1		Tuesday, 17 January 2023	1		best of your knowledge and belief?
2	(10	.00 am)	2	A.	Yes.
3	MR	BEER: Good morning, sir. Can you see and hear me?	3	Q.	Thank you very much. A copy of your witness statement
4	SIR	R WYN WILLIAMS: Yes, I can thank you very much.	4		will be uploaded to the Inquiry's website and thereby
5	MR	BEER: May I call Sandra McBride, please.	5		publicly available. So I'm not going to ask you
6	SIR	R WYN WILLIAMS: Yes.	6		questions about every part of it. Do you understand?
7		SANDRA LOUISE McBRIDE(affirmed)	7	A.	Okay, sure.
8		Questioned by MR BEER	8	Q.	Can we start, please, with your background and
9	Q.	Thank you very much. As you know, Mrs McBride, my name	9		experience. I think you joined the Post Office in 1986;
10		is Jason Beer and I ask questions on behalf of the	10		is that right?
11		Inquiry. Can you tell us your full name, please.	11	A.	Yes.
12	A.	Sandra Louise McBride.	12	Q.	And you left in 2016?
13	Q.	Thank you very much. Thank you very much for coming to	13	A.	That's right.
14		give evidence to the Inquiry today and for previously	14	Q.	So had a 30-year career in the Post Office; is that
15		providing us with a witness statement. We're very	15		right?
16		grateful to you for the assistance that you have	16	A.	Yes.
17		provided to our investigation. Can we start with your	17	Q.	I think you started as a counter clerk; is that right?
18		witness statement, please.	18	A.	Yes.
19	A.	Sure.	19	Q.	Then in 1993 you moved to the training team as
20	Q.	If you can open up the folder in front of you, you	20		a subpostmaster trainer; is that right?
21		should find a witness statement in your name dated	21	A.	That's right, yes.
22		12 December 2022, 15 pages in length, and at the end of	22	Q.	And was that training provided in branch to
23		it should be a signature. Is that your signature?	23		subpostmasters rather than classroom training?
24	A.	Yes, it is.	24	A.	It was, yes.
25	Q.	Are the contents of that witness statement true to the	25	Q.	And that wasn't about the Horizon System because at that
		1			2
1		time it didn't exist and hadn't been rolled out; is that	1	Q.	And so the Crown offices, I think you say in your
2		right?	2		statement, were during the day?
3	A.	Yes.	3	A.	That's right, yes.
4	Q.	At that stage, were you trained to be a trainer before	4	Q.	The SPMs were in the evenings?
5		you became a trainer, or did you just get appointed as	5	A.	That's right, yes.
6		a trainer because of the experience you'd had as	6	Q.	Although you were using computers in order to train and
7		a counter clerk?	7		to, I think, administer the quiz is that right?
8	A.	Yes, it was because of my experience really as a counter	8	A.	Yes.
9		clerk, and I did do a small amount of training in the	9	Q.	that wasn't training on Horizon because, similarly,
10		local area. I think, in the same year, '93, there was	10		at that stage Horizon hadn't been rolled out?
11		a change to Royal Mail services, and I trained some	11	A.	That's right, yes.
12		subpostmasters on the new services, the new system.	12	Q.	That role was, I think, eventually dissolved, and you
13	Q.	In 1997 you moved to become what you describe in your	13		went into the classroom to deliver new entrant training;
14		statement as a CM2 manager. What's a CM2 manager?	14		is that right?
15	A.	Counter Manager level 2, I think it stood for.	15	A.	That's right, yes.
16	Q.	And your statement also describes yourself as	16	Q.	I think, when you delivered that classroom training
17		a Transactional Knowledge Manager. What was	17		is that right you did use Horizon?
18		Transactional Knowledge Manager?	18	A.	I'm not 100 per cent sure, to be honest, whether
19	A.	Right. So there was a few of us around the country and	19		because I can't remember exactly when it went into the
20		our role was to take deliver sessions for	20		classrooms, but initially in '97 it would have just been
21		subpostmasters, mostly in the evenings, and we had	21		the manual classroom training.
22		a load of laptop computers which we took with us, and	22	Q.	Yes. If you just look at your statement
23		the subpostmasters completed a transactional knowledge	23	A.	Yes.
24		quiz on these computers. So that was we did that	24	Q.	please, and look at the second page and the paragraph
25		also at Crown offices as well but mostly subpostmasters.	25		number 2, you say:
		3			4

1		"As far as I recall, I used a training Horizon	1		you can't remember how far back before May 2000 that
2		System (not live) during occasionally classroom training	2		was?
3		I delivered prior to my maternity leave in May 2000."	3	A.	No.
4		I think that's the period we're talking about. Is	4	Q.	Before you delivered training on Horizon, using Horizon,
5		that right there?	5		were you yourself trained in Horizon?
6	A.	Without knowing exactly the dates when the Horizon was	6	A.	I remember having the two days' training that everybody
7		put into the CTOs, I can't recall whether that was with	7		got. You know, I think managers got two days and clerks
8		Horizon or without, to be honest.	8		got one day, if I remember rightly.
9	Q.	You are referring to CTOs there. Can you explain what a	9	Q.	You say that, I think, in paragraph 6 of your witness
10		CTO is.	10		statement, if we go over the page. You say:
11	Α.	It stands for Counter Training Office. It's where the	11		"I've been asked how much experience I had using
12		classroom-based training took place.	12		the Horizon IT System prior to training others on how to
13	Q.	Where was that for you?	13		use it. As far as I recall, I received the standard 2
14		For me that could have been lots of different places.	14		days Horizon training which I believe was delivered by
15	Q.	· · · · · · · · · · · · · · · · · · ·	15		the external trainers."
16		So I was based in Colchester. We did have CTO at	16		Is that right?
17		Colchester at one point but I think that was quite early	17	Α.	That's right.
18		days. But I would work in Bury St Edmonds, Ilford,	18		So you got the same training as everyone else, no
19		wherever I was asked to go really.	19	Ψ.	special training because you were going to be a trainer?
20	O	So in the East Anglia area moving into East London; is	20	Δ	Not that I not that I recall. I remember having the
21	α.	that right?	21	,	two days, but to deliver the classroom training I must
22	Δ	Yes, yes.	22		have had some kind of training on the system that was in
23		So that's right, is it, that first part of the sentence	23		the classroom because that was slightly different.
24	α.	in paragraph 2: before you went on maternity leave, you	24	0	Slightly different to?
25		did use a Horizon training system in the classroom, but	25	Α.	To the live environment.
		5			6
1	Q.	Can you remember the differences between it and the live	1	Α.	So where and also, where there was a third party
1 2	Q.	Can you remember the differences between it and the live environment?	1 2	A.	So where and also, where there was a third party involved as in, if the system had to retrieve data from
				Α.	· · ·
2		environment?	2	A.	involved as in, if the system had to retrieve data from
2		environment? I remember initially we weren't initially with	2	A.	involved as in, if the system had to retrieve data from elsewhere, like DVLA, then we didn't have that facility
2 3 4		environment? I remember initially we weren't initially with Horizon we had stand-alone units in the classroom. So,	2 3 4	A.	involved as in, if the system had to retrieve data from elsewhere, like DVLA, then we didn't have that facility in the classroom. So we had to have what's called an
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1	Α.	Not specifically, no.
2	Q.	Was it ever discussed whether it might be an idea?
3		I think you continued to work with Horizon for 16 years
4		essentially from when you returned from maternity leave
5		I think in November 2000 until you left the organisation
6		in 2016, that refresher training might be a good idea?
7	Α.	Yes, yes, it would have I think we were really, as
8		trainers, required to keep themselves up-to-date with
9 10	^	the system.
11	Q.	How would you keep yourself up-to-date with the system? The same as anybody in the live environment, really.
12	Α.	You'd be notified of changes and any updates that were
13		made through the normal communication channels of
14		updating everybody. I can't remember exactly what they
15		were at the moment.
16	Q.	But, so far as you remember, no dedicated refresher
17	Q.	training?
18	Α.	Not that I can recall, no.
19	Q.	•
20	Q.	already mentioned, at this time you were using
21		a training version of Horizon and not the operating
22		version that was used in the live estate; is that right?
23	A.	That's right, yes.
24	Q.	I think you undertook that role until May 2000. As
25		I said already, you returned from maternity leave in
		9
		· ·
		Ü
1		•
1 2		a group make sure that the changes were made to all the materials in the course.
-	Q.	a group make sure that the changes were made to all the
2	Q.	a group make sure that the changes were made to all the materials in the course.
2	Q. A .	a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to
2 3 4		a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials?
2 3 4 5		a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of them all and yes, so I just made sure that those
2 3 4 5 6		a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of
2 3 4 5 6 7		a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of them all and yes, so I just made sure that those changes were made. Some of the changes I made myself,
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2 3 4 5 6 7 8 9		a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of them all and yes, so I just made sure that those changes were made. Some of the changes I made myself, once somebody had identified what needed to be done. So a lot of those changes I did do after agreeing with the team, the working group that I worked with, what changes
2 3 4 5 6 7 8 9 10	A.	a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of them all and yes, so I just made sure that those changes were made. Some of the changes I made myself, once somebody had identified what needed to be done. So a lot of those changes I did do after agreeing with the team, the working group that I worked with, what changes were needed.
2 3 4 5 6 7 8 9 10 11	A.	a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of them all and yes, so I just made sure that those changes were made. Some of the changes I made myself, once somebody had identified what needed to be done. So a lot of those changes I did do after agreeing with the team, the working group that I worked with, what changes were needed. Just to be clear as to the extent or limitations of your
2 3 4 5 6 7 8 9 10 11 12 13	A.	a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of them all and yes, so I just made sure that those changes were made. Some of the changes I made myself, once somebody had identified what needed to be done. So a lot of those changes I did do after agreeing with the team, the working group that I worked with, what changes were needed. Just to be clear as to the extent or limitations of your role, you weren't involved in the initial rollout of the
2 3 4 5 6 7 8 9 10 11 12 13 14	A.	a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of them all and yes, so I just made sure that those changes were made. Some of the changes I made myself, once somebody had identified what needed to be done. So a lot of those changes I did do after agreeing with the team, the working group that I worked with, what changes were needed. Just to be clear as to the extent or limitations of your role, you weren't involved in the initial rollout of the Horizon training programme, i.e. existing subpostmasters
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A.	a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of them all and yes, so I just made sure that those changes were made. Some of the changes I made myself, once somebody had identified what needed to be done. So a lot of those changes I did do after agreeing with the team, the working group that I worked with, what changes were needed. Just to be clear as to the extent or limitations of your role, you weren't involved in the initial rollout of the Horizon training programme, i.e. existing subpostmasters and counter staff, their training on the new Horizon
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A .	a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of them all and yes, so I just made sure that those changes were made. Some of the changes I made myself, once somebody had identified what needed to be done. So a lot of those changes I did do after agreeing with the team, the working group that I worked with, what changes were needed. Just to be clear as to the extent or limitations of your role, you weren't involved in the initial rollout of the Horizon training programme, i.e. existing subpostmasters and counter staff, their training on the new Horizon System?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Q.	a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of them all and yes, so I just made sure that those changes were made. Some of the changes I made myself, once somebody had identified what needed to be done. So a lot of those changes I did do after agreeing with the team, the working group that I worked with, what changes were needed. Just to be clear as to the extent or limitations of your role, you weren't involved in the initial rollout of the Horizon training programme, i.e. existing subpostmasters and counter staff, their training on the new Horizon System? No.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Q.	a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of them all and yes, so I just made sure that those changes were made. Some of the changes I made myself, once somebody had identified what needed to be done. So a lot of those changes I did do after agreeing with the team, the working group that I worked with, what changes were needed. Just to be clear as to the extent or limitations of your role, you weren't involved in the initial rollout of the Horizon training programme, i.e. existing subpostmasters and counter staff, their training on the new Horizon System? No. That was down to, I think, the company responsible for
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A . Q. A . Q.	a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of them all and yes, so I just made sure that those changes were made. Some of the changes I made myself, once somebody had identified what needed to be done. So a lot of those changes I did do after agreeing with the team, the working group that I worked with, what changes were needed. Just to be clear as to the extent or limitations of your role, you weren't involved in the initial rollout of the Horizon training programme, i.e. existing subpostmasters and counter staff, their training on the new Horizon System? No. That was down to, I think, the company responsible for the design and build and rollout of the system?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Q. A. Q.	a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of them all and yes, so I just made sure that those changes were made. Some of the changes I made myself, once somebody had identified what needed to be done. So a lot of those changes I did do after agreeing with the team, the working group that I worked with, what changes were needed. Just to be clear as to the extent or limitations of your role, you weren't involved in the initial rollout of the Horizon training programme, i.e. existing subpostmasters and counter staff, their training on the new Horizon System? No. That was down to, I think, the company responsible for the design and build and rollout of the system?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q. A. Q. Q.	a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of them all and yes, so I just made sure that those changes were made. Some of the changes I made myself, once somebody had identified what needed to be done. So a lot of those changes I did do after agreeing with the team, the working group that I worked with, what changes were needed. Just to be clear as to the extent or limitations of your role, you weren't involved in the initial rollout of the Horizon training programme, i.e. existing subpostmasters and counter staff, their training on the new Horizon System? No. That was down to, I think, the company responsible for the design and build and rollout of the system? Yes. Which became Fujitsu?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. A. Q. A.	a group make sure that the changes were made to all the materials in the course. Did you hold the pen, as it were, over the changes to the manual or the materials? Yes, I sort of like you know, I was the custodian of them all and yes, so I just made sure that those changes were made. Some of the changes I made myself, once somebody had identified what needed to be done. So a lot of those changes I did do after agreeing with the team, the working group that I worked with, what changes were needed. Just to be clear as to the extent or limitations of your role, you weren't involved in the initial rollout of the Horizon training programme, i.e. existing subpostmasters and counter staff, their training on the new Horizon System? No. That was down to, I think, the company responsible for the design and build and rollout of the system? Yes. Which became Fujitsu?

11

1 November 2000 and from that time onwards you had an 2 administrative function; is that right? 3 Α. 4 Q. Would a fair description of that be having 5 responsibility for the maintenance of the new entrant 6 counter training materials? 7 A. That's right. 8 Was that a regional role or a national role?

- 9 National. Α.
- 10 Q. Was it -- I was going to say just you. That sounds 11 terrible. Was it you or was there anyone else doing it?
 - A. Well, I was the only person who did that role, but I had support from the team, the wider training team.
 - Q. What support did the wider training team give you?
 - A. They would be involved in changes. So I organised a group from the team, sort of like so there was some trainers, some training managers, and a trainer coach which was sort of a high level of manager, and we had regular meetings to discuss changes to the course materials. So their input helped identify changes that we needed to make, any amendments.

So that's where the support was in that their knowledge and experience of using the training materials sometimes identified improvements, and obviously then, if there were any changes to products, then we would as 10

programme?

- 2 A. Yes, just the new entrant training, yes.
- 3 Q. And that obviously included an element, a significant 4 element, of training on the Horizon System?
 - A. Yes.
 - Q. Now, you say in paragraph 17 of your witness statement, if we just turn to that, please, which is on page 5, in the third sentence, the fourth line:

"The training course changed in length and content over the years. Initially the classroom course was only available to Branch Office staff but after making changes it was offered to subpostmasters."

When did that change take place?

- A. I don't recall exactly when that was.
- 15 Q. Can you recall why the new entrant training as 16 a classroom course was only available to branch office 17 staff?
 - A. No, I don't know why.
 - Q. And only rolled out to those becoming subpostmasters
 - Α. Yes, I don't know why that decision was made to change
 - Q. I'm looking at it the other way round: why the decision was made not to include subpostmasters from the outset.
 - I don't know because --

1	Q.	I know it wasn't your decision presumably.	1	Α.	I think with counter staff, as far as I'm aware, they
2	A.		2		were able to book into accommodation, like hotels, if
3		or it was mandatory for branch office staff. That was	3		they were a long way from a CTO counter training office,
4		in place when I joined in '86 actually. So I don't know	4		which that didn't apply to subpostmasters.
5		why that was how it was, but that was how it was when I	5	Q.	So it was about accommodation relating to attendance
6		joined.	6		that
7	O	You say, picking up on what you've just said, if we go	7	Α.	
8	۵.	over the page to paragraph 21:	8		So, if it was a long way from because we had several
9		"New entrant training was offered to all new	9		around the country, but obviously not everybody was able
10		subpostmasters although was mandatory for Branch Office	10		to travel perhaps on a daily basis to a counter training
11		staff."	11		office. So they were put up in hotels to enable them to
12		Are you drawing a distinction there between one	12		attend.
13		being optional and one being mandatory?	13	0	That was the reason why it was only voluntary attendance
	۸		14	Q.	
14 15	A.	At a later date, once the classroom training was offered to subpostmasters, it was offered to them rather than	15		for subpostmasters? No, I don't believe that is why it was only voluntary
			16	Α.	
16	_	being mandatory like it was for branch office staff.			for subpostmasters. I don't think they were the
17	_	Why was that?	17		business would pay for them to go to the hotel, but
18	A.	I don't know, to be honest.	18	_	I don't know.
19	Q.	,	19	_	Other than that you don't know the reason?
20	Α.	Because I'm guessing that, when a subpostmaster takes	20	Α.	That's my assumption really.
21		over a post office, they've got a lot to deal with.	21	Q.	Okay, thank you.
22		They may not have been able to take the time out to go	22		Now, I think there came a time when the audit team
23		to the classroom training. The location of the	23	_	merged with the training team.
24	_	classrooms might not have been suitable.	24	_	That's right, yes.
25	Q.	Why didn't those things apply to counter staff? 13	25	Q.	After that time, you had responsibility for maintaining 14
1		the audit documents and tools as well as the training	1	Α.	Well, it says 2008, so I trust it was 2008.
2		documents and tools.	2		Okay. What were the reasons, as you understood them,
3	Α.	That's right, yes.	3		for the merger of the two teams, audit and training?
4		Again, was that a national responsibility?	4	Α.	I think I don't know for sure, but my guess is that
5	Α.		5		it was to utilise the number of trainers that we had,
6		So, if from whenever this date was we'll establish	6		you know, to make the trainers multi-skilled, because
7		the date in a moment if we can somebody was to ask	7		there was the training team was quite a large team,
8		who's responsible for the maintenance of policy	8		and I think that was one of the reasons to multi-skill
9		documents or protocol documents relating to audit	9		the field trainers.
10		nationally, that would be you?	10	Q	I was going to ask you that. Were the existing teams,
11	Δ	Yes.	11	α.	the teams of trainers and the teams of auditors, asked
12	Q.		12		to carry out their existing roles, i.e. the trainers
13	Q.	you took up that role?	13		stayed as trainers and the auditors trained as stayed
14	Δ	Not exactly, no. I don't know when that	14		as auditors or, after the merger, did auditors carry out
15	Q.		15		training and trainers carry out audits?
16		Yes, it would have been, yes.	16	Δ	Yes, they did, yes. They wanted all the advisers, as
17		And before 2016 when you left?	17	Α.	they became known, to be multi-skilled to be able to do
18	Α.	Yes.	18		both.
19		Any recollection as to, in that 15 or 16 years, when	19	Q.	
20	Q.	that might be?	20	Q.	might manifest itself in the course of an audit? If
20		that might be:			
21	Λ	From seeing a document on here that you supplied it	21		
21	A.	From seeing a document on here that you supplied, it	21 22		somebody hadn't been properly training about
22		states that it was around about 2008.	22	٨	something
22 23		states that it was around about 2008. Yes. We're going to look at that document a little	22 23	A .	something Possibly, yes.
22 23 24		states that it was around about 2008. Yes. We're going to look at that document a little later in the morning. But you have read that now. Does	22 23 24	Q.	something Possibly, yes they might make mistakes?
22 23		states that it was around about 2008. Yes. We're going to look at that document a little	22 23	_	something Possibly, yes.

1	Q.	And those mistakes might show up in an audit?	1		them, which would apply with the training aspect as
2		If they weren't perhaps following procedures, it might	2		well.
3		do. The audit was primarily to check the assets in the	3	Q.	So it's the geographical limitation that means you might
4		branch against what the Horizon System, when Horizon was	4		get the same person that trained you as a year or two
5		in, said there was. So I suppose, if somebody hadn't	5		later auditing you?
6		been trained properly in those procedures, they could	6	A.	Yes.
7		make errors.	7	Q.	You refer we needn't turn it up in paragraph 46 of
8		The audit also included other areas such as	8		your witness statement to trainers being trained on
9		compliance. So the auditors would check compliance as	9		audit tools and shadowing auditors and vice versa. Is
10		well.	10		that because they were required to multitask?
11	Q.	Compliance with what?	11	A.	Yes.
12	A.	Anti-money laundering and areas like that.	12	Q.	Was that from 2008 again?
13	Q.	So regulatory compliance?	13	A.	Yes, it would have been, yes.
14	A.	That's right, yes.	14	Q.	Can we look, please, at a document POL00043806. This is
15	Q.	Would it ever be the case that a person that had been	15		going to come up on the screen for you. It's going to
16		trained by a training and audit adviser would then be	16		be so complicated to find where you are on that. This
17		audited by that same person?	17		document, take it from me, describes you as the audit
18	A.	Possibly, yes.	18		and training adviser.
19	Q.	Is that because the pool was relatively small and	19	A.	I haven't seen anything yet.
20		geographically based?	20	Q.	I think it's coming up on the screen now. If we go over
21	A.	The pool of	21		to the next page, please.
22	Q.	Training an audit adviser.	22	A.	I can't see anything on my screen at the moment.
23	A.	That was quite a large number of people, but obviously	23	Q.	Just wait a moment. Somebody will come out and help.
24		I think, when they were scheduled to attend an audit,	24		Can you now see?
25		the advisers would be allocated a branch fairly local to	25	A.	Yes, I can.
		17			18
1	Q.	In the time that that's taken, I've now lost you. Take	1	Α.	No.
2		it from me this describes you as an audit and training	2	Q.	You would have called them trainers?
3		adviser.	3	A.	Yes.
4	A.	Yes.	4	Q.	And the people doing the auditing, you would have seen
5	Q.	Is that right?	5		them as auditors, not advisers.
6	A.	That was the role I was at the time, yes. That would	6	A.	No, not really, no.
7		have been my title, yes.	7	Q.	Did you in fact give advice at all to anyone?
8	Q.	So, if you had to fill out a passport application and	8	A.	Not really, no. I don't think so.
9		they said, "What's your job title", you would have	9	Q.	Did you advise over the content of the changes to the
10		written in it "audit and training adviser"?	10		training materials and audit materials, or did you just
11	A.	Yes.	11		administrate the changes that were made by others?
12	Q.	Who did you advise, or is that a misdescription?	12	A.	I did have I suppose I would have had input into
13	A.	Yes, I didn't sort of advise as such.	13		that, into the changes.
14	MR	R BEER: Sorry, the document can be taken down now	14	Q.	What do you mean by you would have had input? Can you
15		particularly as it was of no use to me.	15		give us a feel for the extent of your involvement?
16	A.	I think we were all called advisers in some format, like	16	A.	For example I'm trying to think of an example
17		the field support advisers, they were the	17	Q.	So when Horizon Online came in, say in 2010, there would
18		trainers/auditors. The role name changed my role	18		have needed to be a change to the training
19		name changed over the course of the years I did it but,	19		manuals/materials?
20		you know, I don't really call myself I don't recall	20	A.	Yes.
21		being an adviser as such.	21	Q.	Would you have sent a memo out to trainers or manager
22	Q.	You wouldn't have seen yourself as an adviser?	22		trainers and said, "This thing is coming in, we need
23	A.		23		some content, please suggest the content", they send it
24	Q.	Just like the people that were doing the training, you	24		in, you collate it, or would you have said, "No, I don't
25		wouldn't have seen them as advisers?	25		think that's a very helpful suggestion to a change to 20

1		the materials. I think it would be better worded like	1		28 September 2011, Audit Review Cascade. On the first
2		this"?	2		page there's mention of Sue Richardson, the
3	Α.	Yes, I suppose I did have that sort of input, like	3		Projects & Standards Manager.
4		I would perhaps make sure that it was any training	4		On the second page of the slides under heading
5		material, as in trainer notes that they would have to	5		"Background", it says:
6		refer to if they were running a course, for example, was	6		"Early 2008 the network support field team (NSFT)
7		legible and easy to understand for the person delivering	7		took over responsibility for financial and compliance
8		it, and that it was grammatically correct and that sort	8		auditing from the national audit team."
9		of thing. So that sort of thing, really.	9		Is that the document you were referring to earlier
10	O.	So that makes it sound as if your role was still	10		when you referred to the date being 2008?
11	Ψ.	relatively administrative	11	Α.	Yes.
12	Α.	Yes.	12		It refers to that team taking over responsibility for
13		making sure that things were grammatically correct	13	Φ.	financial and compliance auditing. Was there any other
14	۵.	and made sense, rather than making changes to or	14		kind of auditing?
15		suggesting changes to issues of substance?	15	Α.	
16	Δ	Yes, yes, and I was responsible for making sure version	16	Q.	
17	Α.	control was kept up to date, and make sure things	17	Α.	Financial audits and the
18			18	Q.	
19		were and communicated to the team. So, when changes were made, I would, you know, make sure that one was	19		Yes.
20		aware of those changes.	20		If we just go forwards to page 10 of this document,
21	0		21	Q.	, ,
22	Q.	Can we look, please, at POL00085658. This is a set of	22		please, chapter 2 of the slides appears to refer to you
		slides that you, I think, refer to in your witness	23	^	and Mr Paul Humber giving the presentation. Yes.
23		statement because the Inquiry had shown them to you			
24		that is paragraph 53 of your witness statement and we	24		Who was Paul Humber?
25		can see this is a set of slides headed 21	25	A.	Paul Humber was a field support adviser. He was 22
1		originally in the audit team prior to joining with the	1		with Paul, that's why me and Paul were delivering this
2		training team, and he was a very knowledgeable and	2		section, and these are the changes that were suggested
3		experienced auditor.	3		for this particular section.
4	Q.	You probably don't remember delivering this session but,	4	Q.	And this is all about audit rather than training?
5		looking at the slide, it suggests you maybe delivered it	5		This is audit, yes, and yes, so these are the
6					
7		together with him.	6		feedback that we would have received, and that's what.
•	Α.	together with him. Yes that	6 7		feedback that we would have received, and that's what,
8	_	Yes, that	7	O	you know, the details what we did.
8 9	Q.	Yes, that Is that a fair inference?	7	Q.	you know, the details what we did. In the course of the suggestions and the responses,
9	Q. A.	Yes, that Is that a fair inference? Yes, I think so, yes.	7 8 9	Q.	you know, the details what we did. In the course of the suggestions and the responses, there's reference to debts in branch accounts being
9 10	Q. A.	Yes, that Is that a fair inference? Yes, I think so, yes. If we look over the page, please, to page 11, can you	7 8 9 10	Q.	you know, the details what we did. In the course of the suggestions and the responses, there's reference to debts in branch accounts being shown up on audit. What experience at this time did you
9 10 11	Q. A.	Yes, that Is that a fair inference? Yes, I think so, yes. If we look over the page, please, to page 11, can you help us as to what this is describing or doing, what's	7 8 9 10 11	Q.	you know, the details what we did. In the course of the suggestions and the responses, there's reference to debts in branch accounts being shown up on audit. What experience at this time did you have of debts or discrepancies showing up in branch
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1	Q.	Were the causes of such debts or discrepancies ever fed	1	Q.	Did you assume that it had been through some process of
2		back to you?	2		procurement and testing and validation, for example?
3	Α.	No, no	3	Α.	Yes, yes.
4		Did anyone mention that by this time, September 2011,	4		That you assumed that the Post Office wouldn't roll out
5		that Horizon itself might be causing debts or	5		a system that was riddled with errors?
6		discrepancies to be shown?	6	Α.	That's right, yes.
7	Α.	No, not at all.	7		To your knowledge, was that trust in the system ever
8		That the system itself was responsible for creating and	8		called into question?
9		creating falsely shortfalls?	9	Α.	No, not from what I recall.
10	Α.	No.	10	Q.	
11	Q.		11	Ψ.	defects in it
12		moment right up until 2016, had you ever heard of	12	Α.	
13		such a suggestion?	13	Q.	that were liable to produce false data?
14	Α.	No.	14	Α.	No.
15		Overall, how did you regard the robustness and	15	Q.	Now, you have already told us that document can come
16	Ψ.	reliability of the data produced by Horizon from, say,	16	α.	down, thank you that the training machines used for
17		November 2000 until you left the organisation in 2016?	17		training on Horizon were not live, in inverted commas,
18	Δ	I trusted it, I suppose. We worked with the system, we	18		so were therefore different to those used out in the
19	Α.	expected it to be right, and we trusted the information	19		field; that's right?
20		that it produced.	20	۸	Yes.
21	0	And why did you trust it?	21	Q.	Do you know why that was, that the machines used to
22		I don't know really. I suppose it's because we we	22	Q.	train people were in that respect different from those
23	Α.	I was just going to say trust again. I don't know why I	23		that they would then use when they got out into the
23 24					field?
		trusted it, because we hadn't any other reason not to	24		
25		I suppose. 25	25	Α.	I think it's so that there could be no danger of any 26
1		transactions that were conducted in the training going	1		it would be different in the field, because the amount
1		transactions that were conducted in the training going	1		it would be different in the field, because the amount
2		into the live estate, if you like. I don't know for	2		of transactions and stock and cash that we held within
2	0	into the live estate, if you like. I don't know for sure.	2		of transactions and stock and cash that we held within the classroom environment was very small. So, when they
2 3 4	Q.	into the live estate, if you like. I don't know for sure. Do you know whether any consideration was given to	2 3 4		of transactions and stock and cash that we held within the classroom environment was very small. So, when they got to their branch, they're more likely to have had
2 3 4 5	Q.	into the live estate, if you like. I don't know for sure. Do you know whether any consideration was given to partitioning the training system so that that couldn't	2 3 4 5		of transactions and stock and cash that we held within the classroom environment was very small. So, when they got to their branch, they're more likely to have had a lot more of everything. So there's those differences.
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1 section under 3.2.1, you'll see that this records that: 1 Q. So that couldn't be trained on and, more importantly 2 "Each CTO is equipped with freestanding Horizon 2 perhaps, it wouldn't manifest itself to the trainers? 3 3 training systems. A summary of the hardware is listed Α. 4 below" and you'll see what it is. 4 Q. Then if we look at 3.2.2, please: 5 5 "The systems are built as standard training Then under the bullet points: 6 "Each training system is a standalone counter. 6 counters of the type and software level used for 7 7 Two of the counters will be connected to the Epson 200 delivering classroom training to outlet managers and 8 8 inkjet printers. There is no connection to any other their staff during the national rollout of Horizon. At the time of installation the systems mirrored the 9 counter or server and all the counters are identical in 9 10 every way." 10 functionality of the systems being installed in live 11 So this is a reflection of the point that I think 11 offices at the start of national rollout. This release 12 you were making earlier or the evidence that you gave 12 was known as CSR. Since then, an upgrade has been 13 earlier --13 performed at release CSR+, at a level known as CI4. 14 A. Yes. 14 "The systems also reflect the functionality 15 Q. -- that this would differ from any branch in which 15 described in the training workbooks issued on training 16 multiple counters were used out in the field? 16 courses during the national rollout. The training 17 17 counter also features facilities to run and reset POLO~..." 18 Q. Do you know why that was? 18 19 A. No. 19 Can you remember what that was? 20 Q. If there was a particular problem with multiple counter 20 A. No. operation out in the field, if there was a bug or an 21 21 Q. -- "and to reset training data. Note that, unlike 22 22 error or a defect in the system that particularly arose training mode, the training data is not reset 23 when multiple counters were operated together, that 23 automatically at power up, power down or a logout. The 24 wouldn't be apparent in the training setup? 24 CTO counter build currently contains both the standard 25 25 UK training build and the Northern Ireland variant. The A. No. 29 30 1 trainer is able to select which variant to load up and 1 A. I think so, yes. run. This build will also support use of the OKI8P Plus 2 2 Q. But can you remember whether the aim was to replicate 3 printer as well as the Epson Stylus 200. The systems 3 from a software perspective everything in the live 4 feature the same set of training data used by Pathway in 4 estate in the training setup, or whether in fact there 5 training mode and the delivery of training for the 5 were differences? 6 6 rollout programme both at CSR and CSR+. When the CTO A. I can't remember whether there were -- what the 7 systems were refreshed to reflect the functionality 7 differences were, if there were differences. 8 8 being introduced at CSR+, additional data was included Q. Can you remember a part of the system called Riposte? 9 allowing trainers to set exercises which use some of 9 A. Vaguely, yes. 10 Post Office Limited's own training aides: i.e. barcoded 10 Q. Can you help us: if there were, as we now know that bills and barcoded order books." 11 11 there are, errors, bugs and defects in the Riposte 12 This is all detailed in another document. 12 message servers operating in the field in the live 13 Then can you help us then, with that in mind, from 13 environment, would you expect that also to be apparent 14 your knowledge, to what extent did the software in use 14 in the training units? 15 in the training setup differ from that in the live 15 A. Yes, I would -- yes, I would expect so. 16 environment? 16 Q. Can you ever recall that being mentioned as an issue, 17 A. I don't know the specifics, to be honest. I believe 17 that the message servers used by Riposte had defects 18 from reading another document that we had updates via 18 within them? 19 disks. Therefore, the training offices weren't updated 19 A. No. 20 as quickly, I think, as the live environment. I can't 20 Q. About what information they were communicating? 21 remember how the live environment was updated, but 21 No, I don't think so, no.

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that --

Q. There was a timelag?

I know from reading a document that you've shown me that

we received disks in the CTOs to update them. So

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Can we go to POL00035737. Can you see that this is

Q. Can we just fast forward a moment to 2016, please, and

see by the time you left what the position was then.

1		Training Office PoS Training System Requirements"? It's	1		Forces branches, some admin locations and counter
2		dated 15 February 2016, and you can see that you're	2		training offices is part of the branch technology
3		listed as one of the reviewers. I think they must be	3		transformation programme and is known as the front
4		pre your leaving.	4		office application, (FOA) programme. The CTOs (Counter
5	A.	Yes.	5		Training Offices) are used to train all new postmasters,
6	Q.	Do you remember this document at all?	6		WH Smith colleagues and Post Office branch colleagues.
7	A.	Not before seeing it	7		Each counter training office classroom is a live branch
8	Q.	More recently?	8		on Horizon Online using live reference data, but all
9	A.	No, that's right.	9		transactions processed are clearly differentiated so
10	Q.	Now you've seen it more recently, can you tell us what	10		that training transactions are stored separately from
11		the purpose of the document was?	11		the live transactions."
12	A.	I think well, as it says, it's stating our	12		That's what I referred to earlier as partitioning.
13		requirements our, this is Post Office requirements	13	A.	Right, okay.
14		for the training system.	14	Q.	Can you remember that by this time, by 2016, the
15	Q.	And so who was it issued to?	15		position was that in the classroom, in the CTOs, each
16	A.	Fujitsu, I'm guessing.	16		classroom was a live branch using Horizon Online and
17	Q.	If we look at page 4 of the document, please, just	17		used live reference data?
18		familiarising ourselves with the background:	18	A.	Yes, with Horizon Online, yes.
19		"Post Office undertaking a major transformation of	19	Q.	Can you remember when that change took place, that in
20		its IT systems, hardware and networks. This is known as	20		the classroom live reference data was used for training?
21		the Branch Technology Transformation programme."	21	Α.	No, I don't remember exactly when that was.
22		Does that ring a bell now?	22	Q.	Was it timed at the same time as the introduction of
23	Α.	Yes, vaguely not so well, to be honest.	23		Horizon Online, or did it come in after the introduction
24	Q.		24		of Horizon Online?
25		Horizon Online used in all Post Office branches, British	25	Α.	I don't remember.
		33			34
		33			34
1	O		1		
1 2	Q.	Do you know why the change was made, that live data was	1 2	Q.	that.
2		Do you know why the change was made, that live data was used, live reference data was used?	2		that. Was this a constant sort of niggle or concern?
2	Α.	Do you know why the change was made, that live data was used, live reference data was used? No.	2		that. Was this a constant sort of niggle or concern? I think in the early days of Horizon it was, because
2 3 4		Do you know why the change was made, that live data was used, live reference data was used? No. Can you therefore not help us as to what prevented that	2 3 4		that. Was this a constant sort of niggle or concern? I think in the early days of Horizon it was, because of but, once we got Horizon Online, obviously the
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2 3 4 5 6	A. Q.	Do you know why the change was made, that live data was used, live reference data was used? No. Can you therefore not help us as to what prevented that from happening whilst you were responsible for the national training documents before then?	2 3 4 5 6		that. Was this a constant sort of niggle or concern? I think in the early days of Horizon it was, because of but, once we got Horizon Online, obviously the screens that we could see were the same, and the processes, you know, were the same as well. But we
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express that. But I don't know why -- I don't know what

the reasoning was as to why we couldn't always have

might have been a barrier to getting, you know, a more

up-to-date system for training.

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2 operated in the classroom manifested bugs, errors and 3 defects? 4 **A.** No. 5 Q. Can we turn to updates to the training equipment and 6 software and in paragraph 32 of your witness statement, 7 if we just turn that up please, 32 which is on page 8, 8 you say: 9 "I can recall that the training Horizon systems in 10 the CTOs were not always up-to-date so trainers had to 11 talk through some transactions that could not be 12 completed on the training Horizon system. When we first 13 received the training Horizon systems, I don't recall us 14 having input into what was on the systems." 15 So dealing with the first part of that first, the 16 systems in the classroom not always being up-to-date and 17 so trainers had to talk through some transactions 18 without being able to demonstrate them or tutees being 19 able to conduct them? 20 A. On the Horizon System, yes. We could explain how to do a transaction physically but not necessarily on the 21 22 23 Q. Was that because of the system not being live? Is this 24 a function of or a consequence of the system not being 25 live? 37 A. I don't think so. I don't think it was. I don't know. 1 2 Q. So the system was sort of standalone in the classroom? 3 A. I can't remember how worked, to be honest. I think it 4 was just in the classroom, I think. 5 Q. What did it emulate? 6 A. Responses from DVLA. So, if you scan a barcode of 11, 7 it would emulate a response that you would receive in 8 the live environment from DVLA. The same for banking, chip and PIN transactions. 9 10 Q. Any other examples, please? 11 A. I can't remember. 12 Q. Was it supposed to emulate third party, as you called 13 them, transactions? 14 A. Yes, yes. I can't remember any others. 15 Q. Was it part of the training to do balancing? 16 A. Yes. 17 Q. Did the emulator have any role in balancing? 18 A. No. 19 Q. Can we go, please, back to Fujitsu00001703. Remember we 20 looked at this a moment ago? Can we go to page 12, 21 please, and under the heading "Upgrading the Software 22 Level", at number 5, the first paragraph, the 23 document -- remember this is late 2012: 24 "The systems will receive software upgrades as

planned and agree between Pathway and Post Office

Q. Was it ever reported back to you that the system as

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- A. Possibly, or that it was when we had the disks to update. I can't remember exactly. Also, as I mentioned previously with the emulator, that would emulate responses, but with the pensions instance, that's the main one really that comes to mind from looking at the documents. So, you know -- I can't remember exactly which transactions that we couldn't do, but I know there were some that they couldn't physically do on the system. But I think the thought was that it wasn't a major issue, because the trainer could talk through it, and the person would then receive on-site training in their branch, so therefore they would see the transaction live.
- Q. The emulator, was that connected to anything outside of the room?
- A. I don't know.
- Q. We know that the way that Horizon operated is that there were connections to servers held in other parts of the country, up in Bootle, for example, and one of the issues that we've been exploring is errors, bugs and defects in the local servers' communication with sending messages to and from the servers up in Bootle.
- A. Right.
- Q. Can you recall whether the emulator was connected to anything in that way?

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Limited."

I think that's meant to read "and agreed between Post Office and Pathway":

"... because of the standalone nature of the systems, it is not possible to keep them up to date with the reference data changes which are regularly sent to the networked systems installed in the live post office outlets. Each counter is fitted with a removable hard disk. This enables replacement disks to be easily swapped in and out on site for the purpose of upgrading the systems to a newer release when required."

Is that what you were referring to earlier about updates not being automatic but there being a lag?

- A. Yes.
- Q. And then, if we go over to page 13, please, and scroll down, please, three paragraphs from the bottom there, the document provides:

"For clarification, there is no support in the training counter for PIN pads, debit card method of payment (or NBS) [Network Banking Services] since these features are not supported in training mode. Support for these features would require additional development and testing effort and would need to be requested separately."

That reflects the fact, doesn't it, that there

1		were differences, perhaps significant differences,	1	MR	BEER: Now, you were involved in training, as we've
2		between the training machines operated as compared to	2		discussed, and had responsibility for the training
3		a live operating environment; is that right?	3		materials from when you returned from maternity leave in
4	Δ	Yes.	4		November 2000 until you took redundancy some 16 years
5		Would you agree that one benefit of having the live	5		later.
6	۵.	reference data and essentially a live system operating	6	A.	Yes.
7		in the CTOs would have been that, if there were errors,	7		One of the things that training, good training, is
8		bugs and defects in the operation of Horizon, they would	8	α.	supposed to prepare trainees for is would you
9		have manifested themselves to the trainers?	9		agree when things go wrong with the systems that they
10	Δ	Yes.	10		are using?
11	Q.		11	Δ	Yes.
12	Α.		12		And one of the things that training, good training, is
13		Yes.	13	α.	supposed to prepare for is that, where there are known
14		Or after after 2008 rather, yes.	14		problems or difficulties in the operation of a system or
15		Well, both before and after 2008.	15		in the operation of the processes that the trainees are
16		Yes, yes, that is right, yes.	16		going to be able to, or going to be required to use,
17		R WYN WILLIAMS: I'm sorry, Mrs McBride, you dropped your	17		good training informs them of such problems in advance?
18	Jir	voice in that last exchange. Could you just say what	18	٨	Yes, yes.
19		you told Mr Beer, please.	19		•
20	۸			Q.	It shouldn't be facing the training just towards a rosy world where everything is perfect; it should be looking
21	A.	I was just saying initially I said before 2008 and then I said after.	20 21		
22	e I E	R WYN WILLIAMS: Yes.	22	٨	at a world where things perhaps go wrong? Yes.
23					
23 24	A.	And then Mr Beer did say before as well and I said yes,	23 24	Q.	In that 16-year period that we're talking about, were
25	e I E	that is right.	25		you ever told directly of any problems that arose with
25	SIF	R WYN WILLIAMS: Fine. Thank you. 41	23		the Riposte messaging system? 42
1		No	4		Voc. voc.
1		No.	1		Yes, yes.
2		Did you ever hear any discussion, even overhear	2		I think that some of the training documents for which
2		Did you ever hear any discussion, even overhear discussion amongst others, about problems with the	2		I think that some of the training documents for which you were responsible similarly appear to acknowledge
2 3 4	Q.	Did you ever hear any discussion, even overhear discussion amongst others, about problems with the Riposte messaging system?	2 3 4		I think that some of the training documents for which you were responsible similarly appear to acknowledge that mistakes may need to be corrected by
2 3 4 5	Q. A.	Did you ever hear any discussion, even overhear discussion amongst others, about problems with the Riposte messaging system? No.	2 3 4 5	Q.	I think that some of the training documents for which you were responsible similarly appear to acknowledge that mistakes may need to be corrected by subpostmasters; is that right?
2 3 4	Q. A.	Did you ever hear any discussion, even overhear discussion amongst others, about problems with the Riposte messaging system? No. Were you ever told directly of any problems with	2 3 4	Q. A .	I think that some of the training documents for which you were responsible similarly appear to acknowledge that mistakes may need to be corrected by subpostmasters; is that right? Yes.
2 3 4 5 6 7	Q. A. Q.	Did you ever hear any discussion, even overhear discussion amongst others, about problems with the Riposte messaging system? No. Were you ever told directly of any problems with Horizon's EPOSS system?	2 3 4 5 6 7	Q. A .	I think that some of the training documents for which you were responsible similarly appear to acknowledge that mistakes may need to be corrected by subpostmasters; is that right? Yes. If we can look at one of them, please, POL00035624.
2 3 4 5 6 7 8	Q. A. Q. A.	Did you ever hear any discussion, even overhear discussion amongst others, about problems with the Riposte messaging system? No. Were you ever told directly of any problems with Horizon's EPOSS system? No.	2 3 4 5 6 7 8	Q. A . Q.	I think that some of the training documents for which you were responsible similarly appear to acknowledge that mistakes may need to be corrected by subpostmasters; is that right? Yes. If we can look at one of them, please, POL00035624. Thank you. Can you help us as to what this document is.
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2 3 4 5 6 7 8 9 10 11 12 13 14	Q. A. Q. A. Q. A. A.	Did you ever hear any discussion, even overhear discussion amongst others, about problems with the Riposte messaging system? No. Were you ever told directly of any problems with Horizon's EPOSS system? No. Did you hear about any problems concerning the Horizon EPOSS system? No. Were you ever asked by anyone else within Post Office to address problems in the field in the training materials? No.	2 3 4 5 6 7 8 9 10 11 12 13	Q. A. Q. A. Q.	I think that some of the training documents for which you were responsible similarly appear to acknowledge that mistakes may need to be corrected by subpostmasters; is that right? Yes. If we can look at one of them, please, POL00035624. Thank you. Can you help us as to what this document is. I believe this is like a training brief for the trainer; that's their script, if you like. So notes addressed to a trainer to tell them how to train? Yes how to deliver the How to deliver the training?
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the first class book of stamps. They came in packs of So. So. if the learner had put in one book of stamps and the instructions to trainer are: "To accept stock to a branch the individual pieces of stock will be entred manually none they have been checked. In the classroom setting, this is identical to the harmon other than the scanning of the pouch harcode during the delivery stago. Talk the learners" The learners, that means the people being trained, yes? A. Yes. 12 A. Yes. 13 Q. " through the path to the stock rem screen." 14 The same instructions are given. Are they they been checked. In the path to the stock rem screen." 15 A. Yes. 16 Q. "At this point, remind the learners that the quantity button needs to be used to stop errors in volume. If the button needs to be used to stop errors in volume. If the submanced on correction, and this missake ould mask to subsess that would have to be made good when the 25 than scale on correction, and this missake ould mask to subsess that would have to be made good when the 25 than scale on correction, and this missake ould mask to a subsess that would have to be made good when the 26 than subsessed on correction, and this missake ould mask to a subject that to be the same as well to a subject modal mask to the substance of the submance of the button one book of attempts that the substance of the submance of the button of the button of the button needs to be used to stop errors in volume. If the substance of the properties of the properties of the substance of the properties of the properties of the properties of the properties of the properti	1		cash, then you it's a way of getting it out of the	1	Δ	No, basically I think this area is around the example of
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transaction correction was received.* Can you explain what these instructions are telling the trainer about. 45 defect 1	21		transaction correction, and this mistake could mask	21	Q.	
24 Can you explain what these instructions are 25 telling the trainer about. 45 25 poperation of Horizon — this isn't about a bug, error of 46 1 defect — 1 A. I don't know for sure, but I would imagine it's human error to perhaps — you know, to especially in that instance where something comes in as a block and you create imbalances like this unintentionally? 4 count it as one and actually it's 50. So that — you from it, don't you? But I would imagine it's human error eate imbalances like this unintentionally? 4 count it as one and actually it's 50. So that — you wake a mistake once and then you learn, obviously from it, don't you? But I would imagine that happened quite frequently. 9 A Yes. 7 from it, don't you? But I would imagine hat happened quite frequently. 10 a subpostmaster? 10 this, where you could see that it's an error easily made that A. No, absolutely. 11 that came up on Horizon which said, "Check that you in for sure. 10 Would that be your first thought, if there was an imbalance, it must be the subpostmaster that's taken the money? 14 A. I can't remember. I don't think so but I can't remember for sure. 10 A. No. 15 for sure. 11 A. I can't remember. I don't think so but I can't remember for sure. 12 A. Because they might have just entered a figure in incorrectly into the system. They might have miscounted 18 user to say: "Stop, think, do you really mean that?" 19 their cash and then put the incorrect figure or stock in 19 A. I don't recall any? 12 A. A how many of these — I mean, this is quite a neat example here that we're looking at on the screen. How many of these types of issue were there? 23 Q. Did the system communicate back to the user in that way, so user messages? 12 G. Yes. 25 A. I can't recall.	22		losses that would have to be made good when the	22	A.	Widespread absolutely, yes.
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Q. Why not? A. Because they might have just entered a figure in incorrectly into the system. They might have miscounted their cash and then put the incorrect figure or stock in the same way. Q. And how many of these I mean, this is quite a neat example here that we're looking at on the screen. How many of these types of issue were there? A. With the example? Q. Yes. Q. I.e. the system recognising the likelihood or possibility of unintentional error, and prompting the user to say: "Stop, think, do you really mean that?" A. I don't recall. A. I don't recall any? A. No, I don't I'm not no, I can't remember what the system showed. C. Did the system communicate back to the user in that way, so user messages? A. With the example? A. I can't recall.	14		money?	14	A.	I can't remember. I don't think so but I can't remember
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24 A. With the example? 24 so user messages? 25 Q. Yes. 25 A. I can't recall.	23		many of these types of issue were there?	23	Q.	Did the system communicate back to the user in that way,
25 Q. Yes. 25 A. I can't recall.	24	A.		24		
47 48	25			25	A.	I can't recall.
			47			48

(12) Pages 45 - 48

1	Q. In any event, this kind of error you would expect	1	Δ	No.
2	knowledge of it to be the same in the auditing community	2		It was carried out by people described, at one stage
3	as in the training community?	3	α.	certainly, as field support advisers?
4	A. I think so, yes, yes.	4	Δ	Yes.
5	Q. Certainly after merger, because they are the same	5		Were they within your area of responsibility?
6	people?	6		On a couple of occasions I did manage some field
7	A. Yes, yes.	7	۸.	advisers or trainers during that time.
8	MR BEER: Sir, it's just coming up to 11.20. I wonder	8	0	Can we look at a document that might assist us here,
9	whether we might take the morning break. Thank you very	9	Q.	POL00034108.
10	much, sir. Can we say 35 past?	10		Can you see the title of the document,
11	SIR WYN WILLIAMS: Yes, certainly.	11		"Information for Field Support Advisers on Post Office
12	MR BEER: Thank you very much, sir.	12		Local Branches", and then that foot of the page you can
13	(11.19 am)	13		barely see it's dated December 2012?
14	(11.19 aiii) (A short break)	14	^	Yes.
15	(11.35 am)	15		Is this a document within the suite of documents for
16	,	16	Q.	which you were responsible?
17	MR BEER: Sir, good morning. Can you see and hear me again?	17	^	Yes.
	SIR WYN WILLIAMS: Yes, I can, thank you.			
18	MR BEER: Thank you very much.	18	Q.	It is, okay. Then, if we look at the second page,
19	Mrs McBride, can we turn to the issue of on-site	19		"Introduction to Post Office Local":
20	training and balancing in particular. The Inquiry has	20		"This document will evolve as the project
21	heard some evidence, and we'll in the coming months hear	21		progresses"
22	some more evidence, about training on balancing being	22		Can you help us with what the project Post Office
23	supplemented by on-site training in the field.	23		Local was.
24	Did you have any involvement in the provision of	24	Α.	That's when branches were open for longer hours. So
25	that training or assistance? 49	25		they would be in a shop, for example, that opened at 50
1	7.00 in the morning until possibly 10.00 at night, and	1		Statement.
2	Post Office services would be available during that	2	Q.	Thank you. Can you tell us what this is referring to
3	time, not just the core hours from 9.00 to 5.30. They	3		this follow-up balance?
4	would be able to provide certain Post Office services	4	A.	That's assistance at the next balance that the branch
5	after that time or before.	_		would be doing once the trainer had left. So
6	and that are or belore.	5		Would be doing offer the trainer flad lott. Co
7	Q. Can we go forwards, please, to page 7 and look in the	5 6		a follow-up is like, once the trainer's left on
7				
8	Q. Can we go forwards, please, to page 7 and look in the			a follow-up is like, once the trainer's left on
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1		support or training out in the field being thought to be	1		together?
2		necessary?	2	A.	Yes.
3	A.	No, I think, prior to this training, we would always	3	Q.	To your knowledge, were any additional staff recruited
4		give support after the branch has been on you know,	4		for this purpose, or was this a function carried out by
5		the subpostmaster has been on their own for a few days.	5		the existing training and auditors?
6		So previously we would do on-site support training, and	6	A.	It was carried out by the existing pool of trainers and,
7		then leave them on their own and then support them at	7		yes, FSAs, as they were known.
8		the balance. Because the balance was I say a	8	Q.	Can we turn back then, please, to POL00032429 to an
9		complicated thing but it could be, you know,	9		earlier upgrade to Horizon before it became Horizon
10		complicated, I suppose, so the support was needed. It	10		Online.
11		was thought that the support was needed in the balancing	11		You'll see this is a note about the upgrade of
12		area.	12		Horizon in December 2002 and, if we go over the page,
13	Q.	Putting it bluntly, was this introduced because there	13		please, and look at the foot of the page, we can see
14		had been problems with balancing?	14		that it's authored by you. At this stage you're
15	A.	Yes, possibly. But I think the idea was that it	15		described as a training or the training manager.
16		wouldn't really be right to let someone just once	16	A.	Yes.
17		a trainer had gone, just be out on their own without any	17	Q.	Did that accurately describe your job as at
18		support, you know. So the balance was the area that it	18		December 2002?
19		was felt that they needed the support in.	19	A.	Yes. That was my role name at the time. I wasn't a
20	Q.	You've referred to it as being, or it could be	20		I didn't deliver training in that respect.
21		complicated, the balancing exercise	21	Q.	Did you manage those that delivered training?
22	A.	It could be. Some people found it a bit confusing,	22	A.	I possibly did at that point.
23		I think.	23	Q.	What did you do to manage them?
24	Q.	And it was crunch time in the sense that it's when all	24	A.	That required having one-to-ones with the team,
25		of the work of the previous trading period came 53	25		cascading any changes to them in team meetings, and 54
		33			6 4
1		seeing them on site periodically while they're training	1		side of the maintenance of the suite of documents?
2		in, or a classroom if they were doing classroom	2		Yes.
3		training.	3	Q.	Were you aware of people being sent for investigation at
4	Q.	Did you have responsibility for documents that regulated	4		that time?
5		when and in what circumstances a reference would be made	5		No. Investigation in can you explain a bit more.
6		to an investigation team?	6	Q.	Yes. An audit had shown a discrepancy, and it was
7	Α.	No.	7		believed that the subpostmaster/member of counter staff
8	Q.	Can you recall if there was a tipping point for	8		were responsible for the discrepancy and it therefore
9		reference of a subpostmaster off to an investigation?	9		required to be investigated.
10	Α.		10		Right.
11	Q.	Did you ever have cause to refer a subpostmaster for	11	Q.	That they might be suspended or their branch closed or
12	_	investigation yourself?	12		there might be civil proceedings against them or they
13		No, no.	13		might be prosecuted for a crime.
14	Q.	Can you recall whether any of the trainers for which you	14	Α.	Okay. I was aware that there were discrepancies found
15		were responsible had cause to refer people for	15		at audits. I don't know the details but I was aware
16		investigation?	16		that, you know, that was something that happened.
17		No.	17	Q.	Were you aware of the follow-on from that, when
18		You can't recall or that didn't happen?	18	_	a discrepancy was found, what happened?
19	_	As far as I'm aware, that didn't happen.	19	Α.	Not the full process but, yes, I was aware that there
20	Q.	What about when they were auditing at branches?	20		could be they would be suspended, you know, if there
	_		21		was a certain amount, I think, that was found to be
21	A.	I didn't manage a team when they were auditors as well			
22	A.	as trainers. They were just trainers when I was	22	_	short, for example.
22 23		as trainers. They were just trainers when I was managing.	22 23	Q.	Were the documents that regulated when somebody was
22		as trainers. They were just trainers when I was	22	Q.	·

1		prosecuted, were those documents within the suite of	1	Q.	No, I meant the involvement of a contracts adviser in
2		documents that you were responsible for?	2	α.	the decision-making process.
3	Α.	The tool that the auditors used to identify	3	Α.	Yes, that would
4		a discrepancy was, yes.	4		That was a regular feature so far as you're aware?
5	Q.	What do you mean by the tool that was used?	5	Α.	Yes, yes.
6	Α.		6		Go back to this document, please, back to page 1. Thank
7		number and it was like pretty much like a big	7		you.
8		calculator really that auditors used to enter all the	8		The first line says:
9		details in from Horizon to get a figure, if you like, an	9		"The new training system is the same the live
10		outstanding figure, a balance or not.	10		system on the counter, up until the middle of
11	Q.	What involvement to your knowledge was there of any	11		October 2002."
12	Δ.	branch managers or area managers in decision-making over	12		Can you recall whether this upgrade that you're
13		investigation or prosecution of subpostmasters?	13		speaking to in this document meant that from that date,
14	Δ	I think the contracts advisers were involved in making	14		the middle of October 2002, one which meant that the
15	,	a decision. That's based really on when I was looking	15		training system could operate as part of the live
16		at the hearing from Friday that Chris was explaining,	16		estate?
17		and I thought: oh, yes that is that did remind me	17	Α.	Sorry, can you say that again.
18		that that is, yes, that was the process I think that, if	18		Yes. You remember we discussed earlier whether the
19		a certain discrepancy was found, then the contracts	19	Q.	standalone unit in the classroom operated as part of
20		adviser would be contacted.	20		the in the same way and as part of the live estate,
21	0	From your memory rather than watching Mr Gilding, can	21		and you said not?
22	Q.	you recall whether that was a consistent feature in the	22	۸	Mmm.
23		•	23		
24	۸	process? I don't know the results of all the audits, so I don't		Q.	I took you to a document that suggested that by 2016
25	Α.	know for sure.	24 25		they certainly did, and you said at some point there was
25		know for sure.	25		that change. You couldn't remember when. 58
1	٨	No	1	٨	No no
1		No.	1	_	No, no.
2		I was asking you now, looking at this document, is that	2	A. Q.	If we scroll down, please, and under Barcoded Bills you
2		I was asking you now, looking at this document, is that first sentence a reflection of the fact that the upgrade	2	_	If we scroll down, please, and under Barcoded Bills you refer to item 28/22H:
2 3 4		I was asking you now, looking at this document, is that first sentence a reflection of the fact that the upgrade allowed the training system to operate as a live part of	2 3 4	_	If we scroll down, please, and under Barcoded Bills you refer to item 28/22H: "Barcoded bill in the name of Ms I Lonely shows on
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A. Q. A. Q. A. Q.	I was asking you now, looking at this document, is that first sentence a reflection of the fact that the upgrade allowed the training system to operate as a live part of the system? Yes, that's what it says, that it's the same as the live system. So I would assume then that the system would have been as it says there, you know, would have been the same then up until October of that year. Well, it doesn't say that the training system was operating as a live part of the system. It says in the first sentence that it is same as the live system; do you see? Yes. I'm just trying to work out with your assistance exactly what it does mean. Can you help us? I can't really remember, to be honest. Put shortly, after this time, did the training units continue to be disconnected from the network, continuing to use an emulator? Yes. So we are in the same position that any bugs, errors or	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A. Q. A. Q. A. Q. A.	If we scroll down, please, and under Barcoded Bills you refer to item 28/22H: "Barcoded bill in the name of Ms I Lonely shows on the screen at £22.50 instead of £82 which is on the bill. This can be changed manually on the screen." That appears to be a reference to a discrepancy in a barcoded bill, yes? Yes, although it does also highlight the fact that, if somebody was only part paying a bill, the amount could be amended on the screen manually. What does item 28/22H refer to? It's a barcoded bill. I don't recall what type of bill it was. What is a barcoded bill? So it could be a utility bill which has a barcode which could be scanned. So somebody comes in with a bill saying, "I want to pay this bill"? Yes. They present the bill to the SPM or counter clerk? Yes.

4		The Mendelshare	4		
1		That's right, yes.	1		change everything else, and we could use that in the
2 3		And they scan a barcode like one does at the shops?	2 3		classroom if we wanted extra examples. But this one, I can't remember whether that was
		Yes.			•
4	Q.	And that comes up on the screen and it show £22.50	4		one that was provided to us, or whether that was one
5		whereas it should show £82, because the bill is for £82?	5	_	I'm not sure where that came from originally.
6		That's right, yes.	6		Can I ask
7		But it's showing £22.50.	7	Α.	I don't know why it was different. I don't know why it
8	_	Yes.	8	_	was different.
9	Q.	,	9	Q.	Can I ask: was the intention here to train people that
10	Α.	I see what you're saying. We've either communicated	10		sometimes there can be a mismatch between what the
11		incorrectly and got the barcodes printed wrongly, the	11		computer shows as the sum due as a result of scanning
12		bills, because we used to get those printed ourselves,	12		a barcode and the actual sum due as printed on the bill
13		or we were told it was for that amount and it wasn't.	13		and, therefore, this was a training device intended to
14	_	I don't recall why that was different in that respect.	14		identify a mismatch between a barcoded sum and the
15		Is this training materials you are talking about here?	15		actual sum?
16	Α.	Yes, 28/22H would have been something that we printed	16		I think from
17		ourselves, but we would have had to obtain it from	17	Q.	Or was this a genuine mistake in your training
18		now, would we have got that?	18		materials?
19		Some items we got from Fujitsu with certain	19	Α.	I think it might have been a mistake although, as it
20		barcodes on, and other things we could produce ourselves	20		says there, it's the way it's said, "This can be changed
21		from our own if you like, our own, bit like a I	21		manually on the screen." It's not saying this has been
22		used to joke and say we're doing a Blue Peter job	22		done on purpose so that you can explain this. So
23		because we would be able to scan like, I could have	23		I think that would be a mistake.
24		my own barcoded bill from you know, from home, and we	24	Q.	In your training materials, made genuinely rather than
25		would change all the details, use the barcode, but 61	25		a deliberate error in order to show trainees that there 62
1		can be a discrepancy between the sum produced by the	1		previously used, and whether the and I think the
2		machine for barcodes and the sum on a bill?	2		upgrade made it so that the amount was different when it
3	A.	Yes, yes, I think it is an error.	3		was scanned perhaps to what it was before. I don't
4	Q.	Were you aware of problems in the live estate of	4		know I can't really remember.
5		barcoding producing a discrepancy between the sum	5	Q.	If you go back to the first page of the document
6		generated by Horizon and the amount on the face of	6	A.	Yes.
7		a bill?	7	Q.	it sounds like that barcoding is a new thing.
8	A.	No, I don't think I wouldn't have enough experience	8	A.	Yes.
9		on the live system to know that. But I wasn't aware of	9	Q.	If you look at the first paragraph:
10		that.	10		"The main differences for us are"
11	Q.	This barcoded bill in the name of Ms I Lonely, it sounds	11		And then if you look at the fourth bullet point:
12		like from the wording here that this is a piece of	12		"Barcoded bills can now be scanned."
13		training material that's rolled out widely; is that	13	A.	Yes.
14		right?	14	Q.	Sounds like this is a new
15	A.	Yes.	15	A.	Yes, that is right. So we used it previously probably
16	Q.	Across the country essentially?	16		without having to scan the barcode, so we could do it
17	A.	Yes.	17		without scanning perhaps. Now that the bills could be
18	Q.	Why not change the barcode rather than if the	18		scanned, this one came back why we didn't take it out
19		intention is to get the correct amount, why not alter	19		or we couldn't get the barcode changed, I don't
20		the training materials to get the right barcode and	20		think. We perhaps could have done. I don't know how we
21		therefore the right amount, rather than leave the wrong	21		would have done that, but
22		barcode in and require a manual change on the screen	22	Q.	Go forward a page, please, and scroll down.
23	A.	I think	23	A.	Again I think the fact that it could be changed
24	Q.	if this wasn't a training aid?	24		manually, it wasn't perhaps a big risk as such to leave
25		I think this was one that we had proviously that we had	25		it in there because it did show as I said it did

25

A. I think this was one that we had previously that we had

it in there, because it did show -- as I said, it did 64

1		show that you could change an amount if somebody didn't	1		saw.
2		want to pay a full amount of their bill, which they	2	Δ	Yes.
3		could do on some utility bills. It showed that we could	3		Of the people listed there, are you the most senior in
4		change it manually on the screen.	4	Φ.	the project team?
5	Q.	These are the final questions I ask on this issue. Just	5	Α.	No.
6		go back to the page, please, and scroll down and just	6	Q.	Who's the most senior there?
7		read the whole of that barcoded bills point again.	7	Α.	That would be Sue.
8		Taking a step back, is this intended to tell	8	Q.	Under project team?
9		trainers that there's a problem with our system of	9	Α.	Under oh, sorry. I think we're all the same.
10		training, and there's a manual workaround to correct it,	10		So you were all the same grade?
11		or is this saying there's a deliberate error and we're	11		Yes. I don't know what Shirley's grade was. So all the
12		using this as a training tool to show people how	12		team leaders and the network services admin and
13		manually to change an amount because of a problem with	13		scheduling team leader and myself are all the same
14		barcoding in the live estate?	14		grade.
15	A.		15	Q.	Can you remember this audit revision or review process?
16	Q.	Thank you.	16	Α.	Vaguely.
17		Can we move forward, please that can come down	17	Q.	What can you vaguely recall? How was it conducted?
18		from the screen to a review of the audit process in	18	Α.	I think, from looking at the other documents that have
19		October 2011 and look at POL00085682.	19		been presented, that we obtained feedback from the team.
20		You will see this document is headed "Review of	20		I'm trying to think. So each team leader was
21		Post Office Limited Audit Processes and Tools" of	21		responsible for a chapter of the audit process manual,
22		October 2011, authored again by Mrs Richardson. You are	22		and they all reviewed their own chapters, and the
23		part of the project team listed there.	23		review that was what the review was. They had to
24	A.	Yes.	24		review their own chapters, and I think this is what that
25	Q.	Your job title is given as Network Change Adviser, as we	25		review is. The team that taken over the audit processes
		65			66
1		were reviewing their own chapters.	1		are reviewed against an annual rolling timetable and are
2		Which were you responsible for; can you remember?	2		the responsibility of the network services team
2	Α.	Which were you responsible for; can you remember? Chapter 2.	2		the responsibility of the network services team leaders."
2 3 4	A. Q.	Which were you responsible for; can you remember? Chapter 2. So that was the slide that we saw earlier?	2 3 4		the responsibility of the network services team leaders." Does that explain why this audit was being
2 3 4 5	A . Q. A .	Which were you responsible for; can you remember? Chapter 2. So that was the slide that we saw earlier? Yes.	2 3 4 5		the responsibility of the network services team leaders." Does that explain why this audit was being conducted in October 2011 or not?
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2 3 4 5 6 7	A . Q. A .	Which were you responsible for; can you remember? Chapter 2. So that was the slide that we saw earlier? Yes. Can you recall what the need was or the requirement for review of the audit process and tools was in	2 3 4 5 6 7		the responsibility of the network services team leaders." Does that explain why this audit was being conducted in October 2011 or not? Yes, I think so, yes. What is this essentially saying is: we took over the
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2 3 4 5 6 7 8 9	A. Q. A. Q.	Which were you responsible for; can you remember? Chapter 2. So that was the slide that we saw earlier? Yes. Can you recall what the need was or the requirement for review of the audit process and tools was in October 2011, what prompted it? No, I don't know what prompted it. Can you recall whether there was an event, or was this	2 3 4 5 6 7 8 9	Q. A .	the responsibility of the network services team leaders." Does that explain why this audit was being conducted in October 2011 or not? Yes, I think so, yes. What is this essentially saying is: we took over the function in June 2008 and there hasn't been this fundamental review until now? Yes.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Q. A. Q. A.	Which were you responsible for; can you remember? Chapter 2. So that was the slide that we saw earlier? Yes. Can you recall what the need was or the requirement for review of the audit process and tools was in October 2011, what prompted it? No, I don't know what prompted it. Can you recall whether there was an event, or was this just a cyclical thing that happened every so often? I think maybe because it hadn't been done since we had taken over the audit side of things in the team. So it was deemed it was in need of happening. I think we get a hint of that, if we go over a couple of pages to page 3 of the document under "Introduction", where Mrs Richardson says: "The network support field team took over responsibility for all POL financial and compliance auditing in June 2008. In Jan 2009 a revision was	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A. Q. A.	the responsibility of the network services team leaders." Does that explain why this audit was being conducted in October 2011 or not? Yes, I think so, yes. What is this essentially saying is: we took over the function in June 2008 and there hasn't been this fundamental review until now? Yes. Is that what it's saying? Yes, I think so. Then the next sub-heading the need for a review: "Since the initial revision of all audit chapters in January 2009, business as usual operational changes have been made. However, a complete review has not been undertaken and there has been no proactive identification or engagement with stakeholders to ascertain that the processes and outputs are fit for purpose and will deliver the business requirements."
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q. A. Q. A.	Which were you responsible for; can you remember? Chapter 2. So that was the slide that we saw earlier? Yes. Can you recall what the need was or the requirement for review of the audit process and tools was in October 2011, what prompted it? No, I don't know what prompted it. Can you recall whether there was an event, or was this just a cyclical thing that happened every so often? I think maybe because it hadn't been done since we had taken over the audit side of things in the team. So it was deemed it was in need of happening. I think we get a hint of that, if we go over a couple of pages to page 3 of the document under "Introduction", where Mrs Richardson says: "The network support field team took over responsibility for all POL financial and compliance auditing in June 2008. In Jan 2009 a revision was undertaken of all the audit process chapters, as a basic	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A. Q. A.	the responsibility of the network services team leaders." Does that explain why this audit was being conducted in October 2011 or not? Yes, I think so, yes. What is this essentially saying is: we took over the function in June 2008 and there hasn't been this fundamental review until now? Yes. Is that what it's saying? Yes, I think so. Then the next sub-heading the need for a review: "Since the initial revision of all audit chapters in January 2009, business as usual operational changes have been made. However, a complete review has not been undertaken and there has been no proactive identification or engagement with stakeholders to ascertain that the processes and outputs are fit for purpose and will deliver the business requirements." You remember the answers you gave a moment ago as
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. A. Q. A.	Which were you responsible for; can you remember? Chapter 2. So that was the slide that we saw earlier? Yes. Can you recall what the need was or the requirement for review of the audit process and tools was in October 2011, what prompted it? No, I don't know what prompted it. Can you recall whether there was an event, or was this just a cyclical thing that happened every so often? I think maybe because it hadn't been done since we had taken over the audit side of things in the team. So it was deemed it was in need of happening. I think we get a hint of that, if we go over a couple of pages to page 3 of the document under "Introduction", where Mrs Richardson says: "The network support field team took over responsibility for all POL financial and compliance auditing in June 2008. In Jan 2009 a revision was undertaken of all the audit process chapters, as a basic starting point for the new ways of working using	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A. Q. A.	the responsibility of the network services team leaders." Does that explain why this audit was being conducted in October 2011 or not? Yes, I think so, yes. What is this essentially saying is: we took over the function in June 2008 and there hasn't been this fundamental review until now? Yes. Is that what it's saying? Yes, I think so. Then the next sub-heading the need for a review: "Since the initial revision of all audit chapters in January 2009, business as usual operational changes have been made. However, a complete review has not been undertaken and there has been no proactive identification or engagement with stakeholders to ascertain that the processes and outputs are fit for purpose and will deliver the business requirements." You remember the answers you gave a moment ago as to how the review of the audit was undertaken, and you

1		chapters, so weren't necessarily the same stakeholders	1		used the tool.
2		for each chapter because each chapter obviously was	2	Q.	So under "Other Stakeholders", network services, field
3		a different area. So I think the team leaders were	3		support team, regional managers, team leaders, field
4		asked to contact the stakeholders and to get their	4		support advisers, scheduling and admin team, and field
5		feedback on the process that we were currently using for	5		change adviser, that's in fact you, isn't it?
6		whatever chapter it was and if it was meeting their	6	Α.	Yes.
7		requirements.	7	Q.	They would be the people that would give you feedback to
8	Q.	When you refer to stakeholders, who are you referring	8		allow you to make any necessary changes to your chapter;
9		to?	9		is that right?
10	A.		10	Α.	Yes, yes.
11		particular chapter. For example, somebody in	11		You see the list of the people on the right there,
12		compliance, for the compliance chapter there would be	12	Φ.	approached for feedback: Julia Marwood, Paul Meadows,
13		you know, they would be a stakeholder.	13		Tracy Marshall, Susan Crichton, Paul Martin, and Dawn
14	0	So, if we go forwards to page 7 of the document under	14		Brookes.
15	Q.	"Stakeholders' Approach for Feedback", under the heading	15		Can you recall whether any feedback was given by
16		"Directorates", do you mean the person listed against	16		them about problems in the now 11-year operation of
17		each of the names there?	17		
					Horizon in the field, by way of errors, bugs and
18		Yes, yes.	18		defects?
19		For each of the directorates listed there?	19	Α.	
20		Yes, yes.	20	Q.	That's something that never occurred to you in this
21		And which of those was yours?	21		16-year period at all? When I say occurred to you, was
22	Α.	I don't think we I can't remember actually, because	22		said to you in this 16-year period at all?
23		chapter 2 was a tool rather than a process. So I think	23	_	No.
24		that if so it was because it was a tool, it was	24	Q.	5.7
25		I suppose the team were the stakeholders, the people who	25		can come down from the screen, that document and look
		69			70
1		at POL00034184. If we can just familiarise ourselves	1	Q.	So the level of responsibility you described to us right
2		with the document, do you recognise this?	2		at the beginning of the session today, ensuring
3	A.	Yes.	3		consistency, readability and no grammatical error, that
4	_	Can you tell us what it is, please.	4		kind of responsibility?
5	Q.				
5	Q. A .	It's what we used to call the balancing handout.	5	A.	Yes.
6	A.	It's what we used to call the balancing handout. We can see at the foot of the page that it's dated	5 6	A. Q.	
	A.	-		_	
6	A.	We can see at the foot of the page that it's dated	6	_	If we look at page 2 of the document, please, there is
6 7	A.	We can see at the foot of the page that it's dated April 2013, so after the audit that was just conducted. Who was it handed out by, and who was it handed out to?	6 7	_	If we look at page 2 of the document, please, there is some guidance on dealing with discrepancies. We can see
6 7 8	A. Q.	We can see at the foot of the page that it's dated April 2013, so after the audit that was just conducted. Who was it handed out by, and who was it handed out to?	6 7 8	_	If we look at page 2 of the document, please, there is some guidance on dealing with discrepancies. We can see that at the foot of the page, that last point under
6 7 8 9	A. Q.	We can see at the foot of the page that it's dated April 2013, so after the audit that was just conducted. Who was it handed out by, and who was it handed out to? It was handed out by trainers. I think we handed it out	6 7 8 9	_	If we look at page 2 of the document, please, there is some guidance on dealing with discrepancies. We can see that at the foot of the page, that last point under "Rollover". Just before we get there, can you tell us
6 7 8 9 10	A. Q.	We can see at the foot of the page that it's dated April 2013, so after the audit that was just conducted. Who was it handed out by, and who was it handed out to? It was handed out by trainers. I think we handed it out as part of the training course, as in the classroom	6 7 8 9 10	_	If we look at page 2 of the document, please, there is some guidance on dealing with discrepancies. We can see that at the foot of the page, that last point under "Rollover". Just before we get there, can you tell us how the document works by reference to those grey scaled boxes with words and numbers in them?
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6 7 8 9 10 11 12	A. Q.	We can see at the foot of the page that it's dated April 2013, so after the audit that was just conducted. Who was it handed out by, and who was it handed out to? It was handed out by trainers. I think we handed it out as part of the training course, as in the classroom training, and that the on-site trainers would have access to copies, if a new entrant once finished in	6 7 8 9 10 11 12	Q. A. Q.	If we look at page 2 of the document, please, there is some guidance on dealing with discrepancies. We can see that at the foot of the page, that last point under "Rollover". Just before we get there, can you tell us how the document works by reference to those grey scaled boxes with words and numbers in them? So they represented the buttons they pressed on Horizon. On the screen? Yes, on the screen, yes.
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6 7 8 9 10 11 12 13 14	A. Q. A.	We can see at the foot of the page that it's dated April 2013, so after the audit that was just conducted. Who was it handed out by, and who was it handed out to? It was handed out by trainers. I think we handed it out as part of the training course, as in the classroom training, and that the on-site trainers would have access to copies, if a new entrant once finished in their classroom didn't have it on site. And were you responsible for some of the content of this document? Yes.	6 7 8 9 10 11 12 13 14	Q. A. Q. A. Q.	If we look at page 2 of the document, please, there is some guidance on dealing with discrepancies. We can see that at the foot of the page, that last point under "Rollover". Just before we get there, can you tell us how the document works by reference to those grey scaled boxes with words and numbers in them? So they represented the buttons they pressed on Horizon. On the screen? Yes, on the screen, yes. So they are essentially a printed depiction of a tile Yes.
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6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Q. A. Q. A. Q. A. Q.	We can see at the foot of the page that it's dated April 2013, so after the audit that was just conducted. Who was it handed out by, and who was it handed out to? It was handed out by trainers. I think we handed it out as part of the training course, as in the classroom training, and that the on-site trainers would have access to copies, if a new entrant once finished in their classroom didn't have it on site. And were you responsible for some of the content of this document? Yes. Did you write it? No. In what way were you responsible for the content of the document? Just making sure that, if any changes were made to the procedure, they were then updated onto the handout and the person responsible for the handout updated it	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. A. Q. A. Q. A. Q. A. A.	If we look at page 2 of the document, please, there is some guidance on dealing with discrepancies. We can see that at the foot of the page, that last point under "Rollover". Just before we get there, can you tell us how the document works by reference to those grey scaled boxes with words and numbers in them? So they represented the buttons they pressed on Horizon. On the screen? Yes, on the screen, yes. So they are essentially a printed depiction of a tile Yes. on the Horizon screen? Yes. The pad? Yes. And in relation to roll stock units, it reads: "At the end of trading period the discrepancy settlement screen appears on the last stock to roll over

1 provide you with an option to settle the discrepancy 1 that Horizon made mistakes? 2 centrally if over £150. If this option is selected then 2 A. I think so, yes. 3 3 you will receive a statement from our accounting team in Q. Were you aware of any process that enabled 4 Chesterfield which provides you with the option of 4 a subpostmaster to challenge a balance as a result of an 5 5 paying by credit or debit card. If the discrepancy is error that he or she believed Horizon had made? 6 due to a known specific error made at the branch, then 6 A. No. 7 7 contact MBSC with the details to enable further 0 There was simply no provision for it? 8 accounting investigations to be made and appropriate 8 Not as far as I'm aware, no. 9 9 accounting corrections to be issued." Q. Can you remember any discussion of whether there should 10 Are you familiar with that part of the process, or 10 be such provision? 11 were you familiar with that part of the process? 11 A. No. 12 A. Not particularly. 12 Q. Can we move forward a little still further into 13 Q. What do you recall about it? 13 May 2013 -- that document can come down -- and look at 14 A. I know that what is detailed on here would have been --14 POL00034208. If you forgive me, I just need to catch up 15 as far as I'm aware, was taken from the operations 15 in the paper. 16 manuals, so the manuals that the counter -- that the 16 If we go to the penultimate page, page 3, can you 17 branches were able to access to get the full procedures. 17 see at the foot of the page an email exchange to which 18 I'm not really familiar with the process. 18 you're not copied. It's between Mr Parsons, Andrew 19 Q. Here provision is made, we can see, for where there is a 19 Parsons, to Gareth Jenkins copied to Simon Baker on 20 known error in the branch, i.e. where the subpostmaster 20 27 April 2013. 21 knows they have made a mistake. 21 "Gareth, Attached is the Horizon Online help for 22 22 A. Mmm. giro transactions. You'll see at the top of page called 23 Q. There's no provision for where Horizon makes a mistake? 23 [and then a character string is given] that the 24 Α. 24 No. subpostmaster is required to 'select to print the office 25 Q. Is that reflective of the fact that it wasn't believed 25 copy' of the giro daily report. This suggests that the 73 74 1 printing of the branch copy of the daily report is not 1 documentation?" 2 automatic as previously thought but requires manual 2 Then up, Simon Baker again: 3 3 input from the subpostmaster. Would you mind looking "Lin, are you able to get back to me? [so 4 into this and confirming the position (for both giro 4 a chaser] I would like to make sure your documentation 5 deposits and giro withdrawals)." 5 reflects reality." 6 Then go up the page, please. In fact, go up to 6 Then from Simon Baker to Lin Norbury, now copying 7 the previous page to the foot so we can see who the 7 in Craig Tuthill and Angela van den Bogerd: 8 8 email was from. It's a reply from Mr Jenkins back to "Craig, Angela, I think Lin might be out. Who 9 9 Mr Parsons copied to Mr Baker. Then forward a page: owns the Help content for the Horizon system? 10 "Andy, I've just had a play on our test 10 Investigations found some errors that I would like to get fixed." 11 system ... It looks like the documentation is wrong. 11 12 12 What surprised me particularly was the fact that the Then over to the previous page, Lin, at the foot 13 Post Office copy is actually printed out before the giro 13 of the page, thank you: 14 14 "Hi Simon. Further to our earlier conversation slips. Simon, is it worth getting James to put together 15 a story board for this as he did for recovery? Also who 15 I have struggled to identify an overall owner for 16 Horizon Online Help. I've spoken to Sandra McBride,

in POL should be updating the user guide? In 16 particular, there is no button to just print the Giro 17 deposits report. It is included in the counter daily 18 report ... is this old Horizon documentation? Though 19

it clearly say Horizon Online, I did think that the slip was printed before the office report, but that could be

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Then go to the previous page, Simon Baker to Lin Norbury:

"Who do I talk to to update Horizon

Horizon rather than Horizon Online."

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A.

manager."

that you remember this call.

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Can you explain what you are recorded as advising there: when training identifies the need to change any

network change support adviser and she advises that,

documentation, she approaches the specific product

Just stopping there, I don't suspect for a moment

when training identifies the need to change any

1		documentation, you approached the specific product	1		products. So whoever was responsible for the
2		manager?	2		maintenance of Horizon Help, who I don't know who that
3	Δ	I think what I'm I would approach the product manager	3		was I can't remember who that was.
4	7	if change mainly it was when changes were coming in	4	0	So your answer is
5		rather than retrospectively. But they owned the	5	Α.	Although Julia says it is the product manager.
6		product, so they would be the experts, if you like, on	6	Q.	Yes. I mean
7			7	Q. A.	Yes.
		their products. So, if we had any clarification needed,			
8		then we would contact the product manager, and they	8	Q.	Lin Norbury continues:
9		would also we also worked with them, as I said, when	9		"I've also spoken to Julia Marwood."
10		changes were coming in, so that we could make the	10		Who was she?
11		changes in time for those changes, when they went live,	11	Α.	She might have been the head of the training team at
12	_	if you like, with our materials and things like that.	12	_	that point. She was at one point.
13	Q.	We saw from the email exchange, summarising it I hope	13	Q.	" and she has confirmed that each product manager is
14		fairly, that there was Horizon legacy material still in	14		responsible for the content of their respective pages
15		the user guide for Horizon Online. I think that was the	15		within the Help menu, but that it is less black and
16		nature of the email exchange.	16		white when it involves issues around general accounting.
17		Did you do anything as a result of that issue	17		Within her network team she has managers that face up
18		being raised with you beyond explaining who had	18		the different product areas, and Stephanie Rush is
19		ownership of Horizon Help?	19		responsible for engagement with the banking team which
20	Α.	No, not as far as I recall, no.	20		is where this particular query lies. As to an overall
21	Q.	Whose responsibility was it to correct that kind of	21		owner I will keep making enquiries."
22		thing?	22		Can you add anything else to this exchange beyond
23	A.	I suppose once whoever was responsible for Horizon	23		what you've said already?
24		help. So I've identified it as being the product	24	A.	No.
25		manager well, that's who we would contact regarding	25	Q.	Okay, I'll move on.
		77			78
1		That document can come down, thank you.	1	Α.	It was from when they transferred so a transfer is
2					
2		In your statement you give some evidence that you	2		when a postmaster takes over a branch.
3		have limited recall of feedback that was provided by			
			2		when a postmaster takes over a branch. So this whole exercise is about people who have moved branches?
3		have limited recall of feedback that was provided by	2		when a postmaster takes over a branch. So this whole exercise is about people who have moved branches?
3 4		have limited recall of feedback that was provided by stakeholders. Can we look at a document, please, that	2 3 4	Q. A .	when a postmaster takes over a branch. So this whole exercise is about people who have moved branches?
3 4 5	A.	have limited recall of feedback that was provided by stakeholders. Can we look at a document, please, that does record some POL00033423. Are you familiar with	2 3 4 5	Q. A .	when a postmaster takes over a branch. So this whole exercise is about people who have moved branches? So, it's a new it would be a new postmaster.
3 4 5	A.	have limited recall of feedback that was provided by stakeholders. Can we look at a document, please, that does record some POL00033423. Are you familiar with this document?	2 3 4 5	Q. A .	when a postmaster takes over a branch. So this whole exercise is about people who have moved branches? So, it's a new it would be a new postmaster. As well. So they haven't moved branches, they are new into a branch?
3 4 5 6 7		have limited recall of feedback that was provided by stakeholders. Can we look at a document, please, that does record some POL00033423. Are you familiar with this document? Yes, it was part of the documents that you sent to me to	2 3 4 5 6 7	Q. A. Q.	when a postmaster takes over a branch. So this whole exercise is about people who have moved branches? So, it's a new it would be a new postmaster. As well. So they haven't moved branches, they are new into a branch?
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. A. Q. A. Q. A. Q. A.	have limited recall of feedback that was provided by stakeholders. Can we look at a document, please, that does record some POL00033423. Are you familiar with this document? Yes, it was part of the documents that you sent to me to review. We can see a date of it at the foot of the page as April 2011 and we can see, I think, your name, your maiden name, as you were the author of it? Yes. And do you recall now writing it? Yes, vaguely. What was the purpose of it? Well, it's reviewing the post transfer visit, PTV, to get feedback from subpostmasters. So three months into the job; is that right? I think it was three months, yes. Why is it called a post transfer visit? I don't know. It was a visit that was arranged after the subpostmaster had been in post for X amount, about three months. I don't know exactly why it was called	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. A. Q. A. Q. A. Q. A. Q. A.	when a postmaster takes over a branch. So this whole exercise is about people who have moved branches? So, it's a new it would be a new postmaster. As well. So they haven't moved branches, they are new into a branch? No. So they are transferring from the old postmaster to a new postmaster. I see. So that's what the transfer it was called a transfer. So this would incorporate old and experienced subpostmasters who happened to have moved branches, no? No. Only new entrants? New subpostmasters. Okay. So when a new subpostmaster went into a branch, bought a branch, a shop with a post office in, they would transfer. It was just called a transfer from the old to the new. So it was from the day they took over the branch, that was a transfer. You say in this document following the training review

1	A.	Postmasters.	1		which successful training could be measured by reference
2	Q.	Does it refer to any counter staff as well or not, or is	2		to feedback?
3		it only subpostmasters?	3	A.	Not that I recall.
4	A.	No, it would be just subpostmasters.	4	Q.	Question 2:
5	Q.	And why are they called agents? What's the	5		"Which transactions do you feel most confident in
6	A.	Again, the terminology changed over the years of what	6		dealing with?"
7		subpostmasters were referred to as. So the common one	7		34 per cent of answers included AP and banking
8		was subpostmasters, but they were also referred to as	8		transactions; 33 per cent included mail transactions;
9		agents.	9		24 per cent included all transactions; 14 per cent
10	Q.	Looking at the questions asked and answered, question 1:	10		included daily or regular transactions; 5 per cent
11		"Do you feel you have had sufficient training to	11		included the basic transactions.
12		enable you to process all Post Office transactions?"	12		Then, by contrast:
13		Only 76 per cent said yes. Was that regarded as	13		"Which do you feel least confident in dealing with
14		a low figure?	14		and why?"
15	A.	No.	15		You'll see the answers there: 4.5 per cent
16	Q.	Why? What was taken from that then? Was that regarded	16		answered:
17		as evidence of sufficiency or success of training?	17		"Balancing."
18	Α.	Well, there was only 88 responses, I think it says at	18		Then over the page, please, sorry to the next
19		the top there.	19		page:
20	Q.	Yes.	20		"Do you feel you've had sufficient training to
21	Α.	So I think that was felt that that was a positive	21		enable you to prepare the office balance?"
22		figure. I don't think we had a target. You know, we	22		72 per cent answered yes. Again can you remember
23		weren't expecting 100 per cent yeses or noes.	23		what was taken from that, that 72 per cent admittedly
24	Q.	I can understand that that you wouldn't expect	24		a relatively small sample of 88 felt confident in
25		100 per cent was there not a target, a metric by	25		preparing the office balance? 82
1	A.	I would think I can't remember exactly, but I think	1	Q.	
2	A.	that we thought we were probably on the right track, you	2	A.	Yes.
2	A.	that we thought we were probably on the right track, you know, what we were providing was sufficient for you	2	A. Q.	Yes. If we go to page 5.
2 3 4		that we thought we were probably on the right track, you know, what we were providing was sufficient for you know, it was a good response, I think, really.	2 3 4	A. Q. A.	Yes. If we go to page 5. We did what our response was to feedback.
2 3 4 5		that we thought we were probably on the right track, you know, what we were providing was sufficient for you know, it was a good response, I think, really. Again, why would that be taken as a good measure of	2 3 4 5	A. Q. A.	Yes. If we go to page 5. We did what our response was to feedback. Scroll down, please. There's your narrative explaining
2 3 4 5 6	Q.	that we thought we were probably on the right track, you know, what we were providing was sufficient for you know, it was a good response, I think, really. Again, why would that be taken as a good measure of success?	2 3 4 5 6	A. Q. A.	Yes. If we go to page 5. We did what our response was to feedback. Scroll down, please. There's your narrative explaining the result. You say:
2 3 4 5 6 7	Q.	that we thought we were probably on the right track, you know, what we were providing was sufficient for you know, it was a good response, I think, really. Again, why would that be taken as a good measure of success? I suppose because it wasn't the other way round, that it	2 3 4 5 6 7	A. Q. A.	Yes. If we go to page 5. We did what our response was to feedback. Scroll down, please. There's your narrative explaining the result. You say: "From the above results the majority of new agents
2 3 4 5 6 7 8	Q.	that we thought we were probably on the right track, you know, what we were providing was sufficient for you know, it was a good response, I think, really. Again, why would that be taken as a good measure of success? I suppose because it wasn't the other way round, that it wasn't 22 per cent said they were you know, they had	2 3 4 5 6 7 8	A. Q. A.	Yes. If we go to page 5. We did what our response was to feedback. Scroll down, please. There's your narrative explaining the result. You say: "From the above results the majority of new agents who completed the feedback questionnaire feel that they
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2 3 4 5 6 7 8 9	Q. A .	that we thought we were probably on the right track, you know, what we were providing was sufficient for you know, it was a good response, I think, really. Again, why would that be taken as a good measure of success? I suppose because it wasn't the other way round, that it wasn't 22 per cent said they were you know, they had sufficient training. And then question 6, please:	2 3 4 5 6 7 8 9	A. Q. A.	Yes. If we go to page 5. We did what our response was to feedback. Scroll down, please. There's your narrative explaining the result. You say: "From the above results the majority of new agents who completed the feedback questionnaire feel that they have received sufficient training to enable them to process transactions and prepare the office balance."
2 3 4 5 6 7 8 9 10	Q. A .	that we thought we were probably on the right track, you know, what we were providing was sufficient for you know, it was a good response, I think, really. Again, why would that be taken as a good measure of success? I suppose because it wasn't the other way round, that it wasn't 22 per cent said they were you know, they had sufficient training. And then question 6, please: "In which area of the Post Office operation do you	2 3 4 5 6 7 8 9 10	A. Q. A.	Yes. If we go to page 5. We did what our response was to feedback. Scroll down, please. There's your narrative explaining the result. You say: "From the above results the majority of new agents who completed the feedback questionnaire feel that they have received sufficient training to enable them to process transactions and prepare the office balance." That of course is statistically correct because
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. A .	that we thought we were probably on the right track, you know, what we were providing was sufficient for you know, it was a good response, I think, really. Again, why would that be taken as a good measure of success? I suppose because it wasn't the other way round, that it wasn't 22 per cent said they were you know, they had sufficient training. And then question 6, please: "In which area of the Post Office operation do you feel least confident and why?" It seems that people didn't include a why answer. 17 per cent felt least confident in balancing. Then question 8, at the foot of the page: "Are there any areas where you feel you need more training or support?" 18 per cent felt they needed more training in balancing and the trading period.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Q. A. Q. A. Q. A.	Yes. If we go to page 5. We did what our response was to feedback. Scroll down, please. There's your narrative explaining the result. You say: "From the above results the majority of new agents who completed the feedback questionnaire feel that they have received sufficient training to enable them to process transactions and prepare the office balance." That of course is statistically correct because a majority did, more than 50 per cent did. Yes. But can you remember why the 72 per cent figure was not seen as a concern? No, I don't. Seen by you as a concern? No, no, I don't recall. Because it's close to a third of individuals not feeling
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. A .	that we thought we were probably on the right track, you know, what we were providing was sufficient for you know, it was a good response, I think, really. Again, why would that be taken as a good measure of success? I suppose because it wasn't the other way round, that it wasn't 22 per cent said they were you know, they had sufficient training. And then question 6, please: "In which area of the Post Office operation do you feel least confident and why?" It seems that people didn't include a why answer. 17 per cent felt least confident in balancing. Then question 8, at the foot of the page: "Are there any areas where you feel you need more training or support?" 18 per cent felt they needed more training in balancing and the trading period. Can you help us as to whether anything was taken	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Q. A. Q. A. Q. A.	Yes. If we go to page 5. We did what our response was to feedback. Scroll down, please. There's your narrative explaining the result. You say: "From the above results the majority of new agents who completed the feedback questionnaire feel that they have received sufficient training to enable them to process transactions and prepare the office balance." That of course is statistically correct because a majority did, more than 50 per cent did. Yes. But can you remember why the 72 per cent figure was not seen as a concern? No, I don't. Seen by you as a concern? No, no, I don't recall. Because it's close to a third of individuals not feeling they've received sufficient training to enable them to
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A .	that we thought we were probably on the right track, you know, what we were providing was sufficient for you know, it was a good response, I think, really. Again, why would that be taken as a good measure of success? I suppose because it wasn't the other way round, that it wasn't 22 per cent said they were you know, they had sufficient training. And then question 6, please: "In which area of the Post Office operation do you feel least confident and why?" It seems that people didn't include a why answer. 17 per cent felt least confident in balancing. Then question 8, at the foot of the page: "Are there any areas where you feel you need more training or support?" 18 per cent felt they needed more training in balancing and the trading period.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q. A. Q. A. Q.	Yes. If we go to page 5. We did what our response was to feedback. Scroll down, please. There's your narrative explaining the result. You say: "From the above results the majority of new agents who completed the feedback questionnaire feel that they have received sufficient training to enable them to process transactions and prepare the office balance." That of course is statistically correct because a majority did, more than 50 per cent did. Yes. But can you remember why the 72 per cent figure was not seen as a concern? No, I don't. Seen by you as a concern? No, no, I don't recall. Because it's close to a third of individuals not feeling they've received sufficient training to enable them to prepare transactions and prepare an office balance.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. A .	that we thought we were probably on the right track, you know, what we were providing was sufficient for you know, it was a good response, I think, really. Again, why would that be taken as a good measure of success? I suppose because it wasn't the other way round, that it wasn't 22 per cent said they were you know, they had sufficient training. And then question 6, please: "In which area of the Post Office operation do you feel least confident and why?" It seems that people didn't include a why answer. 17 per cent felt least confident in balancing. Then question 8, at the foot of the page: "Are there any areas where you feel you need more training or support?" 18 per cent felt they needed more training in balancing and the trading period. Can you help us as to whether anything was taken from this customer feedback, that there was a significant minority of individuals who felt that the training they had received on balancing was inadequate	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Q. A. Q. A. Q. A. Q.	Yes. If we go to page 5. We did what our response was to feedback. Scroll down, please. There's your narrative explaining the result. You say: "From the above results the majority of new agents who completed the feedback questionnaire feel that they have received sufficient training to enable them to process transactions and prepare the office balance." That of course is statistically correct because a majority did, more than 50 per cent did. Yes. But can you remember why the 72 per cent figure was not seen as a concern? No, I don't. Seen by you as a concern? No, no, I don't recall. Because it's close to a third of individuals not feeling they've received sufficient training to enable them to prepare transactions and prepare an office balance. I think no, I don't know. At the foot of the page:

4		thou peopled further training or current 10 per cent	1		Can you recall whather this was assoluted within
1 2		they needed further training or support 18 per cent	1 2		Can you recall whether this was escalated within the Post Office or not?
3		replied that they required further [over the page, please] training in the weekly and TP balances."	3	Α.	No, I can't.
4		Can you remember what was done as a result of	4		Who would this report have gone to?
5		that?	5	Α.	This one? My line manager.
6	Δ	Well, only from what it says here:	6	Q.	Who was?
7	Α.	"As part of the new training offered the agent	7	Α.	I think it would have been Sue Richardson.
8		receives coaching on (read sotto voce) they are	8	Q.	Still at April 2011?
9		assessed on the quality of their conversations."	9	Α.	Possibly, and I don't know where else it would have
10		That doesn't relate to that, does it?	10	,	gone.
11	O.	No. I can't see anything that relates to the balancing	11	O.	Were you aware of the things that I've just mentioned,
12	Ψ.	issue that has been pulled up from	12	Φ.	that concerns had been consistently expressed by
13	Α.	I'm sorry, no, I don't know then. Sorry.	13		subpostmasters and others in testing acceptance and
14		We've heard some evidence in the Inquiry that, in the	14		rollout over balancing?
15		testing stage of Horizon in the late '90s, in the	15	A.	No.
16		acceptance phase of Horizon, when Horizon was being	16		So for you this was just a standalone analysis of 88
17		tested against some contractual provisions to determine	17		responses to a request for feedback?
18		whether the Post Office should agree that the project	18	A.	Yes.
19		could proceed further to national rollout, and in the	19	Q.	Thank you. Then turning to the end of your time in the
20		course of national rollout concerns were expressed by	20		Post Office, please, can we look at POL00088953.
21		subpostmasters about the balancing process, and here	21		I think we can see you are a recipient of this
22		a decade on there is a significant minority of people	22		email in January 2015 from Simon Drinkwater. You're
23		saying that they have issues or concerns with the	23		second in the distribution list.
24		balancing process. It's one of the top concerns of	24	A.	Yes.
25		those that expressed a view.	25	Q.	So this is a year or so before you take redundancy?
		85			86
1	Δ	Yes.	1	0	So her title and role would be?
2		Mr Drinkwater, if we just scroll down a little bit, we	2		I can't remember her title at the time.
3	Ψ.	can see he was part of business transformation. Do you	3	Q.	
4		remember him?	4		I think it was projects, something projects manager.
5	Α.	Yes.	5		I can't remember exactly the title. Her role well,
6	Q.	Can you remember what role he performed in business	6		no, I don't remember. I should remember, but sorry.
7		transformation?	7	Q.	Jackie Newton?
8	Α.	No.	8	Α.	She was training, something to do with training, but
9	Q.	He says:	9		I can't remember her full role.
10		"Hi everyone. Natalie Liff"	10	Q.	Angela van den Bogerd?
11		Is that field support adviser again?	11	A.	Higher up but I don't know exactly her role.
12	A.	Yes.	12	Q.	Craig Tuthill?
13	Q.	" has worked on producing a quick guide to balancing	13	A.	I know the name I can't remember his title and role.
14		for postmasters who have a loss or gain. See attached.	14	Q.	Ann Allaker?
15		This has been produced because there doesn't seem to be	15	A.	I'm not going to be very helpful here, sorry.
16		a clear process to follow in the event of a misbalance."	16	Q.	Cutting things short, for the remainder of the people on
17		Do you know why it was that, 15 years after the	17		the To list, is there anyone you recognise and the job
18		introduction of Horizon, there wasn't a clear process to	18		that they did?
19		follow in the event of a misbalance?	19	A.	I recognise my husband's name Drew McBride and his role
20	A.	No, I don't.	20		at the time. I can't recall actually exactly the title.
21	Q.	If we look at the top of the page, please, and look at	21		He was head of something. I should know that. Sorry,
22		the distribution list there, could you talk us through,	22		Drew.
23		if you know, what role those people were performing at	23		Then there's Natalie Liff, who was the FSA who
24		this time. So Sue Richardson?	24		produced the handout. Chris Gilding
25	A.	She was my line manager.	25	Q.	We know.
		87			88

1	Α.	Yes.	1	A. From reading it, it looks straightforward enough to me,
2	Q.	And Tim Gordon Pounder?	2	but I don't have enough Horizon experience to know
3	A.	He's FSA similar to Natalie.	3	whether in practical terms that would have been an easy
4	Q.	Of the people mentioned in that distribution and copy	4	guide to follow.
5		list, did any of them have responsibility for or	5	MR BEER: Thank you. Those are the only questions that
6		connections to investigations?	6	I ask, Mrs McBride. There may be some questions from
7	Α.	I don't know. I don't think so, but I don't know.	7	others starting no? No, thank you very much. Those
8	Q.	We've seen that the email says that there doesn't seem	8	are all of the questions that you are to be asked.
9		to be a clear process to follow in the event of	9	Thank you.
10		a misbalance, and then a series of questions are asked	10	A. Thank you.
11		by reference to the document that's attached a quick	11	SIR WYN WILLIAMS: Well, Mrs McBride, thank you very much
12		guide to balancing, and four questions are asked.	12	for coming to the Inquiry and for answering a good deal
13		Can you recall whether you answered them?	13	of questions this morning. I'm grateful to you. Thanks
14	A.	No, I don't recall.	14	again.
15	Q.	You can't recall whether you answered any of these	15	A. You're welcome. Thank you.
16		questions or not?	16	MR BEER: Sir, we're not sitting this afternoon or, tomorrow
17	A.	I think I would have done. If we were asked to respond,	17	and so the Inquiry reconvenes at 10 am on Thursday.
18		then I would have responded. But I don't recall what	18	SIR WYN WILLIAMS: Fine, all right. Thank you very much.
19		I said.	19	See you then. Goodbye.
20	Q.	If we go over the page, please, I think this is the	20	MR BEER: Thank you, sir.
21		document that was described as the quick and easy guide	21	(12.45 pm)
22		to balancing. Can you recall whether you regarded this	22	(Adjourned until Thursday, 19 January at 10.00 am)
23		as a quick and easy or clear and easy process to follow	23	
24		for a subpostmaster to reconcile his or her cash and	24	
25		stock on Horizon as at 2015?	25	
		89		90
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2		SANDRA LOUISE McBRIDE(affirmed)		
3		Questioned by MR BEER 1		
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