

Witness Name: Trevor Rollason

Statement No.: WITN05240100

Dated: 6 January2023

## POST OFFICE HORIZON IT INQUIRY

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### FIRST WITNESS STATEMENT OF TREVOR ROLLASON

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I, *Trevor Rollason*, will say as follows...

I had a telephone conversation with two members of the Inquiry's legal team on 8 December 2022. They asked me a series of questions, which I answered. The Inquiry then prepared a draft witness statement and sent it to me on 19 December 2022. I read the draft statement carefully and had a further discussion with a member of the Inquiry's legal team on 21 December 2022. I have made amendments to this statement which have been incorporated prior to signing this final version.

#### Background

1. I have been asked about what jobs I held before working at the Post Office. Prior to joining the Post Office, I had a paper round and worked at Tesco. I had no prior employment in IT or Training roles.

2. I have been asked when I joined the Post Office and about what jobs I held at the Post Office before I worked on the Horizon IT Project. I joined the Post Office in 1974 straight from school. I undertook a six-week counter training course and then spent 3 to 4 years working as a Counter Clerk in a Branch Office. I then worked as an Acting Branch Manager at a number of different branches around the Essex area. These included the Chelmsford and Brentwood branches.
  
3. In 1983 I was promoted to Buildings Manager in Chelmsford Head Office. I was in this role for around a year. I then worked as a Customer Service Manager in the Accounts Department where I had every sort of role including Cashier, Stock Cashier, Inward and Outward revenue etc.
  
4. In 1986 I was promoted to the Post Office Head Quarters in London. I was then sent on a three-month long industrial engineer course. I obtained an Institute of Management Certificate in Work Qualification Method (an MTM2/ MTM1). These were qualifications in efficiency measurement techniques. I also received a 'Prompts' qualification which was a qualification in clerical management systems. I was then sponsored by the POCL to do Open University courses in finance, marketing and HR.
  
5. I then had a role as an Industrial Engineer where I would travel around the country as a problem solver. I worked in cash centres and call centres, dealing with cash in transit in the Post Office. I then worked on the rebranding of business units and many different aspects of the business.

6. In 1989 I was promoted to Area Manager and Counter Manager of Basildon. I was responsible for the offices of 112 Subpostmasters (SPMs) as well as 10 main branch offices. Whilst I was there I went back on the counter. There was a new system called 'ECCO' which was introduced in my absence. I learnt how this worked.
  
7. I then designed a Development Manager Training Course. I drew it up and it was then taken up nationally in around 1988/1989 by POCL National Training Department. John Roberts was very impressed with it. He was the main speaker at the end of the events. District Managers also supported these courses as well.
  
8. Between 1988 and approximately 1992 I was a Graduate Assessor for the Post Office.
  
9. Following the Post Office reorganisation, the Post Office went from 32 districts to 7 regions, where I was then an Assessor to recruit new branch managers. I travelled a lot and conducted job interviews to assess whether applicants were right for the job.

#### Horizon IT Project

10. I have been asked a number of questions relating to my involvement in the Horizon IT Project.

11. I have been asked during what period I worked on the Horizon IT Project. I was promoted to work on the Horizon IT Project in around 1995 to 1996. I stopped working on the project when I moved onto standards and conformance in around 1998 to 1999, however I cannot remember exactly when I left.
  
12. I have been asked if my job title changed during that period and if so, what to. I can't remember if my job title changed during my period working on the project, but I was the National Horizon Training Manager. I don't think anyone else in the business had a background like I did, which is probably why I got the job.
  
13. I have been asked to provide a brief summary of the work I carried out on the Horizon IT Project. I worked in a team with Ann Green (now Ann Cocker) who I knew since I was 18 as we worked on the counter together. She was a trainer and had a wealth of knowledge. I also worked with Lisa Brownsden. Our role was to agree a training course with ICL Pathway for 70,000 people. There were different categories of people who needed different training. We were also asked to develop user awareness events for 72,000 people to attend. These were the main tasks.
  
14. I have been asked if I worked with the Benefits Agency (BA). I did work with the BA. I had contact with 'Paddy' (Patrick) McGlinchey and went to his office in Belfast a lot and he came to our HQ in Victoria frequently. I saw what they wanted from a client perspective. The fraud department were

worried about whether automation gave rise to the potential for more fraud. Therefore, I worked very closely with them both (BA and the fraud department) to make sure the training course covered all they wanted.

15. I have been sent a number of documents regarding the Horizon IT project. I have been able to access some but not others.

16. I have been asked about the extent to which I can recall my involvement with the Horizon IT Project. It was a difficult project as there were two different companies with two different perspectives of what they wanted. ICL Pathway wanted proper training to be as cost effective to them as possible. From my perspective I wanted to make sure that the training was sufficiently adequate not to cause problems.

17. The user awareness events were excellent and well worth doing, although they did require a lot of time away from home. They helped placate SPMs' fears by giving them an opportunity to have a go on Horizon using training mode. The SPMs had reservations, as we all did, but they also had the rollout schedule so they knew when their office would be re-wired, and they also knew their go live dates. This did put the SPMs a little at ease, however they were still very concerned.

#### Involvement in designing the training programme

18. I am asked a number of questions relating to my involvement in the design of the training programme for Horizon.

19. I have been asked how I became involved in the design of the training programme. We (my team) became involved in the design of the training programme once we knew Peritas would be the training company. We became very close with them, and Ann Green in particular spent a significant amount of time with them looking at what we wanted to achieve and how to do it. Her intellect was beyond belief. Martin Brown, who worked at Peritas, was more at our level regarding his knowledge of Post Office issues. We worked very closely to develop the training.

20. A disagreement arose when ICL Pathway wanted to complete all the training in one day for counter clerks and one day for branch managers. We came to an impasse as we couldn't agree the length of the training. I refused to accept only one day of training for SPMs. Ann Green, who was of the same opinion as me, was not prepared to move on this. One day of training for counter clerks was not ideal but was just about manageable. However, one day for SPMs was insufficient. We had many meetings on this but in the end, we agreed to disagree. The senior management of POCL including Douglas Craik, and Liam Foley (Director of ICL Pathway) agreed to 1.5 days of training for SPMs and branch managers, but it was still only one day for counter clerks. At this meeting was myself, Douglas Craik, Bruce McNiven, Lorraine Holt and Andy Barkham (both from ICL Pathway). The managing director from Pathway also attended but I can't remember his name. Bruce McNiven was generally very sensible and he was there because I came to serious loggerheads with my opposite number at ICL Pathway. There was also someone called Barry Davies from

Pathway but I can't remember what his role was. I lost it after that that meeting and said to my bosses that it was not sufficient. I asked for it to be revisited but it wasn't. I was concerned that we would be putting insufficiently trained SPMs on the field. However, I was outvoted and was told the course would be built around 1 to 1.5 days and that was that.

21. I spent a lot of time with Judy Land to sort incorrect and incomplete cash accounts and the problems it would cause. She was the head of group in the finance division and looked after the cash and reconciliation accounts. I forewarned her of problems when the first lot of cash accounts came in. Some didn't balance and others hadn't been completed correctly. I also spent time with the fraud department to discuss the problems and fraud that may happen with automation. That was a big concern.

22. I can see the point of view of ICL Pathway but they didn't know the real root causes of why one day's training was not sufficient. I thought they should do more as I knew the problems that insufficient training was going to cause.

23. Prior to user awareness events, SPMs would contact us to find out what would happen at them. We would say they would find out at the events.

24. Another issue was that we had an age range of 16 to 89 year-olds to train. There were many over 50s who had never used a computer, but we were giving the same training to every single person expecting them to go

through it as the same pace, which was not going to happen. Peritas trainers would have known about the different age groups who would be attending the training courses. If I had seen Kevin Fletcher's comments at the time (found in "Fax from Alan Bourne to Kathryn Cook enclosing Report on Horizon System Training", document POL00039733), I would have gone to Douglas Craik and said again that there was not enough training time – however that document didn't come across my desk at the time.

25. We were receiving accounts that never balanced. I would go to Chesterfield Postal finance division, where accounts went to at the end of each week (the financial headquarters). Chesterfield reconciled the accounts, including the national accounts, and looked for any instances of fraud in pensions and other documents.

26. I have been asked about the Programme Delivery Authority (PDA), and whether I was on the Joint Benefits Agency/Post Office Board. I do not recall PDA or whether I was on the board. I was on so many different boards that I can't recall all of them. Each day I would have another board meeting.

#### Role of Peritas

27. I have been asked what Peritas Limited's role was in relation to the Horizon IT project. Peritas developed the training and user awareness course with me. I spent so much time in Stockport at Peritas' HQ it was unbelievable. Peritas worked on the project from start to finish.

28. Peritas developed and delivered the training and recruited all the trainers and people to host user awareness events. Peritas supported this with their own staff at events to answer questions. From a user awareness point of view, I can't fault them or ICL Pathway. However, from the training perspective it's difficult. We received feedback regarding certain trainers not being of the required standard and we informed Peritas who would have dismissed those trainers. I had to build confidence in the training. I wasn't happy to put it to people in a live environment without training. Ann and I worked to get that into the business.

29. I have been asked who I worked with at Peritas. I worked with Stuart Kearns who was the boss of Peritas. He was an academic and wonderful at algorithms. The contract said no SPM would travel more than 15 miles or 30 minutes for their training event, however his algorithm was a straight-line calculation and didn't take into account that travelling 15 miles meant some SPMs had to take journeys which took 45 minutes. However, all courses were booked and it was absolute nightmare to reschedule and reorganise the rollout.

30. I am asked about the working relationships between the Post Office, ICL Pathway and Peritas. I had no concerns about the working relationship. I worked initially with Lorraine Holt who was head of ICL Pathway. She was trying from day one and was very inflexible. She was removed from post and Andrew Martin came in. We then had a much better working

relationship and we did the best we could do for the time we had for the course.

### Training Needs Analysis and Competency Test

31. I have been asked about the document FUJ00001276 (which is a document titled "Training Needs Analysis for the BA/POCL Counter Automation Project by Stuart Kearns", dated 19 March 1997). This document is fine and covers all the areas we needed to cover. I don't know why it's so long but it covers all aspects of the business we needed to provide for counter clerks, SPMs, managers, auditors, investigating departments, and trainers. After rollout each office also had two weeks support from our staff who had their own training course too. I was confident it was a well-produced document.
  
32. I have been asked what the Post Office considered to be the necessary skills for a postmaster to be competent in using Horizon prior to the Training Needs Analysis. As far as I'm aware the only requirement was to attend the course. It wasn't until we introduced a competency test that we had some form of measure to see if SPMs were competent enough. I vividly remember Ann and I discussing whether we should be calling it a "competency test", as that phrase frightened her because at the end of the day people would be more worried coming to the training course if it came with a test. We thought long and hard about it but couldn't think of another term aside from "competency test".

33. Ann and I developed the test, then Kathryn Cook introduced it into the contract. I then worked with Sue Smith who was the National Post Office Training Manager and she was very good.
34. The test was introduced prior to Horizon going live when we were in process of agreeing the final draft of the training course. ICL Pathway and Peritas were on board with the test. I have seen from the documents provided that 80% passed and 20% failed. That (20%) seems quite high to me as it amounts to 14,000 people which is a huge number, but you (the Inquiry) have better stats. A member of the Inquiry's legal team asked if the 20% figure related to pre-course competency testing as set out in POL00039735. The 20% figure may have referred to pre-course testing because it seemed quite high.
35. The counter clerks competency test was pretty basic to be honest. The test involved questions such as: "Can you turn the computer on? Can you input your password? Can you carry out a postal transaction? Can you reverse a transaction? Can you add up the figures at the end of the day?" That was about it. I don't know if the SPMs failed more than the counter clerks but I would want to see the stats.

Initial design and testing of training programme

36. I have been asked about the first design for the training programme. There were different stages. The first stage was an OBSC (order book control

services) which was piloted in Bristol where we worked with BA, Peritas and ICL Pathway to develop the course. The course was for putting in a book on the system and then taking it out and transferring it to another office. It was very simple and trained staff how to book in and out. We went live with that one. For OBCS training we had SPMS, unions reps, counter clerks, franchise reps etc. – around 6 to 8 people testing the system.

37. I have been asked about who was responsible for designing and approving the training plans, courseware, session reviews and course scripts. In each case it was myself, Lorraine Holt (ICL Pathway) and Peritas. We both approved and tested all that went out. POCL agreed each part of the training plan, they didn't sign off until they were happy all was right. They were the final sign off for the training plan, and they signed off each stage too.

38. I have been asked about the testing of the initial design of the training programme. As an ex-Area Manager I knew competent staff, so I picked SPMs from my old region to test the training programme. I chose competent people who would tell the truth about whether the training was good enough. This caused friction as I ensured we had competent clerks and SPMs who knew their jobs to test the system. The people I chose to ask to test the training included my ex-wife, who was an SPM. She had no problems herself with the programme, but she pointed out many things that were not right and said the training wasn't long enough. She was an ex-

counter clerk so for her to say that adds to my sense that we should have gone further, but I wasn't listened to.

39. I have been asked if the views of SPMs were sought on the design of the training programme. They were not. We would meet with them and stand behind counters and look but we didn't ask them anything about the design. Their input was in testing the course itself – the training course we were putting forward.

40. I have been asked about a report by Kevin Fletcher titled "Horizon System Training – The First 14 – Report of practice events, dated 28 March 1999" (POL00039733). As stated in paragraph 24 above, I had not seen this report at the time. It may have been after I left in 1999 which is why I didn't see it at the time Horizon would have been live by then. If I had seen it, I would have shown it to bosses and said it shows there wasn't enough time to train SPMs and the problem was the course was too short. I moved on with Bruce McNiven to outlet standards and conformance in mid-1998 to 1999 (however, as set out in paragraph 11 above, I cannot recall exactly when I left). Ann Green took over from me then. I do not know the views of the Post Office on this report or whether they took any action as a result of it.

#### Horizon Training and Competencies Development Group

41. I have been asked about a group involving myself, Kathryn Cook, Sue Smith, Alan Bourne, Clare Dryhurst, Jeff Widdowson, John Breedon, Ann

Green and Paul Kirk. This group was formed to help with the competency side of business and how we measured success or failure. Clare Dryhurst was quality control manager. Kathryn Cook was leader and she took on board everything we were saying. I tried to get an amendment to the contract as competency training wasn't in the initial contract and it would cost ICL Pathway more money to add it in. I am sure training may have been sped through quicker than it should have been, but I can't prove it.

42. We put to ICL Pathway a solution to help us make sure people coming into the network after training were capable of using the system. Kathryn Cook passed this on to ICL Pathway who approved it.

43. I have been asked how often the group met. I don't remember how often the group met, but it was not regularly. We met once or twice. If I had a problem, I'd go to Kathryn Cook.

44. I have been asked if I considered the group was effective. The group was definitely effective in my view. There was no way I was going to sign off the course without the competency test, but I had more weight behind the request for competency training when I had senior staff's agreement.

45. I have been asked about a memorandum from Kathryn Cook 're: Horizon Training Competency and Conformance' from January 1999 (POL00039748), which said "*Most of you have been involved in the developing debate within the business about concerns over the entry level*

*of competency of those attending Horizon Training events i.e. that it may be low enough to prejudice their ability to make the most of ICL's training".* I haven't seen this document and I can't remember it. However, the concern was probably justified as my concerns were the same. There was a wide range of people going on the course, from ages 16 to 89. Some had never seen or used a computer, some went reluctantly. Lots of people didn't like or want change. I don't recall too much about it and don't think anything was done about it. I think the concerns were a given, but it was one of those things as you can't change as they were SPMs, some of whom had been there 40 to 50 years. It was never going to be possible to improve the entry level competence of the SPMs coming onto the course and we had to accept that who turned up was who we got.

46. POCL staff weren't a problem. However, once you went live, any new staff employed by the SPMs were trained by the SPMs not POCL. That diluted the quality of the training. This was another area of risk I raised to Douglas Craik and Bruce McNiven but there wasn't a solution we could afford to do. We just had to accept that there would be mistakes made by these people. I don't know how POCL became aware of this issue but we all knew about these issues.

47. I have been asked about the work of the Service Management Team to improve conformance. It sounds familiar but I couldn't tell you much about it now. There were so many different people and teams and I couldn't tell you

what they all did. I do not know how conformance was defined or what it was about.

### Competency Report

48. I have been asked about a memorandum from Kathryn Cook to Bruce McNiven dated 9 April 1999 regarding a Horizon Competency Report (POL00039735). I do not recall how the findings of this report were researched, there were lots of people on the Horizon project.
49. I have been asked about the suggestion in this report that “most problems in subpostoffices are to do with the preparation of the cash account rather than customer facing activities”. This is what frustrated me about the project. We had high level/ director level POCL staff who had never worked on a counter or worked as an SPM and who didn’t know about what happened in the Post Office, passing comment to people who did know. We had SPMs staying there until midnight trying to balance accounts. We had SPMs trying to balance on a Thursday even though they couldn’t, because the accounts had to be balanced by Wednesday. We had SPMs sending in incomplete accounts to Chesterfield. It’s why I spent so much time at Chesterfield trying to prepare them on what to expect. It was obvious to everyone with grassroots knowledge that with short training and a mix of SPMs of all ages, it was inevitable that these problems would happen.

50. I have been asked what I thought a SPM ought to be able to do at the time once they noted a discrepancy between the Horizon generated data and that actual cash and stock in branch. The SPMs had the helpline available who they could have phoned. They could also have phoned the Retail Network Manager who was their boss.

51. I have been asked what the “systems and processes” were dedicated to handling errors that the competency report refers to. Every time there was an error, Chesterfield raised what was called an error notice and it went back to the SPM to correct the accounts.

52. I have been asked what is meant in the report (POL00039735) by “we do not have a conformance culture”. I do not know. It sounds like someone being paid too much money to come up with waffle.

53. I have been asked about my views on the conclusions of the competency report. The competency test for counter clerks covered enough of the transactions they would do on the counter. It was not rocket science to pass that test. I am surprised that 20% failed (however, as set out in paragraph 34 above, the 20% figure may have referred to pre-course competency testing because it seemed quite high) but they were not fully trained so it might have been difficult. It was all new to them. They knew how to do transactions manually but they were now being asked to do it on a point-of-sale system. I don't think the competency of the clerks coming

into the course matters as they are learning something new and are being trained to be competent at something new.

54. I don't know if POCL took steps to test the conclusions of the report.

55. I have been asked if the report led to any changes to the training programme. It stayed the same while I was there. I vividly remember an 89-year-old SPM from Oxford who came and failed both her first and second competency tests. I then went on leave and came back to find out she had passed her third test and was going live. We then spent two days at her branch trying to unravel the mess her accounts were in. We tried to find out who had passed her but couldn't. The trainer would decide whether a SPM was competent or not. It was a frustrating process.

#### Changes from the initial training programme

56. I have been asked about a document called "Collection of Acceptance Incident Forms for various incidents" from 1999 (POL00028357) and various questions relating to "Acceptance Incident 218". I have not seen this document.

57. I have been asked about whether I was aware of the incident itself. I don't know when this incident was raised but I was aware of the concerns and totally agree as the concerns reflected what I'd been saying since the start. There was not enough time to train SPMs on the most important element of

their job – producing a cash account. With only one and a half days of training, we couldn't fit any more training on this in.

58. I have been told that the Inquiry has heard evidence that Acceptance Incident 218 was discussed in acceptance workshops between August and September 1999. I have been asked about my recollection of these workshops. My recollection of this is very misty and I can't remember. I was in 3 or 4 meetings every day. There was a lot going on.

59. I have been asked what changes I thought were necessary to address these concerns. I thought the training day should have been longer with a second afternoon to practice how to do a cash account. However, this was never going to happen as it would cost ICL Pathway a fortune and they weren't prepared to do so. I was outvoted on it in the end. Attendees should also have been given two or three goes at producing a cash account.

60. I have been asked about a letter from John Dicks to Bruce McNiven which mentions an email from me to Andy Barkham of 10 August 1999 referring to changes made to the Counter Manager and Counter Assistance Course. I don't recall this or remember who John Dicks was. I don't recall if any changes were made while I was there, but they might have happened after I left.

61. I have been asked about a document titled "Training and User Awareness Baseline Document version 9" (FUJ00001321). I do not recall this

document. I do not recall any changes that were made to the training programme after the Acceptance Incident was raised although I'm prepared to stand corrected.

62. I have been asked about a document called 'Horizon Testing - Key Problem Area Analysis and Action Plan' dated 27 August 1999, which describes me as a technical expert, Nancy Whittom as the business expert and Steve Grayson as the champion for Acceptance Incident 218 (POL00028342). I know both other names. I'm surprised as Steve Grayson was on the other side of the business. I don't know why he was there as he looked at the implementation and building side and changes etc.

63. I have been asked why I was selected as the technical expert. I don't recall exactly but it was probably because I was involved in the training programme from the start. However, I wouldn't call myself a technical expert and I am surprised to hear that I was called this in the document. 'Technical' is probably the wrong word and 'operational' may be a better description. I do not recall what the role involved. I'm also surprised I was still there – I was sure I'd left by then (however, as set out at paragraph 11 above, I cannot recall exactly when I left).

64. I do not recall how Acceptance Incident 218 was resolved. It was certainly not resolved in my time. The course wasn't changed to my knowledge. I don't think the counter office staff course was ever changed but it should have been.

65. I have been asked if I thought the training was satisfactory and whether it adequately trained postmasters and counter managers on how to balance. My response is no.

66. I have been asked what changes to the training programme would have been beneficial. There should have been a second afternoon to balance cash accounts. Apart from that, the course was okay. The SPMs also had two weeks support behind the counter with a specialist, helping the SPM through the first two account balances and sometimes the first three. More training could have made our lives easier in the support functions. It saved ICL Pathway a lot of money (having less training), but increased costs for POCL.

### Testing

67. I have been asked how competence in using the Horizon IT System was tested. It was the same route that tested all releases. Post Office, Union reps, counter clerks and branch managers all went through the competency tests and gave their approval. SPMs were asked about the trainers recruited by Peritas. They were given a sheet to insert their password, produce transactions for post office stamps and to reconcile the accounts etc.

68. All SPMs and staff went to relevant training courses. For example, if there were six staff to be trained, they couldn't all be released at once. Some

attended on day one, others on day two and three, and then the office went live on day four.

69. It was the role of myself, Kathryn Cook and the competency group to satisfy ourselves that the methods used to test competence were adequate.

70. I have been asked about the nature of remedial training available to SPMs who failed the competency test. SPMs simply came back for more training and to re-do the competency test, like the 89-year-old SPM from Oxford I previously mentioned in paragraph 55. This started to affect rollout plans if SPMs weren't confident the office couldn't go live and that caused a lot of logistical difficulties.

71. I have been asked how the Post Office monitored the content and adequacy of the remedial training. There were stats on retraining, but the training itself wasn't altered. It was the same training again. Perhaps they should have concentrated on areas the SPMs attending were not competent on. But it was difficult as if there were five people attending the training again there may have been five separate points of failure, so maybe it was best to do the full training again.

72. In terms of other support, as I said above, SPMs would have had the support of an expert for two to three weeks for balancing. There was none other than that, but three weeks support should have been adequate.

These experts were individuals from the Post Office who had been trained to a high standard and knew everything about the system. They were physically present to help the SPMs through the first two accounts they balanced. They stayed there for the first two weeks and if it came to a 3<sup>rd</sup> week they would go back on balancing nights. There were a fair few of these experts. I don't know the exact number, but it was considerable and enough to cover every new office for when Horizon went live there. These experts had a dedicated week-long training course and they were selected for the course based on general competencies. They would be postal officers who were very good and knew the system and transactions on Horizon well.

### Feedback

73. I have been asked what the Post Office did with feedback obtained from the SPMs. The answer is not a lot. This is my opinion because the training programme wasn't changed. I don't think we bothered listening to the SPMs to be honest. They were asked to give feedback at the end of the course which went to ICL Pathway/Peritas, but it was irrelevant what they said as nothing was done with it, and the training course wasn't going to change.
74. I can only recall generic feedback SPMs had on the training course. Most feedback complained about a lack of time and cash accounts and reversals, which were the more complex transactions that could cause

issues. We should have spent more time on that. Counter clerks would have gone to their managers with any feedback.

75. I have been asked about my further involvement in the training programme during and after rollout. I had no more involvement in its design, but I attended around 10 to 15 training courses (Ann Green attended more) and 50 to 60 user awareness events around the country to see what their quality was like. I think the user awareness events and the support from ICL Pathway and Peritas at these sessions was excellent. People turned up from the region where the session was to give local support.

#### Concluding remarks

76. I have been asked if there is anything else I wish to bring to the Chair's attention. I think the Inquiry is barking up the wrong tree by trying to blame the initial training for the errors in Horizon. We tested and tested and tested the training. The feeling was that it worked perfectly from 1997. I understand that fraudulent errors occurred in 2006-2010 but I knew nothing about them.

77. The issue was that, in my opinion, the Horizon software was not tested properly and contained glitches, so then there were errors in SPMS accounts which resulted in SPMS being incorrectly charged with fraudulent activity where they started having serious losses. I think it's highly unlikely that training given in 1997 to 1999 is the reason why SPMS started making serious losses and were accused of stealing.

78. I knew my SPMs and it should have been said to bosses "it is not right, these SPMs have been here 30 years and have not taken £35,000" etc. Auditors and senior managers should have known – their incompetence let this happen.

**Statement of Truth**

I believe the content of this statement to be true. ....

Signed:

**GRO**

Dated: 6 January 2023

**Index to First Witness Statement of Trevor Rollason**

<b>No.</b>	<b>Document Description</b>	<b>URN</b>	<b>Control Number</b>
1	Fax from Alan Bourne to Kathryn Cook enclosing Report on Horizon System Training	POL00039733	POL-0036291
2	Report on Training Programme / Training Needs Analysis v1.0	FUJ00001276	POINQ0007447F
3	Memo from Kathryn Cook to multiple recipients re: Horizon Training Competency and Conformance	POL00039748	POL-0036306
4	Letter regarding Horizon Training	POL00039735	POL-0036293
5	Collection of Acceptance Incident Forms for various incidents	POL00028357	POL-0024839
6	Training and User Awareness Baseline Document v9	FUJ00001321	POINQ0007492F
7	Horizon Testing - Key Problem Area Analysis and Action Plan, 17 November 1998	POL00028432	POL-0024914