

1 **Wednesday, 22 February 2023**

2 **(10.00 am)**

3 **MR BEER:** Good morning, sir.

4 **SIR WYN WILLIAMS:** Good morning.

5 **MR BEER:** May I call Susan Harding, please.

6 **SIR WYN WILLIAMS:** Yes, of course.

7 **SUSAN HARDING (affirmed)**

8 **Questioned by MR BEER**

9 **MR BEER:** Ms Harding, my name is Jason Beer and, as
10 you know, I'm Counsel to the Inquiry. Can you
11 give the Inquiry your full name, please.

12 **A.** Susan Mary Harding.

13 **Q.** Many thanks for the witness statement you have
14 provided to the Inquiry and for coming along
15 today to assist us with our investigation. Can
16 you look in the bundle in front of you. There
17 should be a copy of a witness statement dated
18 23 September of last year, which is 8 pages in
19 length.

20 **A.** Yes, I have found that.

21 **Q.** Can you go to the eighth page, please.

22 **A.** Yes.

23 **Q.** Is that your signature?

24 **A.** It is.

25 **Q.** Are the contents of that witness statement true

1

1 20 years into my service but I can't remember
2 the date exactly.

3 **Q.** Was it before Horizon was born?

4 **A.** Yes.

5 **Q.** When was your first involvement in the Horizon
6 project?

7 **A.** It would have been in the initial Horizon
8 project -- would that have been around 1998 --
9 something like that. I was working in a back
10 office, transaction processing, which was the
11 place that received the cash accounts from the
12 offices and I was in the development team, so
13 I was responsible for interacting with any
14 projects that would affect that unit in the
15 business.

16 **Q.** What was your job title there?

17 **A.** Head of -- I was probably head of development or
18 something like that, yeah.

19 **Q.** Head of development?

20 **A.** Yes.

21 **Q.** Whereabouts was that office?

22 **A.** It was in Chetwynd House in Chesterfield.

23 **Q.** Did you manage a team?

24 **A.** I did.

25 **Q.** How many were in the team?

3

1 to the best of your knowledge and belief?

2 **A.** They are.

3 **Q.** A copy of that witness statement will be
4 uploaded to the Inquiry's website and therefore
5 become public. I'm not going to ask you
6 questions about every part of it, you
7 understand.

8 **A.** Okay.

9 **Q.** Can we start, please, with your background and
10 experience. I think you were employed by the
11 Post Office for 40 years or so, is that right,
12 between 1976 and 2017?

13 **A.** I was.

14 **Q.** Do you have any professional qualifications that
15 are relevant to the issues that you know we're
16 going to discuss and are considering today?

17 **A.** Yes. I qualified through the Post Office as
18 an accountant so I'm a CIMA.

19 **Q.** For the benefit of those who don't know, what is
20 a CIMA?

21 **A.** Chartered Institute of Management Accountant, so
22 it's more about management accounting than
23 financial accounting.

24 **Q.** When did you become chartered?

25 **A.** Oh, heavens, I don't know. Probably about

2

1 **A.** I can't remember now but it wouldn't have been
2 a vast team. Maybe somewhere between 10 and 20.

3 **Q.** And --

4 **A.** It depended on what projects we'd got as to how
5 many people we'd have in the team.

6 **Q.** When you first became involved in the Horizon
7 project, what did you do? What was your role?

8 **A.** I was involved in looking at the impact of that
9 on the business unit that I was working in, and
10 signing off requirements and getting involved in
11 testing and acceptance.

12 **Q.** You were involved in the testing of Horizon?

13 **A.** Well, I was not actually doing the testing.
14 Some of my team might have been there testing
15 certain things but it was more about the outputs
16 into the back office and making sure that the
17 cash account, which was the output at the time,
18 was still valid and still would represent what
19 would have been normally produced through the
20 manual process or through the other systems that
21 were in place at the time.

22 **Q.** So was this in 1998, 1999?

23 **A.** It would be around that time, yes.

24 **Q.** In that period, when you were involved, in the
25 way that you've described, in the testing of

4

1 Horizon, were you aware -- were you told -- that
 2 there were errors, bugs and defects with it that
 3 affected the reliability of the data that it
 4 produced?
 5 **A.** No, I don't recall that. I mean, we were
 6 obviously -- in the testing phase you're looking
 7 at outputs and we did get involved in Acceptance
 8 Incidents, particularly any that would have
 9 affected the integrity of the accounts.
 10 **Q.** So moving on to that phase, then, the acceptance
 11 phase --
 12 **A.** Yes.
 13 **Q.** -- if you were involved in Acceptance Incidents,
 14 Als, I think it does follow that you must have
 15 been aware of errors, bugs and defects with
 16 Horizon that affected the reliability of the
 17 data that it produced?
 18 **A.** Well, yes, yes. Obviously, if there's
 19 an Acceptance Incident that's what tells you
 20 that there is a problem.
 21 **Q.** Who did you report to?
 22 **A.** Um --
 23 **Q.** Dealing with the acceptance phase.
 24 **A.** Well, probably I was linked into Ruth Holleran,
 25 but my direct report was Andy Radka at the time.

5

1 I was managing a team that was doing that. But
 2 that's a normal acceptance process that you say
 3 "What should the system produce and has it
 4 produced that?" Yeah.
 5 And that would be initially in the test
 6 systems. It would not be in the live
 7 environment but, obviously, later -- in later
 8 phases there would be some acceptance due to
 9 some live trials.
 10 **Q.** Looking at the matter at a high level of
 11 generality, would you agree with the suggestion
 12 that the acceptance process for Horizon was
 13 extremely problematic?
 14 **A.** I don't know. You'd need to say what you mean
 15 by "problematic". I think it was challenging.
 16 It was a big system, it was complex. But
 17 I don't think -- yes, there were Acceptance
 18 Incidents but there were processes to make sure
 19 that those Acceptance Incidents were closed down
 20 to the Post Office's criteria.
 21 **Q.** So by the end of acceptance, everything was fine
 22 with Horizon, was it?
 23 **A.** As far as I'm aware. I mean, I'm not, you know,
 24 I wasn't as high up in the chain. I wasn't --
 25 I was only responsible for accepting certain --

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1 **Q.** Why were you probably linked in to Ruth
 2 Holleran?
 3 **A.** Because she was sort of in charge of managing
 4 the acceptance process and she worked for Dave
 5 Smith at the time.
 6 **Q.** What was your job title at this time, when you
 7 were involved in the acceptance of Horizon?
 8 **A.** I was just the development team manager in
 9 transaction processing.
 10 **Q.** You mention a couple of job titles in your
 11 statement: head of the operating process and
 12 business process architect.
 13 **A.** Yes.
 14 **Q.** Did they come later?
 15 **A.** They did.
 16 **Q.** What did you do in order to perform your role,
 17 accepting the system from an accounting
 18 perspective, which is how you put it in your
 19 statement?
 20 **A.** Yeah, well, we would see the outputs of testing
 21 and we would be -- we would -- if you're doing
 22 that sort of thing, you'd normally have expected
 23 results and then you see what the actual results
 24 are for the system and you compare them.
 25 Remember that I wasn't doing the detail here;

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1 or getting involved in certain Acceptance
 2 Incidents. I wasn't in the sort of roles that
 3 other people were in signing it off.
 4 **Q.** So within that limitation that you've just
 5 described, did you work on the basis that, by
 6 the time that Horizon was rolled out, it was
 7 producing accurate, reliable and robust data?
 8 **A.** Yes, I would say that. I wouldn't have signed
 9 it off if I didn't think that was the case.
 10 **Q.** Data that could be used in order to investigate,
 11 take proceedings against and criminally
 12 prosecute an individual?
 13 **A.** Yes, I would have said that, although I -- of
 14 course, the Network would have been involved in
 15 having a say on that. So it wasn't our role in
 16 transaction processing to do those prosecutions
 17 or to do that investigation. So we would
 18 simply -- I suppose my role was simply to say
 19 "Are these statements that -- or -- that are
 20 produced" -- because it produced a paper -- it
 21 still produced a paper cash account at that time
 22 -- "Are the expected results correct?"
 23 **Q.** You worked on the basis that they were correct,
 24 reliable and the system was robust and
 25 infallible?

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1 A. In terms of producing those outputs, our
2 evidence was that it was robust. We wouldn't
3 have signed -- I wouldn't have signed off
4 something that I had any evidence of that it was
5 producing numbers that were not correct.
6 Q. That's slightly self-fulfilling: "I wouldn't" --
7 "It must have been robust because otherwise
8 I wouldn't have signed it off, if it hadn't have
9 been robust".
10 A. Yeah.
11 Q. On what evidence were you working? Who was
12 telling you that the system was robust, that --
13 A. My team, who were --
14 Q. Hold on. If we take it in turns, it'll work
15 better.
16 A. Yeah.
17 Q. On the basis of what evidence did you come to
18 the conclusion that the system was robust and
19 was producing data that was accurate?
20 A. Because we would, on a testing basis, have
21 expected results based on the inputs that we'd
22 reviewed that were going to go in. So if we
23 knew what data was going to be put in the test
24 system we would have expected results for what
25 the output would be and our testing would have

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1 Q. You weren't told about one or two people calling
2 up helplines and saying, "We're having problems
3 balancing"?
4 A. No.
5 Q. No?
6 A. No, that wouldn't --
7 Q. Not even a single call?
8 A. That wasn't really my role that would have been
9 other people in the project team.
10 Q. So you worked on the basis that, up until
11 rollout, the system had been got to a place
12 where it was working perfectly well and then you
13 didn't hear anything adverse about it
14 afterwards?
15 A. No.
16 Q. When did you become involved in the IMPACT
17 Programme?
18 A. Right, so you've mentioned the other roles
19 I did. So after being in transaction
20 processing, at the head of development, I became
21 head of the operating process and business
22 process architect and, as business process
23 architect, I was asked to redesign other parts
24 of the process. So we still had old, antiquated
25 back office systems. So Horizon was required to

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1 told us that those outputs were as we expected.
2 And you have to remember, this would have been
3 test systems to start with and then there would
4 have been stuff during -- when it went into
5 pilot, et cetera, that we would have been
6 involved in, as well, before ultimately
7 accepting it.
8 Q. When did your role in acceptance end?
9 A. I would say when the system went live. When it
10 started to -- when it was -- well, probably when
11 we finished pilot. We wouldn't have got
12 involved in anything after that. So we would
13 have been involved in before the first office
14 went live and then, as far as I recall, there
15 was a pilot and we would be reviewing results
16 through that pilot.
17 Acceptance would have been for it to go into
18 pilot to start with but then there would have
19 been another acceptance phase to actually then
20 roll it out.
21 Q. What did you learn about the operation of
22 Horizon in practice after it was rolled out?
23 A. Nothing that -- I was not aware of anything that
24 I heard or was told about afterwards that would
25 say it was any different from what we'd seen.

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1 produce a cash account and what we wanted to do
2 was put a SAP system into the back end that
3 would take an automatic feed from the Horizon
4 System.
5 And I'd come up with that all as part of my
6 role as business process architect, et cetera.
7 So as a result of that work that I was done,
8 I was then asked to lead the project to
9 implement that.
10 Q. So my question was when?
11 A. I don't know. Early 2000s. So it might have
12 been three or four years after Horizon had gone
13 live.
14 Q. Were you doing anything in relation to Horizon
15 in the three or four years between Horizon going
16 live and picking up what I'm calling the IMPACT
17 Programme?
18 A. Well, not really in that way because, as I say,
19 I went into more future looking roles, which was
20 where I ended up running IMPACT because that was
21 the future -- so I was looking into where do we
22 go next because, basically, we'd left the back
23 office as it was. We'd done the hard work on
24 automating the front office but we were left
25 with a back office which was a home developed

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1 system that was not -- was very clunky, that
2 required paper, you know.

3 So the whole concept that I developed was
4 to -- was to put SAP systems in the back office,
5 which would take a daily feed, ultimately, from
6 Horizon. So we would have the data faster, less
7 effort to do the keying and all those sorts of
8 things.

9 **Q.** Can I confirm that in that three or four-year
10 period you weren't told of any problems about
11 the reliability and accuracy of the data that
12 Horizon was producing in practice?

13 **A.** I don't recall that at all --

14 **Q.** Everything was perfect?

15 **A.** -- no. I don't know as I thought everything was
16 perfect, but I assumed that any -- that through
17 the problem management processes that are
18 implemented as part of Horizon going in, that
19 they would be picked up and dealt with.

20 **Q.** So when you picked up the IMPACT role, did
21 anyone, when you were briefed on the IMPACT
22 role -- what you were going to be doing -- say,
23 "We're looking to extend, essentially, the
24 functionality of the system in this way. There
25 have been problems in the operation on the

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1 **A.** Yes.

2 **Q.** That would be for many years, would that be
3 right, before Horizon came onstream, whilst it
4 was being rolled out, and for many years whilst
5 it was in operation?

6 **A.** Yes. So through my role as, initially --
7 because I worked in transaction processing, so
8 I knew the back end of it. I was given the role
9 of head of development which meant that I needed
10 to understand that and then, I say, as the
11 process architect and head of the operating
12 processes, I was considered an expert in the --
13 I suppose more of the accounting side of it
14 than -- I mean, I wasn't an expert in the
15 day-to-day, you know, running of a branch office
16 or a sub office, but I was an expert in the
17 accounting process through the various systems.

18 **Q.** You tell us in paragraph 5 that you were
19 promoted a number of times and held a number of
20 key roles reflecting that expert knowledge?

21 **A.** Yes.

22 **Q.** You've told us already that you're responsible
23 for accepting the Horizon System from
24 an accounting perspective?

25 **A.** Yes.

15

1 ground with Horizon"?

2 **A.** Not that I can recall, no.

3 **Q.** When did your role with the IMPACT Programme
4 come to an end?

5 **A.** I don't know, maybe 2005, 2006. So when the
6 programme was completed.

7 **Q.** What did you do after that?

8 **A.** I can't think, to be honest with you, where
9 I went next.

10 **Q.** Did it have anything to do with Horizon?

11 **A.** No.

12 **Q.** Until 2017, when you retired, did you have
13 anything more to do with Horizon?

14 **A.** Not that I can recall.

15 **Q.** So the last involvement with Horizon was at the
16 end of the IMPACT Programme in about 2005, 2006?

17 **A.** Yes, because next project was Horizon Online,
18 which I wasn't involved in. It was -- that was
19 Mark Burley's project.

20 **Q.** You tell us in paragraph 4 of your witness
21 statement -- no need to turn it up -- that you
22 became an expert and that you were highly
23 regarded in and for your knowledge of the
24 end-to-end business accounting processes
25 operated by the Post Office.

14

1 **Q.** So, at that stage, your involvement in the
2 initial implementation of Horizon was like
3 an expert customer; would you agree with that?

4 **A.** It was initially, definitely, yes. Because
5 I was an expert customer on behalf of
6 transaction processing.

7 **Q.** Did you, in the light of those roles and in the
8 light of your long service with the Post Office,
9 become aware that the accounting data would be
10 used -- the accounting data from Horizon would
11 be used not only for business purposes of
12 individual subpostmasters and the Post Office,
13 but also for the purposes of the audit of them,
14 the investigation of them and might result in
15 criminal or civil proceedings against them?

16 **A.** Yes, of course I was.

17 **Q.** You say "of course", just explain to us why "of
18 course"?

19 **A.** Well, because -- because that's what -- well,
20 I was in the Post Office for a long time, so
21 I understood all the processes of the post
22 offices and I understood that many people over
23 many, many, many years had been prosecuted
24 because they had false -- they had, primarily,
25 on the basis of signing a cash account saying it

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1 was accurate when it was paper, when it actually
2 didn't reflect the cash and stock that was in
3 the office.

4 **Q.** So you can confirm that you were aware that
5 Horizon and then Horizon plus IMPACT would be
6 producing data that would form the basis of
7 criminal and civil proceedings against
8 subpostmasters pursued by the Post Office
9 itself?

10 **A.** Yes.

11 **Q.** You tell us in paragraph 31 of your witness
12 statement -- perhaps if we can turn that up.
13 That's WITN03980100 at page 7.

14 **A.** Is that meant to be on my screen?

15 **Q.** It will come up on the screen. It's
16 paragraph 31.

17 **A.** Okay.

18 **Q.** It reads:

19 "It was agreed during the design of IMPACT
20 that the suspense account ..."

21 We're going to come back to the suspense
22 account and its removal in a moment.

23 **A.** I understand that, yes.

24 **Q.** "... would be removed, as historically it was
25 used by Subpostmasters to 'hide' discrepancies

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1 **A.** Yes, I would say that. So if you look back at
2 the record of people who had been prosecuted
3 successful in the past, prior to this, it was
4 normally that they would inflate their cash and
5 stock balances so that the account balanced or
6 they would be signing that that cash and stock
7 existed but it didn't balance or they would move
8 something into suspense, so the cash and stock
9 was right but there was something else that
10 wasn't -- basically, a suspense account is
11 saying there's an amount here I don't --
12 I haven't accounted for.

13 **Q.** You thought the solution for this was removal of
14 the suspense account because it would prevent
15 people from dishonestly hiding money within it?

16 **A.** Yeah, and I know you're going to ask me about
17 the contract in a bit but the contract said that
18 subpostmasters were required to, basically, make
19 that loss good, not to put it in a suspense
20 account and hide it.

21 **Q.** Presumably, if the aim or one of the aims of the
22 IMPACT Programme included the removal of the
23 suspense account to prevent dishonest
24 subpostmasters from hiding discrepancies in
25 their account, you carried out an analysis of

19

1 in their accounts, rather than resolve them."

2 **A.** Yes.

3 **Q.** The suggestion that subpostmasters hid
4 discrepancies in their account, on what basis
5 was that suggestion made?

6 **A.** This was a historic evidence. So on the basis
7 that when a subpostmaster signed their cash
8 account or pressed the button on Horizon, they
9 were saying that the cash and stock, as well as
10 the other transactions, but primarily that the
11 cash and stock that was in that account was
12 actually physically in the branch, and that was
13 the whole concept of it, that -- and a way to
14 get rid of that was to put an amount in suspense
15 which said that "I only have this cash and stock
16 and there's something over here".

17 So it was decided, given that the Finance
18 Director was my -- was the sponsor of my project
19 at the time and that was something that he
20 wanted to do, because --

21 **Q.** Who was the Finance Director?

22 **A.** Peter Corbett. So we wanted to get rid of what
23 was basically a place to hide discrepancies.

24 **Q.** Are you -- so "hide" in the sense of dishonestly
25 place; is that what you're suggesting?

18

1 the amount of money that was in suspense
2 accounts before Horizon was rolled out and then
3 after Horizon was rolled out?

4 **A.** No, I don't think so. This was a concept. We
5 were not -- there'd been nothing to suggest that
6 Horizon was creating discrepancies. I was never
7 informed of that.

8 **Q.** No, that's a different issue, whether it was
9 creating discrepancies. I'm asking if the aim
10 of the -- one of the aims of the removal of the
11 suspense account was to prevent dishonest
12 subpostmasters from hiding discrepancies, you
13 would want to see whether Horizon had
14 contributed to that, wouldn't you?

15 **A.** Well, Horizon wouldn't contribute to the
16 suspense account. Horizon didn't post anything
17 to suspense. The subpostmaster posted amounts
18 to suspense when they balanced and I would have
19 assumed that, if there were issues, those issues
20 would be reported to the call centre. But I was
21 not aware, nobody said to me, you know, "There's
22 been an increase in calls saying the accounts
23 don't balance", or anything.

24 That's what -- and in my programme, you
25 know, we had representatives from the support

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1 centre in Dearne, NBSC. So we had
 2 subpostmasters involved in all of those. So
 3 this was not a decision of my own. It was taken
 4 in conjunction with stakeholders throughout the
 5 business, including subpostmasters and branch
 6 offices. So ...

7 **Q.** Presumably now, you have heard that there were
 8 extreme problems with balancing on Horizon right
 9 from its outset?

10 **A.** I've heard that through being involved in this
 11 Inquiry but there was nothing, absolutely
 12 nothing -- you know --

13 **Q.** What did you think when you heard that evidence?

14 **A.** Well, I did wonder why I was never advised of
 15 that or why I wasn't aware of that.

16 **Q.** What did your wonderment lead you to think?

17 **A.** Well, I suppose it leads me to think that maybe
 18 I would have taken different decisions or looked
 19 at different things. I would not deliberately
 20 have removed it, you know, if I thought the
 21 system was causing misbalances.

22 **Q.** You said that the decision to remove the
 23 suspense account was a concept and wasn't based
 24 on evidence that Horizon had or had not
 25 contributed to any problem in the inflation of

21

1 **Q.** Did you think that "We need to conduct
 2 an analysis here to see whether Horizon is
 3 contributing to the problem", not because
 4 Horizon puts the money in suspense accounts, but
 5 it's creating discrepancies and balances --

6 **A.** I --

7 **Q.** -- that has meant that subpostmasters are
 8 putting more money in suspense accounts?

9 **A.** I wasn't aware that Horizon had made any change
 10 in the suspense accounts and we did have -- you
 11 know, in the programme and stuff, we did have
 12 the unions involved, we did have subpostmasters
 13 involved, and I will -- you know, I've taken
 14 an oath. I was not aware that the suspense
 15 account had increased as a result of Horizon.

16 **Q.** Did you look, as opposed to waiting for somebody
 17 to tell you?

18 **A.** No, I don't think so because I don't -- you
 19 know, somebody would have told me. The people,
 20 you know, involved in this would have told me
 21 about that. This was it was a design decision.

22 **Q.** That data would have been available to you. How
 23 much money is held in the suspense accounts at
 24 any one time?

25 **A.** I assume I could have got that, yes.

23

1 the suspense account, yes?

2 **A.** Yes, the suspense account could only be --
 3 matters would only go to suspense if the
 4 postmaster put them there, so Horizon didn't
 5 contribute for amounts in suspense. Horizon
 6 might have contributed for differences between
 7 the cash and stock that the system said they
 8 should have had and the cash and stock that they
 9 had.

10 I wasn't aware that any -- anything had been
 11 raised, if you like, by the subpostmasters or
 12 even branches -- not just subpostmasters,
 13 because if it was going to affect -- if the
 14 system was faulty, it would have affected Crown
 15 Offices as they were at the time, as well as sub
 16 offices, and there was nothing that I was aware
 17 of.

18 **Q.** For example, the Inquiry has heard from John
 19 Peberdy of the National Federation of
 20 SubPostmasters that by March 2001 there was
 21 £10 million held in suspense accounts, whereas
 22 18 months before, before Horizon had been rolled
 23 out, there was only £2 million held in suspense
 24 accounts.

25 **A.** I wasn't aware of that.

22

1 **Q.** So do I take it that neither you nor anyone that
 2 you asked to looked at, over time, this is the
 3 amount of money that has been held in suspense
 4 accounts and, if Mr Peberdy is correct, it's
 5 gone up, it's multiplied by five, before and
 6 after Horizon was rolled out?

7 **A.** No, I was not aware of that and, as I say, we
 8 did have -- we do have subpostmasters involved
 9 in the design, et cetera. So -- but nothing was
 10 ever raised with me, and I don't -- I'm assuming
 11 there's no evidence that, you know, anybody
 12 had -- that that was public knowledge, if you
 13 like, or that -- I know you're saying I could
 14 have found that but, you know, historically,
 15 that would have meant, you know, we looked at --
 16 we would have had to look at suspense accounts
 17 over time.

18 But it was a principle and that principle
 19 was signed off by -- including representatives
 20 of subpostmasters.

21 **Q.** Sorry, which principle was signed off?

22 **A.** The principle that we should remove the suspense
 23 account.

24 **Q.** Where did they sign?

25 **A.** Well, they would have signed off the design

24

1 document.

2 **Q.** So the -- just explain: the National Federation
3 and the CWU would sign a document, would they?

4 **A.** Well, they would review it, they would be
5 reviewers. So they would have been engaged in
6 the -- they were engaged in the programme.

7 **Q.** So we should look at the conceptual design and
8 other similar documents for the names of people
9 from the Federation and the CWU and, seeing
10 those names, should take that as meaning that
11 they had signed off what was being done in the
12 name of their union; is that what you're
13 suggesting?

14 **A.** That's what I'm saying. Whether that's -- you
15 know, it's a long time ago, whether they
16 actually signed off the conceptual design in
17 total, I don't know. But we did have a lot of
18 representation throughout the design phase.

19 **Q.** That representation, do you mean presence at
20 meetings?

21 **A.** Well, document reviews, yes, and stuff like
22 that. Given that, you know, impact was
23 primarily -- primarily -- about implementing new
24 back office systems which would automate the
25 back office systems. So it wasn't about

25

1 accounts."

2 Yes?

3 **A.** Yes.

4 **Q.** The suspense account had been designed, is this
5 right, to allow subpostmasters to balance, even
6 where there was an imbalance?

7 **A.** Yes, and that was -- that had been there for
8 years and years when we were talking about paper
9 cash accounts. So it was just a way for them
10 to -- I suppose there were two things. It would
11 be one for branches that just couldn't find what
12 the problem was but it was also used for
13 branches that had been removing money from the
14 system, if you like, and it was to hide it for
15 a length of time.

16 So I mean we had a lot of the sort of people
17 who investigated, POID investigations and a lot
18 of investigations into previous cases where
19 people had jailed before Horizon existed, so
20 this was on a paper cash account, you know, that
21 they used suspense to hide that. They would
22 either leave their cash and stock as numbers
23 that didn't exist in the office or they would
24 simply move it to a suspense account.

25 **Q.** The language which you use in your witness

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1 re-looking at Horizon, except that obviously
2 there were a lot of Horizon changes because it
3 had to produce the data feed that would go into
4 the back office systems.

5 But really, we were -- IMPACT was what,
6 a £25 million programme and there were lots of
7 different streams in it, you know. But really
8 the implementation of the back office systems
9 was there, but -- and I -- if I'm honest,
10 I can't remember where the idea of removing the
11 suspense came out, but certainly, as I say,
12 Peter Corbett, who was my sponsor, I know was
13 very keen on it.

14 **Q.** Can we look at paragraph 24 of your witness
15 statement, please. That's on page 5. It's at
16 the foot of the page. You're speaking here
17 about the removal of the suspense account, and
18 you say:

19 "This decision was based on the core
20 principle that branches (specifically agency
21 branches) were accountable for the financial
22 integrity of their accounts. The 'suspense
23 account' had been historically used to 'balance'
24 any discrepancies which covered up losses in
25 their [I think you mean subpostmasters']

26

1 statement and today is of hiding and covering
2 up. Does that accurately reflect your core
3 belief that that's what was going on?

4 **A.** I have to say, you know, that, yes, multiple --
5 many, many, many subpostmasters, prior to
6 Horizon, had been prosecuted for either -- for
7 falsely accounting, basically. Either saying
8 the cash and stock was there or hiding it in
9 suspense, and I could tell you lots of cases,
10 you know, of somebody where the auditors --
11 because the auditors only used to audit sub post
12 offices, I think, once every three or
13 four years.

14 And I can remember there was one, I think it
15 was, Harrow on the Hill was quite infamous,
16 where the auditors turned up at the door,
17 because that's what they did, and he said,
18 "I want to fetch the keys out of my car", and
19 then he went; and that was it. And the Finance
20 Director -- so, you know, I ran this on behalf
21 of my sponsor, the Finance Director, but it was
22 clear that -- and I'm not disrespecting any of
23 the people that have been jailed if Horizon was
24 wrong, but there had been many people --

25 **Q.** Sorry, you said "if Horizon was wrong".

28

1 A. Yes. Well, I -- I'm not doubting it was wrong.
 2 I'm just saying I haven't --
 3 Q. So can we remove "if" from that sentence?
 4 A. Yes, okay. But people had been jailed for many,
 5 many years for false accounting because that's
 6 what they got jailed for.
 7 Q. So is it fair to say that this mindset, might
 8 I call it, that you operated under was that
 9 suspense was all about crime, it's about
 10 cover-ups by dishonest postmasters hiding
 11 discrepancies, and that mindset continued in
 12 your 40 years in the Post Office?
 13 A. Well, I wasn't 40 years in the Post Office.
 14 I was in Royal Mail and things before that.
 15 So -- but once I was involved in that -- it
 16 wasn't me, you know, I had a sponsor for this,
 17 who was the Finance Director and we were trying
 18 to achieve something that meant that accounts
 19 were accurate and that the cash and stock that
 20 was in the office or the accounts were accurate
 21 and that the cash and stock that was in the
 22 offices was in the offices.
 23 Q. Would you mind kindly answering my question?
 24 A. Could you repeat the question, please?
 25 Q. Yes. Did you have a mindset in the entirety of

29

1 to be fraudulent.
 2 Q. It could be that their account imbalanced and
 3 they didn't know why it imbalanced?
 4 A. That's true, but that's what I said. That's --
 5 so that there were discrepancies that they
 6 couldn't explain.
 7 Q. So the suspense account was there to allow
 8 subpostmasters to balance where there was
 9 an imbalance?
 10 A. Yes.
 11 Q. If there was a shortfall, the relevant sum would
 12 be put into, moved into, the suspense account,
 13 returning the branch to balance, permitting the
 14 subpostmaster to roll over and continue trading?
 15 A. Yes.
 16 Q. The reason for the shortfall, would you agree
 17 with this, there could be various reasons: it
 18 could be a loss within the branch for a range of
 19 reasons?
 20 A. It could be but then subpostmasters were
 21 responsible for those losses.
 22 Q. That's a different issue.
 23 A. So they should have declared that a loss.
 24 Q. Sorry, they should have?
 25 A. Should have declared a loss rather than put

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1 your time working for Post Office, that the
 2 suspense account was used by dishonest
 3 subpostmasters to hide and cover up money that
 4 they were taking?
 5 A. My mindset was that it was a place where they
 6 could do that.
 7 Q. And did do that?
 8 A. Yes, and did do that, because --
 9 Q. And that it wasn't used for any other purpose?
 10 A. Well, it might have been used for any other
 11 purpose. It might have been used for other
 12 purposes as well, but there were other ways
 13 those things could have been dealt with.
 14 Q. Did you think it was used for any other purpose,
 15 like an innocent purpose?
 16 A. I don't know. It could have been.
 17 Q. Well, did you? Can you help?
 18 A. I don't -- I can't remember. All -- I think it
 19 could be used. I'll rephrase it then. It could
 20 be used for any purpose but why would you, if
 21 your account balanced? So it must have been to
 22 do with something that either they knew was
 23 causing their account to misbalance or because
 24 their account misbalanced and they needed
 25 somewhere to put the difference; it didn't have

30

1 an amount in suspense.
 2 Q. Well, they might not know, might they? You seem
 3 to be operating on the basis that it must be
 4 nefarious and, if that's the basis on which you
 5 were operating, then you should say so.
 6 A. It was -- yes. Their account should have
 7 reflected what they saw -- what was in their
 8 office. It should have reflected the receipts
 9 and the payments they had made and the cash and
 10 the stock that then -- so they'd have done the
 11 previous opening cash and stock on their
 12 previous cash account, they would have done
 13 a number of transactions which would be recorded
 14 and the difference should have given them
 15 an amount of cash and stock that was in the
 16 office.
 17 Q. The reasons could include theft by the
 18 subpostmaster?
 19 A. Yes.
 20 Q. They could include poor business practices by
 21 the subpostmaster?
 22 A. Yes.
 23 Q. They could include a negligent mistake by the
 24 subpostmaster?
 25 A. Yes.

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1 Q. They could include an innocent mistake?
 2 A. Yes.
 3 Q. They could include, after Horizon, a bug or
 4 error in the system causing an imbalance?
 5 A. They could.
 6 Q. Then if the sum was placed in suspense, that
 7 could be investigated before Horizon at
 8 headquarters?
 9 A. I think the thing was that they had the
 10 Network -- the Network Support Business Unit was
 11 set up within Horizon, was there, and that
 12 should have been the place -- you know, the
 13 contract said they should make good their
 14 losses. There was nothing that was a sort of
 15 grace period in them. But I would have thought
 16 if somebody was having large losses, they would
 17 have been raising hell with the support centre.
 18 Q. On the phone?
 19 A. Yes, or with their Retail Line.
 20 Q. Just explain what you mean by their "Retail
 21 Line"?
 22 A. Well, every post office was linked to Post
 23 Office's -- somebody in the Retail Line. So
 24 through -- and I'm not an expert in the Retail
 25 Line structure but they would have people who

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1 it could be investigated by Chesterfield or by
 2 the audit and security team, yes?
 3 A. Yes.
 4 Q. Then after IMPACT that could still happen, there
 5 could still be an investigation but, after
 6 IMPACT, placing the item in suspense could no
 7 longer happen, could it?
 8 A. No, but you're saying, exactly the same
 9 resolution of what somebody thought, because
 10 clearly they would know if they hadn't --
 11 couldn't put it in suspense that there was
 12 a difference between the cash and stock on what
 13 the cash account said and, you know, their
 14 contract did they say had to make it good, they
 15 could have been straight on the phone to Network
 16 Business Support Unit saying, "This is saying",
 17 -- I'm assuming, you know, we're not talking,
 18 I expect, £10 or 10 pence here; we're talking
 19 large amounts generally. If it's small amounts,
 20 making it good was what they would do but if it
 21 was a large amount, you would have thought they
 22 would have been scouring their transaction logs
 23 and trying to understand what had happened
 24 there.
 25 Q. Scouring their transaction logs. Can you tell

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1 supported their office from the Network Business
 2 Unit.
 3 Q. What would you expect them to do if they said,
 4 "There's an imbalance here, I don't know why
 5 there's an imbalance. I think it may be being
 6 caused by the system but I don't know why"?
 7 A. Well, I would have expected them to investigate
 8 that.
 9 Q. How would they investigate it?
 10 A. I don't know because I'm -- I've never worked in
 11 the Network side so I don't know what the roles
 12 and how they played those roles in that. But
 13 somebody would be saying, you know, "You have to
 14 go through your accounts", and a lot of the
 15 lines on the cash account had supporting
 16 documents, so is it a loss in a supporting
 17 document? But that was it.
 18 I mean, clearly, you know, some offices did
 19 more transactions than others. Was there
 20 a transaction that they keyed wrong? But there
 21 must have been a way of investigating that, but
 22 that wasn't, you know, my role. I wasn't
 23 involved in Network support at all.
 24 Q. The difference before and after IMPACT was,
 25 before IMPACT, if a sum was placed in suspense,

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1 us how a subpostmaster in a branch scours
 2 a transaction log?
 3 A. Well, they would print it off and have a look
 4 for what they thought might be an erroneous
 5 transaction but a lot of the --
 6 Q. Hold on. Just stop there. What would they
 7 print off?
 8 A. I can't remember. There must have been a report
 9 that was a transaction log.
 10 Q. Was there a report called a transaction log?
 11 A. I don't know.
 12 Q. Sorry?
 13 A. I don't know. But, you know, every week
 14 before -- and before any of the automation,
 15 people went through that on a weekly basis,
 16 following automation that became a monthly
 17 basis, although I imagine that some offices
 18 still did it weekly. A lot of lines on the cash
 19 account had supporting documents and that
 20 enabled them to check the accuracy of those
 21 things. So nothing changed as a result of doing
 22 this in how you would try and identify
 23 a discrepancy. It just said you can't place it
 24 in somewhere -- in a suspense account.
 25 Q. You've said a number of times this morning it

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1 was their responsibility to make good any
 2 losses.
 3 **A.** Mm-hm.
 4 **Q.** It was their responsibility under the contract,
 5 I think you said, a number of times.
 6 **A.** Yes, there is a clause, I know, that's in the
 7 contract that's in some of my documents.
 8 **Q.** Yes, if we just look, please, at paragraph 24 of
 9 your witness statement, that we were on, and see
 10 what you say about the responsibility of
 11 subpostmasters for shortfalls under the terms of
 12 their contract. You say:
 13 "This decision was based on the core
 14 principle that branches (specifically agency
 15 branches) were accountable for the financial
 16 integrity of their accounts."
 17 Then reading on:
 18 "The processes for raising a dispute
 19 regarding a discrepancy were not changed by the
 20 Programme. Branches were supported by the
 21 helpdesk and/or the Network team and would raise
 22 any concerns through these channels."
 23 Then you say:
 24 "As I have stated, agency branches were
 25 responsible for making good losses. This

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1 some of the documents in my folder, there is
 2 a copy of that paragraph.
 3 **Q.** When you were working back in -- say, between
 4 '95 and 2005, was it your belief that
 5 subpostmasters had to make good any and all
 6 shortfalls?
 7 **A.** Yes, although if you're going to ask me, if the
 8 system didn't work right, they were responsible
 9 for that, then no. But they were, unless, you
 10 know, they could -- there was a bug and it was
 11 identified. I'm not suggesting that if the
 12 Horizon System didn't work correctly, that they
 13 were liable for that but the contract said, if
 14 you've done these transactions, you've reviewed
 15 your account, when you press the button you're
 16 saying that account is a true and accurate
 17 statement of the transactions.
 18 **Q.** Where did, between '95 and 2005, your
 19 information come from that subpostmasters were
 20 required under their contracts to make good any
 21 and all shortfalls?
 22 **A.** Because we had -- because I had copies of the
 23 contract.
 24 **Q.** You had copies of the contract in your office or
 25 in folders?

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1 principle was not changed by the IMPACT
 2 Programme."
 3 Then in paragraph 25, if we scroll down, you
 4 say:
 5 "This decision was based on the core design
 6 principle that, contractually, agency branches
 7 were accountable for the cash and transactions
 8 in their branch and liable to make good any and
 9 all shortfalls."
 10 I just ask you to highlight, in your mind at
 11 the moment, "any and all shortfalls". If we go
 12 to paragraph 29, please. You say:
 13 "In sub post office [sub post offices] the
 14 owners were required under their contract to
 15 make good any shortfall."
 16 I just ask you again to highlight in your
 17 mind the words "any shortfall".
 18 Then in paragraph 32, over the page:
 19 "In contractual terms, they were liable,
 20 contractually, for any shortfalls which had to
 21 be made good."
 22 Why did you believe that subpostmasters were
 23 required, under their contracts, to make good
 24 any and all shortfalls.
 25 **A.** Because I think -- I'd seen the contract and, on

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1 **A.** Yes, or somebody -- we would have had people in
 2 the teams or stakeholders who were not in the
 3 team that confirmed that. So, you know, I mean
 4 this was a -- you know, this was something --
 5 I didn't make these things up. I was -- you
 6 know, my stakeholder was the Finance Director,
 7 and this was something that we recognised and,
 8 certainly as far as I'm aware, we tracked all
 9 the contractual terms to say that was true.
 10 **Q.** To summarise, it was based on actual possession
 11 of the contracts and conversations with other
 12 experts who would be expected to know what the
 13 terms of the contract were?
 14 **A.** Yes.
 15 **Q.** Did it mean to you that a shortfall that was not
 16 the fault of a subpostmaster was nonetheless
 17 their liability to make good?
 18 **A.** No. Well, except that it could have been, you
 19 know, a member of staff or something like that.
 20 If there was a shortfall because they'd had
 21 a robbery, then clearly that didn't apply and if
 22 I'd thought in any way that the system created
 23 incorrect transactions that they wouldn't be
 24 able to question, then no, I wouldn't expect
 25 them to be held liable.

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1 Q. In your statement, you say on four occasions
2 that they had a liability under their contract
3 to make good any or, in another place, any and
4 all shortfalls, without including exceptions.
5 You've just written in --

6 A. Yes, but I didn't -- I -- you know, anybody
7 would say, if you've got an account and you've
8 signed it off, yeah, you're signing it off to
9 say that that is a true and accurate reflection.
10 And, you know, I know from reading the stuff
11 here that there were issues maybe in Horizon
12 but, in many cases, you know, what I don't
13 understand and I don't know the detail of the
14 prosecutions, there's -- why they hadn't been
15 able to identify that the system had inflated,
16 you know, receipts or said they hadn't -- that
17 sort of thing.

18 Because, you know, the process of balancing
19 required them to go through their accounts and
20 to check things, as I say, in many cases with
21 supporting documents, not always supporting
22 documents.

23 Q. Sorry, just to stop there, you're saying that
24 the process of balancing --

25 A. Yes.

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1 office systems in Chesterfield, we would have
2 a feed from the client which told us. So we
3 would identify errors but that -- those
4 subpostmasters should have been able to find
5 those errors. If they'd sent the supporting
6 documents off, they -- some of them may have
7 been sent off at the same time as the cash
8 account was completed and, therefore, they would
9 be saying, "I have -- my system says I've done
10 these transactions and these supporting
11 documents say I've done these transactions", and
12 if there was a difference they would look to
13 identify the difference.

14 So it wasn't a case of just pressing
15 a button. It was all related to supporting
16 documents and other information, to sign a cash
17 account off.

18 Q. Getting back to where we were, I think you've
19 said that you didn't work on the basis, between
20 1995 and 2005, that all shortfalls were the
21 responsibility of subpostmasters to make good.
22 There were exceptions to that rule?

23 A. Well, yes, there was a process for them to go
24 through to work out why they had got
25 a shortfall, so --

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1 Q. -- required the subpostmaster to go through
2 a series of documents, this is after Horizon?

3 A. Yes, well, they'd go through a process that
4 they'd done with the cash account. They would
5 validate the lines that were on the cash
6 account. So, for instance, if -- and obviously
7 things changed as technology changed but if they
8 were having Giro deposits, for instance, they
9 would have Giro deposit slips. So the process
10 of balancing would say, "I've got a line on my
11 system that says I've taken this much in cash
12 deposits", and you would expect that they would
13 go through the supporting documents, which often
14 had to be sent in when we used to have paper
15 cash accounts, because that's what Chesterfield
16 would do when they got it.

17 They would check the lines on the cash
18 account that the subpostmaster had submitted to
19 the supporting documents --

20 Q. Just to stop you there, that's what IMPACT
21 removed, essentially?

22 A. It didn't remove supporting documents.

23 Q. They removed the checking by Chesterfield?

24 A. Well, no, because there would always -- there
25 was still some products where, in the back

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1 Q. What were the exceptions to the rule?

2 A. Well, if they could -- if they could prove that
3 they got a set of supporting documents and that
4 total on Horizon wasn't there, they should have
5 been -- they would have been ringing the
6 helpdesk and saying, "Why is my system not
7 reflecting what I've keyed in?"

8 Q. What if the helpdesk said, "But you've got
9 a responsibility under your contract to make
10 good any and all shortfalls. Make good the
11 shortfall, otherwise you can't continue
12 trading"?

13 A. No, that contractual term "any shortfalls" is,
14 after all these processes have gone. If they
15 can't resolve that shortfall, that's what the
16 contract said.

17 Q. What was your view of how onerous the
18 contractual provision on any and all shortfalls
19 was at the time?

20 A. Well, that provision was no more onerous under
21 IMPACT than it had been for all the years it had
22 been they're so that contract -- that was --
23 that had always been the case in subpostmasters
24 contracts, as far as I'm aware. Certainly in my
25 time of being involved, that was what was there.

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1 Q. Can you recall a difference between sub offices
2 and Crown Offices in this regard?
3 A. Yes, because Crown Offices would report a loss.
4 So you don't hold a Crown branch -- were not
5 under the same contract. They were employed --
6 they were employees, so you would deal with
7 an employee who -- a branch manager who reported
8 that they had got more money than they really
9 had in their tills, you would treat them
10 differently. That would be a disciplinary
11 offence and may lead to them being prosecuted,
12 I suppose. But it's obviously a different
13 contractual situation.
14 Q. One of the desired outcomes of the IMPACT
15 Programme was to pursue losses with more vigour
16 in order to improve debt recovery, yes?
17 A. Yes.
18 Q. Did you ever think that subpostmasters were
19 therefore going to be pursued and pushed harder
20 for losses?
21 A. I think we were trying to make it easier for
22 those losses to be identified and, yes, I would
23 expect that the processes would be there -- the
24 process should have been there anyway, but it
25 was trying -- it was the visibility.

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1 here to implement a project, there was
2 a programme -- project programme manager and
3 I had a number of sponsors, and they had numbers
4 of requirements.
5 Q. But you were aware, you were conscious of the
6 fact that one of the aims of the project was to
7 pursue these losses harder in order to improve
8 debt recovery --
9 A. Yes.
10 Q. -- and therefore subpostmasters would be pushed
11 harder?
12 A. Yes.
13 Q. That was the very aim of the process?
14 A. Of that part of the process, yes.
15 Q. Can we just look at a couple of versions of the
16 contract please. To start with, look at
17 POL0000747. This is the 1994 edition of the
18 subpostmaster contract and can we turn to
19 page 49, please. Hmm.
20 Yes, sorry, internal pagination. So I think
21 four pages on.
22 Yes, that's it, under the cross heading
23 "Losses" at the top and if we can look at
24 paragraph 12:
25 "The Subpostmaster is responsible for all

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1 Q. But a deliberate design aim was essentially to
2 squeeze the subpostmasters more to get onto the
3 Post Office books the accounts that was
4 otherwise held in suspense accounts? That was
5 improving debt recovery?
6 A. Yes, I don't think that means squeezing them
7 more. That's a concept --
8 Q. But --
9 A. We were trying to make it that the Post Office
10 accounts and the sub office accounts reflected
11 reality and that we didn't have, if you like,
12 a black hole that was called suspense.
13 Q. But a black hole that was filled by, in your
14 view, dishonest subpostmasters hiding and
15 concealing money that they had stolen?
16 A. It didn't mean they'd stolen it. It may have
17 been lost. They may have given out the wrong
18 change to somebody but the contractual liability
19 was that they should make good those losses,
20 even if they'd given out the wrong change.
21 I wasn't -- I'm not -- I wasn't in any way
22 reflect interesting on why I believe those
23 losses had occurred.
24 I was simply reflecting what was a desire of
25 the sponsors of my project, remembering I was

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1 losses caused through his own negligence,
2 carelessness or error, and for all losses of all
3 kinds caused by his Assistants. Deficiencies
4 due to such losses must be made good without
5 delay."
6 A. Yeah.
7 Q. Can you keep that in mind and then if we can
8 look at POL00003874. This is the "Post Office
9 Community Subpostmasters Contract" for 2006.
10 Can we look, please -- there's an error with my
11 referencing.
12 I'm going to have to ask to take the break
13 early because I can't locate the paragraph
14 within the 60 pages/70 pages of the document.
15 Apologies for that.
16 A. I think on --
17 **SIR WYN WILLIAMS:** So we're just after 11.00, so
18 11.15?
19 **MR BEER:** Yes, that would be great. Thank you very
20 much, sir.
21 **(11.05 am)**
22 **(A short break)**
23 **(11.16 am)**
24 **MR BEER:** Sir, thank you for allowing me the time.
25 The fault was entirely mine.

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1 **SIR WYN WILLIAMS:** It's always nice to have that
 2 admission.
 3 **MR BEER:** So we were looking at POL00003874, please.
 4 Can we turn to page 71 in the document, please,
 5 and paragraph 12, please:
 6 "The subpostmaster is responsible for all
 7 losses caused through his own negligence,
 8 carelessness or error, and also for losses of
 9 all kinds caused by his Assistants.
 10 Deficiencies due to such losses must be made
 11 good without delay."
 12 I've shown you the contract as it stood in
 13 1994 and then as it stood in 2006, to sort of
 14 bookend the period that we're looking at.
 15 You'll see that they are materially the same.
 16 **A.** Yes.
 17 **Q.** Do you agree that a postmaster's losses due to
 18 his own negligence, carelessness or error is not
 19 the same thing as a postmaster being liable for
 20 any and all shortfalls, irrespective of their
 21 cause?
 22 **A.** Yes, because it describes those that they are
 23 liable for.
 24 **Q.** Why did you say, in four places in your witness
 25 statement, that subpostmasters were liable to

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1 I just paraphrased the contract, which was the
 2 first bit, for all losses.
 3 Clearly, we were not ever attempting to
 4 make, in my project, losses -- subpostmasters
 5 responsible for losses which were caused by
 6 a system bug.
 7 **Q.** Isn't it the case that what you told us in four
 8 places in your witness statement accurately
 9 reflected the view that you held at the time,
 10 back in the day, namely subpostmasters are
 11 responsible for any and all losses, and that's
 12 the basis on which you were working, wasn't it?
 13 **A.** No, I would have had access to this and we --
 14 you know, I wouldn't have --
 15 **Q.** But did you read it?
 16 **A.** I would never -- you're asking me to go back
 17 20 years but I had people from the Network,
 18 I had people from commercial involved and that
 19 was where those decisions were made. It was
 20 never intended to suggest that if there were
 21 bugs in the Horizon System caused by Fujitsu,
 22 that that wasn't there. I suppose what we would
 23 have expected is -- maybe thought, is that those
 24 would have been identified by the subpostmasters
 25 because, I say, a lot of the lines on the cash

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1 make good all or any and all shortfalls?
 2 **A.** Because I was meaning that it was like that.
 3 Clearly, if there was -- you know, it was a loss
 4 that was a system error, that wouldn't have been
 5 the same. Because you would have resolved the
 6 system error. But, you know, this was not
 7 something that I would have thought would have
 8 happened but --
 9 **Q.** What wouldn't you had thought have happened?
 10 **A.** I would have thought that somewhere somebody
 11 would have reported things that were happening,
 12 would have been able to identify maybe which of
 13 the transactions there was a problem with, and
 14 then that would have got resolved.
 15 And that was a Network -- that would have
 16 been an issue for the Network because you would
 17 have imagined that if you were getting a lot of
 18 losses caused in a lot of offices which they
 19 simply couldn't explain, that through that
 20 process they had to go, which was before they
 21 signed off the cash account, that things would
 22 have been clear, particularly if there were
 23 large losses. You know, you would have expected
 24 you could see something in the accounts, but
 25 I wouldn't -- that contract has never -- and

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1 account, as it was, had supporting documents,
 2 which they would be able to say "Well, this is"
 3 -- and I don't know what problems those bugs
 4 caused, I know they existed now but I didn't
 5 know at the time. But I would have thought you
 6 would see a pattern of losses occurring because
 7 this line of receipts is overstated versus some
 8 supporting documents or evidence that I had to
 9 support it.
 10 **Q.** Were the attitudes that you have displayed in
 11 your witness statement, namely that suspense
 12 accounts are used by dishonest subpostmasters to
 13 hide and cover up losses for money that they
 14 have taken and that, in any event,
 15 subpostmasters are liable for any and all
 16 losses, a common one in the teams in which you
 17 worked?
 18 **A.** No, it was not like that at all, not like that
 19 at all. This was about trying to reflect that
 20 part of the contract and this was a requirement
 21 passed to me from my sponsor, the Finance
 22 Director, and that's what we intended to try to
 23 implement.
 24 **Q.** Can I turn to the reasons for the removal of the
 25 suspense account. You tell us in paragraph 18

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1 of your witness statement -- and can we look,
2 please. It's on page 5, WITN03980100. We
3 should probably just look at the foot of 17
4 first. It's slightly oddly formatted:

5 "The principle objectives-off IMPACT [says
6 17] were to ..."

7 Then 18:

8 "Deliver an integrated, automate solution
9 utilising industry standard packages where
10 possible."

11 I think the second thing is:

12 "Reduce IT operating costs."

13 Then the third thing is:

14 "Reduce losses and improve debt recovery."

15 Was the objective that you've described
16 there, reducing losses and improve debt
17 recovery, something of an underestimate? This
18 was seen as an issue critical to the survival of
19 the business, wasn't it?

20 **A.** No. No. This was -- I worked for the
21 Finance -- the Finance Director was my sponsor,
22 you know, we did have a lot -- we had a very
23 large network of offices which were not
24 supervised, which were not audited frequently
25 and we did have, prior to any of the automation,

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1 **A.** Yes, I would have been a -- not just reviewed,
2 I would have been the final sign-off along with
3 Clive Read who was the -- he was the
4 technical -- so I was the programme manager but
5 he was technical design authority.
6 **Q.** We can see you described as "Programme Manager"
7 on the first page there. What did the role of
8 programme manager involve?
9 **A.** Right, so this was a significant programme so
10 originally I was -- because I said I was sort of
11 head of design, or whatever it was at the time,
12 so I was asked to design an improved process
13 that would meet these -- meet some of these
14 objectives. And then, having created that
15 design, which is not this conceptual design,
16 this is later on, I was then asked to move to be
17 programme manager to implement it and, as I say,
18 my sponsor was Peter Corbett who was the Finance
19 Director.

20 So those desires to reduce losses were
21 passed to me as a requirement from the sponsor.

22 **Q.** We can see, I think, the date on page 5 of the
23 document -- at the foot of the page, 3.4, which
24 is what this version is -- is September 2003,
25 and you can see the date above that in the box,

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1 numbers of postmasters who were prosecuted for
2 false accounting: not theft but false
3 accounting.

4 So these were agreed. This wasn't my, you
5 know, my programme. It was the Finance
6 Director's desire to do this and that was one of
7 things he placed on us to say, "Do that, that's
8 one of the things that we want you to achieve
9 out of this programme".

10 **Q.** So it was actually more targeted to try to catch
11 or remove the facility for those dishonest
12 subpostmasters to hide or cover up losses in
13 their suspense account.

14 **A.** Yes, absolutely.

15 **Q.** That was an aim?

16 **A.** Absolutely.

17 **Q.** Can we look, please, at POL00038870.

18 This is version 3.4 of the conceptual design
19 of the accounting and cash management programme.
20 We'll see in a moment that I think it's dated
21 September 2003 and it details the design of the
22 whole accounting and cash management programme.
23 I think it was reviewed by you, is that right,
24 as the programme manager for the entirety of the
25 programme.

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1 yes?

2 **A.** Yes.

3 **Q.** Then if we go forwards, please, to page 14.

4 Under paragraph 3.2.2, which is just under the
5 middle of the page, "Key priorities", the
6 document provides that:

7 "2 fundamental changes have made Post Office
8 Limited's funding position a critical business
9 survival issue:

10 "[1] The business is trading at a loss

11 "[2] The migration of benefits to ACT will
12 be accompanied by the loss of pre-funding by
13 government departments of the necessary cash in
14 the network.

15 "The business now has to borrow funds to
16 fund its trading losses and to fund working
17 capital needed in branches. Such borrowing is
18 limited in its availability and its costs add to
19 the trading loss. From April 2003 DTI will
20 provide a loan and will require a robust
21 statement of cash holding as security."

22 Does that neatly summarise the reasons for
23 the IMPACT Programme?

24 **A.** No, not in totality, because the IMPACT
25 Programme, a lot of it, which will come in the

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1 business drivers, no doubt, was to -- we'd
2 automated the front office through Horizon, and
3 IMPACT -- a lot of that, was around automating
4 the back office, so we replaced the old paper
5 cash account and put in new systems. So the
6 majority of IMPACT was all about the back office
7 systems, really, and then doing some things in
8 the front office to facilitate that.

9 But it wasn't -- so that was the reason for
10 it, really.

11 **Q.** The purpose of it, or the reasons why it was
12 being done, are set out there, aren't they?

13 **A.** Well, yes. So we were trying to reduce the
14 costs. So by replacing the old systems and
15 putting in new -- we'd put in a SAP system in
16 the back end, which was very vanilla. We tried
17 not to change SAP to work to the processes -- we
18 tried to change the Post Office processes to fit
19 with the package.

20 So yes, putting in package solutions in the
21 back end meant significant savings and much
22 better control, et cetera. So that was one of
23 the reasons behind that.

24 **Q.** Were suspense accounts to be removed because the
25 Post Office desperately needed money that was

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1 account. So yes, this was, so there were
2 a number of things that said "How do we reduce
3 the cost or the loss of the business?" And
4 I can't remember where that actual thing about
5 the suspense account came up from, because we
6 did number of workshops, you know, to develop
7 obviously the programme and what it was going to
8 look like but it was driven by -- and we had all
9 key stakeholders involved.

10 So we would have had people from the counter
11 who would have said, you know, ultimately, we
12 have a lot of losses in the network.

13 **Q.** Do I take from that that it wasn't part of the
14 initial plan to remove suspense accounts? That
15 was something that was added as the programme
16 developed?

17 **A.** Yes, it might have been before we set off on the
18 programme because, as I say, I was -- I had
19 a business architecture some of the time, so
20 I was involved in that role or targeted to look
21 at ways to improve that end-to-end process, and
22 particularly in an accounting sense because,
23 I say, I did have -- this project was sponsored
24 by Finance.

25 **Q.** Can I turn, then, to look at responsibility for

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1 held in suspense accounts?

2 **A.** No, it wasn't because it was desperately needed,
3 it was just while we were making changes to the
4 front end, and I say, it was a -- I can't really
5 remember the -- where it came from, but it would
6 have been an idea that our losses were
7 significant and were there ways to change those?
8 And some of those would have been losses not --
9 nothing to do with the counter.

10 They would have been losses because we
11 couldn't agree at the back end how much we owed
12 our clients or they owed us, for example. So it
13 was a very large programme and the removal of
14 the suspense account in the counter was a very,
15 very small part of it. It wasn't a big driver
16 for it at all. We wouldn't have done this
17 programme just to do that.

18 **Q.** Why was the suspense account removed?

19 **A.** Because it was seen as a place where people
20 would hide losses.

21 **Q.** So it wasn't primarily aimed at getting the
22 money that would otherwise be in the suspense
23 account to reduce Post Office debt?

24 **A.** No, losses ultimately -- it's not about debt.

25 Losses ultimately appear in your profit and loss

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1 the designing out of the suspense account
2 facility and start by addressing what
3 Chesterfield did before the IMPACT Programme
4 designed out the local suspense account and
5 therefore how it was changed by IMPACT. Can we
6 start with paragraph 7 of your witness
7 statement. That's on page 2.

8 Thank you. At the foot of the page, you
9 say:

10 "When Horizon was initially implemented it
11 was built to replicate the accounting processes
12 that were historically in place. This meant
13 that a 'cash account' was still produced by
14 Horizon as this was needed to feed the 'back
15 office' accounting systems and processes in
16 place [at] Chesterfield."

17 Was there, essentially, a reconciliation and
18 checking process undertaken at Chesterfield?

19 **A.** Yes, so we had a -- there were probably at one
20 time 150 people in what was called transaction
21 processing. The cash accounts were produced by
22 the system. Obviously, pre-Horizon we had paper
23 cash accounts coming in to a keying unit in
24 Chesterfield, so there was a big process to key
25 those cash accounts, which by itself could have

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1 created errors in the process, and then we
2 had -- the remainder of that unit in transaction
3 processing was a large number of teams of what
4 were called error resolution teams.

5 So their job was to understand the
6 difference between -- to resolve errors. And
7 errors were created by -- often by either us
8 getting a separate feed from the client because
9 that's what the Post Office did, work on behalf
10 of clients, it wasn't -- we weren't selling our
11 own products or services. We were acting on
12 behalf of clients.

13 So for many of the products, we would get
14 a feed from Horizon of what the branches were
15 saying on the cash account and then we would get
16 a feed from the client and a whole mass of error
17 notices would be produced and then that all had
18 to be dealt with by the teams in Chesterfield.

19 Q. So this 100, 150 people at Chesterfield --

20 A. Yes.

21 Q. -- was essentially manual reconciliation but
22 based on weekly production of the cash account
23 by Horizon?

24 A. Absolutely. So this programme was intended to
25 stop that. It was to put in a SAP system. So

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1 errors, chase them down until they were
2 corrected and resolved, either in the cash
3 centre or in the cash accounting system of
4 subpostmasters?

5 A. Yes, and that hadn't changed from pre-Horizon,
6 if you like. That's -- the systems and the
7 processes in the back end were exactly the same,
8 and so IMPACT was all about really addressing
9 that issue.

10 Q. So the purpose or one of the purposes of the
11 IMPACT programme was to introduce automation to
12 remove that manual reconciliation process to
13 investigate, amongst other things, errors and
14 discrepancies?

15 A. Yes.

16 Q. If errors and discrepancies persisted, even
17 under the automated back-end functions, who was
18 to investigate those, under this new system?

19 A. Well, there was still a team in Chesterfield and
20 it was still their responsibility to do that.

21 Q. How many people were in the team in Chesterfield
22 post-IMPACT?

23 A. I can't remember, sorry.

24 Q. Was it still at the 100, 150 level?

25 A. It would have been less than that but it

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1 that's what I said. The changes at the branch
2 were minimal, except where it was needed to be.
3 So it was all about the back office systems. So
4 we were putting in a standard SAP accounting
5 system, not a homemade built and a class system,
6 as it was called in the past. So we would put
7 in a standard SAP accounting system, which would
8 make reconciliation much simpler and, out of
9 that, somewhere in the requirements, came the
10 thing that was about the suspense account.

11 But that -- this was really to get things
12 quicker and more accurate, in --

13 Q. And to get rid of the 150 people?

14 A. Well, yes. I don't think we got rid of them all
15 because we would still have differences in the
16 client data to the feed from the counters. So
17 we wouldn't get rid of them all but it removed
18 a lot of the resource requirement, and that's
19 what you would expect for a business that's
20 making losses, to try to --

21 Q. Save money?

22 A. -- reduce its operating costs, yeah.

23 Q. So post-Horizon but pre-IMPACT, there was a team
24 of people at Chesterfield undertaking manual
25 reconciliation whose job it was to pick up

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1 wasn't -- remembering that, really, the
2 reduction in those teams was as much to do with
3 the client processes and what feeds of data we
4 got from them and whether they were automated as
5 well. But the SAP system would have done some
6 of that reconciliation but if it still produced
7 differences, then they still had to be
8 investigated.

9 But I can't remember what size the teams
10 went down to. I wouldn't say -- we certainly
11 didn't get rid of everybody because it was
12 product design, really, that allowed the full
13 automation.

14 Q. In your witness statement -- no need to turn it
15 up -- at paragraph 13, you say Peter Corbett and
16 David Smith sponsored the IMPACT Programme. Who
17 took the decision to remove the suspense account
18 facility?

19 A. Well, all of the requirements would have been
20 signed off by stakeholders and but, ultimately,
21 it would have been the programme sponsors who
22 I was reporting into to say this will deliver
23 benefits.

24 Q. Can we translate that into some language that I,
25 at least, understand. You said ultimately it

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1 would have been signed off by stakeholders?
 2 **A.** Yes.
 3 **Q.** What does that mean?
 4 **A.** Well, when you're doing a project you produce
 5 documents which describe what you're going to
 6 do, yes? And those documents will have a set of
 7 reviewers and a set of approvers. So any
 8 document that affected the branches, would have
 9 to go through the Network -- would have Network
 10 stakeholders as reviewers and signatories.
 11 So documents always -- when you set up
 12 a document and some of the ones you pulled up
 13 say, you would have to -- right up front, you
 14 would have a product description, you would
 15 create a product description for that document
 16 you were going to produce, product descriptions
 17 for other things as well, system design, you
 18 know, other things, but you would produce
 19 a document, you would agree with the
 20 stakeholders, because we had, you know,
 21 stakeholder meetings, who wanted to see and sign
 22 off that document.
 23 And you would have a whole -- and you would
 24 see it on the front of documents like you've
 25 shown before, that those reviewers would be set

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1 technical architecture -- oh no, they're the two
 2 people there, yes. So yes, that's right.
 3 So ultimately they were the signators, they
 4 weren't necessarily the reviewers. There would
 5 be separate reviewers in advance of that.
 6 **Q.** Who signed off this document?
 7 **A.** Myself and Clive Read.
 8 **Q.** So you -- if I asked the question "Who agreed
 9 that the things described in this document are
 10 accurate and that proposals in it should be
 11 implemented?" the answer would be "Me and
 12 Clive"?
 13 **A.** Ultimately, yes, there would be somewhere a set
 14 of reviewers, and Clive and I would only sign
 15 the documents off if those reviewers were
 16 satisfied with the document. If they raised
 17 issues, we would either resolve them or do
 18 something but there is a whole process before.
 19 This is just the signatory bit at the end. So
 20 ...
 21 **Q.** So if we look at page 7 of the document, where
 22 we see a list of reviewers in the top box, is
 23 that list of people people who have looked at
 24 the document before you have signed it off?
 25 They have not signed it off, you have?

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1 before the document was created.
 2 **Q.** So the presence of a name amongst somebody --
 3 a list of reviewers, you understand to mean
 4 signing off, ie approving?
 5 **A.** No. Reviewers were reviewers. They read the
 6 document and fed back comments. That was the
 7 initial stage, obviously, to get rid of any
 8 inaccuracies and errors and then, ultimately,
 9 there were signatories after that.
 10 So each document would have a set of
 11 reviewers and then the people who were
 12 responsible for actually signing it off and they
 13 would normally sign it off on the basis that the
 14 reviewers, who were the people who worked for
 15 them very often, were happy that the review
 16 they'd done was adequate and that there were no
 17 significant issues that hadn't been resolved.
 18 **Q.** So if we get back up on the screen, please,
 19 POL00038870. If we look at the front page on
 20 that, does that tell us who signed off,
 21 ie approved, the contents of the conceptual
 22 design for the accounting and cash management
 23 programme?
 24 **A.** Yeah, what I probably can't understand on that
 25 is we've obviously got business architecture and

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1 **A.** No, because they didn't have the authority to
 2 sign it off. So they would be the minimum
 3 people -- so at the beginning of the programme
 4 you create a product description, and that
 5 product description will tell you who are going
 6 to be the mandatory reviewers who are going to
 7 be the signatories, who are going to be the
 8 people that create it. And that would all go
 9 through -- those documents at the beginning that
 10 tell you who those people are would go through
 11 its own review process to make sure that
 12 everybody that should be involved in that, in
 13 the review, was involved in that.
 14 But Clive and I basically would ultimately,
 15 in most documents -- not always -- be the final
 16 signatories, because we -- and we would do that
 17 not on the basis that we understood all the
 18 detail in that, but the people that we had
 19 agreed upfront in the product description should
 20 be involved in the review had been involved.
 21 **Q.** Who took the decision, ie signed off the
 22 decision, to remove the suspense account
 23 facility?
 24 **A.** Well, if it's in this document --
 25 **Q.** No, no, it's not.

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1 **A.** No. Well, you'd have to look at the -- whatever
2 document that was in.
3 **Q.** I can't see one. That's why. It seems to be in
4 a collection of email chains.
5 **A.** No, I can't remember that far back because,
6 obviously, it was a small part of the programme.
7 I'm not saying it wasn't an important part but
8 if you asked me who, we clearly would have
9 involved Network in that, as a primary owner,
10 because they were the primary owner of that, but
11 on the back end, Finance were, if you like, the
12 people who were responsible for the outcome of
13 that design, because it was about what losses
14 they saw in the account.

15 So there would have been -- there should
16 have been something that said that. But I don't
17 know, you know, talking 20 years ago here,
18 it's --

19 **Q.** On a decision like that, we wish to remove the
20 suspense account --

21 **A.** Yes.

22 **Q.** -- because we believe that it is used by
23 subpostmasters to hide and cover up losses --

24 **A.** Yes.

25 **Q.** -- and it will have the benefit of saving the

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1 **A.** No, well at a high level, so the original
2 programme initiation document would have said
3 that that was one of the things we were going to
4 do. So the project initiation document would
5 have been signed off across the business by key
6 stakeholders. This was just the implementation
7 of something, so this is the conceptual design
8 that talks about that, but that's not the
9 initial "This is what the programme is going to
10 deliver".

11 **Q.** I'll try and ask it more simply. Was the
12 decision to remove the suspense account
13 a decision, to your knowledge, that was taken by
14 the board?

15 **A.** I think it was in the original business case,
16 because we would have had a figure for the
17 reduction of losses we felt was associated with
18 that.

19 **Q.** So the board would have had knowledge of it?

20 **A.** Absolutely.

21 **Q.** Can we look at some email threads, please.
22 Starting with FUJ00126036. Can we look, please,
23 at page 4. You'll see the last email in the
24 chain is from Clive Read. If we scroll up to
25 the bottom of page 2, you'll see that Mr Read

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1 Post Office millions of pounds a year, would the
2 board be involved -- Post Office Board be
3 involved in such a decision?

4 **A.** No, they would have remitted that. So,
5 actually, if you look at the bottom, "Business
6 Review", Stephen Hirst was in Finance, quite
7 high up in Finance. Ruth Holleran, who I'm sure
8 you're aware of on this programme, was --
9 I can't remember exactly her role at the time
10 but she was high up in sort of the IT. Vicky
11 Noble was in Transaction -- was the head of
12 Transaction Processing at the time. Ann
13 Cruttenden was the business change manager for
14 the Network. Ann Clarke was in my team.

15 I can't -- Bob Lammin. I'm sure POID,
16 either Bob Lammin or Neil Salter -- Jack
17 MacKenzie, I don't remember Jack MacKenzie, so
18 it's a cross-representation --

19 **Q.** Sorry, just to stop there. You think that
20 Mr Lammin or Mr Salter were from the
21 Investigations Division?

22 **A.** They could have been.

23 **Q.** Okay. My question was about the board and you
24 said that you don't think the board would have
25 been involved in decision making on this.

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1 send it to Ruth Holleran and Tony Marsh and it
2 was copied to you; can you see that?

3 **A.** Yes.

4 **Q.** What roles at this time, early 2004, did
5 Ms Holleran and Mr Marsh perform in relation to
6 you?

7 **A.** Well, they would be my stakeholders on the
8 project. So they may or may not have been on
9 the board. I can't remember now who was the
10 constituents on the board. But Tony Marsh,
11 I think, was to do with Investigations? But I'm
12 not ...

13 **Q.** If you can't remember it's best to say, "I can't
14 remember".

15 **A.** I can't remember.

16 **Q.** Okay. Let's look at the email. This is from
17 Mr Read who was the Chief Systems Architect at
18 Post Office. So if we go down rather than up.
19 Thank you.

20 He says:

21 "As you know we are currently in the middle
22 of requirements workshops on the final phase of
23 the IMPACT Programme. Although we have
24 a scheduled Stakeholder meeting early in
25 February, given tight timescales there are some

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1 emerging concerns which I think I need to flag
2 up."
3 Number 1 is "Suspense Account Threshold":
4 "The current assumed position is that
5 a single threshold of £250 will be applied by
6 Horizon below which variances cannot be placed
7 into Suspense Account ... This is a new system
8 control which does not currently exist."
9 Can you remember anything about that?
10 **A.** No, I can't. I mean, it was obviously some
11 forerunner to us removing the suspense account.
12 **Q.** He continued:
13 "There is a requirement (from Operations
14 [representatives]) to introduce a number of
15 different thresholds depending on the Office
16 type (eg Community offices to be at a much lower
17 level).
18 "Although this could be accommodated I have
19 concern it begins to add additional complexity
20 both to the system build and subsequent
21 operation ... is this [a must-have]?"
22 **A.** Mm-hm.
23 **Q.** Then under item 2 "Suspense Account
24 Authorisation":
25 "The current assumed position is that

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1 Can you see that?
2 **A.** Yeah.
3 **Q.** Top right, "Sue M Harding".
4 **A.** Yeah.
5 **Q.** In his second paragraph, Mr Marsh says:
6 "On the suspense account issue, I'm afraid
7 that I share the same beliefs as mine and other
8 Ops reps, if there is no independent control and
9 authorisation process for the use of suspense
10 accounts then postings will rapidly increase to
11 unacceptable levels. Irrespective of our
12 aspirations for a simplified process to support
13 commercially minded agents I believe that many
14 of those of a more historic mindset will exploit
15 the facility ..."
16 So that's again very similar to the views
17 that you expressed earlier?
18 **A.** Yes, as I say, this -- the decision to remove
19 suspense account wasn't mine and mine alone, you
20 know. This is business people saying, "We have
21 an issue here and we need it to be tackled".
22 **Q.** In the decision to remove the suspense account,
23 was there ever any discussion that "Horizon may
24 contain errors, bugs and defects that would
25 cause discrepancies when it comes to balancing,

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1 subject to threshold control above, the
2 requirement to seek telephone authorisation for
3 posting variances to Suspense would cease, on
4 the understanding that improved timeliness and
5 visibility of office liabilities ... would
6 provide sufficient control ...
7 "The Operations and Security view was that
8 removal of this control would declare 'open
9 season' on the use of Suspense postings, leading
10 to loss of financial control, spiralling
11 non-conformity, etc ..."
12 Does that tie in with what you were
13 suggesting as to the nefarious use of the
14 suspense account earlier.
15 **A.** Yes, "open season". That's exactly what that
16 means. Yes.
17 **Q.** He continues:
18 "I think this is an important position to
19 take in our approach, to underline our objective
20 to simplify and leverage new capability, but
21 recognise the challenge is therefore to define
22 a 'fit for purpose' control framework which
23 tackles these fears head-on."
24 Then if we go up the page, please, to the
25 reply. You're copied in to Mr Marsh's reply.

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1 we need to take that into account"?
2 **A.** Not that I'm aware of but you can see from this,
3 I was copied in on this, the decisions were
4 around the people who worked for me and the key
5 stakeholders. So I don't know whether any of
6 those people were aware of that. I certainly
7 wasn't aware of that.
8 **Q.** In the meetings that you attended, in the
9 documents that you exchanged, in any workshops
10 that you were present at, was it ever discussed
11 "Hold on, look, Horizon in its design, its
12 testing and its rollout, has been slightly
13 problematic in terms of balancing. We've had
14 hundreds and thousands of calls from
15 subpostmasters saying they can't balance and
16 they can't explain why they can't balance. We
17 need to take that into account in deciding to
18 remove the suspense account facility"?
19 **A.** No, I was never aware of that, I was never
20 aware -- I know right at the beginning I was
21 involved in an Acceptance Incident, right at the
22 beginning, about balancing and stuff, but I was
23 never aware that in the live system there were
24 bugs, et cetera.
25 **Q.** Was, instead, the focus on covering up, hiding

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1 and exploitation by subpostmasters and removing
2 the facility for them to do that?

3 **A.** Yes. I mean, there was absolutely no doubt that
4 previously and prior to Horizon even being
5 there, that subpostmasters -- remembering that,
6 you know, they were independent, they were
7 sometimes only audited once every three years,
8 that they did have losses and hid those losses.
9 And, you know, it was part of the principle of
10 not particularly IMPACT but it was one of our
11 things to try to keep those to the minimum. And
12 I can't remember -- the removal of the suspense
13 must have come up in the initial requirements
14 workshops and accepted by all of the
15 stakeholders.

16 **Q.** Mr Marsh continues:

17 "Given that the overall project should
18 simplify reconciliation and settlement
19 significantly and should therefore mean that
20 errors will be identified more rapidly and will
21 be even more clearly the fault and
22 responsibility of the agent, is there any reason
23 to have a suspense facility at all? This might
24 mean that in extreme cases the agent would need
25 to contact the Retail Line or NBSC and negotiate

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1 everything, if you like. But I do -- I do
2 remember that the decision was made, and it
3 involved lots of stakeholders in that decision.

4 **Q.** Was that decision informed by a view of the
5 contract "We can get rid of suspense entirely
6 because subpostmasters have to bear the
7 responsibility for any and all discrepancies
8 anyway"?

9 **A.** Yes, I think that's true, although I don't think
10 anybody would have necessarily meant that that
11 included bugs and errors in the system.

12 **Q.** Was there ever any consideration of what happens
13 if there are errors, bugs and defects that are
14 the fault of the system?

15 **A.** Well, if anybody should have done that, I think
16 that would have been Clive, who was the
17 technical architect, who would understand much
18 more about the technical architecture of the
19 system, et cetera. But one would expect, you
20 know, that the subpostmasters would be raising
21 calls with the helpdesk if they could see that
22 there were suspect transactions.

23 I don't know what happened with the bugs and
24 defects and what the result was in the accounts
25 that were produced in the branch. So -- but one

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1 a 'loan' (at some level of interest?) to cover
2 very high values of loss but in most cases the
3 agent should be sufficiently capitalised to
4 cover ordinary variations, particularly if the
5 opportunity were offered to make losses good via
6 credit card, thereby enabling them to tap into
7 56 days of interest free credit (a facility
8 faced by the NFSP despite my early misgivings.)"

9 Were you aware at this time that there had
10 apparently been a suggestion by the NFSP that if
11 large losses were shown, their members could
12 always make it up by credit cards, tapping in,
13 therefore, to 56 days of interest free credit?

14 **A.** I may have been aware of it because I don't --
15 obviously, my name has been copied in on some of
16 these things but you have to remember as
17 programme manager I was copied in a lot of
18 things and, you know, I trusted -- we had some
19 very competent people here. Clive was a very
20 competent technical architect. Tony, if
21 I remember, was head of security, was he?
22 Something like that. So my understanding of
23 things or my involvement in things was generally
24 at a high level. I wasn't -- I was copied in on
25 these things but I couldn't have dealt with

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1 would have thought that if somebody was having
2 a very significant loss, they would try and pin
3 it down to something and then take some action,
4 either through the Network Support Business Unit
5 on the helpdesk or through the hierarchy in the
6 Network.

7 **Q.** What would you say if the helpdesk said to them
8 "But it's your responsibility to make good any
9 and all losses: make good the loss"?

10 **A.** Well, I don't think -- I think that's different
11 to somebody saying "I think there's a problem
12 with the system". If there's a problem with the
13 system I would have expected somebody would deal
14 with that or, you know, look into it.

15 **Q.** What if a subpostmaster was calling and saying,
16 "When I'm balancing, it's showing, week on week,
17 increased cash that I simply do not hold"?

18 **A.** I would have expected the Network Business
19 Support Unit to do something about that.

20 **Q.** And not say "Under the contract you're liable
21 for all and any losses, make good the loss or
22 stop trading"?

23 **A.** No, you know, if branches were raising concerns
24 that something was happening that they couldn't
25 understand, then if this was across a number of

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1 people, even if it was one office that kept
 2 saying, you know, it happens every week, I would
 3 have expected there would have been some --
 4 that's what the Network Business Support Unit
 5 were there for.

6 **Q.** The Inquiry has hearing a good deal of evidence
 7 that there were numerous occasions when Horizon
 8 would create imbalances, that the system would
 9 fail to identify how that imbalance had been
 10 created and, even after investigation, a root
 11 cause of the creation of the imbalance could not
 12 be found.

13 **A.** Mm-hm.

14 **Q.** Was it your view that the system was working
 15 robustly and well and, therefore, there was no
 16 need to make provision in the IMPACT Programme
 17 for such events or was it your view that,
 18 regardless of any bugs, errors or defects, the
 19 responsibility for any losses was that of the
 20 subpostmasters anyway?

21 **A.** I would absolutely never have said that
 22 subpostmasters had to make good losses that were
 23 caused by the Fujitsu -- the Horizon System.
 24 No. That's not my way of working at all, and
 25 I wasn't aware of any of that, so ...

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1 the paragraph at the bottom of the page, under
 2 the heading "Suspense Account Manual
 3 Authorisation process and universal parameter".
 4 It says:

5 "The decision was reached yesterday by key
 6 senior stakeholders to remove the Suspense
 7 Account altogether. This would force Branches
 8 to make good all losses immediately. This needs
 9 to be considered in terms of how Branches can
 10 adjust figures, hardship cases, how Branch
 11 accounts will be corrected with errors ..."

12 **A.** Mm-hm.

13 **Q.** Can you recall, would you have been one of the
 14 people described as "key senior stakeholders"
 15 who took a decision to remove the suspense
 16 account?

17 **A.** I honestly can't remember. If I was in
 18 a meeting with those senior stakeholders, it
 19 would not have been my decision. I was
 20 a programme manager of a project that the
 21 requirements came from the business, and so that
 22 would have been -- I could have been at
 23 a meeting. I can't remember. As I say,
 24 a wouldn't see myself -- you might prove me
 25 wrong in a minute by another document, I don't

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1 **Q.** Were you present at any meetings at which the
 2 NFSP offered a view similar to or the same as
 3 set out in this email here?

4 **A.** A meeting with the NFSP, did you mean?

5 **Q.** Sorry?

6 **A.** Did you mean was I at a meeting with the NFSP?

7 **Q.** Yes.

8 **A.** No, I don't recall that.

9 **Q.** Did you attend meetings with the NFSP or was
 10 that below your level?

11 **A.** Um ... I'm sure I did, because -- oh no, I'm
 12 trying to think. No, it was probably -- I would
 13 have had somebody in my team who had the
 14 relationship with the NFSP. I would only have
 15 gone to a meeting if that member of my team had
 16 said they thought I needed to attend.

17 **Q.** Can we look, please, at FUJ00126038. Thank you.
 18 This is an invitation to a meeting by email
 19 dated 12 February 2004. The meeting was about
 20 branch trading, the treatment of the suspense
 21 account to be held on the 18 February. You'll
 22 see that you're not amongst the list of those
 23 who were invited to it.

24 **A.** Mm-hm.

25 **Q.** But I just want to ask you about some text in

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1 know. But I would not have seen myself as
 2 making that decision. I was a programme
 3 manager, I wasn't a business -- I wasn't
 4 somebody in the business.

5 **Q.** So who, if you can help us, would be key senior
 6 stakeholders who took a decision on 11 February
 7 to remove the suspense account altogether?

8 **A.** Well, at the end of the day, they may have
 9 been -- it may have been the programme board,
 10 which would have been people like -- so my
 11 programme was sponsored by the Finance Director,
 12 Peter Corbett, and then there would be somebody,
 13 absolutely, from Network, and that might have
 14 included POID. So there would be those type of
 15 people who were -- who would be making that sort
 16 of decision. I say, I may have facilitated the
 17 decision being made but it would not have been
 18 my responsibility to be one of the people who
 19 voted on the decision, if you like. I was just
 20 there to implement things if the business
 21 decided that's what they wanted to do. But
 22 I don't remember the meeting.

23 **Q.** I wouldn't expect you to remember the meeting;
 24 I'm just trying to -- we haven't got a record of
 25 it or any other documents, I think, that refer

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1 to it.

2 **A.** No, no. But that's who would imagine. It would
3 be somebody -- it would certainly have been
4 Peter Corbett, I would have thought, and then it
5 would include people from Network, which would
6 include people like Security and people like
7 that.

8 **Q.** Would you agree with the view expressed there
9 that this, ie the removal of the suspense
10 account altogether, would force branches to make
11 good all losses immediately? That was the aim
12 after all, wasn't it?

13 **A.** Yes, after all, at the end of the day, that's
14 what contractually I think they were required to
15 do. I think that would have been -- not on the
16 basis of that -- those losses including errors
17 and bugs in the system. I can't imagine any of
18 the key stakeholders saying that that was -- but
19 I wasn't there, I don't think.

20 **Q.** Was that ever considered by anyone? You made
21 an exception today, "Ah, but not if it was
22 caused by an error, bug or defect by Horizon",
23 but in the documents we've got we see no
24 expression to that. In your witness statement
25 you refer to an obligation to make good any and

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1 testing stage of Horizon.

2 **A.** Ah, right, okay.

3 **Q.** Did you hold that view?

4 **A.** Yes, I do remember, as I say, that I was
5 involved in an Acceptance Incident of the
6 original design and I remember going to Feltham,
7 and I think Tony Oppenheim was the -- was he the
8 main guy? And Tony had to -- I think -- and, oh
9 gosh, you know, it is going back a large number
10 of years -- that they did some changes or
11 created -- I can't remember but they did, on the
12 face of it, in the meeting that we had, resolved
13 what was -- what was the Acceptance Incident.

14 So -- and certainly would not have signed
15 off that Acceptance Incident if I thought there
16 were any. But this was acceptance -- I can't
17 remember whether we did acceptance before it
18 went in any offices or after there'd been
19 a trial. I mean, my recollection --

20 **Q.** It was the latter.

21 **A.** Was it, after the trial? So I was certainly not
22 aware that there was anything that would affect
23 the accuracy of the accounts. Otherwise
24 I wouldn't have signed off that Acceptance
25 Incident.

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1 all losses and you said a number of times today
2 yes, ultimately it was the contract to make good
3 any and all losses.

4 **A.** Yes, and I had no visibility, you know. As
5 I say, I've taken an oath, I had no visibility
6 that there were problems with the system.
7 I don't know whether people in POL knew there
8 were problems with the system. I'm not saying
9 they did or they didn't, but I wasn't aware of
10 that. And, certainly, you know, it would not
11 have been -- I would not, hand on my heart, have
12 ever expected a branch to make good a loss that
13 was system created.

14 **Q.** Can we look at paragraph 38 of your witness
15 statement, please, which is on page 8.
16 You say in 38:
17 "The 'robustness' of Horizon was not
18 considered to be an issue and there was no
19 evidence to suggest there were any 'bugs'
20 affecting the efficacy of the system."
21 Did you hold that view when you were
22 involved as an expert customer?

23 **A.** Sorry, what do you mean by "expert customer"?

24 **Q.** It's a phrase you use in your witness statement
25 when you were brought in to the design and

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1 **Q.** It was therefore -- this, what we see in
2 paragraph 38 -- your view at the time that
3 Horizon was rolled out?

4 **A.** Yes.

5 **Q.** It was your --

6 **A.** Well, and that I'd not heard anything since.

7 **Q.** Sorry?

8 **A.** And that I was not aware of anything since then.

9 **Q.** When did you become aware that Horizon was
10 bedevilled with bugs, errors and defects?

11 **A.** Well, I didn't know, I'm saying I didn't know --
12 well, until I'd got involved in this, actually.

13 **Q.** So even up until 2017 when you left, you still
14 thought Horizon was working perfectly well?

15 **A.** Yes, I had not been advised of anything.
16 Obviously, I'd moved into different roles by
17 then anyway so I wouldn't have been involved in
18 that sort of thing. I mean, I was working on
19 totally different projects and nothing to do
20 with branches.

21 **Q.** It follows that you held this view throughout
22 your involvement with the IMPACT Programme?

23 **A.** Yes.

24 **Q.** Were you actively told that there were no
25 errors, bugs or defects in Horizon or no issues

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1 with its robustness?
 2 **A.** No, but I would have expected, given that the
 3 people who were on my board -- because remember,
 4 you know, I was a programme manager and I had
 5 a programme board of people high up that
 6 somebody would have said, "Well, Sue, if you do
 7 this, you know, what's the effect of these bugs,
 8 etc?" so I don't recall that I was ever advised
 9 that there were any bugs.

10 **MR BEER:** Yes, thank you. They are all the
 11 questions I am going to ask you. I suspect
 12 there are other questions from others.

13 **SIR WYN WILLIAMS:** Mr Stein?

14 **Questioned by MR STEIN**

15 **MR STEIN:** Ms Harding, I represent a large number of
 16 subpostmasters and mistresses. One of those,
 17 his name is Mark Kelly. You've used an example
 18 today in your evidence which is that you
 19 wouldn't have expected that someone who had
 20 suffered a robbery at their Post Office would be
 21 then asked to pay up for those losses. Do you
 22 remember saying that in your evidence today?

23 **A.** Yes.

24 **Q.** Mark Kelly was robbed, and the robber took
 25 £47,000, was prosecuted as a result, and was

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1 Programme was being discussed, it seems.

2 **A.** Possibly, yes.

3 **Q.** I see. Now your statement, which you've been
 4 asked a number of questions about by Mr Beer
 5 here, who has gone through different aspects of
 6 your statement, you make various references
 7 that -- I'll only quote one, paragraph 32:

8 "In contractual terms, they were liable
 9 [that's subpostmasters] contractually for any
 10 shortfalls which had to be made good."

11 You make a number of references throughout
 12 your statement in relation to that same topic,
 13 this contractual liability. You repeat it,
 14 I think, four times.

15 Help us understand a little bit more about
 16 how your statement was created. Did you have
 17 the support of lawyers, solicitors, in relation
 18 to that?

19 **A.** No.

20 **Q.** No. So it's a statement you wrote yourself; is
 21 that correct?

22 **A.** Yes.

23 **Q.** Right. Did you -- so we can just understand
 24 exactly what happened, was this a statement that
 25 you checked with your previous employers, the

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1 given seven years for conducting that robbery.
 2 Mr Kelly was pursued by the Post Office for the
 3 £47,000. Are you aware of that?

4 **A.** Absolutely not.

5 **Q.** He gave evidence about that and what happened to
 6 him, on 1 March 2022 last year. Did you by any
 7 chance see his evidence?

8 **A.** No.

9 **Q.** Did you watch the evidence of any of those
 10 people, the subpostmasters and mistresses that
 11 gave evidence during that time?

12 **A.** No.

13 **Q.** The date of his robbery was 14 November 2004.

14 Now 2004, help us please understand the
 15 significance of that date: was that either just
 16 at the beginning or just after the start of the
 17 IMPACT Programme being born, essentially being
 18 discussed?

19 **A.** Yeah, in -- I can't remember whether it was, but
 20 it was around that time when IMPACT was either
 21 in -- it was certainly in progress or --

22 **Q.** So his robbery in November 2004 was just at the
 23 starting point of discussions about the IMPACT
 24 Programme and him being pursued, then, for the
 25 £47,000 by the Post Office was whilst the IMPACT

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1 Post Office, at any stage?

2 **A.** No.

3 **Q.** No. I'm grateful. Forgive me for asking those
 4 questions in that way.

5 **A.** No, I'm --

6 **Q.** That's the way your statement reads. It reads
 7 as a statement that's made by someone that has
 8 done it themselves rather than going to someone
 9 like me, a lawyer; do you understand that?

10 **A.** Yes.

11 **Q.** Right. Now your statement, in terms of the way
 12 it refers to the use of the contractual terms
 13 that SPMs, subpostmasters, were liable for any
 14 shortfalls, at paragraph 31 of the statement it
 15 says this:

16 "It was agreed during the design of IMPACT
 17 that the suspense account would be removed as
 18 historically it was used by subpostmasters to
 19 hide discrepancies in their accounts rather than
 20 resolve them."

21 Now, you then have the repeated references
 22 to the contractual liability. Mr Beer has asked
 23 you a good number of questions about the IMPACT
 24 Programme itself and gone through some of the
 25 documentation.

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1 Just help us understand a little bit more.
 2 This attitude, which is the contractual
 3 liability attitude towards subpostmasters liable
 4 for any shortfalls which had to be made good, we
 5 don't actually see it phrased that way in the
 6 IMPACT documents and points that have been
 7 raised and have been discussed with you. It
 8 doesn't appear that way to be referred to.
 9 **A.** Well, I mean, I was actually on holiday when
 10 I was writing my statement, so I wouldn't
 11 necessarily have looked at all the
 12 documentation. So it's just my words and my
 13 recollection.
 14 **Q.** Right. But you've had number of questions being
 15 asked of you today about the IMPACT
 16 documentation. The IMPACT programme itself took
 17 in terms of development time about three years,
 18 yes?
 19 **A.** Yes, it was a very significant programme.
 20 **Q.** Significant programme. It took a lot of
 21 discussions.
 22 **A.** It did but you have to remember the IMPACT
 23 Programme was mainly about replacement of the
 24 back offices, back office systems.
 25 **Q.** Yes.

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1 programme manager so I had a programme support
 2 team that would have dealt with all those
 3 documents.
 4 **Q.** The programme support team that dealt with
 5 documents in the repository, can you give us
 6 an idea of, if you like, who was in charge of
 7 that? Who had control of that documentation?
 8 **A.** I can't remember that.
 9 **Q.** The repository, any better idea about a way to
 10 identify that?
 11 **A.** No.
 12 **Q.** Was it called anything? Would you say something
 13 to a particular repository within the system?
 14 **A.** No, I would rely on my team, if I wanted
 15 a document, to get that document for me.
 16 **Q.** Right. Your team -- the person that you would
 17 go to within your team would generally be who?
 18 **A.** The -- my programme support team.
 19 **Q.** Name, please, if you have it? Who in the
 20 programme support team would you routinely go to
 21 to say --
 22 **A.** I can't honestly --
 23 **Q.** -- "Would you mind terribly, can you find me the
 24 meeting minutes of a year and a half ago"?
 25 **A.** I can't remember, sorry.

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1 **A.** It wasn't -- there was not a massive focus on
 2 the branch, because the -- that data was already
 3 coming in to the incumbent systems that were
 4 there.
 5 **Q.** All right but, nevertheless, three years of
 6 development of the programme and then you get
 7 the signing off of it. There must have been
 8 a lot of meetings involved in the development of
 9 the programme; is that correct?
 10 **A.** Yes.
 11 **Q.** Were they minuted, these meetings?
 12 **A.** I'm absolutely certain they were, yes.
 13 **Q.** Yes. Then there must have been a number of
 14 different iterations, number of different early
 15 copies of the final documents that were then
 16 signed off; yes?
 17 **A.** Yes, so ultimately there it was a business case
 18 that went right up to the group board, because
 19 of the level of cost associated.
 20 **Q.** Now, all of these discussions, and the ones that
 21 were minuted, were they kept by you in
 22 a particular file on a laptop or a desktop that
 23 you had?
 24 **A.** We would have had a depository of those
 25 documents but I wasn't, you know, I was

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1 **Q.** Who was in your team?
 2 **A.** So I had Torstein was my technical design --
 3 **Q.** Torstein?
 4 **A.** Torstein Godeseth, who later moved to Fujitsu.
 5 Torstein was involved with me. I had Ann
 6 Clarke, who was -- used to work in Transaction
 7 Processing, so -- which was really -- because
 8 the whole of IMPACT primarily, the main of
 9 IMPACT was to replace the back office systems.
 10 You know, the changes that were made to the
 11 Horizon System were only to facilitate that.
 12 So we were putting a SAP system in to the
 13 back office. So that was primarily were
 14 there -- Ann Cruttenden represented the Network.
 15 **Q.** But in terms of people that can help us identify
 16 the documents, these meetings that you claim
 17 were minuted, that might be Ann Clarke and
 18 Mr Godeseth?
 19 **A.** They might be able to, yes, but neither of them
 20 are at the Post Office anymore so if they
 21 were -- if they were somewhere, you know, that
 22 neither of them -- or -- are there any --
 23 **Q.** But we should be able to find, should we, within
 24 the Post Office, a repository of documentation
 25 that deals with the development over the three

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1 years of the IMPACT Programme, basically, you
2 would expect?

3 **A.** I think you might do but I don't know where that
4 would be.

5 **Q.** Right. Now, help us a little bit more. I've
6 asked a number of questions about the
7 contractual liability side of things and then
8 you've been asked by Mr Beer questions about the
9 ability which was to use the suspense account
10 used by subpostmasters to hide discrepancies.

11 I've asked you about the shortfall side of
12 things not being in the IMPACT documentation.
13 Have you seen in the IMPACT documentation that
14 you've gone through a reference to
15 subpostmasters hiding discrepancies in those
16 accounts in that documentation?

17 **A.** No, I guess it's my -- the wording is my
18 recollection of what I was asked to do in the
19 programme. Remembering that, you know, I was
20 the programme manager. I wasn't the owner of
21 the requirements, although some of it -- because
22 I'd been business architect, the origins of the
23 programme came out of me being the business
24 architect because I was trying to design more
25 effective system relationships. So the main

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1 That's what you understood?

2 **A.** Yeah, well, yes. Yes. While we were --
3 I wouldn't say they were two big drivers.
4 I would say they were things that were put into
5 the programme. Because we had to make changes
6 to the Horizon System in order to feed the new
7 back office systems we were putting in, we would
8 have had workshops and, at those workshops,
9 there would have been the idea that we should
10 clamp down, as I would say, on the suspense
11 account.

12 **Q.** Right and these things -- I'm using your
13 words -- these things that were put into the
14 programme, who explained that these things
15 needed to be put into the programme? Who was it
16 that gave you those instructions?

17 **A.** It would be the key stakeholders.

18 **Q.** Right. In particular, who? You mentioned
19 Ms Cruttenden.

20 **A.** Well, as I say, I would have suspected that
21 there was -- there were three areas -- well,
22 Network, which I would include, you know, the
23 Network line, but also -- and I can't remember
24 whether POID were part of that Network line at
25 the time or whether they were in a separate

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1 focus of IMPACT was about putting a SAP system
2 in the back office.

3 **Q.** Yes, so the points that I've raised, which are
4 the -- the potential for subpostmasters to use
5 a suspense account to hide discrepancies,
6 paragraph 31, one of the examples, paragraph 32
7 the contractual liability for shortfalls which
8 had to be made good, those are in your
9 statement; these are all things that you
10 understood had to be dealt with by the IMPACT
11 Programme.

12 **A.** They would have been requirements that were
13 provided to me by the programme board or people
14 representing members on the programme board. So
15 I say Ann Cruttenden represented the Network.
16 We would have had people representing POID who
17 would be the main people who would have come up
18 with that as a requirement.

19 **Q.** So twinning these two things together, basically
20 you understood that the IMPACT Programme was at
21 least partly going to be designed to stamp out
22 the use of subpostmasters hiding discrepancies
23 and that they were nevertheless liable to make
24 good any shortfalls. These were two big drivers
25 for that part of the programme; is that correct?

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1 area -- and then it would have been from Finance
2 because, clearly, Finance -- and Peter Corbett
3 was the sponsor who was in Finance, who was
4 having to include those losses and, as we've
5 seen in the documents, we were talking earlier
6 about the scale of the losses that were in the
7 accounts, and that was a big driver for the
8 business at the time to reduce those.

9 So we would have -- but because Peter was my
10 sponsor, in the initial requirements workshop
11 those sort of things would have -- I imagine it
12 would have come from key stakeholders. I can't
13 remember the exact --

14 **Q.** Right, and the way you described this earlier,
15 you described Peter Corbett as being a Finance
16 Director and you also referred to the fact that
17 you were told to do certain things. The way
18 I've recorded it was that you were told go "do
19 that" and the "do that" includes these
20 particular points, which relate to
21 subpostmasters, "Get rid of these subpostmasters
22 hiding discrepancies in the suspense account and
23 make sure that they're liable for all
24 shortfalls"?

25 **A.** Yeah, and some of it, because, as I say, because

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1 I'd been business process architect and a number
 2 of other things, they would be things that
 3 I would have -- so I don't know where the
 4 original idea came from. It could have come
 5 from me, the idea, and then the Finance Director
 6 said, "Yes, that's a good idea", or it could
 7 have come from the Finance Director. I can't
 8 remember the order of how it came about.

9 **Q.** Now, just I've only got one point before I move
 10 on. I won't take long on this. This question,
 11 this idea of subpostmasters hiding discrepancies
 12 in their accounts. Again, across the IMPACT
 13 documentation we've seen, there is no evidence
 14 that is set out saying that "We've got 30
 15 postmasters and mistresses, these are the names,
 16 these are the dates, these are what happened,
 17 doing all of this?" There's no reference to
 18 a whole bunch of evidence of subpostmasters
 19 doing this. Was there a document that you were
 20 given that's part of your "go do that" programme
 21 that set out evidence that demonstrated that
 22 subpostmasters were doing this very thing?

23 **A.** No, but I'm assuming because there was values of
 24 losses within there that those losses figures
 25 were given to me by people, and there would have
 101

1 evidence that lurks behind this idea that
 2 subpostmasters were going around hiding? Right.

3 **A.** I can't recall seeing a document but I'm sure
 4 that I was provided with information from people
 5 who I would have trusted to provide me with the
 6 correct information.

7 **Q.** So are you assuming, is this your evidence now
 8 before this Inquiry, that your programme
 9 directors, the people that told you to "go do
 10 that" had such evidence?

11 **A.** I would assume that. Yes. They were all decent
 12 people.

13 **Q.** Okay, so that's your programming in terms of the
 14 "get this done". I'll just briefly move on.
 15 You've spoken about your knowledge of the system
 16 and you've spoken about the system you believed
 17 that was capable of rectification of any
 18 problems within the system. Let's just take
 19 that one step further. You've spoken about the
 20 helpdesk, and you knew that the helpdesk was
 21 there as a line of support for subpostmasters;
 22 is that correct?

23 **A.** Yes.

24 **Q.** Were you aware that there were four lines of
 25 support theoretically available to
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1 been -- because POID were involved, they would
 2 have had cases, numbers of cases, and done. So
 3 there would have been all that sort of thing.
 4 And remembering that, ultimately, the
 5 requirement is signed off by the programme
 6 board, they might have been created by me and my
 7 team but they were owned by the programme board
 8 and those areas were all represented on the
 9 programme board.

10 **Q.** Right, okay. So this seems to be the situation.
 11 You did not see any actual evidence that
 12 demonstrated that subpostmasters were carrying
 13 out this very programme of hiding discrepancies
 14 in the suspense accounts? There was no document
 15 that said, "We've got 60, 50 of these people
 16 doing this"? Is that correct; is that correct?

17 **A.** I can't recall that. But I'm sure that people
 18 gave me those -- well, it wasn't my decision to
 19 do it anyway. As I say, I was programme
 20 manager, so I was doing what the board, my
 21 program board, wanted me to do --

22 **Q.** Right.

23 **A.** -- which was documented in those requirements.

24 **Q.** So this is a two-step thing. First of all, you
 25 did not see such a document setting out the
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1 subpostmasters? First of all, the helpdesk,
 2 then beneath that, three other lines of support
 3 as and when the technical problem got more and
 4 more difficult? Were you aware of that?

5 **A.** Well, I'm assuming the helpdesk would reach out
 6 to other people and experts. The helpdesk
 7 themselves were not experts in the system or
 8 anything like that. So the helpdesk would reach
 9 out to whatever they --

10 **Q.** Can we avoid assumptions for the moment. In the
 11 time whereby you're starting off the IMPACT
 12 Programme, let's find out what you knew at that
 13 stage. So you've got a first line support which
 14 the helpdesk answering the telephone call, yes?

15 **A.** Mm-hm.

16 **Q.** You're aware of that. Were you aware at that
 17 time, during this early stage of the development
 18 of the IMPACT Programme, aware that there were
 19 three other lines of technical support for
 20 subpostmasters?

21 **A.** I can't remember if there had been three other
 22 lines. I think there was a Horizon -- was there
 23 a Horizon Helpdesk in Fujitsu? I'm not sure.
 24 No. So I'm not -- I can't recall but I would
 25 have been aware at the time, I'm sure.
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1 Q. You've been asked a good number of questions by
 2 Mr Beer about your knowledge of bugs,
 3 difficulties with the system, software problems.
 4 So what I'm trying to establish with you is what
 5 you knew about any system that was there to deal
 6 with such problems. So you knew about
 7 a helpdesk, in other words people taking
 8 telephone calls?
 9 A. Yes.
 10 Q. Right. You weren't aware about three other
 11 lines of support to deal with more and more
 12 difficult problems?
 13 A. Well, if you could describe what they were --
 14 Q. Yes, certainly I will.
 15 A. -- I might say whether I can remember them or
 16 not.
 17 Q. By any chance you might have spoken to Gareth
 18 Jenkins about this?
 19 A. I know Mr Jenkins very well.
 20 Q. Yes, we see a reference to him on the
 21 documentation. During the period of time
 22 whereby the helpdesk was in operation, there
 23 were about 20 to 100 software designers and
 24 developers working in fourth line support at any
 25 one time. All of them were allocated bugs,

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1 bugs, errors and defects, depending on their own
 2 type of qualification, all going on at one time,
 3 do you think that might have made you think
 4 "Well, hang on perhaps we ought to just give
 5 couple of thoughts to whether this system is
 6 really robust or not"?
 7 A. I wasn't aware of that, so I can't say what
 8 I would have done --
 9 Q. If you had been told.
 10 A. I don't know how I would have reacted if I'd
 11 been told because I need to understand more than
 12 what you're telling me, you know. I mean, all
 13 systems have support teams behind them. So
 14 I don't know. I can't answer that and I was
 15 a business -- you know, I was a business owner
 16 of the programme. I wasn't responsible for the
 17 support desks and et cetera.
 18 Q. It's possible it might have put you on notice
 19 that you may need to ask a few more questions
 20 about the nature of these bugs, defects,
 21 software problems; do you agree?
 22 A. Yes, if I'd been made aware of them I would
 23 probably be -- particularly if they were ones
 24 relating to accounting because that was really
 25 what -- IMPACT was improved accounting, you

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1 errors and defects, depending on their
 2 experience and technical knowledge of the
 3 component parts of the Horizon System
 4 architecture. Did you know that?
 5 A. Yes, so I knew there was a Horizon Helpdesk.
 6 I didn't know the constitution of it.
 7 Q. Did you know, I repeat, that there were about 20
 8 to 100 software designers and developers working
 9 in the fourth line support at any one time, all
 10 of them were allocated bugs, errors and defects,
 11 depending on their own experience with and
 12 technical knowledge of the component parts of
 13 the Horizon System?
 14 A. No, I didn't know what the Fujitsu helpdesk
 15 looked like or how it was structured.
 16 Q. Now I've read that from the statement of
 17 Mr Gareth Jenkins.
 18 A. Yes, because Gareth was in Fujitsu.
 19 Q. Now if at the time of your development of the
 20 IMPACT Programme you'd have been told that we've
 21 got four lines of technical support for
 22 subpostmasters, including one of them, which is
 23 the really when it's got sort of difficult line,
 24 fourth line support, dealing with 20 to 100
 25 software designers and developers, looking at

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1 know, so if I thought that there were bugs,
 2 et cetera, around accounting, I may have made
 3 different decisions. But I wasn't aware of
 4 that.
 5 Q. Lastly, just on this, Mr Jenkins didn't tell you
 6 about that, he didn't tell you "We've got this
 7 whole entire system, including a fourth line
 8 support system, with loads of people working on
 9 it, dealing with bugs and defects"; he didn't
 10 tell you that?
 11 A. No, because my -- I would have -- so Torstein,
 12 who now works with Fujitsu, was my technical
 13 architect so he would be, if anybody, the person
 14 talking to Gareth. But I can't say whether --
 15 I'm sure if Torstein had been aware of it then
 16 he would have told me. But I can't say. Maybe
 17 he wouldn't.
 18 **MR STEIN:** Thank you, Ms Harding.
 19 **Questioned by MS PAGE**
 20 **MS PAGE:** Thank you, I have some questions for you
 21 as well. My name is Flora Page and I act for
 22 some of the subpostmasters. In your witness
 23 statement, you've told us that the processes for
 24 raising a dispute regarding a discrepancy were
 25 not changed by the programme, the IMPACT

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1 programme and branches were supported by the
2 helpdesk and/or the Network team, and they would
3 raise any concerns through those channels. Yes?

4 **A.** That was my understanding, yes.

5 **Q.** I think I understood from your answers just
6 a moment ago that you haven't watched any of the
7 testimony from the subpostmasters in Phase 1, is
8 that right, or read it?

9 **A.** No, I haven't.

10 **Q.** What I'd like to do is take you through some
11 testimony that talks about how the support that
12 you were relying on actually operated. So I'm
13 going to ask, please, for INQ00001035 to be
14 brought up, please. This is the testimony of
15 subpostmistress Ms Janet Skinner. We'll just
16 read through some of that evidence when it comes
17 up.

18 Can we go, please, to page 24. We'll start
19 on what's actually the sort of page 94 of the
20 testimony, so we can sort of zoom in, please, on
21 the top half of the page. I'll just read it out
22 if that's all right, so that it's clear for
23 everyone:

24 "When you experienced an apparent
25 discrepancy or shortfall shown by Horizon, what
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1 Court of Appeal (Criminal Division), you
2 contacted the helpline 116 times between 1
3 January 2004 and 31 January 2005; is that right?

4 **"Answer:** Yes.

5 **"Question:** What advice did you receive?

6 **"Answer:** Basically the same: if the office
7 was short, it was my responsibility to make
8 good, that I was wrong.

9 **"Answer:** You've explained in your statement
10 that matters came to a head in 2006?

11 **"Question:** Yes.

12 **"Answer:** What happened?

13 **"Question:** The loss -- my office was
14 running at a loss of £40,000. I had a visit
15 from two retail network managers. There's only
16 one of them I can remember her name and it's
17 Diane Oyles, and when they came I took them in
18 the back, explained to them that my offices was
19 running at a loss. They asked if they could do
20 a cash check while they was there and they said,
21 'Well, what we'll do is we'll keep the office
22 open, we'll just do a cash check'.

23 "So I said, 'Well, to be honest, I'd rather
24 close it, have an audit and sort it out', and so
25 they did the cash check, we closed the office,
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1 did you do?"

2 So that's a question to Ms Skinner and she
3 responds:

4 "Well, you'd have to go through everything
5 that you had on hand, like giro things and
6 making sure your rems had been done correctly,
7 but the only thing you really had was what you
8 had in front of you, and I think what the
9 Horizon system installation did was it took away
10 all of the paperwork that you had that you could
11 cheque. So the only thing -- information you
12 actually had available was what the Horizon
13 system gave you.

14 **"Question:** To whom did you look for
15 assistance?

16 **"Answer:** The helpline. I rung the helpline
17 on numerous occasions. To be honest, when you
18 rang them, it was like they were reading from
19 a script. You could tell what they was reading.
20 It was something -- it was a script written
21 because of the way it was said to you over the
22 phone, and if they couldn't help you, they would
23 just say, 'Well, you just have to make it good
24 yourself'.

25 **"Question:** According to the judgment of the
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1 they removed the keys from me and told me I had
2 to meet them there the next morning at 9.00 with
3 the auditors.

4 **"Question:** How did you feel when you were
5 told to leave your branch?

6 **"Answer:** Devastated, absolutely devastated,
7 but I think I was more relieved, as well,
8 because I thought now, obviously, they're going
9 to get to the bottom of what's gone wrong.
10 I think you, sort of, you put your trust in them
11 because, as they keep portraying themselves, the
12 Post Office are a trusted brand and their trust
13 wasn't to find a problem that, it was to find
14 a solution, and I was the solution.

15 **"Question:** You have described employees of
16 the Post Office coming to your branch to carry
17 out an audit. What did they tell you about the
18 outcome of that audit?

19 **"Answer:** They just said that it was
20 actually running at a loss of 59,000 and I was
21 suspended without pay. I was searched before
22 I left and I was also informed that if I removed
23 anything from the office, it would be classed as
24 theft. So all paperwork, nothing, I couldn't
25 move anything. It all became the property of
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1 the Post Office.

2 **"Question:** How did you feel when you
3 returned home later that day?

4 **"Answer:** I was devastated, absolutely.
5 Everything just crushed. You just feel
6 crushed."

7 I'll pick it up, if I may, by going to
8 page 26 on our system, and picking up on
9 page 101 of the page numbers that come up on the
10 screen:

11 "Were you aware when you attended court on
12 2 February that you might be sent to prison?"

13 **"Answer:** No, I really didn't think I had,
14 because to go to jail, you've got to have
15 committed a crime and, if you can't prove that
16 you've committed a crime, because I couldn't,
17 I hadn't and they couldn't prove I had, but yet
18 I still went to jail.

19 **"Question:** Where in court were you standing
20 when the judge read out your sentence?

21 **"Answer:** In the dock.

22 **"Question:** What did the security guards do
23 when the judge sentenced you to prison?

24 **"Answer:** You're stood in the dock, and he
25 said that he was giving me a nine-month prison

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1 anything in with you.

2 **"Question:** Did you have an opportunity to
3 speak to your children when you arrived into
4 prison?

5 **"Answer:** I was given a phonecall there in
6 the evening and my daughter wouldn't actually
7 speak to me because she was just -- she was an
8 emotional wreck and I didn't want to speak to
9 her, to be honest. I felt so ashamed. I was
10 supposed to be there to protect them and show
11 them what -- you do the right thing but yet you
12 do the right thing and I went to jail anyway.

13 **"Question:** Were your children able to visit
14 you in prison?

15 **"Answer:** I didn't want them visiting me.
16 That was the only thing I could control and it
17 was hard enough for me to have that memory of me
18 being in jail, they weren't having that memory
19 of me being in jail. So I refused to see them."

20 So what I've just read out there is the
21 testimony that explains both the so-called
22 support that was offered by the helpdesk and the
23 Network team and the devastating consequences of
24 that so-called support or lack of on the
25 subpostmasters.

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1 sentence because of the amount of money that was
2 involved, because I'd stolen from the Crown, and
3 I heard the gate lock and then he told me that
4 it was a custodial sentence. I'll be honest, I
5 though he was going to say 'suspended' but he
6 didn't.

7 **"Question:** How did you feel when you were
8 escorted out of the courtroom?

9 **"Answer:** I was just an emotional wreck, I
10 don't actually remember. The only thing I
11 remember is being in the holding cell and then
12 going to Wakefield Prison.

13 **"Question:** How were you transported there?"

14 We'll just go over the page for a few more
15 lines:

16 **"Answer:** In -- well, they took me out in
17 handcuffs, put me in one of those police
18 transport things.

19 **"Question:** What happened upon your arrival
20 at prison?

21 **"Answer:** I was photographed, fingerprinted,
22 told to remove my clothes so they could strip
23 search me. So they put -- made me stand behind
24 the curtain and squat and then put a mirror
25 underneath to make sure you're not taking

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1 Now, the processes you say for raising
2 disputes didn't change, but perhaps the point is
3 that they should have changed. So what I want
4 to understand is, given that your programme
5 board was putting in place a system that would
6 remove the suspense account facility so that
7 subpostmasters had to rely on these helpdesk
8 calls and these so-called Network support
9 processes, did anyone on the programme board
10 offer any kind of challenge to the people
11 responsible for those systems, any kind of
12 constructive challenge to find out whether those
13 processes were working?

14 **A.** No, I don't recall anybody. I mean, I got a set
15 of requirements from the business, you know,
16 through a series of Network -- series of, um, of
17 workshops, and I don't recall, you know,
18 anybody -- in fact, you know, the requirement
19 would have come from the Network to remove the
20 suspense account.

21 **Q.** Who was that, then? Who was responsible for the
22 Network?

23 **A.** I can't remember who was represented at the
24 time.

25 **Q.** Who was on your programme board responsible for

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1 the Network?

2 **A.** I can't remember. I'd have to --

3 **Q.** Do you want to take a bit of time to think about

4 it because you're saying that this is where it

5 came from; this is who wanted it.

6 **A.** No, I can't -- I mean, Peter Corbett was my

7 sponsor and it may have come from Peter. He was

8 in Finance, obviously the impact of that. And

9 I know Ann Cruttenden was the representative at

10 the next level. But I -- I'm really, really

11 sorry. I mean, my memory is -- I have issues

12 with my memory and I just can't remember who was

13 the Network representative on the programme

14 board.

15 But, you know, it would have been signed

16 off -- there was some documents right at the

17 beginning, the business case would certainly

18 have been signed off at -- well, it was signed

19 off at the group board level. So it would have

20 gone through all of that process.

21 **Q.** Did Peter Corbett offer any sort of challenge to

22 find out whether the Network support was as it

23 should have been?

24 **A.** Not -- I can't remember.

25 **MS PAGE:** Well, thank you. Those are my questions.

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1 reducing losses was only one part of what it was

2 all about.

3 **A.** Absolutely, which you saw in the document.

4 **SIR WYN WILLIAMS:** Right. I've got that. So give

5 me an idea of the equivalence of Peter Corbett

6 in other spheres, if you would, so I can

7 understand the make-up of this board? So you'd

8 have had someone of similar seniority to Peter

9 Corbett from which other departments, if I can

10 put it in that way?

11 **A.** I honestly can't -- I'm really sorry but

12 I can't -- we would have had somebody from

13 Network. Ann Cruttenden was the next level down

14 because she was the business change manager from

15 Network and --

16 **SIR WYN WILLIAMS:** I'm sorry to stop you again, but

17 when you say next level down, so in Network

18 terms, there'd be -- are you saying there'd be

19 someone of Peter Corbett's seniority but she was

20 one below that? Is that what you're trying to

21 convey?

22 **A.** No, I was -- I'm not saying she was one below

23 the Network Director. What I'm saying is the

24 programme board may or may not -- it may have

25 not had a director from Network because, as

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1 **A.** Okay.

2 **SIR WYN WILLIAMS:** This programme board that you're

3 giving evidence about, I don't expect you to

4 remember precisely, but just help me a little.

5 Was this a body which was three, four, five

6 people or a larger body?

7 **A.** It would probably have been about five or six

8 people. So Peter Corbett was the sponsor so he

9 would have been on there but then the Network

10 would have been represented, and certainly

11 Peter --

12 **SIR WYN WILLIAMS:** Can I just stop you there. So

13 Peter Corbett and we've got something specific

14 about him, he's the Finance Director, so if

15 I imagine a Finance line so to speak, he would

16 be the senior person on the board in Finance?

17 **A.** Yeah, because remembering that the programme was

18 primarily about implementing new system in the

19 back office, a new SAP system, so the losses bit

20 was not a -- was a -- was a byproduct of the

21 fact that we had to alter the Horizon System.

22 So it wasn't particularly a big network impact

23 project.

24 **SIR WYN WILLIAMS:** No, in general terms, his main

25 concern would have been to reduce losses, but

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1 I say, the change in the Network was nothing

2 like the change in Finance so Peter Corbett ran

3 the programme board. There would have been

4 somebody from Network because there were

5 implications on Network. Ann Cruttenden was the

6 business change manager for the Network so she

7 was the main -- she was the person involved but

8 she wasn't a board member in that sense.

9 I'd have to find a document that had got the

10 names of the board and apologies for not

11 remembering.

12 **SIR WYN WILLIAMS:** All right. So if I wish to

13 enquire into this more closely, I'm looking for

14 the names of four or five other people apart

15 from Mr Corbett, by the sounds of it, roughly?

16 **A.** I'd have to find a document. I honestly can't

17 remember back that far.

18 **SIR WYN WILLIAMS:** I'm sorry to take you back to it

19 again because you've been asked many questions

20 about paragraph 31, one way or another, about --

21 but I'm still slightly bemused, I have to say,

22 about the use of the word "hide". You've put it

23 in inverted commas. What do you actually mean

24 when you say that, historically, the suspense

25 account was used to hide discrepancies? Explain

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1 it to me in your own words. What was happening?
 2 **A.** So there's -- there's no doubt that in the past
 3 there had been people who stole from post
 4 offices, people who ran post offices --
 5 **SIR WYN WILLIAMS:** Can I just stop you there.
 6 I understand that to be, as a matter of fact,
 7 correct. But from my perspective at least, the
 8 last thing that anybody who had actually stolen
 9 money from the Post Office would do was to
 10 signal a loss by putting it in the suspense
 11 account, which is what's bemusing me a little.
 12 **A.** Okay, so they're either going to inflate their
 13 cash and stock balances, but that would
 14 trigger -- that would have triggered an earlier
 15 investigation, because we had a big focus on
 16 cash management. So nobody wanted a branch to
 17 own significant cash. So if you've lost -- if
 18 you've been taking something, at the end of the
 19 day you've got the transactions. The system has
 20 recorded, and then you have a declaration of
 21 cash and stock.

22 So the only way to cover up the difference,
 23 because clearly you won't have the cash and
 24 stock in the system as you should have, and
 25 you're meant to do a translation, then, of the

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1 **A.** It didn't mean that.
 2 **SIR WYN WILLIAMS:** Should I take that view or not?
 3 **A.** No, you should take the view that that meant
 4 that the evidence would have been historical,
 5 but then it was expected that that was still
 6 what they would do.
 7 **SIR WYN WILLIAMS:** But that's surprising me, if
 8 I can put it in that way. The fact that there
 9 may have been illegal activity in the past isn't
 10 a necessarily safe foundation for concluding
 11 it's subsisting at the time, is it?
 12 **A.** No, I wasn't saying it was subsisting; I was
 13 saying historically that had happened and
 14 therefore removing a way for that to continue to
 15 happen was why we had that requirement.
 16 **SIR WYN WILLIAMS:** Okay. Thank you very much for
 17 coming to give evidence, Ms Harding.
 18 **MR BEER:** Sir, thank you very much. Can we say
 19 1.50, please, this afternoon?
 20 **SIR WYN WILLIAMS:** Always assuming Mr Burley is
 21 ready. I had some information that he wasn't
 22 ready until 2.00 but if you know better, then
 23 we'll say 1.50.
 24 **MR BEER:** I never know better. But if he is
 25 available can we say 1.50?

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1 cash and stock, yeah? So the only way to hide
 2 a discrepancy is either to inflate your cash and
 3 stock figures, and cash is probably -- it would
 4 have been an easier one in the system than
 5 stock, because stock is all about stock in,
 6 stock out, et cetera -- so you would either say
 7 "I've got more cash than I really have", or you
 8 would report the cash you really have, and put
 9 the difference in the suspense account.
 10 It's an accounting -- double entry
 11 accounting system, so we have to make it balance
 12 somehow. So if, when you actually count your
 13 cash and stock, it's not what you expected, you
 14 either declare a loss or you try and put it
 15 somewhere and the suspense was a place that you
 16 could put it because you couldn't alter the
 17 other transactions because they were system
 18 generated from having done the transactions.
 19 Does that make sense?

20 **SIR WYN WILLIAMS:** Well, all right. You also used
 21 the word "historically" in that paragraph, which
 22 conveyed to me, when I first read it, that that
 23 was something that had happened in the past, but
 24 wasn't necessarily happening at the time,
 25 ie 2003 to 2006.

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1 **SIR WYN WILLIAMS:** Yes, so everybody should be
 2 prepared to start at 1.50, to use those that
 3 famous phrase: not before 1.50.
 4 **MR BEER:** Thank you very much.
 5 (12.55 pm)
 6 (The Short Adjournment)
 7 (2.00 pm)
 8 **MR BLAKE:** Good afternoon, sir.
 9 **SIR WYN WILLIAMS:** Good afternoon.
 10 **MR BLAKE:** Can I call Mr Mark Burley, please.
 11 **MARK BURLEY (affirmed)**
 12 **Questioned by MR BLAKE**
 13 **MR BLAKE:** Thank you very much. Can you give your
 14 full name, please.
 15 **A.** Yes, Mark Richard Burley.
 16 **Q.** Mr Burley, I'm going to ask for your statement
 17 to be brought up on screen and you should be
 18 able to see it, it's WITN03850100. Is that your
 19 statement?
 20 **A.** It's very blurred at my end. That's better.
 21 Page 1 definitely looks good, yeah.
 22 **Q.** Do you have a copy of it in front of you?
 23 **A.** I do, yes.
 24 **Q.** On 4 January, is it right to say that you signed
 25 a statement of truth that was separate to that

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1 statement but it confirmed the truth of the
 2 content of that statement?
 3 **A.** I couldn't confirm the exact date. Is it on my
 4 signed copy? No. It's not on my copy either.
 5 I can't confirm the exact date but it's around
 6 about that time, yes.
 7 **Q.** Yes. Is this statement true to the best of your
 8 knowledge and belief?
 9 **A.** It is, yes.
 10 **Q.** Thank you. That statement will go into evidence
 11 and the questions I will ask you today will be
 12 supplementary to that.
 13 Your statement is quite light on detail so
 14 I'm going to start by asking you a little bit
 15 about your background. When were you first
 16 employed by the Post Office?
 17 **A.** 1985. It could have been -- I started on
 18 31 December, so I'm just thinking was it '85 or
 19 '84? It might have been '84.
 20 **Q.** Okay. Did you have another job before that, or
 21 was that ...
 22 **A.** I worked for Sainsbury's before that, just to --
 23 as -- I mean, technically, it was a part-time
 24 role but I used to do full time hours for them.
 25 **Q.** Can you give us an indication of the types of

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1 **A.** Essentially, it was to look across the whole of
 2 the technology delivery that Post Office were
 3 doing at that time. So HNG-X was one of those
 4 projects that came under that, but I was no
 5 longer the programme manager for the programme.
 6 **Q.** Thank you. You've said in your statement that
 7 you had programme management qualifications.
 8 Did you have any other qualifications that are
 9 relevant, a computer science background, or
 10 anything along those lines?
 11 **A.** I didn't have computer science background, no.
 12 I had lots of project manager qualifications,
 13 PMO qualifications and, as you say, programme
 14 manager, business analyst qualifications and --
 15 but not a computer science background, no.
 16 **Q.** I'm going to go broadly chronologically this
 17 afternoon. I want to start with Legacy Horizon.
 18 In your witness statement, you say you weren't
 19 aware of any faults with Legacy Horizon but
 20 there were bugs that were investigated and
 21 fixed, to the best of your knowledge. What do
 22 you see as the difference between a fault and
 23 a bug or a series of bugs?
 24 **A.** Well, I'm not even sure I said that in my
 25 statement. Could you tell me where I said that

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1 roles you held at the Post Office before
 2 becoming involved in HNG-X or what we know as
 3 Horizon Online?
 4 **A.** Yeah, I started off as a post office counter
 5 clerk. That was my first role. I then moved on
 6 to be an area manager support. I then moved on
 7 to be a branch manager at three different
 8 branches. I then moved on to an internal audit
 9 role, auditing various processing systems across
 10 the business. I then moved on to be a retail
 11 network manager, essentially accountable for the
 12 performance of around about 35 of the largest
 13 sub post offices.
 14 I then moved into project work, held
 15 a number of project manager positions and then
 16 in 2003 I set up a PMO function, project
 17 management office function, before becoming the
 18 HNG-X programme manager in 2005, which I held
 19 until 2009 before becoming head of delivery, and
 20 then I left on a voluntary redundancy term in
 21 early 2011.
 22 **Q.** Was your role as head of delivery until 2011?
 23 **A.** It was, yes.
 24 **Q.** Can you tell us what the role of head of
 25 delivery involves, briefly?

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1 in my statement because I wasn't that close to
 2 original Horizon. I was only on the periphery
 3 of original Horizon.
 4 **Q.** Your statement is quite brief on that. Let's
 5 have a look at page 2. So it's WITN03850100.
 6 It's the top 2 paragraphs that really address
 7 Legacy Horizon.
 8 **A.** Yeah, and point 6 that I wasn't aware of any --
 9 **Q.** You say:
 10 "I was competent in the use of Legacy
 11 Horizon and was involved in an assurance
 12 rollover its development.
 13 "I wasn't aware of any 'faults' with Legacy
 14 Horizon but was aware it was essentially
 15 a modified EPOS solution and as such errors on
 16 data input could be made with consequential
 17 impacts on weekly accounts."
 18 So that's a suggestion that human errors in
 19 input could have a consequential impact:
 20 "As with any technology solution, bugs did
 21 occur but these were investigated and fixed --
 22 appropriately (to the best of my knowledge)."
 23 So you have distinguished there between
 24 faults and bugs.
 25 **A.** Yeah, I mean, what I'm trying to distinguish

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1 there is when original Horizon went live,
2 I wasn't aware of any overarching faults with
3 the system that could cause a real problem.
4 A bug is something that may not be technically
5 perfect but doesn't cause a problem because
6 there's either a workaround or it's not actually
7 having a direct impact.

8 So, for example, I would describe a bug in
9 this sense to be something in Arial font rather
10 than Times New Roman, for example. It doesn't
11 really have any real impact on the user. Are
12 you still there?

13 **Q.** Yes. So your evidence is that there were some
14 problems but they were ones that didn't really
15 have any real impact on the user?

16 **A.** Yeah, as I recall it, on the original Horizon
17 System, it went through quite an extensive
18 period of what they called acceptance, and that
19 was validating that what the Post Office had
20 asked for had indeed been delivered, and there
21 were numerous examples and I did support some of
22 these where there was a more serious error or
23 a more serious bug, whichever word you want to
24 use, that we would declare wasn't fit for
25 acceptance. In other words, we weren't prepared

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1 system being developed operated according to the
2 required business controls.

3 **Q.** So when it came to testing, you were part of the
4 TIP project, and your role was in relation to
5 the business requirements for the TIP project;
6 is that fair?

7 **A.** Yes, that's right.

8 **Q.** Then we'll look at another document POL00090073.

9 This a document from June 1999. It's headed
10 "Horizon Project -- Acceptance Review Comment
11 Sheet", and it has your name there in the top
12 right-hand corner, as part of a panel in
13 relation to the acceptance review. Do you
14 remember your involvement in that panel?

15 **A.** Well, this panel, this acceptance sheet --
16 I don't recollect a panel as such -- but this
17 acceptance sheet would probably relate to one of
18 the acceptance items that I was asked to look
19 at.

20 **Q.** We've heard a lot of evidence, including expert
21 evidence, of serious problems during acceptance
22 and the rollout of Horizon. Do you accept that
23 there were serious problems during the period of
24 your involvement in the acceptance process and
25 rollout of Horizon?

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1 for the system to go live whilst that bug
2 persisted because it could have a more
3 significant impact on a user.

4 **Q.** Your evidence from a moment ago is that you had
5 quite a peripheral role in relation to what we
6 know as Legacy Horizon; is that right?

7 **A.** I'd have supported a few of the examples of
8 working through the acceptance criteria.

9 **Q.** We'll go through some of the documents, and your
10 name does appear on quite a few documents,
11 concerning Acceptance Incidents in relation to
12 Legacy Horizon. Let's look briefly at a couple
13 by way of early background. We can look at
14 FUJ00058445. This is a document from
15 March 1999. This is a model office testing
16 document. If we go over the page, it has you on
17 the circulation list and you're listed as being
18 part of the TIP project. We know TIP as
19 Transaction Information Processing?

20 **A.** That's right.

21 **Q.** Do you remember your role in relation to that
22 project?

23 **A.** I don't remember the detail of the role but
24 I would have been supporting it from a business
25 assurance perspective, so making sure that the

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1 **A.** All I can say on that is that the elements of
2 acceptance I was involved in, we did the right
3 degree of due diligence and made the
4 recommendation accordingly as to whether it
5 would either be accepted into -- you know, as
6 a minor bug that wouldn't cause an impact or
7 needed to be fixed and therefore would be fixed
8 before we proceeded.

9 **Q.** Let's look at the ones that you were involved in
10 or certainly that the documents show you were
11 involved in, let's look at POL00090478. This is
12 a document the Inquiry is familiar with. Can we
13 look at page 75 it's a list of various different
14 Acceptance Incidents. I'm not going to spend
15 too long on Legacy Horizon, I'll just take you
16 through a few of these documents.

17 So it's page 75 and that addresses
18 Acceptance Incident 410. I'm just going to read
19 what it says about Acceptance Incident 410 and
20 it's got your name down as the owner there. It
21 says:

22 "TIP have detected an instance where
23 transactions received in the daily transaction
24 file are not represented on the electronic cash
25 account at the weekend.

132

1 "The transactions missing from the cash
2 account are associated with a product changing
3 from core to non-core."

4 Do you remember that Acceptance Incident at
5 all?

6 **A.** I don't remember the Incident, no but that would
7 have been, in my view, you know, a high priority
8 Incident that needed resolving.

9 **Q.** Do you know why you're listed as the owner of
10 that particular Incident?

11 **A.** No, I can't tell you why I was listed as the
12 owner. I may have been the one leading the
13 investigation into it but I can't recall what at
14 this time, and that's 24 years ago, nearly.

15 **Q.** Yes. I mean, you would accept that issues with
16 the cash account are quite fundamental to the
17 workings of the Horizon System?

18 **A.** Absolutely critical. I totally 100 per cent
19 agree and that's why, as I suggested, if I was
20 investigating this one, it would have a severity
21 of -- using the scale on the right, it would
22 have a severity of high. It would absolutely
23 have to be understood before it was, you know,
24 accepted to proceed, or indeed fixed.

25 You know, until you get into the detail of
133

1 familiar with now and that relates to data and
2 integrity issues. It's described there as:

3 "TIP derived cash account not equal to
4 electronic cash account received by TIP."

5 As part of the TIP team, do you recall that
6 particular Acceptance Incident at all?

7 **A.** No, I don't recall the specific Incident, no,
8 but clearly that would be a high severity issue
9 that we would not want to go live with.

10 **Q.** Having been -- we've seen part of that TIP team,
11 is that something you would likely have been
12 familiar with at the time?

13 **A.** Possibly. I can't remember the specifics of
14 which ones I was asked to get involved with and
15 which ones I wasn't. As I said, I was involved
16 in some of the Acceptance Incidents but only
17 a subset.

18 **Q.** If we turn over to page 5, we get to Acceptance
19 Incident 410, which is the one that you
20 mentioned you were listed down as the owner of,
21 and that's the second column. If that paragraph
22 there could be expanded, please. It says:

23 "410

24 "This incident was previously recorded under
25 AI376."

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1 these things you don't know the ins and outs of
2 what's truly happened. It could be that it was
3 represented on a different line than the one it
4 was expected to be on just from, you know,
5 a typo in the coding. But, obviously, that's
6 part of the investigation that would need to
7 take place on all these types of incident.

8 **Q.** Can we look at POL00030393, please. This is now
9 moving from July 1999 to August 1999. This is
10 an electronic memorandum from Ruth Holleran; do
11 you remember Ruth Holleran?

12 **A.** Yes.

13 **Q.** What was her role?

14 **A.** As I recall at this time, I think Ruth led the
15 acceptance process, I believe. I couldn't be
16 100 per cent certain on that, so it would need
17 checking factually, please.

18 **Q.** Thank you. You're listed there. Can you see
19 you're copied into that memo, your name --

20 **A.** Yeah.

21 **Q.** -- appears? This is a list of high impact, high
22 severity Acceptance Incidents. If we can turn
23 to page 3, please, in the second column there's
24 reference to 376, that's Acceptance Incident
25 376, that's something the Inquiry is quite
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1 So it appears they were linked:

2 "However as the effect is different, this
3 now stands alone. It refers to a scenario
4 resulting in the TIP derived cash account,
5 calculated from Pathway's daily transaction
6 files, exceeding the transaction totals in the
7 Pathway cash account. (Refer to description of
8 AI376 for more detail on this process). It is
9 this latter cash account stream that feeds the
10 POCL accounting process via CBDB."

11 Does this assist you at all in recalling
12 this particular Acceptance Incident?

13 **A.** It doesn't assist me in recalling the incident,
14 no. All I can say is I repeat what I said, that
15 anything that impacted the cash account and data
16 potentially being missing would have to be fully
17 explained before I would recommend proceeding.
18 Now, you know, as I say, I can't remember this
19 specific one, but we'd have made investigations
20 of both the Pathway solution and also the TIP
21 solution.

22 **Q.** Because that kind of an Incident, that's not
23 just a change from Times Roman Numeral to
24 another font?

25 **A.** Oh, no --

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1 Q. That's quite a significant --

2 A. This is something that, you know -- you know, as

3 I said, I did not manage or lead the acceptance

4 process but my recommendation would have been

5 not to proceed with an Incident like this being

6 open.

7 Q. You say "would have been". Was it or is that

8 something you don't remember?

9 A. I can't recall. I mean, I can almost certainly

10 say that -- well, I can certainly say my

11 recommendation would have been not to proceed

12 with this being open without a satisfactory

13 explanation. I can certainly say that, you

14 know, as I'm on oath. I can't say anything

15 about the specific, because I don't recall it.

16 But, you know, looking at the detail, I'm, you

17 know, trying to be absolutely honest with you.

18 Q. Thank you. Can we turn to page 6, please.

19 Thank you. If we look at the fourth column

20 there, it summarises the current position and

21 a concern of Post Office Counters limited. It

22 says:

23 "POCL also require evidence that integrity

24 checks in support of R818/08 are sufficient for

25 all business data. In the absence of this

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1 line, it says "POCL advised", if we could look

2 at that or highlight those two lines, please.

3 It says:

4 "POCL advised that they rate 410 and 411 as

5 Low conditional on resolution of the controls

6 proposed on 376. RH would provide further

7 detail on this."

8 So it seems as though 410 becomes a low

9 issue because it was going to be in some way

10 tied up with resolution of the controls proposed

11 for Acceptance Incident 376.

12 A. Could you just zoom back out to the full page

13 because I thought there was something on the

14 page that might explain that. Yeah, if you look

15 lower down the page, under point 3, it says:

16 "JD reported as follows:

17 "Pathway recognise that not all transactions

18 had been harvested and sent to TIP.

19 A provisional fix went in on 2nd August and this

20 has worked satisfactorily so far with the effect

21 that all records had been sent."

22 So my assumption would be at this stage --

23 as I say, I'm trying to remember back over

24 23 years -- but my assumption would be at this

25 stage so they'd put a fix in, we'd done some

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1 evidence, the integrity of the data that drives

2 the central accounting process is in question.

3 This incident is therefore adjudged high in line

4 with AI376 and AI411."

5 Is that consistent with what you've just

6 told us about the significance of this kind of

7 an Acceptance Incident?

8 A. That's absolutely exactly what I'm referring to.

9 It would be adjudged high and we would not

10 proceed.

11 Q. Looking at this type of a document, it seems as

12 though from early 1999 you were aware of the

13 importance of accounting data and that issues

14 were being experienced in this regard with the

15 new system; is that fair?

16 A. During its development, yes.

17 Q. Can we look at POL00043681, and can we look at

18 the second page of that, please. This was

19 a management resolution meeting of 12 August

20 1999. You weren't at that -- sorry, if we could

21 zoom out. Thank you very much.

22 You weren't at this particular meeting, but

23 it does address the Acceptance Incident you were

24 listed as the owner of, 410. Can we look at

25 page 3, please. It's the first substantive

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1 provisional early testing of that fix and all

2 looked good but naturally, on something so

3 significant, we wouldn't want to close it until

4 we'd done sufficient testing to be confident

5 that it's truly fixed. I'm sure you probably

6 appreciate that there's lots of different

7 scenarios that contribute to a cash account. So

8 we'd want to make sure all those scenarios are

9 suitably tested.

10 Q. Absolutely. If we look at that paragraph, it

11 then goes on to say:

12 "Pathway cannot guarantee however that all

13 problems have been trapped. They will need to

14 see evidence from the fix of 8 known problems

15 and will continue to monitor the problem for

16 3 months to be confident of its resolution."

17 So at that stage they can't guarantee that

18 all problems have been trapped; does that mean

19 fixed or resolved?

20 A. No, as I say, we would want to do sufficient

21 testing to have a degree of confidence that they

22 have been and then, as you say, keep it under

23 monitor. You know, that's standard practice.

24 Q. Do you recall that there was a second

25 supplementary agreement in September 1999 which

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1 permitted errors of up to 0.6 per cent of all
2 cash accounts?

3 **A.** I don't. I'm not aware of that at all, no.

4 **Q.** Perhaps if we go to POL00090428, and it's
5 page 21. This is the Second Supplemental
6 Agreement between the Post Office and ICL. You
7 may not have seen this because this is
8 a contractual document. I don't know if this
9 jogs your memory at all?

10 **A.** I think it's one of the documents I have been
11 sent but I wasn't party to this and I don't
12 recall it -- I'm just looking --

13 **Q.** If we look at (j), there is a period in which:
14 "... the percentage of Cash Accounts
15 received by POCL across the TIP Interface
16 containing Cash Account Discrepancies shall not
17 exceed 0.6 per cent of all such Cash Accounts."
18 Is that something --

19 **A.** It's not something I'm aware of and, you know,
20 I can interpret what it may mean but I may be
21 taking it out of consequence. This could refer
22 to the fact that we wouldn't pay Fujitsu -- or
23 sorry, Pathway, as they were called then, unless
24 it was in that parameter but that's not saying
25 that 0.6 per cent was acceptable because I can't

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1 a couple of months after the last document you
2 showed me.

3 **Q.** Would you have been expected to be consulted
4 about a contractual agreement of this kind,
5 given your involvement in TIP and being
6 responsible for business aspect of TIP?

7 **A.** I think the answer will be, yes, if it referred
8 to an ongoing allowance but no if it refers to
9 an allowance, you know, over the period of time,
10 such that we would pay Pathway as long as they
11 met this criteria but wouldn't accept it as an
12 incident. I personally believed that's what it
13 would be. It would be a contractual payment
14 term, not a business acceptance term.
15 Otherwise, I would expect to be consulted, yes.

16 **Q.** Do you remember a Third Supplemental Agreement
17 or were you aware of a Third Supplemental
18 Agreement on 19 January 2000?

19 **A.** I wasn't aware of a second so no, I wasn't.

20 **Q.** Let's look at that. FUJ00118186. I'll only
21 take you to that document very briefly. It's
22 page 4 of that Third Supplemental Agreement. It
23 addresses enhanced integrity control, which was
24 something that was implemented to address the
25 concerns relating to the cash account that we've

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1 believe we'd have agreed to anything being
2 acceptable, is my personal view.

3 **Q.** Was there, do you recall, an acceptance that
4 there would still be some degree of cash account
5 discrepancies moving forward?

6 **A.** No. No. There definitely was no acceptance of
7 that. There may have been an acceptance that we
8 believed the fix had resolved the issue, but
9 there is inevitably a risk that something else
10 does arise because you cannot test the system to
11 a degree where you can 100 per cent hand on
12 heart say it will never occur again, and that's
13 what this may relate to, that it is, you know,
14 such a rare transaction or rare sequence of
15 events that causes it that it would be 0.6 per
16 cent. But I can't believe we accepted or
17 anybody would have signed up to accepting that
18 there could be discrepancies on a cash account,
19 if that was the fundamental accounting document
20 to which all branches were held.

21 **Q.** Were you still part of the TIP team at this
22 stage? So this is 24 September 1999.

23 **A.** I honestly can't recall if I was on TIP or on
24 a project at this stage. I'm guessing I would
25 have still been on TIP because it's only

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1 already gone through. Do you remember something
2 called the Enhanced Integrity Control at all?

3 **A.** No, nothing that I would have dealt with would
4 have been called Enhanced Integrity Control. It
5 might have been called a fix, it might have
6 been, you know, the process they were coding to
7 ensure that the cash account was robust but
8 I don't remember it being called an Enhanced
9 Integrity Control.

10 **Q.** If we go over the page, it's paragraph 5.3 of
11 the next page that the Inquiry has gone over
12 some time over previously in Phase 2. This
13 seems to be an agreement, I'll read it to you.
14 It says:

15 "The Contractor shall, from the date of this
16 Agreement until the end of the TIP Integrity
17 Checking Period make available to POCL promptly
18 upon request appropriate experts to explain to
19 POCL the Contractor's analysis of all root
20 causes of Cash Account Discrepancies and the
21 measures which the Contractor shall have
22 implemented in order to prevent the recurrence
23 of any Cash Account Discrepancies which would
24 not have been detected by the Accounting
25 Integrity Control Release."

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1 Do you recall at all there being
2 a likelihood that there would be cash accounting
3 discrepancies which couldn't be detected by
4 a control that was put in place?
5 **A.** I don't recall anything, no, because the TIP
6 system was designed to ensure that what was sent
7 in reconciled with the -- you know, the two
8 sides fully reconciled so, no, I don't recall
9 that at all. Not that -- in other words,
10 I don't recall that it wouldn't have been
11 detected so I'm unclear what that refers to.
12 **Q.** Do you recall an acceptance that, because of the
13 nature of the system, there would always be
14 a degree of unreliability with the cash account?
15 **A.** Sorry, just phrase that question again?
16 **Q.** Sure. Were you aware or do you recall, that
17 because of the nature of the system, there was
18 an acceptance that there would always be
19 a degree of unreliability in the cash account,
20 however small?
21 **A.** No, I don't agree that, I don't accept that.
22 The cash account is only formulated from all the
23 inputs to it and there's no reason that it would
24 ever have to accept or be prone to errors.
25 There's no reason. Effectively, every
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1 know, you accidentally give out, you know, a 20p
2 instead of 10p, so you've got a 10p discrepancy
3 straight away and there were --
4 If I recall at the time, there were examples
5 where it genuinely happened because -- and
6 I think it was books of stamps. If they bought
7 ten stamps they got a slight discount as
8 a customer but it went in effectively at the
9 price -- so the subpostmaster would make,
10 I don't know, 10 pence, 15 -- I can't remember
11 what the product was, so don't quote me on
12 stamps, please, but there was a product that was
13 sold where, if you bought in bulk, you got a bit
14 of a discount. But it worked in favour that you
15 made actually, a slight profit on those.
16 So, you know, that fundamental part of the
17 cash account, the two columns are totalled, and
18 any difference is your loss or gain on the week.
19 It becomes a balancing entry.
20 **Q.** We've gone through quite a few of those
21 Acceptance Incidents. Am I right to say that
22 your evidence, certainly your oral evidence
23 today, is that, despite those, as far as you
24 were aware, the cash account was flawless upon
25 acceptance and rollout?
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1 transaction that is done over a post office
2 counter has double entry on the cash account.
3 **Q.** Can we look at POL00028507, please. We've now
4 reached January 2000 and this is an email, the
5 bottom email, that is sent by you to Min
6 Burdett, regarding something called "Receipts
7 Not Equal to Payments". That's what we know as
8 Acceptance Incident 211, where the receipts and
9 payments didn't equal on the cash account.
10 **A.** Yes.
11 **Q.** Again, do you remember being involved in that
12 issue?
13 **A.** I vaguely remember this one, yes.
14 **Q.** Because that's obviously quite a significant
15 thing if the receipts and payments don't match.
16 What's your recollection of that?
17 **A.** Well, as it says on the subject, the receipts
18 weren't equal to payments and the fundamental
19 thing about the cash account is your receipts
20 payment and your payments total have to match,
21 and any then balancing entry between the two is
22 the amount of loss or gain for the week in
23 question. And, typically, every branch would
24 make, you know, a few pence, a few pounds
25 potentially, difference on a weekly basis. You
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1 **A.** I believe the cash -- you know, my
2 recommendation would be that all cash account
3 errors, as part of the development, have to be
4 either 100 per cent explained, and therefore
5 understandable and wouldn't cause an issue to
6 any integrity, or, ideally, completely fixed
7 ahead of any rollout.
8 **Q.** In the passage I took you to earlier from your
9 witness statement, you said that the system was
10 essentially a modified EPOS solution. Were you
11 aware of any concerns about the EPOS system and
12 the coding of the EPOS system, for example?
13 **A.** Um, it depends what you mean by was I aware of
14 any concerns. During the development there
15 were, you know, numerous defects identified, you
16 know, that would have been identified through
17 testing. Some of it identified through
18 Pathway's own testing, some through Post Office
19 testing and they would all go in this part of --
20 you know, ultimately to try to get fixed and,
21 ultimately, against the acceptance criteria, if
22 they remain open.
23 **Q.** What point in time did this all get resolved, do
24 you think?
25 **A.** To the best of my knowledge and from my part in
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1 it, I believe it was all resolved before,
2 certainly, any extended trial was done. It may
3 have been -- there may have been a few small
4 issues outstanding at the onset of the first
5 trial. I can't 100 per cent confirm they
6 weren't, but sometimes that does happen. But
7 before it went out to any extended number of
8 sites, I would believe they would all be
9 resolved, such that integrity-wise, it was
10 robust.

11 **Q.** If we've heard evidence to the contrary, would
12 that surprise you?

13 **A.** It would surprise me as far as my involvement
14 would go. I would just say one thing. Of
15 course the system, once the system is live, it's
16 not completely left alone because we do -- you
17 know, like most systems, you develop new
18 products, so you do make changes to it. So
19 it's -- you know, could something have happened
20 after that? I can't comment for certain, but
21 possibly.

22 But if you're saying to me original
23 integrity issues were allowed to be rolled out,
24 were allowed to be included in the rollout, I'd
25 be 100 per cent surprised and shocked.

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1 numbers but a medium volume pilot might be
2 extending from an initial pilot of ten sites up
3 to, let's say, 150, 200 sites, and the high
4 volume would be where we're migrating from that
5 and perhaps doing 100 sites a night to roll out
6 the entire estate.

7 **Q.** You weren't a technician. You weren't -- as you
8 have explained, you didn't have a computer
9 science background or anything of that sort.
10 What was your role in relation to the pilots?
11 Was it driving things forward?

12 **A.** So my role as HNG-X programme manager was to
13 ensure we delivered a quality system.

14 **Q.** Let's start in January 2010. Can we look at
15 FUJ00092754. This a document from 28 January
16 2010. It's the "Notes of the Horizon Next
17 Generation Joint Progress/Release Board
18 Meeting", and you are listed there as chair of
19 this meeting. Can you tell us what was this
20 board? What was its purpose?

21 **A.** The purpose of this board, it was a weekly
22 meeting to discuss the progress of the
23 development, you know, and obviously development
24 leading into testing, leading into deployment,
25 on the new Horizon next generation system. So

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1 **Q.** At the beginning of your evidence today you said
2 you had quite a peripheral role in Legacy
3 Horizon. Having looked at those documents and
4 your name on various documents including
5 ownership of an Acceptance Incident, do you
6 think that was underplaying things somewhat?

7 **A.** No, because I wasn't looking at the development
8 to the Horizon System as a full-time role. You
9 know, I was involved with acceptance but
10 I wasn't leading acceptance. I was potentially,
11 you might describe it as leading a few of the
12 items under acceptance.

13 **Q.** Once you had finished your work on the
14 acceptance of Legacy Horizon, did you go on to
15 a different role before getting involved in what
16 we know as Horizon Online?

17 **A.** Yes, yes.

18 **Q.** I'm going to move on now to the development of
19 HNG-X. We'll see, in documents we're going to
20 come to, references to a medium volume pilot and
21 a high volume pilot. Can you tell us briefly
22 what that means, what the difference is between
23 the two?

24 **A.** It's just the scale of which we would roll out
25 to the number of sites. So I can't remember the

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1 it's a weekly meeting we held jointly with
2 Fujitsu to discuss anything to do with ongoing
3 development activities.

4 **Q.** Can we look at page 3, please. Thank you, it's
5 the first shaded entries. We have there "AD",
6 that's Alan D'Alvarez. Do you remember Alan
7 D'Alvarez?

8 **A.** I remember Alan, yes.

9 **Q.** He worked at Fujitsu; is that right?

10 **A.** He did, yes.

11 **Q.** He's listed there as programme director, HNG-X,
12 Fujitsu. I'm going to read that third column.
13 It says:

14 "The delay in the commencement of volume
15 testing means that we will not be able to
16 perform a significant amount of testing before
17 commencing the Medium Volume Pilot. Hence we
18 will need a significant amount of data to be
19 collected from the live branches and Data
20 Centre. The data will also require careful and
21 thorough analysis.

22 "AD to confirm how this will be achieved."

23 Do you recall there being less testing than
24 originally planned before going to pilot?

25 **A.** No, there wasn't less testing. We may have

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1 varied how we did the testing but there wasn't
 2 less testing. One thing that was very, very
 3 clear on Horizon Next Generation was that
 4 quality was of the utmost importance. With any
 5 project that is delivered, you generally have
 6 three criteria: you have the time it takes to
 7 deliver it; the cost to deliver it; and the
 8 quality criteria that it must meet. I can
 9 honestly say, as programme manager, that quality
 10 criteria was the utmost of those three.

11 Inevitably there's always a little focus on
 12 all three and the amount of forecast varies from
 13 project to project, but quality was the most
 14 important. And, you know, I know several times
 15 throughout the development and testing of the
 16 solution, we paused, we took a step back, and
 17 because of testing, because of -- we couldn't
 18 get the right data or whatever, to absolutely
 19 make 100 per cent sure we'd got the right answer
 20 before proceeding.

21 **Q.** Thank you. That's what you've said in your
 22 statement but if we look at this particular
 23 entry:

24 "The delay in the commencement of Volume
 25 testing means that we will not be able to

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1 this detail here, and has satisfied himself that
 2 what we needed to be assured, through the
 3 testing, has actually been done. Now, whether
 4 that's through a test or through the data that's
 5 effectively been through the system, it's given
 6 us the same result, is what that's telling me in
 7 the fourth column.

8 **Q.** Forgive me for -- I don't quite understand what
 9 you're saying there because, I mean, certainly
 10 a plain reading of that is there won't be
 11 a significant amount of testing and instead
 12 there's going to be provision of data. Am
 13 I wrong to think that there is a difference
 14 between getting hold of data and actual testing
 15 or are you saying they're the same thing?

16 **A.** They're clearly different things but the data
 17 can give you the proof that what you'd have done
 18 in the testing is actually sufficient. So the
 19 data can give you the same proof, is what I'm
 20 saying.

21 **Q.** So is data, collection of data, an adequate and
 22 an equivalent to a significant amount of
 23 testing, or is it less than a significant amount
 24 of testing?

25 **A.** In this particular scenario it was clearly

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1 perform a significant amount of testing before
 2 commencing the Medium Volume Pilot."

3 What do you understand that to mean?

4 **A.** I took that to mean that we've got a different
 5 way of doing it because we've actually got -- if
 6 you're looking on the right, Dave John's was
 7 leading on it and LF is Lee Farman. Lee Farman
 8 was my test lead at the time and, you know,
 9 I would have taken, you know, his advice on
 10 this, that if he said, you know, he was
 11 comfortable that the slight change to the
 12 approach on testing gave him sufficient
 13 confidence, then that was acceptable, and that's
 14 why it would have been closed. Because you'll
 15 see data has been pass to Lee Farman, Lee Farman
 16 believed this is adequate for now.

17 **Q.** Tell me if I'm wrong on this but it doesn't seem
 18 to suggest that there's a different type of
 19 testing. What it seems to suggest is that there
 20 won't be a significant amount of testing, and
 21 instead there's going to be a collection of
 22 data. Am I wrong on that?

23 **A.** It depends how you want to read it. Lee has
 24 looked at the data that has been collected from
 25 the existing sites, you know, from looking at

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1 considered to be an equivalent to the test.

2 **Q.** What gives you that impression?

3 **A.** Because Lee Farman who was a robust external
 4 tester, so he wasn't Post Office, he wasn't
 5 Pathway, he was actually bought in from
 6 external, gave me that confidence and would have
 7 explained it to me at the time.

8 **Q.** It says there "adequate", it doesn't say
 9 "equivalent". Adequate seems to be less than
 10 significant testing, doesn't it?

11 **A.** Well, I think the testing at any point it's
 12 adequate for now. You'd want to do more testing
 13 before you went into a high volume pilot is what
 14 that says. Adequate to get into the medium
 15 volume pilot. That's what it's saying. It
 16 based on my interpretation of the word
 17 "adequate". The way I read that is it's
 18 adequate for now. In other words, Lee is happy
 19 that it gives us what we need for the medium
 20 volume pilot.

21 **Q.** If somebody were to say that you were, at this
 22 stage, desperate to get on with the medium
 23 volume pilot; would that be right?

24 **A.** That would definitely be wrong because nobody
 25 ever put me under pressure to get on with

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1 anything. We were always wanting to progress to
 2 timescales but we wanted to progress to
 3 timescales in the right way.

4 **Q.** Was the impression that you got from Post
 5 Office -- more broadly rather than just
 6 yourself -- one that you were desperate, as
 7 a company, as an organisation, to get on with
 8 the medium volume pilot?

9 **A.** That's what I -- I totally refute that
 10 suggestion. That is 100 per cent factually not
 11 correct. At times, you know, there were times
 12 definitely when, you know, people would say to
 13 me, you know, "Why are we not ready?" And
 14 I would explain why we're not ready. And at no
 15 point under my time as HNG programme manager was
 16 I under pressure, or as delivery manager, was
 17 I under pressure to hit a timescale at the
 18 expense of quality. I would be expected to
 19 explain it in certain situations, but never
 20 under pressure.

21 **Q.** In your statement, you say at paragraph 18 "With
 22 any computer system there's always likely to be
 23 bugs and this is the purpose of testing."
 24 Less testing might mean more bugs, mightn't
 25 it?

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1 has affirmed that what he saw in the data gave
 2 us the same result as he would have expected
 3 from testing to move into that medium volume
 4 pilot. That was the key of that bit: it was to
 5 move into that medium volume of pilot and it was
 6 to look at the performance of the system and
 7 performance in that sense would be is it holding
 8 up speed-wise to be able to process
 9 transactions? You know. It's not functional.

10 **Q.** Can we just go back to FUJ00092754. Page 3.
 11 Does Lee there say that it gives the same
 12 result?

13 **A.** Is that a question for me?

14 **Q.** Yes. Your evidence was that Lee has said to you
 15 that the collection of data, rather than
 16 significant testing, gives the same result. But
 17 I was just wondering if that's your recollection
 18 or if that's something that's stated there?

19 **A.** Well, yeah, in my opinion. I mean obviously
 20 this is written by a PMO who takes the notes and
 21 their choice of wording. Now, can I edit the
 22 choice of wording? Of course I can. As program
 23 manager, anybody can challenge the wording in
 24 hindsight but my absolute recollection is Lee is
 25 saying this is adequate for now, for what we

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1 **A.** In theory, yes, but not necessarily in practice.
 2 With testing what you do, you agree an approach
 3 to testing of a strategy and an approach for
 4 specific phase of testing, if you like, that
 5 gives you sufficient confidence. Now, with any
 6 system I would suggest it's almost impossible to
 7 be 100 per cent guaranteed that no further bugs
 8 remain, but you do sufficient testing, depending
 9 what it is you are developing, rolling out,
 10 deploying, that gives you the confidence it will
 11 work satisfactorily against what it's intended
 12 to do.

13 So, obviously, something like, you know,
 14 I don't know, a space rocket, you would do much
 15 more testing on. So you'd vary the testing
 16 according to what it is you're developing. It's
 17 a standard approach called a risk based approach
 18 to testing but you cover off the things that are
 19 absolutely going to cause the -- any risk.

20 **Q.** If you intended to carry out significant
 21 testing, and that was replaced with a lesser
 22 form of testing or a different or a collection
 23 of data, might that mean that there may be more
 24 bugs?

25 **A.** No, because in that scenario, as I've said, Lee

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1 would have tested, to get into the medium volume
 2 pilot. That's what I am recalling on this one.
 3 We wouldn't have gone into that medium volume
 4 pilot without a sufficient confidence.

5 **Q.** Can we look at POL00000874, please. This is the
 6 Fujitsu's own testing and integration strategy.
 7 If we have a look at this document it's
 8 a Fujitsu document but if we look at the bottom
 9 it has external distribution and it's something
 10 that has been sent to the Post Office library
 11 and Andrew Thompson -- do you know Andrew
 12 Thompson? Do you recall who he was?

13 **A.** Andrew was one of the test leads with Lee.

14 **Q.** I'm going to --

15 **A.** I dealt with Andrew primarily -- if I recall
 16 correctly, Andrew primarily looked after
 17 functional and Lee looked after non-functional
 18 performance.

19 **Q.** Can we look at page 12 of this strategy and it's
 20 paragraph 1.25 on page 12 that I'd like to look
 21 at.

22 This is Fujitsu's testing strategy and it
 23 says:
 24 "As a general philosophy, it is important to
 25 accept that no system can ever be confirmed as

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1 completely error-free. It is not possible to
 2 prove it. Tests can prove that an error exists.
 3 They can prove that a previous error has been
 4 corrected. They cannot prove that no further
 5 errors remain. However, by concentrating on the
 6 important characteristics of the system
 7 operation, tests can be used to demonstrate the
 8 progressive removal of errors to the point where
 9 these characteristics are seen to conform to
 10 expectation. So, testing can be seen as
 11 a method (the primary method) of reducing the
 12 risk of serious defects remaining in important
 13 areas of the system."

14 Is that something you agree with?

15 **A.** Yeah, that's the risk-based approach to testing
 16 that I referenced a couple of minutes ago.

17 **Q.** Yes. So it says testing there is either the
 18 primary method of reducing the risk of serious
 19 defect, it doesn't say there that data,
 20 gathering data is an adequate replacement for
 21 tested, does it?

22 **A.** Well, it doesn't say it, no.

23 **Q.** If Fujitsu had the impression, rightly or
 24 wrongly, that POL were desperate to get on with
 25 the pilot and, as a consequence, reduced the

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1 acceptance on original Horizon. This is the
 2 board that looks after are we ready to authorise
 3 the release of Horizon into the branches.

4 **Q.** Can you tell us what AG, Acceptance Gateway, 3
 5 was?

6 **A.** I can't remember what AG3 was. I'm assuming it
 7 was, looking at the date, probably entry into
 8 pilot but I can't be 100 per cent certain.

9 **Q.** Can we turn over the page and it has there "New
 10 Actions and points to note from combined meeting
 11 of [21 January 2010] -- ACCEPTANCE". It's that
 12 first shaded section I'd like to look at first.
 13 It says there:

14 "DC [that's, I think, Dave Cooke the Fujitsu
 15 acceptance manager] confirmed that there were no
 16 outstanding High Severity Acceptance Incidents
 17 and that all other thresholds are within
 18 tolerance for Acceptance Gateway 3."

19 I just want to look at the third paragraph.

20 It says:

21 "However it was agreed that the high
 22 priority fixes in 'Reset 4' -- to be delivered
 23 as part of Maintenance Release 01.08 -- could
 24 constitute a High Severity AI if not delivered
 25 in time for the High Volume Pilot (over 272

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1 testing, what kinds of problems would you
 2 envisage?

3 **A.** Well, Fujitsu couldn't reduce our testing. They
 4 could reduce their testing but not our testing.

5 **Q.** If testing, any testing, was reduced, because of
 6 an impression, rightly or wrongly, that was
 7 given, that you needed to get on with the pilot,
 8 what was the risk in that?

9 **A.** Well, but it wasn't. Testing wasn't reduced
 10 because we were under pressure to get on with
 11 the pilot.

12 **Q.** I'll ask once more. If it was, what would the
 13 risk be? Reading that, what is the risk of
 14 reducing testing?

15 **A.** Well, the risk is you're risking more bugs going
 16 forward.

17 **Q.** Thank you. Can we look at FUJ00097159, please.

18 We're still on 28 January and this seems to be
 19 a different board meeting. This is called the
 20 "Horizon Next Generation Release authorisation
 21 AG3 -- Joint Board". How is this board
 22 different? Do you remember this board?

23 **A.** This will have been the board -- I vaguely
 24 remember it -- this will be the board that
 25 looked at, you know -- very similar to the

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1 branches)."

2 Then if we scroll down to the next entry, it
 3 seems clear from that that there weren't any
 4 outstanding high severity Acceptance Incidents,
 5 but, as we've heard, there's the potential for
 6 there to be one --

7 **A.** Yes, it strikes me from that that there was high
 8 severity Acceptance Incidents that had been
 9 fixed but the fix hadn't actually been deployed
 10 yet, reading those words and therefore was
 11 subject to fully being signed off, if you like.

12 **Q.** Then we have look at that final entry. It says,
 13 "Non-High priority items in Reset 04":

14 "MB [I think that's yourself] offered
 15 an option to remove items from Reset 04 which
 16 are not regarded as High priority -- if they are
 17 risk of missing the High Volume Pilot deadline
 18 or affecting the delivery of items which are
 19 High priority. AD will consider if any items
 20 are at risk [that's Alan D'Alvarez], and liaise
 21 with Post Office ..."

22 Is this something you remember at all?

23 **A.** I don't recall it, not as such.

24 **Q.** It seems as though you're offering there to
 25 remove some items from what's called Reset 4

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1 which weren't regard as high priority.

2 **A.** Yeah, and that's quite possible, if there were
3 things on there that weren't high priority and
4 therefore weren't considered material risk, then
5 to proceed through this gateway -- and don't
6 forget I think it's important to recall that
7 when we're in a pilot you're getting more
8 evidence from the pilot of any potential
9 problems. So, you know, we would have, you
10 know, looked at anything that wasn't classed as
11 high priority and said "Is that material to
12 proceeding to the next phase?" It's not saying
13 we're actually going to remove them; it's saying
14 we'll look at removing them.

15 **Q.** Was that because the priority at that stage was
16 to get the high volume pilot going and get on
17 with acceptance, given previous historic delays?

18 **A.** No. The priority was to deliver a quality
19 system, but with any system you would look at
20 the lower priority items and say "Is this
21 important for moving forward at this stage?"
22 Yes, no. And you'll see there that it is being
23 progressed by the POL and Fujitsu testing and
24 requirement teams. So we wouldn't have put
25 anything, given exception to anything that we

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1 error messages had occurred at both offices
2 which meant that their Branch Trading Statements
3 could not be completed.

4 "The root cause position at Coton House was
5 understood, but the Warwick office had
6 additional complexities.

7 "It was confirmed however that in both cases
8 the underlying data integrity and external feeds
9 to POL-MI and POL-MS were not affected."

10 Next entry.

11 "Double settlement at Derby. In addition to
12 the above, there have been 2 instances of
13 a transaction appearing to be settled twice.
14 This was picked up by the standard
15 reconciliation process and corrected via BAU
16 processes. However, the root cause is yet to be
17 identified and investigation is under way".

18 The third entry "Decision -- Postponement of
19 the next 10 branches. Based on the lack of
20 a known root cause for AG3.70 [so AG3.70 is the
21 branch trading statements issue] and AG3.71
22 [that's the double settlement issue], it was
23 agreed that the next 10 branches should be
24 postponed until the impact and way forward is
25 fully understood."

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1 didn't get approval from.

2 **Q.** Absolutely, but were you making it easier there
3 for Fujitsu so that they could meet the high
4 volume pilot deadline by removing non-essential
5 items?

6 **A.** Not easier, no. It's a standard approach to
7 saying we need to look at the items on the list
8 that are outstanding.

9 **Q.** So again, at this stage, still at 28 January,
10 would it be unfair, I think you've said yes
11 before, to say that you were desperate to get on
12 with the pilots?

13 **A.** Would it be unfair? Yes, it would be unfair.
14 I think the word you're using there is
15 "desperate to get on with". Keen to get on
16 with, I'd say, is fair. But "desperate",
17 definitely not.

18 **Q.** Can we look at page 9 of this document. It's
19 the bottom of page 9 I'd like to look at. "New
20 Actions and points to note from the combined
21 meeting of [28 January]".
22 I'm going to read to you the first three
23 entries. So the first one:
24 "Branch Trading Statements at Coton House
25 and Warwick. It was confirmed that onscreen

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1 Do you recall those issues at this time?

2 **A.** No, I recall the Warwick and Coton issue.
3 I vaguely recall -- I don't recall the Derby
4 specifically but I recall a double settlement,
5 yes, and I think the decision in 372 absolutely
6 reaffirms, you know, this was not a time
7 pressure; this was, you know, getting it right.
8 And I can explain to you the 371 and 370, if you
9 like, if it helps.

10 **Q.** We can get on to them but your evidence is that,
11 28 January, the postponement of the next ten
12 branches shows that you weren't in a rush to get
13 on with things, is that --

14 **A.** It shows we weren't pressured into getting on
15 with things, yes.

16 **Q.** Can we look at FUJ00092875. It's page 3 of that
17 document. Thank you. This is an email from
18 Alan D'Alvarez of Fujitsu, of 3 February. So
19 very shortly after that, just a few days later.
20 This is, I believe it's an internal Fujitsu
21 email but do correct me information I'm wrong on
22 that. Do you recognise the names there? You're
23 not copied into that?

24 **A.** I think they're all Fujitsu resources, yes.

25 **Q.** Thank you. Let's look at point 1. It says:

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1 "The decision has been taken to deploy HNG-X
2 to a further 10 branches with the migration
3 button being pressed tomorrow for migration to
4 complete Friday."

5 So the decision to postpone due to, for
6 example, the branch trading statement issue that
7 we just saw and the double settlement issue that
8 we just saw seems just a few days later to have
9 been reversed. Do you remember that?

10 **A.** Yes, I do remember that.

11 **Q.** Then we look at point 2:

12 "There are two issues that require fixing
13 prior to being able to enter into a medium
14 volume pilot:

15 "Branch Trading Statement: This is where the
16 in day migration process that happens once
17 a branch hits the migration button is not
18 correctly migrating across the summary data.
19 This data is used to produce the branch trading
20 statement. The base data is being migrated
21 correctly and therefore the central accounting
22 is unaffected. However, should a post office
23 manager do a trading statement in branch there
24 is a high chance that the statement produced,
25 which uses the summary data, will not reconcile.

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1 Horizon System so that can be remigrated onto
2 Horizon Next Generation.

3 **Q.** So would the entry that's created by Fujitsu
4 technicians show up on the branch trading
5 statement as a different figure?

6 **A.** I can't actually remember how it worked in terms
7 of the correction, I'm sorry.

8 **Q.** Turning to the second one:

9 "Counter Pauses In Live: Yesterday and today
10 a number of branches reported 'screen freezes'
11 while operating HNG-X."

12 So you have two uses there that require
13 fixing before entering into the medium volume
14 pilot. Then paragraph 3 it says:

15 "Currently the team are still investigating
16 both issues above and, as yet, have not
17 determined the root cause for either."

18 Do you remember that at that stage?

19 **A.** I remember that, yes.

20 **Q.** Then it's paragraph 4 that I want to spend a bit
21 of time on, and it says:

22 "We had a meeting with Post Office this
23 evening which Mark Burley led from the Post
24 Office side. Post Office are desperate for
25 a date to start planning/rescheduling medium

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1 We are manually 'fixing' the summary data prior
2 to the BTS being run for those branches already
3 migrated."

4 Just pausing there, what do you understand
5 by "manually fixing" the summary data.

6 **A.** So basically when the branches were migrated on
7 to HNG, it was an automated system that migrated
8 the data from their existing solution on to
9 Horizon Next Generation, and this was an error
10 that occurred in certain circumstances. So what
11 happened, we identified the root cause of the
12 error, and what happened was Fujitsu knew where
13 it was, but we decided to continue with the ten
14 because this migration process -- obviously it
15 only happens when you migrate a branch. So, you
16 know, the best test for this is when you migrate
17 a test but you just need to make sure you've
18 absolutely got a control total, which you can
19 then manually fix should any other data not
20 migrate successfully. That's what that manually
21 fixing meant.

22 **Q.** How would it be manually fixed?

23 **A.** Well, by the migration team comparing what
24 should be there with what's actually there and
25 then making the appropriate entry onto the

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1 volume pilot. They accepted our position that
2 we were not able to give this today. I expect
3 that Mark will be keeping Dave Smith briefed and
4 my reading is that if we are not in a position
5 to give a target date by close of play tomorrow
6 it is likely to result in an escalation to Mike
7 Young."

8 So that's where we get the phrase

9 "desperate" from. Was Alan D'Alvarez wrong when
10 he said you were "desperate"?

11 **A.** I don't know why he used that word, so I think
12 that's a question for Alan.

13 **Q.** Was there pressure being put on Fujitsu by the
14 Post Office and by yourself to get on with
15 things?

16 **A.** Not to the extent that it would be desperate.
17 Clearly, for the migration, we have to plan and
18 schedule the migrations. You know. So we have
19 to give the officers that are due to migrate due
20 notice because, you know, we would do that out
21 of hours, typically. They may need resources in
22 place. They have to, you know, prepare
23 themselves for that migration. So, you know, in
24 terms of, you know, we would want a date that we
25 are targeting. Now whether that date was

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1 tomorrow or next week or next month, we want
2 a date because we want to start the planning
3 process, not desperate to get it going,
4 necessarily.

5 I think it's -- the -- not a term I would
6 have used. You know, we need a date, such that
7 we can continue with our planning rescheduling
8 exercise.

9 **Q.** Can we keep that on screen but just put
10 alongside it your witness statement,
11 WITN03850100. It's page 4 of your witness
12 statement, paragraph 16.

13 Thank you. Paragraph 16. You say there:

14 "As Programme Manager, the one person who
15 would have been under pressure to migrate to
16 HNG-X quickly would have been myself. Through
17 demonstrating how we, as a team, were holding
18 Fujitsu to account on quality, there was never
19 any pressure to migrate before we had signed off
20 readiness."

21 Do you see the contrast there between what
22 you've said in your witness statement and what
23 Mr D'Alvarez was saying at the time?

24 **A.** No, I don't. I'm sorry, but you're reading that
25 different to how I'm reading it. "Post Office
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1 **A.** As I said, what is said and how things are
2 interpreted can be two different things. Would
3 I have said, "Alan, come on, I need a date, we
4 need to start, you know, and get these
5 replanned, rescheduled", yes, I probably would
6 say something like that. But, you know, there's
7 a difference between saying that and saying,
8 "Come on, Alan, I need to get these started
9 again tomorrow, we're already behind plan".
10 That is definitely not something I would have
11 said.

12 And you'll notice there they accepted our
13 position that we're not able to give this today
14 and, yes, I would want to keep them, you know,
15 under a little bit attention that we're wanting
16 a date because, as I said, scheduling and
17 planning the branches, it wasn't a dead
18 straightforward task. It takes time. You have
19 to accommodate, you know, things that the office
20 might have planned, you know, and, you know, we
21 have to share appropriate evidence with other
22 parties who were, you know, who, you know, for
23 example with the National Federation of
24 SubPostmasters, who I brought in to also give
25 assurance before we deployed.

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1 are desperate for a date to start
2 planning/rescheduling". It doesn't say we're
3 desperate for a date that has to be imminent.
4 At no point -- I repeat, at no point was I put
5 under pressure from a timescale perspective.
6 I think it's just how you've chosen to read the
7 two statements are different.

8 **Q.** By that stage, how long had HNG-X been planning
9 for?

10 **A.** It depends what you mean by "planning". It had
11 been running, if this was February, the best
12 part of three and a half years.

13 **Q.** Was one of the reasons that you were brought in
14 to the project to drive things forward?

15 **A.** Sorry, was it what, sorry?

16 **Q.** Was one of the reasons you were brought into the
17 project to drive things forward?

18 **A.** In the sense that a programme manager drives
19 anything forward, yes.

20 **Q.** Yes. Do you not think that Fujitsu might have
21 felt some time pressure by this stage?

22 **A.** I think that they felt time pressure for
23 themselves, yes.

24 **Q.** But your evidence is that that pressure wasn't
25 coming from the Post Office?
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1 **MR BLAKE:** Thank you, sir. That might be
2 an appropriate moment to take our 15-minute
3 break.

4 **SIR WYN WILLIAMS:** All right, 15 minutes. So
5 3.20-ish, I suppose to be imprecise.

6 **MR BLAKE:** Thank you.

7 **SIR WYN WILLIAMS:** Have a short break, Mr Burley,
8 all right. We have a break in the afternoon and
9 the morning because the person transcribing the
10 evidence needs a break, all right?

11 **A.** Okay, do I dial off?

12 **SIR WYN WILLIAMS:** No, mute yourself and go off
13 screen and go for a walk but don't break the
14 connection, all right?

15 **THE WITNESS:** Okay.

16 (3.10 pm)

(A short break)

18 (3.22 pm)

19 **MR BLAKE:** Thank you very much, Mr Burley. We're
20 back. I'm going to return to the issue of the
21 BTS, the branch trading statement and can we
22 look at FUJ00094268, please. We're still in
23 February 2010. This is an email chain. It's
24 an email chain that's not ideal from
25 a formatting perspective, so it may take us

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1 a little bit of time to go through. This is
2 page 10 and you'll see there is an email from
3 Geoff Butts, and if you look down it is to Will
4 Russell, yourself and Barry Evans. Who are the
5 other two?

6 **A.** Will and Barry led the migration activity.

7 **Q.** Thank you. If we scroll down and over the page,
8 there's the email from Geoff Butts. He says:

9 "Both,

10 This is to confirm the position on a fix for
11 the BTS [the branch trading statement] issue
12 whereby printing the Trial Balance Report for
13 BTS results in incorrect data being displayed in
14 the Final Balance Report. A fix can be
15 delivered and tested for inclusion within the
16 01.08 Maintenance Release as a counter fix. In
17 the meantime, branches need to use the BTS Trial
18 Balance Report, which is correct, and discard
19 the BTS Final Balance Report, which is
20 incorrect."

21 Do you remember this issue?

22 **A.** Vaguely, yes. I think it's linked to the one we
23 talked about before.

24 **Q.** So we saw the one related to Coton House and
25 Warwick.

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1 to the cash account. It's basically, you know,
2 it's their accounts.

3 **Q.** Can you tell us what you're saying there?

4 **A.** Well, basically, I'm saying that why do you rely
5 on the trial balance and not the final balance
6 because the final balance, ultimately, is the
7 one that's important. Now, I don't know what
8 his response was on this but it might be it was
9 just on the printout that it was causing the
10 problem and not on the actual system stored
11 data, you know, but you'd still expect there to
12 be a Known Error Log, even if it is just on the
13 printout.

14 **Q.** That's so that the message can be communicated
15 to subpostmasters that there is a problem with
16 quite a significant document that, as you've
17 said there, is a legal document or used in legal
18 proceedings?

19 **A.** Well, I'm -- 100 per cent. And don't forget,
20 I think it's worth pointing out at this stage
21 that we had a subpostmaster group as part of our
22 release authorisation process. You know,
23 I bought in the part of the NFSP to support and
24 be comfortable with what we were doing. So they
25 would also -- you know, I'd expect them to sign

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1 **A.** No, this is the one relating to the migration
2 and the incorrect, when they migrate, this will
3 be the -- because they used to run a BTS, branch
4 trading statement, when they'd migrated the
5 data, to prove that it had migrated correctly.

6 **Q.** Here the suggestion is that a work around is
7 possible until it can be fixed.

8 **A.** Yeah.

9 **Q.** You respond, page 9 is your response. You say
10 there:

11 "Geoff

12 "Thanks but can I ask who you have agreed
13 this workaround with? This is a legal document
14 and there is a difference between a trial
15 balance and a Final Balance? I would also
16 expect CS ..."

17 Is that Customer Service or?

18 **A.** I can't -- I'm guessing so.

19 **Q.** "... to have a KEL [Known Error Log] for this --
20 if agreed -- to be able to explain the position
21 to any subpostmaster who calls in.

22 "Graham to confirm please."

23 Do you remember this response?

24 **A.** Well, vaguely, yes. I mean, it is a long time
25 ago but vaguely I remember it, yeah. It's back

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1 it off as well.

2 **Q.** So are you saying they would have known about
3 this specific issue?

4 **A.** Yes, because, you know, absolutely. I brought
5 the NFSP in because I wanted them to be
6 comfortable with what we were doing and what we
7 were deploying.

8 **Q.** How would you share this kind of information?

9 **A.** Well, we had tripartite meetings with them, and,
10 you know, I would just share it open and
11 honestly because, you know, they need to be
12 clear, you know. What I'd typically do with
13 something like this is ask for some sort of
14 demonstration of what's happening and for them
15 to sign up to that it's either okay or,
16 actually, if I didn't think it was okay, I might
17 not even share it because there's no point
18 sharing something that I've said no -- you know,
19 if we agree it's not fit for purpose with
20 Fujitsu and they have to put a full fix in with
21 the final balance, and that's why I'm asking the
22 question I'm asking, you know, who they've
23 agreed it with.

24 **Q.** So you do recall or don't recall this specific
25 issue being mentioned to the NFSP?

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1 A. I don't recall whether this specific issue was
 2 mentioned to the NFSP or not.

3 Q. Can we look at page 7. It's been escalated to
 4 Alan D'Alvarez within Fujitsu or sent to Alan
 5 D'Alvarez. It says there -- sorry, it's the
 6 page before. Thank you.

7 It says:
 8 "Alan
 9 "Just rang Geoff but he is on leave -- would
 10 you be able to help with this one please.
 11 "Would you please send any history regards
 12 this issue -- specifically what the differences
 13 in the Final report are, and can you advise how
 14 Fujitsu have established that the trial report
 15 is correct -- and that there is no corruption of
 16 the data.
 17 "A speedy response would be appreciated as
 18 I need to explain this issue to our Finance
 19 colleagues in more detail."
 20 That's from Phil Norton, who is at the Post
 21 Office, that's a colleague of yours?

22 A. Yes, who used to work for me on Horizon Next
 23 Generation, yes.

24 Q. So what's happening with these branch trading
 25 statements is it's the final report that's wrong
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1 Trial BTS.
 2 "There is a bug in the way that the report
 3 is produced such that some of the in-memory copy
 4 of the data is overwritten when the Trial BTS is
 5 produced.
 6 "A consequence of this is that when the
 7 final BTS is produced it is using incorrect
 8 data.
 9 "The problem has been fixed by ensuring that
 10 the final BTS uses the original data retrieved
 11 by the counter at step 2 rather than the data
 12 left over after step 4.
 13 "The problem was first reported by Warwick
 14 ..."
 15 So that's the issue we saw earlier that
 16 originally paused the rollout to further
 17 branches but that was quickly resumed:
 18 "... and they point out that the trial
 19 Balance figures were correct and the Final
 20 Balance figures were incorrect.
 21 "comparing the Trial and Final balance
 22 figures with the corresponding Stock Unit
 23 Balance Reports shows easily that the Trial
 24 Balance is correct and the final Balance is
 25 incorrect.
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1 but there's another report earlier on in the
 2 consequences that is right and that they want to
 3 place reliance on that earlier report rather
 4 than the final report?

5 A. Yes. But what it doesn't tell us here is, if
 6 that's the system report or just the printed
 7 version.

8 Q. Yes. Can we look at page 4, please, which is
 9 an email from Gareth Jenkins of 19 February to
 10 Phil Norton, copied to Alan D'Alvarez.
 11 As I said, they're laid out slightly
 12 strangely, but if we go over the page, that's
 13 the substance of that email. It says:
 14 "Alan D'Alvarez has asked me to respond to
 15 your concerns below. I'll try to explain the
 16 issue and what has caused it.
 17 "I assume you've seen the attached write-up
 18 of the issue which was sent to Barry Evans ...
 19 "To expand on this a bit further:
 20 "When the BTS is being produced, it is done
 21 based on data written to the Branch Database ...
 22 whenever a Stock Unit Rolls Over.
 23 "BTS Production retrieves this data from
 24 BRDB to the counter.
 25 "The counter then uses it to generate the
 182

1 "None of the incorrect data is stored to
 2 BRDB so there is no possibility of ongoing
 3 corruption of stock levels.
 4 "Does this clarify the situation for you?"
 5 So what do you understand the position to be
 6 in simple terms?

7 A. I understand it to be some sort of corruption
 8 between the trial balance and final balance that
 9 isn't actually corrupting the data but it is
 10 corrupting the way the data is being reported,
 11 such that the final balance hasn't got the
 12 correct data on it any more. But it's not
 13 actually impacting the balance as carried
 14 forward and, if that's the case and it's been
 15 validated as the case and that it doesn't
 16 invalidate the data going forward, then I guess
 17 that may have been acceptable. But, as I say,
 18 I don't remember the detail of the, you know,
 19 I'm assuming that -- well, that would have been
 20 tested and proven to be correct before we'd have
 21 made the decision to accept this.
 22 Phil would also have checked with his
 23 Finance colleagues in what was known as P&BA,
 24 pension and branch accounting, I think,
 25 something and branch accounting. To validate
 184

1 that they were comfortable there was no risk of
 2 corruption.
 3 **Q.** We'll see what happens. We can look at
 4 an email, another response from Gareth Jenkins.
 5 That's page 2. Just pausing therefore briefly,
 6 what was your relationship like with Gareth
 7 Jenkins?
 8 **A.** I didn't have a real relationship with Gareth,
 9 to be honest.
 10 **Q.** What did you know or understand his role to be?
 11 **A.** I couldn't recall what his role was at this
 12 time. I am guessing he was some sort of analyst
 13 within the Fujitsu team. That's why he's
 14 responding to Phil.
 15 **Q.** You raised earlier in the email chain the issue
 16 of this being a legal document. Did you have
 17 any discussions at any time with him about legal
 18 proceedings?
 19 **A.** No.
 20 **Q.** Were you aware of his involvement in legal
 21 proceedings at all relating to the Horizon
 22 System?
 23 **A.** No.
 24 **Q.** So this is the response from him. Now, this one
 25 is slightly difficult to understand and it may

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1 **A.** Was I put onto the distribution list for this
 2 one?
 3 **Q.** Well, you do appear in the chain later on, so
 4 you certainly did receive this within the chain.
 5 **A.** I mean, my view is that this would be looked at
 6 by Phil and by Will's team, so Will or Barry, to
 7 ascertain exactly what's going on and whether
 8 that's acceptable and they would determine its
 9 acceptability or not by consulting others, as
 10 I said, the head of P&BA, for example, to make
 11 sure there is no financial risk.
 12 **Q.** Can we just zoom out. You are in fact on this
 13 particular email. You're there, you're one of
 14 the copy recipients.
 15 **A.** Yeah.
 16 **Q.** So at the bottom there again, we move to Phil
 17 Norton's email, which says:
 18 "Given the legal status of these reports
 19 ..."
 20 This is the issue that you had previously
 21 raised --
 22 **A.** And I ask (unclear) on my original question.
 23 **Q.** Exactly:
 24 "... (they -- the final -- are often used in
 25 court proceedings when we are trying to recover

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1 need a bit of explaining from me. The indented
 2 parts of this are Phil Norton's email that
 3 Gareth Jenkins is responding to. So where he
 4 says, "Phil" and then it goes indented, actually
 5 the bit that is indented seems to be Phil
 6 Norton's comments and Gareth Jenkins is
 7 commenting below.

8 So Gareth Jenkins's words seem to be -- and
 9 if we look at the penultimate paragraph and
 10 final paragraph on that page, the bottom of that
 11 page, if we could highlight those entries, thank
 12 you -- he says:

13 "It is not practical to explain exactly
 14 which figures are wrong and which are correct on
 15 the Final Report. However it is restricted
 16 entirely to the Stock levels of Volume Stock
 17 (ie the second part of the BTS). From the
 18 examples we have seen it is likely to be many of
 19 the Stock levels are wrong) and the figures will
 20 be too high, so indicating that the Branch's
 21 Stock levels should be higher than they really
 22 ought to be."

23 Do you remember being satisfied by that kind
 24 of an explanation, that it's not practical to
 25 explain exactly which figures are wrong?

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1 monies from dismissed subpostmasters) and the
 2 potential 'integrity' challenges that could be
 3 levelled against the HNG system as a result of
 4 any differences; POL need assurance from Fujitsu
 5 that they could/will explain the cause of the
 6 problem and prove the system has integrity
 7 should we be challenged."

8 Gareth Jenkins' response on that is:

9 "I understand this, though I would have
 10 [I think that must have been 'thought'] most
 11 legal proceedings would be based on the first
 12 part of the report (which covers cash levels)
 13 rather than the second part."

14 Then we have, again, Phil Norton's email:

15 "I know this is not your area, however in
 16 order to help us get concurrence from our
 17 Finance Team we do need the commitment. I know
 18 Mark has asked Chris for that assurance ..."

19 Is that "Mark" yourself?

20 **A.** Probably. I don't know for sure.

21 **Q.** "... however dependent upon the outcome of the
 22 meeting schedule with POL Finance on Monday we
 23 may need to request more specific assurances."

24 Gareth Jenkins' response is:

25 "I'll leave others to respond to that."

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1 There's another point that he's responding
2 to, from Phil Norton, which said:

3 "Would you please advise who within FS
4 [that's Fujitsu] would be in a position to
5 provide the assurances/agree to any such
6 request."

7 Gareth Jenkins again says that he would
8 leave that to others.

9 Can we look at page 1 of that email chain,
10 please. This is followed up by an email from
11 Phil Norton to Alan D'Alvarez -- thank you very
12 much.

13 You're copied in to that, and he says:

14 "Alan

15 "Further to the correspondence detailed
16 below -- I have now met with our finance team to
17 discuss this issue and to establish their
18 position regards any requirements that they have
19 to ensure POL does not incur additional expose
20 [I think that must mean 'exposure'] as a result
21 of this defect.

22 "As previously stated the Final Balance
23 Report is a legal document and as such POL rely
24 on the accuracy and integrity of the report
25 during any legal action we undertake to recover

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1 minimised, however I do need Fujitsu's agreement
2 to the above to gain the support of our Finance
3 teams."

4 Was the fact that the final balance that was
5 produced by Horizon Online at this stage, that
6 it was inaccurate, was that a serious issue for
7 the Post Office?

8 **A.** Absolutely. I think, as you can see, you know,
9 from the investigation that was done of it.

10 **Q.** The workaround that had been suggested that the
11 final balance was simply discarded, was that
12 appropriate? Was that considered appropriate by
13 the Post Office?

14 **A.** Well, based on the above comments, no, and
15 that's why I asked with Phil to check with P&BA
16 because they're the owners of the financial
17 integrity.

18 **Q.** Do you think that Fujitsu were taking the legal
19 implications of this seriously enough?

20 **A.** I'd like to think so. I mean, you know, in my
21 discussions with them, I never had any reason to
22 doubt that, you know. So I'd like to think they
23 were taking that seriously. But without seeing
24 how they responded to this, you know, it would
25 be interesting to see what their response was.

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1 monies from the Subpostmasters. Given the Trial
2 report can be planted several times -- usually
3 following stock adjustments made during the
4 balancing process, this has no standing from
5 a legal perspective.

6 "Based on this, and the understanding of the
7 defect, how it arose, and the proposed
8 rectification (as provided by Gareth); our
9 Finance team require certain specific
10 deliverables from Fujitsu in order for them to
11 be able to manage the risk this poses and to
12 give them the confidence to support the
13 continued rollout of HNG.

14 "The deliverables required [include]"

15 They want a list of all products where the
16 volumes on the final balance differ and they
17 want a definitive statement explaining how it
18 has happened, et cetera.

19 They also want a commitment to support POL
20 improving the integrity of the system, that's
21 number 5. Over the page:

22 "POL Legal to 'sign off' the Fujitsu
23 Definitive Statement as fit for purpose.

24 "There are several internal processes that
25 will be implemented to ensure any impact is

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1 But, certainly in my discussions with Alan, he
2 would always, you know, absolutely support what
3 we were trying to do to make sure this was
4 really of good quality.

5 **Q.** It's quite significant, of course, that
6 a document that might be used in legal
7 proceedings is inaccurate in showing the final
8 balance. How far up within the Post Office do
9 you think this issue was raised?

10 **A.** I honestly can't -- cannot tell you. It doesn't
11 have to be raised anywhere, unless we were put
12 under pressure from Fujitsu to accept their
13 workaround. You know, from everything I've read
14 so far, we did absolutely the right thing.

15 Asked Phil to look into it with P&BA, as I say,
16 who owned the financial integrity. They've
17 given us a very clear statement that they need
18 to understand and to be able to have absolutely
19 definitive proof that the integrity of the data
20 is not compromised in any way and also ensure
21 our legal team to sign off to that effect.

22 You know, so really important to us and
23 them, you know, that this is, you know,
24 absolutely integrity is at the heart of it.

25 **Q.** The workaround is not relying on the final

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1 report and having some sort of side assurance
2 that everything is okay. Given that people were
3 prosecuted by the Post Office, do you think that
4 that was sufficient?

5 **A.** Well, sorry, I don't believe we went live with
6 this workaround.

7 **Q.** But do you think that attitude of reliance on
8 a side statement, rather than fixing the problem
9 then and there, was sufficient?

10 **A.** I think that's an unfair question, to be
11 brutally honest. I think Fujitsu were proposing
12 a potential workaround. At no point are they
13 saying this workaround has to be accepted. They
14 were proposing what they deemed a potential
15 workaround. Clearly, it set alarm bells in my
16 head when I saw it, hence I asked who'd agreed
17 to it, and asked Phil to look into it.

18 And, you know, I don't see anything on here
19 that's, you know -- there's a little bit where,
20 you know, he's trying to explain why he thinks
21 it's okay but, clearly, doesn't have the full
22 understanding of the significance of the final
23 balance statement in any potential legal
24 proceedings.

25 So I don't see any pressure from them, you
193

1 message somehow would be linked?

2 **A.** No, no, my -- can you put my words back on the
3 screen, please?

4 **Q.** Yes, it's the same document, and it is page 9.

5 **A.** My words don't say that. My words say, first of
6 all, who has it been agreed with? This is
7 a legal document so instantly registering my
8 concern about it and there's a difference
9 between a trial and a final, you know, if we
10 were to go ahead with anything like this, you
11 know, we would expect -- if CS is customer
12 service, I don't know -- but certainly a Known
13 Error Log, if it was agreed. And, as I said,
14 I don't know -- my first question is: who has
15 agreed to it? And then, as you see, I asked
16 Phil to determine if it's acceptable and that's
17 what leads to all the investigation that says
18 it's not acceptable.

19 So you wouldn't have a Known Error Log for
20 something that we're not accepting because,
21 actually, we'd be asking Fujitsu to fix it.

22 **Q.** It's the attitude that I'd like to drill down
23 on, really, because we're talking about very
24 early days of Horizon Online here, and there is
25 a problem with the balance, the final balance,

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1 know. Clearly, in hindsight, it wasn't a good
2 proposal and, as such, I believe it was rejected
3 on this basis.

4 **Q.** Given the significance of Post Office's ability
5 to prosecute people, based on information
6 provided to a court in arising from a printout
7 from the Horizon System, do you think that
8 an approach that looks for workarounds is the
9 right approach or do you think, for example,
10 that should have caused the Post Office to take
11 a deep look at the system?

12 **A.** As I said to you, it set alarm bells in my head.
13 A deep look at the system, this is one issue
14 that arose that absolutely we were trying to do
15 the right thing to make sure it was resolved.

16 **Q.** How would this information be cascaded down to
17 individual branches?

18 **A.** Well, it wouldn't be because, as I said, unless
19 you're going to tell me we went live with it,
20 which I don't believe we did, and I'll be
21 surprised if we did, you know, why would we
22 cascade it, because we'd expect it to be fixed.

23 **Q.** Your suggestion, though, was to make sure it was
24 on the Known Error Log, so that any
25 subpostmasters who phoned in would -- the
194

1 and what you're saying there is that you would
2 expect there to be a Known Error Log, if it was
3 agreed, so that subpostmasters -- any
4 subpostmaster who calls in would -- the two
5 would be linked. But what about all those
6 subpostmasters who don't call in?

7 **A.** Sorry, you know, it's not about being able to
8 explain it; it's about being absolutely 100 per
9 cent certain it's got integrity and that's what
10 I said at the beginning. It's absolutely
11 critical that the system had integrity and we
12 could support that integrity. And, hence,
13 I asked Phil to look at that. And there's no
14 way we would have proceeded without the system
15 having integrity.

16 **Q.** But where there were problems in the system,
17 known problems, was the attitude to have a Known
18 Error Log for the problem to be able to explain
19 the position to any subpostmaster who calls in?
20 Was that a common response to problems that, put
21 it on the error log and all will be okay?

22 **A.** No, I think that is really not a fair reflection
23 at all. A Known Error Log is more for things
24 that are genuine workarounds that have no real
25 impact. It's almost back to my font example.

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1 You know, it's things that do not impact the
2 subpostmaster, do not impact a counter clerk, do
3 not impact, you know, any of our clients at the
4 time.

5 They're just things that, you know, are,
6 shall we say not quite, you know, as we expect
7 them to be, but aren't causing any financial or
8 other material impact or questioning of
9 integrity, and we wouldn't proceed with it. We
10 wouldn't have something on the Known Error Log
11 for something that is an integrity question.

12 **Q.** So if the Known Error Log did have things that
13 were more significant than just the font issue,
14 that affected the real lives of subpostmasters,
15 would that have been poor practice and
16 unexpected by yourself?

17 **A.** I mean -- sorry, font example is a very, very
18 simplistic example. A Known Error Log will
19 contain certain scenarios, you know, and they're
20 generally what are classed as low-level issues
21 that will be fixed over time. But they
22 shouldn't have any impact on the integrity of
23 the system. If they have impact on the
24 integrity of the system, I will be surprised, if
25 they're on the Known Error Log.

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1 to the Acceptance Board Recommendation 3:
2 'Proceed at risk through Acceptance Gateway'.

3 "These associated conditions were discussed
4 at the corresponding release authorisation board
5 and recorded in the minutes of that meeting."

6 Do you recall in terms of the acceptance of
7 Horizon Online that it was effectively "proceed
8 at risk", as in there still were some concerns
9 but the agreement was to proceed despite some
10 concerns?

11 **A.** But the concerns are not to do with anything
12 that is high severity and therefore not
13 an integrity question. It is clearly called out
14 there but yet a number could combine to form
15 a high severity, if whatever the fix was, didn't
16 actually complete successfully, and therefore we
17 would end up pausing again if that was the
18 situation.

19 **Q.** Can we look at page 9 of this document. It may
20 be at the bottom of page 8. The bottom of this
21 page says:

22 "It should be noted that there are also
23 defects that are not linked to POL Requirements
24 and which are not the subject of an Acceptance
25 Incidents. A separate assessment of the status

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1 **Q.** Can we look at POL00032999, please. This is the
2 same period, so we're looking here at
3 23 February 2010. This is the acceptance report
4 for HNG-X. Can we look at page 12 -- just to
5 look, the external distribution, you're on the
6 list there as having received this document.

7 Can we look at page 12 and it's
8 paragraph 1.3 that I'd like to look at.

9 It may be slightly earlier than that. It
10 may be the page before. Thank you very much.
11 "Acceptance Decision", could we highlight the
12 "Acceptance Decision"? I'm just going to read
13 that. It says:

14 "The AG3 Acceptance Board ... was held on
15 21/01/10 and approval to proceed through AG3 was
16 granted. The decision stated that '... it was
17 agreed that the high priority figures in
18 "Reset 4" -- to be delivered as part of the
19 Maintenance Release 01.08 -- could constitute
20 High Severity AI if not delivered in time for
21 High Volume Pilot ...' As such, 'Qualified
22 Acceptance' at AG3 was agreed, subject to the
23 successful delivery of the high priority items
24 in Reset 04.

25 "Whilst not an exact match, this the closest
198

1 and significance of these has been undertaken
2 and this will be available for consideration at
3 the Release Authorisation Board."

4 Are you able to assist us with that at all,
5 that there were defects that weren't linked to
6 POL requirements?

7 **A.** Not specifically. I cannot think what would be
8 a defect that wouldn't be specifically covered,
9 you know, other than going to back to my font
10 example, which probably wasn't a specific
11 requirement. But other than things like that,
12 you know, I'd have to see some examples to
13 recall that.

14 **Q.** Can we look at FUJ00094265. This document, when
15 it comes up, goes back to the issue we were
16 talking about a moment ago. This is an internal
17 Fujitsu document and it has the recipient there
18 was the general council at Fujitsu, and it says
19 that the issue has been flagged as critical to
20 fix before the start of rollout. This is the
21 branch trading statement issue that we talked
22 about a moment ago.

23 There's a draft email there from Geoff
24 Butts, it's a draft response to the Post Office,
25 so it's essentially responding to that request

200

1 for assurance, and it's a draft of that. If we
2 could scroll down.

3 It's drafted to Phil, and it says -- for
4 example the problem description, it says:

5 "On the final report, the stockholding
6 figures in the second section of the report are
7 incorrect on the final balance."

8 So that's the problem we've already talked,
9 about and it provides the reassurance that is
10 asked for. If we look over the page, it has
11 "Key questions" and answers:

12 "Can Fujitsu provide a complete and
13 comprehensive list of all products where the
14 volumes on the final balance report differ from
15 those on the trial balance report? All figures
16 relating to the volume stock holdings can be
17 corrupted by the bug but not necessarily all the
18 figures will be incorrect."

19 If we go down:

20 "How has the defect arisen?"

21 It's a software issue.

22 "What is Fujitsu doing to resolve the
23 defect?"

24 "Fujitsu has developed a software fix that
25 resolves the issue by ensuring that the final
201

1 made to Fujitsu. Is your evidence that it
2 wasn't agreed or that you don't recall it was
3 agreed, or something else?

4 **A.** Well, all I know is the previous email from Phil
5 said it wouldn't be agreed without all these
6 caveats being put in place. I've yet to see all
7 those caveats being answered in this draft
8 email.

9 **Q.** Well, let's look at the final entry. It says:

10 "Can Fujitsu provide a commitment to support
11 POL in proving the integrity of the system in
12 any subsequent legal action (specifically where
13 the difference in the two reports is used as
14 a means to challenge the integrity of the
15 system?"

16 "Yes, Fujitsu is willing to provide
17 commitment to prove the integrity of the system
18 in any subsequent legal action."

19 Is that something that you recall ever
20 happening?

21 **A.** I don't recall it ever happening. I think the
22 one above as well is interesting as well and
23 important. Please don't lose that one.

24 **Q.** Absolutely. So it says:

25 "Can Fujitsu provide a statement proving in
203

1 report uses the original data retrieved by the
2 counter at step 2 described above rather than
3 using the data left after step 4. This is
4 a counter fix that is currently scheduled to be
5 delivered within the next maintenance release
6 for HNG-X -- 01.08. In the short-term, before
7 the fix is deployed into live, Fujitsu has
8 written a KEL which includes instructions to the
9 HSD to give advice to Postmasters. The advice
10 is to use the Trial Report, which is correct,
11 and to discard the Final Report."

12 This is something again, we were talking
13 about earlier and it was your suggestion in your
14 email that it certainly needed, if accepted, to
15 go on to the Known Error Log, and the workaround
16 there seems to be to rely on that earlier
17 statement and not the final report. So you rely
18 on the trial report not the final report.

19 **A.** Yes.

20 **Q.** So it certainly seems from this that that was
21 the position and that was agreed at that time.

22 **A.** Where is it saying it was agreed? I think
23 this --

24 **Q.** Well, this is -- certainly, the intention here
25 seems to be to respond to the request that was
202

1 the integrity of the data is not compromised in
2 any way and the only impact is incorrectly
3 reported data?

4 "Fujitsu confirms that this defect relates
5 specifically to the printing of report data and
6 is not related in any way to the underlying
7 branch data held in the operational HNG-X
8 system."

9 **A.** If you recall at the start of this section
10 I talked about is it just the printout that's
11 reporting it incorrectly or is it the system.

12 **Q.** Yes.

13 **A.** By that, it sounds like it's just the printout
14 not the actual system. But, as I said, we still
15 need to go on but I still haven't seen, you
16 know -- yes, they've said they're willing to
17 provide a legal assurance to the -- to the
18 integrity and, you know, there's still more
19 missing for me, you know, because this would go
20 to Phil, Phil would, you know, take it to the
21 Finance team and also to the -- our internal
22 lawyers for advice.

23 **Q.** If this had been accepted as the means to get
24 around the issue, do you think it would be a bit
25 shoddy or would it be satisfactory to provide
204

1 this kind of workaround where you rely on
2 a trial report not a final report and then you
3 have Fujitsu provide a statement in criminal or
4 civil proceedings saying that everything is
5 fine?

6 **A.** I think, if it is just the printout that is
7 correct and Fujitsu have proven and demonstrated
8 that, and the integrity of the system has been
9 absolutely proven to be 100 per cent, then
10 I think it is reasonable. It's not ideal, but
11 it is reasonable. But, as I said, it's proving
12 that it is only the printout. It's proving
13 that, you know, the system does maintain a full
14 integrity.

15 **Q.** Would the attitude of the Post Office be that
16 they had to rely on Fujitsu in those
17 circumstances to guarantee those kinds of
18 assurances that you've just talked about?

19 **A.** No, I think you'll recall on Phil's email he
20 wanted assurance from our Finance team and from
21 our lawyers.

22 **Q.** Yes, but who would be able to prove the
23 integrity of the system? Were you reliant on
24 Fujitsu or would that be a joint effort?

25 **A.** We would run various tests to prove, you know,
205

1 a week, maybe once a fortnight. A "hot fix" is
2 where they'd put a fix in between that because
3 we'd deemed it urgent.

4 **Q.** "GB will also prepare a statement that confirms
5 the legality/integrity of the trial balance
6 report if that needs to be used."

7 So that's the draft of which we saw earlier
8 or document relating to that we saw earlier.
9 Can we scroll up again, so we can look at the
10 next entry, it says:

11 "25 February. POL have requested that this
12 be a hot fix as it is required before we migrate
13 any further branches. Fujitsu to ensure
14 deliverables listed in PN email dated
15 24 February for current five branches are
16 included.

17 "4 March. GB has received feedback on
18 integrity statement from Fujitsu legal. Info
19 will be forwarded to PN.

20 "11 March, PN has passed statement to P&BA
21 ..."

22 You were talking to about P&BA earlier,
23 weren't you. Can you remind us what they were?

24 **A.** I can't remember what the "P" stands for,
25 I think it was pensions and business accounting
207

1 and produce examples whereby the report was
2 incorrect but we'd proved the data -- underlying
3 system data was still -- had the integrity.

4 **Q.** We've seen certainly at the Fujitsu end that
5 this has gone to the General Counsel. Do you
6 recall how high up this particular issue went
7 within the Post Office?

8 **A.** I don't recall, no.

9 **Q.** Can we go to FUJ00094472. This is the "Notes
10 from the Horizon Next Generation Joint Progress
11 Meeting" of 11 March 2010. Can we look at the
12 bottom of page 3 into page 4, please. Thank
13 you, the bottom of that page. "PN" is Phil
14 Norton?

15 **A.** Yes.

16 **Q.** It says there:

17 "Trial report final balance issue
18 "PN to check if the proposed workaround is
19 acceptable to the business. Permanent fix
20 targeted for R1.08. However, this is dependent
21 on the acceptability of the workaround. It may
22 need to be a hot fix."

23 What was a "hot fix"?

24 **A.** So Fujitsu would do releases, I can't remember
25 how often they would do a release, maybe once
206

1 or -- I can't remember what the "P" stands for.
2 It's basically the central Finance team who look
3 after the cash accounting data and reconciling
4 with the clients, et cetera.

5 **Q.** "... who are reviewing with POL legal team. PN
6 will feed back to GB."

7 Do you recall at all how this issue ended?

8 **A.** I don't recall how the issue ended, no, and if
9 you note, I wasn't at this particular meeting.

10 **Q.** Had you moved into a different position by then
11 or were you just no longer involved in that
12 particular issue?

13 **A.** No, at the top I've given my apologies. I was
14 actually on holiday at this point.

15 **Q.** Thank you. Can we look at FUJ00094471. This is
16 a Post Office highlight report, 17 March 2010.
17 It has your name at the top there. It's the
18 third paragraph down, it says:

19 "Fujitsu are now providing evidence to POL
20 which indicates an improvement in stability and
21 therefore the pilot has been scheduled to
22 restart this week, as agreed by the POL internal
23 Release Authorisation Board on 17 March."

24 Then it goes on to talk about high volume of
25 calls to the helpdesk. It says:
208

1 "The average number of calls per Horizon
2 Online branch remains significantly higher than
3 that of the Horizon branches and the concern
4 remains that the HSD will fail to cope with
5 a significant increase in migrated branches."

6 If we look down, an entry that relates to
7 quality. This is all six days later, and it
8 seems as though the pilot is restarting and
9 these are the issues that are still occurring.
10 Screen freezes and -- it says the rate of screen
11 freezes and recoveries has been greater than
12 expected. "User opinion", it then says, "The
13 number of calls", as I just explained, to the
14 HSD:

15 "... the rate of calls from Horizon Online
16 branches is significantly higher from Horizon
17 branches."

18 You're not aware whether the branch report
19 issue had been resolved by this stage?

20 A. I'd have thought it would have been, if it isn't
21 mentioned explicitly.

22 Q. But there were still at that stage other issues,
23 despite the pilot having resumed?

24 A. Well, and that's what makes me infer that it was
25 resolved. But, again, I wouldn't have been

209

1 to Horizon Online.

2 We have there number 1:

3 "Receipts and payments mismatch bug

4 "This is a bug present in Horizon Online.

5 The bug occurred in 2010. The majority of
6 incidents are recorded as occurring between
7 August and October 2010."

8 Number 3:

9 "Suspense account bug

10 "This is a bug present in Horizon Online.

11 Its identified years of effect are 2010 to 2013.

12 Number 4:

13 "Dan Wellington(?) ** Bug/branch outreach

14 issue. This is a bug present in Horizon Online.

15 It's effects were experienced between 2010 and
16 2015.

17 Number 5:

18 "Remming in bug. This is a bug present in

19 Horizon Online. It was present for about five

20 months in 2010 between March and August."

21 Number 7:

22 "Local suspense account issue. Not the same

23 as 3, suspense account bug. This is a bug

24 present in Horizon Online. This was reported in

25 2010 and recorded as fixed in September 2010."

211

1 around at this time because I know by the dates
2 I was away.

3 Q. Looking back at all the things we've been
4 looking at, do you think that HNG-X, Horizon
5 Online, was rolled out too soon?

6 A. No. I regard we did the appropriate testing.
7 We did validate the integrity fully before we
8 migrated. We stopped in the event of any
9 suggestion there was any issue that impacted the
10 integrity or anything else that couldn't be
11 explained, you know. As I said, I personally
12 brought in the NFSP, National Federation of
13 SubPostmasters, to form part of our -- (a) we
14 bought them in to the testing so they could
15 actual get directly involved in the testing but
16 also part of our release authorisation process,
17 and they were party to every decision to
18 proceed.

19 Q. Can we look at POL00022842, please. This is
20 appendix 2 to the judgment of Mr Justice Fraser
21 and it lists or summarises bugs, errors and
22 defects in Horizon. Can we go to the second
23 page of that and there's the summary of bugs,
24 errors and defects. I'm just going to take you
25 through the bugs, errors or defects that relate

210

1 Number 8:

2 "Recovery issues. These are bugs, errors
3 and defects present in Horizon Online with years
4 of effect from 2010 to 2018."

5 Over the page, number 13:

6 "Withdrawn stock discrepancies. This is
7 a bug present in Horizon Online mentioned in
8 2010 and 2011."

9 Number 14:

10 "Bureau discrepancies. This is a bug
11 present in Horizon Online. It arose in 2017."

12 Down to number 19:

13 "Post & Go/TA discrepancies in POL SAP.

14 This is a bug present in Horizon Online.

15 Occurred in 2012.

16 "Recovery failures. This arises in Horizon
17 Online. This is referable to Horizon issue 4
18 and not Horizon issue 1. Two of the PEAKs show
19 errors and defects, they do not show bugs.
20 Mentioned in 2010, 2012 and 2015.

21 Over the page to number 23, please:

22 "Bureau de Change. This is a bug present in
23 both Legacy Horizon and Horizon Online. Arose
24 in 2005, 2006 and 2010 onwards."

25 25:

212

1 "Lyca top-up bug. This is bug present in
2 Horizon Online. Occurred in August 2010."
3 Number 28:

4 "Drop and go. This is a bug present in
5 Horizon Online, occurred in July 2017. The date
6 of the KEL suggests HNG-A but the KEL is
7 expressly headed HNG-X."

8 You were asked to specifically address
9 a list of bugs in you statement but you didn't
10 address these bugs. Is there a reason why you
11 didn't address these bugs in your statement?

12 **A.** I didn't know I was expected to address these
13 bugs in my statement but all I would say is
14 there's far too little information on these for
15 me to make a comment on them. It doesn't tell
16 me what the actual bug is, it just says there's
17 a bug present. For example, Lyca top-up, it
18 just says there's a bug present in Horizon
19 Online. It doesn't tell me what the nature of
20 that bug is, and, you know, whether it was, you
21 know, if you recall back, one of the things
22 I said to you was, you know, you don't develop
23 a system, deploy it and that's it. You're
24 constantly making improvements to that system,
25 be that new products, be that changes in how we
213

1 NFSP. Ultimately their support was a vital part
2 of our rollout."

3 I mean, it was a bit more than some noise,
4 wasn't there, in terms of the number of bugs
5 that I've just taken you to, the implications of
6 it all? Do you think, again, you've minimised
7 the issues in your statement?

8 **A.** Sorry, let me explain to you how I've answered
9 this question. The documents I received were
10 several thousand pages, and as I said to you,
11 you know, none of those -- some of those bugs
12 were well after Horizon HNG-X was rolled out.
13 Some of those, you know -- and therefore
14 presumably introduced by a subsequent release.
15 None of those bugs have enough detail for me to
16 comment on, and I'd be commenting from, you
17 know, a guesswork, and that's totally the wrong
18 thing to do, you know.

19 I've never said there weren't bugs in the
20 system. As I said, of course there was noise.
21 We managed it very closely with the -- as
22 I said, we involved the Federation of
23 subpostmasters in all our decisions. We worked
24 with them. You know, they were very much part
25 of the team that agreed, you know, in terms of
215

1 operate products, et cetera.

2 And, therefore, there's always a risk that
3 bugs do creep in and that's why you have to, you
4 know, keep testing it and, you know, keep on top
5 of it. But on none of these have I got
6 sufficient information to be able to comment on
7 them, I'm afraid.

8 **Q.** Do I take it from that that you didn't follow
9 any of the court proceedings relating to
10 Horizon?

11 **A.** Well, I followed bits of it but, you know,
12 I didn't follow in detail, you know. I looked
13 on from afar and --

14 **Q.** You were given a specific list in your Rule 9
15 Request that identified bugs and asked to
16 comment on them, and can we take you to your
17 response. It's WITN03850100, that's your
18 statement, and take you to paragraph 19, page 5.
19 You said there:

20 "I had confidence in HNG-X throughout, in
21 terms of the development and testing process,
22 but we were deploying a system to over 10,000
23 branches and some bugs had been identified, and
24 whilst they were fixed naturally there was some
25 noise as we were very open and honest with the
214

1 any known errors, would we go live with them?
2 Absolutely. They were part and parcel.

3 **Q.** Are you still there?

4 **A.** Yes, I'm still here.

5 **Q.** Thank you. Is your evidence that after rollout
6 there weren't significant bugs that were drawn
7 to your attention that addressed issues that
8 affected the cash account and affected the lives
9 of subpostmasters?

10 **A.** No, I can truthfully say that from the point we
11 rolled out HNG-X/Horizon Online, that I wasn't
12 aware of any bugs that impacted the integrity of
13 the system. I wasn't aware of them. I'm being
14 very specific.

15 **Q.** They weren't drawn to your attention by anybody?

16 **A.** Well, no, and in part probably because I'd left
17 the Post Office by then.

18 **Q.** Well, let's say the rollout of Horizon Online
19 was 2010. After 2010 did anybody draw to your
20 attention significant errors or bugs with
21 Horizon Online that affected the cash accounts
22 of subpostmasters?

23 **A.** Not to my knowledge, no. I'm not saying it
24 didn't happen, but not to my knowledge, no.

25 **Q.** Can we look at POL00029618, please. It's
216

1 page 2.

2 This is an email from Ron Warmington of
3 Second Sight to Simon Baker. Do you know who
4 either Ron Warmington or Simon Baker are?

5 **A.** I've no idea who Ron is. I think Simon -- I
6 don't know what his role was. He joined the
7 Post Office before I left, but I don't know what
8 his role was at this time.

9 **Q.** Were you aware of an investigation being carried
10 out by Second Sight into issues with Horizon?

11 **A.** I broadly recall it, but I thought it was, you
12 know, with Legacy Horizon.

13 **Q.** We have here an email from Ron Warmington that
14 says:

15 "Simon, this is a draft section of the
16 report dealing with two defects."

17 And he asked two questions. He wants to
18 know how there were shortages, or how the
19 shortages or surpluses that arose from certain
20 problems were impacting on subpostmasters, and
21 he also wants to know when and how and who knew
22 about those problems. I'll take you to the
23 extract from the interim report. If you scroll
24 down, he has sent Simon Baker an extract from
25 his report to assist him. It says:

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1 Simon Baker says -- he's sending this on, and he
2 says:

3 "Just got this from Ron."

4 Sorry, it's further down. It's the bottom.

5 "Just got this from Ron."

6 "I can get back to him on most of the
7 questions but need your help on who in Post
8 Office knew about it. I know from the email
9 that Rod sent that Mike Young knew, but don't
10 know if it went any higher."

11 This is to Lesley Sewell. Do you know who
12 Lesley Sewell was?

13 **A.** Lesley Sewell was the new head of IT that was
14 brought in shortly before I left.

15 **Q.** Can we go to the top, email from Lesley Sewell.
16 She responds, 25 June 2013:

17 "Simon, I don't know if it went any higher
18 than Mike. Andy Mc ..."

19 Who is "Andy Mc"?

20 **A.** Andy Mc -- it was the Head of Service
21 Management. I can't remember his surname.

22 **Q.** "I don't know if this went any higher than Mike.
23 Andy Mc also managed the service at the time,
24 and if I remember correctly, Mark Burley was
25 also involved."

219

1 "POL has recently disclosed to Second Sight
2 that in 2011 and 2012 it had discovered defects
3 in Horizon Online that impacted 77 sub post
4 offices. The first defect, referred to as the
5 'Receipts and Payments Mismatch Problem',
6 impacted 63 branches. It was discovered in
7 September 2010 as a result of Fujitsu's
8 monitoring of the system events (although there
9 were subsequent calls from branches). The
10 aggregate of the discrepancies arising from this
11 system defect was £9,029, the largest shortfall
12 being £777 and the largest surplus £7,044. It
13 is not yet clear whether subpostmasters with the
14 surpluses profited from them, or whether those
15 showing shortages had to make them good.

16 "The second defect, referred to as the
17 'Local Suspense Account Problem', affected 14
18 branches and generated discrepancies aggregating
19 to £4,486, including a shortfall of 9,800 at one
20 branch and a surplus of 3,200 at another. POL
21 was unaware of this defect until a year after
22 its first occurrence in 2011."

23 So it's referring to issues in 2011 and 2012
24 that affect the cash account of subpostmasters.

25 If we go on to the page before, page 1.,

218

1 Now is Lesley Sewell wrong to say that you
2 were involved?

3 **A.** Involved in what?

4 **Q.** Well, he is asking who in Post Office knew about
5 these problems.

6 **A.** So I think the one on receipts not equal
7 payments we've discussed and, you know, I didn't
8 believe that was found when we were actually
9 live. I thought that was found before we were
10 live. But from the below, it might have been
11 when we were live. But, you know, the suspense
12 one doesn't ring any bells with me at all, and
13 certainly I wasn't informed of the 2011 one.

14 **Q.** Did Lesley Sewell ever raise, following receipt
15 of this email with you, any questions that
16 Second Sight had raised, or --

17 **A.** No.

18 **Q.** -- or any issues concerning Second Sight's
19 report?

20 **A.** Nobody from the Post Office contacted me with
21 anything to do with the system after I left.

22 **Q.** So you think the extent of your involvement was
23 the involvement in the local -- was it the
24 receipts and payments mismatch, or the suspense
25 account issue?

220

1 A. Sorry, say the question again?
 2 Q. The extent of your involvement in the underlying
 3 bugs, errors or defects, you're saying that it
 4 was the first, which is the receipts and
 5 payments mismatch, or the second, which is the
 6 local suspense account problem?
 7 A. No, I'm saying I remember the receipts not equal
 8 payments issue. And we did discuss that
 9 earlier. I don't --
 10 Q. I think we looked at that earlier in relation to
 11 Legacy Horizon rather than Horizon Online,
 12 although I may be wrong on that.
 13 A. Yeah, and that's what I think I'm getting
 14 confused now, because I don't recall it.
 15 I definitely recall it on original Horizon, but
 16 all I can say is, you know, obviously there were
 17 defects during the development of HNG-X. If we
 18 found defects that had any chance of impacting
 19 the integrity, we would make absolutely certain
 20 they would be fixed. And if that involved
 21 pausing, if that involved delay, that's what we
 22 would do.
 23 Q. Why do you think Lesley Sewell has mentioned you
 24 in connection with these particular defects,
 25 what are described at that time as "defects"?

221

1 was issued, et cetera?"
 2 Simon Baker emails Lesley Sewell to say:
 3 "I can get back to him on most of the
 4 questions but need your help on who in Post
 5 Office knew about it."
 6 Then Lesley Sewell's response is:
 7 "I don't know if it went higher than Mike.
 8 Andy Mc also managed the service at the time and
 9 if I remember correctly, Mark Burley was also
 10 involved."
 11 Is that recollection of Lesley Sewell wrong?
 12 A. Well, I think one, it's saying Lesley clearly
 13 knew about it, reading this. And just saying
 14 "If I remember correctly." All I'm saying is my
 15 recollection is I wasn't aware of those two
 16 specifics. But as I've said, it's my
 17 recollection, you know, at this stage, which is
 18 12 years since I left.
 19 Q. Would you not have remembered such significant
 20 impact on the cash account, given how
 21 significant you have said, in your evidence
 22 today, that it was to the very system that you
 23 were managing?
 24 A. I don't remember a specific instance, not
 25 necessarily. Would I remember if anything was

223

1 A. I don't think she's saying that in connection
 2 with the defects. I think she's saying because
 3 I was programme manager when she first joined.
 4 Q. And what would that mean? The question that's
 5 been asked here by Second Sight is ... I can
 6 tell you, but it's asking who knew what when,
 7 effectively. And you're being -- it seems to be
 8 that you're being suggested as somebody who was
 9 involved.
 10 A. Yeah, but as I'm saying to you, I don't recall
 11 being involved. As I say, the receipts and
 12 payments is an interesting one because I was
 13 clearly getting confused with the original
 14 Horizon. But, you know, as I say, during my
 15 time as programme manager, during my time as
 16 Head of Delivery, if any defects had come to my
 17 attention that would remotely put at risk the
 18 integrity of the system, I would have raised it
 19 and insist it was fixed. There was absolutely
 20 no question in my head whatsoever about that.
 21 Q. The question in Ron Warmington's email is:
 22 "Can you please let me know whether, when,
 23 and who at board level was informed of the
 24 defect, and also the later local suspense
 25 account defect, and whether any press release

222

1 raised regarding the risk to the integrity of
 2 the cash account, then one hundred per cent
 3 I would have insisted it was dealt with. But if
 4 you ask me do I remember every single incident
 5 that was raised that was connected to the cash
 6 account? No, I don't.
 7 Q. And do you think that Lesley Sewell was wrong in
 8 naming you there?
 9 A. I think that's a question you have to ask
 10 Lesley, why she named me. I don't know why she
 11 named me.
 12 Q. But do you think it was wrong for her to name
 13 you, given your level of involvement, or might
 14 it actually have been right?
 15 A. She's saying "If remember correctly." My view
 16 is she wasn't remembering correctly, because
 17 I don't recall those two specifics, especially,
 18 as I said, at that date. But I can't be a
 19 hundred per cent certain, as I'm saying.
 20 Q. I'm going to move on very briefly, before we
 21 finish, to a couple of other matters. Can we
 22 look at POL00055100. This question relates to
 23 your involvement in matters relating to criminal
 24 proceedings.

This is an email exchange of July 2010, so

224

1 we're going back in time now. And rollout of
2 Horizon Online hadn't been completed by this
3 stage, I don't think.

4 It concerns a disclosure request that was
5 made by solicitors for somebody who was being
6 prosecuted, Seema Misra. She was a defendant in
7 criminal proceedings that related to an incident
8 in 2008.

9 **A.** I vaguely remember her name, yes. I do. From
10 the news. Not from this.

11 **Q.** So Merlin Benjamin, on behalf of Jarnail
12 Singh -- do you remember Jarnail Singh at all?

13 **A.** No.

14 **Q.** That's the bottom email. In fact it's Jarnail
15 Singh who is sending the email. You can see
16 over the next page. But if we highlight that
17 bottom entry, it says:

18 "I enclose a copy of an email received from
19 Issy Hogg, the defence solicitors, on
20 22 July 2010, the content of which is
21 self-explanatory. Could you please be kind
22 enough to let me have your urgent instructions
23 as to the access and information she is
24 requesting in respect of the system in the
25 Midlands and the operation at Chesterfield and
225

1 "I'm awaiting comments from Penny/Gareth at
2 Fujitsu but the general consensus of opinion is
3 that these points are too vague and more
4 information is required exactly from the defence
5 as to exactly what they require. Our guidance
6 is required as per the email from Andrew Winn
7 below in relation to ..."

8 Ah, sorry. If we scroll down, sorry,
9 there's a key passage I missed off there which
10 is the email from Andrew Winn to Jon Longman
11 which says:

12 "I think Mark Burley would be the route into
13 IT to identify who might be best placed to deal
14 with this aspect."

15 **A.** Yes.

16 **Q.** Why is your name being suggested in relation to
17 this disclosure request?

18 **A.** Probably because at that time I was the head of
19 delivery for IT in the Post Office.

20 **Q.** And was it usual for you to have a role in
21 relation to criminal proceedings?

22 **A.** I never had a role in relation to criminal
23 proceedings. I don't even believe I was
24 contacted in respect of this.

25 **Q.** So why is your name being mentioned in respect
227

1 the error logs. I will contact Gareth Jenkins
2 to find out what transpired at the meeting with
3 Charles McLachlan."

4 So this was essentially a disclosure request
5 made in criminal proceedings. If we scroll up
6 we have Andrew Winn; do you know Andrew Winn?

7 **A.** No.

8 **Q.** Andrew Winn says there:

9 "John, Rod Ismay, the head of P&BA ..."

10 Do you remember Rod Ismay?

11 **A.** I remember Rod, yes.

12 **Q.** "... is not happy at the prospect of an
13 open-ended invite. He has asked the question of
14 what are the legal parameters we are working
15 with. Simplistically, if we refuse or impose
16 conditions do we lose the case? I think we need
17 more guidance on how something like this might
18 reasonably operate."

19 If we go up, who is Jon Longman?

20 **A.** I don't know who Jon Longman is.

21 **Q.** Jon Longman is responding to Jarnail Singh, and
22 he's saying:

23 "Jarnail, I've spoken to a few people
24 regarding the three points raised by Izzy Hogg."

25 That's the solicitors for Seema Misra.
226

1 of this?

2 **A.** I'm afraid you'll have to ask Andrew Winn that.

3 **Q.** Did you ever recall being involved or asked to
4 assist in any way with evidence or matters
5 relating to criminal or civil proceedings?

6 **A.** I don't believe I was ever asked to deal with
7 that unless it was, you know, without me knowing
8 it was a criminal thing.

9 **Q.** Would you be asked to produce statements, or to
10 produce -- to carry out investigations, or to --

11 **A.** No, I mean the only thing I can recall in
12 anything connected -- and I don't know if this
13 is connected to this, or something completely
14 different, was Rod did do a piece of work to
15 investigate the integrity of Horizon -- I don't
16 know if it was original Horizon or
17 Horizon Online, because the two blend, but Rod
18 did an investigation into the integrity of the
19 system at the time, whichever one it was. And
20 I'm sure there are records of that, because I'm
21 sure it's in one of the packs that I've seen,
22 where he confirmed that, you know, in his view
23 and the view of people he had looking at it, it
24 was operating with integrity.

25 Now I'd been told that was before this time,
228

1 and as I said, it could even be original
 2 Horizon. As I said, I don't ever recall being
 3 consulted on anything with a legal connection
 4 like this.

5 **Q.** So you don't recall being consulted about the
 6 Second Sight -- the matters raised by
 7 Second Sight, and in relation to these criminal
 8 proceedings, you don't recall being --

9 **A.** No.

10 **Q.** And in both times, people have proposed your
 11 name?

12 **A.** Yeah.

13 **Q.** Thank you.

14 Sir, I don't have many questions left. I
 15 have about ten minutes left. I see it's 4.30.
 16 I'm hoping that there will not be any or many
 17 further questions. There may be something from
 18 Mr Whittam. I may address it very briefly.

19 **SIR WYN WILLIAMS:** I'm reluctant, for a number of
 20 reasons, to go much beyond, say, quarter to
 21 five. And we have got the witness remote, not
 22 in being, so to speak, so that if necessary we
 23 could have ten minutes, quarter of an hour, in
 24 the morning. Subject to his availability --
 25 I should add, Mr Burley.

229

1 **Q.** "Post Office Limited has, over the years, had to
 2 dismiss and prosecute a number of subpostmasters
 3 and Crown staff following financial losses in
 4 branches. A small number of those have made
 5 counterclaims that they were not guilty of the
 6 charges made but that Horizon System was
 7 faulty."

8 So he was asked to produce a report that
 9 effectively defended the position, or?

10 **A.** No. So the first paragraph talks about, you
 11 know, a small number of claims were not guilty
 12 of the charges but the Horizon System -- so
 13 that's the original Horizon System. But it's
 14 actually then just validating that the new
 15 system has got integrity. Obviously you can't
 16 validate that the old system had got integrity
 17 because we'd replaced it by then.

18 **Q.** Can we scroll down to the executive summary,
 19 please. It says there:

20 "POL has extensive control spanning systems,
 21 processes, training and support. Horizon is
 22 robust but like any system depends on the
 23 quality of entries by the users."

24 So it seems there to be suggesting that the
 25 quality of the entry of users is the issue, or

231

1 **THE WITNESS:** I have no availability tomorrow. I
 2 wasn't informed it was going to risk carrying
 3 on.

4 **SIR WYN WILLIAMS:** I appreciate -- anyway, don't
 5 let's debate it for the moment.

6 **MR BLAKE:** Can we see how we get on?

7 **SIR WYN WILLIAMS:** Let's see where we get with
 8 Mr Blake.

9 **MR BLAKE:** Thank you.

10 You've just mentioned the Ismay report. Can
 11 we go to POL00088991, please. That report is
 12 2 August 2010, so it's actually very shortly
 13 after this email about the Seema Misra case. So
 14 Seema Misra was 27 July 2010, the top email.
 15 And this report is 2 August 2010. Was this the
 16 report you were talking about? The Rod Ismay
 17 report?

18 **A.** It looks like it, yes.

19 **Q.** And you're copied there?

20 **A.** Yes.

21 **Q.** And this is called Horizon Response to
 22 Challenges Regarding System Integrity. Do you
 23 remember why this report was produced?

24 **A.** I think, you know, because of the reasons in the
 25 first paragraph.

230

1 the significant issue.

2 "Horizon Online builds on this and brings
 3 benefit to running costs and change management.
 4 It is not being done because of any doubt about
 5 the Horizon of integrity."

6 It then says:

7 "The integrity of Horizon is founded on its
 8 tamper-proof logs, it's real time back-ups and
 9 the evidence of 'backdoors' so that all data
 10 entry or acceptance is at branch level and is
 11 tagged against the log-on ID of the user. This
 12 means the ownership of the accounting is truly
 13 at branch level."

14 Now that wasn't correct, was it, about the
 15 absence of backdoors and everything being at
 16 branch level?

17 **A.** How do you mean?

18 **Q.** Well, was that correct? Did you agree with that
 19 proposition?

20 **A.** To a degree. I might have worded it slightly
 21 different. And the absence of unauthorised
 22 backdoors.

23 **Q.** So there were backdoors, but they were --

24 **A.** Well, any system has to be maintained, yes. So
 25 you do need, you know, a control system such

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1 that you can go in and make appropriate, you
2 know, new coding, for example, et cetera, that
3 needs to be done on any system. But it's that
4 authorised backdoors that I'm emphasising.

5 So on Horizon Online, it was certainly
6 always built and tested as a two-person entry.
7 So there had to be two persons involved to make
8 sure it had that authorisation.

9 **Q.** When you read this for the first time, did you
10 say, "That bit's not right"?

11 **A.** I didn't say it's not right; I just questioned
12 the wording.

13 **Q.** Who with?

14 **A.** Myself. I read it -- you said when I read it
15 for the first time, so when I --

16 **Q.** You received it 2 August 2010, you're copied in.
17 On reading this, did you say, "Hang on a minute,
18 what it's saying about backdoors is wrong"?

19 **A.** I don't recall, to be honest, at that point, who
20 I raised it with. I was more interested in what
21 were the important lessons that we had to learn
22 from it.

23 **Q.** The final paragraph on that page:

24 "There are several improvement opportunities
25 for POL, and these are set out in Appendix 1.

233

1 we had quite a bit of what I'm going to use the
2 term "noise", because people were not used to
3 it. But actually, very quickly that noise died
4 down from the users, but it almost kept a
5 balance because as new users came on, you got
6 the same noise because they just weren't used to
7 that new user interface. And it was
8 specifically done that way because, had we kept
9 the user interface as it was, that was part of
10 the problem with original Horizon and why some
11 transactions were taking longer than they needed
12 to: because they had to navigate several
13 screens, whereas we made it much quicker and
14 easier to navigate to transactions.

15 **Q.** Thank you. That's not quite the point I'm
16 making, but I'm going to have to move on because
17 of time. But I just ask, are you really saying
18 that the phrase "noise" there is used in
19 a neutral term, as a neutral term, or is it
20 being critical?

21 **A.** I think on this one it's critical. It's
22 a negative in this one.

23 **Q.** Can we look at POL00091384, please. This is
24 document from November 2010. It's an email.
25 It's an email from Lynn to Mike and Rod, so

235

1 They do not undermine POL's assertion regarding
2 the integrity of Horizon but they would tackle
3 some of the other noise which complainants feed
4 on."

5 That phrase, "noise", that was something
6 that you -- that was a phrase that came up in
7 your witness statement, as well, that I took you
8 to earlier. Was that a common word that was
9 used at the Post Office to describe the
10 complaints about the Horizon System?

11 **A.** Yeah, but only in the sense of, you know, noise
12 can be good or bad. So, you know, don't
13 interpret it as being necessarily negative.
14 It's negative in this context, and obviously we
15 had to take note of the noise and make sure we
16 acted upon it. And that's one of the reasons,
17 as I said, we had the Federation in with us --
18 so they could help us with that noise and help
19 us either (a) understand it, or (b) you know,
20 they would help promote the right communications
21 that would help alleviate the noise.

22 One of the biggest bits of noise that we had
23 was in the early days of deployment, because we
24 made a conscious decision to substantially
25 change the user interface, and because of that,

234

1 including it to Rod Ismay. It's the second --
2 Lynn Hobbs. If we look over the page, sorry.
3 Who was Lynn Hobbs?

4 **A.** At the time, Lynn would have been probably
5 a regional manager, I think, at the time.

6 **Q.** This is November 2010. She says:

7 "I found out this week that Fujitsu can
8 actually put an entry into a branch account
9 remotely. It came up when we were exploring
10 solutions around a problem generated by the
11 system following migration to HNG-X. This issue
12 was quickly identified and a fix put in place,
13 but it impacted around 60 branches and meant
14 a loss/gain incurred in a particular week in
15 effect disappeared from the system. One
16 solution quickly discounted because of
17 implications around integrity was for Fujitsu to
18 remotely enter a value into a branch account to
19 reintroduce of the missing loss/gain. So POL
20 can't do this, but Fujitsu can."

21 Was this the point you qualified earlier,
22 that actually, it is possible for Fujitsu to --

23 **A.** Yes. That should have been two people doing
24 that. I don't know, obviously, in this
25 particular case whether it was, but it should

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1 have been.

2 **Q.** If we look at page 1, we have, at the bottom of
3 page 1, an email from Lynn Hobbs. She says
4 there in the third sentence:

5 "I haven't seen anything further, but I did
6 have a conversation with Mike and the whole
7 remote access to Horizon issue. This was being
8 looked into by Andy McLean and Mark Burley."

9 Do you remember being asked to look into it
10 at all?

11 **A.** I don't remember being specifically asked to
12 look into this one, no.

13 **Q.** Do you think that's likely, or again, was your
14 name being misused?

15 **A.** I honestly don't recall. At 3 December 2010 it
16 could have been I was asked to, and I would have
17 then passed that on to the then Horizon
18 programme manager, which was Will Russell,
19 because I would have been in a head of projects
20 role at this stage. And, you know, I'd have
21 actually given an honest answer that Fujitsu can
22 access it, as long as there's two people doing
23 the piece to give that control.

24 **Q.** If we look up to the top of this chain, from
25 John Breeden. Do you know who John Breeden was?
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1 anyone, "Hang on a minute, the Ismay report,
2 once again this has reminded me, that bit about
3 remote access, that's wrong"?

4 **A.** I'm not sure why I would, because I'm not on
5 this, am I?

6 **Q.** Well, no, but you've been mentioned about
7 looking into the problem, looking into the
8 remote access. So you were in 2010, it seems,
9 according to the email from Lynn Hobbs at the
10 bottom of this page, charged with looking into
11 the remote access with Horizon issue. Having
12 looked into it, did you consider raising any
13 flags?

14 **A.** As I said to you, I was only asked to look into
15 it in December 2010.

16 **Q.** You can't recall looking into it, did you say?

17 **A.** I don't recall being asked to look into it. I'm
18 not definitively saying I was or I wasn't, but
19 I don't recall.

20 **Q.** Thank you. One final, very small issue -- and
21 I will only take five minutes on this -- it's
22 the issue of training. Can we look at
23 FUJ00000559. In your witness statement,
24 paragraph 8, you say you can't comment on
25 training for Legacy Horizon. There is
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1 **A.** No.

2 **Q.** He was the national contract manager, North Post
3 Office. He's emailing Angela van den Bogerd.
4 Do you remember Angela van den Bogerd?

5 **A.** Yes, to a degree, yes.

6 **Q.** And who was she?

7 **A.** She was something in the network, but I don't
8 remember what her exact role was.

9 **Q.** Okay. Do you recall how high up within the Post
10 Office this issue of remote access, and the
11 ability of Fujitsu to remotely access the
12 account, was known?

13 **A.** No, I don't know.

14 **Q.** Do you think it would be higher than Angela van
15 den Bogerd?

16 **A.** I don't know what level Angela van den Bogerd
17 was, but yes, I'd like to think so.

18 **Q.** Having read the Ismay report in the summer --

19 **A.** -- to be unauthorised access. That's the key
20 thing here. If it's just a misunderstanding and
21 it turns out that Fujitsu have legitimately
22 accessed the system, then I wouldn't expect it
23 to go higher.

24 **Q.** Having read the Ismay report in the summer, and
25 we're now in December of 2010, did you tell
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1 a document that I've been asked to bring to your
2 attention. It's 12 May 2000. It's the final --
3 at the bottom of it -- it's a Change Control
4 Note and it refers to you in that bottom
5 paragraph:

6 "A number of discussions have been held to
7 identify a suitable mechanism for delivering the
8 results requested, and Mark Burley confirmed to
9 John Pope by email on 12th May 2000 that the
10 only change Pathway was now being asked to make
11 was the one detailed below."

12 And we go over the page, the Change Control
13 Note in itself isn't important. The passage
14 that I'm going to draw to your attention is
15 this, it's the second paragraph:

16 "This Change Control Note is based on the
17 assumption that to minimise costs, the training
18 systems will not be updated."

19 Do you recall, during your involvement with
20 Horizon -- Legacy Horizon/Horizon Online --
21 training systems not being updated because of
22 costs issues?

23 **A.** I don't recall it, no, and I'm surprised that it
24 wasn't. But looking at the actual detail of the
25 change, this was a change to a non sort of
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1 financial value cash account entry. It's not
 2 a financial entry. My guess is it's not that it
 3 won't be updated; it will not be updated at this
 4 time. I can't believe it wasn't updated, full
 5 stop.

6 **Q.** Thank you.

7 And the final question also relates to
 8 training. You have said in your statement --
 9 you refer to the NFSP in the context of the
 10 training and assurance with HNG-X. You say that
 11 there was a test before official use of the
 12 system was approved, and that this was developed
 13 across multiple parties including the NFSP. Can
 14 you tell us who else was involved, briefly, and
 15 your recollections of what the NFSP involvement
 16 in developing that was, vis à vis any others?

17 **A.** Yes. So one of the things that I put in place
 18 was -- we called it a tripartite way of working,
 19 and it involved the NFSP, who represented all of
 20 the subpostmasters; the CWU, and some members of
 21 my programme team. Now, on occasions that
 22 created conflict in itself because sometimes the
 23 CWU, who represented the directly owned
 24 branches, and the NFSP would have different
 25 priorities. But they were all involved in
 241

1 been referred to. We can address the issues we
 2 want to address at a later stage. I don't need
 3 to ask any questions.

4 **SIR WYN WILLIAMS:** Yes. I think that we've now run
 5 our course, Mr Blake. And if anybody did have
 6 any further questions, I was going to say that
 7 they would have to submit them to me first so
 8 I could decide whether it was necessary to ask
 9 them. And if I so decided, we'd have to arrange
 10 with Mr Burley when he could be asked them.
 11 There's a limit for both him and the transcriber
 12 and, I have to say, me, as I get older. After
 13 4.30 it's quite difficult.

14 Mr Burley, that's it. Thank you for coming
 15 to give evidence. And I suspect that we won't
 16 trouble you further, but that's not an absolute
 17 guarantee, all right, because I have cornered
 18 people into being quiet for the moment.

19 **THE WITNESS:** Well, any help I can give.

20 **SIR WYN WILLIAMS:** Right, fine.

21 10.00 tomorrow, Mr Blake?

22 **MR BLAKE:** Thank you.

23 **SIR WYN WILLIAMS:** Fine.

24 (4.47 pm)

25 (The hearing adjourned until 10.00 am
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1 putting together the testing, which my Business
 2 Change Team would have led. And probably --
 3 I can't recall exactly, but probably --
 4 undertook that testing to assure it was fit for
 5 purpose, would be my guess, that they had got
 6 involved with.

7 **Q.** Put very simply, what was the difference between
 8 the NFSP and the CWU, in very simple terms, to
 9 the best of your recollection?

10 **A.** Well, the difference is a priority of things,
 11 because it depends on how their members get
 12 paid. So the NFSP might want to prioritise
 13 a transaction of, you know, to a higher screen
 14 than the CWU because their members get a higher
 15 payment for it, whereas for the CWU, you do more
 16 of transaction X which wasn't as important to be
 17 higher up on the Federation because they didn't
 18 get paid as much for it.

19 It was always resolved amicably. We had
 20 discussions, we had -- it was just, you know,
 21 one of the examples that I recall where there
 22 was a conflict.

23 **MR BLAKE:** Thank you very much. Mr Whittam has
 24 a brief comment or question.

25 **MR WHITTAM:** Sir, given the hour, a document has
 242

1 **the following day)**

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