

Friday, 20 January 2023

(10.00 am)

(Proceedings delayed)

MS KENNEDY: Good morning, Chair.

SIR WYN WILLIAMS: Good morning.

MS KENNEDY: Ms Kennedy, may I call Mrs Palmer, please.

RITA ANN PALMER (sworn)

Questioned by MS KENNEDY

Q. Could you confirm your full name, please.

A. Yes, Rita Ann Palmer.

Q. Do you have a copy of your witness statement in front of you?

A. Yes, I do.

Q. For the transcript, that is WITN05360100. If we bring up page 13 of that document, please.

A. Yes.

Q. Is that your signature there?

A. Yes, it is.

Q. Have you read through this statement recently?

A. Yes, I have.

Q. Is it true to the best of your knowledge and belief?

A. Yes.

Q. That statement is in evidence. Everything I ask you now is supplementary. Thank you very much for preparing that witness statement and for coming to give evidence

1

We had a floating reserve that would go round different Crown branch offices when they needed them cover. So I worked in Bath and Shepton and Street and different branch offices.

Q. Did you enjoy those jobs?

A. I loved it, yes.

Q. What was the accounting system like at that time?

A. It was manual. It was a pencil and a rubber. We had a daily book to put all the figures in which had to be transferred over to a weekly book and reconciled and, yes, it was a paper, a pencil, a rubber and a cup of coffee.

Q. You then became a trainer in 1997; is that right?

A. Yes.

Q. Why did you want to become a trainer?

A. I think I'd been on the counter then for about 17 years and I think -- I didn't really want to go into manager. I'd done it as relief but I didn't really enjoy it. Then there was a vacancy for a trainer in the Bristol area, and I just -- I loved the job, I loved working in the Post Office, I liked the customers, I liked the transactions, and I liked the achievement you got every week by doing a balance and proving that you'd done all your work correctly and everything. So I enjoyed that bit of it, and I just thought I wanted to help somebody

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here today.

Starting with your background, what was your background before you started working for the Post Office?

- A. I went to college and did a Private Secretary certificate, and then I went to work for the local council as a secretary, typing pool, and then I did a short spell with the Wells conservative -- working for the local conservative MP as his PA, and then I moved to the Post Office.
- Q. Your first job at Post Office Counters was as a counter clerk; is that right?
- A. Yes, it was.
- Q. Can you tell us a bit about that.
- A. Well, I did six weeks' training, classroom and being observed on the counter at a local branch office, and then went onto the counter, and I did altogether about 17 years in Wells Post Office which was my local branch. I worked on the counter and then I also did -- I covered for the -- well, he was a postmaster then, because we had the sorting office attached to the back. So the postmaster looked after the postmen and the counter at that time. So it was all one business. So I did some cover for his leave and things as well, and I also did some relief work.

2

else do it, and it was an opportunity and I took advantage of it. I enjoyed it.

- Q. Between 1997 and 2012 you had various roles within training?
- A. Yes.
- Q. You were a trainer, training manager, audit and training manager; is that right?
- A. Yes.
- Q. Can you tell us a bit about those various different roles and what they involved.
- A. Yes, I started off initially as a trainer. But with that I was supporting new subpostmasters. When they bought a post office, I would attend their branch to help them understand the transactions and how to serve customers, how to process the transactions, all the paperwork side of it and their accounting and everything. Then I did that for -- I can't recall the dates. I'm not very good with dates, so I can't recall them really. But I did that for quite a length of time, and then I think the process then was I went on to manage the team.

So I managed a team of trainers in the south-west because I'm from the south-west down, as far as Cornwall, Somerset, Devon. I also managed the team at different times for South Wales, so down as far as

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1 Carmarthen and Swansea, Cardiff and that area, and
 2 I also managed a team of trainers in the central part of
 3 the south, so sort of the like the M4/M5 corridor down,
 4 so Southampton, Portsmouth, round that way. At
 5 different times I managed those teams.

6 Then there was another -- well, there was lots of
 7 reorganisation. I had to apply for my job on several
 8 occasions, reapply for it with the different
 9 re-organisations, and then I -- when they amalgamated
 10 the training and the audits together, multi-skilling the
 11 team, I managed a team of trainer auditors then as well.

12 Q. How did you find being in that management position?

13 A. I enjoyed it -- they were really good people to work
 14 with. The teams were -- I think anybody that -- all the
 15 trainers and auditors that I've come across in the times
 16 I managed them, they always worked so hard and put
 17 themselves out. They wanted to do the best they could
 18 for the people that they were working with and work for
 19 each other. So I really enjoyed that side of it.

20 I think the only thing was that -- my favourite
 21 role was the training bit and the face-to-face with
 22 customers and working with the subpostmaster. So that
 23 was obviously any job, when you sort of like move up and
 24 you move away from the practical bits of it, it changes.

25 Q. Can you tell us a bit about the background of trainers

5

1 the process.

2 Q. You then left the Post Office in September 2016; is that
 3 right?

4 A. Yes.

5 Q. What was the Post Office culture like when you joined?

6 A. When I joined, it was just a step away from the Civil
 7 Service, sort of like, mentality in that -- I suppose
 8 the job we did then, the customer wasn't as much of
 9 a focus as doing the work and doing the transactions and
 10 the balance and that sort of side of it and, you know,
 11 as the Post Office has become more retail-focused and
 12 things, and the Government transactions have reduced,
 13 and we've got to look for new transactions, it's gone
 14 away from that sort of thing.

15 Just for an example really, when I worked on the
 16 counter, it was the days when there were separate queues
 17 and if I was going -- for my lunch hour, I would close
 18 and my queue would have to move to somebody else,
 19 whereas it generally changed after. Going forward, it
 20 changed so the focus was on the customer. So, you know,
 21 you won't leave the counter until the queue's gone.

22 But back in those days, it was very regimented and
 23 very sort of the -- like I said, it was, if you have
 24 a tea break for 15 minutes, you'd have a tea break for
 25 15 minutes. As those doing training and things like

7

1 that you managed. What kind of backgrounds did they
 2 come from? What were they like?

3 A. They -- all different backgrounds basically. I think
 4 the one thing that sort of like they all had was
 5 a motivation to support and do the best they could for
 6 the person they were training and, you know, the hours
 7 we worked, the distances we travelled, and even when,
 8 sort of like, you weren't feeling 100 per cent, they
 9 would still be there because they didn't want to let
 10 people down.

11 Q. In 2012, you moved to a Field Change Adviser role; is
 12 that right?

13 A. Yes.

14 Q. What did that involve?

15 A. That was when they started the rollout of the Network
 16 Transformation Programme. So that was visiting
 17 subpostmasters and post offices to discuss the benefits
 18 of changing to the new models, because the two new
 19 models they were bringing out was the local model and
 20 the main model. So it was sitting down and having
 21 conversations with subpostmasters. Then, once they'd
 22 agreed to change over to the new model, it was following
 23 that process through. So making sure, sort of like,
 24 taking them on that journey where their office would be
 25 having new counters installed, and right the way through

6

1 that, you didn't have tea breaks, you didn't have lunch
 2 breaks. If you are a subpostmaster and had customers
 3 and you were in a post office and there was people
 4 waiting, they got served.

5 So it was quite a change of culture really,
 6 I think.

7 Q. So, when you left, it was much more customer-focused as
 8 opposed to when you joined some years earlier?

9 A. Definitely, because the reduction in the Government
 10 transactions and the processes, we've lost, you know,
 11 sort of like, child benefits and TV licences and all
 12 that sort of -- those products. So, you know, a lot
 13 of -- part of the local and main models was looking at
 14 the retail side as well which is part of some of the job
 15 I did when a Field Change Adviser was under NT between
 16 2012 and 2016, it was also helping subpostmasters with
 17 their retail side as well, because that was getting --
 18 that was more important to fill up some more income for
 19 them because of the reduction in the Post Office
 20 transactions and products.

21 Q. Turning back to when you started as a trainer, before
 22 Horizon was introduced, what was the training like?
 23 What did it involve?

24 A. I can't really recall. Because it changed so many
 25 times, the actual length and stuff, but I think

8

1 I remember it was probably about two weeks with
 2 a subpostmaster, and then you would go back the
 3 following two Wednesdays to help them do their accounts
 4 as well. Just do -- they needed some time to, sort of
 5 like, do bits on their own as well. Because they loved
 6 you being there and holding their hand, right the way
 7 through when they started, because they didn't know what
 8 they were doing. But you had to give them some time to,
 9 sort of like, do things on their own. But then, going
 10 back on the Wednesday to do the balance with them, you
 11 could fill in any gaps and questions and help them
 12 through that process as well.

13 So I think it was two weeks and two follow-up
 14 balances initially, but that was going back to, sort of
 15 like, 2008 -- well, quite early anyway.

16 Q. If we could turn up your witness statement at
 17 paragraph 5 that's WITN-- there it is. If we could go
 18 over the page, looking at paragraph 5, you say there:

19 "When the Horizon System was introduced (I am
 20 unsure of dates) I completed my initial training on a
 21 one-week course in Leeds before the system was rolled
 22 out to the whole Network. I had some computer knowledge
 23 as I had done some evening classes at Strode College to
 24 gain qualifications in Word, Excel and PowerPoint. I
 25 had no previous knowledge of the Horizon System until

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1 manual balance, it was very easy to transpose figures or
 2 put things wrong, write things down wrong or add thing
 3 up wrong. So it took all that bit away from it. So you
 4 have actually basically a list of what stock should be
 5 there and you just ticked it off. So in that way it was
 6 easier.

7 There were different reports that had to be
 8 completed to get to that balancing process, and that was
 9 the bits that took time. But there were handouts and,
 10 sort of like, work aids to show you each process. So,
 11 if you follow it step by step, you could have done it if
 12 you didn't understand have any background at all, but it
 13 was just following it slowly step by step without any
 14 interruptions and things.

15 Q. Did you feel like you were well prepared after that
 16 training to go and train subpostmasters?

17 A. I think probably -- as prepared as I could have been.
 18 I wasn't unconfident, but it's like anything, when
 19 you're shown first, you need to get out there and see
 20 how it works in the real world and actually do it that
 21 way, and then, you know, it's from there that you build
 22 up your experience and your knowledge.

23 Q. You would have been one of the first people to deliver
 24 training -- would that have been right -- one of the
 25 initial kind of cohorts training on Horizon?

11

1 this training."

2 A. Yes.

3 Q. Can you elaborate a bit more on what that training was
 4 like when Horizon first came in.

5 A. I can't really recall the actual training as such, but
 6 I know the actual system was completely different from
 7 any sort of computers and things as well, because it was
 8 purpose built for that, and it was a case of, sort of
 9 like, going -- being shown all through all the
 10 processes, through the different screens and things like
 11 that, and getting used to it, and I know they also
 12 covered doing reversals and, you know, transaction
 13 corrections and balancing as well. But I can't remember
 14 any more detail than that about the course.

15 Q. Did you feel like it was a lot to take in at the time?

16 A. Personally, I think, because I had the knowledge of the
 17 transactions and the understanding of the background, it
 18 was basically, sort of like, putting them on to
 19 a computer and things. So that helped. I think it was
 20 much harder for somebody who didn't understand
 21 a transaction in its paper form and then trying to put
 22 it on there.

23 Q. You mentioned training on balancing. How easy did you
 24 find that?

25 A. Compared to the manual balancing, when you're doing a
 10

1 A. Well, before me would have been -- when they rolled out
 2 Horizon, there were Horizon support officers. So they
 3 actually did all the -- most of the initial training.

4 Q. But you would have been straight after that one of the
 5 first groups of people training subpostmasters after the
 6 initial --

7 A. Yes, I would have been.

8 Q. How did you find the subpostmasters that you were
 9 training? What was their perception of Horizon like at
 10 that time?

11 A. I think it -- it did depend on the individual. Some,
 12 sort of like, were looking forward to it, getting rid of
 13 the paper, the pens and all the paperwork, because it
 14 was supposed to get rid of a lot of the paperwork side
 15 of it. So for those people they were happy to look at
 16 it that way.

17 Some of the subpostmasters hadn't -- especially
 18 sort of -- and I'm not being ageist here, but some of
 19 the older people hadn't been used to using a computer or
 20 a keyboard. So they were starting from, sort of like,
 21 a really concerned area. They didn't want to put things
 22 on there and, you know, they were scared of it, really.
 23 So it's just putting people at ease and showing them how
 24 it worked.

25 Q. Can you tell us a bit about the classroom training

12

1 element.

2 A. From when Horizon was in?

3 Q. Yes. Now we're talking about when Horizon was

4 introduced.

5 A. Yes. The classroom, we had training kits. So you

6 had -- it was set up so you had, like, sort of like,

7 most of the classrooms, as far as I remember, were six

8 work units. So they would have the Horizon keyboard,

9 the terminal and the printer and everything on there,

10 and we also had dummy transactions and dummy stock and

11 cash and things.

12 So basically, over the period of training, we'd

13 start them off -- we covered, sort of like, basic, sort

14 of like, customer care and that sort of side of it as

15 well, as well as some sales. But to do the

16 transactions, we would give them dummy transactions and

17 show them how to process on Horizon. So they were

18 getting used to the key board and getting used to the

19 screens.

20 Then those transactions, we'd use those and

21 perform some balances as well to get them to have -- at

22 least go through the system and stuff as well. So we

23 would use practical materials, and we would also use --

24 give them handouts and things as well to take back to

25 their office when they go live. So they had those to

1 So, you know, it was -- it was different but

2 everybody learns differently and everybody takes

3 a little more -- some were quick to pick things up and

4 some people or slower but ...

5 Q. Did you feel that you had enough time to train

6 subpostmasters?

7 A. It depends how the time was used, because sometimes you

8 would go to an office, and a new subpostmaster, although

9 you made it clear that you needed them -- if I was going

10 to be there for two weeks, I needed them to focus on the

11 Post Office bit for that two weeks. But obviously with

12 taking over a post office and a retail, reps are coming

13 in, they know the office has changed, they will be

14 coming in, and so they would disappear and, you know,

15 you would be stood there behind the counter especially

16 -- when there was none of the customers were queueing

17 up, that was fine, because you could keep them focussed.

18 But sometimes they would appear and go and talk to the

19 card rep or the cigarette rep and stuff, not realising

20 that's important time that they needed.

21 So yes, there was never enough time and, from

22 a postmaster's point of view, they would have been --

23 they would have loved us to stay there for a month, you

24 know, and hold their hand, but it just practically

25 wouldn't work.

1 refer to.

2 Q. Then can you tell us about on-site training.

3 A. On-site training, generally they'd been to -- some had

4 been to a classroom, so had a little bit of knowledge.

5 Some subpostmasters had some knowledge because they'd

6 had previous offices, but some were coming in without

7 any experience at all.

8 So it was very much starting from scratch really

9 for some of them, and it was -- if they'd been to the

10 classroom, it was all right because at least they'd seen

11 the system stuff. So doing it from scratch was really

12 difficult. So classroom before was really important.

13 But on-site training -- I thought I was quite a good

14 trainer. In my way of doing it, I stayed back and they

15 had to do it. I can remember one subpostmaster who

16 said, "You do the first a couple of hours and I'll

17 watch." I said, "No, that's not how it works. You do

18 it and I'll stand back."

19 It took -- it takes a long time, and they're under

20 pressure because there's a queue of customers as well.

21 But generally I always found that the customers were

22 quite respectful and patient, because they appreciated

23 they were having a new subpostmaster, they appreciated

24 the Post Office was still staying, and they would be

25 patient with that person.

1 So for the majority of cases that was -- it was

2 enough time and, if it wasn't, then we could flag for

3 extra support if somebody was really struggling.

4 Q. How often did you refer people for extra support?

5 A. I can't recall, but I wouldn't have said very many

6 times.

7 Q. At one point -- you have mentioned this already -- the

8 training and auditing functions were combined in around

9 2008. If we could turn up your statement, please, again

10 it's WITN05360100, and if we could turn to page 3,

11 please, if we pick it up it says, four lines down:

12 "Personally I didn't feel that the roles of

13 trainer and auditor were appropriate to combine. There

14 are different skill sets required to train people to

15 adapt to different learning styles, whilst completing an

16 audit is more process-driven and people skills are not

17 so crucial. Some of the auditors were uncomfortable

18 delivering training and, likewise, some trainers were

19 not comfortable completing audits. It was a job role

20 change that was a business decision that we had to

21 implement but I did not feel it was a change for the

22 better."

23 Can you tell us a bit more about what you mean by

24 that.

25 A. Yes. I mean, I understand the business wanted to

1 multi-skill people because it's a better -- a better use
 2 of resource, especially when you are covering a whole
 3 country and you have got 17,000 or 11,000 post offices.
 4 So, you know, for the needs for the business it makes it
 5 more sensible. But personally some of the -- I was
 6 a manager then. So I had to -- I supported some of the
 7 auditors through learning training, learning how to
 8 train, and I supported some of the trainers learning how
 9 to audit and, for some of them, yes, they could adapt
 10 from one to another; it came naturally. But for some of
 11 them it wasn't an easy -- it wasn't an easy move, and it
 12 wasn't comfortable, because the people skills for
 13 training and actually keeping back and letting people
 14 learn in their own way is different from going in and
 15 filling in -- I don't want to take it away from an
 16 auditor but, sort of like, completing spreadsheets and
 17 figure work and things like that.

18 So I still felt it was two different skills which
 19 some people -- and, I mean, one of my auditors, when he
 20 did classroom training, was absolutely fantastic. It's
 21 something he would never have tried and never have done.
 22 So some people developed really well, but some of them
 23 it was -- they had to do it because that was the job
 24 role and they'd take it on board and they adapted. But
 25 it didn't necessarily mean they were happy and

17

1 **A.** Yes, I can't recall the specific ones, but I know I did
 2 things like, sort of like, learning styles, and then we
 3 did different courses on new products and stuff like
 4 that, sort of thing. But it was, sort of like, there
 5 was development there, you know, that was available, and
 6 you could put yourself forward for different courses as
 7 well, so ...

8 **Q.** There was never anything like: subpostmasters are
 9 struggling with balancing, let's do a top-up course on
 10 balancing for trainers, or responding to issues like
 11 that?

12 **A.** Not at that time, no. I mean, I think anything that --
 13 as a team we were very good at sharing best practice
 14 and, if anybody had any information to share, then we
 15 would share.

16 **Q.** If we could turn up NFSP00000261 and if we could turn to
 17 page 7, please, we've looked at this report a number of
 18 times in this Inquiry. Did you see this at the time?

19 **A.** No.

20 **Q.** If we could turn to page 15, please, "Training". So
 21 this was at the beginning of 2000:

22 "It was found that opinion was split on the
 23 training with 50 per cent saying that the training was
 24 goods and 50 per cent saying it was poor."

25 If we turn over the page to page 16, scrolling

19

1 comfortable doing it.

2 **Q.** Did you think it was appropriate that the same people
 3 were training as conducting audits?

4 **A.** I don't think it was inappropriate. I think you can do
 5 both, because you're not doing it at the same time, and
 6 some of it -- I think I can remember that we did -- sort
 7 of like, we would do a transfer audit, and then stay
 8 there and do the training. So, you know, there was
 9 times when it did work.

10 **Q.** So did you know people who audited people that they
 11 trained?

12 **A.** I can't recall anybody that ...

13 **Q.** Did needing to carry out audits impact on how you saw
 14 subpostmasters, if you were training them but also
 15 auditing them?

16 **A.** I don't feel it did for me. I don't think it made any
 17 difference to me.

18 **Q.** To your colleagues?

19 **A.** No, I don't think so. I can't speak for them, but
 20 I don't think it would have done, because it was like,
 21 you know, whatever role you were going in there to do,
 22 that was what you did.

23 **Q.** You attended courses during your time to up-skill. Can
 24 you tell us a bit about the courses you attended while
 25 you were a trainer to up-skill yourself.

18

1 down to "Balancing":

2 "Nearly a fifth of respondents are finding
 3 balancing using Horizon very difficult and a further
 4 quarter are finding it fairly difficult."

5 I appreciate this would have been before you
 6 started carrying out training, but did that reflect your
 7 experience?

8 **A.** Yes, it probably did. But, again, the purpose of the
 9 feedback and getting that from them is to then improve
 10 and develop what training they're getting.

11 **Q.** Did you feel like you did improve the training that they
 12 were getting?

13 **A.** I know there was -- even in the classroom we introduced
 14 more practical examples so they could -- where we
 15 probably were doing maybe one balance in a week, we'd
 16 bring in two balances, Wednesdays and Fridays, just to
 17 get them practising going through the system. So there
 18 were, sort of like, improvements ongoing.

19 **Q.** If we could take that document down, please, and go back
 20 to your statement WITN05360100, and if we could turn to
 21 page 10 of that, please, paragraph 17 scrolling down.
 22 You say at paragraph 17:

23 "In the early days I would leave my phone number
 24 [this is the second sentence] in case they got stuck but
 25 this caused problems when I was working that following

20

1 post office, so I encouraged them to use the Helpline."
 2 Can you tell us a bit more about why you gave
 3 these subpostmasters your telephone number.
 4 **A.** I think -- when you'd been with somebody for, like, two
 5 weeks and working quite close with them, you had
 6 knowledge -- part of helping them was to, sort of like,
 7 tidy the office up, put things in an order so they could
 8 find things and stuff as well. So I had knowledge of
 9 the actual offices. So, if they had a query, sometimes
 10 it would have been easier for them to call me and say,
 11 "How do I do this", or, "Where will I find this", than
 12 phone the helpline because the helpline hasn't got that
 13 local knowledge.
 14 So -- because you build up a relationship with
 15 people when you're working with them that closely as
 16 well. But then, because of the nature of the job we
 17 were doing, the following two weeks I could be busy
 18 somewhere else or not have a signal or things, and you
 19 wouldn't want them holding on just to talk to you. So
 20 it was to encourage them really to use the helpline or
 21 the Horizon Help or whatever support, you know, NBSC,
 22 whatever support was appropriate for whatever query they
 23 had.
 24 **Q.** Did you ever have someone phone you and say, "I just
 25 can't do this, I can't balance, I don't know what's

21

1 would have received; is that right?
 2 **A.** Yes. They would have been from my team members, my
 3 trainers. When they were doing obviously the passports
 4 and bureau bit, that's sort of the classroom training.
 5 So it's -- when they're in the classroom, if they had
 6 any feedback then we would feed it back, and I can take
 7 it to the review meetings.
 8 **Q.** So when it says in the right-hand column "No change",
 9 these are things that would be flagged to you, and you
 10 would consider and decide whether or not to take forward
 11 to the --
 12 **A.** Yes. No, no, this would have been after we'd gone to
 13 the -- we meet -- as field team leaders, we would meet
 14 and then discuss the feedback and the comments or
 15 suggestions from the team, and then decide whether it
 16 was appropriate to make those changes, if it was
 17 possible to make those changes, and then feed back to
 18 the team whether it was possible or not.
 19 **Q.** If we could turn up POL00033610, this is another form of
 20 feedback form, isn't it?
 21 **A.** Yes.
 22 **Q.** Do you recognise this? What does this show?
 23 **A.** Basically the insurance session in the classroom was too
 24 long. So obviously, when they're delivering it, you're
 25 getting a sense then of how well it works with the

23

1 going on but I can't" --
 2 **A.** The time I can recall was when I was going for a meal
 3 with some friends and I was in the back of a car -- it
 4 was about a 40-minute journey -- and my subpostmaster
 5 called me and he couldn't balance his lottery. So I
 6 spent that 40-minute journey talking him through it step
 7 by step to get there, but we did and it was fine. But,
 8 yes, sometimes if they've got in a pickle, it is really
 9 difficult.
 10 **Q.** Was that one of the reasons why you stopped giving your
 11 phone number; were you being bombarded?
 12 **A.** No, it wasn't that at all. No, that's not why I stopped
 13 doing it. It was mainly because it was -- I didn't want
 14 to sort of have anybody having that delay in getting
 15 help when they needed it, just because they were waiting
 16 for me to answer the phone if I was busy or working
 17 somewhere else. So yes, that wasn't why I stopped it.
 18 **Q.** You received feedback throughout your time as a trainer;
 19 is that right?
 20 **A.** Yes.
 21 **Q.** If we could turn up POL00005850, we heard from Chris
 22 Gilding that these were kind of collated feedback forms.
 23 If we turn over to page 4, Rita Kendellen.
 24 **A.** Yes, sorry.
 25 **Q.** So these are the types of feedback comments that you

22

1 postmasters in the classroom. So obviously they said,
 2 if the session was too long, so split it up and try it
 3 in a different way. Because trying to get -- trying to
 4 get the messages and the knowledge to the delegates, if
 5 it doesn't work, there's no good just keep trying it in
 6 the same way. So we would try it in a different way.
 7 **Q.** If we could turn over the page, I think this is still
 8 the feedback from your team --
 9 **A.** Yes.
 10 **Q.** -- and we can see -- I think it's the sixth box down --
 11 **A.** Yes.
 12 **Q.** It says:
 13 "Lose the one-month phone call and the PTV at the
 14 three-month stage and change it to a PTB at one month
 15 and PTA at 6 to 9-month stage."
 16 Can you tell us what's going on in that box.
 17 **A.** Yes, it's Post Office jargon, most of it. It's -- the
 18 PTC in the first box is post transfer contact. So there
 19 was a process where, following the transfer of an
 20 office, we would keep in contact with the subpostmaster
 21 to find out how things were going and help if they
 22 needed any help. So basically there was a one-month
 23 phone call. The PTV is post transfer visit. So that
 24 would be after three months. But what we were looking
 25 at there, I think, is that it would be better to visit

24

1 after the one month because then you're face-to-face
 2 and, if they have got any issues or they have got any
 3 queries, you can actually help resolve them then, and
 4 then, after three months, do a call.

5 Q. So this was a suggestion --
 6 A. Yes.
 7 Q. -- and then you evaluate it and decide practically
 8 what's best?
 9 A. Yes.
 10 Q. How often were you doing this kind of exercise?
 11 A. I think it was quarterly, but I couldn't -- I don't
 12 recall properly but I think it was quarterly reviews,
 13 I think, at the time.
 14 Q. We previously touched on audits. If we could pull up
 15 POL00033398, this is a slide show of Assurance Review,
 16 Quality of Auditing that was carried out in 2011. If we
 17 turn to page 3, we can see in the introduction that the
 18 purpose of this report is:
 19 "To document the findings, conclusions and
 20 recommendations in respect of an annual review that
 21 sought to independently assure the quality of branch
 22 auditing within Post Office."
 23 If we turn to page 6, we can see there that
 24 chapter 4 "Transfers and Conversions", you were down
 25 there as the author.

25

1 A. Yes, it is and, to be honest, I was told -- I'd had
 2 nothing else to change my mind on it -- that Horizon
 3 System was fit for purpose. So whenever I did an audit
 4 or did training, or if I was trying to find any errors
 5 or anything, I was looking for an input error, a human
 6 error or something else, and I had no reason to question
 7 that the Horizon System was wrong, and nobody ever told
 8 me any different.
 9 Q. You never had a subpostmaster saying, "It's the system,
 10 it's not me"?
 11 A. Not at all, no.
 12 Q. Were you aware of a Computer Weekly article in 2009 that
 13 raised issues with the integrity of the Horizon System?
 14 A. No, not at all.
 15 Q. So that wasn't something that was spoken, to your
 16 knowledge, at the time?
 17 A. No, no, and if I had thought there was any bugs or
 18 things in the system, my approach would be completely --
 19 would have been completely different, in that I wouldn't
 20 always be looking for the human error and for people
 21 putting wrong figures and things in. Yes, I don't --
 22 yes, it would have been completely different.
 23 Q. What about after the Panorama programme in 2015 ; do you
 24 remember people talking about that while you were still
 25 that Post Office?

27

1 A. I don't think I was the author. I was -- that was my
 2 chapter that my team would review.
 3 Q. Okay. So when it says author Rita Kendellen, that that
 4 would be your team's responsibility?
 5 A. Yes, it would be -- we had a chapter each to review on
 6 a regular basis, and then I would feed that back in,
 7 yes.
 8 Q. Can you explain how transfers and conversions fits
 9 within this framework of auditing.
 10 A. From what I remember -- we did transfer audits. So when
 11 an office was transferring to another subpostmaster,
 12 then it would be audited by one of our team with the
 13 postmaster there, so that all that was collated, and the
 14 conversions, I can't recall that, but that's probably --
 15 no, I really can't recall that bit, the conversion bit.
 16 Q. That document can come down, please.
 17 Turning back to your witness statement, if we
 18 could bring up WITN05360100 at page 12, please, looking
 19 at the bugs, errors and defects in the Horizon IT
 20 System, you say:
 21 "I was not aware of any issues or problems with
 22 the Horizon System in my time with Post Office Limited.
 23 I never heard of any issues from anyone, so there was no
 24 impact that I had to deal with."
 25 The same at paragraph 27; is that right?

26

1 A. Yes, and I did watch it.
 2 Q. Were you shocked?
 3 A. Absolutely.
 4 Q. What did people you spoke to within the Post Office
 5 think about it?
 6 A. I can't remember talking to any people within the
 7 Post Office, but personally I felt -- I suppose I felt
 8 let down and I felt really bad that I hadn't known and,
 9 you know, these terrible things had happened to people,
 10 and it wasn't anything I could have helped with.
 11 Q. If we could turn up WITN06380101, please, and if we can
 12 look that bottom email first, please. This is an email
 13 from the communications team that Post Office. It's
 14 unclear who -- it seems to be within the communications
 15 team in 2014, and it says:
 16 "You may be aware of some media coverage about the
 17 Post Office's Horizon System, relating to the contents
 18 of some of confidential documents, and this may prompt
 19 questions from postmasters you speak to. We are
 20 challenging the reporting of this matter as it implies
 21 we acknowledge there are systemic faults with Horizon.
 22 This is absolutely not the case."
 23 Looking further down, two or three lines from the
 24 bottom:
 25 "If the postmasters you speak to have specific

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1 concerns caused by the coverage, please let us know by
 2 email to ..." and then the email address.
 3 Scrolling up, we can then see that someone called
 4 Julia Marwood -- do you know who that is?
 5 **A.** I knew her from Post Office, yes.
 6 **Q.** What position did she have?
 7 **A.** I can't recall. She was head of something but I can't
 8 recall the proper title.
 9 **Q.** We can see here that she forwards the email saying:
 10 "Cascade, please. Forward media coverage on
 11 Post Office IT system:
 12 "Guys, Please make sure all your guys are on
 13 message with this as they may well get asked when in
 14 branches. It's critically important they maintain the
 15 line below and not give any personal opinions or
 16 otherwise as to the validity of HOL!"
 17 We can see that that's then, if you scroll up
 18 again, forwarded to a number of trainers.
 19 Were you aware of this email being sent at the
 20 time?
 21 **A.** No, I wasn't, because I was working for the Network
 22 Transformation team at that time.
 23 **Q.** Does it surprise you to see an email like this --
 24 **A.** It shocked me actually.
 25 **Q.** If we could turn up WITN06380102, please, and if we can
 29

1 **A.** Yes.
 2 **Q.** No-one was saying at this time, "You've got to get your
 3 consistent public line correct", to you, about what you
 4 thought about the Horizon System?
 5 **A.** No, I think -- because I was on a different team then,
 6 I wasn't included in any of this, and even -- I mean,
 7 I would have still been in touch with some of these
 8 people, but nobody -- I didn't have any inkling of that
 9 at all, and I had no knowledge of it.
 10 **Q.** Thank you. Those are all the questions that I have,
 11 Mrs Palmer, but, Chair, do you have any questions at
 12 this time?
 13 **SIR WYN WILLIAMS:** No, thank you very much.
 14 **MS KENNEDY:** I believe Mr Jacobs has some questions.
 15 **Questioned by MR JACOBS**
 16 **Q.** Thank you, sir.
 17 Mrs Palmer, good morning. I represent 156
 18 subpostmasters, managers and assistants who Howe+Co act
 19 for. I have some questions for you about what you say
 20 in your statement about resolution of disputes. Could
 21 we turn to page 12 of 15 of your statement paragraph 31.
 22 That's WITN05360100. Right at the bottom there you say
 23 that you were never aware of any contact or input by
 24 Fujitsu in any disputes; is that right?
 25 **A.** Yes, it is.

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1 go to the bottom of that first page, this is in 2015 and
 2 this is an email following up from the BBC's Panorama
 3 programme saying:
 4 "I wanted to send a short update on the plans by
 5 BBC Panorama to broadcast a programme about the
 6 Post Office and its Horizon System on Monday.
 7 "We have spent a great deal of the week dealing
 8 with this issue, and making our position clear to the
 9 BBC at very senior levels. We do expect, however, that
 10 the programme will include a number of unsubstantiated
 11 allegations. We have decided against being interviewed
 12 as part of the programme and have instead issued
 13 a robust statement. This was a very carefully
 14 considered decision but the programme wanted us to speak
 15 publicly about individual cases, and we're not prepared
 16 to break the confidentiality commitments we have given
 17 about these. Whilst it is difficult to take this
 18 position in the face of untrue claims being made in
 19 public, we believe it is the right one."
 20 If we scroll up again, and a little bit more, we
 21 can see that this was then forwarded again to, I think,
 22 a wide array of trainers. Do you recognise any of the
 23 names on that email?
 24 **A.** Some of the names I recognise as being trainers, yes.
 25 **Q.** Do you find this email shocking?
 30

1 **Q.** Were you aware that Fujitsu held audit data which
 2 contained a complete and accurate record of all actions
 3 performed by subpostmaster, manager or assistant when
 4 they were using the Horizon System? Is that
 5 something --
 6 **A.** No, I wasn't aware of that at all.
 7 **Q.** Again, I have to ask you: did you know -- I imagine that
 8 your answer is going to be no because you have answered
 9 no to the first question -- did you know that the
 10 Post Office had a contractual right to request audit
 11 data from Fujitsu to ascertain exactly what keys on the
 12 Horizon System had been pressed at any given time?
 13 **A.** No, I didn't.
 14 **Q.** Now, you were a field team leader who led audits; is
 15 that right?
 16 **A.** Yes.
 17 **Q.** Do you think now looking back that is something that you
 18 really should have known about?
 19 **A.** Yes. To be honest, that would have probably helped when
 20 you were looking for discrepancies as well, if we could
 21 have got all that knowledge.
 22 **Q.** To the best of your knowledge, did the contracts
 23 managers with whom you worked know about this?
 24 **A.** I don't think -- well, I can't say they did or didn't.
 25 I wouldn't -- I don't know.

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1 Q. But you weren't aware?
 2 A. No, I weren't aware of it, no.
 3 Q. You say at paragraph 33 of your statement -- this is
 4 moving on to page 13 of 15, perhaps if we could just
 5 share that so we can see it. You say:
 6 "As an auditor, it was difficult to identify
 7 errors that had occurred in the past as the
 8 documentation wasn't always available and the systems
 9 didn't go back far enough."
 10 A. Yes.
 11 Q. In the light of what we have just been talking about, do
 12 you accept there actually was a means by which these
 13 investigations could have been carried out fairly?
 14 A. Yes. When we did an audit and you couldn't or you were
 15 trying to help find a loss or discrepancy, if the system
 16 didn't go back far enough, we would then refer it back
 17 to Chesterfield because, as far as we understood, they
 18 could go back further than we could go on-site. But
 19 apart from that, yes, I didn't know anymore.
 20 Q. You also say at paragraph 33 that you had every faith
 21 that the system was working as it should --
 22 A. Yes.
 23 Q. -- and when errors occurred it was down to human error?
 24 A. Yes.
 25 Q. I think you have also said this morning, haven't you,

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1 my subpostmasters and, you know, you just feel, like,
 2 awful.
 3 Q. We've seen the email that Ms Kennedy put up on the
 4 screen --
 5 A. Yes.
 6 Q. -- that Post Office sent out in relation to the Panorama
 7 programme. Are you able to say, and you may not be able
 8 to say, but why do you think Post Office weren't being
 9 open about all this?
 10 A. I really don't understand why not. I think -- no, I
 11 just -- I can't understand it. I know that the size of
 12 the business and -- one of the very first things we used
 13 to cover on the classroom course was the fact that the
 14 Post Office was one of the most trusted brands and
 15 that -- you know, that was what we were telling people
 16 that were buying a business and putting their money into
 17 it and that was, you know, they were buying into the
 18 Post Office because it was one of the most trusted
 19 brands in the country.
 20 Q. What do you think about that now?
 21 A. I'll don't like to comment to that, sorry.
 22 Q. Thank you. I am just going to ask Mr Hull if I have any
 23 further questions. No, I haven't. That's it. Thank
 24 you very much.
 25 A. You're welcome.

35

1 that whenever you did audits, because of this belief you
 2 had, you were looking for human error or something else?
 3 A. Yes.
 4 Q. And you were shocked when you saw the Panorama
 5 programme?
 6 A. Definitely yes, I was.
 7 Q. Was this view, that when errors occurred it was down to
 8 human error, was that a view that was shared by your
 9 colleagues?
 10 A. I can't speak for anybody else, but I think that was --
 11 the general approach was the first thing you go and look
 12 for is either something that had been input to the
 13 system wrong or something they put as a deposit instead
 14 of a withdrawal, or there would be something physical
 15 that you could actually see had been put in by error,
 16 yes.
 17 Q. Now, again, at paragraph 33 you say that you:
 18 "... feel the Post Office should have been open
 19 when they discovered faults" --
 20 A. Yes.
 21 Q. -- "as they made everyone involved feel absolutely
 22 stupid and rotten through no fault of their own."
 23 A. Well, that's what I felt when that Panorama programme
 24 came out because, you know, I'd done my best all the
 25 time I worked for Post Office to do the best I could for

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1 **MR JACOBS:** Thank you, sir.
 2 **SIR WYN WILLIAMS:** Is that it?
 3 **MS KENNEDY:** Yes, Chair.
 4 **SIR WYN WILLIAMS:** Thank you very much, Mrs Palmer, for
 5 coming to give evidence to the Inquiry and for the
 6 straightforward nature of your answers, if I may say so.
 7 Thank you very much.
 8 A. Thank you.
 9 **MS KENNEDY:** Chair, unfortunately Mr Rollason still hasn't
 10 received his equipment. We are looking at alternative
 11 arrangements but unfortunately we won't be able to sit
 12 for the rest of the day and hear his evidence.
 13 **SIR WYN WILLIAMS:** That's confirmed, is it, Ms Kennedy?
 14 There's no point in us waiting for 30 minutes or even an
 15 hour just to see what happens?
 16 **MS KENNEDY:** I believe the most we have been told is that he
 17 may get it by 6.00 pm, so I don't propose we sit then.
 18 **SIR WYN WILLIAMS:** Even allowing for the best will in the
 19 world, I don't think we want to start evidence that late
 20 on a Friday.
 21 **MS KENNEDY:** Chair, the other point to note is that we aim
 22 to publish the timetable for the rest of the Phase 3
 23 hearings by Monday.
 24 **SIR WYN WILLIAMS:** That's fine, thank you. All right.
 25 Well, we're now going to have a reasonably substantial

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1 break in the hearings, are we not?
 2 **MS KENNEDY:** Yes, though the alternative arrangements team
 3 Mr Rollason's evidence may mean that we might try and do
 4 something sooner than the break. But, yes, other than
 5 that, yes.
 6 **SIR WYN WILLIAMS:** Subject to Mr Rollason, we are going to
 7 have a few weeks' break in the Inquiry. It's not ideal
 8 that this is happening -- and I'm now not speaking to
 9 you, Ms Kennedy, but generally -- but this is a function
 10 of us having to be accommodated as and when we can at
 11 the moment at the Dispute Resolution Centre and I'm
 12 reasonably hopeful that over the coming weeks we will
 13 find ourselves a permanent place where there will be
 14 less possibly of disruption to the hearings as we're
 15 going forward.
 16 But, be that as it may, I'm sorry that there will
 17 be this few weeks' break in the hearing of evidence but
 18 no doubt no-one will be surprised to hear that myself
 19 and the Inquiry team will have lots to do during that
 20 period.
 21 So I'll see you in a few weeks, everyone.
 22 Goodbye.

23 **(10.54 am)**

24 **(A short break)**

25 37

1 I'm going to start, Mr Rollason. You joined the
 2 Post Office from school in 1974; is that right?
 3 **A.** That's correct, yes.
 4 **Q.** You worked as a counter clerk and then acting branch
 5 manager?
 6 **A.** Yes, I did.
 7 **Q.** You held various roles before being promoted to the
 8 Post Office headquarters?
 9 **A.** That's correct.
 10 **Q.** At the headquarters you again held various roles such
 11 area and counter manager in Basildon?
 12 **A.** That wasn't the headquarters; that was at the district
 13 office. At headquarters I did operational efficiency,
 14 industrial engineering work, and then I was promoted to
 15 area manager at the Colchester district office.
 16 **Q.** Thank you. In those early experiences, to what extent
 17 were you familiar with cash account balancing and using
 18 pre-Horizon Systems?
 19 **A.** Very familiar, very familiar.
 20 **Q.** How familiar were others who worked in the headquarters
 21 with those processes, such as the management?
 22 **A.** Sorry, you're getting it slightly confused. You are
 23 talking about headquarters or you're talking about the
 24 Horizon project?
 25 **Q.** So, when you were working on the Horizon project, you

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1 **(12.00 pm)**
 2 **MR BLAKE:** Thank you very much, sir. We have resumed and
 3 we're going to hear from Mr Rollason.
 4 **SIR WYN WILLIAMS:** Fine.
 5 **TREVOR ROLLASON,(affirmed)**
 6 **Questioned by MR BLAKE**
 7 **Q.** Thank you very much. Can you give your full name,
 8 please.
 9 **A.** Trevor Rollason.
 10 **Q.** Mr Rollason, thank you very much for joining us today
 11 and apologies for the difficulties with transporting the
 12 equipment to you. We're grateful that you've joined us
 13 from abroad today.
 14 Do you have in front of you a copy of your witness
 15 statement dated 16 January?
 16 **A.** Yes.
 17 **Q.** Can you look at the final page of that document, page 25
 18 of 26, it has there a statement of truth. Is that your
 19 signature at the bottom?
 20 **A.** That my signature, yes.
 21 **Q.** Can you confirm that that statement dated 6 January is
 22 true to the best of your knowledge and belief?
 23 **A.** It is.
 24 **Q.** For the purpose of the transcript, the statement is
 25 WITN05240100.

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1 have said that you were familiar with cash account
 2 balancing and using pre-Horizon systems because of your
 3 previous experiences. To what extent were those who you
 4 worked with, particularly in management roles, familiar
 5 with things like cash account balancing and using the
 6 pre-Horizon systems?
 7 **A.** Oh, are you talking about my immediate managers or the
 8 staff that I had work for me?
 9 **Q.** Let's start with your immediate managers.
 10 **A.** My immediate managers were ex-district managers,
 11 regional managers, probably direct graduate entrants,
 12 but they will have known the business reasonably well,
 13 I would have thought.
 14 **Q.** And who was your direct manager?
 15 **A.** Douglas Craik.
 16 **Q.** From your experience further up in the business within
 17 the Post Office, so management level, senior management
 18 level of Post Office, how familiar from your own
 19 experiences were they with those processes?
 20 **A.** I would have thought certainly Bruce McNiven would have
 21 known most of those processes. I don't know whether
 22 Dave Miller would have had the detail that we had, but
 23 he would certainly have been aware of how a sub-office
 24 worked. Whether he knew the detail of the cash account,
 25 I couldn't say for sure.

40

1 Q. Thank you. The most relevant role that you held for the
2 purposes of today was the National Horizon Training
3 Manager from 1995; is that right?
4 A. Yes.
5 Q. So that's quite early on in the project. Looking at
6 contemporaneous documents, it seems as though you were
7 at least receiving documents relating to Horizon into
8 1999. Do you remember that at all?
9 A. This is something I've said to you already. I think
10 late '99 was probably when I left the project, maybe
11 just into 2000. I saw my name on several documents in
12 '99, so yes.
13 Q. You have said in your statement your role was to agree
14 a training course with ICL Pathway for 70,000 people.
15 A. Not one training course, a number of different training
16 courses for 70,000 people in total, yes.
17 Q. Did that cover, for example, managers, assistants,
18 counter clerks; was it a broad range of --
19 A. Absolutely. It covered auditors, investigation,
20 trainers, postmasters, branch managers, counter clerk --
21 it covered a whole range of different people within the
22 business.
23 Q. I want to start today with an overview of your concerns
24 that you've expressed in your witness statement
25 regarding the training that was available. You have

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1 A. At the time it was a lady called Lorraine Holt, and then
2 it became Andy Barkham -- I think it was Andy Barkham
3 who took over after she moved.
4 Q. Can you tell us: what was their view as to the length of
5 time that was appropriate for a training course?
6 A. At the time they obviously wanted to start with
7 classroom -- not classroom -- workbooks sent out, so
8 distant learning. That was never going to work. Then
9 they came back to me. The final offer, as it was then,
10 was for one day for all subpostmasters, branch managers
11 and counter assistants, and I just wouldn't agree it.
12 It came to an impasse that we had to call a meeting
13 between Douglas Craik, Bruce McNiven and myself from
14 Post Office Counters. Liam Foley, Lorraine Holt,
15 Barry -- Barry someone was there, and I think the
16 managing director of ICL Pathway came along.
17 At the end of that meeting we had to come up with
18 a solution to move forward on how long we were going to
19 have to train. My view was that subpostmasters needed
20 at least two days. The second half should have been
21 working on the cash account, error reversals, et cetera,
22 et cetera. But at the end we had to reach a compromise,
23 and we accepted that one-and-a-half days was what we had
24 to work with for branch managers and subpostmasters, and
25 one day for counter clerks.

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1 made very clear in your statement that, although you
2 considered user awareness events to have been excellent,
3 you consider that the training itself should have been
4 longer. Can you summarise for us what made you reach
5 that conclusion.
6 A. You've got 70,000 people. They're not all
7 subpostmasters, but you have got an age range of 87 down
8 to 16. You've got those people that had never used
9 technology, you've got those people who feared
10 technology, those people who embrace technology. So you
11 had a whole range of people, and whatever you try and
12 do -- and I did hear somebody say about trying to
13 profile the resource that we had, which would just have
14 been impossible to try and profile our resource -- you
15 were going to have people on these courses who had IT
16 knowledge, who were trained by the Post Office, and you
17 were going to know postmasters and their staff on the
18 game source, and it was going to cause problems because
19 they work at different speeds.
20 I've been thinking a lot about this, and I know
21 that we ended up -- because I came to an impasse with my
22 opposite number in Pathway because they wanted to do
23 just the one-day course and --
24 Q. Can you tell us, just pausing there, who was your
25 opposite number.

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1 Now, if you ask me today, I think Bruce was right
2 in saying that one day for the assistants was enough,
3 one-and-a-half days for branch office staff was enough,
4 but one-and-a-half days for postmasters was not enough,
5 and they should have had the extra half day doing cash
6 account, more cash account work.
7 Q. Can you give us an indication of when this discussion
8 took place.
9 A. I can't. I can't remember exactly when it took place,
10 no.
11 Q. I'll take you through some documents and, if while I'm
12 taking you through those documents that's gives you a
13 better indication of the period of time, please do say
14 so.
15 A. It was certainly before Peritas were involved in terms
16 of the training, because they were waiting for the
17 outcome of how long they would have to build the
18 training around. I can't honestly remember exactly when
19 it was.
20 Q. Can you tell me how high up within the Post Office you
21 raised concerns about the length of training.
22 A. Certainly Deputy Director level.
23 Q. Who was that?
24 A. That was Bruce McNiven and Douglas Craik as well. I
25 raised it with them.

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1 Q. And what was their response?
 2 A. My main concern about the lack of cash account training
 3 was the knock-on effect of when we went into a live
 4 environment on transactional TIP, I think it was called,
 5 in Chesterfield, and all cash accounts going there and
 6 obviously the increase in error notices. I could see
 7 that was going to happen, but it was very difficult to
 8 get my point of view over.
 9 Q. You've said at paragraph 59 of your witness statement
 10 that you were outvoted. Can you tell us what you meant
 11 by that.
 12 A. Well, Bruce and Douglas, they were my senior managers,
 13 and they said, "Well, we will work with one-and-a-half
 14 days", and I wasn't going to go against them, I had to
 15 agree with them. So we did, and we had to build
 16 a course the best we could for one-and-a-half days and
 17 one day.
 18 Q. What do you recall of the view of ICL or Peritas at that
 19 time regarding the length of training?
 20 A. Well, ICL obviously were not happy to have to extend it
 21 because of the additional cost to them. Peritas didn't
 22 quite know what the time was going to be anyway. It
 23 wasn't until we passed that information that we were
 24 going to try and build these courses up between
 25 one-and-a-half days and one day that they actually got
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1 not to my knowledge. It might have changed after I left
 2 but up, until I had left, we still had the same course
 3 that we signed off.
 4 Q. How did you feel about that at the time?
 5 A. To be honest, what's the point in having a feedback form
 6 if you don't actually take notice of what's being said?
 7 Sometimes what was said you couldn't have changed
 8 anyway, but sometimes there may have been some relevant
 9 points, like we need some more time on cash account
 10 training.
 11 Q. I'm going to take you through some documents
 12 chronologically and, as I say, if that jogs your memory
 13 in terms of the various discussions you had, let me
 14 know. The first document I am going to take you to is
 15 from 7 January 1999. That is POL00039749. This is
 16 a letter from or a note from Bruce McNiven to RGMs. Can
 17 you tell us who RGMs were.
 18 A. Yes, the regional general managers.
 19 Q. What was the role of a regional general manager?
 20 A. There was seven of them across the country, and they
 21 looked after the whole network of post offices within
 22 their catchment area. They were the top man or woman in
 23 the region.
 24 Q. Thank you. You're copied into this note. Is this
 25 something you remember? I'm going to read to you the
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1 really involved in the detail of the courses.
 2 Q. I'm going to move on to the issue of feedback. You've
 3 also made clear in your witness statement at
 4 paragraph 73 that you didn't think that the Post Office
 5 were bothered listening to subpostmasters. Why did you
 6 think that was?
 7 A. Bothered -- can you --
 8 Q. Absolutely. If we could bring your witness statement on
 9 screen and we can have a look at paragraph 73, it's
 10 page 23 and if we scroll down to paragraph 73. You say
 11 there:
 12 "I've been asked what Post Office did with
 13 feedback obtained from the subpostmasters. The answer
 14 is not a lot. This is my opinion because the training
 15 programme wasn't changed. I don't think we bothered
 16 listening to the subpostmasters, to be honest. They
 17 were asked to give feedback at the end of the course
 18 which went to ICL the Pathway/Peritas, but it was
 19 irrelevant what they said as nothing was done with it
 20 and the training course wasn't going to change."
 21 A. Yes, that's right. Yes, they all completed feedback
 22 forms at the end of the course, but I don't think --
 23 certainly in Post Office, I don't recall us doing
 24 anything with the feedback, and we certainly didn't
 25 modify the course, after it was initially signed off --
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1 first two paragraphs. I'll read the paragraphs and you
 2 can let me know if you recall this issue. It starts to
 3 say:
 4 "Training courses for 64,000 of the 72,000 target
 5 audience had been agreed in principle. This includes
 6 the managers course which will be aimed at branch
 7 managers and subpostmasters, together with other staff
 8 who complete the cash account, and the basic training
 9 course for sub-office assistants. Currently, however,
 10 we have not reached agreement on how to deliver training
 11 to an estimated audience of approximately 8,000
 12 comprising at least 6,500 counter clerks and upwards of
 13 1,600 franchise staff who operate ECCO+.
 14 "Clearly the training is not aimed at teaching
 15 people how to complete a cash account, which is an
 16 assumed competence of those attending the courses, but
 17 the conversion to the automated version is more complex
 18 than originally envisaged. The gap is approximately two
 19 hours of training which cannot be added to the one-day
 20 event."
 21 Is this a discussion that you remember at all?
 22 A. No, I don't, absolutely not.
 23 Q. The reference there to the automated version being more
 24 complex than originally envisaged, is that something
 25 that you remember?
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1 A. No.

2 Q. Not as expressed in this particular note but, in

3 general, was it that the automated version was more

4 complex than you or your colleagues originally thought

5 it was going to be?

6 A. I don't believe it was, no, I really don't. I'm looking

7 at this now, the second half of the first paragraph:

8 "Currently, however, we have not reached agreement

9 on how to deliver training to an estimated audience of

10 8,000 comprising at least 6,500 counter clerks and up to

11 1,600 franchise."

12 Well, that's not true; we had. It was the same

13 course as what all branch managers and subpostmasters

14 and all counter clerks had.

15 Q. So might it have been that in January of 1999 formal

16 agreement hadn't been reached as far as counter clerks

17 and franchise staff were concerned?

18 A. But they weren't treated separately; they were all

19 treated as part of -- it's 70,000 actually, not 72,

20 because 72 was the target for user awareness, but it was

21 70,000 for the training. But they were all treated the

22 same. I don't remember seeing this document, this

23 letter, even though I was copied in on it.

24 Q. Thank you. If we scroll down, it talks about different

25 alternatives that could be undertaken by counter clerks,

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1 saying.

2 Q. So, if you were raising with Bruce McNiven and others,

3 for example, that you thought it should be

4 a day-and-a-half, why did you understand there to have

5 been resistance on had Post Office side to extending the

6 training?

7 A. I don't believe there was resistance on the Post Office

8 side really.

9 Q. So, to the best of your recollection, why didn't

10 Post Office push for more training?

11 A. Well, I did, but we had to compromise at a meeting.

12 Otherwise we'd never have moved forward with a training

13 programme, and that's what it came to. We came to that

14 impasse with Pathway, and that's why that meeting was

15 held to find an agreeable way forward. Whether it was

16 the right way or not is debatable, but we had to come to

17 some agreement to work with to get the course moving.

18 Q. So, where you say you were overruled by those senior to

19 you, or outvoted, et cetera, is it that they were

20 seeking to agree a compromise, whereas you wanted what

21 you considered to be the best solution?

22 A. I think so. I think they were looking at some way of

23 moving this forward and, like I said earlier, I do

24 believe that they probably got the majority of that

25 decision right. The part that they never got right, in

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1 one option being that they attend managers course, and

2 it has various concerns there and costs. If we scroll

3 down, it has another option, 8,000 individuals attending

4 a one-day course, et cetera, and it gives a costing

5 there.

6 This gives various costings throughout this

7 document. Not basing your recollection on this document

8 at all but just in general, to the best of your

9 recollection, to what extent did the cost of training

10 impact on the amount of time that was agreed?

11 A. I think you need to ask ICL Pathway that because

12 obviously, being a Private Finance Initiative, it will

13 be a cost to them.

14 Q. So was the cost a concern for the Post Office at all, to

15 the best of your recollection?

16 A. No, not to my knowledge -- not a cost that was delivered

17 by ICL Pathway, no.

18 Q. So, if it didn't impact the Post Office on cost, why was

19 there resistance to extending the time period for

20 training to one-and-a-half days?

21 A. Because it impacted ICL Pathway, not the Post Office.

22 We would like to have had -- I'm sure if we could have

23 got four days/five days' training we would have happily

24 had that, but obviously, if it's a Private Finance

25 Initiative, you have to listen to what your partner's

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1 my opinion, was we should have given subpostmasters

2 a separate extra half a day on cash account. But that

3 wasn't to be.

4 Q. I'm going to move on couple of months to March 1999, and

5 can we look at POL00039733. If we can go over the page,

6 please, were you aware of ICL Pathway receiving feedback

7 during this period?

8 A. Yes.

9 Q. I think this is a document you saw in preparing your

10 witness statement.

11 A. Yes. They would have got fed back definitely.

12 Q. Were you aware at the time that this feedback was taking

13 place?

14 A. Yes, yes.

15 Q. There are in this document concerns raised about the

16 lack of training in respect balancing and also

17 insufficient time being allocated to training. I'd like

18 to just give you a flavour of that. I think you have

19 had an opportunity to look at this, but let's just look

20 at page 12 just to give a flavour.

21 This is an event that took place on 8 and 9 March

22 involving Birmingham counter managers. I'll just read

23 the first few entries there, if we could scroll down

24 slightly. The first one refers to stock units, more

25 time. Then it says:

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1 "Concerned. I feel if you're not careful in the
2 accounting aspects of Horizon you might find yourself in
3 trouble. You need to know what you're doing. More time
4 needed on the balancing procedure. Sped through a lot
5 of information and the course quite intense. Balancing
6 (more time). Pretty confident with day-to-day work and
7 procedures. Still confused over the balance in relation
8 to comparing what I do at present", et cetera.

9 Were those issues being communicated to you by ICL
10 at that time?

11 **A.** Yes, we met quite often, but Birmingham counter
12 managers -- I'm assuming from that you mean the
13 Post Office-trained managers?

14 **Q.** No, if we look back at the beginning of this document,
15 page 2, this was the trial of the training. It was
16 involving the first 14, and there was a group -- there
17 were different groups around the country that ICL looked
18 at training and receiving feedback back on. So that is
19 the feedback that was provided by some Birmingham
20 training.

21 **A.** Yes, but I'd need to know a breakdown of who those
22 people were because I'd be very surprised if they were
23 ECCO+ trained branch managers who were finding it
24 difficult to operate the Horizon System -- very
25 surprised. It may have been subpostmasters. If that's

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1 due to deficiencies in the accounting modules. In the
2 live environment the training given did not equip the
3 users to perform the completion of office cash accounts.
4 This is a basis [I think it means basic] POCL function
5 that is central to running and accounting for the POCL
6 network."

7 So this is the Post Office raising with ICL an
8 Acceptance Incident that is essentially saying in the
9 live environment that the training given didn't equip
10 users to perform the completion of cash office accounts.
11 Is that something that you remember, even if you don't
12 remember the particular nuances of Acceptance Incident
13 218?

14 **A.** Possibly. It's very difficult to remember. This was --
15 was this live trial or ...?

16 **Q.** This would have been -- yes, there would have been
17 a small number of a relatively small number of outlets
18 that had received Horizon by this time in May 1999.

19 **A.** I really can't recollect that at all. I know that, when
20 we did model office testing, any issues that came up,
21 a corrective action was taken to ensure that we did have
22 sufficient time -- well, not sufficient time, but we did
23 cover how to produce a cash account. But I can't
24 remember this.

25 **Q.** If we turn perhaps to page 7 of this document, we see

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1 them passing the comment, then I understand that.

2 **Q.** Yes. So these are counter managers in Birmingham. You
3 find that surprising?

4 **A.** If they're Post Office employees, I do, yes.

5 **Q.** If they were subpostmasters -- if the training was for
6 subpostmasters in the early days of Horizon, and the
7 feedback was that the length of time taken is
8 insufficient, and that there is insufficient training
9 with regards to balancing, would that have surprised
10 you?

11 **A.** No, it wouldn't have surprised me.

12 **Q.** Was it consistent with your own experience?

13 **A.** Yes, absolutely.

14 **Q.** Two months later we have something that we know as
15 Acceptance Incident 218. In your statement I think
16 you've said you can't remember very much about that
17 incident, but I'll take you to a document to see if it
18 brings back any particular memories. That's
19 POL00090478.

20 Can we look, please, at page 4 of that. So this
21 describes Acceptance Incident 218, and it has a date
22 observed there in the right-hand corner as 19 May 1999.
23 The description of that incident is as follows. It
24 says:

25 "The managers' training course is not acceptable

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1 there a letter to John Dicks of ICL Pathway from Bruce
2 McNiven, and it concerns a review of Acceptance Incident
3 218. If we move on to page 11, he has highlighted the
4 certain concerns that still exist as at the date of his
5 letter. So his letter there is 10 August 1999, and I'm
6 just going to read to you this paragraph. It says:

7 "Although the small sample size of 18 responses
8 limits the validity of the findings, some significant
9 improvements were found in comparison to live trial 1
10 ... Overall attitudes towards Horizon are better than
11 LT2 offices compared to the LT1 experience."

12 So that gives you an indication of the time.

13 **A.** Yes.

14 **Q.** "The key outstanding issues to emerge from research were
15 as follows."

16 It lists there:

17 "The course is still considered to be too short
18 and intensive. ICL have proposed a pre-training course
19 but details are awaited. The need to further stream the
20 training groups. This issue has not been addressed by
21 Pathway beyond the streaming required by POCL for ECCO+
22 staff. Pathway's response is to do whatever possible.
23 There were impacts on the number of training places."

24 The next entry:

25 "Variation in training quality. Discussions

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1 taking place between POCL and ICL Pathway to look at how
2 there can be a greater quality assurance for trainer
3 ability and consistency of delivering the course
4 specification. There are significant problems with
5 technical and software faults in the training sessions.
6 POCL regard these are significant issues which will
7 require rectification."

8 Were those concerns that you recall at all?

9 **A.** All valid points. I recall all of those points, and
10 I remember listening to Kevin Fletcher say that they had
11 somewhere in the region of 250 trainers coming out, and
12 I went to many training courses, and we were not happy
13 with a number of their trainers, and this was passed on
14 to Pathway, and I believe that Pathway did speak to
15 Peritas, and either more training was given to those
16 trainers or they were removed from the project
17 programme.

18 As for, "ICL had proposed a pre-training course",
19 that's new to me. I don't remember ICL proposing
20 a pre-training course, but "details awaited", so may
21 have been they didn't pursue that.

22 **Q.** If we look at that first bullet point and that first
23 sentence, "The course is still considered to be too
24 short and intensive", in the summer -- so August 1999 --
25 was that view that you shared?

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1 training should now be closed. Pathway does not accept
2 that any further revisions to the training courses,
3 other than routine minor improvements already
4 identified, are required or indeed are now desirable in
5 light of the commitments made by both parties to revised
6 courses and collateral."

7 **A.** Yes.

8 **Q.** Do you remember during this period -- so the summer of
9 1999 -- there being essentially a decision that there
10 would be no extension, for example, of time for that
11 managers' course?

12 **A.** Yes, I do remember it was. There was lots of other
13 things done in the interim to support the training.
14 There was eight different workbooks, I think, were
15 produced, quick reference guides. We had the HFSSOs
16 allowed to support when they went live.

17 **Q.** That's the Horizon Field Support Officers?

18 **A.** Field Support Officers, sorry, yes. The Horizon
19 Field -- they were there, I think, for the first week,
20 maybe the second week, certainly for two balances or if
21 needed three balances. So almost like holding the hands
22 of the subpostmasters or subpostmistresses to take them
23 through the transition from a manual system to an
24 automated platform.

25 So there was -- it wasn't just about the training,

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1 **A.** Absolutely. My view never changed from when we agreed
2 to go towards the one-and-a-half days. All we could do,
3 my team could do, is to make sure that we -- I basically
4 say crammed as much information as we could into the
5 time we had.

6 **Q.** If we go over the page, this is a response to Bruce
7 McNiven from John Dicks in August, 11 August 1999.
8 I won't spend much time on it because you don't really
9 recall much about the Acceptance Incident. I'll just
10 see if this jogs any memories. This is a response that
11 says:

12 "Pathway is convinced that it has done everything
13 it can to improve the training and prepare for Horizon,
14 and that the essence of the remaining issues we are
15 seeking to address relate to POCL's own management of
16 change."

17 Moving to the next paragraph, it says:

18 "Pathway has consistently maintained that user
19 confidence in the system will be achieved only through
20 managing the change in POCL business processes such that
21 POCL's target standard approach is adopted across the
22 Post Office network."

23 Next paragraph:

24 "For these reasons, Pathway believes that
25 Acceptance Incident 218 which formally relates to

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1 it was about the support that was given post training.

2 **Q.** Was your view that, despite that additional support,
3 there still should be an extension in the managers'
4 training?

5 **A.** I still believe that. To be fair, there was
6 subpostmasters who went on that course and had no
7 problems with going back to their office, using training
8 mode, practising in the time before they had to do
9 a live balance. There were some subpostmasters who just
10 didn't want change, and it was never going to work in
11 their offices. It was very difficult, very difficult
12 times.

13 But some subpostmasters coped, but everybody seems
14 to concentrate on those that struggled. I don't know.
15 I don't know what more we could have done in terms of
16 support of that network there.

17 **Q.** Other than extend the time for training?

18 **A.** Other than -- but, even so, we could have extended it
19 another half a day, or day and a half, and there would
20 still have been subpostmasters that wouldn't have been
21 able to balance.

22 **Q.** Can we look at POL00028441, please. We're moving now to
23 the end of 1999/early 2000. Now, I know that you are
24 likely to have left certainly by January 2000.

25 **A.** Yes.

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1 Q. But let's have a look at this document. Can we look at
 2 page 3. This was a research project that took place in
 3 Christmas of 1999, so it may be that you were around at
 4 that time or certainly near the end of your time. Do
 5 you remember who Lorna Green was?
 6 A. Never heard of her, no.
 7 Q. If we look over the page, page 4 -- thank you -- it
 8 says:
 9 "This document accompanies the report entitled
 10 Christmas Horizon Research, January 2000, by Lorna
 11 Green. The report discusses the results of a telephone
 12 questionnaire carried out in December 1999 with a sample
 13 of 335 national rollout post offices and asks questions
 14 about various aspects of the Horizon programme."
 15 Was this a project that you were aware of before
 16 you left at all?
 17 A. No, no. Never heard of Christmas Horizon Research at
 18 all.
 19 Q. Were you, during your period of involvement, aware of
 20 any research projects other than the first one that
 21 I took you to -- in fact, that was carried out by ICL --
 22 any research projects that were undertaken by the
 23 Post Office to get substantive feedback from
 24 subpostmasters and others using the Horizon System?
 25 A. I know there was, but I can't tell you who done them or

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1 read the first few. It says:
 2 "Training for accounting was bad. Balancing took
 3 hours to sort out and was kept up until midnight
 4 sometimes. Tried to call Helpdesk but it was almost
 5 always engaged. But needed more time on balancing. The
 6 first day was all right but the quality of the training
 7 was not good on the second day."
 8 The next person said:
 9 "Because we concentrated on serving customers
 10 which was very easy but needed training on balancing in
 11 back office, I think it was useless."
 12 The next:
 13 "Inadequate particularly for balancing."
 14 Then, if we turn over the page:
 15 "Not enough time allowed. It was trying to cram
 16 too much in not enough time. Inadequate, day and a half
 17 was not long enough. No time to practice anything. It
 18 could ideally have been longer training session. We
 19 ended up being left totally confused. There was not
 20 enough time. Not long enough", et cetera.
 21 Although you didn't see this document at the time
 22 and weren't part of this research, are those consistent
 23 with your recollections and the concerns that you had at
 24 the time?
 25 A. I think it's perfectly -- exactly what I thought.

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1 when they were done. There certainly was. I would have
 2 thought perhaps our national training team may have done
 3 some research into how it was rolling out, but I can't
 4 remember who.
 5 Q. If we turn to page 14 of this document, this addresses
 6 training and this provides some of the feedback from
 7 those who took part in the survey. The first heading
 8 there is "Not enough training". I won't read them all
 9 to you but I'll read to you the first few.
 10 "One Respondent said there wasn't enough training.
 11 Another said, 'On the course, we were booked to go
 12 together and didn't get the appointment. We needed much
 13 more training and more time. Balancing needs looking
 14 at.'
 15 "It was completely inadequate. Day and a half was
 16 not enough, especially training for balancing was
 17 concerned. I am used to computers but some of the
 18 training was horrendous. Good but not enough. I only
 19 got one-and-a-half days' training."
 20 That again refers back to the beginning of your
 21 evidence today about the one-and-a-half days:
 22 "We needed more training. It was too rushed."
 23 If we turn over the page, there's another section
 24 of feedback which talks about not enough training on
 25 balancing. Again I won't read them all but I will just

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1 I think there's a lot of -- what you have got to realise
 2 is these comments that people are making here, they
 3 could have practised, if they'd gone into training mode
 4 when they got back to their office, and they could have
 5 practised, practised, made their mistakes then. So
 6 there was additional support, if they could be bothered
 7 to use the training mode. But, no, those comments,
 8 I probably agree with most of them.
 9 Q. To summarise where we're up to now, you've given
 10 evidence about your opinion that there was insufficient
 11 time for training, or you wanted an extra half a day.
 12 We've seen the feedback that talks insufficient time and
 13 a lack of balancing and cash account training. You have
 14 that note from Bruce McNiven about the complexity of
 15 conversion to the new system, and you have the
 16 Acceptance Incident 218 being raised.
 17 What I'd like to ask is: why, during your period
 18 of involvement, weren't those concerns about the length,
 19 including your concerns about the length of the
 20 training, taken seriously by the Post Office?
 21 A. I'm no idea. I've no idea. I mean, I used to go up to
 22 Chesterfield and speak with the TIP people to try and
 23 pre-warn them about the error rates that were going to
 24 increase, and I spoke to all my people in the
 25 Post Office that I knew and tried to look at the

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1 downstream effects. But perhaps it wasn't me. Perhaps
 2 I wasn't strong enough in trying to put my opinions over
 3 but -- yes, I could see all those comments happening. I
 4 really could.

5 Q. Would it have been easy to add half a day more training
 6 or a day's more training on --

7 A. Probably not. I mean, we could have separated it, but
 8 it would have been a bit of a logistical nightmare for
 9 them because, as soon as they finished the training, the
 10 Post Office -- the Peritas trainers would pack up all
 11 the equipment, get ready to move on to the next venue
 12 where they were holding training and reset all that up
 13 for the following courses.

14 But, if we'd had programmed it right, we could
 15 have done it. We could have had an extra half day with
 16 no problem.

17 Q. I would like to go to FUJ00001356. This is the Counter
 18 Managers' Course Specification, and it has there "status
 19 approved". Your name does appear there in the
 20 distribution list towards the bottom there. Can we
 21 scroll down slightly. So the distribution list there
 22 includes people from ICL Pathway, people from
 23 Post Office Counters Limited and also people from
 24 KnowledgePool. Is this a document that you remember at
 25 all?

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1 it was the right thing to do, yes.

2 Q. What I want to understand -- this is the document that
 3 sets out what the counter managers' course is going to
 4 involve. If we look at, say, page 4, it gives the
 5 introduction:

6 "This document contains the course specification
 7 to be used by KnowledgePool trainers..." et cetera.

8 Is why, despite the concerns that you had at the
 9 time, you approved this particular document -- you have
 10 given evidence before about being outvoted. Is this an
 11 example where you were told to approve it rather than --

12 A. Absolutely. This would have been the outcome of our
 13 first meeting we had with Pathway when we had the
 14 impasse. This would be what I had to work within, the
 15 boundaries I had to work within.

16 Q. So, although we see your name as the approval authority,
 17 in truth who would you say was the approver?

18 A. Well, it would probably have been by direct boss Douglas
 19 Craik.

20 Q. I would like to move on to several discrete topics now
 21 and I won't be particularly long.

22 Chair, I don't think we need a break this
 23 afternoon. If you are happy --

24 A. No, no, no, no, that's fine.

25 **SIR WYN WILLIAMS:** I think you have Mr Rollason's view of

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1 A. Not particularly, no, but I know the author was Andy
 2 Barkham who was my opposite number. So I'm sure I must
 3 have seen it.

4 Q. If we turn over the page, it has the document history
 5 there and I'm just going to read to you what it says
 6 about version 2.0. It says:

7 "Contains amendments made following evaluation
 8 exercise in July 1999. Document is based on the courses
 9 presented as dry runs through Post Office Counters
 10 Limited and signed off by Trevor Rollason in
 11 September 1999."

12 Do you remember the evaluation exercise; do you
 13 remember signing it off?

14 A. No. No, I don't.

15 Q. We have at 0.2 there the approval authorities and we
 16 have Andy Barkham of ICL Pathway, we have yourself from
 17 the Post Office, and we have Stuart Kearns from
 18 KnowledgePool. Can I just understand what an approval
 19 authority was. Does that mean that all three of you
 20 agreed this document?

21 A. I believe so, yes.

22 Q. Was that generally routine for these kinds of things
 23 that the three different parties would agree the
 24 specifications?

25 A. We wouldn't sign off unless all three of us agreed that

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1 that.

2 A. Sorry about that.

3 **SIR WYN WILLIAMS:** I am quite happy for us to continue until
 4 Mr Rollason has finished his evidence, subject only to
 5 thinking of the transcriber as well.

6 **MR BLAKE:** I think the transcriber is happy to have an early
 7 Friday afternoon.

8 **SIR WYN WILLIAMS:** Then we are all happy, Mr Blake.

9 **MR BLAKE:** Thank you. Can we look at FUJ00001322, please,
 10 and that is the "Training Programme, Training Needs
 11 Analysis", and we have you there on the distribution
 12 list.

13 This is version 2.0 and it's dated July 1999.
 14 There are earlier versions of this dating back to 1997
 15 that we have, and it's the same point that's contained
 16 throughout multiple versions of this document that I'd
 17 like to take you to, and it's page 5 which lists the
 18 objectives.

19 But just before we get to page 5, sorry, if we
 20 just look at page 2, it has again there "Approval
 21 Authorities" and we have the same ICL TS. Sorry, are
 22 you aware of TS?

23 A. No.

24 Q. So it's part of ICL, ICL Pathway, and then you have
 25 POCL. So you have the three approval or three approval

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1 authorities for this document, very consistent with what
 2 you've told us about requiring multiple approval
 3 authorities.
 4 It's page 5 which has the objective of training.
 5 I'm just going to read this out. So it says:
 6 "ICL Pathway have contracted ICL TS Limited to
 7 provide the training programme..."
 8 So this was one of the -- I think Peritas had
 9 multiple different names over the years.
 10 **A.** Yes, this is Peritas, we're talking about here.
 11 **Q.** "... to provide the training programme in support of the
 12 POCL counter automation project. The training programme
 13 is required by ICL Pathway to meet the following
 14 objectives.
 15 "Compatibility -- the programme must be managed
 16 and delivered in a manner consistent with the
 17 implementation programme undertaken by ICL Pathway
 18 Limited and their other subcontractors.
 19 "Timeliness -- no individual is to be trained more
 20 than five working days prior to the automation of their
 21 normal counter position.
 22 "To the required scope which is [and this is part
 23 in bold] to ensure that all staff who work within a post
 24 office are competent in the use of the automated
 25 platform, are aware of the impact on operational
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1 not quite sure how we measured that, but 95 per cent of
 2 the personnel had to pass the competency test to obtain
 3 their certificate of competency to go back to work in
 4 a live environment.
 5 That was measured by Pathway -- Peritas' trainers
 6 and, if they failed to reach the required standard, they
 7 were invited back for another training course. If they
 8 failed again, they become the responsibility of Post
 9 Office Counters to finish off their training. That's
 10 about what I remember of that part of it.
 11 But we were heavily involved, myself and Ann Green
 12 were heavily involved, in developing this competency
 13 test along with Kathryn Cook to make sure that, you
 14 know, the counter clerks could do the basic things like
 15 switch the computer on, log in, do a sale of stamps,
 16 multiple transactions, savings bank. So they could do
 17 the whole range of business that they could actually do
 18 and, at the end of the day, do the end-of-the-day
 19 requirements as well. So yes, it was -- that was
 20 measured by the Peritas trainers.
 21 **Q.** Do you consider that the competency testing sufficiently
 22 focused on balancing, or was it more focused on those
 23 inputting type tests that you have just described?
 24 **A.** It did concentrate on balancing, obviously, but probably
 25 not enough. It certainly was enough for the basic
 71

1 procedures caused by the introduction of the platform
 2 and that specialist staff are provided with the
 3 appropriate additional information to perform their job
 4 role within an automated Post Office."
 5 It then goes on to say:
 6 "Achieve appropriate competence levels -- the
 7 delivered programme is required to ensure that
 8 95 per cent of personnel have a minimum competence that
 9 they are capable of processing 90 per cent of all
 10 transactions undertaken by their base office correctly."
 11 Do you remember this objective at all?
 12 **A.** Yes. Yes, I remember this document. This was like the
 13 Bible, to be quite honest.
 14 **Q.** Are you able to assist us with those figures that bottom
 15 there, so:
 16 "The delivered programme is required to ensure
 17 that 95 per cent of personnel have a minimum competence
 18 that they are capable of processing 90 per cent of all
 19 transactions."
 20 How was that monitored?
 21 **A.** We actually introduced a competency test. You didn't
 22 like the name competency test, and I listened to Bruce's
 23 statements yesterday or day before. It was changed to
 24 "certificate of competence" and it was measured against
 25 that. Processing 90 per cent of all transactions, I'm
 70

1 one-day course. It wasn't overly difficult, I don't
 2 think, the one-day course. The one-and-a-half day
 3 course was obviously more difficult with the balancing
 4 aspects, and it would have -- they would have had to
 5 achieve a balance to have passed the competency test,
 6 yes.
 7 **Q.** But you have expressed views about the length of that
 8 course, testing competency when it became to balancing.
 9 If there wasn't sufficient training in relation to those
 10 issues, did that impact in some way on how difficult or
 11 rigorous or stringent the competency test would be when
 12 it came to issues such as balancing?
 13 **A.** Well, I can't remember what we put on the second part of
 14 that course in terms of competency. But they would have
 15 had to have achieved a balance to have been classed as
 16 competent to go back to their office.
 17 **Q.** If we look at the figures there, 95 per cent have to
 18 have a minimum competence, do you know what happened to
 19 the 5 per cent who didn't, who failed?
 20 **A.** They become our responsibility, Post Office Counters'
 21 responsibility, to continue their training and that
 22 would have been the responsibility of the subpostmaster
 23 probably.
 24 **Q.** The 90 per cent there of transactions that need to be
 25 correct, was that in any way an acknowledgement that it
 72

1 was unlikely that 100 per cent of transactions would be
 2 correct?
 3 **A.** I mean, the Post Office did so many different
 4 transactions, you'd have needed a week to train someone
 5 on all the different transactions we did. So you could
 6 only cover as much as we could cover, and they were all
 7 the main transactions that you would have done, like
 8 a Girobank deposit/withdrawal, savings bank
 9 deposit/withdrawal. All the main transactions that you
 10 normally would perform would have been covered in that
 11 competency test.
 12 **Q.** If we scroll down, we have the population to be trained
 13 there, and it starts with postal officers, branch
 14 managers, et cetera. It has also auditors and
 15 Post Office security.
 16 **A.** Yes.
 17 **Q.** Do the concerns that you have raised regarding the
 18 managers' training extend to the training of the
 19 auditors and the Post Office security?
 20 **A.** No, no.
 21 **Q.** Why not?
 22 **A.** Because we had -- auditors were certainly involved in
 23 developing the course as were -- you haven't got on
 24 there our investigation department. That was also on
 25 there. So we knew all the requirements. I can't

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1 that may happen with automation. That was a big
 2 concern."
 3 Can you give us an indication of the typical
 4 problems that were experienced with the cash and
 5 reconciliation accounts?
 6 **A.** Well, you have already mentioned that some people were
 7 there until 11/12 at night trying to balance their
 8 accounts. There's others, come 9.00 on Thursday
 9 morning, that still hadn't reconciled their accounts,
 10 but they had to open their office and go live. So they
 11 were sending accounts that didn't actually balance up to
 12 Chesterfield, and Chesterfield then would have to try
 13 and balance their accounts, try and find out where any
 14 errors were, and this increased the number of error
 15 notices significantly. It was something -- it was
 16 obvious that it was going to happen.
 17 **Q.** You said there in paragraph 21 that you forewarned the
 18 head of the group finance division. What was the
 19 purpose of forewarning? Was it for them to go easy on
 20 subpostmasters --
 21 **A.** Oh, no, no. No, certainly not. To ensure they'd got
 22 sufficient staff to unravel some of the problems that
 23 were going to occur, and I remember vividly there was
 24 a subpostmistress down in Oxfordshire, she was in her
 25 80s, and myself and Ann Green had to go down to her

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1 remember the length of the courses but they were happy
 2 with the length of the course that we gave them.
 3 Post Office security probably the information
 4 investigation department trainers, yes. No, we didn't
 5 have any problems with the length of courses for those
 6 outside of the core number that needed doing.
 7 **Q.** Thank you. If we could take that down, I am going to
 8 ask you now about fraud investigations, and that's
 9 something that you've mentioned in your statement. Can
 10 we look at your statement at paragraph 21, please.
 11 That should be page 7. Thank you. If we could
 12 enlarge paragraph 21, I'll just read that out. It says:
 13 "I spent a lot of time with Judy Land to sort
 14 incorrect and incomplete cash accounts and the problems
 15 it would cause."
 16 Pausing there, who was Judy Land?
 17 **A.** She was the head of our finance in Chesterfield. She
 18 looked after all the reconciliation of the accounts.
 19 **Q.** Thank you. You say:
 20 "She was the head of group in the finance division
 21 and looked after the cash and reconciliation accounts.
 22 I forewarned her of problems when there first lot of
 23 cash accounts came in. Some didn't balance and others
 24 hadn't been completed correctly. I also spent time with
 25 the fraud department to discuss the problems and fraud

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1 office and unravel the accounts that she got into. It
 2 took us nearly a day to reconcile what she'd got left in
 3 there.
 4 So there was going to be problems. We knew there
 5 were going to be problems, and it was just to forewarn
 6 them to expect a bigger workload than what -- until they
 7 got used to it and knew what they would additionally be
 8 getting.
 9 **Q.** Having left in 1999, you weren't around to see whether
 10 the amount reduced or not; is that right?
 11 **A.** No, I wasn't around. I hope it did.
 12 **Q.** Were potential bugs, errors or defects in the Horizon
 13 System discussed with the finance division?
 14 **A.** I didn't discuss them with them, no.
 15 **Q.** Was it in your mind at all at the time?
 16 **A.** No, no. I mean, we were hearing the problems that they
 17 were having with Horizon in the outlets, like screens
 18 would freeze, printers wouldn't print out, barcode
 19 scanners wouldn't scan, they'd have a power surge and
 20 something would happen with the system. So we were
 21 aware that there was problems with the hardware, in
 22 particular, and possibly the software, but that was all.
 23 **Q.** You said you spent time with the fraud department. Was
 24 that the fraud department within the Post Office, was
 25 that the security team or was it something else?

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1 A. Both. The fraud was with the benefit agency in the
 2 early stages, looking at the issues, and then we also
 3 spoke to the investigation team to find out what they
 4 needed to understand about interrogating the system, and
 5 developing the course that suited their requirements.
 6 So there was a specific course for them.
 7 Q. What did you understand their role to be in connection
 8 with Horizon?
 9 A. The investigation people?
 10 Q. Yes.
 11 A. They would go in when there's a large loss, and they
 12 should go in and try and find out what's wrong with the
 13 system or what's wrong with the accounts.
 14 Q. The problem that you described having discussed with the
 15 group finance division, were those discussions you also
 16 with that team?
 17 A. Possibly. I can't remember. I would have thought so.
 18 I would have thought so.
 19 Q. Who in particular in that team would you have spoken to,
 20 or who was your contact or main contact?
 21 A. I don't know. It was -- there was auditors from head
 22 office, there was local auditors involved in developing
 23 their course. I would imagine there was the same with
 24 the investigation departments. There was headquarters
 25 investigation team and local investigators to tell us

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1 familiar to you at all?
 2 A. Yes.
 3 Q. You remember the training workbooks?
 4 A. I remember there was eight. There was EPOSS, BES, OBBS.
 5 There was all different categories, and I think there
 6 was an interview on this morning where the lady said, if
 7 you went through these documents, these workbooks stage
 8 by stage, you could actually do the job.
 9 Q. It was hundreds of pages long in total.
 10 A. Oh, absolutely. There was pages and pages of it.
 11 Q. Can you remember when these were given to
 12 subpostmasters, whether it was before the training,
 13 after the training?
 14 A. Do you know what, I was trying to think that today,
 15 whether they were given at the training or whether they
 16 were at the outlet when they got back, and I honestly
 17 can't remember.
 18 Q. If we turn over the page, I think you saw Mr Fletcher's
 19 evidence. They were produced by KnowledgePool.
 20 A. Yes.
 21 Q. Do you remember who produced them or who inputted into
 22 them at all?
 23 A. The input would have been from our team from Peritas.
 24 Q. So it would have been a joint document?
 25 A. Absolutely, yes. We would have to have had an input

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1 what they needed, because we didn't know exactly what
 2 they required, and we worked with them.
 3 Q. Can you remember any names of any individuals that you
 4 discussed that problems with the cash and reconciliation
 5 accounts with in Chesterfield or elsewhere?
 6 A. Well, obviously there was Judy Land, and we had
 7 several -- well many, many meetings in different people
 8 from -- Chesterfield's a huge place, and we'd had many
 9 meetings from different departments just to explain to
 10 them where we were within it, how we were developing
 11 a system. But no, I can't remember anybody else, mainly
 12 Judy Land.
 13 Q. Was your impression of your knowledge that those kinds
 14 of issues were known higher up the chain in Post Office
 15 management at all?
 16 A. If they weren't, they should have been.
 17 Q. Looking back, do you think they were?
 18 A. That's difficult to say, difficult to say.
 19 Q. It may be difficult but shall we give it a go?
 20 A. Yes, I'm sure some of the senior managers knew that the
 21 problems were going to be experienced in Chesterfield,
 22 yes.
 23 Q. Moving on to the workbooks that you mentioned, can we
 24 look at FUJ00117722, please. This is a training
 25 workbook. It's number 8 of 10. Is this document

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1 into all those books.
 2 Q. Thank you. Can we look at page 11. So this is the
 3 training workbook 8 which addresses help and basic
 4 maintenance on the Horizon System.
 5 A. Yes.
 6 Q. If we look at page 11 at the top, it says:
 7 "Occasionally things may go wrong with the Horizon
 8 System, or you may need help with a particular process
 9 or procedure. This section explains the help functions
 10 available. If a failure occurs on any part of the
 11 Horizon System, you must telephone the Horizon System
 12 Helpdesk."
 13 If we look over the page, you may recall I took
 14 Mr Fletcher to this. It says:
 15 "If you have a failure of the complete system or
 16 one of its components, these are the procedures to
 17 adopt."
 18 Then it talks about power failures, touch screen
 19 failures, card reader failures, et cetera, and for each
 20 of those entries ultimately it says, "Call the Horizon
 21 System Helpdesk."
 22 I think you have said in paragraph 50 of your
 23 evidence that, where there is a discrepancy, the
 24 subpostmaster had the helpline available. Was the
 25 helpline seen as where postmasters and assistants and

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1 others should turn to if there are, for example,
 2 software issues and discrepancy issues?
 3 **A.** Yes, I think the helpline was the first point of call.
 4 I heard someone say it was very difficult to get through
 5 to helpline. If they couldn't get through to the
 6 helpline, then you obviously had the workbooks that you
 7 could refer to. There was quick reference guides I saw
 8 back there. There were other ways. Also I know a lot
 9 of them actually contacted fellow subpostmasters and
 10 spoke to them and said, "Look, I've got this problem.
 11 Have you experienced it?" They networked between them.
 12 But the helpline was there. The helpline was very
 13 good.
 14 **Q.** We spoke at the beginning and throughout your evidence
 15 about needing a bit more time doing the training. Do
 16 you think that there was too heavy a reliance on the
 17 Helpdesk to make up for any inadequacies in the
 18 training?
 19 **A.** Well, it wasn't just the Helpdesk that were there.
 20 Don't forget, the Horizon Field Support Officers were
 21 there and they were there for at least the first week,
 22 second week, maybe even third week of balancing. So
 23 they were there. They were the first line. Physically
 24 they were there to help and build the confidence. It's
 25 probably when they left that most of it went then to the

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1 inadequately trained as the subpostmasters, assistants
 2 and others?
 3 **A.** I don't recall but I doubt very much if the Helpdesk
 4 staff received the same training course as the
 5 subpostmasters. I would have thought they would have
 6 received more training.
 7 **Q.** In respect of the subpostmasters and assistants and
 8 others, do you think that the insufficiency, in terms of
 9 time allocated to training for balancing, impacted on
 10 the Helpdesks because those subpostmasters were having
 11 difficulty balancing the cash accounts, et cetera?
 12 **A.** Quite possibly, quite possibly.
 13 **MR BLAKE:** Thank you, Mr Rollason. I don't have any further
 14 questions. I am going to look around the room just to
 15 see. Thank you. Mr Whittam from Fujitsu has some
 16 questions.
 17 **Questioned by MR WHITTAM**
 18 **Q.** Just some very short ones in relation to your statement,
 19 if I may, if that could come up on the screen, please.
 20 WITN05240100, and if we could go to page 13, please.
 21 This is just to put it into the context. If we scroll
 22 to the bottom, please, it's in the passage dealing with
 23 Horizon Training and Competencies Development Group. So
 24 that's just to put it into context. If we go over,
 25 please, to page 15, it's paragraph 46. I'd just like

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1 Horizon System Helpdesk. Was there too much? I don't
 2 know. It must have been, I suppose, if they couldn't
 3 get through to it.
 4 **Q.** To give you an example, if we look at POL00090478 which
 5 is a document we've looked at earlier -- this is the
 6 Acceptance Incident document -- and, if we look at
 7 page 9, if we look that left-hand side, it's talking
 8 about inadequacies in training, and it says:
 9 "The consequences are also that the number of cash
 10 account related incidents reported to POCL NBSC is
 11 considerably greater than expected. (About a third of
 12 the calls coming to NBSC Helpdesk indicate a lack of
 13 understanding of the cash accounting and balancing
 14 process). Horizon System Helpdesk are responsible for
 15 resolving these incidents but are unable to cope with
 16 the contents and volumes of calls which are therefore
 17 having to be dealt with by NBSC. As the manager's
 18 training course is deficient, NBSC and presumably
 19 Horizon System Helpdesk staff who receive this training
 20 course are also inadequately trained."
 21 Would you agree with that?
 22 **A.** No. I don't see how you can relate the two. Horizon --
 23 is that -- HS Horizon Helpdesk is that?
 24 **Q.** Yes. I think the suggestion there is that the Helpdesk
 25 staff received the same training and, therefore, are as

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1 you to help us with, please.
 2 You've been talking there in the previous
 3 paragraph just above it about the entry level
 4 competencies of the SPMs coming on to the course, and
 5 then in paragraph 46 you say:
 6 "POCL staff weren't a problem."
 7 Who would you include in the POCL staff there,
 8 just to help us understand?
 9 **A.** Directly employed staff that worked for the Post Office.
 10 **Q.** Thank you. You carry on:
 11 "However, once you went live, any new staff
 12 employed by the SMPs were trained by the SPMs not POCL."
 13 **A.** That's correct.
 14 **Q.** Was there any difference in the training before it went
 15 live than after it went live as to who was responsible,
 16 as far as you were concerned?
 17 **A.** The subpostmaster was always responsible for training
 18 any new members of staff that he or she took on board.
 19 POCL were responsible for training any new
 20 subpostmasters that came on.
 21 **Q.** Thank you. You make the observation:
 22 "That diluted the quality of the training",
 23 presumably because it was being then second-hand not
 24 from a trainer but from somebody who had been trained?
 25 **A.** Correct.

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1 Q. And you thought that This was another area of risk that
 2 you raised with Douglas Craik and with Bruce McNiven,
 3 "but there wasn't a solution we could afford to do."
 4 Is that POCL affording to do it?
 5 A. Yes.
 6 Q. As you have already indicated to us, you just had to
 7 accept that there would be mistakes made by these
 8 people. You don't know how POCL became aware of this
 9 issue, but you all knew about these issues. So it was
 10 common knowledge there were going to be errors?
 11 A. Yes. I mean, I was an ex-area manager, so there was
 12 mistakes in the manual environment. So it was fairly
 13 obvious to all of us that there was going to be more
 14 mistakes in an automated environment to start with
 15 anyway. Then, when you take on new staff, not only have
 16 they got to learn how to do the transaction and
 17 understand the transaction, but they've got to learn how
 18 to use the Horizon platform as well. So inevitably
 19 there will be more mistakes until they get the
 20 experience not to make the mistakes.
 21 Q. Thank you. If we could go to page 17, please, just at
 22 the top, paragraph first. You touched on this in one of
 23 your previous answers. You had been asked what you
 24 thought an SPM ought to be able to do at the time, once
 25 they noticed a discrepancy between Horizon-generated

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1 there would be the possibility of an investigation or
 2 a prosecution?
 3 A. Yes, of course.
 4 Q. Was that, as far as you understand it, the same contract
 5 that the subpostmaster had on the paper-based system
 6 pre-Horizon and obviously post Horizon?
 7 A. I don't recall anybody telling me that subpostmasters'
 8 contracts were changed from when they originally signed
 9 their contract.
 10 Q. Thank you.
 11 If we could just go to page 22, paragraph 72 at
 12 the very bottom, please, you describe the support that
 13 was provided after the training session, was that via
 14 the Horizon Field Support Officers?
 15 A. That's correct, yes.
 16 Q. You described the help that was given. Were you aware
 17 of subpostmasters raising issues with the Horizon Field
 18 Support Officers about problems with balancing?
 19 A. Yes, absolutely. They even raised them with us, myself,
 20 when we went to user awareness events. Some
 21 subpostmasters who had gone live came along to the
 22 events and said they were having a problem with the
 23 balancing.
 24 Q. So being reported back, and did you report it on to
 25 other people?

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1 data and the actual cash and stock in the branch, and
 2 you described to us having the helpline available.
 3 There were obviously discrepancies on the old
 4 paper system before Horizon came in.
 5 A. Correct.
 6 Q. Were subpostmasters, both before and after Horizon came
 7 in, warned or trained as to the implications of a cash
 8 account error or a discrepancy error? Was that just
 9 common knowledge?
 10 A. It was part -- I'm not sure. Please don't quote me, but
 11 I'm pretty sure it was part of the contract that, if
 12 a subpostmaster incurred a loss, it was his
 13 responsibility to make good that loss and, likewise, if
 14 he made a profit, which very rarely happened, he could
 15 take that or she could take that money out. As an area
 16 manager my advice to all my subpostmasters was, "If you
 17 get a loss, record the date, make the loss good, but
 18 wait for an error notice to come back in case you've
 19 made a mistake, and Chesterfield have to find that
 20 mistake. Don't take the money out, keep it separately
 21 and, if the error notice comes back, you've got the
 22 money there to put back in." But it was always the
 23 responsibility of the postmaster to make sure that his
 24 account balanced.
 25 Q. If there was a particular problem or a large problem,

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1 A. I think it was just common knowledge that they were
 2 experiencing problems. I don't recall actually saying
 3 to someone, "This postmaster's had a loss." But the
 4 Field Support Officer would have been the person that
 5 was reporting to whoever their bosses were -- and
 6 I can't remember what they were called -- of the
 7 problems that they were having with balancing.
 8 Q. It sounds like a silly question, but common knowledge,
 9 common knowledge within the Post Office?
 10 A. Within the Post Office, yes.
 11 **MR WHITTAM:** Thank you, sir. Those are the only questions
 12 I have.
 13 **MR BLAKE:** Thank you, sir. Ms Page, has some questions as
 14 well.
 15 **Questioned by MS PAGE**
 16 Q. Thank you, Mr Rollason. I ask some questions on behalf
 17 of some of the subpostmasters in this Inquiry, and I'd
 18 like to ask you about your contact with Chesterfield
 19 that you have told us was pretty extensive during the
 20 time that you worked on Horizon. Did you stay in touch
 21 at all with people in Chesterfield?
 22 A. What, after I left?
 23 Q. Yes.
 24 A. No.
 25 Q. So you don't know anything about large job losses in the

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1 2000s in Chesterfield?
 2 **A.** No.
 3 **Q.** All right. Well, I won't ask any further questions
 4 about that then.
 5 Can I just ask this: you say in your statement
 6 that you think that glitches in the software were the
 7 root cause of the wrongful prosecutions that
 8 subpostmasters faced.
 9 **A.** Mm-hm.
 10 **Q.** If you're right about that, that might explain, mightn't
 11 it, why somebody like Janet Skinner, who I represent,
 12 who was prosecuted might be able to work with Horizon
 13 for some years before then she was subject to
 14 mis-balances which led to her prosecution?
 15 **A.** I don't know if I said that. I think I said something
 16 along the lines that Fujitsu had admitted that there
 17 were glitches in the system. I didn't know whether that
 18 was a glitch that happened in 1997 or it was a new
 19 release of software that happened between 1997 and
 20 whenever these prosecutions took place. If it took
 21 place after Horizon had rolled out, then I don't see how
 22 you can blame the initial training, et cetera,
 23 et cetera. Someone's released software in there that
 24 hasn't been tested properly. That was my concern.
 25 **Q.** So if somebody in 2006 who's been working with Horizon
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1 for some years without problems then faces problems,
 2 that does rather suggest it's the software, doesn't it?
 3 **A.** I would have thought so.
 4 **Q.** Thank you.
 5 **A.** It's what release and was the release tested properly.
 6 **MS PAGE:** Thank you.
 7 **MR BLAKE:** Thank you very much, sir, unless you have any
 8 questions.
 9 Mr Rollason, do you have anything you'd like to
 10 add?
 11 **A.** No, no, nothing at all. Thank you.
 12 **SIR WYN WILLIAMS:** Well, after a degree of difficulty in
 13 getting you equipped to give evidence, you have given
 14 evidence and I'm very grateful for you for so doing. So
 15 thank you, Mr Rollason.
 16 **A.** Thank you very much.
 17 **SIR WYN WILLIAMS:** So I won't repeat what I said about an
 18 hour and a half ago, Mr Blake, but we're now going to
 19 have a break for a few weeks and a new timetable will be
 20 published on Monday. That's it, isn't it?
 21 **MR BLAKE:** Absolutely. Thank you, sir.
 22 **SIR WYN WILLIAMS:** Fine. All right then. Thank you all
 23 very much.
 24 (1.13 pm)
 25 (The Inquiry adjourned)
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