

Witness Name: David Gordon Ogleby

Statement No.: WITN05350100

Dated: 15/2/23

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF DAVID GORDON OGLEBY

I, David Ogleby, will say as follows:

1. I started employment with Post Office Ltd at Sunderland branch post office in 1994, on a “casual” employment basis initially, as a counter clerk. I was then offered a part time contract to work at the branch after a few months. I also did a staff supervisory role there from time to time, on a rotational basis, along with some other colleagues of the same grade as me. For a few months from 2004 to January 2005 I worked as an acting assistant branch manager at Chester le Street branch post office. I then moved onto a full-time contract with POL in 2005 when I joined the post office network field training team. This team was then merged with the post office network audit team in 2008. During the latter part of my time in the training team, and throughout the time when we had merged with the audit team, I performed the role of Field Team Leader, responsible for leading a team of trainer/auditors based over a particular geographical area. I then moved on to the POL Network Transformation Program at its inception in early 2012, carrying out two different roles at

different times within the NT program, until leaving Post Office Ltd under voluntary redundancy terms in September 2016. I am currently working as a civil servant, employed by the Department for Work & Pensions.

2. I first started using the Post Office Horizon IT system when it was rolled out across the Crown post office network whilst I was a counter clerk at Sunderland Crown office. I continued to use the Horizon system when in the training field team, when training and supporting sub-postmasters (SPMs), as well as Crown and franchise staff, and this continued once I was part of the combined training and audit field team. Using the Horizon system myself, or supporting PMRs to use the Horizon system, wasn't part of the job remit once I joined the Network Transformation Team in 2012.
3. When in the Sunderland crown office I used the Horizon system on a day-to-day basis, serving customers, and also the weekly "stock balance", to confirm the correct cash and stock levels. As part of the supervisory role I also carried out, I used the system when carrying out a weekly "office balance". I also did this while working at Chester le Street post office. Once I moved to the Network Field Support team, I was involved in delivering classroom training on the Horizon system, on actual Horizon kit, training various people (such as new SPMs and new Crown office staff), but carrying out "dummy" transactions to simulate real transactions, such as bill payments, issuing TV licences, postal orders, etc. I would also carry out initial training onsite with newly appointed sub-postmasters (after the branch had been "transferred" to them from the outgoing postmaster), once they had taken over at a sub post office. There were also other visits to support postmasters, such as a 3 month post-

transfer visit (PTV) in order to offer further support them and assess their progress. They were also some “ad-hoc” support visits, for example if a postmaster had made a request to the support field team for any sort of extra support visit they felt they needed. Once our team merged with the network audit team, I also started to visit branches in order to carry out audits to verify the cash and stock holdings within the branch, as well as compliance audits.

4. I have been asked some questions about my experience as a trainer. Whilst a trainer I carried out both classroom-based training and onsite training in PO branches.
 - a. I was appointed as a trainer after, I believe, a phone interview with one of the network training team area managers. I became aware of the field trainer position after the job was advertised in the network. A colleague of mine had seen the role advertised and suggested it would be something I would be interested in, so I made contact with the team, was interviewed, and then appointed.
 - b. I honestly can't remember the job role criteria, but at the time I applied I had about 10 years post office counter clerk and supervisory experience.
 - c. I had used the Horizon system since it was rolled out to the Crown branch network, possibly about 1999?
 - d. As I was fully aware of how to use the Horizon system myself, my training to be a trainer initially involved “shadowing” existing trainers, in both the

classroom and on-site (in a post office branch), in order to learn the role. I was also given a hard copy of the training manual, which detailed all parts of the offer from the field team, and I also used this as part of my training for the role. I then progressed to delivering the training myself, whilst being supported by an existing trainer, before being judged capable to deliver training on my own.

- e. I carried out training from early 2005 until leaving the training/audit team in about March 2012 to join the Network Transformation Program team. Towards the end of this period I didn't carry out as much actual training, as I was a Field Team Leader, but I still did this when required.
- f. Regarding the number of training courses that I carried out, it is difficult to say exactly, but possibly four or five classroom based courses a year at the most? There would have been more onsite in-branch support required, I can't estimate how many of those I would have been involved with each year. As mentioned above, I did less actual training once I became a Team Leader.
- g. I believe we did receive training when new post office products were launched, and we were also expected to keep up to date with post office transactional changes via the weekly network updates publication that was sent round out to all PO branches across the entire network. Sometimes we would go as a team for any new training if required, such as when the network started to sell financial products such as insurance products, and

this was delivered to us so that we could then deliver onto the people we would then be training. If a new PO product was launched that was going to be incorporated into the classroom training, it would be added to the training manual. We would also have access to the product knowledge and processes, such as printed publications. An example would be when the PO launched it's Homephone and broadband product. I believe we would be expected to "upskill" ourselves and confirm when completed, but something like this could also be covered at our monthly team meetings.

- h. I can't recall any specific feedback I was given regarding the Horizon IT system or the training program.
- i. In terms of the general gist of feedback on Horizon and the training program from SPMs, trainees, etc, I would say it varied, some people learn quicker than others and respond to training differently, so some people will have expressed positivity about the training, some did say they felt they could have had more training. I would say feedback was generally always positive from what I can remember.
- j. We had feedback sheets that we gave out at the end of classroom training, onsite training and ad-hoc visits, and encouraged the trainees to complete (not everyone completed, although we were always asked as trainers to encourage trainees to complete, which I always did). These were then sent into the training team main office to be recorded and summarised, and used to evaluate both individual trainer performance and training program performance.

- k. I honestly can't remember any specific changes that were made to the training program based on trainee feedback, given that it was several years ago that I was involved, but I feel that will have definitely happened, as I believe at team meetings the results of feedback in the network was regularly looked at, and I believe that the higher level managers in the training team were focused on delivering good quality training.
5. I have been asked whether I supervised or trained trainers. I did supervise and train trainers.
- a. This will have been from the time I became a team leader (I'm not sure how long after joining the training team in 2005 I became a team leader, but it was prior to the merge with the audit team in June 2008, so I think about 2007), until I left the training/audit team in 2012. I was based in North East England, and during the time I was a Field Team Leader, the area I covered and managed team members in ranged from the East coast of Scotland (one of my team was based in Aberdeen), central and Eastern Scotland, down to Yorkshire and over to North West England.
 - b. I would find it difficult to say how many trainers that I supervised as their team leader during this time. The teams sometimes changed whilst I was in the field team as part of a review of the national team (eg, at one point the number of field team leaders was reduced, and field trainers moved to new teams). I think possibly there may have been about an average of

eight trainers in a team generally. It was geographically based, I would say that the maximum area of any of the teams I was in as a trainer or team leader ranged from Aberdeen and parts of central and eastern Scotland down to Yorkshire, and across to the North West of England.

- c. As the field teams were often reviewed and changed, including when the training team merged with the audit team, there were quite a few trainers in the different teams that I managed. With the exception of the auditors who joined on the merger of the two different field teams, who needed to be trained to be trainers, I think all the existing field trainers were experienced and capable and didn't need training or any real supervision to do their jobs well. The names that I can remember from all the teams that I managed are: Brian Marshall, John Wilson, Barry Crowther, Kath Smith, Mark Buller, Mike Webb, Mark Sealey, Alex Mackenzie. There are some others where I can only remember their first names.
- d. I don't think I had to actually train any trainers, as I believe all the trainers I managed as a field team leader were already trained prior to me even joining the field team in 2005. When we merged with the audit team in 2008 and the auditors needed to be upskilled, to be able to deliver the training program, they will have been shadowed/trained by experienced trainers in their local area, both for onsite and classroom training (the same as when I started as a trainer). I was a field team leader for a wide geographical area and none of the new team members who came from the audit team were based near to me. I would sit in on a day of a trainer

delivering classroom training sometimes, and sometimes on them delivering onsite training, to check that they were delivering training as per the training manual guidelines. I'm not sure how often this happened, but it wasn't, for example, each course that was delivered, or each time a trainer delivered onsite branch training that a team leader would sit in on them. As a team leader I was responsible for arranging regular team meetings, which would cover a variety of subjects, such as anything related to the current field team delivery program. In terms of actually training trainers, I can't remember doing that other than one time when I delivered a classroom training course in Scotland (Dunfermline), and one of the participants on the course was a POL employer who had previously worked in an area office, in a non-customer facing or transactional capacity. He had just joined one of the Scottish teams in the field training team, and needed to learn the post office transactions himself in order to deliver training. I know that after the training course he was then going to work in a Crown branch office for several weeks in order to familiarize himself with all aspects of post office procedures and transactions before then being supported by his colleagues to start delivering training himself. I believe he has previously worked as a PO counter clerk, but that had been several years previously. I'm unaware of how he progressed after he took part in the training course, as he was in a different region to me and I'd only delivered the training in that area due to the more local trainers being allocated to other training work on that occasion.

- e. I can't recall any specific feedback on the training program that I received from trainers. However, as part of this statement, one of the documents I had access to (Internal Stakeholder Feedback Appendix A[POL00033610]), gives an example of where the field team have been asked to give feedback on the training offer in 2011, in order to review and improve the offer, so this was always something that was important.

- f. I can't recall the gist of any feedback that trainers may have passed to me at any point, but as I state in 5.e., feedback was used to improve the training offer.

- g. As per my answer in 5.e., trainer feedback would be used in reviews, and also any business as usual, ad-hoc updates to the training offer.

Regarding feedback from trainees on classroom courses and onsite PO training, feedback sheets were given to postmasters, new branch staff, etc, which were then sent into the central network training team. These were then cascaded out to the team leaders and trainers in the form of average "scores" for each of the particular questions of the feedback sheets (multiple choice answer questions I think, along the lines of "I agree strongly" to "I disagree strongly" format), and also any comments made on the sheets, where people were able to write a summary of their thoughts on the training they'd received. This was the sort of feedback that would be covered in team meetings, and used to evaluate and improve the training offer.

6. I have been asked a series of questions on the content of the training programme.
 - a. There was already a training program in place when I joined the team in 2005, I'm not sure who was responsible initially. I would say senior management within the field team initiated full training offer reviews, which would involve support from the field team leaders. Various people also contributed to ah-hoc changes and updates, on an ongoing basis, such as the field team leaders.
 - b. I can't think of how the training delivered diverged from the training program.
 - c. The training program was already running when I joined the team in January 2005 and was still running when I left the team in 2012, and was still running when I left POL in 2016.
 - d. In general, I remember that the training program was offered to new SPMs, Crown office branch staff, PO franchise and multiple run branches staff.
 - e. I believe a new trainee would usually take part in the training program on starting their employment with POL, or on becoming a new SPM or

starting employment with a franchised PO branch (eg, WHSmith post office staff).

- f. I delivered classroom and in branch training.

- g. I couldn't estimate an average number of trainees on classroom course, but I think that the main training rooms I delivered courses in, Durham and South Shields, had capacity for eight people. I remember visiting a Crown branch office in Glasgow for team meetings on occasion, and I think there were two training rooms there, each with capacity for about eight trainees. However, during the rollout of the support program when lots of Crown branch post offices closed and WHSmith took on the branches, there was an increased capacity for trainees in order to meet the training needs of staff starting employment with WHSmith all at the same time. These were often delivered in other locations such as hotels, and portable Horizon training kit was used there. I delivered courses for Newcastle and Blackpool where there may have been about 15-20 on each course, and in that case more than one trainer would be involved in delivering the course.

- h. It's difficult to estimate how much time was spent with trainees actually using the Horizon system during classroom training, although I would say the majority of the sessions used Horizon at some point. Individual sessions would initially focus on discussing the product (eg Special Delivery postage), but then move on to how to process the actual transaction through Horizon ("dummy" letters and parcels would be used).

Usually at the end of each day there would be a recap I think, with the chance to practice the transactions on Horizon again, and usually again at the end of the week. Some sessions might not involve Horizon at all, mainly sales coaching sessions for the range of POL insurance and financial products, although I don't think we delivered those sessions when I started in team, as they were just launching the products.

- i. (a) I think that for training on the classroom training courses there was a session on a full cash and stock account balance at the end of each week of a two week training course, but a cash and stock count and check at the end of each day, the same as in an actual live branch situation. (b) I believe as in the case of the daily cash and stock checks the trainees would often have some sort of discrepancy as they were new to the process, so as trainers we would typically show them how to check again, and what may have happened, such as recounting postage stamps, and checking that all customer bill payments had been processed correctly. (c) I'm struggling to remember about how the trainees could seek advice and assistance on the operation of the Horizon system, I would think they were made aware of the POL helpline. I believe for SPMs they will have been made aware that they could request ad-hoc training visits from the training team. (d) I believe the Horizon system contained various information on transactional procedures, various things to do with postage procedures (how to check customs requirements for sending items abroad, etc), and I think in many of the sessions trainees would be shown how to access that information.

- j. Trainees were encouraged throughout the training program, both classroom and in-branch onsite training, to ask questions if they were unsure of any aspect of what was being delivered to them. I was always happy as a trainer to go over something again if a trainee wasn't sure about anything for any particular product or Horizon transaction.

- k. The training program would typically be updated to cover a new POL product, or to remove training for discontinued products.

- l. In classroom situations there was usually a set of transactions completed at the end of each week, as if trainees were serving a customer, which involved covering the same products and services that has been covered in the individual sessions. Also I think some product knowledge questions as well, and the trainee would be made aware of how many that they had completed correctly, and any wrong answers or errors fed back to them. I think at the end of each day trainers would let the trainees do some more practice transactions to reinforce what they'd learnt each day.

- m. I believe given the nature of the very wide range of products and services that were involved in running a post office branch or working in a Crown or franchise branch, the training program focused on the most important parts and products across the classroom and onsite training. So in general I think it was adequate, although in the case of SPMs, particularly those who were in smaller branches and didn't always have the support of as

many experienced existing such as those in a Crown branch, the learning curve is more steep. Although in smaller PO branches they wouldn't usually have the same range of products as those offered in a Crown branch, and so the training offer covered a greater percentage of what they would need to know when they operated their branch.

- n. (a) In order to enable trainees to balance, given that the training team were allocated a certain amount of time to show how to complete balance, both in classroom and in-branch, I think this was adequate to learning the process needed to do this, although all trainees would improve with time and practice. I think the time allocate for this was generally long enough, although SPMs could request further support on an ad-hoc basis if they felt they needed it. (b) I think it would be very difficult or even impossible to cover every single eventuality on shortfalls or discrepancies that may occur in a post office branch, and I would say a lot of knowing what to check and where to look comes with experience, so every eventuality wouldn't have been able to be covered in the time allotted.

7. SPMs were able to request further ad-hoc training from the main training team office, and then trainers would be allocated to visit the branch again to support them. I believe sometimes phone call support could be allocated, depending on the nature of the issue. I'm not sure if Crown staff would be able to get this extra support as they would already have in-branch support from experienced colleagues.

8. I have been asked to consider the Training Review Cascade dated 12 January 2012 [POL00033647]
- a. This was a training review for the training package, I'm assuming as part of a regular check to make sure the team were offering the best training possible, but it looks like the review of the changes to the training offer that had been made the year before. (b) It seems to be that different managers and team leaders were allocated to look at different parts of the training offer, and then submit feedback on possible changes and improvements. (c) I don't know which individual would have decided to commence the review. Or if it was recommended by the senior managers in the network field team.
- b. I have been asked to expand on the following wording in the document "Onsite too short at times-Once the transfer audit is done, the balance is shown on a Wednesday and a half day Saturday there is not always time to cover topics". The comment about "On site too short at times....." I'm not sure if this was obtained from feedback from trainees or from my team, that I've then submitted to the review.
- (i) I can't remember specifically what sorts of topics would likely have been "missed" during the onsite training period, but given the extremely wide range of PO products and services offered in branches, it would be very difficult to cover everything. During the time that a trainer was onsite with the new SPM, the SPM would

carry out transactions based on what customers required, but trainers could show them various transactions even if no customers had requested them. For example, at quiet periods between customers, the trainer could demonstrate how to carry out a particular transaction, discussing with the SPM, etc. This could be done by demonstrating on the Horizon system how the transaction would be done, without actually processing the transaction. Also making reference to the online transactional information held on the Horizon system (eg, showing the SPM how to look up information on what products are prohibited from being sent to certain countries).

- (ii) SPMs could request ad-hoc visits from the training team schedulers, but also, if at the end of the onsite training period the trainer could also request to come back to cover anything they felt was missed. I think in most cases the training offer for the onsite part was fully covered, but if for any reason it wasn't (eg. SPM was ill and missed a day?), it could be requested.
- c. I have been asked to expand on the following wording in the document: "Standard training package. The training package would have to increase. Forms part of the review". In terms of my memory of this wording in the document, I'm not able to answer any more than this, other than the feedback given by me as shown on the Powerpoint slide 58 that was included in the review, and that the onsite training package was ultimately

viewed as the correct length of time as it was, by the review. So I don't think the length of time for onsite training was then increased, but there was still then the option for SPMs to request some additional support after the initial training had ended.

- d. Although I can't remember the specifics of the time, reading through the presentation, I believe I will have been responsible for submitting and presenting slides 85-87.
 - (i) I can't remember who specifically will have asked for me to review that part of the training offer. It's likely that this process was discussed at a previous team leader/manager meeting, and different sections allocated to the various team leaders.
 - (ii) This will have been part of the overall review of the most recent training offer.
 - (iii) I couldn't say whether the response to the requests were effective in addressing the relevant reason for the request, given how long ago it is since it occurred, and that I left the training team for a role in a different program two or three months after this presentation is dated.

- e. I now can't remember changes made as a result of the work done creating the slides, but going by the information on slide 86, the request to update

the pre-training checklist for an incoming SPM was granted and completed.

9. I have been asked to consider Internal Stakeholders Feedback Appendix A dated December 2011 [POL00033610], Training Q3 Review, Appendix B dated December 2011 [POL00033611] and Review of Post Office Ltd New Entrant Training Pilot dated December 2011 [POL00033612].
 - a. I can't specifically remember the context of the review, but based on the documents it was completed in 2011 as a review of the training offer for new entrants, I honestly couldn't say more than that.
 - b. I would say that each item of feedback was after consultation with my own team that I was team leader for, and the main points we felt would help improve the training offer were fed into the review.
 - c. I'm not able to remember what changes were made as a result of the review.
 - d. If an ad-hoc request was made for a SPM to receive extra support regarding accounting procedures, and this were allocated, it could be scheduled for, say, two hours, a half day, a full day, or even possibly a phone call invention, depending on the nature of the issue and the request. I think the amount of time allocated and method of support would have been decided at the field team main admin office in Salford, I'm not

sure what the process was to decide that or which individual would have done that. I think that some examples of extra support being given, by way of a trainer being scheduled to attend a branch for an “ad-hoc” visit, would be: A branch was allocated a new product, for example, the passport check & send product, so a trainer could be allocated a full day to attend the branch to cover this; or a SPM might ask for more support with the weekly balance procedure, a trainer could be scheduled to attend on the balance day. I couldn’t say how often ad-hoc visits were scheduled, although I do seem to remember trainers and team leaders could view the current training schedule, which showed nationally which trainers were scheduled to deliver onsite and classroom training over the coming weeks, and I think there was regularly ad-hoc training on the schedule. Possibly there’s still a record of these schedules somewhere.

e. I have been asked if additional support or training was provided to those who needed it, (i) did I consider this to be adequate and (ii) how would trainers have satisfied themselves that the trainees no longer required the additional training or support

(i) I would like to think this was adequate, and that in most cases the requested additional support then left the SPM able to perform the particular transaction correctly, etc, (depending on the nature of the visit request). However, any further requests could still be made by the SPM, or even the trainer themselves, if they felt that a return visit would further help support the SPM. I believe I may have done

that myself on occasion, although I can't remember the specific example of the actual training need. Any requests for ad-hoc training would be considered by the scheduling team based at Salford.

- (ii) Trainers would likely have been aware of the ability of those they supported by observation of and discussion with the trainee regarding the various training tasks. I believe there was a tick-list of the transactions and processes to be covered during training which the trainer completed as the training progressed, and whether or not they were judged as capable to complete.

10. Post transfer contact was scheduled, at the one month and three month stages, in order to add further support and confirmation of how the SPM was doing. I believe the one month contact may have been a phone call while the three month was a Post Transfer Visit (PTV). There was a list of items to cover, essentially a check list to go through to ask the SPM, although the SPM was able to ask any questions as well as part of a general discussion of how they were doing.

11. I will have provided SPMs with help as part of the initial training package, at any ad-hoc training, and at PTVs.,

12. I have been asked how issues raised by subpostmasters would be escalated. It's difficult to say about how any difficulties were escalated, as I would have

hoped to solve any problems at the time, but I think on occasion I may have requested another visit from a member of the training team if I felt there were other issues that the SPM could do with support with. I would think also that I would make the SPM aware of the POL helpline for future issues also, if appropriate, as that was a source of support for the PO network. I also think that I sometimes made use of the POL Helpline while onsite with a SPM, in order to help answer a question or solve an issue at the time. For example, there was once an issue when a SPM had incorrectly processed a customer bill by not recording the customer account number on the Horizon system for the company that the customer was paying the bill to, so I called the helpline in order to try and confirm what details had been processed. I recall then telling the customer how the error could be rectified.

13. I can't honestly remember any instances where there were difficulties with the Horizon system, in terms of anyone suggesting there was something wrong with the way it was operating. The only difficulties I remember with the Horizon system were due to human error, as in the example I give in 12, above.

14. I have been asked whether I think that there were steps that ought to have been taken in relation to concerns I raised. My answer is no.

15. I have been asked whether there was anyone I felt could have done more to assist subpostmasters. My answer is no, I can't think of anyone.

16. I have been asked whether I was aware of any bugs, errors, or defects in Horizon at the time. I wasn't aware of any bugs or defects in Horizon.

17. I have been asked to consider Post Office Ltd-Network Support – Field Support Change and Best Practice Registration and Management System [POL00084807]

a. I've no great memory of this register, so I don't think I was involved in its upkeep, but have used it, as shown. It looks like it was created for members of the field team to raise improvement suggestions for all aspects of the processes for delivering the training program and audit process. It will have been an important tool for continual upkeep of the training offer as and when needed, rather than wait for something like a yearly review to look at necessary changes. I don't know when it was created, or whether it was in use when I joined the team in 2005 (I'm guessing it was though) or if it was still in use when I left in 2012.

b. I have been asked to expand on the following: " it's only really the first part of the document we need, as we should all know the rest anyway. I got this from a Field Change Manager at a re-opening the other day. I know generally the migrating of newly installed kit will be done by someone like him, but Ged in my team was at one last year and, for one reason or the

other, it hadn't been done. As she worked on the Horizon migration team several years back, she was able to save the day as she knew what to do. These instructions should be useful in an emergency"

- (i) I can't remember any other occasions where I came across this.
- (ii) I would say the "emergency" that I've referred to in this context would be Horizon migration not having been done at the correct time, leading to delays in the branch opening and operating.

18. I wasn't involved in the Horizon Online rollout, as I was working in a Crown branch when it was rolled out there, and also still working in the Crown branch when Horizon was rolled out to the rest of the Network a few years later.

19. When the Horizon system was updated to become Horizon Online (HOL) in 2010, I, along with other field team members, were allocated to different PO branches to help with the overnight installation of the IT update. I believe there was a checklist of various things to cover on that needed to be done, such as printing an office balance (or office snapshot?) from the system before HOL installation, and then printing the same again after installation. I

think we visited the branch at the end of the day before overnight HOL installation, and returned the next morning to check that it had worked correctly. We were able to confirm that it had worked correctly, I think, by information shown on the Horizon system to verify correct installation, as well as comparing the office balance/snapshot printouts from before and after. The only time I remember any difficulties at any of the branches that I supported for the roll out, was at a branch where, during the night when migration was taking place, there had been a brief power cut at the branch, and as a consequence the Horizon system hadn't updated to the new online system over night. I believe that in this case the branch just opened as usual the next morning when I attended, and continued to use the existing Horizon system/software. A new date was then allocated for the overnight online migration, and another field team member was scheduled to attend, so I assume that it migrated successfully then, although I wasn't involved in this second visit.

20. I have been asked a series of questions about my involvement in the resolution of disputes. I was the auditor at a sub-post office branch in Newcastle once (I can't remember the name of the branch), where the SPM disputed that the missing cash amount was down to them having taken the money themselves. They said that the external PO ATM in the branch had been giving faulty readings, leading to a shortfall of cash when the ATM readings had been entered into the Horizon system as part of the daily cash declaration and weekly cash balance. The SPM was subsequently dismissed

and the case went to court, where I was called to be a witness, although the trial itself didn't take place, as the SPM accepted responsibility for a proportion of the missing cash, but not all of it. I'm fairly certain that during the audit process in branch when the cash shortage was discovered, the SPM only disputed the fact that in their opinion, the "faulty" ATM readings had caused the cash shortfall, and didn't suggest that the cause was the Horizon accounting system.

21. I'm not really aware of how disputes were resolved in the case of SPMs having been suspended due to shortfalls in cash. From what I remember, after an audit was completed and a SPM suspended, an area network manager (I think Business Development Manager – BDM was one job role title while I was there) would be involved (they were the person who would actually suspend the SPM on the day of the audit if required). So I would think that they would be the person who would handle the dispute. If this question refers to a dispute of the findings during the actual audit itself, then there would have been another check of the cash and stock to satisfy the SPM that the findings were correct.

22. I don't know of any involvement of Fujitsu in disputes.

23. I've no idea if the process to resolve disputes could be improved.

24. I have been asked to describe the process for branch account audits whilst I was at the Post Office.

- a. I first became involved with auditing in PO branches when the training team merged with the existing audit team in 2008, so prior to this, people who audited PO branches were classed as “auditors”. Upon merging, audits were then carried out by the new multi-skilled field team, who also had responsibility for delivering the training program (I can’t remember the specific job role title of the trainer/auditor at the time). I don’t know if, prior to the two different teams merging, people recruited into the audit team had to have minimum qualifications or experience, but myself and the other members of what was the field training team automatically took on the role of auditing when the teams merged.

- b. The former trainers were scheduled to accompany former members of the audit team to some audits in order to “shadow” them, and learn how to perform audits, but we also took an active part in the audits as well, such as helping count cash and stock at each audit. We watched the auditor complete the electronic audit document (an Excel spreadsheet called, I think, a P32) during the audit, which, when cash and stock details were entered, would show if any cash or stock was registering as missing or in surplus in the branch. There was also a “compliance” part of the audit carried out, but this didn’t relate to cash and stock, and was to do with other PO procedures, such as checking the SPM carried out security procedures correctly, and displayed the correct PO promotional literature, etc. In terms of any “classroom” based audit training for former trainers, I think we did have some, where we went through the audit process, and shown the P32 form, also examples of audit reports, etc. I can’t remember

exactly how many audits I initially shadowed at, I can remember two specifically, but there may have been more. After shadowing initially, I then progressed to “leading” an audit myself, where I was responsible for completing the audit summary document at the audit, and the subsequent audit reports. I was myself “shadowed” by one of the experienced auditors, who supervised me leading the audit. I can’t remember how many audits I was shadowed on, but I think that in the early days of my auditing experience, if it was a minimum two person audit, there was often an experienced auditor involved.

- c. There was a person/people responsible for scheduling branch audits, and I believe they used something referred to as a “risk model”, I assume an electronic document that would say what branches should be audited and when, based on things like reported daily and weekly cash and stock holdings by the staff in a branch. Although I was never involved in this part of the audit procedure, I believe the “model” would also bring up some branches to be audited randomly, although I think the majority were scheduled to be audited due to specific factors, such as the cash and stock holdings. I think that there were known average recommended amounts of cash and stock holdings in each branch, and if any declared cash and stock on the Horizon system in a branch deviated and showed “unusual” amounts, then an audit may be scheduled. I think audits could also be scheduled at the request of POL staff (such as the BDM responsible for the branch), if they had any reason to believe that there were concerns about cash and stock at a branch, although I don’t think I

could add more to that. One example of an audit having to take place on an ad-hoc basis would be when I once carried out a 3 month Post Transfer Visit to support a recently appointment SPM. As well as working through the list of questions with the SPM to ascertain their knowledge of PO procedures since they'd taken over the branch, a "cash check" was to be performed. This was essentially to print off a report from the Horizon system to say how much cash should be held in the branch based on recent customer transactions, and then me doing a count to see how closely it matched (the same as when the SPM was expected to do a daily end of day cash declaration). I discovered a cash shortage of several thousand pounds, so on rechecking and finding the same result, closed the branch, and requested an actual audit the next morning. At the time I think we'd just merged with the former audit team and I'd not had any audit training, or I would have been able to do the audit myself at the time, but an experienced auditor was then scheduled to do that the next day. There was no suggestion that in this case the missing cash figure was due to the Horizon accounting system, and the SPM later admitted to having taken the money himself, and I think was found guilty at a trial.

- d. There was an audit process guide which was followed. In terms of once we were onsite, all cash and stock in the branch was checked, and the figures entered onto an Excel spreadsheet (P32), to give the audit results, showing any shortages or excesses. Once the cash and stock audit was completed there was usually a compliance audit, as I mention in (b), above. In the event that there was a cash/stock shortage or gain, I think of

over £1000, the auditor would need to contact the area manager (BDM) for the branch to report the findings, as potentially the SPM could be suspended. Once an audit was completed, away from the branch, we would prepare various audit reports, some to be stored with POL as evidence of the completed audit, and an audit report was also sent out to the SPM (for both cash/stock and compliance parts of the audit), summarizing our findings on the day. I think sometimes audits may have been scheduled that were only compliance audits, not cash and stock, although I can't remember how often these occurred or for what reason, possibly they were a follow up to a previous audit where the branch hadn't done very well on the compliance part of the audit.

- e. Auditors could access the same information held on the Horizon system as the SPM, such as cash and stock holdings; transaction logs (i.e. a list of each daily transaction performed in the branch, including details of which registered member of staff had entered each transaction into Horizon); internal cash and stock transfers (where one member of staff could give or receive cash or stock items to/from another member of staff, assuming they had been assigned their own "stock unit", a way to allocate responsibility to individuals for the specific cash and stock they worked with); and office remittances (REMS), which were details of cash and stock that had been either delivered to the branch or sent out from the branch to the PO cash centres or stock centres. If "keystroke data" is the act of recording every time an individual strikes a key on the Horizon keyboard, I think that's not the sort of information we could access.

- f. I think the only “special privileges” an auditor had on the use of the Horizon system was at the end of an audit, where we could post/record losses and gains. An example would be when a SPM had been suspended due to a cash loss, the loss would need to be recorded on Horizon, so as auditors we could access the branch Horizon system to do this. A SPM or member of their staff wouldn’t be able to access the part of the system that did this. I think when we logged onto Horizon at the start of the audit we used a “username” that both recorded that we were an auditor accessing the system, and gave us access to record losses and gains, as well as being able to print various reports needed for the audit.
- g. Referring back to my answer in (b), above, trainers who were also required to then do audits were supervised/shadowed by their colleagues in the field team who had previously been auditors only. I’m not aware that the former audit team members were given any training to do this (but may have been). I believe all the auditors who joined the field team who I worked with had many years of experience.

26 I couldn’t remember specifically from memory if the overall audit process changed much during the time I was involved doing audits from 2018 to when I left the field team in 2012. However, in order to complete question 27 for this statement I’ve read the Review of Audit Processes and Tools October 2011 document (POL00085682), with the headline changes being listed and full changes referred to being in Appendix C of the review document. Also I can

see that In Jan 2009 a revision of the Audit Process Chapters was completed after the training team and audit teams had merged the year before.

27 I have been asked to consider document Review of Post Office Ltd Audit process and Tools dated October 2011 [POL00085682]

- a. I can only really base my answer on the information in the review document, that the review was completed during the first two quarters of 2011-12 financial year, in order to make sure that the Audit Process Chapters were fit for purpose to deliver business requirements.
- b. I would say that any review of any business processes that involve input from business stakeholders, and in the case of this review, where the actual field team who were responsible for delivering the audit program were encouraged to give feedback and opinions on the audit process, is valuable. I can't remember specifically how I felt about it at the time, although I would think that I would have thought the same then.
- c. I can't remember thinking there were any weakness in the review, or looking at the review now, notice anything I would consider to be a weakness.

28 . I have been asked questions about various iterations of Chapter 3 of the Audit Process Manual.

- a. As an author of the particular chapter of the audit manual I was expected to contribute, along with my field team leader colleagues who were also assigned to that chapter (as well as colleagues responsible for the other chapters), in order to update the chapter on a regular, ad-hoc basis, if a process had changed, or an improvement to part of the process had been spotted. Also, if any new or annual review were to take place, such as the review that question 27, above, relates to, I would be involved in that.
When I was first delegated to maintain that particular audit chapter, it will have already existed, with other colleagues already identified as authors. I can't say which parts within each chapter that I may have changed and recorded, or which parts my fellow authors updated. I can't remember if we were allocated parts of the chapter each to review, or if we all met together and then reviewed the whole chapter together. I think will have used the existing version of the chapter, pre-review, and used feedback in order to change and improve it.

- b. In terms of how the ad-hoc, business as usual changes to the chapter went, I would think this could have come from input from any field team member raising the issue of a change to a PO accounting procedure, or something that would warrant the chapter being updated, probably based on their day-to-day use of the audit chapters whilst carrying out onsite audits. Also, updates could be requested from any internal stakeholder who requested an addition or change to the current process. Regarding the review in 2011, the Review of Audit Processes and Tools October

2011 document (POL00058682) states that the review was done using full stakeholder engagement, as well as field team inspection and feedback on the current processes at the time.

- c. I remember that field team leaders were required, as part of our role, to carry out regular quality assurance (QA) checks on a sample of field team audits, in order to make sure that processes were being followed correctly. This involved examining the audit paperwork and electronic audit summary forms (P32 and CAT tool), then feeding back to individual field team members on the quality of their audit documents, as well as regular field team leader meetings, to compare and discuss QA standards across the whole team. I think field team leaders were also asked to take part in audits with the team members in order to check they were carrying out audits correctly, although I can't remember if there was any sort of associated "checklist" that a team leader would use for that. As part of day-to-day audits, team leaders would also often be scheduled to take part in audits along with their team members, although not specifically to monitor or supervise them, we were just part of the audit "team" visiting a branch for the audit

- d. I believe the main steps taken were the feedback given to the field team individuals who had been QA assessed. This would have likely involved making references to any errors spotted in paperwork, etc, with reference to the correct procedures as defined in the overall audit process manual. I

believe that will have been effective in maintaining a good standard of auditing.

29. As far as I remember, in general, I believe both the audit process, and manual that the field teams used, were fit for purpose. Regular updates were done if needed, as well as full reviews, such as those done in 2009 and 2011 to make sure it was fit for purpose. In my case I would say my opinion is based on my experience using the manual and my time carrying out audits.

30. I don't have any other matters to raise.

Statement of Truth

I believe the content of this statement to be true

Signed:  _____

Dated: 15/2/23

Index to [FirstWitness Statement of David Gordon Ogleby

No	URN	Document Description	Control Number
1	POL00033610	Internal Stakeholder Feedback Appendix dated December 2011	POL-0030545
2	POL00033647	Training Review Cascade dated 12 January 2012	POL-0030582
3	POL00033611	Training Q3 Review dated December 2011	POL-0030546
4	POL00033612	Review of the Post Office Ltd New Entrant Training Pilot dated December 2011	POL-0030447
5	POL00084807	Post Office Ltd – Network Support – Field Support Change and Best Practice Registration and Management Systems	POL-0081865
6	POL00085682	Review of Post Office Ltd Audit Processes and Tools dated October 2011	POL-0082740