

1 **Monday, 27 February 2023**

2 **(10.00 am)**

3 **MS KENNEDY:** Good morning, chair.

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

5 **STEPHEN ROBERT GRAYSTON (sworn)**

6 **Questioned by MS KENNEDY**

7 Q. Could you state your full name, please.

8 A. Stephen Robert Grayston.

9 Q. You should have a copy of your witness statement in

10 front of you. For the transcript that's WITN03920100.

11 Have you got that statement there?

12 A. Yes.

13 Q. If you turn to page 28, please, is that your signature

14 there?

15 A. It is, yes.

16 Q. It's dated 14 September 2022; is that right?

17 A. It is, yes.

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

19 A. Yes, it is.

20 Q. That witness statement is now in evidence. Everything

21 I'm going to ask you is supplemental. Can I first thank

22 you for coming to give evidence to the Inquiry today.

23 Your statement covers a variety of issues but

24 today I'm going to focus on Phase 3 issues. But if we

25 could start by talking about your background, you

1

1 Q. The Inquiry's heard a great deal of evidence about the

2 acceptance process so I'm not going to take you through

3 all of that, but at the time Horizon was rolled out did

4 you believe the system was robust?

5 A. Yes. There were bugs, there were defects that had been

6 captured and listed, but fundamentally my understanding

7 was that the system was working and producing figures

8 and outputs that were consistent with transactions and

9 the inputs that the system was receiving.

10 Q. You mentioned that you were aware of bugs, errors and

11 defects. What were some of the issues that you were

12 aware of prior to rollout or prior to the acceptance?

13 A. I think within the material that I'd been sent there was

14 various reports coming out of testing on what the

15 results of running various scripts, et cetera, were

16 showing and, you know, as in any programme that I've

17 been involved in, you know, the good part is that these

18 things are being flushed out, that they're being

19 understood and they then need to be fixed.

20 So, you know, the follow-on from that is an

21 evaluation as to the seriousness, either individually or

22 as a consolidated group, of those defects that are

23 arising as a result of testing. So there comes a point

24 where you evaluate whether to move forward because what

25 remains to be fixed is deemed to be not significant, or

3

1 started working for the Post Office as part of the Royal

2 Mail Group in January 1986; is that right?

3 A. Correct, yes.

4 Q. You left the Post Office when the Royal Mail Group split

5 in April 2012 --

6 A. Yes.

7 Q. -- is that right? And you have worked a variety of IT

8 jobs since then?

9 A. Yes.

10 Q. In 1995 you were appointed as a manager in the BA POCL

11 programme; is that right?

12 A. Correct, yes.

13 Q. What did that involve initially?

14 A. The first role that I had was to support the evaluation

15 of potential partners/suppliers for the scope of the

16 programme and my particular role was to look at support

17 service proposals.

18 Q. How did that change over time?

19 A. So as the programme moved forward into its next phase,

20 I moved into the implementation team and then did

21 various work in the implementation team, probably most

22 significantly was around -- in office migration.

23 Q. I believe you were involved in the acceptance process;

24 is that right?

25 A. I was, yes.

2

1 you hold and fix all the things that need to be fixed.

2 Q. Were you aware at that time about issues with EPOS, the

3 electronic point of sale?

4 A. Sorry, what -- depends -- what do you mean by issues?

5 Q. Well, problems, that that had been a persistent issue

6 and that Post Office felt that that needed to be

7 actioned by Pathway in order to correct it or to ensure

8 the data integrity of the transactions that were being

9 shown?

10 A. From the material that I've been sent, I've seen

11 reference to advice about rewriting EPOSS completely.

12 That was not something I was aware of. That there were

13 concerns over fundamental issues, no, I can't -- you

14 know -- no, because, as a -- effectively, on the

15 operational side, working with the regions, the

16 IP areas, it was our job to make sure that we had

17 something that was being implemented that was

18 trustworthy.

19 Q. And it was trustworthy at the time of rollout in your

20 mind?

21 A. Yes, yes.

22 Q. If we could turn up our first document, please,

23 POL00028441, I'm just going to take you to this.

24 This is a Christmas Horizon Research Report that

25 was carried out in January 2000. Were you aware of this

4

1 at the time?

2 **A.** I believe I saw a copy of this, yes.

3 **Q.** What did you think of it at the time; do you remember?

4 **A.** To some extent it wasn't a surprise. If you have

5 60,000 users and then you have -- you know, and that's

6 at the front end, front office, and then you have users

7 in the back office, that they struggle to understand and

8 use the system would be expected from some users, yes.

9 **Q.** If we could turn over on to the next page, please --

10 sorry, the next page again, yes -- we can see that this

11 is appendix 2, which contains some verbatim comments

12 from subpostmasters. Just to be clear, you saw the

13 report and also this appendix at the time or ...?

14 **A.** I can't be absolutely certain but I would have expected

15 to see it, yes.

16 **Q.** If we could turn to page 15, please, and we can scroll

17 down. The Inquiry's been through this report before but

18 just for your benefit there's a section entitled "Not

19 enough training on balancing" and we see there some of

20 the comments:

21 "Training for accounting was very bad. Balancing

22 took hours to sort out, and was kept up until midnight

23 sometimes. Tried to call helpdesk but it was always

24 almost engaged. But needed for time on balancing. The

25 1st day was all right, but the quality of the training

5

1 **Q.** If we turn to page 19, please, and scrolling down we can

2 see one section entitled "I'm not computer literate".

3 So a moment ago you were talking about people who

4 were used to working in a certain way. This shows the

5 level that some people were at in terms of their base

6 level of computing, doesn't it?

7 **A.** Yes, yes.

8 **Q.** We can see that some people describe it as:

9 "It was frightening. We were thrown in at the

10 deep end and it was very unsettling. It was

11 particularly difficult for those who had no previous

12 experience with computers. They did not take account of

13 our needs."

14 **And:**

15 "I am not a computer person, I was put with people

16 who had used them and with people who worked in head

17 post office. I did not need half the information given

18 it was a waste of time when there was other things

19 I needed --total confusion in the end."

20 So the Post Office were expecting people to go

21 from not using computers at all in their day-to-day work

22 to being across quite a complex system; would you accept

23 that?

24 **A.** Yes. I -- you know -- yes, yes.

25 **Q.** It's fair to say, isn't it, that some postmasters at the

7

1 was not good on the 2nd day."

2 Further down:

3 "They didn't inform us very much on cash

4 accounts."

5 So there's quite a lot of feedback, I'm not going

6 to take you through it all, but it sets out that people

7 were quite frustrated at the amount of time that was

8 being spent on training on balancing. Would you accept

9 that?

10 **A.** Yes.

11 **Q.** Is that something -- you mentioned a moment ago that you

12 would expect a certain level of difficulty or people to

13 find things difficult to a certain degree. Is this in

14 line with what you would have expected?

15 **A.** I think my expectation is a generalisation in terms of

16 the change curve. You know, when you ask people who

17 have worked in a certain way for a long time to change

18 the way that they are working then some will struggle

19 and some will adopt the change very easily.

20 I think, though, you know, in this particular

21 point, what was being referenced is that the training

22 itself wasn't good enough. So irrespective of the

23 general point of people struggling with adopting to the

24 requirement for change, the training itself should be

25 adequate to allow people to operate the system.

6

1 beginning struggled to use the system?

2 **A.** Yes.

3 **Q.** Would you accept that if someone finds a system

4 particularly difficult to use, they are more likely to

5 make errors when inputting the data that's held on that

6 system? Would that be right?

7 **A.** I think that's fair. You know, it takes longer. People

8 who don't have the understanding -- you know, even if

9 there's a helpdesk, there's the call out for support,

10 but there is the risk of error, yes. Yes.

11 **Q.** If we could take that document down, please, and turn to

12 NFSP00000513, please.

13 This is a report of the National Executive Council

14 of the NFSP in March 2001. Now, you wouldn't have been

15 at that meeting but there's just one point that I wanted

16 to take you to.

17 If we could turn to page 15, please, and scrolling

18 down, please.

19 So this is a Mr Peberdy, who the Inquiry has

20 already heard from. It's him making a report to the

21 meeting. He says:

22 "Mr Peberdy reported that these problems are still

23 being highlighted [this is polling problems] and just

24 recently had been circulated and reported on the

25 problems in organising meetings with the business but

8

1 now monthly meetings had been scheduled and there had
2 been a meeting on the 26th February 2001 from which
3 could be seen from the Action Points, there were
4 28 items that required action, some of them the business
5 still had to come back to them on.

6 "Amongst it one was to set up the two day meeting,
7 a separate meeting on Losses and Gains Policy,
8 a separate group to bring in the Horizon problems.
9 There had been stories about the problems that had been
10 created by Horizon, shortages, Horizon was not doing
11 things, the problem with losses having to be made good
12 immediately, and all the things about Suspense Accounts.
13 He reported that he wanted a group to examine this. He
14 had been led to understand that there was £10 million in
15 Suspense Accounts now as opposed to about £2 million
16 18 months ago. Another feature of the system was that
17 it highlighted everything."

18 So looking at that, it appears that after Horizon
19 was introduced the money held in a suspense account went
20 from 2 million to 10 million; is that right?

21 **A.** In terms of what I see on the screen and what Mr Peberdy
22 reported, yes, I mean, I heard this -- I can't remember
23 the context in which I heard the same point but the
24 point about Suspense Account and the amount going from
25 2 million to 10 million was something that came up in

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1 suspense was much more visible, whereas before, for
2 whatever reason, it wasn't that number.

3 **Q.** What does that increase from 2 million to 10 million
4 suggest to you?

5 **A.** Well, it suggests that there are errors that are being
6 posted to suspense that need to be looked at. You know,
7 what -- my first question is: what has caused the
8 posting to suspense of a fivefold increase? You know,
9 it doesn't seem to make a lot of sense.

10 **Q.** What do you think the reason was?

11 **A.** I don't know. I honestly don't know. I mean, the
12 analysis was going on and speculation on my part was not
13 going to help because I wasn't close to the detail,
14 neither was I expected to be, you know, involved in the
15 analysis or close to the detail. But there were other
16 people with the right level of knowledge that you would
17 expect were looking at this and examining it.

18 **Q.** What were they saying about this? What was their
19 theory?

20 **A.** I didn't see -- I didn't see any follow-up. You know,
21 as I say, the context in which I heard this, you know,
22 I'm comfortable in saying that I recognise that comment,
23 but I didn't see any follow-up that said, you know,
24 "This is the result of our analysis, you don't need to
25 worry", et cetera, et cetera. But that Mr Peberdy had

11

1 a conversation somewhere. I recognise that, yes.

2 **Q.** You recognised that, that -- a conversation around this
3 time, March 2001?

4 **A.** I can't say with any certainty of a specific date but,
5 you know, that would be, I guess, roughly, yes, it would
6 be appropriate.

7 **Q.** That conversation, I appreciate you've said you don't
8 really remember but was it something that members of
9 your team or you were particularly concerned about at
10 the time?

11 **A.** Yes, because that is a fivefold increase, and as
12 I understood it there was analysis going on. I mean,
13 I think there was -- and I think Mr Peberdy states that,
14 you know, everything was being flushed out and I think
15 that was the context in which I heard, you know, the
16 increase from 2 million to 10 million, that everything
17 was being flushed out.

18 But that didn't explain, doesn't explain, you
19 know, what is going on. So I understood that there was
20 some analysis on this going on.

21 **Q.** What do you mean by everything being flushed out?

22 **A.** Well, because the Horizon System had been implemented
23 and therefore data was flowing through the system -- it
24 wasn't manual -- the information that was being received
25 in finance through what was being reported as in

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1 seen it, you know, there were others that understood it,
2 and I expect there would have been a report somewhere
3 stating what the cause was and what was happening.

4 **Q.** But even though you were aware of this fact, you didn't
5 check to see what the outcome of that was?

6 **A.** No, I didn't, no.

7 **Q.** Does this not seem like quite an important point?

8 **A.** It seems like an important point, yes. I mean, it --
9 looking at it now, yes, it seems like something that
10 should have been clearly understood and articulated back
11 through the programme, so that the programme could then
12 articulate what was going on back to the relevant
13 business stakeholders.

14 What I can't -- having said that, what I can't say
15 to you is that there may well have been a strand that
16 had done the analysis and had reported back to various
17 stakeholders. You know, in my world it disappeared.

18 **Q.** Moving forward in time then to the IMPACT programme, you
19 were change management lead on IMPACT; is that right?

20 **A.** Correct, yes.

21 **Q.** What did that involve?

22 **A.** So it involves understanding, effectively understanding
23 the nature of the change. So what was the business
24 intention? What was being changed by business unit,
25 whether it's finance or operations or audit? So what

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1 was changing process, what was changing system, and,
 2 having done the gap analysis between what people did
 3 today and what they would be expected to do tomorrow, to
 4 work on training and processes to enable people to move
 5 from one state to the future state. In the area that
 6 the changes were -- had the highest level of impact, for
 7 example, in areas in finance, organisational design
 8 would come into it because you may have people exiting
 9 the organisation and new skills and new people coming
 10 into the organisation, and, depending on the scope of
 11 business change -- and I can't quite remember but
 12 there's also the point about communication. So, you
 13 know, communicating to stakeholders as well.

- 14 Q. From what you've said it doesn't sound like you were
 15 involved in the primary decision making in terms of what
 16 it would actually involve. Your role was to do with
 17 carrying out the changes that other people had decided
 18 upon; is that fair?
 19 A. Yes, I mean, the documents that I was sent were, you
 20 know, clearly laid out in terms of business strategy and
 21 what -- the reasoning behind the IMPACT programme, yes.
 22 Q. You set out what you understood the purposes of the
 23 IMPACT programme to be in your witness statement.
 24 If we could pull that up at WITN03920100, and if
 25 we turn to page 20, please.

13

- 1 clients.
 2 A. Yes. I mean, the -- you know, in my understanding, you
 3 know, part of the reasoning was to ensure that data was
 4 generated accurately at the counter, that it was
 5 harvested into the finance systems accurately, and then
 6 passed to clients accurately and in a timely manner.
 7 I think in the legacy world -- and, you know, I'm
 8 not an expert on the legacy systems by any stretch --
 9 but there were timing discrepancies that would arise.
 10 So, you know, one of the things about simplification and
 11 the use of, you know, the new systems was to increase
 12 speed, accuracy -- yes.
 13 Q. Yes. Summarising that, I suppose, is do you agree that
 14 part of the reason for the programme was that the
 15 Post Office felt that cash was going missing?
 16 A. Yes, yes.
 17 Q. Was that a big driver?
 18 A. It wasn't -- it was definitely a driver. I mean,
 19 I think there was reference to, you know, remittances,
 20 for example, into branches, you know, that were -- where
 21 leakage or loss was being experienced. So, you know,
 22 if, as a process, you can automate remittances and
 23 tighten up that process, then you're reducing the risk
 24 of loss or leakage. So, yes, it was definitely a driver
 25 of the programme.

15

1 Looking at paragraph 52, scrolling down, it says:
 2 "I believe that the IMPACT Programme was driven by
 3 the need to simplify and update many backend legacy
 4 systems to improve efficiency, accuracy, and lower
 5 operational costs. At the front end, in offices, the
 6 Programme also introduced the capability for Smart Card
 7 transactions and changed the Suspense Account process
 8 from manual to an automated process. The Releases also
 9 introduced various other changes to the Horizon System
 10 that were related to either products or service
 11 improvements."

12 So is that how you understood the purpose of the
 13 project, this programme?

- 14 A. That's my reflection now. I might have been able to
 15 give you a more detailed statement a few years ago but,
 16 yes.
 17 Q. Did you hear the evidence of Mr Philip Boardman?
 18 A. I think I did. It was only a few days ago, wasn't it?
 19 Q. Yes. He told the Inquiry that part of the
 20 simplification process that IMPACT envisaged was so that
 21 debt would be more visible. Do you agree with that?
 22 A. Debt would be more visible ... In the sense of the
 23 suspense account? In what context was ...?
 24 Q. Was simplifying things so that it's more obvious what
 25 debt is owing by either the subpostmasters or by

14

- 1 Q. If we could turn up POL00038870, this is the accounting
 2 and cash management programme conceptual design, and if
 3 we scroll down, we can see your name is not on the list
 4 as programme manager or a design authority, but you
 5 would have seen this document at the time?
 6 A. At the time of the conceptual design -- sorry, can you
 7 just give me the date?
 8 Q. Yes. So if we scroll over, I think this is the date --
 9 if we scroll over on to page 5, we can see that the
 10 document history is September 2003, if we scroll down to
 11 the bottom.
 12 A. Yes, I mean, I think at that point I would have expected
 13 to see it, yes.
 14 Q. If we could turn to page 14 of that document, please,
 15 and scrolling down, please, we can see at 3.2.2 the "Key
 16 Priorities" in this context, and it says:
 17 "2 fundamental changes have made Post Office
 18 Limited's funding position a critical business survival
 19 issue:
 20 "- The business is trading at a loss
 21 "- The migration of benefits to ACT will be
 22 accompanied by the loss of pre-funding by government
 23 departments of the necessary cash in the network.
 24 "The business now has to borrow funds to fund its
 25 trading losses and to fund working capital needed in

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1 branches. Such borrowing is limited in availability and
2 its cost add to the trading loss. From April 2003 DTI
3 [Department of Trade] will provide a loan and I will
4 require a robust statement of cash holding as security."

5 So at that time the Post Office was trading at
6 a loss and in a pretty dire financial situation; is that
7 right?

8 **A.** Yes, as far as I was aware, yes. Yes.

9 **Q.** Could you help us with, at the time was that something
10 that was troubling people or worrying people? Was that
11 something that people felt had to be actioned quickly?

12 **A.** Well, it had been troubling. If I could just focus on
13 the second point, you know, in 1995 the point about ACT
14 was already recognised and the threat that benefits
15 payment by ACT represented. So for a number of years,
16 through Horizon, IMPACT and then the Post Office Card
17 Account programme, this threat to Post Office and the
18 financial position had first of all been recognised but
19 then had materialised.

20 **Q.** So there was a need to bring in cash; is that right?

21 **A.** There was a need because the payment of pensions and
22 allowances was the significant product or service that
23 was offered by post offices, without being able to
24 replace -- if that business was lost, without being able
25 to replace it, then the Post Office's position would

17

1 back to offices more quickly. But the onus would be on
2 the people in the Post Office, the office manager or
3 subpostmaster, yes, to understand how an error had
4 occurred if their account was not balancing.

5 **Q.** Or identify the error before it's put in, because they
6 are the people who are putting in -- manually -- the
7 processes and handling it on a day-to-day basis, isn't
8 that right?

9 **A.** They are certainly handling transactions on a day-to-day
10 basis, yes.

11 **Q.** So they would be the ones, in the first instance, who
12 are responsible for identifying those errors; correct?

13 **A.** Yes.

14 **Q.** At this stage was the reliability of Horizon taken as
15 a given?

16 **A.** The fundamental Horizon System and its ability to
17 accurately represent figures through transactions and
18 represent those into the back end systems, yes. There
19 were still individual issues or defects that, you know,
20 needed to be fixed, you know, as a matter of -- in my
21 experience as a matter of course that you will
22 inevitably always find some defect even if you've gone
23 through extensive testing. But something will always
24 turn up. It's the seriousness of what turns up that
25 needs to be assessed and that's why we had NBSC and the

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1 become worse financially, yes.

2 **Q.** So it needed cash?

3 **A.** Yes.

4 **Q.** Part of IMPACT was automating the part of the accounting
5 process that had previously been conducted in
6 Chesterfield, the error reconciliation; is that right?

7 There were a number -- 300 people in Chesterfield who
8 were carrying out checking processes?

9 **A.** Yes, it was a -- like a big paper factory, yes. Yes.

10 **Q.** So part of what was envisaged was the reduction of those
11 costs and move to automation; is that right?

12 **A.** Correct and that's -- when I talked about organisational
13 redesign, that would have been, yes, one of the areas.

14 **Q.** Most of the people who were based at Chesterfield doing
15 that job of checking, they would have been removed
16 essentially after IMPACT or cut down severely?

17 **A.** Yes.

18 **Q.** Would you accept that part of the IMPACT programme
19 envisaged the shift of responsibility from that team to
20 identify errors, to the subpostmaster to identify the
21 errors in the branch?

22 **A.** I think there's perhaps two parts to it. I think
23 part one would have been that the introduction of the
24 systems should have exposed errors quickly, which would
25 have resulted in automated error notices being generated

18

1 HSHD.

2 **Q.** So the way of double checking it -- so you, in the first
3 instance, have the subpostmaster, but then the secondary
4 role is those helplines, the NBSC and the HSH; is that
5 what you're saying?

6 **A.** Yes. I mean, you know, they are absolutely
7 fundamental -- absolutely fundamental -- from early in
8 the programme, that people are contacting, you know, the
9 Helpdesk, creating the view of the data that then has
10 professional people analysing what the story is behind
11 what is being reported.

12 **Q.** But that's always going to be limited, isn't it, because
13 the people on the helpline aren't in the branch with the
14 person on the ground, isn't it? They are going to have
15 to go off what they can see on the system, potentially,
16 and what the subpostmaster tells them; isn't that right?

17 **A.** Correct. But if there is a recurring theme in calls
18 coming in -- you know, users -- people express
19 themselves in different ways, and if there is an art in
20 it, it's to understand and articulate into the Helpdesk
21 system what the problem is and what the proposed
22 rectification is. But what you would expect is that
23 with recurring issues there is action taken, even if
24 it's not a system issue. So it may be that, you know,
25 training itself or a note needs to go out to branches to

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1 say, you know, "We have received concerns from
 2 subpostmasters over this type of transaction. Please be
 3 aware, you know, to take this particular action."
 4 So it doesn't necessarily always have to be
 5 system-driven but the analysis is critical, yes.
 6 Q. But at this time did you think back to what we've been
 7 discussing, about the value of money in the suspense
 8 account, and think, "Oh, I wonder if someone bottomed
 9 out", and why that money had gone from 2 million to
 10 10 million?
 11 A. No, I didn't.
 12 Q. Do you think that that would have been something, with
 13 the benefit of hindsight, you should have done?
 14 A. With the benefit of hindsight, yes.
 15 Q. If we could turn to the next document, POL00038878,
 16 please. So this is the another document to do with
 17 conceptual design. This is "Branch Trading Reporting,
 18 Management and Control and Transaction Management.
 19 Conceptual Design". Again, would this have been the
 20 kind of thing that you would have seen at the time?
 21 A. Yes. I mean, there would have been a lot of documents
 22 being circulated talking about design, and I can see
 23 from the contribution that different areas of the
 24 business were obviously contributing to that view.
 25 Q. Can you explain what you mean by that.

21

1 the key -- or the "Key Priorities" of the IMPACT
 2 programme, which state:
 3 "Make the identification of debt easier
 4 "Reduce the amount of reconciliation required
 5 "Increase the amount of debt recovered
 6 "Put the emphasis on clients and customers to
 7 validate the data
 8 "Simplify branch processes by reducing the amount
 9 of paper
 10 "Centralise/consolidate agents debt
 11 "Enable matching of cash at branches with
 12 settlement with client."
 13 Those are consistent with some of the things we
 14 have been talking about, aren't they?
 15 A. Yes.
 16 Q. If we look further down at "Business Drivers/Issues", it
 17 states:
 18 "Re-focus on Debt Recovery (financial recovery of
 19 money), target 95%."
 20 Do you know what that would have been referring
 21 to?
 22 A. Well, I -- my assessment of that is that where losses
 23 had occurred, then it was the recovery of the monies
 24 associated with those losses or discrepancies, and
 25 primarily I guess that would have been focused on the

23

1 A. Well, I think, from -- from my recollection, I mean, in
 2 there it looks like there's audit, there's obviously
 3 finance, investigations team.
 4 Q. Could you just -- I think you are going through the
 5 names of contributors. Could you just tell us the name
 6 of the person and the field that they are speaking to.
 7 A. Tony, Tony Utting, I think would have been representing
 8 investigation or auditing in that area. Ann Clarke was
 9 an expert in the processes within Chesterfield.
 10 Karen Hillsden I think had been involved in the
 11 conceptual design, and Gareth Jenkins obviously was
 12 there from ICL Pathway.
 13 Q. Did you know Gareth Jenkins?
 14 A. No, I didn't, but I've seen his name a few times on
 15 various documents, yes.
 16 Q. Did you know him by reputation at the time?
 17 A. No. You know, I know he was an architect or the senior
 18 architect. You know, the -- my interface with the
 19 architect team primarily would have been Torstein, and
 20 I think it was Torstein that probably had the most
 21 conversation with Gareth.
 22 Q. That's Torstein Godeseth?
 23 A. Yes, yes.
 24 Q. If we could turn to page 13 of this document, please,
 25 and we scroll down, we can see again recorded as some of

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1 branch.
 2 Q. The subpostmasters or branch staff?
 3 A. Yeah, yes.
 4 Q. When it says in the second bullet point, "Only 10% of
 5 discrepancies are actually debt", what would that have
 6 meant?
 7 A. My interpretation of that is that -- I think I mentioned
 8 timing discrepancies previously. I think that, you
 9 know, one of the challenges with the legacy systems was
 10 to remove what looked like debt, it wasn't actually debt
 11 it was just the timing of cut-offs in systems when data
 12 was provided to other systems and that was subsequently
 13 resolved.
 14 Q. So it's a timing issue rather than -- can you just
 15 explain that again.
 16 A. I can explain my understanding. So my understanding is
 17 that if at the point that data is sent to, for example,
 18 a client that data from the front office, under the
 19 legacy world, may not have reached the central system,
 20 so there may be that money had been taken in but
 21 wasn't -- the data wasn't represented back to the client
 22 in a timely manner, and that might represent debt in
 23 certain circumstances.
 24 Q. In the majority of circumstances or ...?
 25 A. Well, I mean, it says only 10 per cent of the

24

1 discrepancies are actually debt. So, you know, as
 2 I say, my interpretation of that point, as I'm sitting
 3 here today, is I can relate it to timing. 90 per cent
 4 seems a high number but I didn't work in the back end in
 5 Chesterfield in finance, so, you know, that could well
 6 be accurate, yes.

7 Q. If we look at the bottom of Business Drivers/Issues", it
 8 says:
 9 "Accounting and settlement on our data, not
 10 clients."
 11 A. Yes.

12 Q. So when it says "our data" that basically means the
 13 Horizon data; is that right?
 14 A. Yes and, you know, it's a challenge that I've come up
 15 against, you know, in other programmes where settlement
 16 on client data versus the data that you have in-house
 17 leads to lots of questions, yes.

18 Q. So from this the Horizon data is becoming all the more
 19 important, isn't it?
 20 A. Absolutely.

21 Q. It's the start and end of the matter --
 22 A. Yes.

23 Q. -- as regards settlement with clients; is that right?
 24 A. Absolutely. If you want your clients to settle on your
 25 data, then your data has to be good.

25

1 staff. To help facilitate this, existing Horizon
 2 facilities that permit branch staff to post cash
 3 discrepancies to a cash suspense account will be
 4 removed. Remaining branch suspense accounts should only
 5 be used following prior to authorisation via Post Office
 6 central processes and will be restricted to use by
 7 branch staff with Horizon manager/supervisor roles."
 8 Is that in accordance with your understanding of
 9 what was to happen?
 10 A. Yes.

11 Q. It goes on to -- I mean, essentially what it is saying
 12 here is the suspense account is going to be removed,
 13 effectively, which is where subpostmasters previously
 14 posted discrepancies; isn't it right?
 15 A. Yes, the ability -- yes, I mean, the ability to post to
 16 suspense lay with a subpostmaster, or the Crown Office
 17 branch manager should they choose. Under the changes,
 18 that facility was no longer going to be there. It was
 19 being closed down.

20 Q. At the time this programme was being developed, was
 21 there a perception that subpostmasters were using the
 22 suspense account to hide money that they couldn't
 23 account for or had stolen?
 24 A. Yes.

25 Q. How prevalent -- unpacking that a bit, was it generally

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1 Q. So all of this is predicated on the idea that, to use
 2 your words, the Horizon data is good?
 3 A. Yes.

4 Q. Because without that, none of this works?
 5 A. Yes. Yes, it raises too many questions.

6 Q. If we could turn to page 15 of that document, please.
 7 **SIR WYN WILLIAMS:** Before we do that, could I just
 8 understand the word "client".
 9 Mr Grayston, do you understand client to include
 10 subpostmasters or are we talking about third parties
 11 whose products are being sold in post offices?
 12 A. Third parties, sir.

13 **SIR WYN WILLIAMS:** Right. So where we see in this list
 14 "Accounting and settlement on our data, not clients",
 15 you would agree that does not refer to subpostmasters?
 16 A. Correct.

17 **SIR WYN WILLIAMS:** Okay.

18 **MS KENNEDY:** If we could turn over the page, please, to 15,
 19 and scroll down, and down again, looking at
 20 paragraph 12 -- just down a bit further, thank you -- it
 21 states:
 22 "By the end of a monthly trading period, branches
 23 should be required to make good discrepancies between
 24 Horizon generated cash and stock positions and the
 25 actual physical position determined by branch office

26

1 the perception that subpostmasters were using it to hide
 2 amounts they'd stolen?
 3 A. In my experience -- because prior to joining the
 4 programme I had been with Royal Mail Group
 5 investigations -- there were instances where
 6 subpostmasters wished to use an amount of money for
 7 other purposes, not -- not with the intention of theft
 8 or permanently deprive, but wanted to or needed to use
 9 it for other purposes. So it was a facility or an
 10 opportunity, should someone so wish, to undertake
 11 something short-term using Post Office cash.
 12 There were instances, I believe, where it involved
 13 theft, and, you know, I'm sure there's a lot of analysis
 14 within Post Office on the types of cases, the numbers of
 15 cases, the amounts involved that, you know, were
 16 regularly discussed at a post office management level.

17 Q. You mentioned using the money for short-term purposes.
 18 A. Yes.

19 Q. That's not something that they were allowed to do,
 20 though, was it, to use that money in the suspense
 21 account for short-term purposes?
 22 A. No, no.

23 Q. So that's something equally Post Office would want to
 24 clamp down on and didn't want to continue?
 25 A. Yes, but it's -- I was distinguishing between somebody

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1 who perhaps was -- you know, or was stealing and
 2 somebody who was -- was -- been in need of an amount of
 3 money but it was not with the intention of keeping that
 4 money.
 5 Q. But in both cases Post Office didn't want them to be --
 6 well, they certainly didn't want them to be stealing but
 7 they also didn't want them to use that money for those
 8 purposes either --
 9 A. Well, it was Post Office money not the private business
 10 side money, yes.
 11 Q. Over the page, the document goes on to explain that
 12 suspense account can be cleared in several different
 13 ways, and that includes cash or transaction, the
 14 subpostmaster paying for -- out of their salary or
 15 credit card.
 16 I mean, in the IMPACT programme there was no
 17 provision here to challenge the sum owing on Horizon
 18 itself, was there?
 19 A. I think when the Horizon produced a position then the --
 20 you know, my understanding was that there was an
 21 opportunity to challenge but it wasn't, you know,
 22 through the system necessarily, it would have been
 23 through your retail line manager, maybe a call to the
 24 Horizon System Helpdesk saying that, you know, "This has
 25 happened, I don't know why". But that was the process

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1 subpostmasters?
 2 A. I actually think at this point in time, if anything, it
 3 was diminishing. You know, the -- the prosecution of an
 4 individual, you know, that Post Office went through was
 5 not, you know, a cheap -- it was expensive and -- but on
 6 the other side, you know, it was the deterrent effect as
 7 well.
 8 Q. So the deterrent effect was still important even if you
 9 felt that prosecutions themselves were becoming less
 10 important; is that what you're saying?
 11 A. Well, resolving in some appropriate way was absolutely
 12 important. If a situation was so significant and
 13 serious that prosecution was merited, then, you know,
 14 prosecution was appropriate. But, yeah -- so it is
 15 important, though, that if that is the step that you
 16 take, that the data on which you are basing your
 17 decision is robust, is accurate.
 18 Q. If we could turn to page 70 of this document, please.
 19 In fact if we could go back over the page to page 69 and
 20 scrolling down, just so you can see the context of what
 21 I am asking you about. This is in the context of
 22 "Discrepancy Management", and it mentions:
 23 "1. Receive Automated Message
 24 "2. Handle Transaction Corrections."
 25 We can see there the "Receive Automated Message"

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1 about making good was -- was what was agreed, yes.
 2 Q. So there was nothing on the system itself. What you've
 3 just described involves phoning the helpline but not on
 4 the system itself, you wouldn't dispute?
 5 A. Yes.
 6 Q. If we could turn to page 18 of that document, please,
 7 and scrolling down and looking at "Legal & Regulatory",
 8 it says:
 9 "It will be verified that branch processes and
 10 reporting changes meet legal and regulatory financial
 11 reporting constraints (eg auditors) to ensure that there
 12 is sufficient information from the new system to support
 13 regulatory reporting, litigation and criminal
 14 prosecution."
 15 Was the ability to prosecute subpostmasters under
 16 the criminal justice system a key driver or a key factor
 17 in the IMPACT programme?
 18 A. I think with any system, if you looked back to Ecco or
 19 Ecco+, which was in Crown offices, that the same
 20 statement would, I expect, apply, i.e. that the system
 21 produces data which is trustworthy to the extent that it
 22 can be used to support, if necessary, a criminal
 23 prosecution, yes.
 24 Q. In your mind at this time, how important was it within
 25 the Post Office to have the ability to prosecute

30

1 section.
 2 If we go over the page, I wanted to ask you about
 3 handling transaction corrections. So you can see there
 4 the description says:
 5 "This is the mechanism for Processing the
 6 Transaction Correction by the branch."
 7 It says:
 8 "Trigger: User Initiated
 9 "Automation: There will be a button for
 10 Transaction Correction Management within the menu
 11 hierarchy which is only accessible by users with the
 12 appropriate role. This will provide the user with
 13 a list of the unprocessed Transaction Corrections,
 14 displayed in date/time order. Having selected the
 15 Transaction Correction to process, the system will
 16 display text making clear what will happen when they
 17 select any of the options presented. For each
 18 Transaction Correction the user will have up to three
 19 options - Each option, when selected, will perform an
 20 identified set of transactions, defined within the
 21 Transaction Correction (which may include an option to
 22 Do Nothing - requesting further investigation).
 23 "Should the Transaction Corrections fail
 24 validation, then an error is displayed to the user with
 25 a request to contact NBSC. The Transaction Correction

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1 will be marked as complete, but no change will have been
 2 made to the local system."
 3 What type of situation does this envisage or how
 4 would this work?
 5 **A.** To be honest, I'm not quite sure. I'd have to take that
 6 away and have a long hard look at that.
 7 **Q.** That's fine, thank you.
 8 Turning then to our next document, if we could
 9 turn up POL00038909, please. We can see here "IMPACT
 10 Programme S80 Migration Strategy". Could you explain
 11 what is the document is and how it came about.
 12 **A.** The -- well, a migration strategy would define how you
 13 move from what you have or where you are to where you
 14 want to be and, in that sense, you know, I'd need to see
 15 the rest of the document as to what the scope was.
 16 **Q.** We know it refers to the S80.
 17 **A.** Yes.
 18 **Q.** If we could just look at your witness statement -- and
 19 that's WITN03920100, please -- and if we can look at
 20 page 23 and looking at paragraph 57 it says:
 21 "Within the scope of the S80 Release changes were
 22 introduced that moved office accounting away from weekly
 23 Cash Account production to Trading Periods and also
 24 introduced an automated process to manage Unclaimed
 25 Payments and Uncharged Receipts that existed as the
 33

1 generated into the systems and, at the back end, the
 2 ability for those systems to process the data, that any
 3 discrepancies could then be posted automatically --
 4 recognised automatically and posted automatically, is my
 5 very simple, simple way of understanding it.
 6 **Q.** So the S80 was an important release for making that
 7 fundamental -- I mean, it's quite a fundamental change,
 8 isn't it?
 9 **A.** It is a fundamental change, yes.
 10 **Q.** If we could turn back to that document that we were on
 11 before, which is POL00038909, please, if we turn to
 12 page 6, we can see the date of this document which is --
 13 the updated draft for discussion is 21 June 2004, and
 14 this is for discussion in the Design Authority. What is
 15 that?
 16 **A.** The Design Authority were effectively the people that
 17 had analysed and thought through conceptually what
 18 IMPACT was about, and then it had been broken down into
 19 constituent parts and the Design Authority, or my
 20 interpretation of a Design Authority's job, is to
 21 protect the design. As you may appreciate, the world is
 22 not standing still as this programme is taking place, so
 23 there are always new changes, maybe product changes, new
 24 products, challenges to the design coming in, and it is
 25 the job of the Design Authority to -- that effectively
 35

1 office level Suspense Account. Up until the S80 Release
 2 errors made by office in transacting business had been
 3 dealt with through a paper process that required office
 4 managers to post details (enter details) of the Error
 5 Notices into the Suspense Account; S80 introduced an
 6 automated posting process."
 7 So can you explain and clarify further what the
 8 S80 did?
 9 **A.** In the sense of this particular point, my understanding,
 10 if I'm remembering it correctly, was that error
 11 correction was a manual process. We talked before about
 12 the factory and all the people working on pieces of
 13 paper. Well, those people working on those pieces of
 14 paper would turn up errors and that would generate
 15 a paper error notice, which then would need to be posted
 16 back to the branch that made the error.
 17 Now, if things were working well, the branch --
 18 because this may be sometime later -- the branch would
 19 already have recognised in the accounting period that an
 20 error had been made, so when the error notice came in it
 21 was a contra-entry in suspense to the error that had
 22 already been recognised, if everything was --
 23 **Q.** If everything was working properly?
 24 **A.** -- going great. The S80, or IMPACT, introduced an
 25 automated process. So on the basis that data was being
 34

1 owns the requirements to make sure that the design
 2 remains consistent and gives a view on CR, change
 3 requests.
 4 **Q.** If we could look at page 30 of that document, and
 5 scrolling down slightly, the "Roles and
 6 Responsibilities" section, it says:
 7 "The responsibility for leading the detailed
 8 migration analysis lies with the Impact Business Change
 9 team - primarily Steve Grayston (Business Change
 10 Manager), Ann Clark (Back End), Ben Gildersleve
 11 (Counter), and Mark Kirton (Implementation)."
 12 So that was your business change team; is that
 13 right?
 14 **A.** I think it was wider than that but, given that the
 15 highest level of IMPACT was back end, so Ann Clarke, and
 16 at counter, Ben, yes.
 17 **Q.** You would work with these people to carry through the
 18 changes that had been designed; is that right?
 19 **A.** Yes. I mean, the -- fundamentally, you know, the
 20 conceptual design needs to be understood. For example,
 21 you know, counter, if you took counter, the front
 22 office, you need to understand what is changing. So
 23 what is expected, what needs to be done, in terms of
 24 process, eventually, so that you can define the right
 25 level of procedural documentation and the right level of
 36

1 training, and that behind that there is the right level
 2 of understanding in the support desk to support the
 3 people when this change is going through.
 4 You know, there's also, as part of that, an
 5 evaluation of what is needed at the point of migration
 6 from what happens today to what needs to happen
 7 tomorrow.
 8 Q. If we could turn to page 20 of this document, please.
 9 Scrolling down it says:
 10 "Preparation to Implement POL_FS."
 11 And it says:
 12 "The following activities are required ..."
 13 And lists a number of activities in terms of
 14 hardware and software implementation.
 15 Scrolling down, it says:
 16 "In POL-FS activities must be undertaken to load
 17 the start of the financial year opening balances from
 18 CBDB ..."
 19 What does that mean?
 20 A. Counters business database.
 21 Q. "... into POL-FS."
 22 And POL-FS is?
 23 A. That's SAP, I believe.
 24 Q. "This is in addition to any identified previous year
 25 closing balances and movements that need to be put into

1 a primary driver.
 2 Q. Not a primary driver but do you think it was a factor?
 3 A. Well, I think, you know, if it was envisaged -- and
 4 I can't say I'd have saw it anywhere, that it was
 5 envisaged that, as a result of IMPACT being implemented,
 6 that there would be a, you know, significant inflow of
 7 funds, I -- you know, possibly in somebody's mind
 8 somewhere that might have been a factor. But I can't
 9 say I saw that.
 10 Q. I want to ask you some questions about feedback from
 11 subpostmasters. You talk in your witness statement
 12 about feedback being obtained.
 13 A. Yes.
 14 Q. If we could turn up WITN0392100, please, and if we could
 15 turn to page 23. Looking that bottom of that page, at
 16 paragraph 60, it says:
 17 "Whilst I am unable to reference specific notes,
 18 or documents, I can confirm that user feedback was
 19 important to the IMPACT Programme team and that feedback
 20 would have been taken on board and acted upon where
 21 appropriate. The feedback would have included comment
 22 on User Interface such as screen workflow, colours,
 23 positioning on screen, understanding of language used in
 24 instructions. There would also have been feedback
 25 gleaned from users interacting with the testing team

1 POL-FS to create the correct starting position.
 2 "There is also an activity to address the position
 3 of the suspense accounts both centrally and locally
 4 particularly as the current 'unknown items' option will
 5 no longer be available to the branch. An exercise to
 6 cleanse suspense accounts in advance of implementing
 7 POL-FS is envisaged."
 8 So this is the process of cleansing the suspense
 9 accounts to move forward with the plan; is that right?
 10 A. Yes. I think "cleanse" -- my understanding in terms of
 11 the use of this term is it was envisaged that operations
 12 team, so the line management operationally, and the
 13 subpostmasters would be encouraged to deal with items in
 14 suspense. Because items were sitting in suspense,
 15 I believe, sometimes for an extended period of time.
 16 Q. That document can come down, thank you.
 17 Do you think the suspense account was removed
 18 because the Post Office desperately needed the money in
 19 the suspense accounts?
 20 A. No, I don't believe that was a primary driver for
 21 closing the suspense account. To me, it was an
 22 appropriate action to take if you were running true
 23 end-to-end processing. You didn't need or you shouldn't
 24 need the ability to manually post into an office's
 25 accounting position. So I don't believe it was

1 with the aim of reducing the risk of errors. Whilst
 2 I cannot provide any specific example I am sure that not
 3 all user feedback was accepted; for example if a user
 4 disagreed with a fundamental aspect of the concept, the
 5 business design, I believe that the overall business
 6 benefit to POL would have been the over-riding
 7 necessity."
 8 Could you explain a bit more about what you mean
 9 by that.
 10 A. Yes. The high level design and the conceptual design of
 11 what Post Office was attempting to achieve, was setting
 12 out to achieve, was signed off and agreed, and agreed
 13 between Post Office management and I believe with
 14 relevant stakeholder groups.
 15 Inevitably you get people who will actually
 16 disagree and challenge the fundamental conceptual
 17 design. And, you know, that's -- here is one example.
 18 It happened to me in other programmes.
 19 But, you know, what I take from that is that it's
 20 about explaining the benefits of the programme overall
 21 because, in isolation, somebody may be sitting there
 22 being asked to do something different and not
 23 understanding or realising the benefit to the
 24 organisation as an overall factor.
 25 So, you know, that's where people would express

1 their views, but that feedback would not necessarily be
 2 taken on board. However, what should be taken on board
 3 is that if there is a fundamental lack of understanding
 4 why this is being done, what the benefit is overall to
 5 the organisation, then, you know, business change should
 6 reinforce the reasons behind why the change is
 7 happening.

8 Q. So if a subpostmaster said, "I don't agree with the fact
 9 that suspense account is going to be removed", that's
 10 not something that would have been taken on board,
 11 because it's fundamental to the programme itself and the
 12 design of it; is that right?

13 A. It is. But I would expect, out of, you know, courtesy
 14 and the appropriate professionalism that, you know,
 15 a rounded response would be given to the person who'd
 16 raised the point.

17 Q. But it couldn't be changed? The IMPACT programme was
 18 what it was fundamentally, and feedback could be sought
 19 on more peripheral or user-based things such as the
 20 interface; is that right?

21 A. Yes.

22 Q. If we could turn up POL00038986, please. This is the
 23 IMPACT programme implementation plan for the
 24 S80 release. Can you help us with what this document
 25 is.

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1 who are reviewing documents like this understand the
 2 scope of their review because S80 was complex.

3 So we can all make comments about some of the
 4 technical aspects but if the technical aspect is not
 5 your domain, those comments wouldn't necessarily, you
 6 know, carry any weight.

7 Q. If we could turn to page 6, please, we can see there in
 8 the introduction it says:
 9 "The purpose of this document is to provide
 10 visibility and understanding to the IMPACT programme and
 11 relevant BAU domains ..."
 12 "BAU"?

13 A. Business as usual.

14 Q. "... of a high level business implementation plan for BT
 15 and POL-FS and the main activities for the initial
 16 pre-implementation stage. This document is largely
 17 derived from the migration strategy and meetings held
 18 with the business area representatives. It outlines the
 19 high level implementation approach that will govern and
 20 guide a lower level BT and POL-FS implementation plan."
 21 If we move to page 7, scope, it says:
 22 "The high level plan scope includes ..."
 23 So when it talks about the "high level plan",
 24 these are the things that are going to happen as a kind
 25 of headline point; is that right?

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1 A. Well, I would expect it to include all the details of
 2 how S80 would have been implemented, as it says, at
 3 a high level. I'm not sure what the detail is after
 4 that.

5 Q. The difference between an implementation plan and
 6 a migration plan?

7 A. Yes. Well, migration is part of the overall
 8 implementation.

9 Q. Okay. But they are two distinct things; you would
 10 expect to have separate plans for them, would you?

11 A. Yes, I would expect the overall implementation plan to
 12 highlight the migration perspective and then, as you
 13 drill down into detail, that you get a migration plan
 14 and processes, et cetera, as you go into further levels
 15 of detail.

16 Q. We can see here that you are a reviewer of this
 17 document.

18 A. Yes.

19 Q. So as a reviewer, does that mean that you would have had
 20 input into it or you would have had a look at it at the
 21 time before it was finalised? How would that have
 22 worked?

23 A. Yes. As a reviewer, yes, I was expected and required to
 24 provide feedback from a business change perspective and,
 25 you know, I think it's always important that the people

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1 A. Yes, yes.

2 Q. And we can see it sets out a number of things that are
 3 going to happen, and if we look at paragraph 9, it says:
 4 "Distribution of materials to branches and the
 5 NBSC, including training and operational instructions."
 6 Number 10:
 7 "Development of branch error scenarios and scripts
 8 for the NBSC."
 9 Number 12:
 10 "Training of NBSC in types of calls and changes
 11 to BT."
 12 After IMPACT and after the S80 release, the NBSC
 13 was going to be extremely important, wasn't it?

14 A. Yes, NBSC was extremely important.

15 Q. Before but even more so after these changes?

16 A. At any release and any change, there is a curve of
 17 increased volume calls, et cetera. So, yes, the support
 18 services, the support desks, should expect to receive an
 19 increased volume of calls, yes.

20 Q. But over and above, surely, what you would normally
 21 expect with a release because, as we were previously
 22 discussing, this is now the way that you can dispute
 23 what Horizon is showing you, right?

24 A. Yes.

25 Q. So on the long-term you would expect not just a peak

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1 after the release but a peak going onwards, wouldn't
 2 you?
 3 **A.** Correct. I mean, that's part of the volumetric analysis
 4 that is undertaken for support services. You know, what
 5 is the baseline position, how is that baseline likely to
 6 change, and what is the curve or what is the BAU wave of
 7 increased calls likely to look like?
 8 **Q.** Do you remember that being something that was considered
 9 or thought about carefully at the time?
 10 **A.** I believe it was, yes.
 11 **Q.** Do you think that, all things considered, the IMPACT
 12 programme was a success in that it met its objectives?
 13 **A.** I don't remember seeing a closure report. I might be
 14 wrong about this, but I can't recall seeing a closure
 15 report or closure analysis. But in terms of the points
 16 that you have gone through and the implementation that
 17 took place, I believe it was -- you know, it achieved
 18 what it set out to achieve at the headline level.
 19 **Q.** Did you investigate with the NBSC what the impact of the
 20 IMPACT programme was or how those calls increased over
 21 time?
 22 **A.** I think, you know, the approach -- which, you know, as
 23 far as I'm concerned is a standard approach -- is that
 24 the implementation takes place and there is a handover
 25 at each branch or from the programme to business as

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1 there may be a legitimate business reason. But sitting
 2 here, knowing what I know, it doesn't sound appropriate.
 3 **MS KENNEDY:** Thank you, Mr Grayston. Those are all my
 4 questions.
 5 I'm just turning to see if any of the Core
 6 Participants have questions. I can see Mr Stein does.
 7 **MR STEIN:** Sir, there's a matter that has been brought to my
 8 attention in an email that I would like to take some
 9 instructions on. It is now 11.15. I wonder whether
 10 I could use this time and ask for 20 minutes to have
 11 a break.
 12 **SIR WYN WILLIAMS:** Yes, certainly.
 13 **MR STEIN:** It may be I will have no questions but I just
 14 want to make sure.
 15 **SIR WYN WILLIAMS:** That's fine.
 16 Is anyone else intending to ask any questions,
 17 just so that I know?
 18 **MS KENNEDY:** Yes, Ms Patrick and Ms Page.
 19 **SIR WYN WILLIAMS:** So what is it now? 11.15 or thereabouts?
 20 **MS KENNEDY:** Yes. 11.30?
 21 **SIR WYN WILLIAMS:** 11.30, Mr Stein, unless you send
 22 a message that you need a little longer, all right?
 23 **MR STEIN:** Thank you, sir.
 24 **MS KENNEDY:** Thank you, sir.
 25 **(11.16 am)**

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1 usual, and NBSC in the early stages is supported by the
 2 programme. So, yes, we would have been looking at or
 3 should have been looking at the calls being raised with
 4 NBSC and the Horizon System Helpdesk. There should be
 5 analysis going on to see if there is an improvement
 6 required in training or communication or what are we
 7 seeing, yes.
 8 **Q.** At this time, were you aware that Fujitsu were able to
 9 access the data generated by the counter remotely and
 10 input into it?
 11 **A.** No, and I -- you know, this is something that, you know,
 12 I've seen referenced, but at the time, no. To me, it
 13 just seems troubling. Perhaps there was a full -- there
 14 is a full audit log but giving somebody access to the
 15 back end to inject data, you know, I would be very
 16 uncomfortable with that.
 17 **Q.** If you had known that at the time, how would that have
 18 impacted on your view of how appropriate it was to place
 19 such stock on Horizon data?
 20 **A.** Well, it would be extremely concerning. You know, you
 21 cannot -- I mean, I don't -- if there is a -- I've not
 22 seen the reasoning behind it, so if there is
 23 justification behind it and there is visibility and it
 24 is auditable and it is clearly articulated as a record
 25 somewhere of what was done, who did it and why, then

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(A short break)**(11.30 am)**

MS KENNEDY: Thank you, chair. I believe Mr Stein has some
 questions.

Questioned by MR STEIN

MR STEIN: Sir, very grateful for the time. It allowed me
 just a couple of minutes to gather my thoughts and take
 instructions.

Mr Grayston, I represent a large number of
 subpostmasters and mistresses. I've only got couple of
 questions that relate to your evidence you have given
 today.

You've spoken to Ms Kennedy about the branch
 suspense accounts and about the IMPACT programme that
 then, as a result of that programme, removed the
 suspense accounts, okay. You have also discussed with
 Ms Kennedy the fact that at one stage within the branch
 suspense accounts that it reached a surprising amount of
 money, it went up to about 10 million. Okay?

Now, help us, first of all, with what you believe
 that £10 million in those branch suspense accounts
 meant. What did it represent?

A. I wasn't sure. The context of knowing about this
 2 million to 10 million is unclear to me. It wasn't --
 it didn't come to me formally but somewhere it came up.

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1 Now, for it to go from 2 million to 10 million in
 2 suspense means that there's errors that were being
 3 posted to suspense. Now, I don't know what those errors
 4 were but that -- the purpose -- my understanding was
 5 analysis was ongoing.
 6 Q. When you say "errors" -- if we can just tease this out
 7 gently, when you say "errors" do you mean errors within
 8 the Horizon System, errors being made by, in your mind,
 9 subpostmasters and mistresses, other reasons to account
 10 for and lead to errors and shortfalls?
 11 A. Any or all of those, yes.
 12 Q. Just pursuing this as far as we can, you've answered
 13 Ms Kennedy's questions about this, but what was done
 14 that you can recall now to look into the difference --
 15 those different possibilities?
 16 A. I do not know. That's the position.
 17 Q. All right. Can we then look at the flip side, which is
 18 this: we reached the stage whereby the IMPACT programme
 19 suggests that the ability to put the error or the
 20 shortfall into the branch suspense accounts was
 21 eliminated. Now, what happened to that money? Now,
 22 it's not real money or is it?
 23 A. Sorry, which money?
 24 Q. The 10 million in the suspense accounts. Now, is that
 25 real money in your mind or is it notional money?

1 deal with each of those factors, is the way that I would
 2 expect it to be approached.
 3 Q. The way that you're speaking about this is with
 4 considerable amount of caveat. You're saying that,
 5 first of all, you accepted a point made by Ms Kennedy as
 6 to the possible makeup of the money, the 10 million.
 7 A. Yes.
 8 Q. Secondly, you believe that the finance will have dealt
 9 with it. Do you have any actual direct knowledge of
 10 what happened?
 11 A. No, I don't, I don't. I'm sorry.
 12 Q. So is one possibility that the subpostmasters and
 13 mistresses were pursued for that amount of money as
 14 debt?
 15 A. Yes. It's a possibility, yes.
 16 **MR STEIN:** Excuse me for one second.
 17 Thank you, sir.
 18 **Questioned by MS PAGE**
 19 **MS PAGE:** Just a few short questions from me. It's
 20 Flora Page, also representing some of the
 21 subpostmasters.
 22 You've told us in your statement that you weren't
 23 able to sort of put your hand on any particular user
 24 feedback although you know some was created. I can take
 25 you to that if you like but --

1 A. Well, if I refer back to a document that Ms Kennedy
 2 showed me, when she talked about 10 per cent being real
 3 debt, it could be that some of that 10 million was
 4 related to discrepancies or potential debt arising from
 5 timing discrepancies in -- as data flowed through the
 6 system.
 7 Q. Right. That's 10 per cent?
 8 A. Well, I don't know. That's one possible constituent of
 9 10 million.
 10 Q. That's leaving 9 million. The other 9 million --
 11 A. No, I think it's the other way round. I think it's --
 12 if 10 per cent is debt and 90 per cent is timing,
 13 then --
 14 Q. I see. So when this branch account -- when this ability
 15 for the branches to put money into the suspense accounts
 16 was eliminated, what happened within the accounting
 17 system of POL to that figure? It can't just be
 18 eliminated, can it?
 19 A. Well, it can't just be eliminated, but the purpose of,
 20 you know, where finance is, if that is an amount of
 21 money that is deemed owed, or debt, then the analysis
 22 must show what has caused -- what is it that's causing
 23 it. It won't be -- I'm positive that it won't be one
 24 single factor, there will probably be a number of
 25 factors involved in it and finance would then seek to

1 A. Yes.
 2 Q. Yes? Do you have any idea of why it's not been possible
 3 to locate that at this stage?
 4 A. No. But, you know, all I can say is that there should
 5 have been a document library and an archive created that
 6 contains the full set of documents relating to the
 7 impact from start to finish, business change included.
 8 Q. Would that document library have potentially included
 9 records of board papers or anything of that nature?
 10 A. Yes.
 11 Q. Possibly even records of important meetings at which it
 12 was discussed?
 13 A. Yes. You know, it's standard practice that, you know,
 14 a document library is created and then held, you know,
 15 for a considerable period of time.
 16 Q. So it's slightly unusual, is it, that we find ourselves
 17 in a situation where we've got some papers but we don't
 18 seem to have any meeting notes, we don't seem to have
 19 any of your user feedback, in other words that what
 20 we've got is rather patchy?
 21 A. Yes. I think that's -- you know, although there's
 22 a long period of time between today and what we're
 23 talking about, you know, it's unfortunate that there
 24 isn't the record there to help the conversation that
 25 we're having.

1 Q. Thank you.
 2 You've mentioned that you think that there should
 3 have been -- whether there was or not we don't know, but
 4 there should have been something of a report into this
 5 fivefold increase in the suspense accounts. Who do you
 6 think would have been responsible for that?
 7 A. It would sit in finance, with the finance team, to
 8 understand, investigate, analyse and produce appropriate
 9 outputs.
 10 Q. So perhaps Graham Corbett sitting at the top of that?
 11 A. Yes. I can't -- you know, I can't remember the names,
 12 the particular names, at this point in time, but, you
 13 know, senior finance managers and, in particular, those
 14 that worked with the suspense account, yes.
 15 Q. Yes. Then you've told us also that you would envisage
 16 a report into the types and numbers of criminal
 17 prosecutions for discussion at Post Office management
 18 level. Again where would the responsibility for that
 19 sit and what managers would you have envisaged having
 20 those sort of discussions?
 21 A. Well, the investigation team, as a function, was at one
 22 point in time with Royal Mail Group, but then each of
 23 the businesses took on investigation in-house by taking
 24 some people from Group. So there was an investigation
 25 team. In terms of organisational structure I'm not sure

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1 in a very large number of cases, perhaps not by any
 2 means a majority but a significant number of cases.
 3 Looking back, do you think that as S80 was
 4 designed and created, alongside it, and perhaps not
 5 fully intentionally but certainly at some stage
 6 intentionally, there was a sort of development of a myth
 7 that Horizon cash account data was absolutely reliable?
 8 A. Myth ... I think business decisions have to be based on
 9 an understanding that what is coming out of the system
 10 is accurate and reliable. If at a management level
 11 there is a suspicion that it may be flawed in some way
 12 then that causes or should cause, you know, a lot of
 13 thought and creation.
 14 Myth -- I'm not sure about "myth" but ...
 15 Q. If there was perhaps an unwillingness to sort of
 16 investigate those possibilities?
 17 A. Yes, I think -- you know, this is something that, having
 18 listened to some of the testimony, you know, they --
 19 stepping back and looking at what's going on, making use
 20 of the various types of different view or data that
 21 would exist in the business, may have helped. I don't
 22 know if that took place or not. But, having heard what
 23 I've heard, you know, in the lead up to being here
 24 today, you would expect there to be some stepping back
 25 and looking.

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1 whether the investigation team for Post Office Counters
 2 would have sat in finance or separately somewhere in
 3 operations, but, you know, if you were looking at
 4 weaknesses in your systems which are resulting in
 5 investigations taking place, then there is analysis that
 6 takes place at a national level to understand how many,
 7 what time, what amounts, so that it gives you the
 8 opportunity to close out and take rectification steps
 9 where, you know, there are weaknesses.
 10 Q. Did you ever see a document of that nature?
 11 A. Not -- no. Maybe in the early '90s, at a group level,
 12 because, of course, when you're looking at the situation
 13 in the businesses, you do need to understand what's
 14 going on in terms of investigations.
 15 Q. But you don't believe you saw one during the period that
 16 the IMPACT programme was being developed --
 17 A. Certainly not, no.
 18 Q. No. But you believe one should have been done or
 19 something along those lines?
 20 A. I can only say that I would expect that the people
 21 involved in that would be doing that. They should be
 22 doing that, yes.
 23 Q. Just finally, you have very fairly acknowledged that the
 24 IMPACT programme required Horizon cash account data to
 25 be reliable and, of course, we know now that it wasn't

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1 **MS PAGE:** Thank you. Those are my questions.
 2 **Examined by MS PATRICK**
 3 **MS PATRICK:** Good morning, Mr Grayston. My name is
 4 Angela Patrick and again I act with Mr Moloney and
 5 Huddell Solicitors for another group of subpostmasters.
 6 I don't have a lot of questions for you but
 7 Ms Kennedy has asked you a number of questions about
 8 your involvement in Horizon during the development
 9 stages, testing and acceptance, and during the rollout.
 10 I don't want to go back quite that far but I want to
 11 look and ask a few questions about the end of the
 12 rollout, so before IMPACT.
 13 A. Right.
 14 Q. I want to look at two documents and ask a few questions
 15 about them. First is POL00104602.
 16 Can you see that, Mr Grayston?
 17 A. Yes, yes.
 18 Q. We can see that it's an email headed "Electronic memo",
 19 from Dawn Howe to Keith Baines, sent on
 20 6 September 2000. Can you see that?
 21 A. Yes, I can, yes.
 22 Q. It's headed "Horizon NRO Close Down Reporting".
 23 "NRO", would that be national rollout?
 24 A. It would, yes.
 25 Q. If we scroll down a little -- we don't need to look at

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1 the substance of that email but we can see it's got
 2 a second email attached to the bottom part of that, and
 3 that's an email from Don Grey copied to a number of
 4 people including, I think, yourself. You can see
 5 Steve Grayston there; would that be you?
 6 **A.** Yes.
 7 **Q.** This was one that was sent on 5 September 2000, and we
 8 can see again same title but it says "Initial draft for
 9 comment please ... confirm requirements within NRO
 10 Board".
 11 So this is a document being sent to you for
 12 comment; is that fair?
 13 **A.** Yes.
 14 **Q.** If we can go over the page we can see what the document
 15 is, and we can see:
 16 "This paper documents the process to be adopted by
 17 the Horizon Implementation Team to close the ...
 18 National Roll Out project.
 19 "... Issued for initial comment."
 20 So were you being asked here to comment on the
 21 plans for close down reporting, so -- or how the close
 22 down reporting for the end of the rollout project was to
 23 be conducted?
 24 **A.** Yes, it was put together by Don Grey and, at that point
 25 in time, I think I was working for Douglas and part of

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1 So this is some time on from the initial email.
 2 **A.** Yes.
 3 **Q.** The heading is "Project Implementation Review -- Horizon
 4 National Roll Out".
 5 Is it likely this was a draft of the review that
 6 you may have seen for your input?
 7 **A.** I don't know. Documents -- there should be one -- or
 8 I would expect one report that Don was pulling together.
 9 There may be different takes on material in that report
 10 for different audiences.
 11 **Q.** If we can turn to page 10 -- and there are appendices or
 12 annexes to this document, but if we look at page 10 to
 13 start with it may help with your memory. We can see
 14 appendix A is "Post Implementation Review of Field
 15 Management", and if we scroll to the bottom of that page
 16 there's a distribution list, which you aren't on, but if
 17 we can scroll over to page 13, there's an
 18 acknowledgments list at bullet point 2.
 19 We can see there the second paragraph main
 20 contributors include Don Grey, Douglas Craik,
 21 Steve Grayston. So is it likely that you would have
 22 been a contributor to at least part of this review
 23 process?
 24 **A.** Yes, I mean, clearly from paragraph 1 what you have got
 25 is inputs from the field teams, the four field teams,

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1 Don Grey's team, yes.
 2 **Q.** So you were part of the Horizon Implementation Team for
 3 the rollout?
 4 **A.** Yes.
 5 **Q.** Yes, and involved in conducting the review or part of
 6 it?
 7 **A.** Yes.
 8 **Q.** Thank you. This may be very basic but this was how the
 9 Post Office was proposing to learn any pertinent lessons
 10 they could from how the rollout had gone?
 11 **A.** I'm not sure in terms of scope whether it talked about
 12 lessons learnt. I mean, I'd need to sort of have a look
 13 at more of the document, but yes, I mean, it should
 14 refer back to lessons learned and, you know,
 15 opportunities for improvement, et cetera.
 16 **Q.** We don't need to go into the detail of this document
 17 because it's planning for how the review would be
 18 conducted. I'd like to look at the second document that
 19 I'd like to ask some questions about, and it's
 20 POL00104482, please.
 21 We don't have a cover email for this but I can see
 22 on the top right-hand side, can you see that,
 23 Mr Grayston, there's a date?
 24 **A.** Yes.
 25 **Q.** And it says "Draft", and it seems to be 5 April 2001.

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1 and the management of those four field teams.
 2 I recognise all those names. Paragraph 2 is the head
 3 office team, yes.
 4 **Q.** Okay. As you said, there are some things that would
 5 have been within your domain, others that wouldn't, but
 6 you may have been involved in reviewing different
 7 documents. You said that to Ms Kennedy earlier.
 8 **A.** Yes.
 9 **Q.** I don't propose to go through all of this document.
 10 There are two issues I want to look at to see if you can
 11 help the Inquiry. Whether you have seen it or not it
 12 may refresh your memory if we look at it as we go
 13 through.
 14 If we turn to page 5, the first issue that
 15 I wanted to ask some questions about arises there. We
 16 can see there's a heading there headed bullet 5, and it
 17 says "Performance - Operational."
 18 Can you see that, Mr Grayston?
 19 **A.** Yes.
 20 **Q.** I want to scroll down to the sixth bullet point --
 21 sorry, the sixth point on that page, I apologise. It's
 22 "Performance - Technical". It's actually the next
 23 section down. Thank you for your patience.
 24 We can see the section there reads:
 25 "Technical oversight and validation of ICL Pathway

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1 activities was almost non-existent compared with the
 2 preceding live trial and development phase. Although
 3 this was not really a problem it is an area that should
 4 not be overlooked either in the Horizon maintenance
 5 phase or in future projects."
 6 I think you can see immediately below there it
 7 says a full lessons learned report was going to be at
 8 appendix A, which we just looked at, and appendix B.
 9 If we turn down to page 6, please, we can see some
 10 recommendations there, and 9.1 is headed "Supplier
 11 issues", and I want to look at bullet point 2, which
 12 reads, if we read it together:
 13 "We should never again put ourselves in the
 14 position of dependence on either a sole supplier (or,
 15 indeed, supplier dominated project progress information)
 16 without first establishing a defined and adequate
 17 contingency. At the outset we should assure customer
 18 pre-eminence with any future supplier who must commit to
 19 identify, agree and deliver to our requirements
 20 including detailed performance metrics and integrated
 21 reporting structures. Furthermore, any future supplier
 22 must empower their local field teams to mirror the
 23 responsibilities we invest in our people."
 24 Then if we can look at the third bullet it says:
 25 "Improving the way we manage our chosen supplier;
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1 contract.
 2 So yes, I mean, I think this particular point was
 3 about implementation. I understand it. I do remember
 4 it.
 5 Q. I just go back to that phrase that was used on page 5.
 6 We don't need to turn it back up again, but:
 7 "Technical oversight and validation of ICL Pathway
 8 activities was almost non-existent compared with the
 9 preceding live trial and development phase.
 10 A. Yes.
 11 Q. Whether it's implementation or not, the conversation
 12 there is about technical oversight and validation --
 13 A. Of implementation.
 14 Q. -- being non-existent. Then there's a reflection,
 15 continuing on, on "Improving the way we manage our
 16 chosen supplier", and I think that's forward looking for
 17 new projects, but can you recall if there was any
 18 concrete plan for change in the relationship between POL
 19 and Fujitsu to improve technical oversight and
 20 validation going forward?
 21 A. Well, the technical oversight and validation was around
 22 the steps that were required to undertake
 23 implementation, which was effectively, you know,
 24 a migration to the new world and so, to answer your
 25 question, no, because there would not be another
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1 having more than one route without proper technical
 2 backup can make us look both unprofessional and
 3 vulnerable."
 4 I simply want to ask -- I don't know if this
 5 refreshes your memory of this at all but can you recall
 6 at the time this review at the end of the rollout was
 7 being conducted, was there a recognition within POL that
 8 POL had been very reliant on Fujitsu in the development
 9 and also during the rollout of Horizon?
 10 A. Well, in terms of what you've shown me and the comment
 11 that you have referred me to, this was about
 12 implementation, not about Horizon more generally. So on
 13 the point that I think is being made here in
 14 recommendations, ICL Pathway had subcontracted various
 15 pieces of work to different organisations and that led
 16 to difficulties through -- and challenges through the
 17 implementation.
 18 In terms of, I think, your question, which I think
 19 is wider, the reliance on ICL Pathway, yes, Post Office
 20 Limited -- Counters Limited was reliant on ICL Pathway
 21 understanding the nature of their role and executing it
 22 appropriately and I think -- sorry, I just add to that,
 23 I think you've already seen, and I've seen in the
 24 material, concerns over visibility and openness and the
 25 nature of the contract and the limitations of the
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1 technical rollout or implementation of a similar type
 2 with ICL Pathway. That activity had been done.
 3 However, for Post Office's purposes, you know,
 4 should we be working with another supplier (and we had
 5 a large banking programme, Post Office Card Account, for
 6 example), that the learning point about how we manage
 7 implementation, those points should be taken on board
 8 for future programmes.
 9 Q. Of course, I think you were continuing to work with
 10 ICL Pathway, and thereafter Fujitsu, on what we start
 11 calling the "business as usual" operation of Horizon.
 12 A. Yes.
 13 Q. And any other projects connected with Horizon that would
 14 be conducted by Pathway and then Fujitsu; is that fair?
 15 A. Correct, yes.
 16 Q. I'm going to leave that point and go to the second point
 17 and it's to look at some of the detail in the lessons
 18 learned in this document.
 19 If we could turn to page 30 to start, there are
 20 a few points I'd like to look at to see if they are
 21 consistent with your recollection of the review at the
 22 end of rollout. If we look at appendix B and we start
 23 at the bottom of this page, page 30, what I want to look
 24 at runs over the page on to page 31. If we can see the
 25 very last paragraph:
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1 "The overall strategy towards training was not in
2 tune with the contractual relationship that exists
3 between Post Office network and subpostmasters. The
4 requirement for subpostmasters and their assistants to
5 be pass a PSA (Personal Standard Assessment) after
6 training caused some inconsistent anomalies within the
7 network in terms of offices reaching the minimum
8 training compliance to enable migration to be completed.
9 The lack of a proactive approach by Territories in this
10 area. Detailed information on PSA failures and
11 provision of training material from ICL Pathway have
12 exacerbated the problem."

13 On training, you've said a little to Ms Kennedy
14 already this morning about your recollection of
15 training. Is that something consistent with your
16 recollection of concerns around training during the
17 rollout?

18 **A.** Well, even prior to rollout -- first of all, you know,
19 training was part of the programme that I think the
20 Inquiry's heard from one of my colleagues, Trevor
21 Rollason. But, as a team, head office or regional, we
22 were getting feedback on what was, you know, the
23 struggle.

24 Yes. I mean, I think the work done pre-rollout to
25 improve training, which was AI 218 I think, was seen as

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1 The training delivered by ICL Pathway was poor in terms
2 of the instructors had little or no knowledge of
3 Post Office procedures."

4 Again, just to be absolutely clear, is that
5 consistent with your recollection as to the conclusions
6 of the Post Office at the end of rollout in 2001?

7 **A.** Yes, although looking at it today I think that there
8 probably would need to be a reflection on what was done
9 to boost that training but, you know, if I looked at it
10 in a different way, Peritas (I think that was their name
11 at one point in time) who had been appointed to run the
12 training, didn't have a Post Office background, didn't
13 understand all of the processes associated with it. So
14 for Peritas, or the supplier of training, to come in and
15 run good training courses, even with time and good
16 material, was again, I think, a learning curve on their
17 side.

18 I think there was a reflection that the cash
19 account training wasn't comprehensive enough and,
20 through AI 218 and the negotiation that I think Bruce
21 McNiven was involved in, that was improved. That was
22 improved.

23 **Q.** But this AI 218 takes us to acceptance and rollout which
24 starts in January 2000. This is being drafted in
25 May 2001.

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1 extremely helpful. But nevertheless, with a user
2 population so large, there were people who could not
3 cope with Horizon and they failed a test that had been
4 introduced to assess competency.

5 **Q.** We see just the paragraph below that one. It continues:

6 "The policy for 'out-of-hours' transactions is at
7 best a stop gap. There are [key] client and account
8 team issues that need to be addressed."

9 This was being written in maybe 2001 at the end of
10 the rollout. Can you recall what the key client and
11 account team issues that still needed to be addressed
12 were?

13 **A.** No. It would have been clear at the time but
14 out-of-hours transactions were used on occasions for
15 certain product types but I can't remember, in the
16 context of what's said here, what the implication was.

17 **Q.** Okay. If we can go down to page 32, please, and I want
18 to look at bullet point 3.4, please. Can you see that,
19 Mr Grayston?

20 **A.** Yes.

21 **Q.** Thank you. You can see there -- I don't want to look
22 that whole thing but the third paragraph down there is
23 an entry which says:

24 "Cash account training was not comprehensive
25 enough within the training delivered by ICL Pathway.

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1 **A.** Yes.

2 **Q.** It's being recorded here that the training on the cash
3 account had not been comprehensive enough. Was that, in
4 your recollection, the view of Post Office in May 2001?

5 **A.** Sorry, I wasn't clear. I think in my mind this
6 reflection should have had two elements to it that it
7 absolutely wasn't and that there was an intervention as
8 a result of AI 218 that had improved things. It does
9 not say that here and your interpretation, you know, is
10 reasonable from what is said here.

11 But the quality of the training that was given, I
12 believe was deemed to be adequate and the reason I say
13 that is that there were four implementation teams
14 nationally, and the head office team had worked with the
15 regional teams through the lifetime of this programme,
16 and the regional teams represented the business
17 operations around the country and also reflected the
18 needs of the programme in implementing in the various
19 parts of the country.

20 If that feeling as expressed here was so black and
21 white, then it would have been stopped. The regional
22 management of Post Office Counters Limited would have
23 stepped in. So I think -- in my mind, you know, I am
24 taking an interpretation that it wasn't good enough and
25 it improved. There was nothing coming out from the

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1 implementation teams or regional management that said
 2 every week this training is not could enough, it is not
 3 good enough. So you know that's my thought on this.
 4 Q. But that's not reflected in the draft that we have here?
 5 A. As I say, your interpretation of what's said here, yes.
 6 Q. If we can go over to 3.6, which is over the page on
 7 page 33, it might help elaborate on this thinking.
 8 Can you see that now, Mr Grayston? I think it's
 9 come up. At point 3 6, which deals with pre and post Go
 10 Live support --
 11 A. Yes.
 12 Q. -- and it says:
 13 "More in-depth training for those people who
 14 supported second, third and fourth balance support
 15 especially around suspense account entries. The
 16 scheduling of Retail Network Manager was not consistent
 17 with instances of more than one arriving at an office to
 18 offer support. The allocation of support for balances
 19 worked better when the scheduling was undertaken by the
 20 cluster groups. Offices were given the impression that
 21 they would have a trained person with them for the first
 22 balance, far too many did not have anyone leaving them
 23 to 'flounder' with an inadequate balancing guide."
 24 If we scroll down further to 3.8, 3.8 deals with
 25 the documentation given to subpostmasters and it says:

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1 level of support from the retail line; so business as
 2 usual retail operations as the implementation team was
 3 moving on.
 4 So there was no intention of subpostmasters or any
 5 of their staff being intentionally left to flounder.
 6 Q. I wasn't asking about what was intended -- I apologise
 7 if there's any confusion -- simply that the reflection
 8 here, looking back on what could be learned from the
 9 rollout process, in May 2001 it was being recorded here
 10 that the Post Office was recognising that some
 11 subpostmasters had been left to flounder.
 12 A. That's what -- yes, that's what it says.
 13 Q. Thank you. I have one last question. If we could look
 14 at page 34, please, at the bottom and I want to look at
 15 3.10 which is headed "other". Can you see that,
 16 Mr Grayston?
 17 A. Yes.
 18 Q. Thank you. This section starts:
 19 "The helplines are not seen as an effective
 20 support to the network, there seems a lack of knowledge
 21 and a reluctance to pass to a higher level for
 22 resolution.
 23 "Installing up to the 8th December was a mistake.
 24 "The number of errors generated post Go Live is
 25 directly linked to poor cash account training, an extra

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1 "In the latter stages of the project changes
 2 arising from revised documentation have been deployed
 3 before the documentation had been signed off.
 4 Operational instructions and balancing guides were
 5 excellent, the quick reference cards poor as were the
 6 arrangements for CSR+. The distribution of
 7 documentation on the whole was poor with a number of
 8 offices receiving their balancing guides well after
 9 their Go Live."
 10 It goes on that the diagrams in the Horizon user
 11 guide were not well accepted as it contained too many
 12 flow charts, and it says some more about training.
 13 Coming back to your understanding of the position
 14 of subpostmasters during the rollout, was this the
 15 reflection of the implementation team at the end of the
 16 rollout looking back that some SPMs, some
 17 subpostmasters, had been left to flounder?
 18 A. Well, from the position of the implementation processes
 19 and the role of the HFSO, which I knew because I'd been
 20 involved in the design of that role, it was an agreed
 21 process that, at the point of implementation and
 22 migration, the Field Support Officer would guide the
 23 manager and staff through the process and would be there
 24 at the first cash account after implementation and that
 25 subsequent cash accounts, if necessary, would have some

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1 half-day should have been allowed.
 2 "The legacy left due to the migration use of the
 3 suspense accounts needs to be resolved.
 4 "The rollout plan appeared to take no account of
 5 office size or pressure periods, this operational
 6 information should be included within the scheduling
 7 process.
 8 "Overall the size of the project was immense and
 9 has been a success which is mainly due to attention to
 10 detail, focus, meaningful reviews and a lot of hard work
 11 by so many people."
 12 I have a few questions about this.
 13 **SIR WYN WILLIAMS:** I thought you only had one, Ms Patrick.
 14 **MS PATRICK:** It's one point, sir, but it's about 3.10 which,
 15 as you can see, covers a lot of detail.
 16 **SIR WYN WILLIAMS:** I'm slightly concerned that we are
 17 revisiting Phase 2 exclusively in this part of your
 18 question and I'm not sure to what extent I want to do
 19 that; but, okay, one last point.
 20 **MS PATRICK:** Thanks, sir.
 21 We're at the end of the rollout. Is this an
 22 understanding that at the end of the rollout at this
 23 point, May 2001, Post Office was acknowledging that the
 24 helplines were not seen as an effective support to the
 25 network?

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1 A. Well, that's what it's saying.
 2 Q. Thank you. Ms Kennedy's already highlighted some
 3 problems would be problems that were flagged by
 4 subpostmasters in their branches.
 5 A. Yes.
 6 Q. Were helplines reluctant to pass up to a higher level
 7 for resolution when a problem got to them?
 8 A. I think you would need to speak to the Helpdesk
 9 management. They shouldn't. It weakens and devalues
 10 the purpose of a helpdesk or a helpline if the
 11 appropriate action isn't taken in terms of escalation.
 12 Q. You see there there's a number of errors being generated
 13 post Go Live. Is that consistent with your
 14 recollection?
 15 A. I think there was a recognition that there were some
 16 errors as people were learning to use the system, yes.
 17 But there was no feedback that I can recall from the
 18 field teams and operational management that the level of
 19 challenge was so significant as to undermine the
 20 continuation of rollout.
 21 Q. So here at the end of rollout in May 2001 the errors are
 22 being attributed, it says "directly linked", to poor
 23 cash account training. Is that consistent with your
 24 recollection?
 25 A. I don't know. The author presumably, or whoever wrote

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1 here. The technical oversight was about implementation,
 2 technical aspects of implementation, infrastructure,
 3 hardware, software, software failures, and aspects of
 4 that oversight for implementation.
 5 If you're asking me the about joining the dots in
 6 a more general sense, there were challenges, there were
 7 discrepancies and was anybody stepping back and looking
 8 at this overall, I don't know that there was.
 9 **MS PATRICK:** Thank you, Mr Grayston. We don't have any more
 10 questions for you. Thank you, sir.
 11 **SIR WYN WILLIAMS:** Thank you everyone. And thank you,
 12 Mr Grayston, for coming to give evidence and answering
 13 the questions put to you.
 14 So is that it for today, Ms Kennedy?
 15 **MS KENNEDY:** Yes, Chair. We return tomorrow with Mr Shaun
 16 Turner and Ms Anne Allaker.
 17 **SIR WYN WILLIAMS:** See you in the morning. Goodbye.
 18 (12.17 pm)
 19 (Adjourned until 10.00 am the following day)
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1 this particular point, would have had the analysis to
 2 create that linkage.
 3 Q. Just as one of the individuals that were involved in the
 4 team putting together this review, we've already looked
 5 at the acknowledgement, the reference to non-existent
 6 technical oversight and validation during the
 7 implementation process. Did anybody involved in the
 8 review, in your recollection, consider whether these
 9 errors that were arising post Go Live might not be
 10 attributable only to training but to problems with the
 11 technology itself?
 12 A. Yes, that's a very good question. At the time -- at the
 13 time -- you know, I think the working assumption was
 14 that the system was reliable and robust and producing
 15 outputs that could be trusted, and therefore the
 16 reflection of cash account or training is what you see
 17 here. Whether that was, you know, an assumption that
 18 was appropriate is now very questionable.
 19 Q. This is the last question: if anybody in your team or
 20 anybody else in POL at all, maybe involved in this
 21 review or not, can you recall if anybody joined the dots
 22 or tried to join the dots between a lack of technical
 23 oversight and validation and continuing problems with
 24 the cash account?
 25 A. Sorry, I just need to take you back to your linkage

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