

IN THE MATTER OF
THE POST OFFICE HORIZON IT INQUIRY

25 October 2023

**THIRD DISCLOSURE STATEMENT ON BEHALF OF
FUJITSU SERVICES LIMITED**

1. I, Christopher Mark Breen, of Lovelace Road, Bracknell, England, RG12 8SN, am a solicitor at Fujitsu Services Limited (“**Fujitsu**”). I am a disputes lawyer by background and my current job title is Legal Manager - Litigation for Europe.

INTRODUCTION

2. My professional background and involvement in respect of the Post Office Horizon IT Inquiry (the “**Inquiry**”) are set out in the first disclosure statement made by me on behalf of Fujitsu, which was dated 24 November 2022 (the “**First Disclosure Statement**”).
3. I have been provided with a copy of the letter from the Inquiry to Fujitsu dated 12 July 2023 (the “**Disclosure Statement Request**”), requesting a disclosure statement from Fujitsu in respect of the following discrete issues:
- (a) Item 1 – Call Scripts: the disclosure process Fujitsu has undertaken to ensure all relevant call scripts have now been disclosed to the Inquiry (the “**Call Scripts Issue**”). The Call Scripts Issue is addressed at paragraphs 19 to 54 of this statement; and
 - (b) Item 2 – ARQ Documents: the disclosure of certain documents on 9 and 21 June 2023 which related to an identified problem in the completeness of ARQ data, raising potential implications for witness statements that Fujitsu

employees had provided or would provide in relation to prosecutions brought by the Post Office (the “**ARQ Issue**”). The disclosure of documents relevant to the ARQ Issue is addressed at paragraphs 55 to 83 of this statement.

4. I understand from the Disclosure Statement Request that the Inquiry is seeking a statement “*in order to provide assurance to the Inquiry and Core Participants in respect of*” Items 1 and 2 above, and that the Inquiry is not seeking a general disclosure statement at this time.

OVERVIEW OF THE POINTS ADDRESSED IN THIS STATEMENT

5. This statement is structured as follows:
 - (a) Summary of Fujitsu’s Responses to the Disclosure Statement Request (pages 2 to 6);
 - (b) Fujitsu’s Approach to Rule 9 requests for documents (pages 6 to 7);
 - (c) Item 1 – Call Scripts (pages 7 to 25); and
 - (d) Item 2 – ARQ Documents (pages 25 to 34).

SUMMARY OF FUJITSU’S RESPONSES TO THE DISCLOSURE STATEMENT REQUEST

Call Scripts

6. In relation to Item 1 of the Disclosure Statement Request, concerning call scripts, FSL has identified and disclosed the documents set out in paragraphs 22 and 35 below, including scripts and guidance notes that were intended to be used by operators working on the Fujitsu Helpdesk (defined below) during the relevant period.

7. Despite the efforts and actions set out below in paragraphs 19 to 54, regrettably Fujitsu has not identified the call scripts which were to be used by Fujitsu Helpdesk operators when dealing with calls seeking guidance on the cash account functionality in the Horizon system.
8. As set out in paragraph 23 below, Fujitsu understands that such scripts were created and used by Fujitsu from at least July 1999. Fujitsu's investigations involved the review of documents collected into its Relativity platform, interviews with current employees who worked on the Fujitsu Helpdesk throughout the relevant period, and also searches of documents which had not been collected into Fujitsu's Relativity platform. Some of the employees interviewed recalled using hard copy scripts. More generally, they recalled that Fujitsu Helpdesk operators had access to guidance notes contained in a database, and some of the employees recalled that this database was called HSD One or HSH One. For the purposes of this Disclosure Statement, I refer to this database as "HSH One".
9. FSL's investigations indicate that Fujitsu Helpdesk operators used HSH One from approximately 2003. HSH One contained guidance notes referred to as knowledge articles or "HSD KELs" which were intended to be used by operators when dealing with known issues on end user calls. HSH One, which was later renamed HSD One, was retired in approximately 2009 and some or all of its contents were migrated to a new database known as "Triole for Services" ("**TfS**"). TfS was used by Fujitsu to service various customers, including the Post Office.
10. Fujitsu has identified indices of the contents of HSH One used by the individuals working on the retirement of that database and the migration of its contents to TfS

(Inquiry URN POINQ0230372F). The indices point to the database having contained knowledge articles with various unique identifiable references, as was the convention for knowledge articles generated and maintained by the SSC team. Some knowledge articles have been identified and disclosed from hard copy records which Fujitsu has collected from premises used by Fujitsu Helpdesk staff and from some of the staff themselves. TfS was in turn retired in 2019, following which Fujitsu's Post Office Account archived a copy of certain TfS data relevant to the Post Office. As set out in paragraph 51 below, I understand this archive did not contain HSD KELs. Therefore, Fujitsu has procured a central back-up of the TfS archive prior to its retirement (the "**TfS back-up**"), and has isolated the records relating to the Post Office. These records include the underlying text data of certain HSD KELs. Fujitsu has undertaken steps to retrieve this data and convert it into a reviewable form. As a result, a copy of the underlying text data has been extracted into an excel document, which was produced to the Inquiry on 31 July 2023 (Inquiry Control Number POINQ0230376F). Fujitsu can make available to the Inquiry the remainder of the data relating to Post Office stored on the TfS back-up, to the extent it would assist the Inquiry.

ARQ Documents

11. On 9 June 2023, Fujitsu disclosed a presentation titled "Prosecution Support Urgent Issue"¹ (the "**Presentation**") to the Inquiry. The Presentation was prepared in December 2008 and referred to the discovery of a bug which called into question the accuracy of witness statements enclosing ARQ data that had been provided

¹ (URN: FUJ00154835, Control No: POINQ0161030F)

by Fujitsu employees in legal proceedings involving postmasters. As part of the same production on 9 June 2023, Fujitsu also disclosed 23 additional documents (plus family documents) related to the Presentation and/or Phase 4 of the Inquiry (the “**9 June Related Documents**”).

12. The Presentation was brought to my attention on 8 June 2023. I instructed Morrison & Foerster (UK) LLP (“**Morrison Foerster**”) to conduct further investigations into documents relevant to the Presentation and the issues it raised, so as to identify any documents for disclosure (in addition to the 9 June Related Documents). As a result, a further 175 documents (plus family documents) were disclosed to the Inquiry on 21 June 2023 (the “**21 June Related Documents**”, and together with the 9 June Related Documents, the “**Related Documents**”).
13. The Presentation had been reviewed by a member of Morrison Foerster’s team around the time Fujitsu was considering its response to Rule 9 Request 2 (“**Request No. 2**”). However, it was not disclosed in response to Request No. 2. While the significance of the document was recognised, in hindsight, Fujitsu and its external legal advisors adopted an overly narrow reading of Request No. 2. As a result, material relevant to the Inquiry’s terms of reference was not disclosed. This is explained in further details at paragraphs 68 to 71 below. On behalf of Fujitsu, I apologise to the Inquiry for the approach that was taken in relation to Request No. 2.
14. The Presentation was not considered for disclosure again until it was reviewed for disclosure at the beginning of June 2023. Fujitsu also apologises for this delay. Not enough was done to ensure that documents that had previously been identified

as relevant to the Inquiry's terms of reference were surfaced to the Inquiry expeditiously. Fujitsu has taken steps to address this issue, as explained in greater detail at paragraph 82 below.

FUJITSU'S APPROACH TO RULE 9 REQUESTS FOR DOCUMENTS

15. As explained in the First Disclosure Statement, documents disclosed in this Inquiry on behalf of Fujitsu are searched and reviewed under the direction of, and by, Morrison Foerster. Although I do not personally undertake these activities, I am responsible for the day-to-day supervision and instruction of Morrison Foerster, including their responses to Rule 9 Requests. The general approach Morrison Foerster takes to the searching and review of documents for production to the Inquiry is set out in detail in the First Disclosure Statement and the second disclosure statement made by me on behalf of Fujitsu, dated 14 February 2023 ("**Second Disclosure Statement**").
16. The Second Disclosure Statement also explains the approach Fujitsu has taken to searching for and preserving documents of potential relevance to the Inquiry. In particular, Fujitsu has available to it many more preserved records than can be ingested into a document review platform such as the Relativity instance used by Fujitsu and Morrison Foerster to respond to Rule 9 requests. Fujitsu has therefore catalogued and prioritised those records which have not to date been ingested into Relativity based on factors including the ease of retrieval.
17. Fujitsu, at all times, has sought to comply with the Inquiry's Protocol on the Disclosure of Documents. However, as noted in the Second Disclosure Statement,

on occasion, it may not be possible to produce *all* relevant documents in response to a Rule 9 request given:

- (a) the scale of the documents involved;
- (b) the potential limitations of using search terms and other search parameters applied to retrieve documents for review; and
- (c) the understandable time limits imposed by the Inquiry when making Rule 9 Requests.

18. In addition, Fujitsu and its legal advisers are required to exercise a degree of judgement as to the interpretation of a Rule 9 request and the relevance of particular individual documents to those Rule 9 requests. Providing every document that might be thought to be tangentially relevant to a Rule 9 Request risks impeding the Inquiry's investigation by providing too many documents.

ITEM 1: CALL SCRIPTS

Background

19. I refer to the summary of the contractual support services provided by Fujitsu in relation to the Horizon system set out in Fujitsu's Second Corporate Statement dated 29 December 2022. This summary informed Fujitsu's understanding of and investigations into the use of call scripts by the Fujitsu support services. In particular, these investigations proceeded on the basis of the information summarised at paragraphs 37 to 39 of the Second Corporate Statement, namely that:
- (a) Fujitsu provided first line support to Post Office branches through the provision of a support desk function, known at various times as the Horizon

Systems Helpdesk or the Horizon Service Desk. In this statement, I refer to these as the “**Fujitsu Helpdesk**”.

- (b) The description of contractual services provided by the Fujitsu Helpdesk varied over time. Further information of Fujitsu’s present understanding of those contractual services are included in: (i) the POCL Infrastructure Service Definition (Inquiry URN FUJ00120447) for services provided before December 2002; (ii) the Service Description for the Horizon Systems Helpdesk (Inquiry URN FUJ00080428) for services provided between December 2002 and October 2006; and (iii) the Service Desk Joint Working Document (for example, Inquiry URNs FUJ00080485, FUJ00080459 and FUJ00080457) for services provided from October 2006 to June 2014.
- (c) In summary, end-users of the Horizon system (including individuals working in Post Office branches) could contact the Fujitsu Helpdesk to report issues and Fujitsu Helpdesk staff would log a call and initiate the incident management process.
- (d) The Fujitsu Helpdesk dealt with calls relating to various types of incidents, including those concerning counter hardware, software and network issues. In late 2002 to early 2003, pursuant to Change control Note No. 1016a (Inquiry URN FUJ00000875), responsibility for calls requiring advice or guidance in using the Horizon system was to be taken over by the Network Business Support Centre (the “**NBSC**”) operated by the Post Office. As described in the Service Desk Joint Working Document, this included responsibility for calls relating to cash account or discrepancy issues.

- (e) In 2014, Fujitsu ceased to provide first line support to the Post Office and this function was transferred to a new supplier, ATOS. This change to the contractual services is recorded in Change Control Note No. 1409a (Inquiry URN FUJ00001104).
20. In or around April 2023, in the context of the ongoing work undertaken by Fujitsu in relation to the Inquiry, including discussions with current employees, Morrison Foerster was informed that employees who worked on the Fujitsu Helpdesk had access to an online knowledge base containing, amongst other things, call scripts and instructions on how to resolve common problems. This database was called HSH One (later renamed HSD One) and was to be used by Fujitsu Helpdesk operators to assist with the resolution of calls to the Fujitsu Helpdesk.
21. On 2 May 2023, Morrison Foerster provided me with a copy of an email from the Inquiry of the same date, timed 15:38. In this email, the Inquiry requested confirmation of whether HSH One had been searched for material relevant to the Rule 9 requests issued to date, including requests for copies of scripts used by the Fujitsu Helpdesk when dealing with calls from Post Office branches (the “**HSH One Request**”).
22. Fujitsu endeavoured to investigate the HSH One Request and update the Inquiry on its findings as promptly as possible. Fujitsu therefore made rolling disclosures to the Inquiry on 12, 19, and 26 May 2023, 2 June 2023 and 31 July 2023. In summary, these disclosures included the following:

- (a) Documents titled HSD KEL which I understand were intended to be used by Fujitsu Helpdesk staff in calls with end-users, which were disclosed to the Inquiry on 12 and 19 May 2023.
- (b) Documents containing guidance and/or recommended responses for queries faced by Helpdesk operators, which were disclosed to the Inquiry on 12 and 19 May 2023.
- (c) Guidance on the use of the HSH One and TfS databases, disclosed to the Inquiry on 12 and 19 May 2023.
- (d) Documents relating to the operational history of HSH One, which were disclosed to the Inquiry on 26 May 2023.
- (e) Following completion of Fujitsu's review of documents from relevant hard copy repositories, a "call answering script" and other written guidance notes understood to have been provided to Fujitsu Helpdesk staff were disclosed to the Inquiry on 2 June 2023.
- (f) Excel spreadsheets containing information regarding HSD KELs, including extracted text of certain HSD KELs, disclosed to the Inquiry on 31 July 2023.

Use of scripts by the Fujitsu Helpdesk

23. I am aware that the Inquiry may wish to make factual findings regarding the use of call scripts in due course, and I do not seek to pre-empt those findings in this statement. With this in mind, the starting point of Fujitsu's investigations was to reflect on the evidence produced to the Inquiry regarding the use of call scripts by the Fujitsu Helpdesk, particularly in relation to the cash account. For contextual purposes only, my understanding of this evidence is summarised below:

- (a) Cash account call scripts appear to have been in use by the Fujitsu Helpdesk from at least July 1999, according to a “Progress Summary for Input to Horizon/Pathway Delivery Meeting 21st July 1999” (Inquiry URN FUJ00119847). The process of introducing these scripts is set out in more detail in a PinICL raised in June 1999 in relation to “HSH/NBSC interface and responsibilities” (Inquiry Control Number POINQ0048693F). This PinICL states that, following two weeks of monitoring, the cash account scripts were deemed useful and work was undertaken to develop them such that they defined more clearly when calls should be referred to the NBSC. New versions of the scripts appear to have been produced by Fujitsu personnel and issued to Post Office for comment in August 1999.
- (b) The introduction of cash account scripts formed part of the rectification plan that was agreed between the Post Office and Fujitsu in response to Acceptance Incident 408. I refer to the “Resolution Plan for AI408 – Horizon System Helpdesk” (Inquiry Control Number POINQ0125806F) in this respect, which states that the updated cash account scripts came into operation in September 1999.
- (c) Upon receipt of a call from an end-user requiring support when completing the cash account or relating to issues being experienced with the cash account, it was intended that Fujitsu Helpdesk staff would lead the end-user through the cash account process using relevant call scripts. If this did not result in completion of the cash account or resolution of the issues being experienced, it was intended that the call would be transferred to the NBSC.

This process is set out in the “ICL Pathway/POCL Interface Agreement for the NBSC and HSH Interface” (Inquiry URN FUJ00080405). The relevant Service Level Targets for the Fujitsu Helpdesk were set out in the Second and Third Supplemental Agreements, respectively dated 24 September 1999 and 19 January 2000, and included that approved call scripts were to be followed by Fujitsu Helpdesk staff in at least 95% of calls.

- (d) As set out above, responsibility for dealing with calls relating to the cash account appears to have been transferred to the NBSC in or around late 2002.
24. As explained below, Fujitsu has sought to investigate fully what guidance and tools were provided to Fujitsu Helpdesk staff in order to identify scripts, particularly relating to the cash account. I have been closely involved in monitoring these investigations. In particular, Fujitsu’s investigations into HSH One comprised: (i) document searches in Relativity; (ii) hard copy document searches; (iii) the retrieval and review where possible of preserved, but previously inaccessible, data; and (iv) enquiries with current employees involved in the operation or decommissioning of HSH One, or its successor databases.
25. Notwithstanding these efforts, regrettably Fujitsu has been unable to identify copies of the cash account call scripts.

HSH One

26. Fujitsu’s investigations in relation to the HSH One Request and, in particular, our discussions with current employees who previously held roles relating to the Fujitsu Helpdesk, indicate that:

- (a) HSH One was a 'web-based local intranet tool' designed for and used by the Fujitsu Helpdesk from at least 2003 as a facility to search for information on known errors.
- (b) Fujitsu Helpdesk operators could search the database for relevant HSD KELs when dealing with calls from Post Office branches. To the extent there was an available HSD KEL dealing with the issue being raised on a call, the guidance it contained could be used by the Helpdesk operator to seek to resolve the call.
- (c) HSD KELs were periodically updated or, if the information contained within them was no longer relevant (for example, because the known error had been fixed by way of a new system release), removed from HSH One.
- (d) In or around 2009, HSH One was 'retired' and replaced by a new system called TfS which was in use until 2018. As mentioned above, TfS was used by Fujitsu to service various customers, in addition to the Post Office. Certain knowledge records (including HSD KELs) were migrated to TfS. An index of the knowledge records which were stored on HSH One at the point it was retired and migrated to TfS was produced to the Inquiry on 31 July 2023 (Inquiry Control Number POINQ0230372F).
- (e) From other documents that were recently disclosed by Fujitsu to the Inquiry, I understand that in September 2018, as part of the assistance provided by Fujitsu to the Post Office during the Group Litigation, Fujitsu sent certain TfS records to Womble Bond Dickinson, Post Office's legal representatives in the Group Litigation at the time (see, for example, Inquiry Control

Numbers POINQ0184040F, POINQ0184045F, POINQ0185537F, POINQ0185540F, POINQ0165890F).

- (f) TfS was retired in 2018 and replaced by ServiceNow, also a system used for multiple helpdesk customers of Fujitsu. As mentioned above, in the course of its investigations into HSH One, Fujitsu has identified a back-up of TfS containing the text data of the knowledge articles, some of which date back to 2008, which were stored on TfS at the time it was retired. This data has been extracted into a single excel document which was recently produced to the Inquiry on 31 July 2023 (Inquiry URN POINQ0230376F). The process by which this data was identified is set out in more detail in paragraphs 49 to 53 below. This snapshot of the TfS database does not appear to contain the cash account scripts referred to in paragraph 23 above.

Prior Rule 9 Requests

27. The Inquiry has requested details of the disclosure process undertaken by Fujitsu in respect of the following Rule 9 requests:
- (a) “Request No. 4”, which at Item 6 sought *“any guidance, training or instructions given to ICL / Fujitsu personnel between 1999 and the present in relation to the management and categorisation of incidents or problems identified in Horizon including (where applicable) the application of closure codes.”*; and
- (b) “Request No. 20”, which sought *“copies of relevant call scripts provided to members of”* Fujitsu support services between 1999 and 2014. To assist,

the Inquiry also provided a definition of the term “scripts” which was expansive in its scope.

28. Request No. 4, more generally, contained 11 separate items which covered a number of issues and events, including, but not limited to: (i) the development of Legacy Horizon and matters arising prior to the national roll-out; (ii) the IMPACT programme; (iii) privileged access rights; (iv) modifications to the Horizon IT System dating from 2005 to 2018; (v) the pilot and acceptance of Horizon Online; and (vi) assurance of the Horizon IT System across over 20 years of operation.
29. The Inquiry provided Fujitsu with a deadline of six weeks (from 18 February 2022 to 1 April 2022) to respond to all items in Request No. 4.
30. Fujitsu’s approach to Request No. 4 is set out at paragraphs 14 to 20 of the Second Disclosure Statement. In particular, I understand from Morrison Foerster that over 48,000 documents were reviewed for the purposes of responding to Request No. 4 and over 7,000 documents were produced to the Inquiry from this review.
31. The request contained in Item 6 of Request No. 4 was substantial. Documents relating to “*the management and categorization of incidents or problems*” could encompass the majority of documents available to or used by the different support lines provided by Fujitsu to the Post Office. Fujitsu sought to focus on identifying and disclosing documents relating to the incident and problem management processes described in Fujitsu’s contractual and operational documentation over the relevant period. In addition, relevant employees were approached to help Fujitsu identify any further documents or categories of documents that were likely to contain the information sought by the Inquiry.

32. In the event, Fujitsu produced approximately 700 documents in response to Request No. 4, Item 6 on 30 March 2022. These included: (i) formal process and procedure documents, manuals and handbooks which set out the management and categorization of incidents and problems; (ii) matrices applied in respect of calls received and incidents identified; and (iii) other documents relating to the Fujitsu Helpdesk.
33. While I have not personally reviewed all of the documents that were disclosed on 30 March 2022, I understand that they did not contain call scripts available to or used by the Fujitsu Helpdesk. This is because, at the time of responding to Request No. 4, I do not believe that Item 6 was understood by the legal team supporting the Inquiry on behalf of Fujitsu to relate specifically to call scripts. Moreover, I believe that our understanding of the Call Scripts Issue and its significance was not as developed at that time as it is now.

Request No. 20

34. Upon receipt of Request No. 20, Fujitsu applied the search terms set out at Appendix 1 to the documents contained on its Relativity instance. Fujitsu also contacted and spoke with 19 current employees who worked in various lines of support between 1999 and 2014 and were considered likely to be able to provide information relevant to the request.
35. On 9 February 2023, as a result of the processes set out above, Fujitsu produced approximately 16,000 documents in response to Request No. 20. I understand from Morrison Foerster that these documents included:

- (a) Approximately 50 (including family documents) call scripts and documents containing extracts of call scripts with written text for use by call handlers when receiving calls from postmasters or other end users.
- (b) Known Error Logs (“**KELs**”) used by Fujitsu’s second and third line support teams dated 1 January 2001 to 31 December 2023. Fujitsu previously produced KELs dated up to 31 December 2000 in response to the Inquiry’s third Rule 9 request.
- (c) Work instructions, knowledge articles and knowledge documents, which were identified as potentially relevant through Fujitsu’s investigations with its employees.
- (d) A limited number of contextual documents, providing background as to how ‘scripts’ (as defined in Request No.20) were used by the Fujitsu support lines, where they fell within the incident and problem management processes Fujitsu had in place at the time, and how they were stored or maintained.

HSH One Request

- 36. The Inquiry has also requested details of Fujitsu’s disclosure process in relation to the HSH One Request.
- 37. Following receipt of the HSH One Request, I directed Morrison Foerster and my team at Fujitsu to investigate as a priority whether Fujitsu still held a copy of the database.
- 38. As mentioned above, Fujitsu’s investigations into HSH One comprised: (i) document searches in Relativity; (ii) hard copy document searches; (iii) the

retrieval and review where possible of preserved, but previously inaccessible, data; and (iv) enquiries with current employees involved in the operation or decommissioning of HSH One, or its successor databases. The process followed by Fujitsu in respect of each of these workstreams and their findings are set out below.

Electronic Document Searches

39. Upon receipt of the HSH One Request, Fujitsu applied the search terms set out in Appendix 2 to this statement to the documents stored on Fujitsu's Relativity instance. These searches returned approximately 2,000 electronic documents which were reviewed for relevance by Morrison Foerster. Relevant documents identified through this review were produced to the Inquiry on 19 May 2023.

Hard Copy Document Review

40. Fujitsu has preserved various hard copy documents and physical media which have not been ingested into Relativity for the reasons given in the Second Disclosure Statement. Fujitsu investigated these preserved records as follows:

- (a) Fujitsu's Stevenage (09) office: Members of my team at Fujitsu reviewed hard copy documents which had been stored in Fujitsu's Stevenage (09) office as this is understood to have been the primary location from which helpdesk services were provided to the Post Office account during the relevant period. Hard copy documents were identified with the assistance of current Fujitsu employees who previously held roles in relation to the Fujitsu Helpdesk. This resulted in relevant documents being produced to the Inquiry on 12 May, 19 May and 2 June 2023.

(b) Archiving facilities:

- (i) Prior to receiving the HSH One Request, and in the context of its ongoing work in relation to the Inquiry, Fujitsu had undertaken an exercise to identify documents potentially relevant to Post Office or Horizon-related matters contained in its hard copy archiving facilities. These facilities are hosted by third party providers, Iron Mountain and 2Exel Logistics. Fujitsu obtained indices of the archives and applied broad search terms (including “Pathway”, “Horizon” and “Post Office”) in addition to consulting relevant Fujitsu personnel regarding where relevant documents may have been stored. As a result, approximately 160 boxes of potentially relevant documents were identified. These boxes have been reviewed, and any documents relating to the Inquiry’s Terms of Reference have been scanned and ingested to Fujitsu’s Relativity instance.
- (ii) Hard copy documents from the legacy offices used by the Fujitsu Helpdesk (namely, the Stevenage (09) and Manchester (05) offices) have been archived in Fujitsu’s Iron Mountain and 2Exel storage facilities since these offices closed. Following receipt of the HSH One Request, and in order to identify whether any documents relating to the Fujitsu Helpdesk remained in storage, Fujitsu applied the targeted search terms set out in Appendix 3 to the indices of the documents archived at these storage facilities. Based on the descriptions provided in the indices, these searches did not identify

any boxes which appeared to contain documents relating to the Fujitsu Helpdesk. Fujitsu also made enquiries of its Wakefield office, which was used by the Fujitsu Helpdesk for a short time. I understand that no records from the Wakefield office around the time it was used by the Fujitsu Helpdesk have been archived or otherwise identified.

- (iii) I understand from my team at Fujitsu that there are limitations to the utility of the indices. More specifically, the indices do not in all instances provide a comprehensive view of the contents of archived boxes. Further, as the storage facilities contain records relating to numerous Fujitsu customers in addition to the Post Office, I assumed that the incidence of irrelevant material would be high if these records were retrieved and manually reviewed box by box. I therefore directed my team to focus on other streams of investigation, on the basis that these were more likely to deliver relevant records in acceptable timescales to the Inquiry.

Database Searches

41. The data that has been preserved by Fujitsu for the purposes of the Inquiry includes 7,300 Access Databases. These databases have only recently and partially been ingested into Fujitsu's Relativity instance. Fujitsu has sought to recover, extract, process and search the Access Databases to ascertain whether they contain a copy of HSH One or the data that was historically stored on HSH One.

42. Shortly after receiving the HSH One Request, I consulted with technical specialists who have assisted Fujitsu's evidence collection process regarding the most efficient way of interrogating the Access Databases. I understood from these discussions that, in most cases, it is possible to extract tables from such databases which can then be searched using the Relativity platform. I therefore directed Fujitsu's technical specialists to extract these tables, and to then search the database indices for potentially relevant content descriptions.
43. At the time of preparing this statement for signature, I understand from the relevant Fujitsu technical specialists and from Morrison Foerster that:
- (a) a total of approximately 7,300 database files were identified.
 - (b) Of these, approximately 2,500 database files were identified as exact duplicates using the MD5 checksum methodology, and such duplicate databases were excluded from further processing.
 - (c) Of the remaining approximately 4,800 database files, approximately 3,600 have had their tables extracted into a format that can be searched in the Relativity platform. Approximately 73,000 tables have been extracted from these database files.
 - (d) Fujitsu applied the search terms set out in Appendix 4A to the file names of both the Access Databases and the extracted tables. Following a further review of the responsive descriptions, Fujitsu identified 1 relevant document, which was produced to the Inquiry on 31 July 2023.
 - (e) Fujitsu then applied the search terms set out in Appendix 4B to the extracted tables and identified approximately 1,600 files containing potentially

relevant data. Following further review of the tables, Fujitsu identified 3 relevant documents which were produced to the Inquiry on 31 July 2023.

44. Approximately 1,200 database files are yet to be processed such that their tables can be extracted. Some of these database files are password protected and Fujitsu's technical specialists have not, in the time available, been able to unlock the passwords (although Fujitsu continues to try to do so).
45. Fujitsu will keep the Inquiry updated on its progress in extracting and searching these tables and it will promptly disclose any documents which relate to the Call Scripts Issue.

Interviews with current employees

46. Following receipt of the HSH One Request, Fujitsu identified existing employees who held roles in relation to the Fujitsu Helpdesk during the relevant period. Interviews were conducted and documented with 11 current employees, including those who held the following roles in relation to the Post Office Account:
 - a. Fujitsu Helpdesk operators and Managers;
 - b. Service Delivery Managers;
 - c. Engineers; and
 - d. Other roles supporting the operation of the Fujitsu Helpdesk, such as application development and second line support.
47. As well as providing my team with information regarding what HSH One was, how it was used and the types of documents stored on it (as set out in paragraph 26 above), a small number of employees identified hard copy documents relating to their role on the Fujitsu Helpdesk. To the extent these documents were identified

as relevant, they were produced to the Inquiry on 12 and 19 May and on 2 June 2023.

48. The interviews indicated that only some of the employees who were interviewed recalled using scripts other than the HSD KELs and call answering scripts. Some recalled the use of diagrams and flowcharts (for example, Inquiry Control Number POINQ0158617F) and being provided with a hard copy folder containing guidance and training documents for dealing with calls.
49. It became apparent to me and the legal team conducting the interviews, document searches, and database investigations described above that it was unlikely that a copy of HSH One remained in existence. I therefore directed Morrison Foerster and my team at Fujitsu to expand the scope of our investigations to include searches for copies of the TfS database on the basis that this may contain copies of the knowledge articles that were migrated from HSH One to TfS in or around 2009, or other documents of interest to the Inquiry. In order to do this, Fujitsu spoke with 4 current employees who were involved in either the migration of HSH One to TfS, or the decommissioning of TfS in 2019.
50. As mentioned earlier in this statement, TfS was used for multiple Fujitsu customers and not solely the Post Office. The migration and decommissioning work on TfS was carried out by a central team within Fujitsu that was not specific to the Post Office Account.
51. From discussions with this central team, I understand that a back-up was taken of the data contained in TfS at the point it was decommissioned. A copy of the TfS back-up was held in storage by the relevant central team and a copy of certain

data for each individual tenant of the system was provided to the relevant client account team within Fujitsu. I understand that the TfS data retained by the Post Office Account team did not include knowledge articles. It only comprised Helpdesk call records from the Hera and Apollo systems. Indeed it was this data that was copied and collected by Fujitsu's legal team supporting this Inquiry in order that Helpdesk call records that were not already contained in Relativity could be interrogated for relevance to Rule 9 Requests.

52. Pursuant to the discussions referred to in paragraph 51 above, the central team has restored the TfS back-up it retained from the time of decommissioning and extracted the data relating to the Post Office Account (the "**TfS/POA back-up**"). This included recovery of the raw text data for approximately 560 knowledge articles that were stored on TfS at the time it was decommissioned. Fujitsu produced an export of this data on 31 July 2023 (Inquiry Control Number POINQ0230376F). Fujitsu is seeking to resolve how best to deduplicate the data contained in the TfS back-up and convert it into a reviewable format such that it is included in future searches conducted for the purposes of the Inquiry. Work is continuing in this respect, and Fujitsu will provide the Inquiry with an update in due course. In the meantime, to the extent any further data is identified as relevant to the HSH One Request or prior Rule 9 requests, Fujitsu will endeavour to disclose this data without delay.
53. As mentioned above, to the extent it would assist the Inquiry, Fujitsu can make the TfS/POA back-up available to the Inquiry for further review.

54. Whilst Fujitsu has been unable to locate a copy of HSH One, as a result of the investigations summarised above, a number of relevant documents have been identified and disclosed to the Inquiry. Fujitsu remains willing to explore further lines of investigation with the Inquiry. That said, from the thorough investigations carried out to date and in light of the significant amount of time that has passed since HSH One was in use and since the Fujitsu Helpdesk was responsible for calls relating to the cash account, it would appear that Fujitsu is unlikely to find further call scripts relating to the cash account or a copy of HSH One. To the extent new data comes to light, Fujitsu will continue to run searches for call scripts in accordance with its ongoing obligations to the Inquiry in relation to disclosure.

ITEM 2: ARQ DOCUMENTS

Background

55. As noted above, on 9 June 2023, Fujitsu disclosed the Presentation to the Inquiry. The Presentation is of significance to the Inquiry because it directly relates to the ARQ Issue. It raised concerns regarding the “*completeness*” of ARQ data. It identifies Peak PC0152376 and contains the following statement: “*The fact that EPOSS code is not resilient to errors is endemic*”. Consequently, it identified an “*immediate issue*” that the “*current standard witness statement [was]...incorrect*” and discussed additional steps when gathering audit data for prosecution support.
56. The Presentation was disclosed alongside certain documents responsive to Rule 9, Request 25 (“**Request No. 25**”). It was not itself considered by Fujitsu to be responsive to Request No. 25. Rather, as noted in Morrison Foerster’s letter to the Inquiry of 9 June 2023, it (amongst other documents) was disclosed because it

was “*relevant to related Phase 4 topics which Fujitsu considers may be of assistance to the Inquiry*”. Fujitsu recognised the significance of the Presentation and specifically drew it to the Inquiry’s attention in the 9 June 2023 letter. It also stated it was conducting further searches and enquiries in relation the matters raised by the Presentation, so as to provide the Inquiry with further relevant documents.

57. As a result, on 21 June 2023, Fujitsu disclosed the 21 June Related Documents.
58. As noted above, on 12 July 2023, the Inquiry wrote to Morrison Foerster requesting that an appropriate individual make a disclosure statement to explain why the Presentation and the Related Documents “*had not previously been disclosed to the Inquiry, including whether Fujitsu considers they should have been disclosed in response to one or more of the following requests (and if so, the reasons for late disclosure): Rule 9(2) of 26 November 2021, §5, Rule 9(4) of 18 February 2022, §11; and Rule 9(12) of 17 August 2022, §§68-71.*”
59. I deal with these matters below.

How the Presentation and Related Documents were identified for disclosure in June 2023

60. Around the end of May 2023, while preparing for certain aspects of Phase 5 of the Inquiry, an in-house solicitor within my team at Fujitsu identified a small number of documents which he considered might potentially be relevant to Fujitsu’s response to Request No. 25. On 30 May 2023, he shared those documents, as part of a larger list of approximately 700 other documents, with Morrison Foerster to be considered for disclosure (in addition to any documents that may have been

identified by the ongoing search and review processes Morrison Foerster were implementing for Request No. 25). A copy of the Presentation (Inquiry URN FUJ00155388), which was attached to an email dated 15 December 2008 (Inquiry URN FUJ00155387), was included in the larger list, but was not one of the documents that was specifically highlighted to Morrison Foerster as potentially relevant to Request No. 25.

61. In the following days, a member of Morrison Foerster's team working on Fujitsu's response to Request No. 25 reviewed the larger list of documents provided, and identified within them FUJ00155388. I understand that this document was recognised by the relevant individual as relevant to Phase 4 of the Inquiry. Further searches were conducted, and the Presentation, which was attached to a later email dated 17 December 2008, was also identified, along with the 9 June Related Documents.
62. On 8 June 2023, the Presentation was drawn to my attention by Morrison Foerster. To the best of my knowledge, this was the first time I had reviewed the Presentation.
63. On reviewing the Presentation, I concluded that it was plainly relevant to the Inquiry's terms of reference. The same day, I instructed Morrison Foerster that the Presentation, and any related documents already identified, should be disclosed as soon as possible. In addition, I instructed that enquiries should be conducted as a matter of urgency to ascertain more information about the context for the Presentation and the outcome of the decisions it identified as being necessary to undertake.

64. Morrison Foerster carried out targeted searches to identify copies of the Presentation and related documents. A copy of the search terms used for this exercise is at Appendix 5. In addition, I undertook my own investigations using searches of Fujitsu's Relativity database to gain a better understanding of the context around the Presentation and to flag any potentially relevant documents to Morrison Foerster for disclosure to the Inquiry.
65. As noted above, Fujitsu disclosed the Presentation to the Inquiry on 9 June 2023, and the Related Documents on either 9 June 2023 or 21 June 2023.

Relevance of the Presentation to prior Rule 9 Requests

66. In the Disclosure Statement Request, the Inquiry seeks an explanation as to why the Presentation and Related Documents were not disclosed in response to prior Rule 9 Requests.
67. The Inquiry has referred to the following Rule 9 Requests in particular:
- (a) "Request No. 2", which at Item 5 sought "*copies of any reviews or investigations (produced by Fujitsu or by an external firm on Fujitsu's behalf) which address the accuracy of the evidence that was provided by Mr Gareth Jenkins, Ms Anne Chambers or any other Fujitsu employee relating to the efficacy of the Horizon system in criminal or civil proceedings*".
 - (b) Request No. 4, which at Item 5 sought "*any documents or records you hold (whether circulated internally by Fujitsu or provided to a third party such as POL) relating to the rectification of the bugs, errors or defects identified at 4a.-f. above*". The specific bugs referred to in Item 4a – f of Request No. 4 were (a) Receipt and Payments Mis-Match Bug, (b) Callendar Square Bug,

- (c) Suspense Account Bug, (d) Dalmellington Bug, (e) Data Tree Build Failure discrepancies, and (f) Phantom Transactions (in each case, as defined in Judgment (No.6) “Horizon Issues” [2019] EWHC 3408 (QB) (the “**Horizon Issues Judgment**”)).
- (c) “Request No. 12”, which sought witness statements from appropriate person(s) covering a broad range of matters across 71 Items, including ²:
- (i) **Item 69**: When Fujitsu became aware of “*the problems identified by*” and “*the actual existence of*” the bugs identified in the Horizon Issues Judgment, and who within Fujitsu first became aware of these matters;
 - (ii) **Item 70**: Details regarding the nature and extent of the bugs identified in the Horizon Issues Judgment, Fujitsu’s knowledge of those bugs, whether Fujitsu informed POL of this and what steps Fujitsu took to investigate and rectify such bugs;
 - (iii) **Item 71**: Whether Fujitsu considers that any other “*bugs or sources of error in the Horizon IT System*” could have “*caused discrepancies and / or shortfalls in branch accounts or (b) affected the reliability of the Horizon IT System accurately to process and record transactions*”.

² In its request for this Disclosure Statement, the Inquiry also refers to Item 68 of Request No. 12. However, Item 68 contains no substantive request for information. Rather it simply refers Fujitsu to the case of *Bates & Ors v Post Office Limited: Judgment (No. 6) “Horizon Issues”* [2019] EWHC 3408, in particular Appendices 1 and 2.

Request No. 2

68. Request No. 2, Item 5 referred to “*reviews or investigations*” which addressed the “*accuracy of the evidence*” that was given in civil and criminal proceedings by Mr Gareth Jenkins, Mrs Anne Chambers or any other Fujitsu employee.
69. In preparing its response to Request No. 2, Fujitsu and Morrison Foerster identified several pools of documents for potential disclosure. These included (i) internal and external legal advice concerning aspects of Fujitsu’s prosecution support service, (ii) documents related to Fujitsu’s engagement with Second Sight Support Services Limited, and (iii) internal Fujitsu working papers/correspondence concerning problems with the Horizon system.
70. As part of this process, documents relevant to the ARQ Issue were considered for disclosure. Fujitsu’s external legal advisors concluded, however, that documents relating to the ARQ Issue were not responsive to Request No. 2, Item 5. This conclusion was reached because, while these documents raised problems with aspects of the Horizon system and resultant concerns regarding the evidence that had been given by Fujitsu employees in court proceedings, the view was taken at the time that none of the documents appeared to be a formal review or investigation into the accuracy of the specific evidence that had been given by Mr Jenkins, Mrs Chambers or any other Fujitsu employee in civil or criminal proceedings. Accordingly, Fujitsu did not disclose documents relating to this issue, including the Presentation, to the Inquiry at the time. Fujitsu accepts this was too narrow a reading of the Inquiry’s request, and apologises for that oversight. As

explained in greater detail below, Fujitsu now takes a broader and more proactive approach to the Inquiry's requests.

71. The assessment of relevance when responding to a Rule 9 Request involves the exercise of judgment. As explained in the First Disclosure Statement, this judgment involves balancing the risk of providing too few or too many documents. Fujitsu's and its advisors' understanding of the approach that should be taken to Rule 9 Requests has changed. We got the balance wrong on the occasion of Request No. 2, Item 5. I believe we would, today, take a different approach to that request. In particular, Fujitsu engages with the Inquiry to clarify the scope of its requests (where necessary) and also takes a broad view of relevance, taking into account the Inquiry's terms of reference in addition to the strict terms of any Rule 9 request.

Request No. 4

72. Request No. 4, Item 5 sought any documents or records that related to the rectification of 6 specific bugs, errors or defects ("**BEDs**") identified by Mr Justice Fraser in the Horizon Issues judgment. Those 6 BEDs are listed at paragraph 67(b) above.
73. I repeat paragraphs 28 to 30 above, in relation to the context in which Fujitsu was responding to Request No. 4, Item 5. Fujitsu responded to Items 4 and 5 of Request No. 4 together, producing approximately 5,900 documents (including family documents) in response.
74. Fujitsu does not consider that the Presentation or any of the Related Documents were, by virtue of their relevance to the ARQ Issue, responsive to Request No. 4, Item 5.

75. In Fujitsu's view, none of the six BEDs identified in Request No. 4, Item 5 encompassed the ARQ Issue. In this regard, I note that neither the Presentation nor any of the Related Documents were responsive to the search terms used to identify the review pool for Request No. 4, and consequently were not reviewed for disclosure at that time.

Request No. 12

76. Request No.12 was a request for a "Corporate Statement" made by a sufficiently senior person within Fujitsu. It was made on 17 August 2022. Request No. 12 contained 71 individual requests, covering topics including, but not limited to: (i) the procurement, design, development and pilot of the Legacy Horizon system; (ii) the acceptance and testing of the Legacy Horizon system; (iii) consultation with end users of the Horizon system; (iv) modifications to the Horizon system, including the IMPACT programme and aspects of Horizon Online; (v) the nature and scope of support services available for Horizon; (vi) the training that was provided to individuals who operated Horizon, provided Horizon support or audited the Horizon system; (vii) the Management Care Visit Programme; and (viii) Fujitsu's knowledge and rectification of BEDs.
77. Fujitsu responded to the Request in two Corporate Statements. It addressed Items 69 to 71 of Request No. 12 in its Second Corporate Statement. While the Second Corporate Statement is dated 29 December 2022, in accordance with the Inquiry's Protocol on Witness Statements, Fujitsu submitted it in draft form on 14 October 2022.

78. In relation to Items 69 and 70, Fujitsu's Second Corporate Statement focused on Fujitsu's awareness and rectification of the 29 BEDs listed in Item 69. The issue referred to in the Presentation and the Related Documents are not encompassed by the 29 BEDs.
79. Fujitsu acknowledges that the Presentation and the Related Documents are responsive to Item 71.
80. Given the breadth of Item 71 and the time limits in which Fujitsu had to respond to the Inquiry, Fujitsu considered that the Inquiry would be assisted by having complete access to all available Peaks, PinICLs and KELs for the period 1 January 2001 onwards. The documents held on these systems would have captured problems, bugs or errors of the nature described in Item 71. Fujitsu considered this was a reasonable approach to take as it had, after consulting members of the Inquiry's legal team, disclosed on 28 January 2022 all PinICLs up to and including 31 December 2000 in response to Rule 9, Request No. 3. Accordingly, at paragraph 198 of the Second Corporate Statement, Fujitsu offered disclosure of records contained within the PinICL, Peak and KEL databases for the period 1 January 2001 onwards.

Delay in providing the Presentation and Related Documents to the Inquiry

81. As noted above, Fujitsu now accepts the Presentation and Related Documents should have been provided to the Inquiry earlier than June 2023. On behalf of Fujitsu, I apologise to the Inquiry for this oversight.
82. To prevent such delays in future, Fujitsu has improved the steps it takes when preparing its responses to Rule 9 Requests. In particular, it now considers for

disclosure when responding to Rule 9 requests documents that are recorded in various internal notes which have been prepared by the legal team supporting Fujitsu's participation in this Inquiry. If such documents are assessed to be relevant to the Inquiry's terms of reference, they have been disclosed irrespective of the Inquiry phase the documents may relate to. Indeed, this is how the Presentation came to be disclosed to the Inquiry alongside Fujitsu's response to Request No. 25.

Conclusion

83. Fujitsu is committed to assisting the Inquiry to fulfil its terms of reference. This includes approaching Rule 9 Requests in a way that best serves the Inquiry. I regret that the Presentation and Related Documents were not produced earlier and I apologise on behalf of Fujitsu for any disruption this has caused to the Inquiry's work.

Statement of Truth

I believe the content of this statement to be true.

Signed: **GRO**

Dated: 25 October 2023

APPENDIX 1

Search Terms applied in relation to Request No. 20

Date Range: 1 January 1999 to 31 December 2014

Document type: Excluding excel spreadsheets

Custodians: Excluding certain custodians which were unlikely to hold relevant documents.

Search Terms:

- Across filename only:
 - HSD Script
 - HSH Script
 - Helpdesk Script
 - Help Desk Script
 - Knowledge Article
 - Knowledge Base
 - "Work Instruction" OR "Work Instructions"
 - "KA" OR "KB"
 - "WKI" in the Dimensions custodian only

- Across all fields:
 - "knowledge base" OR "knowledge article"
 - "knowledge base article" OR "knowledgebase article"
 - "KB Article"
 - "work instruction!"
 - "HSD1" OR "HSDOne"
 - "Message Broadcast"
 - "Operational Focus"
 - "Operational Focus Magazine"
 - "Counter Help Service"
 - "Counter News"
 - HSD w/5 Manual
 - HSH w/5 Manual
 - "Help Desk" w/5 Manual
 - Helpdesk w/5 Manual
 - HSD w/5 Script
 - HSH w/5 Script
 - "Help Desk" w/5 Script
 - Helpdesk w/5 Script
 - HSD w/5 "Work Instruction!"
 - HSH w/5 "Work Instruction!"

- “Help Desk” w/5 “Work Instruction!”
- Helpdesk w/5 “Work Instruction!”
- SMC w/5 “Work Instruction!”
- “Service Management Centre” w/5 “Work Instruction!”
- Atos w/3 Handover
- Atos w/3 “Hand Over”
- "reference training kit" OR "reference and training kit"
- "call handling" AND "script"
- (“closure code!” OR “error code!”) AND “script”
- "cash account script"
- "marooned transaction!" AND ("manual" OR "guide")
- "Adecco" AND ("script" OR "guidance")
- “SOP” OR “Standard Operating Procedures”
- "case base" OR "casebase"
- "Martin Provoost" AND ("script" OR "manual" OR "guid!" OR "instruction!" OR "call answering")
- "Noel Butcher" AND ("script" OR "manual" OR "guid!" OR "instruction!" OR "call answering")
- "Phillippa Whittington" AND ("script" OR "manual" OR "guid!" OR "instruction!" OR "call answering")
- "Peter Boyd" AND ("script" OR "manual" OR "guid!" OR "instruction!" OR "call answering")
- "Jules Collett" AND ("script" OR "manual" OR "guid!" OR "instruction!" OR "call answering")
- "Answering Process"
- "Simple PowerHelp Guide"
- "CL/ISD/PW/GUI/HSH/001"
- ("HSH" OR "HSD" OR "Helpdesk" OR "helpdesk") AND "Call routing table"
- "ICL/ISD/PW/PRO/HSH/002"
- ("HSH" OR "HSD" OR "Helpdesk" OR "helpdesk") AND "Call coding matrix"
- "ICL/ISD/PW/SPE/HSH/001"
- ("HSH" OR "HSD" OR "Helpdesk" OR "helpdesk") AND "technical work instructions"
- "ICL/ISD/PW/TWI/HSH/001"
- "ICL/ISD/PW/PRO/HSH/008"
- ("HSH" OR "HSD" OR "Helpdesk" OR "helpdesk") AND "library"
- Honey
- “Honey User Guide”
- “script” AND (“helpdesk” OR “help desk”)
- “script” AND (“helpdesk” OR “help desk”) AND “Honey”
- “script” AND (“helpdesk” OR “help desk”) AND “cash account”
- “script compliance”
- "Triole Commander"
- “HSD New starter”
- “Caller Greeting Script”

- deskwork
 - "triole action boxes"
 - "sending a call to"
 - "TFS Knowledge Base"
 - "Knowledge Base Information"
 - "Knowledge Base Action"
 - "Knowledge Base Fault"
 - "message broadcast service" AND "MBS*** has been sent to" (where * are numbers)
 - "HSD KEL"
 - "HSH KEL"
 - "helpdesk KEL"
 - "help desk KEL"
 - "HSD KEL" AND "symptom"
 - "HSH KEL" AND "symptom"
 - "helpdesk KEL" AND "symptom"
 - "help desk KEL" AND "symptom"
- Across all fields in Powerhelp custodian only:
 - "WKI"
 - SMC-WKI"
 - "knowledge base"
 - "case base" OR "casebase"
- Across email document type only:
 - "knowledge document"
 - "knowledge document" AND "DOC ID:"

APPENDIX 2

Search Terms applied in searches of electronic documents in relation to HSH One Request

Date Range: 1 January 1999 to 31 December 2014

Document Type: Word and PDF documents only

Custodians: All excluding shared drives and folders not likely to contain any relevant documents

Search Terms:

- (HSDOne OR “HSD ONE” OR HSD1 OR HSHOne OR “HSH One”) **AND** Instruction* OR
 - Manual OR
 - Guidelines OR
 - Guidance OR
 - (Script AND NOT “test script”) OR
 - Handbook OR
 - “Knowledge Article” OR
 - Knowledgebase OR
 - KEL

- (“Triole for Service” OR “Triole for Services” OR TfS) **W/5** o Instruction* OR
 - Manual OR
 - Guidelines OR
 - Guidance OR
 - (Script AND NOT “test script”) OR
 - Handbook OR
 - “Knowledge Article” OR
 - Knowledgebase OR
 - KEL

APPENDIX 3

Search Terms applied to indices of archiving facilities

- “HSH”
- “HSD”
- “Helpdesk”
- “Honey”
- “STE*”

APPENDIX 4A

Search Terms applied in relation to access databases

- “*HSH*”
- “*HSD*”
- “*Help*”
- “*Knowl*”
- “*Script*”
- “*Honey*”
- “*KEL*”

APPENDIX 4B

Search Terms applied in relation to access databases

- “HSD1”
- “HSDOne”
- “HSD One”
- “HSH1”
- “HSHOne”
- “HSH One”
- “Honey”
- “KEL ”
- “knowledge article”

Unique identifiers for HSD KELs listed in index to HSH One at time of migration to TfS (see paragraph 10 of the Third Disclosure Statement)

Brett2114Q	KBhachu4517R	PCorrick419S	SHill1252J
Brett242k	KBhachu4814R	PCorrick4459N	SHill1437K
CWalker1726R	KBhachu537M	PCorrick4712I	SHill1444L
Cwalker239Q	KBhachu5444S	PCorrick48W	SHill182Q
Cwalker244Q	KBhachu5456S	PCorrick5321S	SHill2352J
Cwalker3231K	KBhachu929R	PDambra1462N	SHill240I
DDawe2811L	KJohnson1711N	PDambra149S	SHill24K
DDawe3637I	KMacdonald3519P	PDambra2217Q	SHill2517J
DDawe5859M	KMaher302L	PDambra2639K	SHill2553L
DGriffiths2111I	KSchlatter624J	PDambra3926Q	SHill2612I
DGriffiths50T	LAmbrose5718Q	PDambra4127P	SHill2637I

DHall2016M	LCarr1212Q	PDambra43Q	SHill2819I
DMartin1547P	LCarr388M	PDambra5149P	SHill2915J
DMartin2012P	LCarr4123Q	Phil-KelTeam4054P	SHill3113I
DMartin232S	LCorfield4413R	PJohnson2931L	SHill3124L
DMartin243Q	MBishop126M	PJohnson3554Q	SHill3220J
DMartin2912L	Mbishop2648J	PJohnson4426L	SHill322K
DMartin3429M	MBishop286K	Rainbowm28P	SHill335I
DMartin3639R	MBrown1839K	Rainbowm3230S	SHill3550N
DMartin455J	MBrown1921L	RConstantini231M	SHill4239L
DMartin461S	MBrown4845P	RHartle320Q	SHill423N
DMartin4711M	MBrown5110I	Sandra457T	SHill4253Q
DMartin4742Q	MBrown841L	SArmstrong2223K	SHill4255P
DMartin4742R	MGates3616L	SArmstrong36N	SHill4358J
DMartin5536P	MMills5819M	SArmstrong41P	SHill444J
DMartin5758M	MPeach5652J	SArmstrong5047M	SHill4559J
DMartin840S	MSaunders1546L	SArmstrong92K	SHill457R
DMartin859P	MSaunders3257L	SBygrave2256R	SHill4853I
DMoulds2730W	MSaunders4838L	SBygrave4830U	SHill504M
DMoulds3243L	MTaylor232M	SCooper110R	SHill5333I
EJohnstone5345R	NMistry4417L	SCooper212P	SHill5358K
Farrell1836R	NMistry473K	SCooper2620Q	SHill5418H
JMould155J	NScott010L	SCooper3115M	SHill5614J
JMould1643J	NScott1724M	SCooper332K	SHill5633M
JMould1813J	NScott2037M	SCooper3524N	SHill583Q

JMould1929J	NScott2159J	SCooper3557Q	SHill5920L
JMould2058J	NScott2943L	SCooper3657J	SHill718M
JMould2334J	NScott3048J	SCooper3726R	SHill818R
JMould3420S	NScott3923L	SCooper3847P	SHill911K
JMould3953L	NScott43K	SCooper4039L	SLewis1157K
JMould403L	NScott4558K	SCooper4211N	SLewis5754Q
JMould941J	NScott4639Q	SCooper426Q	SThind4837I
KBhachu1130P	NScott500L	SCooper4441M	SWilliams5915N
KBhachu1417U	NScott5130K	SCooper4812K	Tfield3421s.htm755Q
KBhachu167R	NScott5221P	SCooper5120N	WBateman3957K
KBhachu220R	NScott526M	SCooper5158P	WBateman5111K
KBhachu2522S	NScott5343K	SCooper5219Q	WJones1148Q
KBhachu2619R	NScott5827L	SCooper5542P	WJones2018O
KBhachu3210K	NScott633J	SCooper5546R	WJones2915K
KBhachu3347M	NScott945P	SCooper556Q	WJones5120Q
KBhachu346R	NScottandKSchlatter2352Q	SCooper5845J	Zlappin2344L
KBhachu381R	NShortland461P	SDavies3610J	Zlappin298L
KBhachu3850N	NShortland814R	SHill019J	ZLappin5815N
KBhachu4152R	NShortland86K	SHill043K	Zlappin99L
KBhachu450M	PCorrick1953L	SHill047L	

APPENDIX 5

Search Terms applied in relation to ARQ Issue

Search Set 1

- Search terms
 - “BIMS Incident Report” OR “BE/**”
 - AND
 - PC0152376 OR PC0155120 OR PC0152421 OR PC0140715 OR PC0164429 OR PC0165710 OR PC0158102 OR DSED5628Q OR 152376 OR 155120 OR 152421 OR 140715 OR 164429 OR 165710 OR 158102
- Date range
 - 01/10/2007 to 31/12/2009

Search Set 2

- Search terms
 - PC0152376 OR PC0155120 OR PC0152421 OR PC0140715 OR PC0164429 OR PC0165710 OR PC0158102 OR DSED5628Q OR 152376 OR 155120 OR 152421 OR 140715 OR 164429 OR 165710 OR 158102 OR “CP0336” OR “CP No. 0336” OR “CP 0336” OR “CP4867” OR “CP No. 4867” OR “CP 4867”
 - AND
 - (penny w/2 thomas) OR (gareth w/2 jenkins) OR (gerald w/2 barnes) OR (graham w/2 allen) OR (alan w/2 holmes) OR (steven w/2 meek) OR (pete w/2 sewell) OR (wendy w/2 warham) OR ((steve OR steven) w/2 denham)
- Date range
 - 01/10/2007 to 31/12/2009

Search Set 3

- Search terms
 - “Prosecution support” OR “Litigation support” OR “ARQ*” OR “witness statement**”
 - AND
 - (gerald w/2 barnes) OR (graham w/2 allen) OR (wendy w/2 warham) OR ((steve OR steven) w/2 denham) OR (gareth w/2 jenkins) OR (penny w/2 thomas)
- File type
 - Emails only
- Date range
 - 01/10/2007 to 31/12/2009

Search Set 4

- Search terms
 - (“witness statement**” OR “ARQ*” OR “audit record quer*” OR “audit retrieval quer**”)
 - AND
 - (denham OR warham OR jukes)
- File type
 - Emails only
- Date range
 - 01/10/2007 to 31/12/2009

Search Set 5

- Search terms
 - “CP0336” OR “CP No. 0336” OR “CP 0336” OR “CP4867” OR “CP No. 4867” OR “CP 4867”
- Date range
 - 01/10/2007 to 31/12/2009

Search Set 6

- Search terms
 - PC0152376 OR PC0155120 OR PC0152421 OR PC0140715 OR PC0164429 OR PC0165710 OR DSED5628Q OR 152376 OR 155120 OR 152421 OR 140715 OR 164429 OR 165710
- File type
 - Emails only

Search Set 7

- Search terms
 - “prosecution support urgent issue”