

Witness Name: Mr Paul Rich

Statement No. WITN0403_01

Exhibits: WITN0403_01/1 –
WITN0403_01/59

Dated: 21st September, 2022

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF MR PAUL RICH

I, MR PAUL RICH, will say as follows...

Introduction

1. I, Mr Paul Rich, previously employed by Post Office Counters Limited ("POCL"), provide this statement in response to the request under Rule 9 of the Inquiry Rules 2006 dated 7 June 2022. This statement relates to Phase 2 of the Inquiry: Horizon IT system: procurement, design, roll out and modifications.
2. I make this statement to the best of my recollection. Some of the documents provided to me by the Inquiry I had not previously seen and, where that is the case, I have highlighted this in my statement. I have answered all the questions asked by the Inquiry in good faith and as openly and honestly as I am able.

Career background

3. I began my career working in a mixture of Marketing, Commercial and General Management roles in the private sector.
4. In March 1987, I joined the POCL Marketing Department.
5. In August 1993, I was promoted to a business head of the Marketing Department with the courtesy title of Financial Markets Director. This role included, amongst other things, responsibility for the Benefits Agency as a POCL client.
6. In September 1995, I was appointed Partnership Development Director (again a courtesy title). In this role, I reported to the POCL Executive Resources Director. I attended the POCL Executive, although I was not a member. The focus of my role was to take forward the Horizon project post-evaluation.
7. In April 1996, I was appointed as a member of the POCL Executive. I worked as a Development Director reporting to the POCL Managing Director. An internal newsbrief of my appointment dated 2 April 1996 is exhibited to my statement (WITN0403_01/1, WITN04030101). The focus of my role was the Horizon project, including the day-to-day sponsorship of the Programme Delivery Authority ("**PDA**") on behalf of POCL. It is worth highlighting that the PDA formally reported via the PDA Board (of which I was a member) to the

new Programme Steering Committee ("**PSC**"). Both the PDA Board and the PSC were multi-organisational bodies.

8. In March 1997, I became a POCL Company Director.
9. In March 1999, I left POCL and took up a new role as Managing Director of Customer Management for the entire Royal Mail ("**RM**") Group. Given my knowledge of Horizon, I carried on providing strategic advice on the project's strategy and roll out until late May 1999. In June 1999, I formally resigned from my POCL Company Director role. After this point, I had very little personal involvement in the Horizon project (but see paragraph 12 below).
10. In 1999, as part of a PO reorganisation, POCL was split into three business units each with its own new Managing Director: Network (including the Horizon roll out); Banking Services; and Cash Handling & Distribution. The three MDs reported to a Group MD sitting on the Group Executive Board. This Group Executive Board then reported to the Group CEO.
11. In November 2001, Post Office Limited ("**POL**") recombined these three business units into one company as a subsidiary of the RM Group.
12. In August 2001, I was appointed Acting Group Managing Director of POL whilst external recruitment for a new POL CEO was carried out. My temporary role reported to the PO Group CEO and I attended the main PO Board but not as

a member of it. When POL was incorporated in November 2001, I became a company director of it until the new recruit was in post.

13. By April 2002, a permanent POL CEO was in place. I ceased my acting group MD role and resigned my POL company directorship at the same time. I was then appointed Group Corporate Development Director working on short-term projects for the PO Chairman and Chief Executive.

14. In November 2002, I was promoted to Deputy Managing Director and Marketing Director of RM and became a member of the RM Group executive board and a company director of RM Group.

15. In September 2004, due to restructuring of roles and directorships, I ceased to be a RM Group director.

16. In early 2005, I left the RM Group. I subsequently became an NED/Chair in both the public and private sector. I am now retired from paid work and I volunteer as an NED Governor of a not-for-profit hospital.

Background to my involvement in Horizon

17. A helpful chronology of the Horizon project appears at Appendix 3 of the National Audit Office Report by the Comptroller and Auditor General "The Cancellation of the Benefits Payment Card Project" ("**the NAO report**")

published on 18 August 2000 (WITN0403_01/2, POL00000805). I have read this report to refresh my memory of the details of the project.

18. As mentioned in paragraph 5, from August 1993 I headed up the Marketing Business Unit for all financial service clients, including the Benefits Agency ("**BA**"). In this role, I became responsible for the perennial annual contracts with BA.

19. At the time the BA were the Post Office's largest client, and the revenue from handling benefits payments accounted for over a third of POCL's income (see page 23 of the NAO report (WITN0403_01/2, POL00000805)). Individuals coming into post offices to collect their benefits monies then also used other POCL services and co-located private retail outlets. Moreover, BA work underpinned the underlying cash distribution balance that post offices fulfilled nationally. This balance was made up largely of cash benefits being paid out, with corporate deposit business paid in, via the recently privatised Girobank's corporate deposit service for businesses at post offices. Losing BA as a client would have led to many post office closures, estimated to be in excess of 4,500 closures, and a likely spiral of decline for POCL. It would also have led to a sudden huge imbalance of cash distribution nationally.

20. BA were determined to move towards Automated Credit Transfer ("**ACT**") and replace the existing paper-based methods of paying social security benefits

with a far more automated system. BA believed this would save transaction costs and provide better fraud protection.

21. POCL wanted to retain business with BA as long as practically possible. I was involved in numerous other commercial projects to enhance the viability of POCL and make best use of its assets and infrastructure, such as selling national lottery tickets and offering Bureau de Change services. We were also undertaking studies and creating models to consider POCL's other commercial options, but essentially POCL needed a managed transition if benefits were going to move to ACT with a resulting loss of a large part of our business.

22. POCL also could see the benefits of automation for the post office, as explored in the Government's Green Paper on the future of the Post Office dated June 1994 (WITN0403_01/3, RLIT0000002) ("**the Green Paper**"). Automation had the potential to link all the post offices in the future via an electronic national network, and generate new business.

23. I was involved in the internal POCL discussions to debate the potential automation of social security benefits. A meeting note of these discussions on 30 July 1993 can be seen at WITN0403_01/4, POL00028137. At this point, I was the designate Director, Financial Markets.

24. I took on the role of the commercial lead in and was an architect of the Memorandum of Understanding ("MOU") negotiations with BA, which was to

underpin a transition in our relationship and support what became the Horizon programme. POCL needed a medium term commitment with BA with a tapering floor level of business so that the relationship did not come to a sudden end (and did not need to continue to be negotiated annually). POCL were willing to commit to help commission an automated, cheaper and less fraud prone way of paying benefits. To help with our negotiations for the MOU, POCL brought in consultants and commissioned various financial models and we postulated various assumptions, and involved BA in these, to work up a viable model.

25. We ultimately secured an 8-year agreement with BA. A MOU was subsequently signed between POCL and the BA Finance Director with an agreement to procure a new benefit payment card. This was an in principle agreement with much of the detail of the project still to be decided. I have not been provided with a copy of this MOU.

26. We recognised that in due course the relationship between POCL and BA would need to be formalised in contractual documents. It was identified that these contracts would need to be back to back with contracts signed with the ultimate benefits payment card supplier, and would also involve the Social Security Agency in Northern Ireland ("SSA"). Therefore, we needed to await formal appointment of the supplier before finalising more detailed contractual arrangements with the BA and the SSA – though Heads of Terms were progressed as much as possible in this period.

Procurement of Horizon – Early 1994 to May 1996

27. Once the MOU had been signed, POCL's focus moved to the procurement process to procure a new IT system. We commissioned a joint feasibility study after which the procurement process was actioned jointly for a new platform and benefit payment card. Getting to this point involved a lot of buy in across government and with other stakeholders such as sub-postmasters.

28. During the procurement process, I was a member of the Project Evaluation Board. The Project Evaluation Board was chaired by one of POCL's Executive Directors Bob Peaple. The Project Evaluation Board's aim was to create evaluation criteria that the suppliers could be reviewed objectively against and with the right arms-length expertise (see paragraph 35 for the Value Assessment Model). As a member, I gave my input into the evaluation criteria including on customer acceptability and operational use by agents in offices. The Project Evaluation Board then reported their recommendations to a steering committee (see paragraph 31 below).

29. I have been asked by the Inquiry to describe the purpose of the PSC. The PSC was not created until after the contract was awarded to Pathway in May 1996. The purpose of the PSC was to steer the strategic decision making process. As described in the Project Initiation Document for the Programme Delivery Authority (WITN0403_01/5, FUJ00079001) pages 13 and 14, the PSC had the ultimate authority to monitor, review and ensure the successful

completion of the Horizon programme. The PSC worked under PRINCE project principles.

30. The PSC comprised of the Managing Director of POCL, the Chief Executive of BA, the Chief Executive of SSA and the Chief Executive of ICL. The PDA Programme Director and the BA Project Director were attendees. Although I attended the PSC, I was not a member. The MD of POCL sat on the committee as a member and represented our organisation (please see page 14 of the Project Initiation document produced by the PDA dated November 1996 WITN0403_01/5, FUJ00079001). The PDA board reported the project's progress to the PSC. A useful diagram of the organisations involved after the contract was awarded to Pathway can be seen at figure 17 of the NAO report (WITN0403_01/2, POL00000805).

31. During the procurement stages there was however a steering committee. I did not sit on the steering committee and it was mostly comprised of senior officials such as individuals from the Department for Trade and Industry ("DTI"), Department for Social Security ("DSS") and Treasury. As far as I can recall, the steering committee was disbanded once the procurement was concluded and replaced by the PSC.

32. POCL's objectives in procuring the new IT system are explained in paragraphs 19, 21, and 22 above. The Green Paper (WITN0403_01/3, RLIT00000002) explains that automation was seen as the best way to secure

the network". It was vital for the Post Office to maintain their business as a long-term choice for customers, improve their competitiveness in the market, enable better customer choice and service, as well as maintain ties to the BA.

33. The system was procured under the Private Finance Initiative ("**PFI**"). This was a relatively new concept at the time and I recall it was government policy, as a result of Treasury Guidance in the late 1980s, to consider this option for the funding of projects such as this. Using PFI was seen to have a number of benefits. As explained in the paper seeking PO Board authority to proceed to the contract award stage of the counter automation project (WITN0403_01/6, POL00028450), using PFI meant that a strategic alliance could be forged with a private sector supplier. This brought in numerous private sector skills such as those in product development and marketing. The nature of the PFI contract meant that there was no capital investment by POCL and that they would pay for the system as they used it, making the project financially viable. Crucially, it also enabled the risks of the project (such as the risks of benefit fraud and the risks of design, build, installation, and operation of the system) to be passed onto the service provider. Neither POCL nor BA had the resources or appetite to carry these risks themselves, and so this became a critically important criterion for the bids to meet. This was especially true for BA on the transfer of the risk of benefit fraud upon which their own DSS business case was built. It was always clear from the outset that numerous factors meant that the project would not be feasible as

a joint venture, and that BA were opposed to POCL funding and owning the system (see page 3 of the Investment Appraisal Commentary for BA/POCL automation WITN0403_01/7, POL00028452).

34. However, using PFI did not mean that full control of all aspects of the project would pass to the service provider. For example, BA ensured that business rules relating to benefit encashments would not lie with the bidder. It was understood that the businesses procuring the services each had certain pre-requisite. For, POCL we needed to be assured that systems interfaces would operate smoothly; that the system was easy to operate by agents; and would not result in any deterioration in the service for customers.

35. As outlined in paragraph 28 above, during the procurement process I sat on the multi-organisation Project Evaluation Board chaired by POCL's Executive Director. I gave my input into the evaluation criteria. The Value Assessment Model, which was a generic model that we collectively customised and weighted according to the needs of the BA/POCL project, details how we valued a good bidder for the contract and can be seen at WITN0403_01/8, POL00028275.

36. When it came to evaluating the bids, in accordance with good procurement practice, a separate assessment team scored how the bids met our criteria. The assessment team reported their recommendation to the Project Evaluation Board. The Project Evaluation Board then passed its

recommendations on to the various stakeholders. In POCL the recommendation would require approval from the Major Projects Expenditure Committee ("**MaPEC**"), the PO Board Finance Authority, and the PO Board itself. Concurrences towards that had to be given by POCL's MD strategically, and from Group IT for technical concurrence. Members of the POCL Marketing Department were also consulted to check the market benefits claimed in the bids.

37. An embryonic joint PDA team was set up to help run the procurement and evaluation/contracting process headed up by an individual from the DSS. This team was later replaced in May 1996 by the joint PDA as described in paragraph 44 below. The embryonic PDA drew upon best practice at the time for procurement under OJEU rules, and had its own technical, commercial and operational teams. WITN0403_01/9, POL00031279 is a letter from me in February 1996, reaching out to the relatively new Group IT Director, clarifying his role in technical concurrence. External experts were also called on by POCL and the embryonic PDA as required, including external financial advisors (e.g. Charterhouse), lawyers and modelling experts such as Coopers & Lybrand. The embryonic PDA helped assess the bids against our criteria, and provided options to the joint Project Evaluation Board and ultimately the steering committee for decisions.

38. As far as I can recall, the project received many expressions of interest. After the issuing of a Statement of Service Requirements, five potential suppliers

went through to the next stage, and then three bidders were sent an Invitation to Tender ("ITT"). Before issuing the formal ITT, a series of discussions took place with relevant technical and market experts to understand the impacts of the bids and see if any requirements would need to be amended. I believe that these discussions would have been initiated by the embryonic PDA or by PO's Group IT director or his team. Evidence of these discussions between January and early March 1996 can be seen in WITN0403_01/10, POL00031278; WITN0403_01/11, POL00031277; WITN0403_01/12, POL00031275; WITN0403_01/13, POL00031276 and WITN0403_01/9, POL00031279 (although some of these documents are difficult to read). I recall that it was part of the Treasury Guidance for PFI projects to encourage enterprise in the delivery of the project, but as outlined above, there were certain requirements or "hurdles" and application of business requirements from POCL and BA that had to be met.

39. During procurement, some risks were identified in Pathway's bid (which was at that stage just referred to as "Dick"). The risks included:
- a. the proposed technical solution;
 - b. the card technology;
 - c. fraud risk on the card;
 - d. Pathway's financial structure; and
 - e. the dependence that Pathway placed on their sub-contractor Escher who was a small company.

40. The Project Evaluation Board considered these risks in detail, as can be seen in the meeting note from the Evaluation Board Meeting dated 26 February 1996 (WITN0403_01/14, POL00028288). The board considered whether Pathway's suggestion of adopting an integrated circuit ("IC") card would have helped clear the risk, but concluded that this would introduce more risks. Instead, reflecting the risks and issues against them, it was understood that Pathway would be allocated a substantial cost penalty in the Value Factor assessment, and the Evaluation Board would give due weight to this in reaching their decision.
41. During this meeting, at para 2.8 page 3, Tony Johnson explained that after much consideration, the Demonstrator team had concluded that the Pathway's solution was not "fundamentally flawed" and that "from a strictly technical viewpoint the hurdle had been cleared". I cannot recall who the Demonstrator Team were, but they operated within the embryonic PDA (please see page 3 of the Value Assessment Model WITN0403_01/8, POL00028275). In addition, the PO Group IT director had to give technical concurrence that the system would be acceptable as part of the approval of the business case by the PO Board (please see my letter to the Group IT director WITN0403_01/9, POL00031279; and page 6 of the PO Board paper regarding BA/POCL automation WITN0403_01/15, POL00031237).
42. Given the identified concerns about the financial structure, during the procurement process the Evaluation Board enlisted the help of

Charterhouse, financing and business strategy specialists, to evaluate the risks and advise whether some of the outstanding issues could be resolved.

43. By the time that Pathway was chosen as the provider, the risk against Pathway's financial structure and dependence on its sub-contractor had also been cleared. There were still some high level details that had yet to be agreed between the parties. From memory, these were twofold: a) who led the consortium as the prime accountable organisation; and b) would there be parent company guarantees or similar. The Evaluation Board accepted that to proceed with Pathway implied a degree of risk but agreed that such risks were acceptable and manageable (as per the NAO report chronology at WITN0403_01/2, POL00000805). Eventually these were resolved with Charterhouse's specialist advice as documented on page 2 of the revised business case document WITN0403_01/16, POL00029120.

44. In parallel with the eventual decision to appoint Pathway, and in order to mitigate any risks, the joint PDA was to be set up to act as assurance body. Independent reviews were also regularly undertaken as part of the mitigation of risk to keep an eye on the project, including those undertaken by PA Consulting. One such review undertaken by PA Consulting and titled 'Review of BA-POCL Programme' is WITN0403_01/17, POL00028092. Please also see paragraph 55 below. Commercial contracts between POCL and BA were completed after the award of the contract to Pathway, to ensure that the back-to-back agreements were aligned. Over time, as described below,

further testing was put in place and resources were made available in the post office network to support training and installation.

45. The JSC made the final decision to award the contract to Pathway based on the Project Board's recommendations supported by ministers and the PO Board. A decisive factor in the selection of Pathway was that they were the only bidder to be PFI compliant in terms of risk transfer including the risk of benefit fraud. As previously explained in paragraph 33, this was critically important, particularly to the BA. Pathway also had to be acceptable on a number of factors, including cost, technical acceptability, and usability by agents and customers, and the potential to develop partnerships.

Implementation of Horizon – May 1996 to February 1997

46. After BA and POCL had jointly awarded the contract to Pathway in May 1996, the implementation of Horizon begun. There were some known risks with the implementation (as set out above) and some which emerged, including that Pathway underestimated the difficulties with roll out to Post Offices and the training time required.

47. Some post offices were not easily suitable for IT infrastructure, as they did not have the necessary space or equipment. Moreover, Pathway underestimated the amount of new software development needed from its sub-contractors e.g. Escher. A further issue was that the BA/DSS Customer Accounting and Payments System ("**CAPS**") which was to feed data to

Pathway's Card systems, was not ready for the new automation (please see para 1.13 of the NAO report WITN0403_01/2, POL00000805).

48. During the early implementation of Horizon, following evaluation and contract award, I was appointed Partnership Development Director in September 1995 reporting to POCL's Resources Executive Director, who had also previously chaired the Evaluation Board (see paragraph 6 above). In April 1996, I was then appointed Development Director, reporting to POCL's MD (see paragraph 7 above) as a member of its executive. I was responsible for the day-to-day sponsorship, inter alia, of the PDA on behalf of POCL. The PDA formally reported to the multi organisation PDA Board of which I was a member. The PDA Board reported to the multi organisation PSC (see paragraphs 29 and 30 above). Therefore, although I had a certain mandate from POCL, I was not the ultimate decision maker.

49. In late 1997, following the diminution of the PDA, POCL appointed its own Horizon Programme Director to focus on implementation for POCL, reporting himself to POCL's MD. My focus was then on strategic or commercial issues in relation to Horizon for POCL.

50. I would like to clarify that Mena Rego did not replace me as POCL's Development Director at any point. Mena's role was Head of Horizon Development within the POCL and she reported to me, whilst I was the POCL Development Director. Mena Rego is described as my 'substitute' on

the Automation Transformation Steering Group at page 9 of the Report on Automation Change Programme and Control (WITN0403_01/18, POL00031271) because she would have acted on my behalf if I was unable to attend a meeting.

Development and Testing of Horizon – February 1997 to Spring 1998

51. The extent I was involved in the development and testing of Horizon was as a member of the PDA Board. I received testing reports as part of the monthly progress reports received by the Board. There were two types of testing undertaken: 1) testing to ensure usability of the system; and 2) "end to end" testing to ensure that the authorisation systems were working for the BA, and, for example, to check that individuals were not being authorised twice for benefits.

52. I also kept an eye on the progress in relation to technical concurrences by discussing these with our IT colleagues. This can be seen for example in my Horizon Technical Concurrence note of 3 March 1997 (WITN0403_01/19, POL00028142) which sought to identify specific timed deliverables on issues around additional technical testing and monitoring.

53. In my role as POCL sponsor for the PDA, I helped to ensure that the proper testing methodology was in place, and remained uncompromised despite delays. We included a staged approach to rollout, with a limited number of post offices participating at each stage. This was so we could ensure that

testing was accurate and the system was acceptable to users (please see paragraph 66).

54. In 1997, it was decided by the PDA with sponsor support that there would be a series of re-plans, the first of which was in February 1997. By spring 1997, the project underwent a 'no fault replan'. Version 3 of this 'no fault replan' can be seen at WITN0403_01/20, POL00028186. The multi-organisational PDA liaised with ICL, and debated and approved this replan, as can be seen in the ICL Pathway Monthly Progress Report of February 1997 (WITN0403_01/21, FUJ00079044) and page 5 of the PDA Board Meeting minutes of 20 March 1997 (WITN0403_01/22, POL00028158).

55. Bird and Bird commissioned an independent report of the project in March 1998, and this was completed by Project Mentors. Page 7 of the draft of the Independent Review report (WITN0403_01/23, POL00038828) provides a useful explanation of some of the causes of this replan. The main catalyst for the replan was the existence of slippages in the rollout timetable. Bird and Bird attribute the majority of these delays to the fact that Pathway "seriously under-estimated the effort and time needed to develop the services when they prepared their proposal" and since the replan in February 1997, did not allocate "sufficient resources to complete their contracted obligations within the agreed timescale." I also recall that there was an issue with Escher, one of Pathway's sub-contractors, which meant that software integration was not as simple as Pathway had initially anticipated.

56. As can be seen on page 10 of the draft report (WITN0403_01/23, POL00038828), both BA and POCL were willing to scrutinise and re-examine our actions leading to the no-fault replan in case there were any lessons we could learn or changes that needed to be made. Taking note of Pathway's programme review that the biggest cause of delay was security, the PDA Board decided to commission a review of BA/POCL Security Requirements from PA Consulting Group. Our objective was to check that our initial Security Requirements had been appropriate for a PFI procurement of this nature. The PA Consulting report dated October 1997 (WITN0403_01/17, POL00028092) found no justification in Pathway's claims and no fault in PDA or Sponsor actions.

57. The causes of the delay in the Horizon roll out were the same as the causes of the no-fault replan (the replan took place because of delays).

58. DSS BA, POCL and ICL all felt the impact of the Horizon delays. For DSS BA, these delays materially damaged their business case for the project. BA had been predicting a fraud saving of £15 million per month according to the NAO report (WITN0403_01/2, POL00000805) with the new card, which was by this point seriously delayed. My perception at the time was that the delays seriously damaged the confidence and political will within DSS. BA began to reconsider their future involvement in the project. In 1992 before the genesis of the project, BA had favoured an earlier and much more wide-ranging use

of ACT, and this option was looking more and more appealing especially since their systems were now better able to cope with large-scale automation. Evidence to show DSS' diminishing confidence in the project can be seen in the later letter from Stuart Sweetman regarding POCL's position on negotiations with ICL dated December 1998 (WITN0403_01/24, POL00028326). I have now seen this document, which highlights the risks of continuing with the project from DSS' perspective.

59. For ICL Pathway, the delays damaged cash flow. Due to the PFI nature of the contract, Pathway had yet to be paid the amount of money that they were expecting for the project at the outset.

60. The delays were damaging for POCL too as they delayed other functionality planned in future releases and the national network. POCL had initially planned for automation to extend beyond the benefits payment card to other areas of the Post Office. The delay in the Horizon project pushed back this automation and started to affect POCL's market position and other commercial services we wanted to be able to offer.

61. The PDA, with sponsor support, decided that it was preferable not to litigate, but rather to conduct a replan on a 'no fault' basis with additional resources promised (please see paragraph 54 above). However, to retain the possibility of litigation in future, a formal breach of contract notice was issued by PDA to

ICL Pathway on behalf of all sponsors in November 1997. A copy of this breach of contract notice can be seen at WITN0403_01/25, POL00028442.

62. Throughout 1997, it was reported to the PDA Board that there were some technical difficulties with Horizon. The first difficulty experienced was that there was a difficulty in signing off "end to end" security for BA (i.e. ensuring that benefits transactions and their authorisation were secure). A second difficulty was that the software development was behind schedule for POCL assurances. A third difficulty was the practical installation of the system. As seen in paragraph 47 above, the Post Office network was vast and not all offices had the same level of space and equipment. This, along with other factors such as problems with utility companies, led to installation difficulties.

63. At this point, it is crucial to mention that an Independent Report conducted by PA Consulting dated October 1997 (WITN0403_01/17, POL00028092) found no fundamental technical issues with the system. However, it did mention that there needed to be commitment from all three parties for the system to succeed.

64. Despite the technical difficulties experienced, POCL refused to shift our insistence on proper and thorough testing before approval releases or rolling out to more post offices. This can be seen in the PDA Board minutes from August 1997 (WITN0403_01/26, POL00028311) paragraph 2.3 where it is explained that more emphasis was being placed on live trial and quality

rather than speed. We were unwilling to forsake this testing for the sake of completing the roll out of the project at an earlier date.

65. Moreover, in order to improve testing, we initiated a Review of Testing.

Subsequently, representatives from ICL Pathway and PDA Security teams were tasked with producing joint proposals for ensuring that any security related problems were identified early and that appropriate planning activity was undertaken (see the minutes of the PSC Meeting dated 24 September 1997 (WITN0403_01/27, POL00028447) paragraph 3.1.3).

66. Alongside this increase in testing, in order to address the technical

difficulties, we created a more realistic replan of future schedules in terms of timing and scope. We shifted the timescales and scaled down the number of operational post offices we wished to achieve by the end of each month.

Evidence of this can be seen in the PDA Board minutes from 15 July 1997 WITN0403_01/28, POL00028317 e.g. in Matters arising and at paragraph 2.4.5; and at page 2 of the Minutes of the PSC Meeting of 15 July 1997 WITN0403_01/29, POL00028448.

67. We also created a more realistic replan in terms of the content that we

wanted within the post offices, focusing on a few key essential elements. An example of such contingency replanning can be seen on page 5 of WITN0403_01/30, POL00028534 which relates to a further software release (Congo Release 4 (Pathway 1c)) and fallback options where it is explained

that the focus was on testing and emphasis was placed on satisfactory resolution of priority faults and error correction.

68. This was my understanding of the technical difficulties with Horizon at the time but I would also add that those Post Offices to whom the service had been rolled out largely reported that it was going ok. They did not raise many technical difficulties and indeed many post offices who did not yet have access to the system were saying that they wanted it.

69. Furthermore, the natural forum to raise these difficulties would have been at the meetings between the National Federation of Sub-Postmasters ("NFSP") executives and the POCL Network Director (the Meetings of the Negotiating Committee). I have read the reports of these meetings provided to me by the Inquiry at WITN0403_01/31, NFSP00000137; and WITN0403_01/32, NFSP00000483. The only technical concerns raised in these documents were that the platform for CAPS was a long way behind schedule (page 8 of WITN0403_01/32, NFSP00000483) and that the Horizon platform was not capable of processing APT (automated payment of bills transactions) (WITN0403_01/32, NFSP00000483, page 8). I was not in attendance at these meetings and this is the first time that I have seen these reports.

70. For completeness, I have also read the internal NFSP National Executive Council meeting reports provided to me by the Inquiry (WITN0403_01/33, NFSP00000504; WITN0403_01/34, NFSP00000452; WITN0403_01/35,

NFSP00000468; and WITN0403_01/36, NFSP00000494). I have not seen these reports before and they span across the period from October 1996 to October 1997. Although reference is made to the delays in the Horizon roll out, no overriding technical issues were reported during this period. The only technical concerns mentioned are a passing remark of screens freezing (WITN0403_01/33, NFSP00000504, page 52), issues with CAPs (WITN0403_01/36, NFSP00000494, page 18), and a brief reference to a lack of APT machines in post offices (WITN0403_01/34, NFSP00000452, page 26) and the practicalities of installation. In fact, in the early meetings, the NSFP showed real support towards the Horizon project (WITN0403_01/33, NFSP00000504, page 7).

71. During this period in 1997 and early 1998, I had a small amount of engagement with government officials. I, along with Mena Rego, Dave Miller, Stuart Sweetman and potentially John Roberts, would receive calls from the DTI principal and his assistant. I was responsive to their requests but did not initiate contact during this period. I recall that Mena and the DTI assistant spoke more regularly, and that Stuart did have some face-to-face contact with ministers. The individuals within the POCL who would have had the most interaction with ministers would have either been the MD of POCL or the CEO of PO.

72. As a team we also created status reports for DTI ministers who had been engaged to work up options for ministers across government in view of

breach. An example of such status reports can be seen in the note of a telephone call dated March 1998 (WITN0403_01/37, POL00028639). This document records my providing DTI officials (in this case David Sibbick) with information so that the DTI could lay out options. These status reports were often requested by DTI officials on behalf of their Ministers.

Delays to the Horizon project - Spring 1998 to Autumn 1998

73. Between the spring and autumn of 1998, there were further delays to the revised Master plan dated April 1997.
74. During this period I remained on the PDA board, however I was brought into more and more strategic or commercial discussions to help inform decision authorities beyond the PDA Board. I gave my input into the PSC, the PO Board, the PO Board's own steering committee (named Counters Automation Steering Group ("CASG")), as well as cross-government forums advising Ministers. All of the input I gave was from a POCL point of view.
75. Relationships between ICL Pathway, BA and POCL were breaking down. As seen in a letter from Keith Todd (WITN0403_01/38, POL00031117), in March 1998 ICL Pathway refuted the breach of contract notice that had been issued by the PDA in November 1997 (as explained in paragraph 61 above), and asked for a different approach to the project that they believed was more true to PFI principles. In this letter, Pathway's CEO mentioned both BA and POCL were responsible for the project delays, but he placed the majority of the

blame on BA and asserted that they had misrepresented a true picture of the availability of their systems.

76. The Government considered strategic options to resolve the project delays.

In September 1998, the Chief Secretary to HMT appointed special advisor Graham Corbett to broker a new deal within one month between all parties. His brief was to determine the project's future, including its scope. This resulted in intense negotiations and a standstill agreement was reached stating that the parties would continue working together whilst the new deal was brokered (this standstill agreement is exhibited at WITN0403_01/39, POL00028444). BA had made it clear during these discussions that there would be no movement from them or DSS in terms of additional monies.

77. On 18 October 1998, Mr Corbett gave a report to the Chief Secretary at WITN0403_01/40, POL00028098 that no commercial agreement had been reached between POCL, BA and ICL Pathway. It can be seen in the report that POCL were prepared to amend some contract terms (e.g. contract length or refresh costs), however ICL Pathway refused to make realistic amendments to the contract. Mr Corbett made a commercial proposal that BA and POCL were prepared to accept (see Annex C), but ICL refused. Mr Corbett concluded by determining that the way forward was to continue the project, as it was likely to be of benefit to all.

78. As far as I am aware, during this period there were some technical difficulties experienced with the Congo 4 release. I do also understand that there were other technical difficulties experienced, such as those described on page 5 of the draft Project Mentors Independent Review (WITN0403_01/23, POL00038828).

79. In order to combat these difficulties, the release 2 of the Horizon programme was rescheduled and delayed. Eventually, in April 1999 the PDA and the Horizon Programme Director for POCL gave an assurance to BA and POCL that there would be a Release Authorisation. A letter from Dave Miller, Deputy Director BA/POCL to Vince Gaskell, CAPs & Cards Programme Director regarding this assurance can be seen at WITN0403_01/41, POL00028407.

80. There was also an offer by POCL in June 1998 to support in principle a migration from the benefit payment card to a smartcard/ banking system over the right period of time. This offer can be seen in the letter from Stuart Sweetman of POCL to Peter Mathison, Chief Executive of BA, at WITN0403_01/42, POL00028650. However, the new system needed to be practically feasible. POCL subsequently rejected several of the Treasury Working Group's proposals on the basis that they were too risky or not practically feasible, such as POCL becoming a regulated bank itself, or POCL bearing the risk for benefit fraud in post office benefit payments. For examples of these suggestions, please see Stuart Sweetman's letter to Steve

Robson of HM Treasury dated April 1999 at WITN0403_01/43,
POL00028574.

81. I have been asked by the Inquiry to describe the Treasury Working Group and my involvement in it. In order to try and resolve the project delays, HM Treasury ("**HMT**") employed a specialist advisor Adrian Montague. This then led to the creation of a HMT working group with DSS DTI BA and the Cabinet Office supported by KPMG. Notes from the second of these meetings which took place on 25 September 1998 are at WITN0403_01/44, POL00028091.

82. I contributed to the Treasury Working Group by giving my input on options as they were developed by KPMG and others. However, I was not the POCL representative and did not attend the Working Group, as this role was filled by another POCL Director, Jonathan Evans, who was the PO Network Director at the time.

83. I understand that the purpose of the Treasury Working Group was to consider various fallback options for their value for money, and the relative legal strength of the public sector case if it wanted to withdraw from the contracts in part or in full. The Group was then to propose to Ministers the best way going forward.

84. WITN0403_01/45, HMT00000008 is a report completed by KPMG for HMT in May 1999. It shows that in value for money terms, the best option was to

carry on with the benefit card in a delayed roll out. DSS strongly objected to this (please see the letter from Sarah Graham of DSS dated December 1998 at WITN0403_01/24, POL00028326) as it was not in their best interests, and sought to persuade others that a variation should be pursued without their involvement of a benefit card. I am aware that Ministers eventually agreed to one of those variants in around May 1999.

85. As far as I know, the Treasury Working Group did not explicitly consider technical difficulties with Horizon. However, access to published reports would have been made available to them.

Negotiations over the future of the Horizon project - November 1998 to December 1998)

86. During November and December 1998, I continued to give my input into the Treasury Working Group. I also helped the PO Board Members consider and respond to some of ICL's more radical commercial requests (a few of which are detailed in Graham Corbett's report at WITN0403_01/40, POL00028098).

87. I have been reminded of a further report from Bird & Bird dated 17 December 1998 (at WITN0403_01/46, POL00031114; and WITN0403_01/47, POL00038829) which was a provisional version of "Position paper on Requirements Analysis" based on an Independent Consultant's Review of the "Payment Card programme". I do not personally recall commissioning this review. I can see that it was sent to me on copy and as by this stage I

was only dealing with some strategic inputs, I would have been expected to pass it on to those who might have needed to take it into account. These would have been people responsible for deciding whether the system was fit for purpose, through testing and assurance principles processes laid down earlier, to authorise further releases or rollout to more post offices. It would appear I have circulated in my handwriting to Dave Miller (POCL Horizon Programme Director) and Mena Rego (POCL Head of Horizon Development) and filed it under a project code name too. Reading it again now, I note that the content focuses on the alleged failings of ICL adequately or in a timely fashion to undertake requirements analysis around BA's benefit encashment services. It does not appear that any account was taken of the PFI nature of the procurement. My recollection is that POCL did not necessarily agree with the report as proving the system was fundamentally technically flawed.

88. In addition, during these two months, I was involved in a peer review by POCL Finance Director of the best way forward in parallel with any negotiations. In early January 1999, we concluded that to continue with the project was the best option strategically for POCL (please see the POCL Finance Director's review of the POCL/ICL deal at WITN0403_01/48, POL00031230).

89. Furthermore, I was also involved in helping POCL's lawyers draft some very high level Heads of Term ("**HOT**") in early preparation for the contract discussions that would take place once a ministerial decision on the way

forward was made. A draft of this HOT dated January 1999 is at WITN0403_01/49, POL00031113. I was not involved in the later contract discussions, as I had moved to a different role by the time that these took place.

90. During late 1998, BA and POCL agreed that ICL had breached the contract and that we had a fairly strong case to terminate it if we wished. However, we did not agree between us about the grounds of the breach (please see the letter from Slaughter & May to David Sibbick at WITN0403_01/50, POL00038847) or whether to terminate it in part or in full. Additionally, BA and POCL did not agree strategically about the best thing to do regarding the future of the Horizon project. BA wanted to withdraw from the card and move to a much greater and faster ACT regime, and POCL preferred to keep the card within the programme and replan for a longer roll out and extended contract.

91. I have been asked by the Inquiry what I understand of technical difficulties with Horizon at this time. I am aware that testing for interfacing with POCL's system for transaction processing was not completed in November 1998 as planned. A letter from Dave Miller to a number of colleagues at WITN0403_01/51, POL00028421 confirms this.

92. I do not know personally how or when technical difficulties were communicated to government ministers and senior officials at this stage.

However, I do believe that senior officials (for example in the Treasury Working Group) were aware of these technical difficulties and delays arising from them.

93. I have been asked to describe ICL Pathway's proposed changes to the acceptance criteria for the Horizon system in November 1998 and how the Post Office responded. The accountability for deciding this would have been with the Horizon programme director and the residual PDA. I was not personally involved in the decisions around these proposed changes or the Post Office's response. I would only have been involved if there were strategic or commercial implications arising in my time, which I do not recall dealing with.

Negotiations over the future of the Horizon project - January 1999 to May 1999

94. As detailed in paragraph 9 above, by March 1999, I had been appointed to another role outside POCL, within the RM Group. From this date onwards, I was less involved in the Horizon project and by May 1999, I was no longer involved.
95. As mentioned in paragraph 88 above, I was involved in a peer review by POCL Finance Director. In early January 1999, we concluded that to continue with the project was the best option strategically for POCL.

96. During this period, I also gave my opinion on any new options for the future of the Horizon programme to PO Board Members as requested. Evidence of my doing this can be seen in my letter to Richard Close dated March 1999 at WITN0403_01/52, POL00028631.
97. In early 1999, the relationship between the Post Office and BA remained much the same as described in paragraph 90 above. It was announced in May 1999 that BA were withdrawing from the card and that ICL would continue to automate for POCL (please see the NAO report at WITN0403_01/2, POL00000805).
98. During this period, I recall having minimal personal engagement with government officials. I did write a letter to David Sibbick of the DTI responding to his request for our view on a commercial proposal from ICL (WITN0403_01/53, POL00028616). On the same day, after a conversation with David Sibbick, I reported the content of our discussions to the PO Chief Executive via fax (WITN0403_01/54, POL00028615). I provided my input where requested by colleagues, but beyond that I had very limited contact with government officials as I was in the process of moving roles.
99. I have no personal recollection of any live trial technical issues, which would have been under the supervision of the Horizon programme director. I note that in the Post Office Board paper (WITN0403_01/55, POL00028629) dated 15 April 1999, there is no mention of any insurmountable technical issues. If

there had been any concerning issues, I would have expected these to have been mentioned in the Board papers, especially considering the serious decisions they were facing at this time. However, it is worth noting that I had moved roles by the time of the live trial in September 1999.

100. Any technical issues that did exist would have been addressed by the usual testing and assurance methodology used by ICL, BA and POCL.
101. I imagine that technical issues with Horizon were communicated to government ministers and senior officials at this stage through the Treasury Working Group at a high level. As far as I can recall, I did not personally communicate any technical issues during this time.
102. I believe that the DSS withdrew from the Horizon project for the reasons outlined in paragraph 58 above. The delays in the project had materially damaged DSS's business case, and DSS now had a more improved CAPs system that meant that they could choose a new route of automation and move towards bank transfer payment systems.
103. The withdrawal of the DSS from the Horizon project did have a large impact on POCL. In the short term, it meant that a replan of the ICL release schedule and roll out was needed. It also led to a large financial hit on POCL's balance sheet at PO Board level. Page 42 of the NAO report (WITN0403_01/2, POL00000805) notes that in November 1999, POCL

recorded on their accounts an exceptional charge of £571 million "for acquiring an asset which does not at this stage yield sufficient income to justify the cost." In the medium term, POCL had to find other ways to support the network including gaining the possibility of new business for universal banking and other banking services, and becoming the retail gateway to government services. For the post offices most at risk by a loss of BA business, for example the smaller rural offices, a new way of supporting them for their social purpose would have to be explored.

Acceptance of the Horizon system – September 1999

104. As described in paragraph 9 above, in March 1999 I formally left POCL and moved to another role within the RM Group. Therefore, as far as I can recall, I did not participate in the decision to accept Horizon or the acceptance process. Although I received an email from Keith Hardie (Head of Public Relations and External Communications) regarding the further roll out of Horizon (WITN0403_01/56, POL00028463), I received this email for information purposes. I was one of several people who received this email and I had no active participation in the decision to roll out the system.
105. I cannot comment on technical difficulties with Horizon at this time as I had left POCL.

Engagement with the NSFP during the development and implementation of

Horizon

106. During the early development and implementation of Horizon (please see paragraphs 27 to 45), I was involved with the General Secretary of the NFSP in their discussions around BA's desire for an accelerated ACT programme. I explained the long-term solutions we were evolving in order to gain support.
107. After the contract was awarded to ICL, I along with other members of POCL occasionally met with NFSP to update them on the project's progress. ICL sometimes attended. A good example of this can be seen in the letter on NFSP future involvement in counter automation at WITN0403_01/57, NFSP00000120, which mentions an initiator meeting that took place in September 1996 between the NFSP, POCL and Pathway on a non-contractual basis to explain the project's intent and ambition.
108. ICL also organised user awareness events for sub-postmasters locally to explain the new incoming system. NFSP were aware of these meetings.
109. The NFSP would have typically raised any concerns they had via Post Office regional management. I am not aware of the NFSP raising any concerns about the technical viability and robustness of Horizon prior to its rollout (please see paragraph 69).

The end of my involvement in the Horizon project

110. As described in paragraph 9, my direct involvement in the Horizon project came to an end in March 1999 when I was promoted to MD of Customer Management for the RM Group (please see the PO Board Minutes of 27 April 1999 at WITN0403_01/58, RMG00000023). For the next few months until May 1999, I used my experience of the project to give input where called upon. In June 1999, I formally resigned from my POCL Development Director role. This was a Companies House resignation and I was no longer a POCL director.

111. I gave input to the PO Board on how the Horizon platform could be used as part of my new MD role in customer management (please see the PO Board Minutes of 14 March 2000 at WITN0403_01/59, POL00021469).

112. I was not aware of any technical difficulties during this period other than those previously mentioned in my statement.

Reflections

113. I can only reflect back on my time involved in the Horizon project, which ended in May 1999.

114. As far as I can recollect during this initial period, whilst I was involved, I do consider that the Post Office effectively scrutinised the technical integrity and

robustness of Horizon. Before release or roll out, a jointly resourced PDA team tested the Horizon system, and suitable assurances were given to sponsors. I cannot recall any material accounting or reconciliation issues from this time.

115. At each stage of the Horizon programme that I was involved with, professional advice was taken where necessary or to add value in reviews. Key stakeholders were advised openly and honestly about status and options going forward.
116. Had I been aware of material faults of the kind that we now know led to the unjust prosecution of so many sub-postmasters, I would have done all that was in my power to intervene and resolve these issues. As a social business associated with public sector values, it was not in the ethos of the organisation at that time to put expediency above quality. POCL strove to put its customers and its agents at its heart. I am truly baffled by the apparent later professional advice, investigative processes and governance that appears to have led to so many unjust prosecutions. It is not a culture I personally recognise.
117. I would like to express my sadness at the many lives that have been affected by the sub-postmasters' prosecutions. I will do all I reasonably can to assist the Chair in this Inquiry.

Statement of Truth

I believe the content of this statement to be true.

Signed: **GRO** (PAUL RICH)

Dated: 21st September 2022

Index to First Witness Statement of Mr Paul Rich

<u>No.</u>	<u>Exhibit Number</u>	<u>Document Description</u>	<u>Control Number</u>	<u>URN</u>
1.	WITN0403_01/1	Newsbrief number 86 to all senior staff re: BA/POCL	WITN04030101	WITN04030101
2.	WITN0403_01/2	NAO Report: The Cancellation of the Benefits Payment Card project published on 18 August 2000	VIS00001819	POL00000805
3.	WITN0403_01/3	The Future of Postal Services: A Consultative Document by the Department of Trade and Industry	RLIT0000002	RLIT0000002

4.	WITN0403_01/4	The Potential Automation of DSS Transactions (Option C), Meeting Notes, 30 July 1993	POL-0024619	POL00028137
5.	WITN0403_01/5	Report: Project Initiation Document produced by PDA November 1996	POINQ0068589 F	FUJ00079001
6.	WITN0403_01/6	Paper seeking Post Office Board authority to proceed with award stage of the BA/POCL Automation Programme (POB)(96)33	POL-0024932	POL00028450
7.	WITN0403_01/7	Investment Appraisal Commentary for BA/POCL Automation (MP(96)42A)	POL-0024934	POL00028452
8.	WITN0403_01/8	Bringing Technology to Post Offices and Benefit Payments:	POL-0024757	POL00028275

		Value Assessment Model (V.1.0)		
9.	WITN0403_01/9	Letter from Paul Rich re: IT Concurrence/ Supplier Evaluation	POL-0028181	POL00031279
10.	WITN0403_01/10	Memo from Basil Shall to Paul Rich (and others) re Strategic Concurrence Process and Supplier Requirements	POL-0028180	POL00031278
11.	WITN0403_01/11	Letter (part) from Bob King, Deputy Director BA/POCL Programme re Interfaces between POCL systems and PFI systems via TMS	POL-0028179	POL00031277
12.	WITN0403_01/12	Letter from Wendy Powney: BA/POCL IT Concurrence	POL-0028177	POL00031275
13.	WITN0403_01/13	Item 2 of Paul Rich's Letter "IT	POL-0028178	POL00031276

		Concurrence Meeting" dates 9 Feb		
14.	WITN0403_01/14	Evaluation Board Meeting Minutes, 26 February 1996	POL-0024770	POL00028288
15.	WITN0403_01/15	Post Office Board paper re BA/POCL Automation: Bringing Technology to Post Offices and Benefit Payment	POL-0028139	POL00031237
16.	WITN0403_01/16	Bringing technology to Post Offices and Benefit payment (Horizon): Revised business case for the automation of post offices and response to action points from MaPEC 30 April 1996	POL-0025602	POL00029120
17.	WITN0403_01/17	PA Consulting Group: Review of BA-POCL Programme 1	POL-0024574	POL00028092

		Oct 1997 and Outline of the Proposed End State and Transition Project for the Support of Automated Services, Post Office Counters Ltd, 29 June 1998		
18.	WITN0403_01/18	Report on Automation Change Programme and Control, dated August 1996	POL-0028173	POL00031271
19.	WITN0403_01/19	Horizon Technical Concurrence Report sent from Paul Rich to Mena Rego, 3 March 1997	POL-0024624	POL00028142
20.	WITN0403_01/20	Programme Delivery Authority Master Plan - Benefits Agency, Social Security Agency (NI), POCL (V3, final)	POL-0024668	POL00028186

21.	WITN0403_01/21	ICL Pathway 'Pathway Programme Monthly Report' (V1.0)	POINQ0068632 F	FUJ00079044
22.	WITN0403_01/22	BA/POCL Programme Development Authority Board Minutes of the Sponsor/PDA Board Meeting, 20 March 1997	POL-0024640	POL00028158
23.	WITN0403_01/23	Draft Report: Project Mentors Ltd, Independent Review of BA / POCL Programme	POL-0027614	POL00038828
24.	WITN0403_01/24	Letter from Sarah Graham of DSS to Peter Schofield, HMT, re BA/POCL Automation Project: Towards an Inter- Ministerial Decision	POL-0024808	POL00028326
25.	WITN0403_01/25	Letters from Peter Crahan, BA/POCL	POL-0024924	POL00028442

		Programme, to POCL and ICL Pathway re Related Agreements		
26.	WITN0403_01/26	BA/POCL Programme Development Authority Board Meeting Minutes, 21 August 1997	POL-0024793	POL00028311
27.	WITN0403_01/27	Dissemination of BA/POCL Programme Development Authority Steering Committee Meeting Minutes, 24 September 1997	POL-0024929	POL00028447
28.	WITN0403_01/28	BA/POCL Programme Development Authority Board Meeting Minutes, 15 July 1997	POL-0024799	POL00028317
29.	WITN0403_01/29	BA/POCL Programme Development Authority Steering Committee Meeting	POL-0024930	POL00028448

		Minutes, 15 July 1997		
30.	WITN0403_01/30	Congo 4 Fallback Option Outline Release Specification, 28 July 1997 (Draft B)	POL-0025016	POL00028534
31.	WITN0403_01/31	NFSP report of a joint meeting of the Negotiating Committee and Post Office Counters Limited on 3 June 1997	VIS00007585	NFSP00000137
32.	WITN0403_01/32	NFSP report of a meeting of the Negotiating Committee on 22 - 23 September 1997	VIS00008941	NFSP00000483
33.	WITN0403_01/33	NFSP report of a meeting of the National Executive Council on 21, 22, 23 October 1996	VIS00008962	NFSP00000504
34.	WITN0403_01/34	NFSP Meeting	VIS00008910	NFSP00000452

		Report of National Executive Council on 16-18 June 97		
35.	WITN0403_01/35	Report of NFSP NEC Meeting 5-7 January 1997	VIS00008926	NFSP00000468
36.	WITN0403_01/36	Report of NFSP National Executive Council Meeting 20-22 October 1997	VIS00008952	NFSP00000494
37.	WITN0403_01/37	Note of telephone call between David Sibbick, DTI, and Paul Rich, POCL, re Horizon, 18 March 1998	POL-0025121	POL00028639
38.	WITN0403_01/38	Letter from Keith Todd to Stuart Sweetman dated 10/03/1998 enclosing original letter to Peter Mathison dated 06/03/1998 and ICL	POL-0027601	POL00031117

		Position Paper on the Pathway Project		
39.	WITN0403_01/39	Standstill Agreement between Secretary of State for Social Security, POCL and ICL Pathway sent from Hamish Sandison to George McCorkell (BA) and Paul Rich (POCL)	POL-0024926	POL00028444
40.	WITN0403_01/40	Summary and Report to Chief Secretary by Independent Advisor, Graham Corbett on Horizon Project, 16 Oct 1998	POL-0024580	POL00028098
41.	WITN0403_01/41	Letter from Dave Miller, Deputy Director BA/PCOL to Vince Gaskell, CAPS & Cards	POL-0024889	POL00028407

		Programme Director re Horizon Testing and Entry to Live Running - Position for the RAB		
42.	WITN0403_01/42	Letter from Stuart Sweetman, POCL, to Peter Mathison, Chief Executive of Benefits Agency re Horizon & Treasury Review, 18 June 1998	POL-0025132	POL00028650
43.	WITN0403_01/43	Letter from Stuart Sweetman, POCL Managing Director, to Steve Robson, HM Treasury, 9 April 1999, re POCL's position on negotiations with ICL on Government's 'preferred' alternative	POL-0025056	POL00028574

44.	WITN0403_01/44	Fax from Adam Sharples, Public Enterprise Partnerships Team to members of the Working Group re Horizon Working Group, meeting minutes dated 25/09/1998 and timetable	POL-0024573	POL00028091
45.	WITN0403_01/45	Report by KPMG for HMT: BA/POCL - Comparison of Options	VIS00007773	HMT00000008
46.	WITN0403_01/46	Memorandum : Bird and Bird to BA / POCL enclosing independent report into Horizon Project, 18 December 1998	POL-0027598	POL00031114
47.	WITN0403_01/47	Handwritten Note: Addressed to Dave [Miller] enclosing copy of	POL-0027615	POL00038829

		Project Mentors Report of December 1998.		
48.	WITN0403_01/48	Review of the POCL/ICL Pathway Deal by Roger Tabor, Finance Director POCL (January 1999)	POL-0028132	POL00031230
49.	WITN0403_01/49	Letter from Paul Rich to Keith Baines re Draft of the Non-Binding Heads of Terms POCL/BA/ICL and index and Acceptance Flowchart	POL-0027597	POL00031113
50.	WITN0403_01/50	Letter from Jeff Triggs (Slaughter & May) to David Sibbick, copied to others, dated 13/05/1999 re possibility of litigation in relation to Horizon.	POL-0027633	POL00038847

51.	WITN0403_01/51	Letter from Dave Miller to a number of colleagues re Horizon Testing	POL-0024903	POL00028421
52.	WITN0403_01/52	Letter from Paul Rich to Richard Close re Horizon Options B, 31 March 1999	POL-0025113	POL00028631
53.	WITN0403_01/53	Letter from Paul Rich to David Sibbick, DTI, re Deferred Payment Proposal from ICL and ICL Pathway-Deferred Payment Terms, 10 May 1999	POL-0025098	POL00028616
54.	WITN0403_01/54	Redaction of fax no., direct dial and signature under GRO para 5	POL-0025097	POL00028615
55.	WITN0403_01/55	Email from Stuart Sweetman to John Roberts attaching Post Office Board Paper: The	POL-0025111	POL00028629

		Future for Horizon (POB(99)o/s, draft), 15 April 1999		
56.	WITN0403_01/56	Email from Keith Hardie, Head of PR & External Communications at POCL to POCL employees re Horizon Acceptance Update	POL-0024945	POL00028463
57.	WITN0403_01/57	Letter on NFSP future involvement in counter automation from Colin Baker to National Executive Council with attached letter from Paul Rich and slides from ICL presentation to NFSP	VIS00007568	NFSP00000120
58.	WITN0403_01/58	Minutes: Post Office Board Minutes of 27/04/1999	VIS00007431	RMG00000023
59.	WITN0403_01/59	Post Office Board	POL0000002	POL00021469

		Minutes of 14/03/2000		
--	--	--------------------------	--	--