard of similar issues but I can't remember if

25 I remembered them from when I was there or whether it's

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1 things I have read since in the reports about the court
 2 case, and so on and so forth.

3 **Q.** So, very fairly, you're distinguishing between your real
 4 memory of events in which you were involved, and things
 5 which you read and heard afterwards?

6 **A.** Yeah, I can't remember whether I was aware of them at
 7 the time.

8 **Q.** Can you help us: what would be the investigation that
 9 would be required within the SSC, if this kind of report
 10 had been made to you?

11 **A.** Other than going through the transactions and the number
 12 of cheques -- to look at the number of cheques coming in
 13 and out and trying to work out where the figures were
 14 being generated, using extracts from the database
 15 I can't really remember much more about that, apart from
 16 that.

17 **Q.** Would you examine the code that has undertaken the task
 18 of putting in cheques in and out?

19 **A.** I think we would only have gone to examine the code if
 20 we could find exactly where in the message store the
 21 problem was occurring. The problem is that there is so
 22 much code that, if you don't go in without -- if you go
 23 in without any sort of reference point, it would be like
 24 trying to find a paragraph or an apostrophe in *War and*
 25 *Peace*. You wouldn't know where to start. You'd need to

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1 on and deal with that separately.

2 **SIR WYN WILLIAMS:** Let's just check, are there other people
 3 who want to ask questions?

4 **MS PAGE:** I do want to ask some short questions. I don't
 5 imagine they'll take very long.

6 **SIR WYN WILLIAMS:** Let's just have a five-minute break, then
 7 and then we'll have all the questions sequentially.

8 **MR BEER:** Thank you, sir.

9 (2.03 pm)

(A short break)

11 (2.12 pm)

12 **MR BEER:** Can you see and hear us again?

13 **SIR WYN WILLIAMS:** I can.

14 **MR BEER:** I think we're now ready, if Mr Roll is ready for
 15 questions from Mr Stein.

16 **SIR WYN WILLIAMS:** Yes.

17 **Questioned by MR STEIN**

18 **MR STEIN:** Sir, first of all thank you for the time. It has
 19 been of assistance in narrowing down the focus of any
 20 questions.

21 Mr Roll, I appear on behalf of a large number of
 22 subpostmasters and mistresses. I've got one question to
 23 ask you arising out of the questions asked by Mr Beer
 24 this morning and this afternoon. You've discussed with
 25 Mr Beer what can happen when a computer system being

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1 know where in the data store, what was going on from the
 2 data store, from the database, to give you some idea as
 3 to where to start looking. That's what I remember.

4 **Q.** So how, practically, would -- if this is all you've got
 5 to go on, how practically would you go about it?

6 **A.** First step would be to download messages from the
 7 message store and start trying to follow through what
 8 the figures were and try to work out what was happening
 9 with the figures.

10 **Q.** Would you be able to see from the message store this
 11 doubling up that the subpostmaster is referring to?

12 **A.** You would probably see that the figures had doubled.
 13 Whether you would be able to work out exactly why, I'm
 14 not sure. My memory -- it's a long time ago and I just
 15 can't remember, I'm afraid.

16 **MR BEER:** Mr Roll, thank you very much. They're the only
 17 questions that I ask you. There may be some other
 18 questions from other Core Participants. Can I just
 19 check?

20 **MR STEIN:** Sir, I may like to ask a question of Mr Roll.
 21 I just need to take instructions. May we have
 22 a five-minute break now before I do so?

23 **SIR WYN WILLIAMS:** Of course.

24 **MR STEIN:** Or leave it to my learned friend's who may want
 25 to ask questions on behalf of their own clients to carry

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1 used by a subpostmaster had a dodgy on/off button; do
 2 you remember that?

3 **A.** Yes.

4 **Q.** Now, you explained in your evidence, I believe this
 5 morning, that that could lead and did lead to a loss of
 6 data integrity within that system being used by that
 7 branch; is that correct?

8 **A.** Yes.

9 **Q.** Can we therefore assume that losses of power would also
 10 have the same effect, in other words losing data
 11 integrity within that particular branch system?

12 **A.** I suppose there is the potential, the big loss of
 13 integrity with this particular instance was that, from
 14 my recollection, although the data was on the computer
 15 it wasn't getting through to the systems or not getting
 16 through correctly, so then it wasn't being processed
 17 correctly.

18 **Q.** Right, so there's a potential for losing data when the
 19 power goes but there's also, in your recollection,
 20 difficulties with data integrity when there's
 21 a connectivity issue; is that correct?

22 **A.** Yes.

23 **Q.** Okay. Now, if the branch loses connectivity with the
 24 rest of the Horizon System for, I don't know, cable
 25 reasons or some other hardware reason, can that lead to

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1 the same problem in isolating that branch from the rest
2 of the system and losing data?

3 **A.** The data would hopefully still be on the computers in
4 the branch but, certainly from an estate or from the
5 server perspective, it would be as if that Post Office
6 had closed and was not operating. So the data wouldn't
7 be visible from the servers until it was switched back
8 on and the data had managed to replicate through
9 overnight.

10 **Q.** Right. Would it always recover? We know that it was
11 meant to, but would it always?

12 **A.** If there was a power failure or if it had suddenly been
13 cut off then there's always I suppose the potential
14 damage, hardware damage to the disk or some of it --
15 maybe boards in the computer. So, from that
16 perspective, if the computer was made inoperable then
17 you would lose the data. So those transactions would
18 have been lost. There's the potential, then, that if
19 you can't recover any of the data from the disk, then
20 without a paper audit trail, you wouldn't know what had
21 gone on in the counter -- in the post office that day.

22 **Q.** Okay, my last question on this: were these problems, to
23 your recollection, explained to subpostmasters and
24 mistresses as being a potential difficulty that could
25 lose data?

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1 **A.** Yes.

2 **Q.** You finally corrected me. I just wanted to show you the
3 third one. It was, in fact, an amended version of the
4 second one; is that right?

5 **A.** I can't remember. It may well have been, yes.

6 **Q.** We've got this on the screen now and we can see that the
7 amendments to it are in red. You can see that in the
8 tramlines, and we can see a further date of it, if we go
9 to the last page, page 8., and scroll down. We can see
10 where you re-signed it.

11 **A.** Yes.

12 **Q.** It'll have "GRO" on it. That's covering up your
13 signature so people can't use it.

14 **A.** Yes.

15 **Q.** There was only one passage in this witness statement
16 that I took you to that's the subject of amendment, and
17 so I should take you back to it and ask you about the
18 amendments. So can we look, please, at the bottom of
19 page 2 and scroll down, please, to paragraph 8. Can you
20 see paragraph 8 with the amendments in red? You're here
21 also dealing with the laptop standby/switch-off power
22 issue and what happened when you raised it with your
23 manager. At the foot of the page, in your amended
24 statement, you say:

25 "When I raised this with my manager Mik Peach, he

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1 **A.** I don't know, I don't remember, well I don't remember
2 ever explaining that, and I'm pretty sure I didn't.
3 Whether anybody else on the installation teams had
4 explained this to postmasters, I don't know.

5 **MR STEIN:** Thank you, Mr Roll.

6 **Questioned by MS PAGE**

7 **MS PAGE:** Mr Roll, it's Flora Page here, also representing
8 a number of the subpostmasters. You mentioned earlier
9 the system or tool known as Tivoli, which dealt with the
10 automated system driven alerts; is that right?

11 **A.** Yeah, but I can't remember much about that at all, I'm
12 afraid.

13 **Q.** No, okay. Just one question, then: do you remember
14 there being any sort of routine or process around it or
15 were those alerts just dealt with in exactly the same
16 way as a call coming in from an SPM?

17 **A.** I can't remember, I'm afraid.

18 **MS PAGE:** All right. Thank you very much.

19 **Further questioned by MR BEER**

20 **MR BEER:** Sir, I think those are all of the questions from
21 everyone. There's just one thing that I'd like to do
22 before Mr Roll finishes giving his evidence, and ask for
23 POL00000678 to be displayed. You mentioned, Mr Roll,
24 earlier, that you'd made three witness statements not
25 two, when I --

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1 initially told me not to do anything until he had spoken
2 to someone about this. Mik did subsequently talk to the
3 hardware team, at which point I found out this was
4 a known problem ..."

5 Then at the end, you added the sentence:

6 "I was told by Mik Peach not to include any details
7 of this when I closed the PinICL."

8 Were the amendments that you made to your witness
9 statement, in one case amending an order of events, and
10 in the second by adding a sentence at the end, correct?

11 **A.** They were correct, yes. I think I was trying to clarify
12 it.

13 **MR BEER:** Yes. Thank you very much. They're the only
14 questions that I ask you, Mr Roll. Thank you.

15 **SIR WYN WILLIAMS:** Mr Roll, I'm very grateful to you for
16 giving your evidence to the Inquiry. As is obvious to
17 everyone, you have been involved in providing assistance
18 to those who are seeking to unravel what has occurred
19 over very many years, and I don't think I can do other
20 than thank you for that, as well. So on many fronts,
21 thank you very much, Mr Roll.

22 **THE WITNESS:** Thank you.

23 **MR BEER:** Sir, that's it for our witnesses this week and
24 indeed this month. Our next hearing I think is
25 scheduled to occur on 27 April in relation to

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1 compensation issues, perhaps including bankruptcy and,
 2 depending on the position as it's developed by then, tax
 3 issues. So that is our next hearing date.
 4 **SIR WYN WILLIAMS:** I know that you're right, Mr Beer. Can
 5 I say that, whereas in the previous hearings I have in
 6 effect invited the parties who wish to make written
 7 representations and speak to say whatever it is that
 8 they want to say, this hearing may be a little more
 9 focused in that I might well take the lead in
 10 determining what should be the subject of either written
 11 or oral submissions. In any event, over the course of
 12 the coming couple of weeks, I hope, I will issue formal
 13 directions as to how we intend to proceed.
 14 **MR BEER:** Thank you very much, sir.
 15 **SIR WYN WILLIAMS:** All right, then. If not before,
 16 27 April.
 17 **MR BEER:** Thank you, sir.
 18 **(2.22 pm)**
 19 **(The hearing adjourned until 27 April 2023)**
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I N D E X

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