

Thursday, 19 January 2023

1
2 (10.00 am)
3 **MS KENNEDY:** Good morning, Chair.
4 **SIR WYN WILLIAMS:** Good morning.
5 **MS KENNEDY:** Our first witness today and only witness today
6 is Mr Donald Grey.
7 **SIR WYN WILLIAMS:** Good morning, Mr Grey.
8 **THE WITNESS:** Good morning, sir.
9 **DONALD SCOTT GREY (sworn)**
10 **Questioned by MS KENNEDY**
11 Q. Could you confirm your full name, please.
12 A. Yes. Donald Scott Grey.
13 Q. Mr Grey, do you have a copy of your witness statement in
14 front of you?
15 A. I do, yes.
16 Q. If you turn to page 25 of that statement, is that your
17 signature there?
18 A. Actually it's page 24 on my copy.
19 Q. You are quite right. Is that your signature there?
20 A. It is, yes.
21 Q. Have you read through this statement recently?
22 A. Yes.
23 Q. And is it true to the best of your knowledge and belief?
24 A. Indeed.
25 Q. That statement is now in evidence. Everything that

1

1 A. It was very much a business-as-usual role in many
2 respects. This was a slightly different take on what we
3 were normally doing in post offices. But clearly there
4 were issues that we had to monitor there to make sure
5 that we were supporting the team in actually rolling out
6 Horizon and learning from the opportunity that this
7 trial gave us.
8 Q. Did you feel that it was a positive, negative experience
9 or neutral?
10 A. I think it was mixed. I think there was general
11 acceptance that it was an opportunity to modernise the
12 business, but it didn't come without its problems.
13 Q. Is that the feedback that you were receiving from
14 subpostmasters at that time?
15 A. Yes, indeed. Yes, it was fairly positive but there were
16 some things that really needed to change to make things
17 better.
18 Q. In summer 1999 you undertook a project to improve the
19 efficiency of the branch office network; is that right?
20 A. That's right. That lasted for a few months, yes.
21 Q. What did that involve?
22 A. It was really working with the unions to try and find
23 a way of reducing the costs that the branch office
24 network was incurring for the business.
25 Q. In January 2000 you were appointed as Horizon National

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1 I ask you is supplementary. First, thank you very much
2 for preparing a witness statement and for coming to give
3 evidence today. I'm going to start by asking you a few
4 questions about your background. You joined the
5 Post Office in 1963 as an executive officer; is that
6 right?
7 A. Yes.
8 Q. From 1986 to June 1993 you were district manager for the
9 Post Office; is that right?
10 A. Yes, that's right.
11 Q. What did that role involve?
12 A. That was looking after post offices across four counties
13 in the north Midlands. I can't remember how many there
14 were at the time, must have been about 300.
15 Q. In June 1993 you moved to Leeds on business
16 reorganisation and you became regional general manager
17 for the North-east region; is that right?
18 A. Yes. That was later. I did another role before
19 I became regional manager. That was in 1997.
20 Q. You're quite right. Then as part of your time in that
21 position you were involved in a live trial on Horizon;
22 is that correct?
23 A. Yes. Some of my officers were actually involved in the
24 early part of Horizon but not right at the outset.
25 Q. What was your experience of that like?

2

1 Roll Out Project Manager. Can you tell us a bit about
2 that role?
3 A. Well, in that particular role I was not responsible for
4 the whole of the Horizon project but just for the
5 preparation, the training and the installation across
6 the network. Others were responsible for the live
7 environment, contract management, software acceptance
8 and business assurance and other aspects.
9 Q. Then in July 2001 you moved to lead the Business Service
10 Management function; is that right?
11 A. Yes, that's when the Horizon national rollout project
12 had effectively finished.
13 Q. What did that role involve?
14 A. That was lead on the provision of supplies and support
15 to the Post Office network, and it included supply
16 management of internal Post Office partners, such as
17 Cashco stores and customer management, as well as the
18 ICL Horizon Helpdesk.
19 Q. You then retired in March 2003; is that right?
20 A. Yes. It's the best job I've ever had.
21 Q. When you took over, going back to the role of Horizon
22 National Roll Out Project Manager, did you have
23 a handover from David Miller and his team?
24 A. Not that I recall. I did have quite a lot of
25 discussions with people who were involved in the project

4

1 directly at that point in time, but I don't recall any
 2 direct discussion with Dave Miller himself.
 3 Q. What did those discussions involve?
 4 A. It was really an update on what the situation was to
 5 date, because I had been out of the scene as far as
 6 Horizon was concerned for a few months and, of course,
 7 there was a lot happening at that point in time before
 8 the system had been accepted and national rollout could
 9 continue.
 10 Q. Were you ever made aware of the project mentors' report?
 11 A. Sorry, the what?
 12 Q. Project mentors' report. Have you ever heard of it?
 13 A. It doesn't ring any bells, sorry.
 14 Q. When you took over in January 2000, were you aware of
 15 any problems with EPOSS or the Electronic Point of Sale?
 16 A. Not directly. I knew there were certain Acceptance
 17 Incidents that had been the subject of discussion
 18 between the Post Office and ICL but not specifically
 19 about EPOSS.
 20 Q. If we could turn up the first document, please. That's
 21 POL00090457 -- it should come up on your screen in a
 22 moment -- we can see here that this is an email and
 23 you're on the distribution list. I think you're halfway
 24 down. This is an email from Jonathan Rogers and if we
 25 turn over to page 3, we can see that this is a BSM -- so

1 "As you know, we have been going through the
 2 acceptance process for Horizon, while ICL work on some
 3 technical issues that emerged during the trial. I am
 4 pleased to say progress has been made on these issues
 5 and, as a result, we have now been able to agree to
 6 installing the equipment in a further 336 offices from
 7 20 September, on top of the 150 offices we had already
 8 agreed to. This will bring the total number of offices
 9 in the trial to some 810, and I will update you on
 10 further news as it is available. Please feel free to
 11 communicate this information to your teams if they want
 12 an update on the latest position."
 13 If we scroll down, we can see that you're given
 14 a public line about the reasons for this and if we look
 15 at the 5th bullet point, it says:
 16 "If asked about what the issues are, we are going
 17 through a difficult phase in the Horizon discussions.
 18 As a result it wouldn't be appropriate for us to discuss
 19 the details of the issues publicly, but we are hoping
 20 they will be resolved quickly and we will then be able
 21 to resume offering the service in all Horizon offices."
 22 So at this time again there seems to be a lot of
 23 discussion about issues that have been identified with
 24 the system that you're being copied into.
 25 A. Yes. I think I'd moved off the general manager role at

1 that's a Business Service Management snapshot report.
 2 We can see that this is a report setting out issues with
 3 cash account balances on Wednesday, 21 July from two
 4 live trial outlets. Looking beside the second 9, it
 5 says:
 6 "Offices reported losses and gains three of which
 7 may have been migration errors", and it sets out the
 8 figures of total loss discrepancy and total gain
 9 discrepancy.
 10 Before you took over your role you had received
 11 emails setting out that there were issues with
 12 discrepancies in terms of cash account balancing; is
 13 that right?
 14 A. I don't recall that in fairness, no.
 15 Q. Did you receive a lot of emails like this at the time?
 16 A. I can't recall a number, but it was quite common that we
 17 were kept in the loop about things that were happening.
 18 Q. That document can come down, please.
 19 If we could turn up POL00028463, this is another
 20 email from September 1999 -- so again before you took
 21 over as the project manager -- and we can again see your
 22 name midway through the distribution list. It's an
 23 email from, I think, Keith Hardie which we can see if we
 24 turn over to page 2 and looking at that first paragraph.
 25 It says:

1 that point, and I was actually doing the branch office
 2 efficiency project. So although I was copied into that
 3 particular email, it wasn't of great relevance to me at
 4 that point in time.
 5 Q. So did you find that you were being copied in on things
 6 that didn't specifically require your attention at this
 7 time?
 8 A. I can't recall, but it wouldn't surprise me.
 9 Q. Turning forward then to when you take over the role of
 10 the project manager in January 2000, if we can turn up
 11 NFSP00000261, and if we could turn to page 7. This is
 12 the Christmas Horizon Research Report which we've turned
 13 to a number of times in this Inquiry. It was written by
 14 Lorna Green in January 2000. So this is right that time
 15 you take over in this role, isn't it?
 16 A. That's right, yes.
 17 Q. If we turn to page 9, this gives the results of the
 18 telephone interviews. As it sets out in the
 19 introduction:
 20 "This report gives the results of 330 telephone
 21 interviews with staff and agents whose offices have
 22 taken part in the Horizon roll out in the autumn of
 23 1999. In these interviews they were asked their opinion
 24 on different aspects of the Horizon System, and various
 25 types of support available (including manuals and

1 Helpdesks) and their overall satisfaction with the
2 automation programme."
3 Under Results and Conclusions, it says:
4 "Results on almost all aspects of Horizon are
5 mixed. Some staff and subpostmasters are getting to
6 grips with the system and are happy and satisfied while
7 others are struggling and continuously having problems.
8 There are no obvious pattern by office type, IP area,
9 number of counter positions or the length of time since
10 migration.
11 "However where comparisons have been possible,
12 these results are more favourable than the results from
13 the live trial ... last June."
14 Looking at the next paragraph, it says:
15 "The main message coming through is that they are
16 not getting enough training. They are mainly happy with
17 what the one-and-a-half days they received, but the
18 training on balancing is not long enough for their
19 needs."
20 Scrolling down to the bottom of that page, it
21 says:
22 "The other area for concern is Helpdesks. There
23 is confusion over which number to call, which is
24 compounded by them being passed back and forth between
25 Helpdesks. There is a problem getting through to the

9

1 aware of prior to its commission?
2 **A.** I suspect there may have been, but this report was
3 really good background information. It gives
4 a benchmark on which to build and to actually identify
5 any issues that were current and needed attention, and
6 there were a number of actions which ensued from this
7 report to actually improve things for everyone.
8 **Q.** Turning to page 15, we can see the results of training
9 there. It says:
10 "Opinion was split on the training with
11 50 per cent saying that the training was good and
12 50 per cent saying it was poor. This was similar to the
13 results from the live trial research except that this
14 time there are more respondents in the very poor
15 category."
16 So this is really quite concerning, isn't it, the
17 feedback that you were getting about training at this
18 stage?
19 **A.** It was and, as a consequence, there were a number of
20 steps that were taken to improve the situation.
21 **Q.** Turning over to page 16 and scrolling down, looking at
22 Balancing, it says:
23 "Nearly a fifth of respondents are finding
24 balancing using Horizon very difficult and a further
25 quarter, 24 per cent, are finding it fairly difficult."

11

1 Horizon system Helpdesk in particular and the service
2 from both appears to be lacking in terms of consistency
3 and ... knowledge."
4 So there were big issues from the very beginning
5 of your tenure about training and the Helpdesk; is that
6 right?
7 **A.** Yes, yes, and it's perhaps not surprising that these
8 situations happened because everybody was learning at
9 the same time as we introduced Horizon into the
10 business.
11 **Q.** If we turn to page 13 of that report, the objectives of
12 the report are set out and the objectives of the
13 research. It says:
14 "The objective of the research was to evaluate how
15 these 1856 offices have found the Horizon System, in
16 order to identify any potential problems before national
17 roll out commences. The major aspects of Horizon were
18 to be covered, including the various types of support
19 available."
20 Did you understand or did you speak to anyone
21 before this report was commissioned?
22 **A.** No, because it had been commissioned and completed
23 before I actually joined the project.
24 **Q.** Did you know anything about why this research was done?
25 Were there any particular concerns that people were

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1 So balancing again there's a is a big problem,
2 isn't it?
3 **A.** Yes.
4 **Q.** Turning to page 20 -- it might be helpful to go back
5 over the page to page 19 -- and scrolling down, please,
6 this is to do with Helpdesks. It records there's some
7 confusion over which Helpdesk to call which has
8 deteriorated since the live trial. Back over to
9 page 20, it seems 59 per cent are satisfied with the
10 Helpdesk to some extent.
11 So again this is quite negative feedback, isn't
12 it?
13 **A.** It was and it perhaps supported the fact that one of the
14 Acceptance Incidents that was being debated before
15 I joined the project was related to the performance of
16 the Horizon System Helpdesk.
17 **Q.** Turning to page 26, please, and scrolling down, it
18 summarises the conclusions:
19 "Results on almost all aspects of Horizon are
20 mixed. Some staff and subpostmasters getting to grips
21 with the system are happy and satisfied but others are
22 struggling and continuously having problems."
23 Again, the third paragraph, the main message is
24 coming through that they are not getting enough
25 training.

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1 So when you got this report, what did you decide
2 to do in light of it?

3 **A.** Well, some steps had already been taken. For example,
4 in the second supplementary agreement, there'd been
5 a move to increase the training by providing
6 a user-awareness event, some two to four weeks before
7 they actually went through training itself. This was to
8 really introduce learning as a process rather than as an
9 event, and it became a gradual introduction to Horizon.
10 Beyond that, there were improvements made in the
11 balancing process. We diverted more staff to actually
12 supporting offices during the rollout period and in the
13 weeks thereafter, and we introduced a balancing guide as
14 well which, again, was another tool to actually making
15 balancing easier for them.

16 As a consequence, we actually took the score from
17 what was 19 per cent on ease of balancing in the live
18 trial right up to 90 per cent within 12 months.

19 **Q.** If we could turn to the next document, please, which is
20 POL00028441, this is an email from the author of the
21 report and we can see in the second paragraph of her
22 email, she says:

23 "I strongly recommend that you take time to browse
24 through the staff and subpostmasters' own words as it
25 provides insight into their strength of feeling about

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1 was now an agreed way forward and that robust checks had
2 been in place to address the original concerns. However
3 there were still further checks to be completed by TIP
4 on the deployment of the integrity control. Further
5 work also needed to be done between Horizon Commercial
6 and ICL Pathway on reaching contractual agreement on the
7 third supplemental agreement."

8 So there you are being made aware of the issues
9 with the system and potential data integrity issues,
10 aren't you?

11 **A.** Yes.

12 **Q.** At this --

13 **A.** We had those before as well, because they had been part
14 of the communications that I'd received when I was in
15 the regional general manager post.

16 **Q.** So, when you were deciding what to do in relation to
17 training, especially in respect of balancing, did you
18 ever think: well, hold on a second, maybe there's
19 something going wrong with the system rather than
20 subpostmasters not being able to balance properly?

21 **A.** In fairness, it wasn't my role to engage with that
22 particular problem. This was a business assurance
23 problem and it was for others to track that and identify
24 it.

25 **Q.** So --

15

1 various aspects of Horizon."

2 Was that message heard by you and other people in
3 the Post Office?

4 **A.** Absolutely. I mean, we didn't go around with our eyes
5 and ears shut. We were very alert to feedback like this
6 because it was so important to us in trying to get
7 things right.

8 **Q.** Turning to 20 January 2000, if we could pick up
9 POL00028509, this is an email from 20 January. This was
10 shortly after you started in the post; is that right?

11 **A.** That's right, it is.

12 **Q.** And we can see you're on the distribution list and this
13 is from a Dick Brazeal. Then if we can turn over the
14 page, these are the notes of a Horizon Pathway delivery
15 meeting on 14 January and, if we can scroll down,
16 please, it says at paragraph 2:

17 "Dave Smith summarised the key areas which were at
18 issue for the continuation of roll out on 24 January.
19 These were: the rectification of outstanding data
20 integrity weaknesses, AI 376/3; the clarification and
21 resolution of weaknesses in Helpdesk performance, AI
22 408/3; the resolution of issues with the management of
23 reference data, and the satisfactory deployment and
24 operation of integrity control.

25 "He identified that for each of these areas there

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1 **A.** Clearly we had to know about it because we didn't want
2 to be rolling out a defective system, and at no time did
3 we think we were doing so.

4 **Q.** But you didn't feel it was your role to escalate
5 concerns; that was for someone else?

6 **A.** No, because I didn't see those concerns directly. So,
7 as I say, it was for others to pursue those.

8 **Q.** That document can come down now.

9 If we could turn up NFSP00000348, please, this is
10 a letter to the NFSP, the head of the NFSP, Mr Colin
11 Baker, on 1 February 2000, so again shortly after you
12 took up the role. How did you find working with Colin
13 Baker of the NFSP?

14 **A.** Fine. I had absolutely no problem. We knew each other
15 in the past and we were both very positive about what we
16 were trying to do. Colin was very forthright, like so
17 many others in the Federation of Subpostmasters, but we
18 were always constructive in the way that we tried to
19 resolve things.

20 **Q.** Did you find dealing with the NFSP helpful?

21 **A.** Indeed. I mean, we couldn't have done this project
22 without their involvement.

23 **Q.** If we could look, turning back to the document, if we
24 could scroll down to the second paragraph, it says:

25 "Since we paused roll out in November we have

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1 taken a number of improvements to build on past
2 experiences and provide the robust arrangements we would
3 all like to see to support a programme of around 300
4 outlets a week coming on stream. I note that Dave Smith
5 has outlined most of these in his letter on 31 January,
6 so I will not repeat here. Suffice to say, if you need
7 more detail on any of these, please let me know.

8 "Hopefully these improvements will have an
9 evidenced beneficial effect and tackle the problems
10 identified in the pre-Christmas research that was done
11 via 335 telephone interviews with staff and agents who
12 were involved in Horizon roll out during last autumn."

13 Picking it further down the paragraph:

14 "The research also showed [this is the fourth line
15 from the bottom] that many more would like more training
16 and balancing is still difficult for too many.

17 Certainly we will need to continue to monitor the
18 position as we go through the programme and respond to
19 prevailing requirements as appropriate."

20 Turning over the page and scrolling down, we can
21 see that there are a number of issues raised about the
22 Helpdesk, and then there are a number of specific issues
23 that have previously been raised by the NFSP; is that
24 right? You can see those at (a) to (e).

25 A. Yes.

17

1 Q. Actually, if we just read what this is about, it says:

2 "The losses at this office were discussed at
3 a review and authorised under our normal procedure for
4 dealing with eight-week requests. From memory two of
5 the losses totalling about 1,100 were known to be
6 awaiting an error notice, and authority to hold these
7 beyond 8 weeks was given. The large loss for about
8 £3,000 was the subject of frequent discussions with the
9 subpostmaster who could not accept that this was
10 a genuine error and not down to Horizon."

11 Then picking it up again on the final paragraph,
12 it says:

13 "It is debatable as to whether this was due to
14 operator error or a glitch in the system. There is no
15 evidence either way. The net result is that most of
16 this large loss was accounted for."

17 Why was Mike Ingle bringing this to you?

18 A. I suspect he was responding to an invitation which
19 I issued to everybody that I dealt with, to actually
20 flag up any issues that were of concern to them. There
21 was a recognised route for doing so via the Business
22 Service Management team, but I was also interested in
23 knowing if there were any issues out there. So anything
24 I could do to encourage feedback I did so.

25 Q. You said a moment ago that you were nothing to do with

19

1 Q. Did you feel at this time when you first took over the
2 role the NFSP were raising a lot of problems with the
3 system with you?

4 A. They were raising a lot of problems with rollout rather
5 than the system as such, in fairness.

6 Q. What problems were they raising about rollout? Are they
7 recorded here?

8 A. Well, for example, item (b) there is about training and
9 that was about scheduling of training, I suspect.

10 Q. Rather than the quality of the training itself?

11 A. At that point, yes.

12 Q. Did anyone at the NFSP ever raise any data integrity
13 issues with you?

14 A. Not that I recall, no, because that would have been
15 proper to have dealt with Business Service Management on
16 that one, or transaction processing.

17 Q. That document can come down, please.

18 Turning forward slightly, if we could turn up NFSP
19 00000287 and if we could -- thank you. We've got an
20 email from a Mike Ingle on 3 February 2000 to you and
21 this concerns losses at Waterloo Road. Who was Mike
22 Ingle?

23 A. Mike Ingle was the retail network manager in the Leeds
24 cluster, and he worked for me when I was regional
25 general manager in the north-east.

18

1 the system itself. So why were you taking issues or,
2 you know, hearing feedback in relation to the system?
3 Did you not clearly delineate those with the people you
4 were speaking to?

5 A. I was happy for them to come to me, but I always made
6 sure that they were fed into service management so that
7 they could process them in the normal way of things. It
8 certainly was important that we encouraged people to
9 tell us whenever there were suspected issues out there.

10 Q. Do you remember receiving this email?

11 A. I don't remember it, to be -- in fairness, because,
12 I mean, I must have received a number at the time and it
13 is a long time ago. But it struck a chord when I read
14 it.

15 Q. Do you remember receiving any other emails like this?

16 A. Oh, I'm sure I did, but I couldn't begin to tell you
17 what they were at this point in time.

18 Q. Are there emails about the integrity of the system as
19 opposed to the performance of rollout? Do you think
20 there may have been others?

21 A. There may have been others. As regards what the subject
22 was, I don't know. The important thing was that we
23 wanted people to share with us any concerns they had,
24 whether it was rollout, whether it was system issues or
25 whatever, because we wanted to get this thing right.

20

1 The integrity of the business really depended on us
 2 doing so.

3 Q. I appreciate you can't remember, but what do you think
 4 you would have done with an email like this?

5 A. With an email like this, I would have probably passed it
 6 to one of my team to follow through, one, to make sure
 7 it was on the Business Service Management radar and was
 8 being followed to solution and, secondly, to make sure
 9 that there was sort of some feedback down the line as
 10 well. But the important thing was that we had processes
 11 in place which were actually there, designed to actually
 12 tackle problems like this whenever they were flagged up
 13 to us.

14 Q. Moving forward to May 2000, if we could turn up
 15 FUJ00075726, this is a diary note of the National
 16 Federation of Subpostmasters Annual Conference. Did you
 17 attend many events with the NFSP?

18 A. Yes, I did do. I mean, not necessarily on a national
 19 scale but perhaps on a more local scale. I think this
 20 was probably the only time I spoke to their national
 21 conference.

22 Q. Were you the person of contact in relation to the
 23 Horizon rollout at Post Office for the NFSP at this
 24 time?

25 A. It seemed to be so, yes, yes. I mean, they were
 21

1 and subpostmasters.

2 Q. What was the atmosphere like in your mind at this
 3 meeting?

4 A. Well, we started off on a fairly jovial note, and there
 5 were some hard-hitting questions as well. I mean, it
 6 was quite a relaxed sort of session but, at the same
 7 point in time, some very serious business went on.

8 Q. We can see in bullet point form the presentation that
 9 you gave there on the page and, if we turn over, we can
 10 see "Training", and under Training you:
 11 "Reported that postmasters wish to extend managers
 12 course to the two days. However, Post Office believe
 13 this is not the case. For Don [that's you] having
 14 spoken to postmasters personally during site visits and
 15 even the night before, no-one could state why they
 16 needed the extra time."
 17 Do you remember saying words to that effect?

18 A. Well, not entirely, no, but what I would point out --
 19 that this is a Fujitsu or ICL version of what I actually
 20 said. It would be far more accurate to actually have
 21 a look at what I said to the conference, which is the
 22 subject of another paper. I think it's NFSP 00000436
 23 from memory.

24 Q. But sticking with your memory -- we may turn that up in
 25 due course -- did you feel like subpostmasters were
 23

1 encouraged to speak to others in the team and not just
 2 to me. It wasn't a one-man band by any means, and I had
 3 four regional teams across the country, so there was
 4 many contacts at regional level between the Federation
 5 and my team.

6 Q. Then would those teams then feed back any issues to you?
 7 Would they kind of filter up to you as the head of it?

8 A. Sure, if they were relevant to do so. Some of them
 9 perhaps could have been sorted out at their level.

10 Q. Turning back to the document, if we could turn over to
 11 page 2 and scrolling down, and down again, we can see
 12 that you gave a presentation at this meeting. Do you
 13 remember that presentation?

14 A. To be honest with you, I'd forgotten all about the event
 15 altogether until Alan Johnson gave his testimony a few
 16 weeks ago, but I have seen the transcript of the speech
 17 I gave which is the subject of another paper that you
 18 sent me.

19 Q. What can you tell us about this presentation? What was
 20 the purpose of giving it?

21 A. The purpose was to give an update on where we were, to
 22 give some positive messages, to recognise that there
 23 were problems, and to assure them that we were actually
 24 dealing with them, but to put it in the context of how
 25 important Horizon was for the benefit of the business
 22

1 asking for extra time and that this was unnecessary?

2 A. No, I didn't. No, I mean, I understood the concerns,
 3 and we addressed those concerns in what we'd actually
 4 put in place earlier in that year.

5 Q. Turning down to the bottom of the page, you mentioned
 6 some of the serious issues that were being raised, and
 7 we can see here on the Q and A session, it says:
 8 "When Leeds and Wakefield went live, 44 outlets,
 9 they were all promised support officers. 17 did not
 10 show, which caused major problems in the first week of
 11 balancing. Why offer or promise something and then not
 12 delivery?"
 13 Then number 2:
 14 "Mid-Glamorgan is due to go live in June. Two
 15 points for reference. Phone call regarding training
 16 received before letter, and how to write four letters
 17 before receiving confirmation about installation date.
 18 Fault is bad communication."
 19 Third, two points:
 20 "Helpdesk don't know the answer to questions when
 21 the phone is answered, which is not very often, usually
 22 just rings and rings, and management of training is
 23 appalling. Trainers know nothing about running a post
 24 office."
 25 Turning over the page, we can see some further
 24

1 issues there. How confident did you feel with dealing
 2 with some of these concerns that were raised?
 3 **A.** Well, I didn't duck any of them. Clearly I didn't know
 4 all the detail as well as those who were raising the
 5 issues, but it wasn't surprising that there were
 6 problems across the project given the scale of it, and
 7 I'm not surprised that some of these things happened.
 8 **Q.** Turning forward again slightly in time to 18 May 2000,
 9 NFSP --
 10 **SIR WYN WILLIAMS:** Before we do that, could you just remind
 11 me whose diary note is this?
 12 **MS KENNEDY:** This diary note is from Fujitsu. We can find
 13 that out.
 14 **SIR WYN WILLIAMS:** Yes. I'd like to know who it was exactly
 15 who made this diary note if I could.
 16 **MS KENNEDY:** Yes. We'll find that out. Thank you, sir.
 17 Moving on to NFSP 00000332, in this email you're
 18 copied into an email about polling problems. Do you
 19 remember what polling problems were?
 20 **A.** Indeed, yes. These were problems when the ICL server
 21 couldn't in fact collect information from the Riposte
 22 message store in outlets for it to be then processed by
 23 back-end systems and client systems.
 24 **Q.** How concerned were you about this as a problem?
 25 **A.** I was concerned about it, and it was the subject of
 25

1 These incidents would be then passed to the Business
 2 Service Management team who looked after service
 3 management issues for them to pursue to a conclusion.
 4 **Q.** If we could take that document down, please.
 5 During that year of 2000, there was also the
 6 development of a software update of the CSR+ release.
 7 Could you tell us about that software release, please.
 8 **A.** This is the first major release since I joined the
 9 project, and it was designed to improve functionality on
 10 a number of matters, for example, smartcards, Quantum
 11 gas, links with a logistic (*unclear*) service and a
 12 number of other things, but it also importantly actually
 13 reduced the rollover time between cash accounts where
 14 was a big thorn in the side of postmasters.
 15 **Q.** Did you feel like the release was being rolled out or
 16 developed quite soon after the project itself was rolled
 17 out? Did you have any concerns about how quickly it was
 18 being introduced?
 19 **A.** Not really, no. I was more concerned about doing it
 20 alongside rollout and also to ensure that it was done
 21 properly as well. There was quite a bit of information
 22 that had to be digested by subpostmasters, and that was
 23 the subject of some training breaks and workbooks.
 24 **Q.** If we could turn up NFSP00000301, please, this is
 25 a letter that you wrote to the NFSP on 3 August 2000,
 27

1 discussions that we had with ICL ourselves, even before
 2 this problem manifested itself -- on this occasion that
 3 is. It was a big problem in the sense, particularly
 4 with clients who -- sorry, customers rather who had
 5 actually paid bills and whose record that they'd
 6 actually paid that bill was not then being processed by
 7 the appropriate client.
 8 **Q.** It sets out in this letter what the Federation would
 9 like to see, if we scroll down. Is this an instance of
 10 Colin Baker raising something urgently with you to
 11 investigate?
 12 **A.** No, this wasn't raised with me directly. This was
 13 raised by somebody else.
 14 **Q.** And then copied in to you?
 15 **A.** And then copied in to me, yes.
 16 **Q.** Is this the kind of thing you would have taken forward?
 17 **A.** Absolutely. We couldn't have let this one pass by
 18 because of the significance of it.
 19 **Q.** In this email, it mentions the NBSC. We're coming to
 20 the NBSC but can you explain what that was and what your
 21 view of the NBSC was.
 22 **A.** The NBSC was the call centre that handled calls from
 23 Post Office outlets around transactions and accounting,
 24 and any issue which they identified was something that
 25 constituted a problem they would create an incident on.
 26

1 Scrolling down, and under the first heading it says:
 2 "The roll out of Horizon continues to progress
 3 well and is currently ahead of schedule. The
 4 development of our next software release, CSR+, has also
 5 been progressing well against a very stretching plan.
 6 This release extends Horizon to include Smartcard
 7 capability, a link to distribution systems to enable
 8 improved provisioning of cash and stock and significant
 9 upgrades to the infrastructure to improve system
 10 manageability and security.
 11 "A process of reviewing the outputs of testing and
 12 the readiness of both Post Office Network and ICL
 13 Pathway to begin a trial of CSR+ in 300 outlets has just
 14 been concluded. The objective of the process was to
 15 ensure that the software release could be introduced
 16 into the business without compromising our day to day
 17 operations. Now that Horizon is live in more than half
 18 the network, the process is particularly critical."
 19 Did you feel that you were being put under
 20 pressure or there was pressure to roll out this
 21 additional release?
 22 **A.** Well, there was obviously pressure of sorts because this
 23 was different to the standard work that we were doing.
 24 So we had to make sure that it was right and rolled out
 25 properly so that there was no compromise to what we were
 28

1 doing.

2 Q. If we scroll down again it says:

3 "ICL have identified a number of outstanding

4 faults related to infrastructure enhancements that could

5 create significant problems in the live environment if

6 CSR+ was introduced without them being fixed. They have

7 advised that the start of the pilot should be postponed.

8 We are fully in agreement with this recommendation."

9 If we could take that document down and move

10 forward to NFSP00000327. So this is a short time later

11 and, scrolling down again, is this usual for there to

12 have been this much correspondence between yourself and

13 the NFSP at this time?

14 A. It was quite appropriate. I can't remember the

15 frequency of how much we were in touch. I mean, we

16 spoke a lot by telephone as well as in person. So it

17 wasn't out the ordinary, but it's quite appropriate to

18 keep people informed of what's happening.

19 Q. Picking it up, it says:

20 "Since writing to you earlier today we have held

21 our meeting with ICL Pathway to review readiness to

22 begin the pilot on the new software release, CSR+.

23 "We have taken the decision to proceed with the

24 date centre migration next weekend subject to

25 confirmation from ICL that they have robust plans in

29

1 to subpostmasters I think is that right?

2 A. I believe so, yes.

3 Q. Did you often write directly to subpostmasters?

4 A. No, no.

5 Q. Was the reason you were writing subpostmasters in this

6 instance because of the big changes that were going to

7 happen and the big requirements of them?

8 A. That's right. It was a very significant development,

9 and we needed everybody to be on board with it.

10 Q. If we scroll down that letter, it says:

11 "As you may be aware, we are shortly to undertake

12 the next Horizon software release known as CSR+. An

13 inherent change in this release is to make improvements

14 in cash remittances for the benefit of the business and

15 users. The enclosed training package is essential

16 reading to prepare you for these changes and explain the

17 link submission the logistic feeder service.

18 "As a subpostmaster or office manager, you must

19 complete the whole workbook in advance of the upgrade

20 being released. You will be advised of your upgrade

21 date during the three weeks prior to the event. Please

22 allow two hours for the workbook activity. Once your

23 office has been upgraded, the workbook contains

24 activities which can be undertaken in training mode to

25 consolidate your learning and you will need to allow

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1 place to fix an intermittent problem around preservation

2 of data when swapping faulty kit out on some

3 multi-position counter terminals, and no new issues

4 emerging in remaining tests next week."

5 Surely it's better to have those safeguards in

6 place first before deciding to continue with the

7 release; would you accept that?

8 A. Yes.

9 Q. Do you feel like this was or this symbolises really the

10 release being pushed through too quickly, or did you

11 feel that this was appropriate?

12 A. No, it wasn't. I mean, there were certain safeguards

13 there that we wanted to ensure before we agreed for it

14 to go ahead, and that's in effect what this is saying.

15 MS KENNEDY: Chair, now may be an appropriate time for a

16 short break.

17 SIR WYN WILLIAMS: Yes, that's fine.

18 MS KENNEDY: 11.00?

19 SIR WYN WILLIAMS: Yes, certainly. Thanks.

20 (10.44 am)

(A short break)

21 (11.00 am)

22 MS KENNEDY: Good morning, Chair.

23 Mr Grey, if we could pick up NFSP00000318, thank

24 you, this is a letter dated 25 August 2000 that you sent

25

30

1 yourself time to practice these."

2 Looking down to the fourth paragraph:

3 "When training consolidation has taken place

4 please complete and return the enclosed free post

5 addressed response card to confirm that all training,

6 including training briefs 27 and 28 which you will

7 receive separately, have been undertaken by all

8 concerned in your office. This is a mandatory

9 requirement to confirm that all post offices are

10 prepared for this change. The completed card must be

11 returned within five working days of your upgrade."

12 So this is a significant change, as you have

13 already said. Did you feel like you were asking a lot

14 of subpostmasters to adapt to this changing computer

15 system?

16 A. No, we didn't think we were asking a lot of them, but it

17 was important that we actually had them properly

18 prepared for the change, and that's the significance of

19 this letter.

20 Q. Did you feel that the Post Office equipped

21 subpostmasters well for this big change?

22 A. Yes. I don't think there was any great feedback to the

23 contrary.

24 Q. How did you ascertain whether or not people felt

25 prepared for this change?

32

1 A. Really by feedback that we actually received by general
 2 means, either through the NBSC Helpdesk or by feedback
 3 on outlet visits and contacts with NFSP reps.
 4 Q. So you didn't decide to conduct another research report
 5 at this time?
 6 A. We did about this point in time, because there was some
 7 the further research done in the autumn of 2000.
 8 Unfortunately I haven't been able to see that research
 9 other than by referencing to other documents, but I'm
 10 not sure that that research was done as a consequence of
 11 the CSR+ release. I think it was probably more just
 12 ongoing work to make sure we were on the right track.
 13 Q. If we could turn forward to 6 September and it's
 14 POL00104602 and if we look that bottom email, this is an
 15 email from you to a group of people including Keith
 16 Baines and it attaches an initial draft of the NRO close
 17 down report.
 18 If we look over the page to page 2, we can see
 19 that this is your kind of draft report. What is this
 20 report and how did it come about?
 21 A. This is an essential part of ending a particular project
 22 to make sure that there's a proper handover to enable
 23 any incomplete work to be conducted by others, and to
 24 make sure that the full requirements of the project have
 25 actually been fulfilled.

1 the project's actions and performance; all involved or
 2 interested parties are aware that the project is to be
 3 closed and resources disbanded."
 4 Scrolling down a bit further, it says:
 5 "The project manager has responsibility for the
 6 process and will maintain a regular dialogue with the
 7 project board to ensure there will be no problems with
 8 its confirmation of the project closure.
 9 "The key criteria to be applied are:
 10 "Have all the elements of the project initiation
 11 document been delivered, subject to any changes that may
 12 have been approved during the project life-cycle?
 13 "Are any deviations from the project initiation
 14 document addressed in the project close-down report?
 15 "Is the project board still prepared to accept the
 16 project closure?
 17 "When appropriate, are any deviations reflected in
 18 the follow-on action recommendations?
 19 "Are the project board satisfied that any
 20 outstanding project issues have been baton passed to
 21 others to pursue?
 22 "Have gaining business units formally agreed to
 23 the transfer of residual responsibilities and signalled
 24 their readiness to accept the work?
 25 "Are the project resources and support services

1 Q. If we turn over to page 5, we can see what you have just
 2 said reflected in the introduction:
 3 "The completion of the national roll out of
 4 Horizon gives us the opportunity to take stock of
 5 achievements and experiences and provide a means of
 6 transferring incomplete activity to other functions.
 7 This process covers the work to wrap up the project,
 8 primarily to prepare input to the project board to
 9 obtain its confirmation that the project may close."
 10 If we scroll down, Outputs, it says:
 11 "The outputs from this paper will be a high-level
 12 plan which will define the steps that the NRO project
 13 board and management team must undertake to formally
 14 close the project."
 15 Under Project Closure, it says:
 16 "To confirm that the project has delivered what
 17 was expected, the NRO project board will be asked to
 18 verify that first the Horizon implementation activity is
 19 complete and meets needs of the business; second, the
 20 satisfactory arrangements exist for the transfer of
 21 residual responsibilities to other business units, all
 22 project issues are closed or transferred to other
 23 functions to follow up [and turning over the page] all
 24 relevant project information is secured and archived or
 25 handed on as applicable to permit any future audit of

1 not being transferred elsewhere no longer required?
 2 "Are there any contractual implications when
 3 decommissioning the project?"
 4 So in your mind was this you setting everything up
 5 so that it can be assessed whether or not the criteria
 6 have been met by the project board?
 7 A. Yes.
 8 Q. Who were on the project board? Who would be evaluating
 9 whether these things had been completed?
 10 A. To be honest, that escapes me now. I just can't recall
 11 that information.
 12 Q. Would it have been someone around your level? Would it
 13 have been a different team?
 14 A. No, I suspect it was probably director level which was
 15 one rung above me on the ladder.
 16 Q. Did you feel at the time that those people would have
 17 been qualified to make those calls?
 18 A. Yes.
 19 Q. Turning forward to 21 September 2000, NFSP00000299, this
 20 is another letter from you to the NFSP. If we look at
 21 the first paragraph it says:
 22 "Thank you for your letter of 15 September about
 23 Horizon installation activity during December. Whilst
 24 I can fully appreciate the sensitivity of this issue
 25 I was surprised by the tone given the discussions we

1 have had in recent weeks."
 2 Was this a time where relationship with the NFSP
 3 was fraught or difficult?
 4 **A.** No, I don't think so. I can't remember what the letter
 5 said on 15 September but, no, I would never describe the
 6 situation with the Federation as fraught. We used to
 7 speak our minds, but we were always very positive in the
 8 way that we tackled issues.
 9 **Q.** Turning then to 5 October 2000, if we could turn up
 10 NFSP00000289, this is an update that you provided to
 11 Mr Baker. If we can scroll down, looking at national
 12 roll out progress and if we can look that training:
 13 "Training over 60,000 people has not been without
 14 its problems. Course scheduling and occupancy levels
 15 have been major issues with ICL Pathway over the recent
 16 months. Happily their administration of user training
 17 events is now within acceptable bounds, but we now find
 18 ourselves in the position of training fewer people yet
 19 needing more courses than the contract provides for. To
 20 address the gap we have developed a number of
 21 initiatives including allocating seven delegates to some
 22 courses, redistributing training costs including making
 23 more prudent use of user awareness events and extending
 24 the training window to 10 days before installation. The
 25 extension of the distance limit to 25 miles will also

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1 well received though it did impair the percentage calls
 2 answered under 20 seconds as a consequence of the
 3 duration of the recorded message. This facility was
 4 introduced as a temporary expedient and is to be
 5 withdrawn next week now that all HSH operators are fully
 6 effective. Average number of weekly calls per outlet to
 7 HSH is currently 1.17 compared to 1.4 for the NBSC,
 8 which in itself is 5 per cent lower than the regional
 9 helpline internal calls. NBSC are now achieving almost
 10 all their call handling performance in all dimensions;
 11 the latest time to answer performance is 8 seconds with
 12 over 75 per cent of calls now being resolved by the
 13 initial call handler."

14 At this stage did you feel like Helpdesk
 15 performance was improving or had improved, and were you
 16 happy with it?
 17 **A.** It had improved. We were always watching the
 18 performance of the Horizon System Helpdesk particularly,
 19 because that had been a problem for some time, and we
 20 needed to make sure that it didn't deteriorate. By
 21 comparison, the NBSC at 8 seconds to answer calls was
 22 very much gold standard by comparison with call centres
 23 these days.
 24 **Q.** Turning on to page 4, please, it says "Staff and
 25 Subpostmaster Feedback":

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1 have a beneficial effect."
 2 Did you feel like you had to do the impossible or
 3 do a very difficult task in carrying out this training?
 4 **A.** In this particular aspect of the training, yes, because
 5 we're getting towards the end of the project, having
 6 completed the first sweep over the country, and we were
 7 now faced with a situation where the problems with
 8 scheduling the events in the past had caught up with us.
 9 So we had to take some actions which we didn't want to
 10 take but had to take to get through the project within
 11 the terms of the agreement with ICL.
 12 **Q.** What was morale like in your team at that time?
 13 **A.** The morale in the team was always good. It was a good
 14 team. They were a cheerful bunch, they were very much
 15 a can-do bunch, and we just got on and did it.
 16 **Q.** Turning over to page 2, scrolling down, under Live
 17 Environment:
 18 "Helpdesk Performance -- although there have been
 19 some blips as a result of recent incidents, such as the
 20 instruction of the Inland Revenue working families tax
 21 credit facility, there has been an improvement on both
 22 Network Business Support Centre [the NBSC] and Horizon
 23 System Helpdesk performance. The introduction of
 24 interactive voice response on the HSH on the two busiest
 25 days of the week, namely Wednesday and Thursday, was

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1 "The latest research across a sample of staff and
 2 subpostmasters some two or three months after migration
 3 to Horizon indicates a better feel-good factor across
 4 the network. 94 per cent find the system easy to use,
 5 80 per cent say user training is good and 90 per cent
 6 find balancing easier. Results show a significant
 7 positive movement on live trial and encouraging
 8 improvements on previous research in December 1999. Not
 9 surprisingly, subpostmasters find transactions easier
 10 than balancing to master. After an intense training
 11 course they need time for familiarisation with the
 12 system in their own environment. Other feedback from
 13 outlet visits, Helpdesk calls and other communications
 14 (eg the subpostmaster journal) echoes this feedback."

15 So at this time were you happy with the way that
 16 that feedback had tracked and that it had become more
 17 positive?
 18 **A.** Indeed. I mean, this sort of vindicated the actions we
 19 took at the beginning of that year to get results like
 20 this and, in fairness, when you look at those kind of
 21 percentages, I mean, there would be many retailers these
 22 days, if that was about their products, they'd be very
 23 satisfied with the situation.
 24 **Q.** Do you feel that issues with training might have masked
 25 data integrity issues? People thought that training

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1 issues or Helpdesk problems were the cause of the
 2 problem but, in fact, with hindsight it may have been
 3 data integrity?
 4 **A.** I don't know. I don't feel I'm qualified to answer that
 5 particular question.
 6 **Q.** Is it fair to say at this time in October 2000 you were
 7 assuming that the system wasn't causing balancing
 8 problems?
 9 **A.** I wasn't aware of any balancing problems that were
 10 significant and that would cause any particular problem
 11 to the project, to the subpostmasters or staff who were
 12 involved.
 13 **Q.** If we could turn up the next document --
 14 **SIR WYN WILLIAMS:** Sorry, Ms Kennedy, just so that I'm not
 15 thinking a false point, could you go back a page,
 16 please, on that document.
 17 It's at the bottom of that page 3. No, sorry,
 18 I seem to have -- can you start at the ... yes, that's
 19 it. "Cash accounts". Do you see that paragraph which
 20 appears to be highlighted? What I wondered was this.
 21 If you read that paragraph to yourself, Mr Grey, you'll
 22 see the last sentence in particular:
 23 "The level of errors on Horizon continues to fall
 24 but is still not returned to pre-Horizon levels", and
 25 that relates to cash accounts.

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1 **SIR WYN WILLIAMS:** Right.
 2 **A.** In terms of the level of errors, I'm not quite clear
 3 what I was referring to there, but clearly I've had some
 4 information where I've actually compared it with what
 5 happened before.
 6 **SIR WYN WILLIAMS:** I mean, an interpretation of it is simply
 7 that there are user errors on Horizon which are greater
 8 than the user errors had been prior to Horizon. But
 9 it's also possible that that is an acknowledgement that
 10 there are system errors on Horizon, and I wondered if
 11 you could help me with that. Then, secondly, the second
 12 part of the sentence:
 13 "An analysis of root causes has led to a number of
 14 remedial actions being taken."
 15 I mean, what were the root causes, and what were
 16 the remedial actions?
 17 **A.** I cannot tell you what they are at this point in time.
 18 **SIR WYN WILLIAMS:** All right.
 19 **A.** But Business Service Management had the responsibility
 20 for actually identifying the issues, analysing them and
 21 trying to put things right where there was an identified
 22 cause. I don't think the level of errors is anything to
 23 worry about unduly. I think that is just a reflection
 24 of the fact that there were problems in the system as
 25 people got to grips with it. I was not aware of any

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1 I wondered if you could explain to me what that
 2 relates to so that I don't have any misunderstanding of
 3 it.
 4 **A.** Indeed. Are we talking specifically about the last
 5 sentence, or would you like an explanation about the --
 6 **SIR WYN WILLIAMS:** The whole paragraph, please, but
 7 obviously in the context of that sentence.
 8 **A.** Right. In terms of the unclaimed payments on charge and
 9 receipts, these are discrepancies which have been
 10 identified and are awaiting error notices.
 11 **SIR WYN WILLIAMS:** Yes.
 12 **A.** And there were fewer of these in the automated system,
 13 as one would expect. In fact, that's a benefit of
 14 automation. In terms of the authorised shortages, these
 15 would be amounts which were held in suspense pending
 16 further investigation, probably by the transaction
 17 processing team in Chesterfield, when the cash accounts
 18 were received by them and they were able to match the
 19 cash account with the associated documents and correct
 20 any problems.
 21 Now, it's quite conceivable that there will be
 22 more or those, because the retail network managers were
 23 giving subpostmasters the benefit of the doubt and
 24 putting the items into suspense to give the opportunity
 25 for these to be properly investigated.

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1 system errors, so I don't think that is any undue
 2 concern at that particular point in time.
 3 **SIR WYN WILLIAMS:** All right. Thank you. Sorry,
 4 Ms Kennedy. I just wanted to be as clear as I could be
 5 about what that paragraph meant.
 6 **MS KENNEDY:** Thank you, Chair.
 7 If we could turn up the next document then,
 8 POL00104482, and this is from April 2001. This is
 9 a report that you wrote; is that right?
 10 **A.** Yes.
 11 **Q.** It's called the Project Implementation Review Horizon
 12 National Roll Out. What was the purpose of writing this
 13 report?
 14 **A.** This was really to prepare for the close down of the
 15 project, which was a few months away when this was done,
 16 and this was a draft document to prepare us for that
 17 eventuality.
 18 **Q.** How did you feel about the project at the time of
 19 writing this report? Did you think it had been
 20 a success?
 21 **A.** I did, yes. I know it had been accompanied by various
 22 problems, but all in all I think the achievement of
 23 everybody involved, including subpostmasters, was one
 24 that reflected with credit on them.
 25 **Q.** In this report you go through a number of issues or

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1 themes to do with the system. I wonder if we could turn
2 up page 2, please, and scroll down and down again,
3 please.

4 So at 2.2:

5 "Satisfactory roll out of Horizon to all outlets
6 taking remedial action to secure business performance by
7 initiating or developing policies/frameworks
8 appropriate."

9 So what was this about? What was this heading
10 analysing; do you remember?

11 **A.** Not specifically. No, this, I think, was just to make
12 sure we could maintain the business having rolled out
13 Horizon to the outlets.

14 **Q.** If we go over the page and we look at the first full
15 bullet point, it says:

16 "The absence of a coherent and robust outlet in
17 product reference system was evident at various times
18 during the project."

19 Do you remember what that means or meant?

20 **A.** Yes, that's related to the nature of the outlets. Each
21 sub-post office was quite unique. There were no or very
22 rarely two sub-post offices that were identical and what
23 that was relating to was some kind registry, if you
24 like, or what each office looked like and what
25 facilities it had.

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1 same kind of sharing that actually went on when it was
2 a combined project.

3 **Q.** Did you feel it would have been helpful if things had
4 stayed the way that they were; it was more co-operative?

5 **A.** No, I'm not suggesting it should have carried on as they
6 were, but I think there was certainly scope for improved
7 co-operation between ourselves and Pathway. The
8 relationship with ICL was constructive and cordial, but
9 there were times when we felt that we weren't treated as
10 a valued customer and being given all the information
11 that we felt we had a right to know about.

12 **Q.** What information was that that you felt you didn't have?

13 **A.** Well, it related to particular problems. There were
14 times when we felt we might be being fobbed off, that
15 there was -- either for cultural, commercial or other
16 reasons, we weren't being told all the information that
17 we should really have been given.

18 **Q.** If we turn on to page 6, please, and scrolling down we
19 have "Recommendations", "Supplier Issues" and, looking
20 at the first bullet point, it says:

21 "The project understandably for its size and
22 nature had a heavy contractual overlay. Despite best
23 endeavours to establish open, constructive,
24 customer-focused and forward-looking relationships with
25 ICL Pathway directors, we did not succeed in mirroring

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1 **Q.** If we could turn over to page 5, please, and scroll
2 down, please. You have got "Performance Operational",
3 and then scrolling down again, please, "Performance
4 Technical". So were those divided in between the
5 operation of the system on the ground and then
6 technically the detail that's kind of in the back office
7 or on the computer system itself?

8 **A.** Sorry, I'm not clear.

9 **Q.** What is the difference between performance operational
10 and performance technical?

11 **A.** Right. Well, operational would be what actually
12 happened out in the field. Technical would be the
13 system and the way it was put together and rolled out.

14 **Q.** If we look at Performance Technical, it says:

15 "Technical oversight and validation of ICL Pathway
16 activities was almost non-existent compared with the
17 preceding live trial and development phase. Although
18 this was not really a problem, it is an area that should
19 not be overlooked either in the Horizon maintenance
20 phase or in future projects."

21 What did you mean by that?

22 **A.** I think that relates to the fact that it had changed
23 from being a sort of a three-party project to
24 a two-party project, and it became a much more
25 commercial contract arrangement, and there wasn't the

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1 the relationships which existed at working level.
2 Consequently, consideration ought to be given in similar
3 supplier-dominated projects in future as to how we can
4 secure commercial benefit via a more creative,
5 constructive and less restrained joint working or
6 partnership arrangement at all levels so that both
7 parties secure a win-win position."

8 The second bullet point:

9 "We should never again put ourselves in the
10 position of dependence on either a sole supplier (or,
11 indeed, supplier-dominated project progress information)
12 without first establishing a defined and adequate
13 contingency. At the outset we should assure customer
14 pre-eminence with any future supplier who must commit to
15 identify, agree and deliver to our requirements,
16 including detailed performance metrics and integrated
17 reporting structures. Furthermore, any future supplier
18 must empower their local field teams to mirror the
19 responsibilities we invest in our people."

20 So what are you saying there?

21 **A.** Effectively we're saying that the customer has got to
22 come first, and we've got to make sure that any
23 contractual arrangement we have with any future supplier
24 has got to recognise that, and we build the project
25 around it.

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1 Q. What about the first line:
 2 "We should never again put ourselves in the
 3 position of dependence on either a sole supplier ..."
 4 So what's the learning point from dependence on
 5 a sole supplier?
 6 A. Well, in a sense, because of history on this particular
 7 project we were left with effectively no alternative but
 8 to go with ICL, and maybe what should have been
 9 a preferable route is to have competitive tendering.
 10 Q. Could you turn over to page 8 of that document and
 11 scroll down, please. Under "Training", it says:
 12 "All training courses and training content to go
 13 undergo more in-depth development and quality checks
 14 prior to delivery to ensure user comfort. Training
 15 should be viewed as a process rather than event and
 16 ensure it caters for different learning pace, styles and
 17 requirements. A one-size-fits-all approach is not
 18 always appropriate, especially if an established
 19 learning environment does not exist."
 20 Were you disappointed with the level of training
 21 when you first came on board versus by the end of this,
 22 after all your efforts?
 23 A. I think perhaps it hadn't been given the attention that
 24 perhaps it had deserved but in fairness there was a lot
 25 of other issues going on at the same point in time.

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1 A. I think these took place on a monthly basis, though I've
 2 a feeling about this point in time it actually reduced
 3 to two-monthly.
 4 Q. If we turn on to page 2, we can see the notes and we can
 5 have the action -- we see the action point number the
 6 details, date to be completed by, the owner, the actions
 7 taken and the action points status. So at these
 8 meetings did someone raise an issue, someone made a note
 9 of it, and then it was tracked? Is that how that took
 10 place?
 11 A. Yes.
 12 Q. How were the action points carried forward?
 13 A. Well, they were tracked at each meeting. So it was
 14 actually being work that was being taken away from the
 15 meeting and done offline, so to speak, and the meeting
 16 maintained an oversight to make sure that progress was
 17 being maintained towards resolution.
 18 Q. Did you find that relationships were good in this forum
 19 and that it was useful?
 20 A. Yes, I think again there was the issues about the not
 21 always sharing information with us but, yes, they were
 22 generally useful and, in fairness, I think we got a fair
 23 bit done.
 24 There is an example in another document that I've
 25 seen which relates to the fact that we were working

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1 But, in fairness, we rescued the situation and, whilst
 2 there might have been some hiccups along the way,
 3 I think we got through pretty well despite.
 4 Q. Even in light of these problems that you flagged in the
 5 report, were you optimistic about the continued
 6 involvement of ICL going forward?
 7 A. I wasn't particularly optimistic. I mean, it was
 8 something that we needed to keep our eye on. Once I got
 9 to Business Service Management, it was fairly clear we
 10 had to monitor the Horizon System Helpdesk performance
 11 on an ongoing basis, because that was still an issue.
 12 So we couldn't take our eye off the ball at all.
 13 Q. Moving forward to 26 November, if we could pull up
 14 FUJ00119979. These are the notes of a Horizon Service
 15 Review Forum, and we can see there that you were the
 16 Chair of this. What was the Horizon Service Review
 17 Forum?
 18 A. Well, as it says there, in the Purpose towards the
 19 bottom of that page, it was to discuss with ICL how they
 20 were meeting their performance objectives.
 21 Q. How useful did you find this as a forum?
 22 A. To be honest, I'd forgotten we ever had these, but
 23 clearly it was a means of actually debating face-to-face
 24 the real issues of the day.
 25 Q. How often did these take place; do you remember?

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1 together to have a better service for the post offices
 2 by a closer arrangement between the Horizon System
 3 Helpdesk and the NBSC.
 4 Q. Turning forward to 1 December 2001, if we could turn up
 5 FUJ00120085, this is an ICL document. It's a customer
 6 satisfaction scorecard. So you wouldn't have seen this
 7 at the time, would you?
 8 A. Well, I think I must have done because down the bottom
 9 there it's got "Signed by head of BSM", or there's space
 10 for it anyhow, and I suspect this was something that was
 11 actually being pioneered.
 12 Q. So do you remember receiving these on a regular basis
 13 and signing them?
 14 A. I don't remember doing so. I don't know whether this
 15 was a prototype which never took off or whether it was
 16 something that did in fact become a regular occurrence.
 17 I can't recall honestly.
 18 Q. Turning over to the second page, it says:
 19 "Scorecard quarter ending November 2001", and it
 20 says:
 21 "Don Grey: difficult and thought-provoking
 22 exercise. POL comment sometimes reflects ICL Pathway in
 23 general."
 24 Do you have any idea what this is about or do you
 25 remember saying this? How would this be recorded?

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1 A. Well, this is relating to the score card we've just been
 2 looking at, and this is what makes me think it might
 3 have been a prototype that were actually being suggested
 4 by ICL as a means of actually doing on a regular basis.
 5 But whether it ever took off regularly, I don't know.
 6 Q. Did you find it a difficult and thought-provoking
 7 exercise?
 8 A. I must have done to say that.
 9 Q. If we could then turn up FUJ00080421, this is from
 10 25 September 2002, and this is an agreement about the
 11 interaction between the NBSC and the Horizon System
 12 Helpdesk. Do you remember how well these two helpline
 13 entities were working together at this time?
 14 A. Well, I think there is a sense of operating in different
 15 silos initially, and this was an attempt to really bring
 16 together and to try and make them seamless as far as the
 17 post offices were concerned.
 18 Q. So this was produced in recognition of a problem about
 19 the fact that two were working in silos and there needed
 20 to be greater cooperation?
 21 A. Yes, it was more a recognition of an improvement
 22 opportunity rather than a problem, I think.
 23 Q. If we turn over to page 7, for example, and scrolling
 24 down and down again, please, we can see that the scope
 25 of the document is set out:

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1 were part of this particular document, but I would have
 2 expected that they would have been provided to call
 3 handlers in a much more understandable way than this
 4 document.
 5 Q. By the time you left, how well did you feel these two
 6 systems operated co-operating with one another?
 7 A. Much better but still scope for improvement.
 8 Q. What did you think that could have been improved?
 9 A. There were things that could be improved. I can't
 10 remember what they were specifically, but we could never
 11 take our foot off the pedal because we needed to make
 12 sure that the performance didn't falter.
 13 Q. Mr Grey, those are all the questions that I had for you.
 14 Chair, do you have any questions at this stage?
 15 **SIR WYN WILLIAMS:** No, thank you very much, no.
 16 **MS KENNEDY:** I think Mr Jacobs has some questions, as does
 17 Ms Patrick and Mr Henry, starting with Mr Jacobs.
 18 **MR JACOBS:** Thank you, sir. Can I just confirm that you can
 19 hear me.
 20 **SIR WYN WILLIAMS:** Yes, I can, yes.
 21 **Questioned by MR JACOBS**
 22 Q. Thank you. Mr Grey, good morning. I want to ask you
 23 some questions on behalf of the 156 subpostmasters,
 24 mistresses, assistants and managers that I represent
 25 instructed by Howe+Co and, in particular, some points

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1 "How the NBSC and HSH will provide a seamless
 2 incident management service to Post Office and agreed
 3 POL and Fujitsu Services Pathway Support Groups."
 4 Looking down that bottom of the page, it says:
 5 "The document defines exceptional event as an
 6 event that may cause a 75 per cent increase in call
 7 volume and/or is likely to impact the operation of the
 8 call management process. Under these circumstances,
 9 direct communication will take place between HSH and
 10 NBSC."
 11 Was that the real concern, that both parties
 12 should be sharing information on when something is
 13 likely to increase call volumes?
 14 A. That was one of the issues it was trying to address.
 15 The other one was to make sure that people weren't being
 16 passed between call centres unnecessarily.
 17 Q. Was that the feedback that you were receiving at this
 18 time, that people were being passed between them?
 19 A. No, no, no, but we identified it as the way that we
 20 could actually provide a better service together.
 21 Q. If we could turn up page 14, please, we have some
 22 diagrams, if we can scroll down. This is the interface
 23 between NBSC and HSH. Were these provided to helpline
 24 operatives?
 25 A. To be honest, I don't know where these ended up. They

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1 you make in your statement about the Horizon Helpdesk
 2 and the user manual and the Christmas Horizon research
 3 Report.
 4 So could we perhaps go to paragraph 4(e) of your
 5 statement which deals with the Horizon Helpdesk and
 6 that's at page 7 of 26, WITN05220100.
 7 Just waiting for it on the screen there. So you
 8 can see that in that statement you say at the end in
 9 relation to the Helpdesk:
 10 "The time to answer and the quality of responses
 11 was regularly monitored and improvements were made when
 12 required."
 13 Do you accept that's what you say about how the
 14 Post Office dealt with the Helpdesk?
 15 A. Yes.
 16 Q. Now, in your evidence this morning you said, "It was
 17 clear that we had to monitor the Horizon System Helpdesk
 18 performance as an ongoing issue, so we couldn't take our
 19 eye off the ball at all." Is that right?
 20 A. Mm-hm.
 21 Q. Did you listen to the evidence that was given by
 22 subpostmasters in Phase 1 of this Inquiry from February
 23 to May 2022?
 24 A. No, I haven't.
 25 Q. I wanted to put to you some of what the subpostmasters

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1 whose evidence was uncontested said about the Helpdesk
2 in this Inquiry. We've looked at 102 of our clients'
3 statements. 50 of them gave evidence live, the rest
4 were read into the record. 88 of our clients gave
5 evidence that Horizon staff were incompetent.

6 Is that something that you knew about, that that
7 was the general view about Helpdesk staff?

8 **A.** No, not at all. I think we need to distinguish between
9 the two Helpdesks. The Network Business Support Centre
10 I would not describe as incompetent, nor would I do so
11 for the Horizon System Helpdesk. There were resourcing
12 issues and scheduling issues at the Horizon System
13 Helpdesk at certain points in time, and they were
14 addressed after we made some challenges to get them to
15 improve their service.

16 At what point in time are we actually talking
17 about with those statements a matter of interest?

18 **Q.** Throughout the course of the scandal, from rollout
19 through to the litigation, a wide variety of time
20 ranges.

21 **A.** Right. Well, I'm talking about the time I was actually
22 with the project and with the Business Service
23 Management which ended in early 2003.

24 **Q.** Yes, of course, and of course --

25 **A.** I can't say.

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1 **A.** Not that I am aware of, and I wouldn't be too happy
2 about that message actually being given out. Do we know
3 which Helpdesk we're talking about?

4 **Q.** This is the Horizon Helpdesk.

5 **A.** Right, this is the ICL one?

6 **Q.** Yes.

7 **A.** Right.

8 **Q.** 36 of our clients were told, "You have to pay the
9 shortfall because under your contract you are bound to
10 do so." Is that advice that you recall being given?

11 **A.** Well, subpostmasters had the responsibility for making
12 good losses -- that was part of the contract -- and it's
13 quite conceivable it was something to that effect in the
14 scripts but, as I say, I can't recall.

15 **Q.** If the Inquiry wanted to -- and this is a fishing
16 expedition, sir, and I apologise for that -- if the
17 Inquiry wanted to find these scripts, do you know who
18 might have them or where they might be located?

19 **A.** I don't know where they would be now, but in my day they
20 would be in each of the respective Helpdesks.

21 **Q.** You see, our clients say, all of them say, that the
22 Helpdesk service was woeful and that it did not improve.
23 Do you accept that there is a significant disconnect
24 between the uncontested evidence of subpostmasters in
25 this Inquiry, and your evidence that the Post Office

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1 **Q.** You can only give evidence from what you experienced.
2 So, in the time that you were involved, our clients, 18
3 of them say that, when they eventually got through to
4 the helpline, the people who were supposed to be helping
5 them were just reading from a script. Is that something
6 that you are aware of, a complaint that you received?

7 **A.** It's not a complaint. I mean, call handlers do work
8 from scripts, and that's very important to make sure
9 that there's consistency of message.

10 **Q.** Did you see the scripts that the call handlers were
11 working from?

12 **A.** I must have seen them at some point in time, but
13 I wasn't involved in vetting them and making sure they
14 were fit for purpose. That was the responsibility of
15 others in the team.

16 **Q.** Can you describe what the scripts looked like, what the
17 format was, from the ones that you saw?

18 **A.** Not from memory I can't, no.

19 **Q.** One of the issues that subpostmasters have raised, 39 of
20 our clients say they were told, expressly told, that
21 they were the only person experiencing problems with the
22 Horizon System. Now, that's a theme that emerged from
23 the evidence, and we say it can't be a coincidence.

24 Are you aware that there was anything to that
25 effect within the scripts themselves?

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1 monitored it, made sure that there were improvements,
2 and kept their eye on the ball?

3 **A.** I don't accept there is that disconnect. I mean,
4 clearly there are people who would not be too happy with
5 the service that may have been provided at various
6 stages in the project, even in basic business-as-usual
7 operations. It's unfortunate, but those are issues that
8 need to be addressed specifically at the time.

9 **Q.** I'm going to move on in a minute, but I just want to
10 take you to your statement again and what you say at
11 paragraph 4.

12 **SIR WYN WILLIAMS:** You are very quiet now, Mr Jacobs. Can
13 you address that, please.

14 **MR JACOBS:** Yes, I think that's a bit closer.

15 You say at paragraph 4(e):

16 "The time to answer and the quality of responses
17 was regularly monitored and improvements were made where
18 required."

19 In hindsight, in relation to the evidence that
20 this Inquiry has heard and accepted, do you accept that
21 that statement is not correct?

22 **A.** No, I don't accept it's incorrect. We did, in fact,
23 monitor performance of both Helpdesks and we did make
24 improvements.

25 **Q.** Well, we'll move on.

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1 In relation to the user guide or helpbook, you say
 2 that the Christmas Research Report said that just over
 3 half, that's 55 per cent, of users found this guide
 4 helpful. Not one of our clients --

5 **A.** Are we talking about the Horizon user guide here?
 6 **Q.** This is the Horizon user guide or the handbook that you
 7 are referring to at 4(f) in your statement:
 8 "All post offices were issued practical user
 9 handbook, the Horizon Guide, to explain in some detail
 10 Horizon operations and assist their move to the new
 11 system."
 12 It's that guide I'm referring to.

13 **A.** Right.
 14 **Q.** Not one of our clients has said that this guidebook was
 15 of any use to them whatsoever. What do you have to say
 16 about that?
 17 **A.** Well, there were a number who would prefer to phone the
 18 Helpdesk rather than read the guide and that, I think,
 19 is also covered in the research.
 20 **Q.** Do you agree with the benefit of hindsight that the
 21 Horizon Christmas Research Report, even though it was
 22 relatively negative feedback, nevertheless overstated
 23 the usefulness of this guide to subpostmasters when the
 24 problems started to materialise?
 25 **A.** No, and I don't accept that the research report was

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1 **Questioned by MS PATRICK**
 2 **Q.** Mr Grey, my name's Angela Patrick. Can you see and hear
 3 me?
 4 **A.** I can indeed, yes.
 5 **Q.** I act for a number of subpostmasters with Mr Moloney KC
 6 instructed by Hudgells, and our clients, over 60 of
 7 them, were convicted but have since had their
 8 convictions quashed. We would like to ask you a few
 9 questions about one issue, and I hope you will be glad
 10 to hear it's not about training, and it's not about the
 11 Helpdesk.
 12 Can we look again at the letter that you have been
 13 taken to this morning that was sent to you in May 2000.
 14 You have seen a lot of documents. I will bring it up so
 15 that you can see it. It's NFSP00000332. If you
 16 remember, this was the letter about non-polling. Can
 17 you see it now?
 18 **A.** I can, yes.
 19 **Q.** That page is pretty familiar to you because Ms Kennedy
 20 has taken you through some of this already and, if you
 21 remember, it was about non-polling, which I think you
 22 recalled was a significant problem.
 23 **A.** It was a problem -- significant perhaps might be going
 24 too far but at particular points in time it may have
 25 been.

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1 negative. There was some positive information in there
 2 as well, some very really improvement opportunities, but
 3 it certainly wasn't negative in total.
 4 **Q.** Mr Grey, a large number of my clients and a very large
 5 number of subpostmasters were very badly let down by the
 6 Helpdesk. Do you have anything that you would like to
 7 say to them?
 8 **A.** Well, all I can say is I'm sorry to hear that and, had
 9 I known that at the time that I was in charge of the
 10 Helpdesks, I would have certainly taken that forward on
 11 their behalf.
 12 **Q.** Finally, a significant number of subpostmasters have
 13 said that they were advised by Helpdesk that they were
 14 the only ones experiencing problems with the Horizon
 15 System. Do you have anything to say to that?
 16 **A.** Again that is not a very helpful comment to make and,
 17 had I known that at the time, then that again would have
 18 received my attention.
 19 **MR JACOBS:** I'm just going to ask if there are any more
 20 questions that I have to ask you. No, that's it, thank
 21 you.
 22 Thank you, sir.
 23 **MS KENNEDY:** Ms Patrick?
 24 **MS PATRICK:** Thank you.
 25 ///

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1 **Q.** I want to look at the second page. If we can turn over,
 2 and specifically I want to look at the second paragraph
 3 if that could be highlighted for you. If we see there:
 4 "After the meeting this afternoon, I received
 5 a phone call from Colin Baker and he tipped me off that
 6 the DTI representative at the conference had reported
 7 back the problems with polling, and that Alan Johnson,
 8 Minister for Competitiveness at the DTI (and responsible
 9 for the Post Office) has asked for a copy of
 10 transcript of this part of the conference."
 11 Now, you said this morning that you were being
 12 copied in on a lot of things that really wouldn't
 13 specifically require your attention. Would this, the
 14 minister responsible for the Post Office seemingly
 15 expressing an interest in or a concern about
 16 non-polling, be a significant issue?
 17 **A.** Yes, this coincided with me being at the conference as
 18 well and, as I recall, this actually happened while
 19 I was either at the conference or in transit from it.
 20 **Q.** This was you essentially being alerted to the minister
 21 being aware of these problems, wasn't it?
 22 **A.** Yes, indeed.
 23 **Q.** It was really something you ought to have been aware of,
 24 wasn't it?
 25 **A.** Yes, indeed, and I was in fact copied in on that

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1 correspondence, but what they had actually initiated was
 2 an enquiry in my absence to actually identify what had
 3 been going on.
 4 Q. Can you remember what the Post Office Horizon team did
 5 with this information and what happened next?
 6 A. I think, if you scroll on in that document or associated
 7 document with that, I think there was some indication of
 8 what actually happened, that someone had picked this one
 9 up and was actually running with it.
 10 Q. I think we can see it is -- "Can you go back to Colin
 11 and reassure him", and it has a number of bullet points
 12 there, but none of them appear to relate to the
 13 minister.
 14 Do you know if you contacted the minister or his
 15 team?
 16 A. I didn't contact the minister or his team, no, no.
 17 I don't know who had that responsibility, but I wasn't
 18 the only one that was copied in on this letter.
 19 Q. Do you know if anybody else in your team may have spoken
 20 to him or his team?
 21 A. I doubt it but it is possible. Something like this
 22 would normally be handled by the public relations
 23 people, I suspect.
 24 Q. Who was above you in the management line between you and
 25 the board at this time?

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1 A. Yes.
 2 Q. We don't need to look at it all. He talks about his
 3 long connection with the Post Office, his admiration for
 4 people working for the Post Office, and he describes the
 5 institution as "a Methuselah of the public sector". We
 6 don't need to look at it all -- the Inquiry's seen the
 7 evidence before -- unless you need to have some of it.
 8 On page 5 he turns to Horizon. I'll paraphrase.
 9 He talks about the Government's decision to get Horizon
 10 back on track, ACT being inevitable, and opportunities
 11 for the Post Office in Network Banking and the universal
 12 bank. He ends on the Government's vision, and he talks
 13 about the promise of the universal bank, and banks being
 14 attracted by the incentive of the Horizon automation
 15 platform.
 16 Was that your recollection that ministers, Fujitsu
 17 and the Post Office were all at this time all focused
 18 first on the opportunities for Horizon?
 19 A. That was the bigger picture, but on the ground we were
 20 very much focused on making the project work.
 21 Q. Yes. For those opportunities to work, first Horizon had
 22 to work, didn't it?
 23 A. Indeed.
 24 MS PATRICK: Thank you. I don't have any other questions
 25 for you, Mr Grey.

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1 A. Well, David Smith was my boss. He was director of
 2 automation and he was actually on the board.
 3 Q. I think Stuart Sweetman told us he was director at POCL
 4 until November 2001. Is that right?
 5 A. Stuart himself, you mean?
 6 Q. Stuart Sweetman.
 7 A. Yes, Stuart Sweetman was the managing director, as I
 8 understand it -- I think was his title.
 9 Q. You've said this morning that you were aware of
 10 Mr Johnson giving evidence to the Inquiry. Did you
 11 listen to his evidence or did you read it?
 12 A. No, I listened to it.
 13 Q. Okay. I think, just to refresh your memory, his
 14 evidence put briefly was that ministers were really
 15 looking to the future for Horizon rather than the
 16 technical problems, and he said in his statement:
 17 "No-one was flagging up major concerns.
 18 Everyone's attention was on the new work that Horizon
 19 could attract."
 20 The Inquiry's seen some examples of is. I'll
 21 bring it up just in case you haven't seen it. We've had
 22 it this morning, NFSP0000436, and if we look at the
 23 bottom of page 2 in that document, it's the report of
 24 the conference that we've been talking about. We can
 25 see that there was an address by the minister.

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1 MS KENNEDY: Mr Henry?
 2 Questioned by MR HENRY
 3 MR HENRY: Hello, Mr Grey. Can you hear, sir?
 4 A. I can.
 5 Q. Good. You've already been shown today, so there's no
 6 need for it to be put up on the screen, NFSP00000287.
 7 I suggest that it's apparent from that document that you
 8 are trying to drill down and investigate glitches, and
 9 you were taken to that document by Ms Kennedy.
 10 But you, of course, were the national roll out
 11 manager appointed in January 2000 but, from July 2001,
 12 you moved into the BSM function, didn't you?
 13 A. Yes.
 14 Q. Then of course you retired in March 2003.
 15 A. Mm-hm.
 16 Q. Correct?
 17 A. Yes.
 18 Q. So what I want to sort of try and explore with you is
 19 perhaps a change in culture after you left because I've
 20 been given permission to ask you about events that
 21 occurred in 2005. Do you follow?
 22 A. Yes.
 23 Q. Now, you say at various points in your statement -- and
 24 I'm not going to go to them because you have adopted
 25 it -- but just for your benefit, sir, and for the

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1 Chair's benefit, your paragraph 10(d) at page 20 of 26
 2 that -- and I'm gisting this -- BSM would try to resolve
 3 issues with root-cause analysis and transparency, good
 4 communication, et cetera. You agree that's what you
 5 said?
 6 **A.** Yes.
 7 **Q.** Paragraph 11(a), page 21, that bugs, errors and defects
 8 they weren't hidden, they were deal with candour and
 9 openness, correct?
 10 **A.** *(The witness nodded)*
 11 **Q.** Then paragraph 13, this is about error reporting,
 12 paragraphs 23 to 26, error reporting, essentially there
 13 was an open-business culture that people were encouraged
 14 to report errors, and errors weren't being suppressed?
 15 **A.** That's right.
 16 **Q.** Now, sir, have you read -- and no criticism if you have
 17 not -- any of the judgments of Mr Justice Fraser such as
 18 the common issues judgment or the Horizon IT judgment?
 19 **A.** No, I haven't.
 20 **Q.** You haven't. Did it ever come to your attention,
 21 directly or indirectly, while you were at the
 22 Post Office that subpostmasters were not being told
 23 about known errors in the Horizon IT System?
 24 **A.** No. But there was no widespread arrangement to tell
 25 subpostmasters but every problem. Where it was

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1 which had in our view, in the light of the information
 2 we received, have any impact on them.
 3 **Q.** This is very much, is it not, a sort of patriarchal or
 4 patronising approach, in the sense that you are making
 5 value judgments about what the children need to know,
 6 aren't you?
 7 **A.** No, I don't accept that. What we are doing is we are
 8 exercising proper judgment and sharing with them as
 9 appropriate.
 10 **Q.** Can I just ask you to go back to your previous answer to
 11 me, because you were saying you were relying on
 12 information that was coming in from the field and also
 13 the Helpdesk. Do you remember saying that just a short
 14 while ago? So it follows that this information that it
 15 doesn't need to be disseminated is coming from among the
 16 field, in other words the branches, and also
 17 subpostmasters calling the Helpdesk. How could that not
 18 affect or potentially affect other postmasters?
 19 **A.** It depends on the nature of the problem. You see, what
 20 we're talking here is quite generally there could be
 21 specific problems which were not apparent to
 22 subpostmasters which we were actually dealing with
 23 ourselves behind the scenes.
 24 **Q.** That wouldn't of course arise from the field or the
 25 Helpdesk, would it?

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1 important to them, we would actually communicate that to
 2 them, but there were times when many of these, if you
 3 like, were transparent and not apparent at the outlet
 4 level where they were not communicated.
 5 **Q.** Where did this no-need-to-know or need-to-know culture
 6 originate because it follows, doesn't it, that somebody
 7 is making a judgment about what the end user needs to
 8 know about apparent errors in the system?
 9 **A.** Where there was any effect on the users, they were
 10 advised about the situation. If it didn't affect the
 11 user, there was no need to know, because there was lots
 12 going on in the background about trying to improve
 13 issues between ourselves and ICL which had no impact on
 14 the local user in terms of them knowing about any
 15 potential problems.
 16 **Q.** Upon whom were you relying for information about whether
 17 this would, to use your words, impact or not affect the
 18 end user?
 19 **A.** We were relying on general feedback from the field, from
 20 the Helpdesks and from anybody who may have been
 21 involved in identifying what the root cause of that
 22 particular problem was. There was a long time been
 23 a requirement from subpostmasters, that they wanted
 24 simpler and fewer messages, and what we didn't want to
 25 do was burden them unnecessarily with communications

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1 **A.** No, it wouldn't, but that was one of the other issues
 2 that was relevant at the time.
 3 **Q.** Just coming back to your immediate last answer, that's
 4 precisely the problem, isn't it, that postmasters
 5 weren't aware? We've seen evidence, for example, of the
 6 Helpdesk where -- and this was put to Mr Terry Austin,
 7 this document. Did you know Terry Austin?
 8 **A.** I don't know him. I know the name.
 9 **Q.** You know the name. Did you have an opportunity to look
 10 at his evidence?
 11 **A.** No.
 12 **Q.** No. Well, fair enough. Where the Helpdesk is being
 13 criticised by Mr Colin Baker because subpostmasters
 14 don't know that these errors are occurring. A number of
 15 things are just happening, as it were, without their
 16 knowledge, and they are unsighted on these errors.
 17 **A.** Which Helpdesk are we talking about, and what point in
 18 time?
 19 **Q.** Well, that was not the NBSC; that was the Horizon
 20 services Helpdesk.
 21 **A.** Right, which we had no direct responsibility for.
 22 **Q.** Of course, but you, being, as it were, the correspondent
 23 party, the client, Post Office POCL, you would obviously
 24 be very concerned about that, wouldn't you, or ought to
 25 have been?

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1 A. Sure, if we were aware of it, yes.
 2 Q. Can I just ask you this, and this is round about 2000
 3 this document -- in fact, it is 2000 -- can I just ask
 4 you, please, casting your mind back, surely that concern
 5 must have been drawn to your attention then?
 6 A. I wasn't aware of it.
 7 Q. You, of course, were the Horizon National Roll Out
 8 Project Manager and you weren't aware of it?
 9 A. But without responsibility for the live environment at
 10 that point in time.
 11 Q. Why, as the National Roll Out Project Manager, did you
 12 not have responsibility for the live environment?
 13 A. Because that was the responsibility of others. I didn't
 14 have responsibility for all the Horizon project, only
 15 for actually the preparation, the training, the
 16 installation of the system across the network.
 17 Q. I see. So with this, as it were, fragmentation of
 18 information, with these hermetically-sealed managerial
 19 boxes, are you telling the Chair that you did not know
 20 about this?
 21 A. Yes.
 22 Q. Do you think that that was an optimal way of rolling out
 23 a system?
 24 A. Well, it was for others to actually have that
 25 responsibility, and it could well be that others knew

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1 problem, and the problem was that they were quite
 2 frequently being advised by both HSD and also NBSC to
 3 accept and roll over notwithstanding the dispute. I ask
 4 you again: that would be wholly irregular, wouldn't it?
 5 A. It would seem to be so, but we had an arrangement where
 6 that could have been properly accounted for, and that
 7 was established and that should have been followed.
 8 Q. So it was wholly irregular.
 9 A. I wouldn't like to --
 10 Q. Why not? Why would you not like to say when you have
 11 said that, first of all, that isn't the right advice
 12 and, secondly, there was a potential solution, and that
 13 advice that they were given completely ignored that, as
 14 you have posited, that potential solution?
 15 A. Well, I'm sure you are quite sincere in what you are
 16 saying. I would want to find out more information
 17 before I could make a statement like that.
 18 Q. Okay. I'm now going to come to a matter that occurred
 19 outside your remit, and I would be very grateful -- this
 20 document, sir, has been notified to the Post Office, and
 21 it's the evidence of Mr Kelly during the human impact
 22 statements on 1 March 2022, and I would like to take it
 23 from page 77 of that transcript -- page 77 of that
 24 transcript, sir, from 1 March.

It was actually in the rule 10 question that we

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1 about it. Clearly, if it had had an impact on the
 2 rollout, then I would have liked to have known about it.
 3 Q. Can I ask you, please, were you aware -- and this is
 4 both the Horizon Services Helpdesk, so therefore the
 5 ICL, but also the NBSC -- were you aware that they were
 6 advising SPMs to carry on balancing to produce cash
 7 accounts in order to roll over; in other words, they
 8 couldn't roll over unless they accepted figures that
 9 they disputed?
 10 A. I couldn't answer that question. I wasn't aware of it,
 11 but I have become aware of it having seen some documents
 12 and watched the various testimonies to the Inquiry.
 13 Q. That would have been, in your view, utterly
 14 unacceptable, would it not?
 15 A. Well, there was a way of actually dealing with
 16 situations like this. The amount would have been put
 17 into suspense. The account would have been rolled over
 18 and that would give more time for the amount in suspense
 19 to be properly investigated and reasons found for it.
 20 Q. Was the suspense function removed from the system during
 21 your time at the Post Office or afterwards?
 22 A. I think it must have been afterwards. I don't recall
 23 that.
 24 Q. I see. But anyway without, as it were, offering
 25 a solution, I'm just asking you to comment on the

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1 were given permission to ask but, not to worry, I can
 2 just go to the gist. Don't worry about it; I'll just go
 3 to the gist.

This gentleman, sir, long after you had retired,
 had identified a bug, and it was a bug that would double
 up; so, in other words, you would enter, let's say,
 a £200 British Telecom bill and then the system would
 think that there were two times £200 British Telecom
 bills and, similarly, you might put in a £400 deposit,
 and it would come up as two £400 deposits, and so it
 would double up deposits and withdrawals and also
 sometimes liabilities for, let's say, paying a bill.

Do you follow?

1 A. Yes.
 2 Q. Now, this gentleman whose --
 3 A. Was it a postmaster incidentally?
 4 Q. This gentleman was a postmaster, but he was also
 5 a computer science graduate, and his family had had
 6 generations of postmasters, and he just wanted to help
 7 his Mum out because she was not particularly well at the
 8 time. So he came in and tried to help her out.
 9 He communicated this to both the Post Office
 10 helpline and also the Fujitsu helpline, okay; do you
 11 follow?
 12 A. I do, yes.

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1 Q. He was told that they were not going to send a memo out
 2 to tell people, they were not going to do that, they
 3 were just going to let it carry on.
 4 That's hardly open and transparent, is it?
 5 A. I agree.
 6 Q. Now, if you were in charge then, you would not have let
 7 that happen, would you, if that had come to your
 8 attention?
 9 A. Had I known about it individually, yes.
 10 Q. Had you known about it -- because now I want to explore,
 11 from that problem being notified to both the Pathway or
 12 Fujitsu at that time Helpdesk and also the Post Office
 13 NBSC Helpdesk, how many layers of management were there
 14 before it would have got to you, when you were both,
 15 first of all, in your role as roll out manager but then
 16 head of BSM? How many parts of the hierarchy would it
 17 have to ascend before it got to you?
 18 A. Probably three or four, but there was a recognised
 19 process for dealing with these. An incident like that
 20 should have been referred to Business Service Management
 21 to actually do an analysis of that particular problem
 22 and to issue a solution.
 23 Q. The upshot of that gentleman's evidence was that, to his
 24 knowledge, no other subpostmasters were alerted to the
 25 existence of this bug?

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1 **SIR WYN WILLIAMS:** Reasonably, all right, and the plan is
 2 that we start with Ms Palmer and then, because
 3 Mr Rollason is remote, he can carry on after she
 4 finishes after a suitable break, yes?
 5 **MS KENNEDY:** Yes, Chair.
 6 **SIR WYN WILLIAMS:** Thank you. All right then. Until
 7 tomorrow, goodbye.
 8 **MS KENNEDY:** Thank you.
 9 (12.15 pm)
 10 (Adjourned until 10.00 am the following day)
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1 A. Well, if he says that, fine. I can't say what happened
 2 after I left the business, though.
 3 Q. Of course in 2005 you'd been gone for two years, but may
 4 I ask you, please, since that time, from information you
 5 have read, did you ever become aware of the
 6 callendar square bug?
 7 A. No.
 8 Q. You don't. Well, then I ask you no questions about
 9 that. Thank you very, very much, sir, and thank you,
 10 sir, for allowing me to ask those questions.
 11 **SIR WYN WILLIAMS:** So is that all the questions for Mr Grey?
 12 **MS KENNEDY:** Yes, Chair.
 13 **SIR WYN WILLIAMS:** Well, thank you very much, Mr Grey, for
 14 coming to give oral evidence this morning and answering
 15 questions from a number of people. I'm grateful to you.
 16 A. Thank you, sir.
 17 **MS KENNEDY:** Chair, that's our only witness for today. So
 18 we're back tomorrow at 10 am with Ms Rita Palmer and
 19 then Mr Trevor Rollason.
 20 **SIR WYN WILLIAMS:** Yes, Mr Rollason was due to give evidence
 21 today, was he not, but there's been some difficulty in
 22 arranging that? How confident are we that he can give
 23 evidence tomorrow, if you know the answer, Ms Kennedy?
 24 Sorry to put you on the spot.
 25 **MS KENNEDY:** Can I put it this way, Chair: reasonably.

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