1   **Thursday, 27 October 2022**
2   (10.17 am)
3   MR BLAKE: Good morning, sir.
4   SIR WYN WILLIAMS: Good morning.
5   MR BLAKE: Today's first witness is Terence Austin.
6   SIR WYN WILLIAMS: Yes.
7   **TERENCE AUSTIN (affirmed)**
8   **Questioned by MR BLAKE**
9   MR BLAKE: Thank you very much. Could you give your full
10   name, please.
11   A.   Terence Paul Austin.
12   Q.   Mr Austin, in front of you should have a witness
13   statement?
14   A.   Yes, I do.
15   Q.   Could I ask you to turn to the final page, that's
16   page 19. Can you confirm that that is your signature?
17   A.   Yes, it is.
18   Q.   It's dated 13 September of this year; is that right?
19   A.   That's correct.
20   Q.   Is that statement true to the best of your knowledge and
21   belief?
22   A.   It is.
23   Q.   Thank you, Mr Austin.
24   For the purpose of the transcript the statement is
25   WITN04190100. Mr Austin, that statement and its

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1   exhibits will go into evidence, so I'm not going to
2   repeat lots of matters that are contained therein.
3   We're going to spend about half a day going through
4   various matters. I'm going to start with your
5   background.
6   You spent 40 years in the IT sector; is that right?
7   A.   That's correct.
8   Q.   You joined ICL as a programme director in 1995?
9   A.   Correct.
10   Q.   You were employed specifically to deliver the benefit
11   card and the Electronic Point of Sale System; is that
12   right?
13   A.   The whole solution with regard to the ITT.
14   Q.   So I think you said you were responsible for delivering
15   the IT Pathways solution; is that right?
16   A.   Yes, correct.
17   Q.   You became systems director at some point.
18   A.   Yes, there was a period of time, several months after we
19   started, after award of contract, where it was obvious
20   that the requirement was expanding tremendously and it
21   was felt that we should reorganise the team so that
22   I would then take responsibility for the solution and
23   that one of my colleagues would come in and take over
24   the position as a programme director, so I relinquished
25   areas such as implementation, training, business

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1   requirements, et cetera, so that they went elsewhere
2   within the ICL Pathway organisation.
3   Q.   You left in October 2000?
4   A.   I did.
5   Q.   Would it be right to say that you were the senior
6   technical director of the Horizon programme?
7   A.   No, it wouldn't.
8   Q.   Were you the most senior individual who had
9   responsibility for the IT Pathway solution within ICL?
10   A.   Yes.
11   Q.   Were you part of the management structure?
12   A.   I was.
13   Q.   Were you happy with how ICL was being managed at the
14   time?
15   A.   Yes. I was recruited specifically for the ICL Pathway
16   project.
17   Q.   Did you have faith in its internal controls and internal
18   processes as a company?
19   A.   I was not familiar with the internal processes because
20   I was brought on specifically to look at the ITT for the
21   ICL Pathway programme.
22   Q.   But as your career developed, did you have faith in
23   the --
24   A.   Within the ICL Pathway?
25   Q.   Yes.

3

1   A.   Yes.
2   Q.   Did you think it was a good company at scrutinising
3   itself?
4   A.   Yes.
5   Q.   Did it have an effective audit process, for example?
6   A.   ICL itself?
7   Q.   Yes.
8   A.   I wasn't aware of it, but I assume there was. We
9   introduced our own within ICL Pathway.
10   Q.   So within ICL Pathway, were you happy with the audit
11   process?
12   A.   Yes.
13   Q.   Can we look at FUJ00080690. This is the EPOSS PinICL
14   task force report. You can ignore, I think, the date on
15   the top right-hand corner because the EPOSS PinICL task
16   force was, as it says on the front page, in place
17   between 19 August and 18 September 1998. Do you
18   remember this document?
19   A.   I do.
20   Q.   Do you remember seeing the document at the time?
21   A.   I do.
22   Q.   It has your name on the distribution. Can you tell us
23   about the authors -- the author, if we just look below
24   that, it has J Holmes and D McDonnell. J Holmes is,
25   I think, Jan Holmes, I think we have been pronouncing it

4

1   Jan but it is Jan Holmes?
2 **A.** It is.
3 **Q.** He was the audit manager; is that right?
4 **A.** He was.
5 **Q.** Who was D McDonnell?
6 **A.** That was another person within the audit team, as far as
7   I can recall.
8 **Q.** Do you think he was the deputy development manager? Is
9   that a title you remember?
10 **A.** I remember the title, but I don't remember the name, I'm
11   afraid.
12 **Q.** From what you have said about the audit process at
13   ICL Pathway, presumably you had faith in them in
14   carrying out that task?
15 **A.** Well, I was the instigator of the task force.
16 **Q.** Yes, so you appointed the right individuals to carry out
17   that task?
18 **A.** Yes, which was Jan.
19 **Q.** Of drafting the report.
20 **A.** Yes.
21 **Q.** Did you have any reason not to believe what they said in
22   the report?
23 **A.** The reason I hesitate is that auditors are not technical
24   people. They interview people and they draw conclusions
25   and they then summarise those conclusions and their

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1 recommendations.
2 **Q.** But I think Jan Holmes was the auditor but Mr McDonnell
3   was --
4 **A.** A deputy development --
5 **Q.** -- a technical man. Can we look at page 4 of that
6   document, please. This is the introduction and I'm
7   going to just read from the second paragraph for the
8   purpose of the transcript. It says:
9   "This report presents the outcome of the Task Force
10   activity and identifies factors which prevented the
11   original target (zero or near to zero residual PinICLs)
12   being met."
13   Now, PinICLs are error logs or --
14 **A.** Defects, yes.
15 **Q.** "During the course of the Task Force it became clear
16   that there are significant deficiencies in the EPOSS
17   product, its code and design, and these are also
18   presented in this report. Finally the report contains
19   recommendations from the authors which we believe should
20   be implemented by the programme to address the
21   shortcomings identified."
22   So that's the very first section of this 20-page
23   document and it is highlighting there that there were,
24   in their view, significant deficiencies in the EPOSS
25   product, its code and design; do you agree with that?

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1 **A.** Absolutely, yes.
2 **Q.** Can we turn over the page to page 5, please, and the top
3   half of that page. In summary, it says there that they
4   had spent five weeks trying to get the PinICLs down to
5   zero and it is the second paragraph there:
6   "The position at 1300 hours on 18th September is
7   that 166 PinICLs have been fixed and closed and 165
8   remain in WIP."
9   Is that "work in progress"?
10 **A.** Yes.
11 **Q.** "This indicates that the Task Force has failed to meet
12   its primary objective."
13   So they closed 166, but 155 *(sic)* remained,
14   presumably that indicates a significant remaining
15   problem, despite the task force having --
16 **A.** It does.
17 **Q.** -- closed a number of PinICLs?
18 **A.** It does.
19 **Q.** Moving over to page 7 of this report, there is a section
20   on EPOSS code and, again, for the purpose of the
21   transcript, I appreciate it's a relatively long passage,
22   but I'm going to read it, it says:
23   "It is clear that senior members of the Task Force
24   are extremely concerned about the quality of code in the
25   EPOSS product. Earlier this year the EPOSS code was

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1 re-engineered by Escher and the expectation is that the
2   work carried out in Boston was to a high standard and of
3   good quality. Since then many hundreds of PinICL fixes
4   have been applied to the code and the fear is that code
5   decay will, assuming it hasn't already, cause the
6   product to become unstable. This present [I think that
7   means 'presents'] a situation where there is no
8   guarantee that a PinICL fix or additional functionality
9   can be made without adversely affect [I think it means
10   'affecting'] another part of the system.
11   "However, a more worrying concern from the
12   Programme's perspective should be the reliance on the
13   EPOSS product in its current state as a basis for
14   planning and delivery. During the Task Force there was
15   relatively little testing that directly impacted EPOSS
16   and yet [over] 200 PinICLs, roughly 50 per week, were
17   raised. Immediately following the conclusion of the
18   Task Force it is intended to re-run System Test Main
19   Pass and various other test streams. While I am
20   confident that the fixes delivered by the Task Force
21   will prove to be reliable, I fully expect the PinICL
22   rate to increase as further testing is carried out."
23   Now, concerns that were expressed there include that
24   the code will decay; do you remember that?
25 **A.** I do.

8

1   Q. That's, I think, a term that's used to describe where

2   there's a reduction in reliability and effectiveness --

3   A. That's what it is implying, yes.

4   Q. -- over time and that could, for example, affect things

5   like the cash and counter performance, potentially.

6   A. Potentially, yes.

7   Q. Can we look at page 17 of the same document please,

8   paragraph 7.3, "Existing Code":

9   "NB: This section has been produced with the

10   assistance of Dave McDonnell and Martin Smith and their

11   combined experience of structured programming."

12   Do you remember who Martin Smith was at all?

13   A. He would be one of the team, one of the programmers.

14   Q. So, again, two technical experts?

15   A. Yes.

16   Q. They say:

17   "Although parts of the EPOSS code are well written,

18   significant sections are a combination of poor technical

19   design, bad programming and ill thought out bug fixes.

20   The negative impact of these factors will continue and

21   spread as long as the PinICL fixing culture continues.

22   This is partly due to the nature/size of the bug-fixing

23   task and partly due to the quality and professionalism

24   of certain individuals within the team."

25   Then over the page:

<div align="center">9</div>

1   "Whoever wrote this code clearly has no

2   understanding of elementary mathematics or the most

3   basic rules of programming."

4   That's all pretty damning, isn't it?

5   A. Very much so.

6   Q. Presumably, that would have been quite well-known

7   amongst the team at the time?

8   A. Maybe amongst the team but not amongst the management

9   part of the team.

10   Q. So I think if we turn to the first page of this document

11   it shows the distribution. There is yourself there,

12   Mr Bennett, Mr McDonnell and then it says "Library". Do

13   you know what that was a reference to?

14   A. It will be stored in the library of the audit team,

15   I believe.

16   Q. Would the information from this report have been -- you

17   say it was known to the team. Who would have known

18   about --

19   A. Well, the reason for me asking for the task force in the

20   first place was that I wasn't very happy with the way

21   the product was, so I felt let down by the people who

22   had developed it, who were supposed to be experts in

23   their field. So because I was getting reports that the

24   product was not stable and that it was not behaving in

25   a way that we would expect, I called the task force.

<div align="center">10</div>

1   So I called the task force together and brought in

2   the people who I thought were the most competent people

3   within my team to be able to look into this and see what

4   was going on, and it was as a result of that that Jan

5   writes a report at the end of their activity and when

6   I received this report, which was, as you quite rightly

7   say, "very damning", and a massive worry to me and the

8   rest of ICL Pathway, we had to take every part of it

9   extremely seriously.

10   So we took -- I called in all the members of the

11   task force and my lead designer and we went through

12   every element of it to find out what we could do and

13   what options we had to do.

14   We identified who the people were that were

15   responsible for producing the product in its particular

16   state and they were removed from the team, so that we

17   were starting off with a different team that was looking

18   at it and designing it and managing it.

19   Q. Do you remember who was removed from the team at all?

20   A. No, I'm sorry, I can't. I genuinely can't.

21   Q. So this was 1998?

22   A. Yes.

23   Q. We then have another report in 1999 that I would like to

24   take you to, that's --

25   A. First of all -- sorry to interrupt, I would just like to

<div align="center">11</div>

1   say that, as a result of the various meetings following

2   this, we went into a corrective action plan. So we

3   decided what actions we needed to take in order to get

4   the product into the state that we were happy with.

5   Q. So let's look what happened a year later, 1999, and that

6   is FUJ00079782. This is the "CSR+ Development Audit".

7   Very briefly, can you tell us what CSR+ was?

8   A. Core System Release, I believe.

9   Q. That was also conducted by Jan Holmes, if we scroll down

10   a little bit; so the audit manager conducted this audit.

11   A. Yes.

12   Q. Can we look at page 6, please, and scroll down to the

13   bottom of the page. There's a section on "Audit

14   Conduct" and how the audit was conducted. It explains

15   there that there were some 35 interviews over

16   a four-week period between September and October 1999,

17   so quite a comprehensive audit?

18   A. Absolutely, yes.

19   Q. As I said, this is a year on from the Holmes/McDonnell

20   report that we just saw.

21   A. But this is an audit of the entire release, so it's the

22   entire product, not just the EPOSS product.

23   Q. Yes. Can we look at page 7, please, and 2.5. This

24   addresses "Next Steps", and it says there, in the first

25   paragraph, that there was an opportunity during the week

<div align="center">12</div>

1   of 8 November to challenge any recommendations that were
2   made in that report.
3   It is page 19 -- as you say, there are plenty of
4   pages that address other aspects of CSR+, and it is
5   page 19 that addresses EPOSS. Again, I'm going to read
6   a fair bit out, I'm afraid. It says:
7   "From the CSR+ perspective the development of the
8   EPOSS product has been successful with software drops
9   being made according to planned schedules and confidence
10   in the team that future drops will also be achieved on
11   time.
12   "Unfortunately EPOSS continues to be resource hungry
13   in dealing with live problems associated with CSR and in
14   ensuring that these fixes are brought forward and
15   incorporated into the CSR+ product.
16   "The EPOSS task force report [which we have already
17   seen] raised the question of the maintainability and
18   resilience of the EPOSS code following the 6 week PinICL
19   blitz where some 550 PinICLs were processed. Since then
20   [so a year later] a further [approximately] 996 PinICLs
21   have been raised -- using the 'Product = EPOSS and
22   Target Release = IR-CSR or PDR-CSR' search criteria --
23   and these can only have had a detrimental effect on the
24   quality of the code. In particular the maintainability,
25   resilience and potential for change aspects must be

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1   subject to doubt. The report also identified many
2   instances of poor programming technique and application
3   of coding standards and while CSR+ changes have been
4   reviewed by the Team Leader, no attempts have been made
5   to address the significant body of code not affected.
6   There is also anecdotal evidence that EPOSS components
7   used by other applications are fragile and cause
8   problems for the calling application, Print Server was
9   mentioned by both LFS and APS Counter teams."
10   So "resource hungry", it sounds as though it
11   required a lot of attention; is that right?
12 A. That's correct.
13 Q. It has been -- well, there are 996 more PinICLs that
14   have been raised, so it's got worse since that EPOSS
15   task force were carrying out their job, in terms of the
16   number of PinICLs at least; would you agree with that?
17 A. That's correct.
18 Q. "PinICL fixes can only have a detrimental effect on the
19   code", presumably, again, that's a reference to code
20   decay or something similar to that?
21 A. Correct.
22 Q. It says:
23   "... CSR+ changes have been reviewed by the Team
24   Leader ..."
25   Who was that "Team Leader" a reference to, do you

14

1   know?
2 A. I would imagine that would be Steve Warwick.
3 Q. Can we go over the page, please:
4   "The figures indicate that the problems facing EPOSS
5   during the Task Force period have not diminished. Of
6   greater concern are the non-EPOSS PinICLs within the
7   group suggesting that there are still serious quality
8   problems in this vital, customer facing element of the
9   system."
10   Then there's a box there and the box says:
11   "The EPOSS Solutions Report made specific
12   recommendations to consider the redesign and rewrite of
13   EPOSS, in part or in whole, to address the then known
14   shortcomings. In light of the continued evidence of
15   poor product quality these recommendations should be
16   reconsidered."
17   Now, is that box a recommendation?
18 A. It's saying that we should reconsider the rewrite
19   option.
20 Q. But I think we saw at the beginning of this report that
21   there was an opportunity to object to particular
22   recommendations by 8 November. I think it was talking
23   about those kinds of things, wasn't it, as
24   a recommendation?
25 A. Yes. Actually, the fact -- what I'm finding -- yes, I'm

15

1   struggling because this was a massive issue for me and
2   I discussed it with all my technical team in-depth.
3   Rewriting a product is not necessarily a solution in
4   itself because you can reintroduce problems, or you can
5   have people who don't understand the requirement as
6   well, and you can actually end up with a product that's
7   even maybe a little better but not necessarily any
8   better.
9   My preferred solution at the time, having spoken to
10   all the people, is that the decay was in certain parts
11   of the product and we should focus our efforts and see
12   if we can stabilise those parts that were causing the
13   majority of the PinICL. In fact, this was a view
14   strongly felt by Steve Warwick, who I had a lot of
15   respect for.
16 Q. We will come to see how your view was that you weren't
17   in favour of a rewrite?
18 A. Well, not initially. It was still an option on the
19   table. I hadn't dismissed it. I just felt it wasn't
20   necessarily -- we should explore other avenues first
21   before taking that pretty drastic course of action.
22 Q. But it was a recommendation from ICL Pathway's auditor
23   Jan Holmes?
24 A. It was a recommendation.
25 Q. Yes. Can we look at page 47 of this document, please.

16

1   These are the terms of reference of the audit and can we
2   look over the page to "Reporting". It says there:
3   "A final report will be produced and distributed to
4   the Director and Senior Managers of the Development
5   Directorate, as well as the Managing, Deputy Managing
6   and QRM directors."
7   Then it has a list of the distribution -- at least
8   of the terms of reference and you are listed there
9   first. Now, it's not in alphabetical order but you're
10   first. Is that because you were the most senior or that
11   it was most appropriate to you?
12   **A.** No, Mike Coombs was the most senior. It was because it
13   was most appropriate to me.
14   **Q.** Thank you. Can we please go to FUJ00079783, please.
15   This was a month later and, following the audit, there
16   were a list of corrective actions that needed to take
17   place and this sets those out. So I think, effectively,
18   it sets out the recommendations and what's being done
19   about them.
20   You are listed as a recipient and throughout this
21   report you are, I think, TPA; is that right?
22   **A.** That's correct.
23   **Q.** Can we look at page 3, please, and down to the "Key to
24   plan". Now, there are various shorthand terms
25   throughout this document and one of them is "Owner",

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1   which is "The identified owner of the corrective
2   action", and the other is "MTM", "Management Team Member
3   to whom the CA Owner reports". So there's a distinction
4   between somebody who effectively takes ownership of the
5   recommendation and the person that manages the relevant
6   team or relevant person; is that right?
7   **A.** Yes, yes.
8   **Q.** Could we scroll down, is that possible, over to the next
9   page. So these are various recommendations. We see
10   there 3.2, 3.3, I think 3.4, also, were recommendations
11   relating to various documentation that needed to be
12   actioned and you are there as the MTM, so there you're
13   taking the management responsibility for those issues.
14   **A.** Yes.
15   **Q.** Can we keep on scrolling to page 6, please. That's
16   4.2.1, thank you very much. There you are the owner of
17   this particular issue; is that right?
18   **A.** That's correct.
19   **Q.** Can we just look at the left-hand side. It says:
20   "The audit identified that EPOSS continues to be
21   unstable. PinICL evidence illustrated the numbers of
22   PinICLs raised since the 1998 Task Force and the rate of
23   their being raised.
24   "The EPOSS Solutions Report made specific
25   recommendations to consider the redesign and rewrite of

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1   EPOSS, in part or in whole, to address the then known
2   shortcomings. In light of the continued evidence of
3   poor product quality these recommendations should be
4   reconsidered."
5   So that's effectively what we saw in that audit from
6   Jan Holmes and you are down there as the owner of that
7   particular recommendation.
8   **A.** The recommendation was to consider a rewrite.
9   **Q.** Yes. Can we look on the right-hand side. Is it
10   possible to blow up that right-hand side? There are
11   certain things there that I think I'm going to need your
12   help with because I don't quite understand. Let's see
13   where we get to. 17 November:
14   "This action falls within Development but requires
15   higher level drive. Has links with CS and BD."
16   Do you remember what that means at all?
17   **A.** "CS", I think, is customer services and "BD" is business
18   development.
19   **Q.** Thank you:
20   "MJBC to speak with TPA direct."
21   Is that --
22   **A.** Mike Coombs.
23   **Q.** Mike Coombs, thank you very much. 25 November:
24   "Work on AI298 identified that majority of problems
25   ([approximately] 80%) were to do with error and printer

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1   error handling. Daily meetings had been instigated.
2   TPA of view that while original code had not been good
3   it would be difficult to justify the case for rewriting
4   now."
5   So I think it's right to say that in November,
6   towards the end of November, you were of the view that
7   a rewrite wasn't your preference?
8   **A.** It was a very risky thing to do and if the judgement was
9   that 80 per cent of the errors were down to error
10   handling and printer handling, printer error handling,
11   then we should attack that part of the Code and probably
12   rewrite that.
13   **Q.** I mean, that would still leave 20 per cent, of course?
14   **A.** Yes, it would.
15   **Q.** There's an email issued by yourself, I think, and that
16   says:
17   "We have not formally closed down the recommendation
18   that we re-engineer the EPOSS application due to its
19   inherent instability. Since this recommendation was
20   made, a number of events/actions have taken place. We
21   embarked upon a major maintenance exercise for LT2 which
22   targeted several known stability issues. In parallel,
23   we carried out a defensive testing activity which
24   identified a number of faults which were addressed. The
25   intensive exercise designed to remove Acceptance

20

Incident 298 resulted in many substantial improvements to the error handling, messaging and printing aspects of this product."

That's the 80 per cent that we talked about just now:

"We finally introduced improved unit and link testing and more disciplined configuration control. Finally, the maintainability and enhanceability of the product has been proven by the speed and quality of the SIP16 and EPOSS reconciliation developments.

"We will of course continue to monitor the PinICL stack for the next few months and if necessary re-evaluate this decision. Would Jan please close this issue formally using the rationale described."

So what you are doing there is asking Jan Holmes to close the recommendation because, in your view, it effectively didn't need to be written at that time?

A. At that stage, I was suggesting that the evidence was showing us that it was stabilising and that the number of problems we were experiencing was reducing and I didn't believe that it justified a rewrite, but it's not my decision alone. That would have been discussed with Mike Coombs and the board in general -- not the board in general, the ICL Pathway management team.

Q. Who would that be?

21

A. That would be Mike Coombs, John Bennett and the other people in the room: Tony Oppenheim, Mike Bennett, all the people in the ICL Pathway management team.

Q. Can we go back to the page itself. So we have the management team members there but you are down as the owner there?

A. I was down as the owner but that's not a decision I could have made alone.

Q. If we keep on scrolling on this particular document there are more tasks there, more recommendations, but you will see that your name is in the management level there rather than the owner, so that's -- I think it's fair to say the key corrective action or recommendation that you were the owner of was that one about the PinICL, the EPOSS system?

A. Yes, without doubt. There were others -- there's one at the bottom of that page which was down to me.

Q. Yes. Can we look at WITN04600104 please. This is the same report but a bit later. It is version 2.0 and it is dated 10 May 2000, so it's six months later. Can we go to page 6 and do precisely what we did on the last document, which was scroll through. You will see there, 3.2, for example, by that stage had been closed. We can scroll to the next page. Those early documentation ones, I think they were all closed.

22

Then it is page 9 where the 4.2.1 appears, and that's what we saw last time, but if we scroll over the page, it has been updated. Thank you very much. Again, I'm going to need your help with a bit of interpreting here, I think. If we could look at the right-hand side of the screen, perhaps we could blow that side up.

8 December:

"JH [that's Jan Holmes] requested statistics on fixes delivered to live from RM."

Who was "RM"? Might that have been Royal Mail, I wasn't sure?

A. No, no. It could be release management.

Q. "Also informed [yourself] that requires agreement of [Mr Coombs] before this can be closed."

A. Absolutely.

Q. So Jan Holmes there is asking for statistics on fixes before he can be satisfied that it should be closed.

A. Yes.

Q. Then we look at 8 December:

"[Mr Coombs] confirmed that unless [maybe release management] statistics contradicted reports provided by PJ ..."

Is that Mr Jeram?

A. Peter Jeram, yes.

Q. "... the recommendation could be closed."

23

Nothing is disclosed in December and nothing is closed in January, February, March and we're in April now, 7 April. There's, again, an email to Mr Coombs, yourself and Mr Jeram:

"... providing details of [release management] EPOSS fixes to live. Asked for confirmation that matched PJ reports. If does then will close."

So was confirmation given before 10 May of the sort that Jan Holmes was requesting?

A. If Mike closed it, then yes.

Q. Well, we will see the basis on which it was closed but it does seem like quite a few months have passed and the kinds of statistics that were being asked for there weren't produced, or there seems to be some sort of issue because we go through, as I say, December, January, February, March, April --

A. No, I don't think it's -- excuse me, it's not -- I don't think it's suggesting that. I think it's suggesting that, through the observation period, while further testing was going on, that the statistics didn't -- demonstrated that the product had stabilised and was no longer producing the kind of problems it was before. So it's a case of saying that -- Mike's saying that "If I can see statistics from release management that support the recommendation, then I will authorise the

24

1   action to be closed".

2 **Q.** It certainly seems as though, throughout early 2000, at

3   least, he wasn't getting those statistics, would you

4   agree with that?

5 **A.** I -- there is an inference of that, but I can't recall

6   that.

7 **Q.** We're going to return though document but perhaps we can

8   just go to FUJ00058190, please. This is the ICL Pathway

9   Monthly Progress Report for February 2000. Is this the

10   kind of document that you would have seen at the time?

11 **A.** I used to write one of the sections of it.

12 **Q.** Can we look at page 5 of that report. Thank you very

13   much. So rollout is on track by that stage:

14   "We have now exceeded 4,000 post offices and are

15   achieving the targeted 300+ implementations per week.

16   This is a tremendous performance ..."

17   So at that point, February 2000, quite rapid

18   acceleration of the rollout.

19   Can we look at page 6, please. There is a heading

20   "New Business":

21   "Now that Acceptance has been achieved and National

22   Rollout and Customer Service are seen by [Post Office]

23   as going well, there are positive engagements now

24   starting on new business."

25   So it seems as though there is movement towards

                   25

1   reordering of the fix backlog, but it will be at least

2   until the first week of March before this situation

3   improves."

4   So, I mean, the impression that you get there is

5   that, despite the rollout going and progressing rapidly,

6   there is some dispute about under-reporting from ICL.

7   Do you remember that, or is that a fair observation in

8   relation to that paragraph?

9 **A.** "CS" is customer service and what we were doing at this

10   stage was it was moving from a development kind of

11   project into a customer service project, so it was

12   a transformation. This is what often happens in IT

13   programmes. Once they have gone through an intensive

14   development phase they have to move into a system

15   support service management kind of environment.

16   To do that, you need a completely different

17   organisational structure and you need different skills

18   and such-like, and Stephen Muchow who was the service

19   manager, this is his report, and it's -- it would appear

20   to be doing -- he is reporting against the helpdesk and

21   the flow from the helpdesk through and how fixes are

22   being identified.

23   I was right at the end of the chain, if you like, so

24   when you get the helpdesk, which was a mixture of

25   experts on both POCL and ICL Pathway, and that's where

                   27

1   focusing on new business, by that stage. Would you

2   agree with that?

3 **A.** That's what it implies, yes.

4 **Q.** Can we look at page 24 of this report, and please do

5   tell me if there's something that you recognise that you

6   wrote -- if this page 24, for example, is something that

7   you wrote, then please do let us know?

8 **A.** No, it's not. My section is the one headed

9   "Development".

10 **Q.** Okay, so this is "Acceptance Loose Ends". Do I take it

11   from that that those are certain things that haven't yet

12   been resolved?

13 **A.** It would appear that way, yes.

14 **Q.** Can I read to you that second bullet point. It says:

15   "We have dealt with queries from POCL concerning

16   AI376."

17   That was the lack of data integrity AI:

18   "One formal letter has been responded to attempting

19   to avoid the conclusion that we had not found EPOSS

20   reconciliation incidents that we should have found or

21   that we have not reported those we did find. In reality

22   CS are greatly hampered in 'spotting the incident'

23   because the reports have not had fixes implemented and

24   report large amounts of do-nothing information. We have

25   attended the Release Management Forum and proposed some

                   26

1   some of my team ended up moving towards second line and

2   third line within that, and we would also work on the

3   helpdesk occasionally, so they were no longer reporting

4   into me, they had moved across into a service management

5   environment. So what this is doing, it seems to be

6   suggesting that Stephen at that point is not happy with

7   that process.

8 **Q.** But does it seem that in early 2000 there were some

9   allegations from the Post Office that ICL Pathway

10   weren't reporting as many incidents as perhaps they

11   should have?

12 **A.** I don't believe that to be true. We reported

13   everything.

14 **Q.** But do you remember an allegation of that sort?

15 **A.** No, I don't, actually.

16 **Q.** "CS [customer service] are greatly hampered in 'spotting

17   the incident' ..."

18   I mean, were there issues in early 2000 with really

19   spotting incidents amongst your team?

20 **A.** Well, that's written in a way -- it says customer

21   services "are greatly hampered in 'spotting the

22   incident'", and I don't understand that statement.

23   I genuinely don't understand it. I can only guess and

24   speculate that it is to do with -- well, it's saying

25   "spotting the incident". The incident would be reported

                   28

1 to the helpdesk, so I think it could be saying that the
2 team that was in place at the time were struggling to
3 identify where the problem is.
4 Q. Can we go back to WITN04600104 and to page 10, please.
5 Thank you very much. Sorry, could we go to one page
6 before that -- and over the page. Sorry, other way.
7 Perfect, thank you very much.
8 So I put to you earlier about late 1999/early 2000
9 is seems as though -- the inference, as you agree, from
10 that document is that there's some sort of problem in
11 producing the statistics that have been asked for by Jan
12 Holmes and, set against what I have just shown you,
13 I mean, would you accept that it looks as though there's
14 some sort of issue going on in early 2000 about
15 providing accurate information about the number of
16 incidents?
17 A. Yes, they should -- there was, there was. It would
18 definitely imply that there was an issue there. I can't
19 recall what the issue was, no I can't.
20 Q. Then there was a reminder on 3 May and then 10 May you
21 have this, and this is a response received from
22 Mr Coombs:
23 "As discussed this should be closed. Effectively as
24 a management team we have accepted the ongoing cost of
25 maintenance rather than the cost of a rewrite. Rewrites
29

1 of the product will only be considered if we need to
2 reopen the code to introduce significant changes in
3 functionality. We will continue to monitor the code
4 quality (based on product defects) as we progress
5 through the final passes of testing and the introduction
6 of the modified ..."
7 Is it C14 or CI4? It's a fix of some sort?
8 A. It's a release of some kind, yes.
9 Q. Yes. Let's say CI4:
10 "... codeset into live usage in the network. PJ can
11 we make sure this is specifically covered in our reviews
12 of the B&TC test cycles."
13 Then it is closed on the 10th. So it says
14 "Effectively as a management team" you have decided --
15 who was the management team?
16 A. Well, the management team was the people in ICL Pathway.
17 That would be people like Peter Jeram, myself, Mike
18 Coombs and Stephen Muchow and various other people.
19 Q. Now, by referencing the management team there, by the
20 sound of it the decision of management might have been
21 taken contrary to those lower down the chain. Would you
22 accept that? Were there, for example, people within the
23 team who were really saying at that stage "We really
24 need to rewrite this product"?
25 A. There could be some programmers, yes. Yes, there was --
30

1 there was a difference of opinion, without doubt.
2 Q. That was a different of opinion between management and
3 those --
4 A. No, there was a difference of opinion within the
5 technicians, so the problem I had as a manager is I was
6 getting contradictory information. I was getting a view
7 that was -- from the PinICL viewpoint I could see the
8 product was unstable and when I'm trying to identify
9 what the issue is and what we're going to do about it
10 and talking to the various people, there was two
11 different views: there was those in the team that felt
12 it should be rewritten and those in the team that felt
13 that we should focus our efforts in certain aspects of
14 the products.
15 Q. Do you think those who felt it should be rewritten were
16 in the majority?
17 A. I don't know, but they were just equal on the people
18 I spoke to.
19 Q. I mean, the reference there to management team suggests
20 at least that it was management who thought it shouldn't
21 be, but perhaps those below thought it should be?
22 A. As I said originally, there would have been people,
23 programmers, who may have felt that it was the right
24 thing to do.
25 Q. Can we look at your witness statement, that's
31

1 WITN04190100. Side by side if we can, but if we can't
2 that's not a problem. It is page 12 of your witness
3 statement, paragraph 26. Thank you. So it's about
4 halfway down that paragraph you say:
5 "The option was debated at length by senior members
6 of the ICL Pathway management and technical teams and
7 the outcome was that we should embark upon a major
8 exercise to target the specific areas known to be the
9 source of most (circa 80%) of the issues identified
10 which were error handling and printing. If this
11 approach was unsuccessful, then a rewrite would be the
12 only option available. However, the product did become
13 stable and the number of outstanding defects did fall
14 within the levels defined in the acceptance criteria."
15 It may be suggested that that is slightly
16 inconsistent with what's being communicated by
17 Mr Coombs. I will run you through where those
18 inconsistencies may or may not lie.
19 You have said in your statement, for example, it was
20 debated by members of management and technical teams
21 and, as I say, Mr Coombs seems to focus on the
22 management team. Again, do you think it is possible
23 there that it was the technical teams who were in favour
24 of the rewrite and management who weren't?
25 A. No, no. The technical teams means the people in my
32

1 development and design -- architectural design and
2 development, who I had the most confidence in and we
3 would thrash, looking at the facts and decide what was
4 the best option forward. So they were the -- comprised
5 of people like Alan Ward who was my chief architect.
6 They would comprise of people like John Hunt who was one
7 of the consultants on the team. Steve Warwick who was
8 the expert in EPOSS and Pete Jeram who was the
9 development manager at the time. So that's what I mean
10 by the "technical team" is that we would have pulled in
11 people that we had confidence in and we would thrash out
12 what we thought was the best way forward.
13 Q. Amongst those names that you have mentioned, were they
14   all in favour of a rewrite?
15 A. No, none of them were.
16 Q. Your explanation in the witness statement seems to focus
17   on what we know as AI298, that's the overall stability
18   Acceptance Incident. Would you accept that there were
19   other issues, such as cash account imbalances, whether
20   caused by what we know as AI376 or something else at
21   that time, which were still occurring and still related
22   to the EPOSS product?
23 A. That's right. What I'm implying in my witness statement
24   is that, if you like, we were judged on acceptance and
25   acceptance was whether the product, the overall product

33

1 met the business requirements as stated in the
2 functional specifications, the business requirements
3 specifications, and whether it met the criteria for the
4 number of defects and errors that were still available
5 in the product.
6   If we achieved that, which was -- if I recall was
7 zero As and ten Bs or -- and no restriction on Cs at
8 that point, then from that perspective we have met the
9 criteria on two fronts.
10   Now, if the decision we had made was -- wasn't the
11 right one, then it would have shown up in that and we
12 would have failed acceptance, so that's what I'm
13 implying in my witness statement, is that we wouldn't
14 have achieved acceptance.
15 Q. So would you accept -- and I think others such as Tony
16   Oppenheim have said this -- that there would still be
17   some circumstances where it wouldn't be possible to
18   identify what has gone wrong?
19 A. One of the biggest difficulties with the instability
20   issues was, in the 1990s, that you -- some of you,
21   forgive me, may recall in the '90s if you had a PC that
22   actually it was very subjected to blue screens and lock
23   ups.
24   I mean, nowadays you never see a blue screen, but
25   Windows NT in the '90s, you would get a blue screen and

34

1 trying to track down what had caused that in such
2 a complex system as Pathway was extremely difficult
3 because a lot of the blue screens we were experiencing
4 were at the counter, frustrating the postmasters
5 considerably, understandably, but trying to understand
6 what was happening at the time -- because the blue
7 screen would then -- you would reboot it and it would go
8 away and, as most of you know now, even a common
9 solution to a printer or a PC or a laptop is just to
10 switch it off and switch it back on again, but when
11 you're in a distribution system, switching it off and
12 switching it back on again, which is a reboot, we want
13 to find out what the problem is.
14   We have no way of seeing the counter. We can't get
15 onto the counter to have a look at it and we can't take
16 what we used to call "dumps" or "print-outs" of the
17 store, the message store to try and see what caused that
18 issue.
19   So that was a constant thorn for us to try and -- we
20 would get a lock-up or a freeze and all you could
21 suggest to the people was that "We will try and find" --
22 and we did find quite a few of them and it was down to
23 two or three very, very clever individuals that managed
24 to track down what some of these were and they were
25 quite obscure. So that's what I'm referring to is that

35

1 the stability one was to do mainly with blue screens and
2 freeze -- and lock ups and the AI376 was to do with
3 balancing the cash account.
4 Q. Absolutely, so your focus in that particular passage as
5   well is on AI -- what we know as AI298, that's the
6   overall --
7 A. It's on the stability one, yes.
8 Q. But you clearly accept at that stage there were other
9   issues, especially with the EPOSS product, that were
10   continuing, even if, as you say, it may have been circa
11   80 per cent that was the overall stability issue?
12 A. Yes, but we -- during the period from there onwards we
13   focused on PinICLs. I called -- I introduced a --
14   during the -- when these PinICLs were being raised and
15   the problems on reconciliation and freezes and lock ups
16   were being identified, we had what we called "morning
17   prayers" and every morning at 8.30 am all the top people
18   in my team would meet and we would go through the latest
19   incidents and the ones that we had -- previous
20   incidents, find out what progress we had made on the
21   ones that we had identified previously, and any new ones
22   overnight -- the previous day and then we would decide,
23   during that meeting, the course of action and then we
24   would meet the next day. We did that day after day
25   after day for many weeks.

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1 Q. Absolutely. I mean we're here in -- this is May 2000
2   so --
3 A. This is closing down something in May 2000. It's not --
4   and it's as a result of what's been going on and what
5   Michael is saying there is that there was no evidence to
6   suggest that it shouldn't be closed.
7 Q. Your evidence is that, after closure, there were still
8   a number of incidents still continuing and you had
9   dedicated --
10 A. No, no, no, that was before that.
11 Q. So after May 2000 there weren't incidents?
12 A. No, there would still be incidents, there's always
13   incidents in a system of that size but they were being
14   monitored through the helpdesk and down through the
15   support channels.
16 Q. But by May 2000 your focus had been on AI298 in
17   particular?
18 A. And -- well, 376 as well.
19 Q. But 376 you would accept continued?
20 A. We were looking at all issues identified by -- coming
21   down through all PinICLs, all incidents that had been
22   raised on the EPOSS product at that point and we were
23   focusing on every one of them. So we didn't leave these
24   to one side, or -- every one that appeared like it
25   looked like it was EPOSS -- and quite often it wasn't
                              37

1   EPOSS, it was either to do with the TIP interface or it
2   was to do with the processes or it was to do with
3   reference data, or it was to do with migration or some
4   kind. Just because it was identified, that was where
5   the source of the problem existed, that didn't
6   necessarily -- that's where the source of the fix
7   existed.
8   So I would bring everybody into my office and every
9   morning, witnessed by senior Fujitsu test and diagnostic
10   experts that came over from Japan and were allocated by
11   Fujitsu who sat in my meetings to watch me and decide
12   whether they were happy with the process. So I was
13   under a lot of scrutiny there and I personally wanted to
14   see and get this sorted out. It mattered an awful lot
15   to me to get it sorted out.
16 Q. So are you saying that throughout the year 2000 it was
17   well-known in Fujitsu, including people who came over
18   from Japan, that there were --
19 A. We've got a timescale problem here. May 2000 is at the
20   end of that period not the beginning. I'm talking about
21   the period prior to that when we were doing model office
22   testing, end to end testing, acceptance testing and live
23   trial.
24 Q. So by May 2000 it all suddenly stopped?
25 A. No, it -- EPOSS was not providing the kind of problems
                              38

1   that would justify rewriting the code. That's what
2   Mike's saying.
3 Q. So it wasn't providing sufficient problems to justify
4   rewriting the code?
5 A. Correct.
6 Q. But it was still providing problems?
7 A. As were other parts of the system, yes.
8 Q. But you would accept that the EPOSS was still an issue
9   post May 2000?
10 A. Well, it depends what you mean by an issue. There were
11   problems, defects which were being dealt with in the
12   normal support way.
13 Q. I mean given all the information that you received over
14   those two years, so starting from that Holmes/McDonnell
15   report in 1998 and then the report in 1999 and the
16   issues in early 2000, didn't you think that it might
17   have been the time to start thinking about rewriting
18   EPOSS?
19 A. I did, I did, several times think about it and I was
20   persuaded by the technicians working on the product that
21   they felt they could sort it out.
22 Q. Were there any particular technicians who you felt
23   persuaded you?
24 A. Steve Warwick, in particular, because he knew the
25   product better than anybody else.
                              39

1   Q. Let's look at FUJ00079333, please. Now this -- the top
2   email, the top two emails, are emails of 10 May 2000 in
3   the evening, 6.36 pm, 6.28 pm in the evening of 10 May,
4   so it looks, certainly from this -- from the time, that
5   that was after the issue had been closed; would you
6   agree with that? Do you remember was there a meeting in
7   the daytime, or discussions in the daytime, on the 10th
8   to close the recommendation?
9   A. I can't recall, but it -- this seems to be after that,
10   yes.
11   Q. Now, let's look at that second email on the screen, so
12   this is an email from you. In fact can we go over the
13   page. We will start with the original request, so this
14   is actually before the closure, so this starts in April,
15   27 April. Do you remember who Pat Lywood was at all?
16   A. No.
17   Q. So these are current issues --
18   A. Oh, I think Pat Lywood was someone that went -- that was
19   in the customer services support line.
20   Q. It says "Current issues on", and that's I think either
21   C14 or CI4 EPOSS, and can we look -- halfway down the
22   screen we can see there "Balancing process overheads":
23   "After migration to CI4 a new process is introduced
24   to the cash account process. Every office will be
25   required to declare non-value stock. If the office
                              40

1   fails to do this process he will not be able to balance
2   or complete the cash account."
3   Then it says that:
4   "Paul Westfield and I will ensure this is included
5   in the backfill training provided to the existing
6   offices."
7   Then further down there's reference to "Risk of code
8   regression", that's another heading:
9   "There may be fixes that have been produced and
10 delivered into CI3 that have been missed from CI4.
11   "I will take this up with Dave Royle and ask for
12 assurance that all clone PinICLs have been tested.
13 I will supply a list of the PinICLs that we have tested
14 in CI3R release."
15   So that's the start of the chain and, if we go to
16 page 1, Stephen -- is it Muchow or?
17 A. Muchow.
18 Q. At the bottom of the page, sorry. He sends you
19 an email, again on 27 April, so before the closure of
20 the EPOSS issue, and he says:
21   "I am particularly concerned with the risks of
22 degraded counter and cash account performance and of
23 code regression between CI3 and CI4."
24   Then you respond in the email above that -- and one
25 thing that may become relevant in due course, Gareth
                        41

1   Jenkins is copied into that email -- and you say at 6.36
2   on 10 May, so presumably after the recommendation has
3   been closed:
4   "Steve, I share your concerns regarding counter
5   performance and code regression. To that end we are
6   focusing on those areas of functionality where we appear
7   to be experiencing performance degradation and
8   attempting to establish where the problem lies. I have
9   been personally aware of these problems for several
10 weeks and would not expect CS to authorise CI4 unless
11 these issues were resolved. I have raised the issue of
12 extra work during weekly balancing with Mike who will be
13 discussing it with Dave Smith. This has been introduced
14 by POCL to support LFS.
15   "I cannot give you a 100% guarantee that code
16 regression will not occur at CI4 because, by its very
17 nature, it is not fully automated and never will be.
18 However, our end to end processes are designed to reduce
19 the possibility of this occurring to an absolute minimum
20 and I have recently requested a reconciliation where it
21 is possible to do so."
22   So you have said there that there's a problem that
23 you have been aware of for several weeks and you cannot
24 give 100 per cent guarantee that code regression won't
25 occur, keep it to a minimum. Code regression, that's
                        42

1   similar to code decay, is it, but it means, I think,
2   that by fixing one thing, it could break something else
3   that was working before?
4   A. Yes. It's not decay, no. Code regression -- we used to
5   have a testing sequence called regression testing and
6   whenever you put a fix into a product of any kind you
7   will subject it to regression testing to see that you
8   haven't undermined or introduced another problem, or
9   affected something you had already done, hence the
10 reason it is called "regression testing", to ensure that
11 you have not regressed the problem.
12   So the problem is that, when you're fixing faults,
13 you cannot guarantee that you haven't caused
14 a regression because it's technically -- if a programmer
15 puts the fix in, he does it, he tests it to his ability,
16 it then goes into regression testing and regression
17 testing says it's okay. It then goes into the live
18 environment and because you have assembled far more of
19 the system at that point, there's so many more moving
20 parts, then you may -- another error may crop up. So
21 some regression may -- that may well happen and that
22 will be -- that is the case with every IT system I'm
23 aware of.
24 Q. Is it a bit like Whack A Mole, where one problem comes
25 up, you try and fix it and then something else pops up
                        43

1   somewhere else?
2   A. You may have inadvertently -- by fixing the problem you
3   may have re-introduced something else or you may have
4   knocked on to some other part of the programme that the
5   programmer didn't release.
6   Q. As I say, the evening that that recommendation about
7   EPOSS was closed, I mean, there may be some people
8   asking how could you close that recommendation knowing
9   all that is contained within that email?
10 A. This is to do with performance. This is to do with
11 performance degradation. This is not to do with EPOSS
12 degradation. It's another issue. What's happening is
13 that we're noticing that the time it's taking on -- the
14 counter performance on its response times and the time
15 it's taking to do the cash account is degrading and that
16 is a performance issue. What -- we don't know and we're
17 trying to find out what's causing that, so that's why
18 I was aware of it, is because I had been aware that it
19 was happening but we were finding it extremely difficult
20 to reproduce it in the laboratories.
21 Q. But if we look at the subject, it's -- C14 was
22 a particular fix on EPOSS, so it was a problem that was
23 fundamentally on EPOSS?
24 A. It was on EPOSS but it was a performance element. What
25 it says is regarding counter performance and code
                        44

1   regression so was there something happening where the
2   code was regressing which was causing the performance to
3   get worse? So that's the question that I couldn't
4   guarantee and what Steve is asking the question.
5 Q. Presumably, those issues could have real life
6   implications for those who were trying to balance, for
7   example?
8 A. Yes, yes. I mean, I was very concerned that we -- it
9   was taking longer to do the account balancing at the end
10   of the day than it should.
11 Q. But do you think that these kinds of issues should have
12   been raised with Jan Holmes before closing that incident
13   on that day?
14 A. We didn't have -- we didn't have any PinICLs. It was
15   something that I was aware of that what appeared to be
16   happening -- there was no proof, there was no evidence.
17   All that we were getting was a feeling that the counter
18   seemed to be degrading in performance while we were
19   going through this work, and this is -- Steve's making
20   the same point, so it -- I get where you're coming from,
21   but we would have seen these as two different issues.
22   In hindsight, maybe -- I can accept the point you're
23   making is that maybe the fact that these were starting
24   to occur, we should have perhaps raised them during
25   that, but we weren't -- at the time that Jan wrote the
                          45

1   it was to do with counter performance and potential code
2   regression, but that's not necessarily just EPOSS.
3 Q. One of your solutions to the EPOSS problem though was to
4   implement fixes along the way, rather than rewriting, so
5   presumably every fix, there's potential for code
6   regression?
7 A. Yes, see, I know that we found out what was causing this
8   and it wasn't EPOSS. So that's the point I'm trying to
9   make is there's several elements -- if -- you may have
10   already seen, if you have seen a technical environment
11   description of the system, there are several elements
12   that sit within the counter and one of the issues in the
13   '90s was trying to get any system to boot up with all
14   the mass of software that had to initialise in there,
15   and things like the counter slowing down could have
16   been -- as I said, it could have been to do with any
17   product within the counter that was causing that, not
18   necessarily EPOSS, and we did resolve this problem. As
19   far as I can remember, we did resolve the problem.
20 Q. I want to take you to a PinICL. It will only take 10 to
21   15 minutes. Would you like to break now or can we break
22   after I have taken you to that, because that's the end
23   of my questioning on EPOSS issues?
24 A. No, we can carry on.
25 Q. Thank you very much. Can we look at FUJ00067416,
                          47

1   original report and the time that Mike -- we had no
2   evidence that it was -- I'm not being very clear here.
3   What I'm trying to say is we couldn't -- we didn't
4   know what was causing the problem and we didn't know
5   what extent the problem was either.
6 Q. Do you think that might have been something to tell Jan
7   Holmes?
8 A. (Pause) The reason I'm hesitating is I think you're
9   probably right. In hindsight, you're probably right,
10   but counter performance and the time it was taking to do
11   something we used to look at in a different way. We
12   didn't -- it could have been for a variety of reasons.
13   It may not have been anything to do with the EPOSS
14   product. It may have been to do with the way that the
15   counter was booting in the morning. It could have been
16   all sorts of things that may have been causing that to
17   happen, so it wouldn't -- it wouldn't necessarily be
18   pointing at EPOSS.
19 Q. But you're talking there of code regression as well as
20   counter performance so --
21 A. Yes, but that could be code regression anywhere in the
22   counter. He is talking -- he is saying EPOSS -- and
23   Steve wasn't a technical guy, so what -- it's
24   terminology being used there. I have responded in
25   saying -- because I know what he is referring to -- that
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1   please. It's a PEAK rather than a PinICL. For those
2   who have been following this Inquiry, this also appears
3   within the expert report at page 157.
4   Now, I'm going to need your help quite a lot with
5   this because it's not very easy to understand, but can
6   we look at 16 May, so the first entry. This is six days
7   after that EPOSS issue was closed. It says:
8   "The host generated cash account line comparisons
9   report dated [15 May] where post office 169207 has
10   a difference in the receipts and payments total for cap
11   [that's cash accounting period] 06. Please
12   investigate."
13   Now, the third entry there, can we just scroll down
14   slightly, so it's 19 May -- actually it's the fifth
15   entry, sorry:
16   "This office has had big problems with its receipts
17   and payments. [Cash account periods] 5, 6 and 7 did not
18   match. The differences are ..."
19   It gives the difference:
20   "The office has already reported problems balancing
21   which are being investigated by development ..."
22   So big problems being identified and I think if you
23   look at two entries down there's another report on
24   19 May, receipts and payments issue in CAP7.
25   Can we go to 24 May, that's over the page, page 2.
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1 You so it says there:
2   "The cause of the problems in all three [Cash
3 Accounting Periods] at this outlet was the fact that
4 Stock Unit DD's rollover records from CAP5 to CAP6
5 represented a 'nil' balance (the total stock holding was
6 nil, no receipts or payment transactions were recorded)
7 despite the fact that the stock unit had been trading
8 normally during this period. This issue was raised in
9 PinICL 43811 and is still under investigation within the
10 EPOSS development team."
11   Was that your team, the EPOSS development team?
12 **A.** No, not at that stage. As I said to you, it had moved
13 over into a support environment and I wasn't responsible
14 for the team at that point.
15 **Q.** But there was a specific team dealing with problems with
16 EPOSS on 24 May --
17 **A.** Yes.
18 **Q.** -- and they dealt with issues to do with --
19 **A.** Absolutely.
20 **Q.** -- balancing issues.
21 **A.** Absolutely.
22 **Q.** Can we look at the entry on 30 May, that's one entry
23 down. There's more information there about further
24 investigation. I'm not going to read that out. Perhaps
25 if you could just take a short period just to have
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1 a quick look at what it says there.
2   (Pause)
3   Then if we go down to the bottom of the page there's
4 an entry of 4 July. Can we just scroll over to the next
5 page. At the top of the next page seems to be
6 an explanation:
7   "This problem is the same that already resolved in
8 PinICLs 37884 & 37663, namely that of DataServer not
9 tree building & populating correctly. A diagnostic has
10 been put into DataServer to detect any such problems."
11   That's the explanation.
12   Can we look at 12 July. This is where it becomes
13 difficult to understand and I'm going to need your help
14 if you're able to, on page 4, the entries from 12 July.
15 Can I ask you just to read to yourself those entries
16 briefly.
17   (Pause)
18   If you're able -- if we could carry on scrolling
19 perhaps, because there's another entry on 12 July at
20 12.29. Can I ask you to read that final entry.
21   (Pause)
22 **A.** Right, okay.
23 **Q.** Can you help us, it seems as though what they are trying
24 to do is work out how to reproduce the cash account as
25 it should have been prior to an error; is that right?
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1 **A.** That's true, but they also believed that they understand
2 what has caused the problem, which is pretty obscure.
3 **Q.** Yes. Can we have a look at the next page, 8 August,
4 halfway down the page 2.35 in the afternoon on 8 August:
5   "I have spoken to Martin McConnell who advised call
6 to be routed to EPOSS ..."
7   That's, again, that EPOSS team, is it?
8 **A.** I don't know what FP stands for because, at that point,
9 as I said, it's not within my chain.
10 **Q.** Can we go over the page to 13 September, please. There
11 are two entries on the 13th. If that first one could
12 be -- perfect, thank you very much. Again, I'm going to
13 ask you to read those to yourself. I mean, I will read
14 just very briefly the first one. It says:
15   "It proved to be very difficult to resurrect the
16 cash account data for week 5. Steve Warwick's analysis
17 tool showed that not only was stock unit DD corrupt but
18 also stock unit XXX. EPOSS nodes ... were missing and
19 had to be resurrected."
20   If I could ask you just to have a quick look at that
21 and then also the one below that.
22   (Pause)
23 **A.** Yes.
24 **Q.** And the one below, sorry.
25   (Pause)
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1 **A.** Yes.
2 **Q.** Are you able to briefly describe what you think is going
3 on there?
4 **A.** There was -- it would appear that they have come to the
5 conclusion that something had kicked in on archiving
6 from the counter, which caused the problem, and it is
7 that -- as I said before, that's obscure for that to
8 have happened and, as a result of that, it's caused this
9 impact and then it would appear that they are struggling
10 to be able to reproduce the cash accounts and the
11 figures that would balance them off and they're
12 suggesting the way in which they can move forward on it.
13 **Q.** Can we go to the final entry on that page, and it goes
14 over the page, so this is 14 September 2000. I will
15 read this one. This is an entry that says:
16   "Thanks for all the effort. For the time being
17 I have agreed that reconstructed cash accounts will not
18 be needed all the time, but only by special request of
19 POCL.
20   "I have already issued the final BIM report.
21   "As such please close this call, and hope for the
22 best with the CI4 code which should make this type of
23 incident very rare."
24   So, I mean, here we are in September 2000 and the
25 approach is "Let's hope for the best". I mean, is "hope
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1 for the best", is that what you decided to do in terms
2 of the rewrite of --
3 **A.** I was not responsible for this --
4 **Q.** No, but "hope for the best" was that the kind of
5 attitude that was taken in respect of the EPOSS product
6 back in May: hope for the best, hopefully it will be
7 very rare?
8 **A.** No, no. The data that had been received prior to May,
9 which resulted in Mike suggesting that it should be
10 closed, didn't suggest -- it suggested that we had
11 resolved the issue. There were still going to be
12 problems because of the sheer nature and scale and
13 complexity of the project, but the original issue which
14 was to do with error and printer handling and cash
15 account balancing, we believed that in the majority of
16 instances, 99 per cent of the -- we had managed to sort
17 it. That's what Mike was referring to.
18 We knew -- well, we didn't know but, as a result of
19 this, which I had no involvement with whatsoever, but
20 a very obscure incidence of where an archiving programme
21 kicked in, which caused this problem -- it shouldn't do,
22 but it did and it seems to be something to do -- between
23 Riposte and the archiving suite that caused this. And
24 these are the kind of problems you get in large systems
25 and the idea is to try and track it down.

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1 It would appear that what they're saying is this
2 shouldn't happen and it may happen again, but if it does
3 it would be another PinICL. We would have to look
4 straight into it straightaway, if it happened, is what
5 they're saying. "Hope for the best" is it should sort
6 itself out in C14, is what he is suggesting. It's not
7 terminology I would have used but --
8 **Q.** "It should sort itself out" is, in fact, a phrase we
9 have heard quite a lot of, especially during the human
10 impact stages. Was the general feeling that things will
11 sort themselves out?
12 **A.** No, no. Okay, my terminology wasn't very helpful there,
13 but what I'm trying to say is somebody -- I wasn't
14 responsible for C14 or -- I don't know what it was,
15 sorry, so I can't be helpful on that. I don't know what
16 it involved. I don't know what was in there. There may
17 have been a lot of fixes put in there.
18 **Q.** Can we look -- and this is the final thing before the
19 break -- at FUJ00080690. It is the first document that
20 I took you to today. Can we look at page 7, please, and
21 at the top of page 7.
22 So in 1998 you were being told that there were
23 hundreds of fixes, code decay, the system was unstable,
24 no guarantee it won't adversely affect another part of
25 the system. I mean, looking back at that paragraph and

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1 knowing what you know now, do you think you should have
2 agreed to rewrite EPOSS back in 1998 or 1999?
3 **A.** The best advice I was getting at the time was that, if
4 we were to rewrite, did we have the -- did we have the
5 people to do it, did we have the expertise to do it and,
6 by doing so, would we run the risk of just creating
7 another problem because one of the reasons why this got
8 into this situation is that we were forced to do rapid
9 application development and, by doing that, you haven't
10 got a functional specification, you've got what we
11 call -- you're talking to people and you're trying to
12 get EPOSS to sit along -- POCL people to sit alongside
13 you and the problem was that we had people who were
14 working in that environment that weren't very
15 professional and weren't very good at their job.
16 So I was convinced by the people that were giving me
17 the evidence that it was a certain part of the EPOSS
18 product that was responsible for a very large
19 per cent -- we say 80 per cent but it could have been
20 90 per cent. I was measuring whether that was a good
21 decision by the number and type of PinICLs that we were
22 getting, come the live trial, and that's how I measured,
23 personally, whether that was the right decision to do.
24 If the product had been as bad and Steve, for
25 example, and others had been wrong, then we would never

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1 have got to that stage. We would never have got to the
2 acceptance situation and number of PinICLs. We would
3 have had a product that we would have had to have
4 rewritten.
5 **Q.** Do you think that you listened enough to the members of
6 the team who were urging a rewrite?
7 **A.** The reason I'm hesitating is that I believed I did.
8 I believed -- to their argument. I listened to their
9 argument and so did some of the people who were more
10 technical than I was. I believed that everybody was
11 given an opportunity to give their view of what should
12 happen. They believed that we should rewrite it and
13 there were other people that thought that we shouldn't.
14 **Q.** Once you had taken the decision not to rewrite, did you
15 sideline those who were urging a rewrite?
16 **A.** Not as far as I'm aware. No, not -- I don't believe so.
17 **Q.** By May 2000, so that was the date when the
18 recommendation was finally closed, presumably that was
19 far too late then to start thinking about a rewrite,
20 given the number of Post Offices that already had the
21 system in place?
22 **A.** No, it wasn't too late. I mean, you could rewrite
23 a product over a period of time to match the user
24 interface that the postmasters were used to. You could
25 replicate that functionality in parallel and then

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1   release it at a later date if you felt that was the
2   right thing to do.
3   Q. At no point did you feel that that was the right thing
4   to do?
5   A. Not during my time. I didn't have -- I'd have
6   sufficient evidence to suggest that that was the right
7   thing to do. The ones that you pointed out that were
8   picked up later were very obscure situations. There was
9   nothing there to suggest it was a rewrite.
10 MR BLAKE: Thank you.
11   Sir, I think that's an appropriate time for
12   a ten-minute break.
13 SIR WYN WILLIAMS: Yes, fine. What time shall we resume?
14 MR BLAKE: I think we can actually -- we can come back at
15   midday.
16 SIR WYN WILLIAMS: Midday, all right. Have a break,
17   Mr Austin, and don't talk about your evidence, although
18   I'm sure you won't think of it at any rate.
19 A. Thank you.
20 (11.40 am)
21   (Short Break)
22 (12.00 pm)
23 MR BLAKE: Sir, we can see you now.
24 SIR WYN WILLIAMS: Good.
25 MR BLAKE: Mr Austin, I only have about 15 more minutes and
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1   then I'm going to hand over to Mr Stein and Mr Henry to
2   ask you a few further questions.
3   Briefly, while we're on EPOSS, I want to ask you
4   about RAD, rapid application development.
5   We know from a report that was sent to the Post
6   Office by project mentors -- the reference there is
7   POL00038829 but we don't need to bring the document
8   up -- that Pathway started with rapid application
9   development methodology, but that appears to have been
10   discontinued after a staff member left the project. Do
11   you know anything about that at all?
12 A. Yes. Yes. It was not proving to be very successful.
13   Not only was -- one of the staff members left but also
14   it did depend -- it was very dependent -- had dependence
15   on POCL providing experts that to define their
16   requirement, so -- and that was very time-consuming for
17   POCL and POCL didn't feel that they had enough people to
18   fulfil that role. So we decided to reverse engineer and
19   produce a document that then could be used to use
20   a traditional waterfall approach.
21 Q. So I was going to ask, an advantage of RAD is that it
22   can get something working as quickly as possible, but it
23   relies on later iterating and replacing --
24 A. Absolutely, and that -- it was also obvious that POCL,
25   as a customer, were not comfortable with that because it
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1   meant that it wouldn't be fully functional. So you
2   would be putting out a series of releases over a period
3   of time and they wanted a fully functional system and
4   RAD was not the right way to do that.
5   Q. I think the basic prototype framework in an RAD isn't
6   used, ultimately, in the main build of the system; is
7   that right?
8   A. Well, nowadays it is, but I can't recall -- because RAD,
9   at that time, was quite an immature methodology, I was
10   uncomfortable with it as an individual, as a development
11   person, but I felt that it was still immature and
12   I didn't really understand how you got from A to B and
13   how you got a system that represented what the user
14   wanted.
15   I understood the mechanics but I didn't understand
16   how you achieved a product that would deliver to the
17   customers what they wanted.
18 Q. Am I right to infer from some of your earlier evidence
19   that you didn't have some faith in some of the technical
20   members of the team?
21 A. That's how it -- when I saw -- after requesting the task
22   force, I was extremely disappointed and upset that we
23   had ended up with a product which, on the face of it,
24   looked like it was pretty bad. So yes, that -- I was
25   then put into a very, very difficult position because,
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1   going back to what we said earlier, it's easy to say
2   "rewrite the product", that's the easy option because
3   you can just stand back and say "rewrite it". That
4   doesn't necessarily mean you're going to end up with
5   something that's better, it just means that you have
6   said that's the right thing to do.
7   Actually trying to get a product and fix it and make
8   sure that it's stable -- and I genuinely believed that
9   we had done that, and so I think that I was comfortable
10   that the fact that we had taken that approach and we
11   succeeded in getting the product -- it had been a very
12   rocky ride, but we had achieved that objective,
13   I believed, genuinely, at the time.
14 Q. So what had happened to that original RAD product?
15 A. Well, that RAD product was then enhanced. It was quite
16   some way off what the functional requirement was needed
17   to be, so we took it on from that viewpoint onwards and
18   used it internally within the team.
19 Q. Did you have a final signed off design?
20 A. Yes, in the end, yes. We had to, as I said, reverse
21   engineer and we had to get some business requirements
22   that were signed off by POCL, and a design that was
23   signed off by POCL.
24 Q. I want to ask you about Post Office's awareness of
25   various issues. You have said at paragraph 32 of your
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1   witness statement that POCL were made aware of every
2   defect in the ICL Pathway's solution?
3 **A.** As far as I was aware, they were.
4 **Q.** When you say "defect", do you mean Acceptance Incident
5   or do you mean more than that?
6 **A.** No, I mean more than that. Every PinICL that we were
7   going through that we had received, my understanding
8   was -- and I have no reason to think otherwise -- is
9   that we went through every one with POCL
10   representatives.
11 **Q.** So every PinICL was --
12 **A.** Except for the Cs, a lot of the Cs, but even some of
13   those we went through as well, because every one the
14   category had to be agreed.
15 **Q.** The PinICLs or the Acceptance issues? I mean, PinICLs
16   are --
17 **A.** PinICLs --
18 **Q.** -- every incident --
19 **A.** Yes, if it's agreed that it's an error, then the
20   category of that error needs to be agreed with POCL.
21 **Q.** I mean, the kind of document that we saw, the PEAK, was
22   your impression that those were being seen by POCL?
23 **A.** Well, they were POCL people that were represented within
24   the helpdesk, is my understanding.
25 **Q.** So it was through the helpdesk that you understood POCL

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1 **Q.** What about the other way round? You have said that
2   Pathway wasn't aware of POCL's own systems?
3 **A.** No, not at all.
4 **Q.** Did that cause you difficulty?
5 **A.** I wouldn't say it caused me difficulty. It was a bit
6   like that -- if we had a problem with the TIP interface,
7   we -- we didn't know whether there were any issues with
8   TIP that was causing that. We could see -- when it was
9   our side, we could see what it was saying and we would
10   have to investigate and, quite often, we would find it
11   was an error with TIP. The same would apply to CAP in
12   the Benefits Agency, that we could see through the
13   interface that there was an issue. We didn't know what
14   the issue was, we just see we're having problems with
15   the interface.
16 **Q.** I mean, you were designing an end-to-end product so,
17   presumably, that was pretty crucial?
18 **A.** Agreed.
19 **Q.** Where did that failure lie then?
20 **A.** With the customers.
21 **Q.** Did you ask?
22 **A.** Many times.
23 **Q.** And what was their response?
24 **A.** They didn't feel that it was appropriate.
25 **Q.** Let's look at the invitation to tender. Your role in

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1   obtained their information on problems with the system?
2 **A.** Well, yes, being raised by the postmasters and any
3   incident -- and by POCL. Any incident raised by POCL,
4   whether it be the postmasters or the managers elsewhere
5   within POCL, would come and be raised as a PinICL
6   through the helpdesk.
7 **Q.** Was there some sort of policy in place between POCL and
8   ICL Pathway as to what level of information should be
9   formally shared or informally shared?
10 **A.** I'm not sure.
11 **Q.** Did you have any concerns about the sharing of
12   information with POCL?
13 **A.** In the early days, yes, because it was a PFI and,
14   therefore, we had our solution and, therefore, we were
15   there to deliver the solution in line with our -- the
16   requirements, so we wouldn't necessarily share that
17   information at that point.
18 **Q.** I will ask you about that stage shortly but, in terms of
19   when it was all up and running, it was your belief that
20   POCL had the level of detail that was contained in, for
21   example, the PinICLs?
22 **A.** Yes, yes. That was my understanding, yes. I had no
23   worries about them seeing the breakdown of the helpdesk
24   and the comments, and I believed that POCL were involved
25   in that process.

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1   the procurement process, I think you have said in your
2   statement, was to evaluate the system's requirements in
3   the invitation to tender to determine the resources that
4   were required; is that right?
5 **A.** That's correct.
6 **Q.** Part of that was presumably working out how that
7   end-to-end system could be achieved?
8 **A.** Yes. So I would have to look at the business
9   requirements, as defined in the ITT, and, again, it was
10   a PFI, so we had already developed a solution and were
11   the process of developing the solution to meet those
12   business requirements, and so my task was to make sure
13   that the product that we had was -- the solution that
14   Pathway had would be delivered within that time. That
15   was what my job was.
16 **Q.** We have seen -- I will give the reference but we don't
17   need to bring it up on screen, it is POL00031117 --
18   Keith Todd produced a position paper in 1998, which said
19   that POCL couldn't reasonably have believed that the
20   Post Office's premises were fit for automation. Was
21   that your view?
22 **A.** Yes. It wasn't just my view, but it was a view that
23   I shared.
24 **Q.** Wasn't it part of your job at that stage, that
25   invitation to tender stage, to check things like that?

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1 A. Well, that's how we found out, is by going in and
2 then -- with the implementation to go into the post
3 offices and do the surveys and it was as a result of
4 doing the surveys that we found that out.
5 Q. Wouldn't it have been obvious from quite an early stage
6 in the 1990s that many Post Office branches wouldn't
7 have had even computers?
8 A. No, it wasn't that, it was to do with things like power
9 points, it was to do with desks that were suitable, it
10 was to do with all the aspects of -- as far as the
11 surveys, the surveys were showing that a lot of the
12 premises were not fit to be able to automate in the
13 state they were in and required quite a lot of work in
14 order to make them such.
15 Q. So some blame has been placed on the Post Office for
16 that but it sounds as though you, ICL, were, in fact,
17 carrying out your own investigations as to the state of
18 fitness of the post offices?
19 A. Well, we had to do surveys, that was part of -- because
20 if there was any additional work to be done in the post
21 office, we were obliged to do it, so we went in to
22 survey and then we commissioned the work that was
23 necessary.
24 Q. Was that before the agreements had been signed with the
25 Post Office?

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1 A. No, that was after.
2 Q. So wouldn't it have made sense to do them before?
3 A. We weren't allowed to.
4 Q. Were you involved in preparing readiness before the
5 contracts were signed and establishing what requirements
6 might be required?
7 A. We were -- we had no reason to suspect that where the
8 ITT wanted the system developed would be capable of
9 accepting that. We didn't find out until after the
10 award of contract when we started to commit resources to
11 the surveys and then the surveys were showing that quite
12 a few of the premises needed a lot of work doing to
13 them.
14 Q. Were surveys really -- I mean, couldn't you have looked
15 at some post offices yourselves before signing the
16 contract?
17 A. Well, we did, but there were 19,500 of them, so you
18 could only do a snapshot, if you were allowed to do so.
19 Q. And did you do a snapshot?
20 A. We didn't, no. As far as I know, we didn't, but I can't
21 recall.
22 Q. Why not?
23 A. I'm pretty sure we weren't allowed to.
24 Q. Could they have prevented you from going into post
25 offices?

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1 A. No, they couldn't have done but they wouldn't have been
2 very happy if we had gone there. We would have had to
3 have sought permission from POCL to do that.
4 Q. Keith Todd said that there would have been a view taken
5 of the suitability of the post offices and he referred
6 repeatedly to a full-time team that ICL had. Were you
7 part of that team?
8 A. Well, the implementation, yes -- the implementation team
9 would have been the team that was looking at that, yes.
10 Q. Who was head of that team?
11 A. I can't recall his name because they changed two or
12 three times.
13 Q. At that stage, were you a senior member of that team?
14 A. I was the Programme Manager, of which that team was
15 part.
16 Q. Did you give thought at that stage to the fact that many
17 post offices would use a telephone line connection?
18 A. Yes, we -- that wasn't -- if that was the case, we knew
19 that wouldn't work. We had to find alternative
20 solutions to that.
21 Q. So did you foresee issues with ordinary phone lines
22 being used, such as interference, et cetera?
23 A. Absolutely.
24 Q. Did you raise those --
25 A. Yes, we did, yes. We had to come up with different

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1 solutions for those post offices where that was the
2 case.
3 Q. Can you tell us a little bit just what you recall of
4 consideration being given to those kinds of issues at
5 an early stage?
6 A. Well, we had to come up with a satellite option. We had
7 to come up with a different -- we had to get ISDN lines
8 into those post offices and we were given the impression
9 by BT that we could get ISDN lines into any of the
10 locations we needed to. It was only much later on that
11 we found that BT were struggling to do that.
12 Q. Were you concerned about those that didn't have ISDN
13 lines?
14 A. Absolutely, yes, and we had to find a way of trying to
15 automate them.
16 Q. Because what kind of problems would it cause if they
17 weren't?
18 A. Well, the connection wouldn't be a good one. It would
19 be -- it just wasn't suitable for a distributed IT
20 system.
21 Q. Peter Copping told us that ICL had told PA Consulting
22 that they had seriously underestimated the amount of
23 work that was involved. Would you agree with that?
24 A. Yes.
25 Q. Some witnesses have said that training was also

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1   underestimated by ICL. Is that something you would
2   agree with?
3 **A.** I would.
4 **Q.** Again, I mean, training was something that presumably
5   you were considering at that invitation to tender stage?
6 **A.** Yes, it was.
7 **Q.** What steps did you take at the invitation to tender and
8   procurement stage to consider the level of training that
9   was required?
10 **A.** Well, we put forward our training. One of the issues
11   that we had with training was that -- and it remained
12   a problem -- personal problem, even though I wasn't
13   responsible for it in the latter part of the programme,
14   but I couldn't -- I couldn't see how you could roll out
15   a system at the pace that we were rolling it out and
16   also train people that had such a wide-ranging
17   capability and I could appreciate that some of the
18   postmasters and postmistresses would be horrified by the
19   implementation of an IT system, especially that one day
20   you're manual and the next day you're fully automated.
21   And I know that we looked at training these people
22   for a long period of time to give them as much
23   information as we could, but the issue was that, by the
24   time they were scheduled to be rolled out, they may have
25   forgotten it, which is quite reasonable. So we had to
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1   bring the training so that it got very close to their
2   implementation, within a week or two, as my
3   understanding because I wasn't really into it --
4   responsible for it, in order to overcome that issue.
5   But there was still the problem of basic training of
6   IT, never mind the system which was quite sophisticated
7   in what it did, and so how that was overcome and whether
8   it actually was overcome, I don't know.
9 **Q.** Do you think that training was underestimated at the
10   invitation to tender and procurement stages by ICL?
11 **A.** Yes.
12 **Q.** You have said in your statement at paragraph 5 that DSS
13   and the Post Office were blissfully unaware of how
14   unrealistic the timetable was.
15 **A.** Well, they put an indicative timeframe and the only way
16   that could be met was if the solution that we had got
17   and we had defined and we wrote it up and we put it in
18   a fully functional -- functional specification and said
19   "That's the system that we're going to deliver in that
20   timeframe". At that time there were 280 something
21   agreements to agree and we believed that CAPS was ready
22   to go and on that basis we demonstrated what our system
23   was capable of doing and we defined it in a functional
24   requirement.
25   What transpired was that that functional requirement
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1   was never approved by BA or POCL.
2 **Q.** It has been alleged that you obstructed the PDA in
3   getting hold of certain information. It has been said
4   that you had said that the contract prevented you from
5   providing them with certain information.
6 **A.** Well, that was the PFI. I mean I was -- I was, if you
7   like -- not instructed but certainly advised by my peers
8   and by my managers and seniors that a PFI contract meant
9   that we were to be left to develop the system, that was
10   our risk, our responsibility and whether we were
11   successful or not would be proved by acceptance.
12 **Q.** And you have said at paragraph 10 of your statement that
13   DSS and POCL were not ready, managerially or
14   technically. Why do you think that?
15 **A.** Because they couldn't answer the questions we were
16   asking. So if they had been ready, technically -- they
17   knew that we were interfacing with their systems so they
18   should have people in place ready to front those
19   questions and answer them and if we were having
20   difficulties in saying -- we needed to define an
21   interface specification between ourselves and several
22   other systems that we were interfacing with. With the
23   ones with TIP and the ones with CAP we never got that
24   specification to the level of detail that we needed and
25   when we had issues we didn't have people that could help
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1   us to resolve them.
2 **Q.** Do you think it would have helped to have shared more
3   information with the Post Office?
4 **A.** That was not in the nature of the contract, with
5   respect. You don't -- when you're carrying the risk
6   then the customer is taking a view that they wish to
7   transfer the risk to a supplier and that supplier then
8   defines the system in the way that they want to define
9   and therefore it's not a waterfall approach, it's not
10   a standard contract.
11   You needed a fully functional requirement in order
12   to do that.
13 **Q.** It may not have been part of the contract, but knowing
14   now what we know presumably more information sharing at
15   an earlier stage would have been beneficial, wouldn't
16   it?
17 **A.** Whether I believed it or not, it's not the nature of the
18   contract and I did have to adhere to my peers in that
19   way. It was not something that I could choose to do.
20 **Q.** Finally, you have also spoken about tensions between the
21   DSS and Post Office. Where were you getting that
22   information from and how did that impact on the work
23   that you were doing?
24 **A.** It was in meetings where they were -- both parties were
25   present and in memos and letters, if you like, in terms
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1 of emails and such. You could detect that there was
2 a difference in their objectives and I suspected that
3 was because the Benefits Agency were looking for
4 alternative ways other than the Post Office for solving
5 their problems and I think the Post Office were aware
6 that that was a possibility.
7 Q. How did that impact the work that was going on at ICL?
8 A. At my level it probably didn't. It meant that I was
9   being pushed in a certain direction by BA, if you like,
10   as the senior partner, even though that may not have
11   been in the best interests of POCL and I had to try and
12   balance the two because as far as I was concerned I'm
13   there to try and satisfy both parties.
14 MR BLAKE: Thank you, Mr Austin. I am going to hand over
15   now to Mr Stein and Mr Henry.
16   Sir, do you have any questions before I do that?
17 SIR WYN WILLIAMS: No, no thank you.
18   Questioned by MR STEIN
19 MR STEIN: Mr Austin, I have a number of questions for you
20   that relates to the operation of the system and the
21   start up for it. My name is Sam Stein. I represent
22   a large number of subpostmasters, mistresses and
23   managers.
24   You were asked a number of questions by Mr Blake
25   that touched on the question of whether the branch

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1 offices were going to be ready for automation. Forgive
2 me for perhaps being rather direct about this: wasn't it
3 blindingly obvious that some rural branch offices would
4 be totally incapable of automation from the beginning of
5 all of this?
6 A. Not to the extent that they were.
7 Q. Well, have you ever been to a countryside branch Post
8   Office in your entire life before you started working on
9   this project?
10 A. Well, they have a counter, don't they?
11 Q. Yes, but did you ever actually think about what the
12   implications were for small rural places that are going
13   to need to go from paper based into an automated base?
14 A. Absolutely.
15 Q. Right, so why was that not brought into the thinking in
16   relation to this project?
17 A. Well, it was as far as I was concerned. It was a major
18   issue.
19 Q. There appears to have been surprise from ICL that POCL
20   weren't aware of the possible demands of automation. If
21   you were aware of it and you were not surprised by it
22   and this was a matter that was concerning you, why
23   didn't you tell them to start off with?
24 A. We did.
25 Q. Right, so you're saying that you pointed out that some

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1 of these offices were not going to be suitable and you
2 are saying that POCL just didn't listen; is that right?
3 A. No, sorry, I'm saying that training -- I thought you
4   were on training.
5 Q. No, I was asking about automation, I thought that was
6   clear.
7   Well, what's the answer? Are you saying that you
8   were perfectly aware of potential problems with branch
9   offices but you didn't bring it to the attention of POCL
10   or are you saying --
11 A. Oh, yes, we did. Yes, we did.
12 Q. Right, so was that before contract was signed or after
13   contract was signed?
14 A. After the contract was signed.
15 Q. Right, why not before?
16 A. Because I wasn't given -- we weren't given the
17   opportunity to do that, as far as I can recall, and
18   I have to say we may well have done, I can't recall
19   that. I have to be honest --
20 Q. This is a major issue, Mr Austin, isn't it? The
21   question of trying to put automation into small branch
22   offices in the middle of the countryside: a major issue
23   and a potential problem, yes?
24 A. Yes.
25 Q. Later on, it cost something like 40 million to fix the

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1 problem, yes?
2 A. Yes.
3 Q. Why didn't your company point this out and say, "Look,
4   it's going to be obvious that this is going to be
5   difficult"?
6 A. We may have done but it wouldn't have been for me to
7   have done that. I can't recall, to be honest. I'm
8   being -- I'm sorry, I can't recall.
9 Q. You mentioned to Mr Blake the question of the
10   difficulties sometimes with the telephone line and then
11   the other types of lines that might be required to
12   assist with automation, yes?
13 A. Yes.
14 Q. Now, as we understand it, if the branch computer goes
15   offline within the Horizon System, there then needs to
16   be a reconciliation between the central servers and the
17   branch computer so that, essentially, they match; is
18   that right?
19 A. That's correct.
20 Q. So that this becomes vaguely comprehensible for
21   everyone, that means that one part of the system must
22   overwrite the other, so that there's consistency of
23   information between the two; is that correct?
24 A. The -- when the system comes back, the counter comes
25   back, it can be replicated from the centre. So it can

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1   be brought back up to where it was when it failed.

2   Q. Right. So what happens is that, if the system goes

3   offline, and it could go offline because its been turned

4   off, correct?

5   A. Yes.

6   Q. It could go offline because environmental factors have

7   caused an interruption in power supply?

8   A. Yes.

9   Q. It could go offline because of problems with the cabling

10   or something similar, yes?

11   A. Yes.

12   Q. So a variety of reasons could cause it to go offline,

13   yes. Now, that doesn't mean that, necessarily, when it

14   does get back in contact, that the two parts of the

15   system are going to have the same information by that

16   point, does it?

17   A. Not necessarily but it was designed to do so.

18   Q. In fact, it was designed, as we understand it, so that

19   the computer in the branch could, even if it was

20   offline, continue to provide service to customers; is

21   that correct?

22   A. If it was up and running, yes.

23   Q. If it was up and running. So, despite the fact that it

24   may not still be connected to the Horizon main system,

25   it can still provide customer support; is that correct?

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1   A. Correct.

2   Q. So when back online the plan was that the systems would

3   then reconcile one to the other?

4   A. Yes. The counter would reconcile back to the

5   correspondence servers, yes.

6   Q. Right, for obvious reasons, so that actually, in the

7   end, both sides of the system would end up with the same

8   information about transactions?

9   A. Yes, yes.

10   Q. Correct, right. How much of the code or the technical

11   specification for the software for the Horizon System

12   was available to you and your team?

13   A. Because the -- okay, you are referring to the Riposte

14   software that was responsible for keeping those message

15   stores in --

16   Q. Yes.

17   A. We were not allowed to see the code.

18   Q. Were your team capable of rewriting the code if it was

19   required?

20   A. Yes, if -- our team wouldn't have been, but we would

21   have had to commission someone to do so.

22   Q. So in order to deal with any Riposte system difficulties

23   with communication and communication errors, you had to

24   go to the Riposte system people; is that right?

25   A. Yes, my chief architect would do that.

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1   Q. What was the cost to the Post Office of doing so, if you

2   went back to Riposte?

3   A. None, as far as I'm aware.

4   Q. What about the cost to ICL: was there a cost there?

5   A. Sorry, I'm not sure about the question.

6   Q. Financial cost, was there a financial cost?

7   A. In going back to?

8   Q. To Riposte?

9   A. To change something?

10   Q. Yes, to get support or get the engineers to come through

11   or to get the code people to come and fix something?

12   A. Yes.

13   Q. Yes. Is that code still available now, so if we wanted

14   to check the system code right now, go back in time to

15   what was being used for what we call Horizon Legacy, is

16   that available?

17   A. I can't tell you. It was lodged in escrow.

18   Q. I'm going to ask you some questions about the original

19   agreement and that's going to require putting up on the

20   screen FUJ00000071. You should have on your screen,

21   Mr Austin, the first page of that.

22   I'm very grateful, Frankie.

23   As you can see, Mr Austin, this is just a reminder,

24   this is Post Office Counters Limited and ICL Pathway

25   Limited, the "Information Technology Services Agreement

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1   for Bringing Technology to Post Offices", and this is

2   the codified agreement. This is dated, as we understand

3   it, from the system in mid-1999, okay? So this is the

4   basic agreement between the parties, all right?

5   Now, I'm going to take you to a particular part of

6   this, if I may, please. Can we go to page 97 of 914 on

7   the Relativity system, sir, for your reference.

8   I'm going to read out this particular section,

9   Mr Austin, so that you have a moment to think about what

10   it says here and, therefore, from your point of view,

11   what it means. So this is under the heading

12   "Prosecution support":

13   "The Contractor shall ensure that all relevant

14   information produced by the POCL Service Infrastructure

15   at the request of POCL shall be evidentially admissible

16   and capable of certification in accordance with the

17   Police and Criminal Evidence Act (PACE) 1984 and the

18   Police and Criminal Evidence (Northern Ireland) Order

19   1989 and equivalent legislation covering Scotland."

20   At the next paragraph, 4.1.9:

21   "At the direction of POCL, audit trail and other

22   information necessary to support live investigations and

23   prosecutions shall be retained for the duration of the

24   investigation and prosecution irrespective of the normal

25   retention period of that information."

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1 So we can see that the heading for all of this is
2 "Prosecution support" and then between paragraphs 4.1.8
3 and 4.1.9 is basically saying that information's got to
4 be provided to the Post Office at the request of the
5 Post Office and it has to have certain evidentially
6 admissible requirements, and then the other part is
7 basically saying that, well, you need to keep the
8 information so it's available.
9 Just help us a little bit, please, with your
10 understanding of that. What was your understanding of
11 what would be evidentially admissible and capable of
12 certification in accordance with the Police and Criminal
13 Evidence Act 1984 at the time?
14 A. I'm not able to say that because that wouldn't have been
15 my responsibility. I'm not knowledgeable enough to know
16 what that -- would be required. That would be one of my
17 colleagues in the audit department there that would
18 have -- Martyn Bennett and Jan would have liaised with
19 the audit people within POCL to determine exactly the
20 nature of what they required.
21 Q. Who within ICL was responsible for making sure that ICL
22 was capable of fulfilling these prosecution support
23 requirements?
24 A. Martyn Bennett, in my opinion.
25 Q. Martyn Bennett. Help us, please, whether you are aware

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1 that ICL sought or did not seek an opinion from
2 an experienced criminal lawyer as to what this all
3 means?
4 A. I can't -- I can't --
5 Q. Again, are you referring that to Martyn Bennett?
6 A. I am, yes, because I wasn't responsible for that aspect.
7 Martyn would have come to me and said "This is what we
8 need to do", as he did when we produced the audit trail
9 capability.
10 Q. Right, well, let's just deal with this a little bit
11 more. What systems were you aware of that were put in
12 place, so that ICL could fulfil this requirement?
13 A policy, guidance, protocol --
14 A. I wasn't requested to do that.
15 Q. Well --
16 A. I was requested to put in an audit system, which we did,
17 which was to enable POCL to audit the system at various
18 points throughout, from the correspondence server right
19 through to the MIS, the back office system.
20 Q. Audit is not the same, is it? It's not the same as
21 providing information, which is evidentially admissible
22 and capable of (unclear) --
23 A. I was never -- that never came across my desk.
24 Q. Then why are you referring to audits?
25 A. Because the next sentence, which you referred to, which

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1 is the direction of POCL's audit trial.
2 Q. All right but what protocols or systems were put in
3 place for the first part, 4.1.8; do you know?
4 A. No, I don't.
5 Q. No. Your job, as we understand it, if I recall from
6 your statement, is that this is meant to be dealing with
7 the implementation of the system, getting it up and
8 running, getting it going, getting it going to the
9 acceptance requirements, yes?
10 A. Yes.
11 Q. Right.
12 A. And to deliver to a business requirement specification
13 as produced and signed off by POCL. That was never
14 anything that I ever saw.
15 Q. Well, this is part of their business requirements,
16 Mr Austin.
17 A. Not as I saw.
18 Q. Why not?
19 A. I don't know.
20 Q. Do you understand the importance --
21 A. Absolutely, I understand the importance -- I absolutely
22 understand the importance but nobody said or asked me,
23 or laid down in writing what was required in order to
24 meet that requirement. That's in a contract, with
25 respect, that's not in a business requirement.

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1 I delivered things to a business requirement.
2 That's a document that says "These are our business
3 functional requirements".
4 Q. Right. So you delivered things to, let me see, the
5 acceptance criteria, that was what you were aiming at?
6 A. No, the set of business requirements. The acceptance
7 criteria was based on the business requirements.
8 Q. Right, okay. So the business requirements, as far as
9 you can say and recall, did not include a reference to
10 the prosecution support section?
11 A. No.
12 Q. I see. If we can just scroll down the page a little bit
13 more, it says at 4.3 "Training and Training Material".
14 Frankie, if we just go down to 4.3, thank you very
15 much.
16 Now, there's a reference to:
17 "The Contractor shall prepare all training events
18 and training material ..."
19 Can you help, from your recollection, with what
20 training events and training material was even
21 considered to try and provide the prosecution support
22 that we have just been looking at?
23 A. No, that was the responsibility of someone else.
24 Q. Mr Bennett?
25 A. No.

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1   Q. Who else?
2   A. I can't recall, but it was within Mike Coombs' area. He
3   would be able to say who was responsible for doing it.
4   Q. I see.
5   A. It was a -- training and implementation were not part of
6   my responsibility.
7   Q. If we can go one step down, please, Frankie, just
8   a little bit further down that page. Yes, at 4.4.2 you
9   see there that:
10   "The Contractor shall ensure that all materials
11   which are used for producing documentation relating to
12   POCL services, conform to relevant parts of POCL's
13   Environmental Policy Summary."
14   Well, obviously we would all agree that that should
15   be done. Do you recall whether there was any summaries
16   or policies provided to you from POCL as regards the
17   operation of the prosecution support section?
18   A. No.
19   MR STEIN: One moment please.
20   **(Pause)**
21   Thank you, sir.
22   SIR WYN WILLIAMS: Thank you. Could that document be taken
23   down, please. Thank you.
24   MR BLAKE: Sir, I believe Mr Henry is now going to be asking
25   some questions. There is one document that --
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1   SIR WYN WILLIAMS: Sorry, Mr Blake, can you stop. I can
2   hardly hear you.
3   **(Pause)**
4   MR BLAKE: Sir, there is one document that Mr Henry will be
5   taking the witness to that the witness hasn't had
6   an opportunity to look at before, it is going to be
7   brought up on screen.
8   Mr Austin, if you need any more time on any of the
9   documents, please do say so and we can take some more
10   time on that. Thank you very much.
11   **Questioned by MR HENRY**
12   MR HENRY: Hello, Mr Austin. Yes, no desire at all to
13   ambush you so please do follow Mr Blake's suggestion,
14   but could we go to FUJ00036863, please.
15   Now, sir, is this a document that you have seen
16   before?
17   SIR WYN WILLIAMS: Sorry, is that addressed to me, Mr Henry,
18   or Mr Austin?
19   MR HENRY: Well, may I, like the duck/rabbit, ask you both,
20   sir.
21   SIR WYN WILLIAMS: Well, I can't put my hand on my heart and
22   say one way or the other. I have seen so many
23   documents, Mr Henry, but I'm very happy for you and
24   Mr Austin to discuss this document and I will do my best
25   to follow.
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1   MR HENRY: Thank you very much, sir.
2   Mr Austin --
3   A. I have not seen this document.
4   Q. Well, look, Mr Austin, I don't want to take you by
5   surprise and I'm going to make it absolutely clear to
6   you that if you need time to think, please do so, but
7   this is produced, obviously from Fujitsu. It looks like
8   it is a sort of helpdesk file because John Simpkins
9   opens up the entry and it is talking about calls. So
10   would you be prepared to agree with that?
11   A. Yes.
12   Q. Good. It looks like it was opened, if we go to the very
13   top of the page, just underneath the grey headline,
14   "Opened", 9 December 1999 at 11.00 am.
15   A. Yes.
16   Q. And last update, 21 February 2000, and so there's a call
17   which we can see at 11.00 am.
18   Then could we go down a few lines and we've got at
19   11.00 am again, John Simpkins -- it's about six or seven
20   lines down:
21   "EPOSS transactions. The EPOSS problems look to be
22   related to Existing Reversals (often of the settlement
23   line)."
24   So that looks like it's a balancing the books
25   problem, does it not?
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1   A. It looks like that.
2   Q. Thank you. I'm going to ask you now to go to page 2,
3   please, the lady who is assisting us, and we can see
4   an entry at line 4 from Mr Steve Warwick. It's 9.28.14
5   on 10 December, and it says:
6   "Passing to EPOSS-FP for urgent analysis. This call
7   is related to AI376 and will require resolution before
8   the commencement of Rollout in January."
9   You see that?
10   A. Yes.
11   Q. We know what 376 was and obviously that would have been
12   a major --
13   A. Absolutely.
14   Q. Quite so. Could we now go to page 5 please. At page 5
15   there is a Francesco Chiarini. Do you remember
16   Mr Chiarini?
17   A. No. This is when my development team and a lot of my
18   technical experts had moved over into the support
19   environment.
20   Q. Yes.
21   A. So they would have been fronting and going through that
22   process.
23   Q. So they would have been customer faced?
24   A. Yes.
25   Q. Right, okay.
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1   **A.** And the support teams, the actual development support
2   teams, the expertise, for example Steve Warwick -- and
3   I don't know who Francesco Chiarini is but he would be
4   someone, I would assume, would be in that environment.
5   **Q.** I see, thank you. So we've got here, haven't we, at
6   11.37.17, and it says, forgive me:
7   "FAD322704: Problem in the Scales transaction.
8   A fix was delivered in WP5447 on 20/8/99, but the
9   counter had a previous version ..."
10   Now is this -- and I don't ask you to speculate, but
11   is this an instance where perhaps, unknown to people
12   trying to fix things, a fix had already been applied, or
13   an update hadn't yet taken place and so therefore the
14   fix was not effective? "A fix was delivered in WP5447
15   on [20 August '99] but the counter had a previous
16   version", and then it gives WP4775. The "but" seems
17   significant, doesn't it?
18   **A.** What it is suggesting is that the fix was -- didn't
19   arrive at the counter, the right version of the fix
20   didn't arrive at the counter, that's what it's
21   suggesting.
22   **Q.** Right, thank you. Then we've got, below there -- I'm
23   going to just say FADS, about five of them:
24   "The problem has been identified and can be
25   reproduced."

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1   Then I omit words:
2   "The other reversals are being investigated."
3   Is this again where the books are not balancing
4   reversals?
5   **A.** That's what it would appear to be, yes.
6   **Q.** Then if we just move down the page to Mr Chiarini at
7   14.30.27:
8   "Further investigation has not been able to get to
9   the root of the problem."
10   You see that?
11   **A.** Yes.
12   **Q.** So this was obviously, as you have said several times,
13   very, very difficult, complex -- complex, quite unique
14   problems arising.
15   **A.** A combination of circumstances, yes.
16   **Q.** Yes. But, obviously, this is suboptimal because you've
17   got your brightest and the best, subject to the
18   qualification you gave in evidence, trying to sort this
19   out?
20   **A.** Yes.
21   **Q.** Can we go, please, to page 7 and this is at 17.45, it
22   says:
23   "Deleted User (Mark McGrath left [July]/00). I have
24   released a fix for this in WP7029 -- to be applied AFTER
25   7012."

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1   Can you work that out? Do you know what that means?
2   **A.** No, I'm afraid I can't.
3   **Q.** Because you see the name "Austin", and maybe this is
4   a coincidence, appears just after that, doesn't it?
5   **A.** It does and I can't explain that because I had nothing
6   to do -- directly to do with this exchange or in the
7   fixing, because this was a team not reporting into me.
8   **Q.** I see. So --
9   **A.** So I don't know why "Austin" is there.
10   **Q.** I see. You can't -- I mean, would this team, even
11   though they weren't reporting into you, given your
12   seminal role in development, might they not have been
13   consulting with you?
14   **A.** No.
15   **Q.** No? Not at all?
16   **A.** Not at all.
17   **Q.** "The response was delivered on the system", that's at
18   17.46, and then could we go, please, to page -- forgive
19   me while I just scroll it up.
20   Forgive me, sir, I'm just having difficulty with my
21   one.
22   Yes, could we go to page 8, please. Do you see at
23   2 February 2000 at 18.17.25:
24   "Please inform me when this is released to live."
25   Can you remember what that was about?

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1   **A.** I'm sorry, I'm just trying to find it.
2   **Q.** That's John Simpkins, it's about six up from the bottom?
3   **A.** Yes, yes.
4   **Q.** "John Simpkins notified as requested. The fix has been
5   released to live."
6   Then finally, over the page, I'm going to ask you
7   now about Colin Baker. Can you help me, please, about
8   Colin Baker, who is he?
9   **A.** I don't know.
10   **Q.** Sir, you will see it is about the last eight/nine lines.
11   21 February 2000:
12   "We are unable to test this in PI Test but we are
13   NOT aware of the problems described as occurring in our
14   environments."
15   Then this:
16   "I can only suggest that we be aware of potential
17   problems and raise them if and when they occur.
18   "The Call record has been transferred to the Team:
19   QFP."
20   Do you know what that team was?
21   **A.** No, sorry.
22   **Q.** I mean, this does not necessarily appear to be as
23   coherent as what you suggested in evidence, that this is
24   a somewhat as and when, ad hoc response to problems
25   rather than a coherent policy of investigation and

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1		weeding out and rectification?
2	A.	It does appear like that, I agree, but this was part
3		of -- as I said, the development and the testing and
4		error fixing was within the customer services arena.
5	Q.	Absolutely, and it would be obvious, wouldn't it, that
6		the Post Office would be aware of this as well?
7	A.	Yes, I would assume so, yes.
8	Q.	Absolutely. Could we just consider now, in the time we
9		have -- and I will finish before lunch, sir -- Horizon,
10		for POCL's specific needs, was a frantic afterthought,
11		wasn't it?
12	A.	No, no. The reason it may appear like that is because
13		we didn't have a documented functional requirement.
14	Q.	You mention that because you thought that it was
15		apparent from both the DSS and POCL that they thought
16		that they could just give you the functional
17		requirements before it was supposed to go initially live
18		in 1997. You say that in your statement?
19	A.	Absolutely. It became apparent to me that they didn't
20		understand the basic philosophy of a PFI, in that you
21		write the specification, you then get a quote and then
22		you deliver to what you said you would deliver and the
23		functional requirement. And that's the reason why, in
24		the contract that we gave to BA and POCL, in the
25		contract that was signed, it said that within 30 days of

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1	A.	Correct.
2	Q.	Absolutely. So that's what I suggest is the reason why
3		it was a frantic afterthought because what effect did
4		that have on the time you had available to address what
5		POCL specifically required?
6	A.	The remaining time that we had to get a release is that
7		we were agreeing with POCL what we would try and deliver
8		by what dates and in order to do that we needed POCL to
9		provide a functional requirement for us --
10	Q.	May we go --
11	A.	-- and to sign off the designs.
12	Q.	I'm so sorry, sir, I didn't mean to cut across you. I'm
13		just anxious about time because I don't want you to be
14		here after lunch.
15		Could we quickly go to your witness statement,
16		please, at paragraph 8, your witness statement --
17		forgive me, I had the number to hand but I don't think
18		it should be ... thank you so much. If we go to
19		paragraph 8, please. Thank you. Do you see the last
20		three lines?
21	A.	Yes.
22	Q.	You're dealing, first of all, with the DSS, Benefits
23		Agency and the rejection of the BPC. Then this:
24		"There was very little functionality introduced for
25		POCL consequently it has limited relevance to [the

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1		the contract being signed they would sign off the
2		functional requirement.
3	Q.	Right.
4	A.	Because that's what we had.
5	Q.	Let's hold that because what you said there is very,
6		very important but I want to address a more fundamental
7		problem as to why I suggest it was a bit of a frantic
8		afterthought. You, of course, worked for ICL from 1995
9		to October 2000?
10	A.	Correct.
11	Q.	But, obviously, Pathway and Horizon had been in
12		development before you joined the company?
13	A.	Pathway bid team was in before I joined the company,
14		yes.
15	Q.	Fine. But I want to ask you about this, that the
16		Benefit Payment Card was scrapped in May 1999, wasn't
17		it?
18	A.	It was.
19	Q.	Yes, and POCL, of course, wanted to continue with the
20		Benefit Payment Card but the DSS wouldn't support them?
21	A.	Is what I understand to be the case.
22	Q.	Yes. ICL were initially supportive of POCL's position
23		but, eventually, you know, had to accept the inevitable,
24		as did POCL, that the BPC was dead in the water,
25		correct?

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1		Inquiry]. In fact, when the DSS made the decision to
2		cancel the project in May 1999, all the relevant card
3		software was removed from the ICL Pathway solution. The
4		POCL Horizon project only came into existence in the
5		spring 1998 and a new agreement with Post Office
6		Counters Limited signed in July 1999."
7		In fact the Benefit Payment Card was scrapped
8		in May 1999, wasn't it?
9	A.	That -- yes, I have put May 1999:
10		"In fact, when the DSS made the decision to cancel
11		the project in May 1999~..."
12	Q.	Exactly. So very little functionality for POCL, and you
13		give the explanation in paragraph 9, because it really
14		was because DSS was the dominant partner and the Benefit
15		Payment Card was the priority and so therefore the BPC
16		had taken precedence. Do you see your exact words:
17		"There was no doubt that the DSS were the dominant
18		partner, and the benefit payment functionality took
19		precedence over the ... EPOSS functionality which would
20		be developed in parallel over a longer period using
21		[the] iterative development approach."
22	A.	I am referring to the Initial Go Live.
23	Q.	Yes.
24	A.	I'm not referring to the project as a whole. I'm trying
25		to say that the Initial Go Live had little relevance

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1 because it was mainly BA functionality that we
2 delivered.
3 **Q.** But when you say that the DSS material was stripped out
4 of the project, would that have included the work on the
5 fraud management system because were you aware that
6 a major component, the fraud management system, was
7 removed from the contract that POCL eventually signed?
8 **A.** I can't be sure. I have not heard of the term "Fraud
9 management system". If you're saying the fraud
10 procedures -- we were instructed to remove all the code
11 that was to do with the benefit card system.
12 **Q.** So it may have been -- and I'm not asking you to
13 speculate, but it may have been that all of this
14 anti-fraud architecture was connected to the benefit
15 card and when the benefit card was scrapped, then all of
16 that architecture went as well?
17 **A.** I understand the point you're making and I'm trying to
18 cast my memory back, is that we were instructed that we
19 must remove all the benefit card functionality from the
20 system, which was quite a large task and really did
21 demotivate my team because --
22 **Q.** It demotivated?
23 **A.** Very much so because they had spent quite some time
24 developing that.
25 **Q.** Absolutely. They had invested, as had the company, time
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1 and effort and so therefore, at the very time that
2 you're trying to actually produce something for POCL,
3 your team are obsessed and under the cosh at actually
4 doing completely dead work, removing all of that
5 architecture?
6 **A.** There were two separate teams. The people that were
7 removing the BPS, all the functionality for that, were
8 not the same people that were developing on the POCL
9 side. It was, as I said, being run in parallel. So I'm
10 referring to the fact that we literally had to kill all
11 the software and all the work we had done on the
12 benefits payment system and then run in parallel and put
13 all our resources into EPOSS.
14 **Q.** So this brings me to my final point and this was the
15 point that you raised earlier, in fact, about "They
16 didn't understand the PFI", et cetera, et cetera,
17 because this actually turned from being a PFI to
18 a turnkey contract, didn't it, effectively?
19 **A.** My colleagues who were responsible for that negotiation
20 and the agreement that came to pass and, yes, it became
21 more traditional.
22 **Q.** Yes, absolutely. So this was, as you anticipated in
23 fact at the beginning of your statement at
24 paragraph 5 -- you know, you thought it was an
25 incredibly ambitious timescale and you thought, really,
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1 from the beginning it ought to have been a turnkey or
2 off-the-shelf?
3 **A.** I did, that was my personal view.
4 **Q.** But of course turnkey or off-the-shelf doesn't mean
5 bespoke, does it?
6 **A.** No.
7 **Q.** It doesn't even mean made to measure, does it?
8 **A.** No. Well, it means we developed -- we had got
9 a product, the Riposte product, and then we developed
10 the BPS aspect of it and that was live and ready to go.
11 **Q.** But it's very much working out compromises and make do
12 and mend, isn't it?
13 **A.** We still had to deliver to the business functionality.
14 We still -- we were guided -- we had to develop a system
15 that met the requirement.
16 **Q.** I know, but --
17 **A.** The business requirement.
18 **Q.** Unfortunately however, as is plain, it didn't.
19 **A.** Which bit?
20 **Q.** Well, I mean you even said to Mr Blake, you didn't
21 understand how you could achieve a product which would
22 deliver to the business what they wanted. I mean you
23 were doing your best, but it had, as it were, morphed so
24 many times --
25 **A.** That's true. I mean, from a development team, we were
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1 getting hit by functionality we had never seen before.
2 **Q.** Exactly.
3 **A.** And it was growing at a massive rate and my team was
4 growing at a massive rate.
5 **Q.** Right, so it comes to this and this is, I promise you,
6 my final question: you have stated, and Mr Blake has
7 taken you through it, that paragraph 22 of your
8 statement -- no need to bring it up, paragraph 23 -- you
9 were aware of bugs, errors and defects. July 1997, it
10 wasn't sufficiently robust, you bring in Escher and
11 Riposte, correct?
12 **A.** Correct.
13 **Q.** But paragraph 26, September 1999/October 1999 -- no need
14 to bring it up on the screen, FUJ00079782 -- I mean,
15 post-Escher and Riposte, it still, quite frankly, is not
16 fit for purpose, is it?
17 **A.** It didn't go to Escher for that reason. It went to
18 Escher for a specific reason, in that the product,
19 EPOSS, was not interfacing with Riposte correctly.
20 **Q.** Right.
21 **A.** So the rest of the EPOSS product was as is. Escher
22 didn't touch it.
23 **Q.** Leaving that aside, September/October 1999 --
24 FUJ00079782 -- it was still not fit for purpose?
25 **A.** No, and we had to put substantive corrective actions in
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1   place.
2 Q. But the substantive corrective action, as you say in
3   your statement, was only to concentrate on 80 per cent
4   of the bugs, errors and defects?
5 A. No, no.
6 Q. Well, let's go to your statement.
7 A. No, I did say that. I just want to clarify. What we
8   said was that we could stabilise the product. We
9   couldn't fix everything, we could stabilise the product
10   by targeting the 80 per cent because 80 per cent of the
11   bugs and defects were due to a particular area of the
12   system and we attacked that.
13   We also attacked the others, but -- and fixed a lot
14   of problems in those areas, but the instability issue
15   and the not fit for purpose was mainly due that people
16   were seeing so many large amount of errors that they
17   were using that as a yardstick to determine whether the
18   project was fit for purpose or not.
19   So if you fixed the 80 per cent, you were then left
20   with the 20 per cent, of which a lot of them you did fix
21   but, overall, the product was becoming more and more
22   stable.
23 Q. But, nevertheless, given the imminent -- well, given the
24   rollout and given what we now know, it was
25   a catastrophically dangerous thing to have happened

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1   because of the number of unknown unknowns and the
2   factors you have already said, that when you were fixing
3   things, you were sometimes introducing further problems,
4   unintentionally and unwittingly?
5 A. Well, when you do that, that's what regression testing
6   was due to find and it did, so if that happened -- you
7   couldn't be 100 per cent, but regression testing was
8   there to try and avoid that happening.
9 Q. But all the time the Post Office was aware of this as
10   well: the level of errors -- the level of bugs, errors
11   and defects?
12 A. I believe so.
13 Q. Thank you.
14 A. Because I -- sorry, just to --
15 Q. Yes, please.
16 A. I didn't specifically hide that from POCL. I wasn't --
17   as far as I was concerned, acceptance and the errors and
18   defects we were having, whether it was under the
19   instability issue which I have discussed prior to that,
20   which was very difficult to crack, 298, and then 376
21   which was the balancing issues, we took those extremely
22   seriously and if we would have not solved those, we
23   wouldn't have achieved acceptance.
24 Q. Who was your counterpart at POCL then, if you didn't
25   hide it from POCL?

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1 A. I didn't have a counterpart.
2 Q. You didn't? But you --
3 A. The nearest person that would -- if you like, that
4   I will be talking with would be John Marr.
5 MR HENRY: John Marr. Thank you very much, sir.
6 MR BLAKE: Sir, can you hear me?
7 SIR WYN WILLIAMS: Yes.
8 MR BLAKE: Thank you. I just have one very brief follow-up
9   question and also Mr Maloney is going to ask a question
10   or two as well.
11 MR MALONEY: Sir, no. We have no questions. We have
12   provided very detailed rule 10 requests and, if we may
13   say, with respect, Mr Blake has very ably covered all
14   the questions we identified in respect of this witness.
15   So we have no questions.
16 SIR WYN WILLIAMS: That's fine.
17   **Further questioned by MR BLAKE**
18 MR BLAKE: Thank you very much. So it's just one question
19   from me then.
20   We have seen the PEAK and PinICLs and I think your
21   evidence was that you believed the Post Office had
22   access to those. Would it surprise you if, in fact,
23   they didn't have access to those?
24 A. I believed that POCL were -- had people that were part
25   of the helpdesk community so, from that perspective,

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1   I can't believe that they weren't given access to that
2   system. I don't know whether they were able to
3   contribute to it, but I can't believe they weren't given
4   access to it. They were part of the same team of
5   experts.
6 Q. Would it have been best practice for them to have had
7   access?
8 A. I would -- yes.
9 MR BLAKE: Thank you very much. Sir, I don't have any
10   questions unless you do, sir?
11   **Questioned by SIR WYN WILLIAMS**
12 SIR WYN WILLIAMS: I just wanted to ask Mr Austin, there was
13   reference in one of the emails which Mr Blake showed you
14   to a man called Gareth Jenkins.
15 A. Yes.
16 SIR WYN WILLIAMS: Was Mr Jenkins part of your team?
17 A. Not that I can remember.
18 SIR WYN WILLIAMS: Did you know him at all?
19 A. Not that I can recall.
20 SIR WYN WILLIAMS: Fine. Thanks very much.
21   Thank you very much for making your statement,
22   Mr Austin and also for coming to give oral evidence.
23 A. Thank you.
24 MR BLAKE: Thank you. 2.00, please, sir.
25 SIR WYN WILLIAMS: Certainly, yes.

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1	(1.02 pm)
2	(The luncheon adjournment)
3	(2.00 pm)
4	**MS KENNEDY:** Good afternoon, sir. Can you see me and hear
5	me?
6	**SIR WYN WILLIAMS:** I can indeed.
7	**NEW SPEAKER:** Our next witness is John Bennett.
8	**JOHN BENNETT (sworn)**
9	**Questioned by MS KENNEDY**
10	**MS KENNEDY:** Mr Bennett, I am Ruth Kennedy and I ask
11	questions on behalf of the Inquiry, as you know.
12	Could you confirm your full name, please?
13	**A.** John Hamish Bennett.
14	**Q.** In front of you, you should have a copy of the witness
15	statement that you prepared; do you have that?
16	**A.** Yes, I do.
17	**Q.** Have you read through this statement recently?
18	**A.** Yes, I have.
19	**Q.** If you turn to page 10 of that statement --
20	**A.** Yes.
21	**Q.** -- is that your signature there?
22	**A.** Well, the one I've got here hasn't been signed -- yes,
23	it is, I can see it here. Yes, it has been signed; that
24	is my signature.
25	**Q.** Is it true to the best of your knowledge and belief?

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1	exercise. It ran -- took about two years for the
2	contract to be eventually let. The contract was
3	eventually placed with ICL. I continued to work on that
4	contract.
5	The company was reformed as ICL Pathway in --
6	**Q.** I think that happened -- sorry, I was just going to say
7	I think that happens in 1995 --
8	**A.** I'm sorry, yes.
9	**Q.** -- that ICL Pathway is set up. You then take over as MD
10	of that company in 1995, in the newly set up company?
11	**A.** Yes, that's correct.
12	**Q.** Can you briefly explain, in your view, what the purpose
13	of what would become the Horizon project -- what the
14	purpose of the project was?
15	**A.** Well, it started, of course, with two major customers,
16	two major clients, and they both had somewhat separate
17	but joint agendas -- well, they joined up, but the
18	essential feature for Post Office Counters was to fully
19	automate their extensive network of post offices, which,
20	until that time, was still running on mainly manual,
21	paper process. So they needed to automate their entire
22	network, for one thing to deliver their existing
23	services but, more importantly, to build a platform for
24	future business within the Post Office network.
25	The Benefits Agency, which were, of course, a -- and

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1	**A.** Yes.
2	**Q.** I'm going to start by asking a few questions about your
3	background. Please could you explain your background
4	prior to joining ICL?
5	**A.** I -- when I graduated I joined a company called English
6	Electric-Leo-Marconi, which eventually became part of
7	English Electric and therefore picked up what's in
8	paragraph 1 here.
9	**Q.** What did you initially do when you arrived at ICL? What
10	roles did you have?
11	**A.** Sorry, what?
12	**Q.** Roles.
13	**A.** Rules?
14	**Q.** Roles.
15	**A.** Roles, I apologise.
16	**Q.** Excuse my Northern Irish accent.
17	**A.** Yes, I started my career as a computer programmer and
18	progressed from that into systems engineering and
19	eventually into sales. Then through sales management
20	and then followed the track which you have here in
21	paragraph 1.
22	**Q.** What role did you have between 1994 and 2000?
23	**A.** 1994 and 2000. In 1994, I took over the responsibility
24	for managing the ICL team, which was bidding for the
25	BA/POCL PFI contract, so it started as a pre-sales

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1	had been for a long time -- a customer of the Post
2	Office Counters needed to develop a new and more
3	automated system for the payment of benefits and the
4	contract called for a Benefit Payment Card to achieve
5	that, and the key driver there was a more efficient
6	system but perhaps, even more importantly, a system
7	which had a substantially lower element of fraud.
8	So the two customers were joined together to both
9	deliver their separate business objectives.
10	**Q.** At the time of the procurement exercise, did you feel
11	that ICL Pathway could deliver and meet those two aims?
12	**A.** When the business -- when the sales campaign started and
13	from all the invitations to tender and everything, yes,
14	I was confident that we could deliver a system to meet
15	this requirement.
16	**Q.** How important was training in respect of that vision?
17	Did you see that as an important element of the project?
18	**A.** A key feature of the programme, particularly for Post
19	Office Counters -- not so much the Benefits Agency, but
20	for Post Office Counters was the training of, I think,
21	in excess of 30,000 staff to use the new system. And
22	many people referred to the programme as one of the
23	biggest management of change programmes in the UK and
24	perhaps in Europe and, as a management of change, it did
25	affect the working practices of an extremely large

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1   number of people, so training was a key feature of that
2   programme of change and we were responsible within the
3   contract for delivering training facilities to all those
4   numbers of staff I have just referred to.
5 **Q.** I'm now going to take you to some board minutes of
6   a meeting on 3 October 1995. If we could turn up
7   FUJ00077832, please, and if we could turn to page 3
8   please. You can see that this is a note of the board
9   meeting on 11 October 1995. If we turn to page 3 and at
10   (d), the top (d), it says:
11   "As noted at the last meeting, we were still
12   experiencing considerable difficulty with the way the
13   procurement was developing. POCL/BA were attempting to
14   rewrite the SSR [which is the statement of service
15   requirements] via detailed contract schedules, then
16   would implement change control so that 'level playing
17   field' would be achieved with only one substantial
18   variable left upon which to make a final decision
19   between the three shortlisted suppliers, namely price."
20   At this stage, the three shortlisted suppliers were
21   Cardlink, IBM and Pathway; is that right?
22 **A.** Correct.
23 **Q.** In relation to price, what did you mean when you said
24   that the final decision would be made on "namely price"?
25 **A.** Well, it was a competitive international tender and once

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1   all three shortlisted suppliers were compliant then
2   price would be, in my reckoning, the predominant
3   criteria for selection.
4 **Q.** Did you feel it was important then to be the cheapest
5   option in order to win the contract?
6 **A.** There was no way of judging whether we were the cheapest
7   bidder. We had no access to the costs and prices of our
8   competitors' bids. We could only price our bid at the
9   best level we could, compatible with delivering the
10   contract and making a return for the company, but we had
11   no access to other people's prices.
12 **Q.** No, but you have just said that you had an instinct or
13   a desire to pitch it at the cheapest workable amount; is
14   that right?
15 **A.** We would always bid at a level we thought we could win
16   the contract.
17 **Q.** Looking down the page to (c), if we could just scroll
18   down, it says:
19   "It was acknowledged that Riposte, produced by
20   Escher, was vital to our proposed solution yet there had
21   as yet been no effective technology transfer path agreed
22   to Pathway. Mr Bennett would prepare a paper on
23   proposals to deal with this issue, and try to ascertain
24   any technical or commercial/legal concerns that Escher
25   had."

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1   Pausing there, Riposte, that was the software that
2   was required to make the whole project work, isn't that
3   right?
4 **A.** It was one of the essential products, it wasn't the sole
5   product, but it was a critical product to be installed
6   in every post office, so, yes, it was a critical
7   component of our solution.
8 **Q.** At this stage, did you have a good grasp of the Riposte
9   product and how it worked and how it would function with
10   the project?
11 **A.** Can you remind me what the date of this document is?
12 **Q.** Yes, it's 3 October 1995.
13 **A.** 1995? Well, that's very early in the process. I think
14   we had, at that time, deduced that Escher, with their
15   product, was ideally suited for this solution. It had,
16   as you probably know, already been implemented in the
17   Irish Post Office. An Post had also used this software
18   from Escher and, having seen the An Post use of this
19   software, we were satisfied that this would be a good
20   fit for the requirement of meeting the needs with this
21   contract.
22 **Q.** But at this stage, you still had quite a lot of work to
23   do to understand how it would fit in this specific
24   project; would you agree with that?
25 **A.** We had a lot of work to do to understand how it would

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1   fit and, also, which I think this leads on to, how to
2   manage our relationship with this small company. Both
3   of those factors were well understood in 1995.
4 **Q.** You also wrote a report that's appended to the end of
5   this document and if we could turn to page 8, please,
6   and if we look at the first paragraph, it says:
7   "The last four weeks have seen very slow progress on
8   the Stage 3 plan. BA/POCL have found it increasingly
9   difficult to meet their timescales for schedule
10   production and release. Progress has slipped 2/3 weeks
11   in 4 weeks with little confidence in future dates and
12   their achievement.
13   "Pathway has not been without its own concerns.
14   Product descriptions have progressed only after intense
15   and tiring effort; a number of key components for WINDEM
16   are still outstanding; in short there is a sense of the
17   procurement becoming bogged down."
18   What did you mean by that last sentence, that there
19   is a sense of the procurement becoming bogged down?
20 **A.** I think there was quite a big issue here which reflects
21   later through the documents -- and perhaps you will
22   review -- which was that we were dealing with what was
23   essentially a PFI contract and a PFI contract being let
24   for a complex IT bespoke system was something I hadn't
25   experienced before. And there was a conflict beginning,

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1   I think, to build up between how you could achieve a PFI
2   contract with all the risk transfer requirements,
3   alongside how and who had responsibility for design.
4   And, I think, somewhere in here that is an element of
5   where the procurement became difficult.
6   It took a long time for the procurement to complete.
7   It was -- I think I said over two years, which is
8   an awful long time for a IT procurement and I think
9   a lot of it reflected the difficulty of letting a PFI
10   contract. This was not a standard IT supply or even
11   service contract, and the whole basis of it required
12   a lot of hard work and difficulty in the procurement
13   phase, and I think it's -- I just say here, and even
14   when that procurement eventually became a contract, the
15   contract documentation was still in many ways incomplete
16   and had to be dealt with by all the parties
17   post-contract.
18 Q. Yes, and if I can ask you to turn to a board minute from
19   1996. If we pull it up, it's FUJ00077839. This is
20   a board meeting on 21 February 1996 and if we turn to
21   page 2, please, and if we can pull up this second
22   paragraph, thank you. In that second paragraph, picking
23   up on this point that you mentioned, you say:
24   "If this work is left until after the Service
25   Provider's selection then it is difficult to see how

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1   a binding contract could be entered into and accepted by
2   either party."
3   So that was an issue you were very aware of in 1996?
4 A. I'm just trying to look in this paragraph to where
5   that -- what you just read out. Is it in the -- can you
6   just remind me where it is?
7 Q. Yes, let me find it for you. My apologies, it's
8   actually the paragraph before.
9   That's why you couldn't find it, and it's the last
10   bit of the second paragraph, if you see it says:
11   "If this work ..."
12 A. I see, yes. Yes, I understand that now, yes. And the
13   question was?
14 Q. So at this stage, you are raising this as an issue, the
15   difficulty of securing a valid and binding contract
16   between all the parties.
17 A. Yes, and it's accentuated by the fact that, being a PFI
18   contract as the provider, then we would only begin to
19   earn revenue from the contract during the steady state
20   or operating phase of such a contract, and the longer
21   the procurement -- or the longer it took post-contract
22   to sort out these outstanding issues would quite
23   naturally delay the time by which we could enter steady
24   state and, by implication, how we could get our returns
25   from this substantial investment.

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1   So one thing is delaying the contract but equally
2   important is the issues left unresolved in the contract,
3   which still have to be sorted out and you -- later on,
4   but perhaps it is worth mentioning now, we entered into
5   a situation where there was a -- things called
6   agreements to agree, you will find this percolating
7   through a lot of this documentation.
8   An agreement to agree was a sort of legal camouflage
9   for hiding difficult issues. It said that the parties
10   would use reasonable endeavours to sort out things they
11   couldn't sort out during the contract negotiation but,
12   by their very nature, it led to delay and difficulty for
13   everyone and I would say that we didn't get to the
14   bottom of agreements to agree for quite a few years.
15 Q. If we could scroll further down this document so that it
16   is showing what it was showing before and at the end of
17   the second paragraph that's shown there, again picking
18   up on something you have already mentioned, the last
19   sentence says:
20   "There is a growing awareness that the structural
21   weakness of this procurement is having two customers who
22   see the world from quite different perspectives."
23 A. Yes.
24 Q. At this stage, though, you still felt like the project
25   was doable and that it was something that ICL should

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1   continue to bid for; is that right?
2 A. I think I'm going to say yes, but presumably the date of
3   this -- is this -- this is before the contract was let,
4   isn't it?
5 Q. It's 21 February 1996?
6 A. So it's a few months before the contract was let.
7 Q. Yes.
8 A. Yes, I think we did. I think we were alive to the fact
9   that this was an unusual contract in having two
10   customers in one contract. That did give rise to,
11   downstream, quite a few difficulties which we might
12   refer to later but at this stage in the process we
13   accepted this as being what the contract was and what we
14   were bidding for.
15 Q. The next paragraph goes on to mention the risk register.
16 A. Yes.
17 Q. Could you explain a bit about that?
18 A. Well, we started constructing a risk register both in
19   a pre-sales environment, in other words what are the
20   risks of bidding or winning this contract, and in some
21   ways were the risks worth taking, should we in fact
22   continue with the bid, that's what the risk register was
23   about in the pre-sales environment and it is true
24   because I can read here that we refer to Escher and
25   I guess we refer to Escher more later.

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1   **Q.** Yes.

2   **A.** But I think there was a recognition, both in the

3   pre-sales risk register, that dealing with a very small

4   company would be a substantial risk to mitigate. We

5   recognised that in bidding and that risk remained with

6   us, I think, throughout the whole time I was on Pathway.

7   **Q.** I was going to ask you about Escher because we have

8   moved forward in time since the last board minutes. Was

9   there any work that you recall that was done with Escher

10   between these two board meetings to minimise or work

11   together with Escher to minimise that risk?

12   **A.** I can't really pick out the chronology of that, but what

13   I can say is that in mitigating this risk we took,

14   either at this stage or perhaps later, I'm not sure,

15   a number of actions to mitigate this risk, for example

16   one I remember doing, we took their entire source code

17   of their software and put it into escrow account, such

18   that if anything happened to the company we would have

19   access, at least at source code level, to everything

20   they had provided us with.

21   We also -- and I suspect it was probably a bit later

22   than this -- did draw up a comprehensive teaming

23   agreement which spelled out what their responsibilities

24   and ours were and how we should handle it. That was

25   a help.

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1   We also, and I guess it's probably later than this

2   as well, did allocate key staff to go to Boston, which

3   was where Escher was based, to work directly within

4   their team to learn first-hand elements of their

5   software.

6   **Q.** As you have mentioned that can we pull up the next board

7   meeting minute please, which is FUJ00077842, and if we

8   go to page 2 and if we can go to (d) please. This is

9   what you were just mentioning, Mr Bennett, about going

10   and working with Escher in Boston. This is in

11   April 1996, so very close indeed to being awarded the

12   contract.

13   **A.** Yes.

14   **Q.** I'm going to suggest to you that this is quite late to

15   be doing this type of work with a company where it was

16   so important to the delivery of the project.

17   **A.** We had -- our knowledge of Escher wasn't just going to

18   Boston. We had knowledge of Escher through the work and

19   our association with the Irish Post Office, An Post, and

20   one of the key directors of An Post was actually at

21   an early stage, I think, on or attended our board

22   meetings, which were used to supervise the project.

23   So yes, this visit to Escher was, as you say, in

24   April, but we had access to and knowledge of Escher,

25   particularly through An Post, probably -- this is

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1   April 1996, probably -- maybe up to -- certainly well

2   into 1995, so we had access and knowledge of Escher

3   starting in 1995, perhaps even earlier, I can't recall.

4   **Q.** But is that knowledge principally from An Post, as you

5   say?

6   **A.** I'm not sure, but from reading this it sounds very

7   likely that's the case.

8   **Q.** At this stage it is anticipated that the rollout will

9   take place in July 1997; is that right?

10   **A.** Yes. Yes.

11   **Q.** What were the reasons for the delay?

12   **A.** I think in my statement I highlight three areas, all of

13   which contributed to the delay in rollout. The first

14   one, which I referred to, is the difficulties we were

15   having within Pathway in designing and completing our

16   software development. Those problems caused delay and

17   we had to take action to deal with them, so that was one

18   cause of delay.

19   Another cause of delay, which I have already hinted

20   at and referred to, was the fact that this was a PFI

21   contract with a very unclear baseline when the contract

22   was set and those requirements -- there was a phase

23   which I seem to think was called "drop down", which is

24   a bit of an ugly phrase, but it reflected the fact that

25   everyone knew that the contract, although it was let and

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1   was in about four lever arch files thick, was incomplete

2   and drop down was a process defined whereby those

3   missing pieces could be sorted out.

4   In actual fact, they weren't sorted out in the

5   three months allowed for drop down and they -- many of

6   them weren't sorted out even after six months, which was

7   an extension and, as I said earlier, it still left

8   a huge number, or a large number of agreements to agree

9   which continued to be addressed well after the drop

10   down.

11   So the PFI contract -- I think I might say it now,

12   if I don't say it later, I think was totally ill suited

13   to this contract but none of us at the time spotted

14   that. Anyway, PFI itself caused delay as we struggled

15   to understand the design processes and the clear

16   statement of the requirements. We were developing

17   a system and writing software against a moving baseline.

18   And the third issue -- I have developed two -- the

19   third issue was, I think, a recognition that everything

20   Pathway did was equally dependent on large development

21   work taking place both within the two clients. The

22   Benefits Agency had a huge amount of work to do in

23   preparing themselves for their new Benefit Payments

24   System, as indeed did the -- and the Post Office

25   themselves, Post Office Counters had massive development

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1   work as well, and there were dependencies and
2   interdependencies between all three parties.
3   Each of us had to interface with each other, take
4   information from and deliver information to, in order to
5   eventually deliver an end-to-end service. So the delays
6   were of those three components.
7 **Q.** I'm now going to ask you some questions about the
8   Initial Go Live. Could you tell us about the Initial Go
9   Live that happened shortly after the contract was
10   awarded?
11 **A.** Perhaps -- only in, perhaps, outline really. A small
12   number -- and it was a small number -- of post offices
13   were selected to be the first post office to use the new
14   system for benefit payments. As I remember, the first
15   benefit which was available through the new Benefit
16   Payment Card was child benefit.
17   The other benefits were not -- were yet to be
18   developed by BA but, for Initial Go Live, the Child
19   Benefit payment was available and was able to be used in
20   those selected post -- and I think, at some point,
21   something like 40,000 beneficiaries on Child Benefit
22   were able to collect their Child Benefit payments using
23   the Benefit Payment Card through that selected number of
24   post offices.
25   I might not have it absolutely right, but that's the

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1   sort of -- my understanding of what happened in 1990 --
2   I don't know what -- '98, was it?
3 **Q.** 1996. If we could turn up the report that was written
4   by one of your colleagues, FUJ00058278. You can see
5   there in the abstract that, as you have described, it
6   was introducing the benefit payment system into
7   "10 offices in Stroud early".
8   If we could turn to page 8 of that document. Just
9   looking at the first paragraph there:
10   "IGL was implemented as a result of a political
11   imperative from Peter Lilley which called for the
12   introduction of payments of benefit by card, with the
13   deadline of the 23rd September."
14   Do you remember a political imperative?
15 **A.** I remember Peter Lilley coming to Stroud to look at the
16   system. I remember meeting him there and, obviously --
17   I didn't -- whether there is a political imperative, I'm
18   not sure, but I do remember him being there and being
19   very keen on the system.
20 **Q.** Did you feel like you were under pressure to roll out
21   this Initial Go Live quickly?
22 **A.** No.
23 **Q.** What did you think of the Initial Go Live? Was it
24   a useful process?
25 **A.** I think two responses. Yes, it was a useful process but

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1   it was extremely short and extremely small. It was not
2   really real time representative system. It was too
3   limited in scope.
4 **Q.** Was it quite high level?
5 **A.** Well, it paid benefits, which is what it was there to
6   do. So for what it did, it was a proper operational
7   system. It's just that there were very few offices and
8   only one benefit payment. That's the limitation. But
9   within that limitation, it was a true operational
10   system.
11 **Q.** You presented the results of the Initial Go Live at
12   a board meeting on 25 November 1996. Can we get up the
13   document FUJ00077844. If we go on to -- if you scroll
14   to the bottom of that page we can see that you presented
15   a report and if we turn over the page we can see that it
16   says:
17   "Initial Go Live 2 had been successful on
18   21 October, although it took more effort than planned.
19   Mr Bennett confirmed he was likely to sign off the drop
20   down process at the end of the present week."
21   Can you explain how it took more effort than planned
22   or why you would have said that?
23 **A.** No, I can't remember.
24 **Q.** At this stage, did you feel like things were operating
25   well and that you were making good progress with the

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1   Horizon project?
2 **A.** I think this is -- the date of this is -- can you remind
3   me of the date?
4 **Q.** Yes, the date of this is 25 November 1996.
5 **A.** Okay. This is very early in the life of the contract
6   and it was too difficult to judge at that time how
7   things would unfold, so it was an early start but only
8   an early start, and there was an enormous amount still
9   to do.
10 **Q.** I'm now going to pick up again the topic of delays. If
11   we could turn up FUJ00078972. This is a memo that you
12   sent on 7 January to all Pathway staff, and we can see
13   there in the first paragraph:
14   "At the PDA board meeting [that's the Programme
15   Delivery Authority] in December, it was proposed that
16   a joint review should be undertaken between ICL Pathway
17   and the PDA to assess all the remaining risks which must
18   be handled prior to a successful implementation starting
19   with the Live Trial and leading in to National Rollout."
20   If we can scroll down a bit, please. Yes. Up
21   again -- no, there it is:
22   "It is very likely that you will hear views
23   expressed that the programme will be delayed by anything
24   between one to as much as six months. At this stage
25   I must ask you to treat any such views as speculative.

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1   If additional time is considered appropriate, it will be
2   handled through our formal change control process."
3   So, at this stage, you seem to be suggesting that
4   rollout can happen reasonably quickly?
5 **A.** I think there was -- and this letter rather implies it.
6   There was a recognition that, although that was the
7   date, delays were not ruled out. I think at this stage
8   we could begin to anticipate that there would be delays
9   yet to come and be clarified.
10 **Q.** It says "as much as six months". That appears to be the
11   outer limit of what you thought the delay would be at
12   this time?
13 **A.** Well, I think it says here that other people were
14   expressing the view about one to six months. I don't
15   think I was expressing the view of one to six months.
16 **Q.** Quite right. At this stage do you recall how long you
17   might have thought that it was going to take?
18 **A.** No, I didn't have a considered view.
19 **Q.** In February 1997 there was a no fault replan of the
20   programme between the three contracting parties and then
21   in June there was a meeting of the Programme Delivery
22   Authority. If we could pull up POL00028304. Could you
23   explain to us what the Programme Delivery Authority was
24   and how it worked?
25 **A.** Well, I can try. I mean, it goes back to something

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1   I was saying earlier, which is this contract was unusual
2   in having two customers and one supplier. Most of my
3   experience of IT contracts with government were you had
4   one customer and one supplier and you dealt directly
5   between the supplier and the customer in all aspects of
6   the contract and contract delivery.
7   Now, in the case of this PFI contract, that didn't
8   function, so instead -- and this is something which the
9   contract documentation, early on, didn't really specify
10   in any details -- there was a need to create a new
11   organisation called the PDA, which sat above and
12   in-between the supplier and the two customers.
13   So the PDA was a new organisation, staffed from both
14   BA and POCL, and it was put in place to really discharge
15   the contract on behalf of both customers, but in many
16   ways it did actually sit between us and the customer and
17   it got quite large and I think you will -- maybe you
18   will come to this later on -- there were -- but I will
19   mention it now -- there was a major review -- this is
20   1997, it wasn't soon after this, it was a major review,
21   external audit, carried out by the PA Consulting group
22   which I -- which looked at the entire range of project
23   Horizon.
24   And they addressed this issue of the PDA and its
25   size and, I think, echoed some of the comments I have

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1   just made, that it was a large organisation, it was
2   interceding between us as a supplier and the two
3   customers and it didn't have -- and this I think is
4   quite important -- any executive authority, by which
5   I mean it could press ICL Pathway to do things and it
6   could disagree with what we're doing and it could point
7   out the things we hadn't done.
8   But when it came to making decisions about change or
9   things which would affect the so-called sponsors, this
10   case BA -- it always had to revert back to the two
11   customers, so that process of interceding did actually
12   take a lot of time.
13   So if there were critical issues which needed rapid
14   resolution, we might be able to agree to them within
15   ICL Pathway, but PDA could not agree to them itself, it
16   had to revert back to the sponsors. So you will often
17   find, in a lot of the documentations, the "This will be
18   reverted to the sponsors for agreement" and indeed it
19   was but it was a process which took time.
20 **Q.** If we turn you to page 3 of this document, we can see at
21   these PDA meetings you had the opportunity to present
22   reports, or report ICL Pathway issues; is that right?
23 **A.** Sorry, which report is this? This is?
24 **Q.** So you can see there it says "John Bennett reported on
25   ICL Pathway issues".

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1 **A.** This is a PDA board meeting, is it?
2 **Q.** Yes.
3 **A.** Okay, I'm with you.
4 **Q.** Yes, the same document.
5 **A.** Okay, thank you.
6 **Q.** Would that typically happen?
7 **A.** At the PDA board, yes, I think on -- on the PDA board we
8   would always report on progress and issues.
9 **Q.** If we look at the fourth -- 2.4.4 it states:
10   "John Bennett, Paul Rich and Colin Baker NFSP had
11   visited sites in the North East. It was noted that that
12   had been a useful exercise in terms of achieving early
13   exposure of some of the issues needing NFSP decisions."
14   Can you tell us a bit about what that site visit
15   involved?
16 **A.** I don't think that these site visits were ever designed
17   to resolve any issues. I don't recall -- I do recall
18   the meetings. I mean one of the things I was very
19   interested in -- and this is one example of it -- I was
20   very interested in visiting Post Offices around the
21   country. I was keen to meet subpostmasters and their
22   staff and I was very keen to see how they were finding,
23   adopting and using the new system or their enthusiasm
24   for anticipating the new system, so I liked -- I enjoyed
25   and found it very useful to meet and have these visits

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1 and I did request a number of them which were always --
2 and Paul Rich, I recall, often would sponsor and
3 organise these meetings and, as you can see, would
4 attend. So we had a number of these meetings over time,
5 which I found very useful, but I don't believe they were
6 ever designed to deal with any particular specific
7 issue. There might have been feedback and an
8 understanding of how subpostmasters were thinking, but
9 I don't recall they ever led to specific resolution of
10 defined issues.
11 Q. As managing director of Pathway, you wrote a number of
12   monthly progress reports on the development of the
13   Horizon System; is that right?
14 A. Correct.
15 Q. What can you tell us about how those reports were
16   written and drawn together?
17 A. This was something we started quite early in the
18   process, probably after contract I guess, but quite
19   early in the process and I determined that it would be
20   very useful to have a comprehensive monthly report of
21   everything we were doing in Pathway and to construct --
22   and I -- and to construct that report I got every one of
23   my direct reports, obviously, to send me their input.
24   I would consolidate their input and write a management
25   summary.
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1   And that report -- as I think you've got quite a few
2 of them in this bundle -- would often run to 20 or
3 30 pages of information and that report was sent both to
4 my boss, which was the chief executive of ICL, it was
5 shared with all my direct reports and it was also shared
6 with other people who needed it, for example we had
7 a dedicated team from Fujitsu from Tokyo with us, for
8 quite a time, who came to work with us later on in the
9 process and they had a copy of this report.
10   Since it was sent to all my team, it meant that all
11 my team, not only knew what their contribution this last
12 month had been, but they could see quite clearly what
13 the contribution of all their colleagues had been. So
14 I looked upon it as a very important piece of
15 communication and I continued it every month for,
16 I think, quite a few years.
17 Q. Shall we look at one of those reports. If we could pull
18   up FUJ00058162. Thank you. If we could turn to page 4.
19   This is what you were just describing, isn't it, one of
20   these reports?
21 A. Yes, it is indeed.
22 Q. When you were talking about a managing director's
23   summary, this is the bit that you wrote?
24 A. Correct.
25 Q. This report is dated 11 July 1997 and we can see here on
                          130

1 this page, looking at the first paragraph:
2   "This month saw the drawing together of the findings
3 of three separate activities. The first concerned the
4 difficulties in testing of Release 1c, the second review
5 concerned the plans for future Pathway releases in 1998
6 and the third was the output and findings from the
7 programme audit conducted by Mike Coombs and Andrew
8 Boswell across ICL Pathway. This has led a programme
9 review being undertaken and a comprehensive reassessment
10 of the achievable outputs from now through to national
11 rollout."
12   It goes on to say:
13   "The programme review has been presented to PDA,
14 POCL, BA, ITSA and SSA ... The consistent response has
15 been one of disappointment and shock that yet another
16 slippage has come to the surface so soon after two
17 previous replans."
18   So, at this stage in your report, you're reflecting
19 the frustration of the various interested parties; is
20 that right?
21 A. Yes. Everyone was deeply disappointed and affected by
22   these delays.
23 Q. If we could scroll down to the bottom of that page, the
24   final bullet point, it says:
25   "The anticipated delays have caused a serious impact
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1 on the business cases of BA, POCL as well as
2 ICL Pathway. As a result, quite a few people have now
3 voiced their concerns that the programme may not be
4 viable and this has given rise to suggestions of
5 significant contract readjustment as well as exploring
6 the position on termination."
7   Was this a very difficult time to be in your job?
8 A. I think this was a very difficult time for everyone, not
9   just me, but the sponsors and all our staff.
10 Q. If we could turn to page 19 of that document please. If
11   we could scroll down, please, to the "Current Critical
12   Problem". Is it a fair summary that often, if not
13   always, in your report you would summarise each theme
14   and set out a current critical problem?
15 A. I think in the report we -- I had settled on a format
16   which was always followed every month. It was followed
17   both by my summary and I think the format was reflected
18   in all the reports from my management team, so we all
19   had a strict format and this is -- I think that's
20   right -- and this is a part of that format.
21 Q. If we look at the bottom bullet point, we can see that
22   there is a reengineering programme being devised to:
23   "resolve the issues surrounding the EPOS product."
24   Do you see that there?
25 A. Yes, I do.
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1 **Q.** That involves redevelopment work being carried out by
2   Escher.
3 **A.** Mm-hm.
4 **Q.** So, already at this stage in 1997, there are issues with
5   the EPOS product, aren't there?
6 **A.** Yes.
7 **Q.** Was that something that you were acutely aware of and
8   concerned about?
9 **A.** I think the problems with EPOSS started quite early and
10   they continued for a long time. There was a lot of
11   action to resolve and deal with the issues, but they
12   persisted through -- what -- I don't -- what month --
13   this is July -- this is June 1997, isn't it?
14 **Q.** Yes, written in July but dealing with June 1997.
15 **A.** I mean, EPOSS took the attention of my technical team,
16   not just in 1997 but all the way through to 1999 and
17   probably into year 2000. EPOSS was always high on the
18   agenda of things to deal with.
19 **Q.** Is that partly because it was such an important part of
20   the programme itself?
21 **A.** It was a vital part of the programme for Post Office
22   Counters and it was -- and I think I might have
23   mentioned this -- the service, the EPOS Service was
24   an end-to-end service, so it reflected not only what we
25   were doing but it reflected what was happening across
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1   the interfaces with the work done elsewhere,
2   particularly in this case, or later on with Post Office
3   Counters.
4   So it was a complex product. It had extensive
5   end-to-end implications. It involved an awful lot of
6   people and we, in our responsibility, had our own
7   problems in delivering our side of that picture as well.
8 **Q.** If we could turn up a PDA minute. If we could pull up
9   POL00028311. This is another PDA board minute. If we
10   could scroll down, this is, as I say, from August 1997.
11   The first item is:
12   "Mr Bennett to identify how long it will take to
13   obtain all the information required for all post offices
14   and provide a progress update with timescales for
15   collation of full details and resolution of the issues
16   to the next PDA board meeting."
17   So, at the same time that the EPOSS issue is being
18   reengineered, you're also being put under quite a lot of
19   pressure to identify how long it is going to take to get
20   the Horizon project completed, aren't you?
21 **A.** Yes, I mean, this is a different but a major strand of
22   the programme, which is the more practical -- well,
23   I say practical, it's the more physical end of the
24   programme, which is the fact that the software and the
25   equipment associated with it needed to be installed in
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1   either 17,000 or 19,000 post offices. The number
2   I think came down during the period, but even so it was
3   getting on to 20,000 outlets.
4   I have to say on this that the information available
5   to Pathway at the contract stage about the state,
6   physical state, of the Post Office network was very
7   slender, very thin, one might say very thread bare, and
8   it was only -- and we weren't, I think -- and I might
9   have this slightly wrong, but we were not -- not only
10   us, but the other shortlisted suppliers as well -- we
11   were not encouraged or allowed during the sales
12   campaign, during the procurement phase, to see for
13   ourselves what a typical or a range of post offices
14   might actually look like, in reality. That was
15   something which was not to be available until
16   post-contract.
17 **Q.** When you say it wasn't allowed, was it something that
18   you asked to be able to do?
19 **A.** Do you know, I can't remember.
20 **Q.** Are you conscious of anyone asking the Post Office
21   whether they could go and inspect --
22 **A.** Oh, I think so, although I dare say this wasn't the
23   highest thing on our list. We rather took it that the
24   post offices would be suitable for automation and the
25   Post Office Counters themselves would have told us in
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1   advance if they themselves had serious doubts that their
2   estate was not or had defects or difficulties.
3   So we relied, I guess, on any information from the
4   Post Office and took on -- perhaps on trust or however
5   you might describe it -- the view that the network would
6   be in good condition.
7 **Q.** You made assumptions about the network?
8 **A.** I guess we did.
9 **Q.** Shortly after this -- if we could pull up POL00028442 --
10   Peter Crahan on the 24th -- if we could look at page 3
11   please -- wrote to you to give notice of breach of
12   contract. If we could maybe scroll down so that we can
13   see the whole letter, thank you.
14   Were you surprised when you received this?
15 **A.** Sorry, can you just remind me of the date of this
16   letter?
17 **Q.** Yes, it's 24 November 1997.
18 **A.** 1997. Was I surprised at this letter? Probably not.
19 **Q.** Did you see the way that things were going?
20 **A.** Well, I think that everyone was having difficulty and
21   major IT contracts nearly always have difficulties in
22   their early days. Normally, and in most cases, those
23   problems are dealt with but, if they can't be dealt
24   with, then contract cancellation is always an option.
25   So I think, in this case, I certainly couldn't put to
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1 one side that the government would take the option to
2 cancel. It was always an option.
3 Q. Mr Todd's evidence was that you were involved in
4   producing a response to this letter and, if we could
5   pull it up, it's POL00031117. If we could turn to the
6   third page, please. Were you involved in drawing up
7   this position paper?
8 A. I wasn't the author, but yes, I was aware and I inputted
9   to this position paper. I suspect, reading it, it was
10   produced by our legal counsel, the way it's written, but
11   yes, I was involved and I was aware of the content and
12   the thrust of this position paper.
13 Q. What did you understand "without prejudice" to mean?
14   Was that the legal person's drafting?
15 A. One of the -- let me just stand back from that a bit.
16   One of the constant themes in this contract -- it didn't
17   just start with this position paper, it started very
18   early on, which was somewhat disappointing that so much
19   correspondence between the sponsors and Pathway was
20   always headed "Without Prejudice". This is, for me,
21   quite unusual because, in most contracts, or most IT
22   contracts I have been involved with, the contract, once
23   it had been signed, was normally put to one side and
24   everyone worked on delivery.
25   I don't recall in my previous roles ever constantly
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1 having correspondence which is always without prejudice.
2   It was an unusual feature of this contract and this is
3   perhaps another example of it.
4 Q. So the fact that it is headed "Without Prejudice" didn't
5   impact or affect the information that you fed into this
6   document?
7 A. No, it was a constant feature of the contract.
8 Q. If we could turn to page 5, please, and if we could
9   scroll down. This is a long document but I'm only going
10   to take you to some key parts. Further down and, in
11   fact, it's across the page, but this is a section
12   dealing with "The Authorities/PDA".
13   If we could go over -- yes, great, and scroll to the
14   bottom of that page, please.
15   At the bottom of that page, it says:
16   "At the pre-contract stage, had the true role of the
17   PDA been accurately described, Pathway would have
18   reconsidered the commercial terms upon which it entered
19   into the Contract."
20   Do you agree with that?
21 A. Yes, I do.
22 Q. Have you read through this document and is there
23   anything in its contents that you take issue with?
24 A. I have read this document several times and it was the
25   result of a considerable amount of thought and work in
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1 constructing it, and I think, I would say, that this
2   document, within the bundle of documents you have sent
3   me, is one of the more significant documents I would
4   subscribe to.
5 Q. If we could look at page 10 of that document and if we
6   could scroll down. In that first line, it says:
7   "It became apparent during installation work for the
8   first 200 Post Offices that many post offices are not
9   fit for the purpose of installing automation equipment."
10   Was that something you also fed into?
11 A. Well, I think I was talking about that a few minutes
12   ago, so, yes. I mean, what -- just what we did, as soon
13   as we were beginning to draw up our plans for rollout,
14   we made a point of visiting every single one of the
15   19,000 post offices to do our own survey, on the grounds
16   that there were no other survey reports to work from.
17   So within this contract -- I don't know whether we
18   anticipated it at pre-sales time, I suspect we didn't,
19   but, as soon as we started, it was clear that, since we
20   had to install this equipment, we had to do our own
21   surveys. And we did survey every single office to
22   determine did it have the physical attributes to take
23   even the limited computer equipment we provided, did it
24   have sufficient power supplies to drive those devices,
25   did it have the capability to be connected to a network
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1 and how much work, by whom, needed to be done to bring
2   it up to a satisfactory state.
3   That was a job which fell on ICL Pathway to do and
4   we did it for every office.
5 MS KENNEDY: Sir, that might be a convenient moment to take
6   a short break.
7 SIR WYN WILLIAMS: Thank you and what time should we start
8   again?
9 MS KENNEDY: 3.10?
10 SIR WYN WILLIAMS: Certainly, okay.
11 MS KENNEDY: Thank you.
12 (3.00 pm)
13   (Short Break)
14 (3.10 pm)
15 MS KENNEDY: Sir, can you hear me?
16 SIR WYN WILLIAMS: Yes, I can, thank you.
17 MS KENNEDY: Thank you.
18   Picking up where we left off then, if I could bring
19   up a further report that you wrote on 10 July 1998.
20   It's FUJ00058174. Thank you. If we could turn to
21   page 5, please, and if we look at the fourth bullet
22   point down it states:
23   "The main stress point on NR2 testing continues to
24   be with the EPOSS system, testing together with POCL
25   reference data. Resources have been reallocated within
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1   Pathway to bring more effort onto this area and extra
2   skills are being brought in from elsewhere in ICL."
3   If we turn over to page 11, and we're looking
4   halfway down the page, it states -- so towards the
5   bottom of the screen:
6   "The volume of system incidents (PinICLs) is
7   perilously high. Clearance plans are being devised to
8   are all products."
9   If we look to the bottom of that page, it says:
10   "The current architecture for the TIP interface
11   module may not be capable of supporting the entire
12   network. The simulated tests suggest that it cannot
13   harvest the daily transactions generated by EPOSS and
14   send them to POCL in the overnight time slot available."
15   So, as at July 1998, the EPOSS issue is reaching
16   a point where you are needing to deploy extra resources
17   into it; is that right?
18 A. Yes, yes, we did need to put more effort in.
19 Q. Were you being put under pressure to clear PinICLs at
20   that stage?
21 A. The pressure was self generated. There was a clear
22   recognition that there were many more errors than we
23   expected and that these were growing rather than
24   retreating, if I put it that way, and so the effort was
25   doubled down on this system and I think there were --
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1   you may talk about it later. There were a number of
2   technical audits carried out on the development process
3   to try and find a way of bringing our development work
4   of EPOSS more under control.
5 Q. Shortly after this report, you set up a task force,
6   an EPOSS task force; do you remember that?
7 A. I remember it but let me put it this way, personally
8   I don't remember that task force, it was 24 years ago,
9   but if I look at the bundle of documents you sent me
10   I have had a read of that task force report so I'm
11   familiar with it in terms of it within your bundle,
12   although I don't particularly remember it directly
13   myself.
14 Q. The task force at the time would have been reporting to
15   you as the MD; is that right?
16 A. That's not quite right. Let me step back a bit. In
17   Pathway, we conducted every year a range of audits,
18   in-house audits, technical audits and in -- I'm not sure
19   what year this is, is this 1998?
20 Q. 1998.
21 A. Well, in 1998 -- particularly in 1999, which I remember
22   better, we embarked upon probably several technical
23   audits and one technical audit was indeed to do with
24   this task force, looking at the development of EPOSS.
25   This technical audit was produced for my development
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1   director. It was he and his staff who were writing the
2   software and this audit report was produced for him and
3   his team.
4   And if you look at my report, which you have done,
5   you will see it was sent to a lot of people and I indeed
6   was sent a courtesy copy so, in a sense, I was sent
7   a copy of this task force report. But, being an audit
8   report, it was sent to my development director and his
9   boss, which is the overall programme director.
10   Now, the principle in Pathway was that if we had
11   an in-house audit then the process was that when the
12   audit report was completed, all those recommendations
13   would be reviewed by the responsible directors and the
14   corrective actions would be registered, recorded and
15   were placed with owners. And I think you will find
16   that, as far as that task force report was concerned,
17   that's exactly what happened and the corrective actions
18   from that task force report were recorded, owners were
19   placed and there is a record of that in this bundle.
20 Q. We will come back to the eventual report from the EPOSS
21   task force in a moment, but if we could move forward to
22   August 1998 and we could pull up POL00031127. This is
23   a Bird & Bird expert report produced on the BA/POCL
24   payment card programme and if we look at page 4, we can
25   see the purpose of the report and the terms of
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1   reference. So this is at the stage of assessing the
2   strength and weaknesses of the sponsoring authority's
3   case.
4   If we could turn to page 12, please, and scroll
5   down, we can see at paragraph 304 that you are mentioned
6   in the middle of that paragraph. The paragraph reads:
7   "We have not yet conducted a review of the project
8   management of the programme by ICL Pathway, the PDA and
9   the Sponsoring Authorities. Our initial impression is
10   that no formal methods, such as PRINCE, were used.
11   There are well prepared, high level, plans documented in
12   the various versions of the Master Plan and we
13   understand that lower level plans may have been prepared
14   in some areas. The comment by Mr Bennett of ICL Pathway
15   at the PDA Board meeting on 13th August 1996, when
16   Master Plan version 1 was approved, is revealing. The
17   minutes state ... 'Mr Bennett confirmed that ICL Pathway
18   were anxious to progress from drawing up plans to
19   actually using them and were content therefore to sign
20   off this version for that purpose. He did however want
21   it placed on record that the plan quoted dates which
22   were a mixture of agreed baseline, planned targets and
23   hoped for dates and that this weakened the effectiveness
24   of the plan and the process for review'."
25   If we turn over the page and scroll down it says:
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1   "Our impression from the work we have carried out to
2 date is that Mr Bennett's comments of 13th August 1996
3 reflect the weakness in the project management approach
4 taken by ICL Pathway at that time."
5   Do you have any comments on those words in the
6 report?
7 **A.** I've never seen this report before so I don't know its
8 pedigree at all. I do notice that it is August 1996,
9 which is early in the process and I would have -- I was
10 of the view that, certainly around that time, the
11 programme management processes ICL Pathway was adopting
12 were quite extensive, but I think that's probably
13 a better question for my programme director or my
14 development director to answer, so I can't say much more
15 about this report.
16 **Q.** If we then move forward in time to May 1999, you
17 produced an update for the board at that stage, which is
18 at FUJ00117463. Could we turn that up, please. If we
19 look at the top, you have stated:
20   "The ICL proposal submitted in December 1998 has not
21 been progressed or discussed since that date and we have
22 now formally withdrawn it."
23   It then sets out a number of options and, if we
24 scroll down we can see option B1.2 and you set out there
25 the proposal for that suggestion should the BA Benefit
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1 Payment Card be cancelled. So, at this stage, you are
2 already sketching out a plan for if the BA benefit card
3 is cancelled, aren't you?
4 **A.** It looks like it, yes.
5 **Q.** Do you remember this from the time?
6 **A.** Not specifically, but it's -- it sounds quite familiar.
7 **Q.** If we turn to page 7 of that report and we look in the
8 "Programme Status" section, in the middle of that
9 section, it says:
10   "All the 200 post offices running release 1c have
11 been successfully converted to NR2 [New Release 2] which
12 is running well in terms of the day-to-day transaction
13 operations. There are however, major problems with the
14 cash account balancing which takes place on a Wednesday
15 evening and this has been analysed as much more to do
16 with the business processes, business support and the
17 skill knowledge of subpostmasters, rather than
18 structural issue with the Pathway system. Nevertheless,
19 it will require joint effort to straighten out."
20   That's quite a crucial issue that you have
21 identified in that report, isn't it?
22 **A.** Yes, I think it is. I think it begins to draw us to the
23 understanding that the complete delivery of this aspect
24 of EPOSS, which is the critical one to do with the
25 accounts and the balancing of these accounts, required
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1 quite a lot of activity across a wide spectrum. It
2 clearly involved Pathway and what we were doing, but it
3 required -- and it hasn't been -- well, it's referenced
4 a little bit in the document you pulled up a little
5 while ago.
6   It relied, to start with, by very good input to us
7 from the reference data system being developed within
8 POCL and I think, if you look at the correspondence, in
9 order to address these end-to-end issues, we do advise
10 a thorough review of the end-to-end process. I think
11 people probably understand that, to produce accounts in
12 the Post Office, you need to know how much you are
13 charging for individual products being sold. Now, it's
14 a very similar -- I'm not an expert on reference data
15 but, in its simplistic form, we relied on reference data
16 to tell us the status and pricing of every product to be
17 transacted across the counter.
18   And, if you think about it, taking a very simple
19 example, if the Post Office changes the price of, let's
20 say, a First Class stamp -- it sounds very easy and it's
21 probably the simplest product to think about -- what we
22 have to do is to make sure that every single one of the
23 maybe 40,000 counter positions in perhaps 19,000 post
24 offices, uses the new price at exactly the same time and
25 that's just one simple product and, of course, there are
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1 hundreds -- I don't know how many, but there were
2 several hundred products which are marketed through the
3 Post Office network.
4   And to get the accounts right at the end of the day
5 or the end of the week, every single product has to have
6 its exactly right price at the right time and I think it
7 was recognised that -- and this isn't from a Pathway
8 audit, but I think it came out from other audits, that
9 just as much as we had work to do in Pathway, there was
10 a lot to do, to do with the integrity of the reference
11 data information which would impact on the ability to
12 produce good accounts at the end of the week.
13   So that was a factor, but I think overall this
14 paragraph does draw you into the complexity of getting
15 end-to-end EPOSS working at the level everyone wanted.
16 **Q.** You also suggest, don't you though, that the skill
17 knowledge of the subpostmasters was an issue, rather
18 than the structural issue -- there being a structural
19 issue with the Pathway system?
20 **A.** Well, I'm not trying to dodge the issue that we had
21 problems ourselves. We had a lot of problems and you
22 have referred to those earlier but another end of the
23 EPOSS service is, of course, what happens in the post
24 offices themselves and that, I think, takes you into
25 a broader issue, which is to do with the adequacy of the
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1   training for the staff who had to use the system.
2   We were contracted to provide substantial training
3   to staff, both the managers and, indeed, the other staff
4   operating the system, but this was -- has often been
5   referred to as a major management of change programme
6   and whether it was sufficient to rely just on technical
7   training on how to use the system to really cope with
8   the issues of helping 30,000 people with a variety of
9   skills, fears and motivation to use the system well is
10   a big challenge.
11   And I think -- my understanding, my knowledge of the
12   EPOSS system end to end is that parts of it were well
13   used and people liked, which was the daily transactions,
14   the ability to construct -- to register a transaction
15   during the day when dealing with people across the
16   counter, in other words the interaction across the
17   screen. I think that system, from my recollection, was
18   generally well used and well liked.
19   The real weaknesses, which is what you have pointed
20   to, were really to do with the end-of-week accounting
21   process, which proved to be, for many people, very
22   difficult.
23   It was perhaps my understanding -- I admit I might
24   have this wrong -- that the question of balancing had
25   been a big issue well before Pathway introduced EPOSS.

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1   In other words, the paper-based system which pre-dated
2   the Pathway or the POCL system was never an easy system
3   to use at that time and required -- I might have this
4   wrong and I'm perhaps talking outside my knowledge, but
5   I think balancing at the end of the week had never been
6   an easy thing to do.
7 Q. On 14 June 1999 you gave evidence to the House of
8   Commons Select Committee on Trade and Industry. Do you
9   remember that?
10 A. Yes, I do.
11 Q. Your position, is this right, was that you didn't think
12   that there was a technological or technical issue with
13   the system and that this system was extremely robust and
14   applicable?
15 A. If I said that, I must have said it.
16 Q. Shortly after that, the Post Office agreed to accept
17   Horizon on a conditional basis, provided criteria were
18   met. If I could ask you to look at a document from
19   27 September 1999. It is FUJ00079189 and it is page 2,
20   and it says:
21   "I am delighted to confirm the completion of
22   acceptance: the second stage has been successfully
23   finalised by the signing of the second supplemental
24   agreement on 24 September 1999."
25   Did you feel at this time like you had a complete

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1   endorsement of the system and that no further work was
2   required?
3 A. No, but I would pick issue with you about the acceptance
4   being conditional. There was no question of it being
5   conditional. The system was either accepted or it was
6   not accepted. It is true that, once the system was
7   accepted, there were a number of Acceptance Incidents
8   which had to be addressed later on, but acceptance was
9   acceptance, it was not conditional.
10 Q. If we could look at an audit -- you mentioned audits
11   earlier. This audit was carried out on 28 October 1999
12   and it is at FUJ00079782. If you look at that there,
13   you can see this was one of the audit documents you were
14   referring to earlier; is that right?
15 A. Well, this is an audit document. Whether this is --
16   yes, it's an audit document, yes.
17 Q. We can see that you are on the distribution list for
18   this one.
19 A. Am I?
20 Q. John Bennett, distribution.
21 A. Oh, yes, correct, yes.
22 Q. If we could turn to page 19 of this document. Mr Austin
23   was taken to this document earlier, so I don't intend to
24   read it out again, but if you could read it to yourself,
25   Mr Bennett, it's the third paragraph -- well, from the

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1   first paragraph onwards and let me know once you have
2   finished.
3 A. Sorry, from the first paragraph?
4 Q. Yes, from under "Commentary".
5   **(Pause)**
6 A. Right, I have read what's on this screen.
7 Q. Thank you, and if we could turn over the page, thank
8   you. Pausing there:
9   "The figures indicate that the problems facing EPOSS
10   during the Task Force period have not diminished. Of
11   greater concern are the non-EPOSS PinICLs within the
12   group suggesting that there are still serious quality
13   problems in this vital, customer facing element of the
14   system."
15   Then underneath:
16   "The EPOSS Solutions Report made specific
17   recommendations to consider the redesign and rewrite of
18   EPOSS, in part or in whole, to address the then known
19   shortcomings. In light of the continued evidence of
20   poor product quality these recommendations should be
21   reconsidered."
22   So, at this stage, there's the suggestion that EPOSS
23   should be rewritten; isn't that right?
24 A. Correct.
25 Q. This is 28 October 1999.

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1   **A.** Yes.
2   **Q.** So this is very late in the design of the programme,
3   would you accept?
4   **A.** Yes, it is.
5   **Q.** If we could turn to the next document in the series,
6   which is FUJ00079783. This is another development audit
7   and, again, we can see you are on the distribution list
8   and, if we could turn to page 6, again, Mr Austin was
9   taken to this, this morning. Your initials, are they
10   under MTM, "JHB"?
11 **A.** Yes.
12 **Q.** So you were the -- I believe this means the managing --
13   even though Mr Austin was the owner, you were ultimately
14   managing him?
15 **A.** Well, his direct manager was Mike Coombs, MJBC, and Mike
16   Coombs was the technical -- was the programme director
17   working for me, who had technical authority for the
18   programme. So, yes, the development director Terry
19   Austin worked for the programme director Mike Coombs who
20   was a member of my management team. But he was the
21   overall programme director.
22 **Q.** Were you aware of this suggestion or recommendation that
23   EPOSS should have been rewritten or could have been
24   rewritten at this time?
25 **A.** Well, I'm aware of this -- only by reading these

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1   balance through stronger end to end control of the
2   reference data processes."
3   So, at this stage, this issue is causing you still
4   a great deal of concern?
5   **A.** Yes.
6   **Q.** What do you understand in relation to the integrity of
7   accounting data being managed from the end to end basis
8   with Horizon?
9   **A.** Well, I think it's -- well, I'm only interpreting what
10   it says here, that the -- whether there were errors in
11   the accounting data which were being promulgated through
12   the system and could you therefore trust the way the
13   accounting data was being managed. And it does make the
14   point, I think, which I think we talked about a bit
15   earlier, that there's a lot of areas where the integrity
16   can be compromised and there were steps put in place to
17   try and address these.
18 **Q.** Did you feel that you were across or had adequate
19   knowledge of the steps that were going to be taken to
20   get across this and resolve this issue?
21 **A.** Well, I think, as we said earlier, we thought that there
22   was work we had to do with our software. We had a lot
23   of discussion about how the training facilities with
24   Post Office based staff should be improved or augmented
25   and I think it called for a new set of training courses

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1   reports. I have read this report and I think under
2   "Actions" you can see that the view of my -- I don't
3   know, is this the one? Yes, the view of my development
4   director, which it says here at the end:
5   "We will ... continue to monitor the PinICL stack
6   ... and ... re-evaluate this decision. Would [you]
7   please close this issue formally using the rationale
8   described."
9   So that was the assessment of my development
10   director and that was accepted by his boss the programme
11   director.
12 **Q.** So you wouldn't or didn't have input into that decision?
13 **A.** No. It never came to me to make a managing director's
14   decision on this point.
15 **Q.** If we could move forward in time to 20 December 1999.
16   You wrote a further report. If we could pull it up,
17   it's FUJ00058188. If we could turn to page 6, please,
18   and scroll down. It states:
19   "The most serious issue on acceptance resolution
20   concerns AI376 and the integrity of the accounting data
21   being managed from the end to end basis with Horizon.
22   This in turn requires more disciplined and strict
23   accounting integrity controls, some of which can be
24   achieved through the EPOSS reconciliation software and
25   others through process and independent tools and the

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1   to help people with -- I think there's new
2   documentation, as well, for guidance and guides how to
3   use the system.
4   There was plenty of opportunities for user errors in
5   running the end-to-end system, which we thought had to
6   be dealt with. So you had a component in the Post
7   Office themselves with how the staff can be helped to
8   use the system, you have problems in the use of
9   software -- and it's not recorded here, but I know there
10   was an issue concerning how long it took to print-out
11   reports in the post office itself, which was a source of
12   concern -- and then there was, as it says here, stronger
13   end-to-end control of reference data. So there were
14   plenty of steps in this process where improvements could
15   be made, a number of them obviously were with
16   ICL Pathway.
17 **Q.** Did you feel that the programme was fit for purpose when
18   it was rolled out?
19 **A.** At some point, and I'm not quite sure in this
20   documentation where it is recorded, AI376 was deemed to
21   have been handled to such a level that the software was
22   judged suitable to go into live use. So, at some point,
23   yes, this was considered, notwithstanding these
24   weaknesses, the system was judged fit for purpose for
25   live use.

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1 Q. When in 2000 did you leave your role in ICL Pathway?
2 A. Well, I was beginning to withdraw towards the end of
3   1999. I mean, if you look at some of the ICL Pathway
4   board meetings you will see that my successor was in
5   fact attending board meetings in 1999 and I think my
6   last board meeting was either January or February 2000,
7   I'm not absolutely sure.
8 Q. If we could turn up WITN04600104 please. This is
9   a further version of a document that we looked at
10   earlier, dated 10 May 2000, so this may well postdate
11   your departure. But if we could look at page 7 --
12   Next page, I think. Sorry, one moment. Page 9.
13   Yes, over the page.
14   So we have seen all of this before but if we could
15   turn over the page, and you commented on the agreed
16   action before, but this is new. Could you take a moment
17   to familiarise yourself with the "Agreed action" column.
18   (Pause)
19 A. Yes, I have read that.
20 Q. Are you able to help us with what happened between
21   November and May that results in this particular issue
22   being closed?
23 A. No, I can't fill in the gap, but I can notice that you
24   will see that this report was actually sent to my
25   successor, Mike Stares, so he is on the distribution
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1   list for this and you can further see that Mike Coombs,
2   who was the programme director to whom the development
3   director reported, really supported the previous view of
4   my development director that this code should not be
5   redesigned or rewritten at this time. In fact,
6   Mr Coombs makes it more clear in that final paragraph of
7   actions -- let me just have a look:
8   "Effectively as a management team we have accepted
9   the ongoing cost of maintenance rather than the cost of
10   a rewrite."
11   And I think that was the judgement of my programme
12   director and I -- although I wasn't, as you say, on --
13   in post in May 2000, I would have supported his
14   judgement.
15 Q. To your knowledge, were Post Office employees able to
16   review PinICLs?
17 A. Do you know, I'm not sure, but I would have thought they
18   would. We were working very closely with Post Office
19   and AI376, which lies behind an awful lot of this, was
20   actually raised by the Post Office Counters' people so
21   they would have been very much aware of everything going
22   on with end to end EPOSS service, including the closure
23   of AI376. It was their decision to close it.
24 Q. You may have heard the evidence of Mr Oppenheim
25   yesterday. Did you consider that remote access by ICL
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1   and Fujitsu a facility that was so obvious that it
2   didn't need to be set out or explained?
3 A. Sorry, could you repeat the question.
4 Q. So remote access, the ability to access branch data
5   remotely, would you consider that so obvious that it
6   need not be minuted or explained, the ability?
7 A. Well, I was -- I did see that statement elsewhere.
8   I didn't hear the evidence from Mr Oppenheim, but I have
9   seen in one of the reports the suggestion that ICL staff
10   or ICL Pathway staff would somehow have access to
11   transaction data. I found that an amazing allegation or
12   suggestion and, in my view, that was never contemplated
13   or happened. It was never suggested it should happen
14   and I really don't know why and where anyone should
15   think that could have taken place.
16 MS KENNEDY: Mr Bennett, I don't have any further questions
17   for you.
18   Chair, do you have any questions for Mr Bennett?
19 SIR WYN WILLIAMS: No, thank you.
20 MS KENNEDY: If I could pass to Mr Jacobs.
21 MR JACOBS: Thank you. Sir, can you see and hear me?
22 SIR WYN WILLIAMS: As usual, Mr Jacobs, I first hear you and
23   now I see you.
24 MR JACOBS: Thank you, thank you.
25 SIR WYN WILLIAMS: There's always a delay between the two.
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1   Questioned by MR JACOBS
2 MR JACOBS: Yes.
3   Mr Bennett, good afternoon. I have some questions
4   for you on behalf of 153 subpostmasters who are
5   represented by Howe & Co and I want to ask you some
6   questions concerning paragraph 30 of your witness
7   statement, and can I ask that we could just have that on
8   screen. It is WITN04 --
9   Ah, it is here already. Thank you very much,
10   Frankie.
11   So you say:
12   "Throughout the rollout the Post Office had full
13   visibility of ICL Pathway's key activities including all
14   the incident recording and resolution processes."
15   Now, we know, Mr Bennett, from the findings that
16   were made in the High Court, that the Post Office was
17   unable to access audit data or ARQ data, which was held
18   by Pathway and are you aware of what that is, are you
19   familiar with that?
20 A. I'm afraid I'm not. I assume that's information
21   captured at the counter when transactions were
22   processed.
23 Q. Absolutely correct, yes. It's the keypad activities,
24   what keys are pressed --
25 A. Yes.
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1   **Q.** -- when they are pressed by the subpostmasters. It
2   emerged that Post Office had to request that from
3   Pathway and, after a certain amount of requests, then
4   Fujitsu were contractually entitled to charge them for
5   providing that information.
6   I want to ask you about what you say about
7   visibility of Pathway's activities. Are you aware of
8   any other data or key material, which was held by
9   Pathway, which Post Office was unable to access without
10   requesting it of Pathway?
11 **A.** Well, first of all, I don't -- I mean, your original
12   comment about audit data, I didn't realise that this
13   wasn't available to Post Office. It was captured by
14   Pathway because we captured everything which went on, so
15   I could see why people would want access to it, I can
16   understand that. I can't understand why it wasn't
17   available.
18   Taking your second point, can I think of any other
19   areas, well, I dare say someone will find something
20   which we didn't pass on but I would make the general
21   point that, under my direction, most of my staff
22   operated a very transparent process of the work we were
23   doing and the problems we were having and we would share
24   them as appropriate with people who needed them. This
25   was a technical programme to get right and there was no
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1   value in not sharing critical information. So
2   I can't -- I can't think of anything, no.
3   **Q.** That's helpful, and perhaps you might not be able to
4   answer my next question, but I will ask it anyway.
5   You said in your evidence today that you were
6   working very closely with Post Office.
7   **A.** Yes.
8   **Q.** What mechanisms were available for Post Office to access
9   data held by Fujitsu? If they wanted to do so, how
10   would that be done?
11 **A.** Well, I suspect one of the key providers or key conduits
12   for that would be the PDA.
13 **Q.** Right.
14 **A.** Because, I think as we discussed a lot earlier, most of
15   our contact with the Post Office had to be through the
16   PDA.
17   We had very little direct, technical programme
18   contact, directly with the Post Office themselves.
19   I think the PDA was our source of interface.
20 **Q.** Thank you.
21 **A.** I mean, I don't -- I'm quite sure, from time to time, we
22   met with Dave Miller and his people and all sorts of
23   things but, in terms of programme management and
24   programme development, the sponsors were very clear they
25   saw us routing our information, both ways, through the
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1   Programme Development Authority.
2   **Q.** But you're not aware of a specific mechanism?
3   **A.** Not as a mechanism, no.
4   **Q.** Okay, and just for completeness perhaps, you have heard
5   that some information Fujitsu was contractually entitled
6   to charge Post Office for. Were you aware of charges
7   for any other information or data?
8   **A.** In my experience, we charged for virtually nothing for
9   five years on this programme. I mean, one of the big
10   issues for us was that we worked for five years without
11   any payment and our payments didn't start until pretty
12   well the end of 1999.
13 **Q.** Yes.
14 **A.** Even though we started work in 1994 and, in-between 1994
15   and 1999, I would consider the income we would have
16   earned through any charging mechanism to be
17   infinitesimally small.
18 **MR JACOBS:** Well, thank you. I might have some further
19   questions for you but I'm just going to ask those who
20   instruct me if there's anything else that I need to ask
21   you.
22   I don't have anything else for you. Thank you very
23   much.
24 **MS KENNEDY:** Chair, apologies, I understand that Mr Henry
25   may be putting three documents to Mr Bennett, I believe
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1   two of which Mr Bennett has seen but one of which has
2   not been seen and I believe someone should be handing
3   a copy of that now.
4   Unfortunately, one of the documents, which is
5   an organogram, is not on the system and can't be shown
6   on the screen.
7 **MR HENRY:** The organogram is actually POL00089867.
8 **MS KENNEDY:** I'm told it's not with RTS and can't be shown
9   on the screen.
10 **MR HENRY:** Oh, I'm so sorry. That's a shame, because I had
11   quite a number of questions to put on it but not to
12   worry. Let me see.
13   **Questioned by MR HENRY**
14 **MR HENRY:** Mr Bennett, I'm very sorry, what have you got in
15   front of you now? Have you got --
16 **A.** I've got two documents I have seen before --
17 **Q.** Yes, and you've got one page.
18 **A.** -- and I've got a one-page organisation chart.
19 **Q.** What a shame because, although I gave that as
20   a reference, the organogram, on reflection, I would
21   quite like to put about ten pages out of that
22   presentation, which of course you and ICL Pathway gave
23   in a sort of all-day session with POCL on
24   19 November 1996 and you couldn't possibly remember that
25   all-day session, but let's just go to the page you have
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1   got and that shows the accountability hierarchy at
2   ICL Pathway in 1996, doesn't it?
3 **A.** Yes.
4 **Q.** So we have you as managing director, correct?
5 **A.** Correct.
6 **Q.** Then if you're the admiral, your rear admirals or vice
7   admirals are director quality and risk management,
8   Martyn Bennett, correct?
9 **A.** Correct.
10 **Q.** Director of commercial and finance, Tony Oppenheim,
11   okay? So they sit, as it were, to your left and right.
12 **A.** I think that's drawing too much from this chart.
13 **Q.** Really?
14 **A.** I think you should consider all these people as my
15   direct reports.
16 **Q.** So they are your direct reports?
17 **A.** Yes, rather than some form of different -- it doesn't --
18 **Q.** But you are the managing director?
19 **A.** Oh, yes, but I don't know why you refer to these two --
20   I consider them all to be my direct reports, simple as
21   that.
22 **Q.** I see, all right. But you are the managing director?
23 **A.** Correct, yes.
24 **Q.** Oh, yes, quite clearly. Then we have a line, a direct
25   and unbroken line, like a plumb line, down to programme
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1 director Terry Austin, so he was your direct report as
2 well?
3 **A.** Correct.
4 **Q.** Right. Then we have a business development director,
5   Liam Foley, we have customer services director -- is it
6   Stephen Muchow?
7 **A.** Stephen Muchow.
8 **Q.** Muchow, right. I won't -- customer requirements
9   director John Dicks, et cetera, et cetera.
10   Could I just ask you to consider various things and
11   I'm going to make it absolutely plain to you that, if
12   you cannot remember, then you must obviously say so,
13   because the last thing I would want to do is to put you
14   in an invidious position. But let me just ask you about
15   what POCL wanted because you had, up until a very late
16   stage, as it were, two customers, didn't you?
17 **A.** Yes.
18 **Q.** Yes, and the dominant party was the DSS?
19 **A.** As far as I'm concerned, they were joint partners, they
20   were joint customers.
21 **Q.** Really?
22 **A.** They each had their own requirement but they were both
23   equal standing customers.
24 **Q.** But 30 per cent of POCL's revenue came from DSS BA,
25   didn't it? You knew that?
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1 **A.** I -- well, no, I didn't know that.
2 **Q.** I mean, would you not have become familiar with what
3   your client, or one of your clients depended upon?
4 **A.** I was very well aware that Benefits Agency were one of
5   the most important customers POCL had. I didn't know it
6   was 30 per cent.
7 **Q.** You, of course, were present, weren't you, at a meeting
8   which took place on 3 July 1998, correct, with Mr Keith
9   Todd and also Frank Field?
10 **A.** Yes.
11 **Q.** You have that, it's FUJ00075721. Do you recall that
12   Mr Field, the Minister, talked about the Post Office
13   dependency culture and the concern in maintaining the
14   Benefit Payment Card?
15 **A.** Can you refer me to which paragraph?
16 **Q.** Yes, of course. We have a reference to the Benefit
17   Payment Card at 4.5, do you see?
18 **A.** Yes.
19 **Q.** "We spent a lot of time on the benefits of the payment
20   card and not surprisingly picked up this question of
21   part payments. The minister was particularly keen to
22   know that our system was quite capable of handling part
23   payments and that the constraint was essentially a BA
24   rule."
25   Then we considered -- 4.7:
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1   "... some time discussing the wider use of cards
2   across government to connect various government services
3   together."
4 **A.** Yes.
5 **Q.** 4.8:
6   "We discussed the need for the Post Office to move
7   to a more commercial outlook and Keith explained that
8   their difficulty with payment systems was more to do
9   with concern about their funding arrangements and that
10   if the Post Office was block funded then they would
11   probably take a more relaxed and open minded view of how
12   to meet modern payment systems. Frank Field called this
13   the Post Office dependency culture."
14   But then 4.9:
15   "There was no strong reaction to our key comment
16   that the progress to ACT [Automated Cash Transactions]
17   was inevitable but would take time and had to be managed
18   alongside re-engineering of the Post Office network."
19   Now, you were effectively drafting this diary note
20   from that meeting, weren't you?
21 **A.** Yes, I wrote this note.
22 **Q.** Absolutely. So what I'm trying to suggest to you is
23   that that was primarily the concern at that time and, so
24   therefore, the DSS was the dominant partner?
25 **A.** I'm prepared to accept your opinion.
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1   Q.   Could I just ask you, please, to just help me a little
2   bit about Mr Todd's managerial style.
3   So far as you were concerned, you were reporting
4   back to him, were you, candidly and frankly everything
5   that was going on from those who were directly reporting
6   to you?
7   A.   Yes, I was his direct report on this project. It was
8   a bit unusual because most of the business in ICL went
9   through established business divisions. We had a retail
10   division, we had a government division, we had a finance
11   division, et cetera. But this programme was sufficient
12   size and importance that this organisation broke the
13   normal organisation rules. So, rather than reporting
14   through an established line business, which is what we
15   would normally do, I was a direct report to my
16   chief executive.
17 Q.   What about Sir Graham Corbett?
18 A.   Graham Corbett? He was nothing to do with --
19 Q.   The chairman of ICL?
20 A.   Graham Corbett was not the chairman of ICL. You have
21   the wrong man.
22 Q.   Forgive me, I will withdraw that. So you were,
23   therefore, tasked with being the messenger to Mr Todd?
24 A.   I reported to Mr Todd and he was my boss.
25 Q.   Yes.

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1   A.   That's not a --
2   Q.   I didn't mean that pejoratively --
3   A.   Well --
4   Q.   -- but if you had to bring him bad news --
5   A.   I reported everything to Mr Todd.
6   Q.   You reported everything to Mr Todd. Clearly, at that
7   time, sir -- and I note what you say about gradually, as
8   it were, distancing yourself from direct responsibility
9   from about, what do you say, 1999?
10 A.   Well, the end of 1999/early 2000.
11 Q.   Yes, but clearly, at that time -- if we go over the page
12   to page 3 and paragraph 7 -- you were clearly the --
13 A.   Sorry, can we just -- which document -- oh, this is the
14   same document.
15 Q.   Same document, sir, yes.
16 A.   Yes, I've got it?
17 Q.   Paragraph 7 which is on page 3?
18 A.   Page 3, which paragraph?
19 Q.   Paragraph 7.
20 A.   Right, thank you.
21 Q.   This was a list of the action points that arose from
22   that meeting and, clearly, with one exception, you were
23   deputed or, of your own initiative, had to execute the
24   vast majority of those actions, didn't you?
25 A.   Yes.

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1   Q.   So, for example, the draft letter confirming the
2   parallel approach, the sort of compromise approach,
3   correct?
4   A.   Well, all these actions I can see are directed to me to
5   discharge.
6   Q.   Yes, yes, the visit to Feltham, that's not particularly
7   important. You then talking to Derek Sayers for details
8   of the employment services business, so trying to, as it
9   were, capture more business, correct?
10 A.   Yes, that's another aspect of ICL's business.
11 Q.   You to write to Mr Field reconfirming Horizon's
12   capability of handling part payments under the BPC,
13   correct?
14 A.   That's what it says.
15 Q.   Yes:
16   "... to discuss with Terry Reynolds the impending
17   visit of [Mr] Field to ... An Post ..."
18   And family budgeting, in other words his campaign
19   against poverty, you know, to sort of teach people how
20   to manage their own money under the system; would that
21   be right?
22 A.   This is the action.
23 Q.   Yes. Then:
24   "[Mr Todd] to speak urgently to John Roberts to get
25   much more vigour and energy behind the Post Office's

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1   move to financial services."
2   A.   Yes, I think on that I would say that Keith Todd had
3   a very strong view, and he expressed it on many
4   occasions, he thought the Post Office had a huge
5   opportunity in being more dynamic and active in the
6   banking field and he thought that, just as the Post
7   Office network had a huge coverage in the UK, against
8   a climate of high street banks retreating from towns and
9   villages, that this opened up a new business opportunity
10   for Post Office Counters and he was thinking well beyond
11   the BA/POCL contract as to how some of these more
12   visionary services could be used to enhance the network,
13   Post Office network, and provide a better service to the
14   community.
15 Q.   You obviously bought into that vision?
16 A.   We did, indeed, although our focus was delivering the
17   contract, not --
18 Q.   Yes, of course?
19 A.   -- not thinking too far ahead.
20 Q.   But if I could bring you back, therefore, to paragraph 2
21   of that document on page 1, because of course the
22   Minister, his opening remarks were that he was keen to
23   see Mr Todd to talk about social banking, whereas
24   Mr Todd's opening remarks were that he was here to talk
25   about the programme in the round and the key points were

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1   that Horizon is:

2   "deliverable, that it is critical to ICL as well as

3   DSS, POCL and Government and that the infrastructure

4   being built is essential for all aspects of fraud,

5   welfare reform, the future of the Post Office and all

6   aspects of better government."

7   He was going at it not less than 100 per cent,

8   wasn't he, from the beginning of the meeting?

9 **A.** Yes.

10 **Q.** So when you say that you didn't feel under any pressure

11   to deliver, if I ask you --

12 **A.** Sorry, can you just repeat what you say I have said?

13 **Q.** Well, you didn't feel under any great pressure to --

14 **A.** Do what?

15 **Q.** -- deliver the project. You said that earlier.

16 **A.** No, I didn't say that.

17 **Q.** Really?

18 **A.** I said that we were always under -- I'm not sure I would

19   use the word "pressure", but if you run a programme like

20   this you are always energised to get on with the job.

21 **Q.** Yes.

22 **A.** I wouldn't call that somehow unrealistic pressure. If

23   you run a programme like this then you, every day, are

24   working hard to make progress.

25 **Q.** Of course.

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1 **A.** I wouldn't call that pressure, I would call that normal

2   operating.

3 **Q.** Could I ask you -- and I have nearly finished because,

4   obviously, I can't put things to you from a document

5   which you haven't seen and which isn't on the system, so

6   I'm going to abandon that whole tranche. But you appear

7   to say that it was Mr Coombs' decision -- and do correct

8   me if I've got this wrong -- that it wasn't necessary to

9   rewrite the IT; is that right?

10 **A.** No, I think we were talking about rewriting the code for

11   the EPOSS. Redesign and rewrite a part or all of the

12   EPOSS software.

13 **Q.** Exactly, that's what I meant. Are you saying that that

14   was his exclusive responsibility?

15 **A.** He was the technical authority on the programme and

16   I trusted his judgement and his authority was what

17   I followed. His judgement was what carried and

18   I implemented.

19 **Q.** But, ultimately, were you not -- I'm not saying you were

20   ultimately accountable, I will rephrase that. I mean,

21   obviously, ultimately, those above you are ultimately

22   accountable, but you were the managing director, were

23   you properly and fully sighted on that momentous

24   decision?

25 **A.** There were many momentous decisions during the six years

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1   I was managing director of Pathway and I learned, over

2   that time, whose judgement I would follow and who had

3   the authority. Now, Mike Coombs -- if you're talking

4   about Mike Coombs in this case -- was probably the most

5   professional, skilled and experienced man in ICL in

6   programme management and I would not overrule his

7   judgement.

8 **Q.** But surely this is not simply a technical issue?

9 **A.** Isn't it?

10 **Q.** This is a governance issue about: (a) suitability of the

11   programme for your customer; and also (b) as you have

12   alluded to in the answers you have given a short while

13   ago, cost must have played some consideration in this?

14 **A.** I think it was a technical decision, based upon

15   economies and cost, and I think Mr Coombs in the paper

16   we looked at a moment ago explained the two options

17   which were in front of us and the two options were

18   either to continue to manage the system we had

19   developed, with its benefits and drawbacks, or to

20   involve a major rewrite, which, again, had benefits and

21   drawbacks. His judgement, which is well recorded in the

22   papers, was that we were better off managing the system

23   we had and, at that time, that was what was done.

24 **Q.** If you had not chosen to go down that path there would

25   have been further delay, would there not?

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1 **A.** Well, we didn't go down that path, so I couldn't

2   speculate on that.

3 **Q.** Well, obviously, if you were going to -- it's not

4   a question of speculation really, it's a question of

5   common sense. If you weren't going to rewrite that

6   EPOSS issue and EPOSS would have been part of the

7   backbone of the system, wouldn't it? The Electronic

8   Point of Sale Service, it would have been part of the

9   backbone of the system for a subpostmaster in his

10   office?

11 **A.** It was very important to get that decision right.

12 **Q.** It would have been the backbone, wouldn't it?

13 **A.** It was a critical -- it was one of the most critical

14   systems in the Post Office.

15 **Q.** Absolutely. Transaction information processing: again,

16   part of the backbone, correct?

17 **A.** It's a key system.

18 **Q.** Inventory management: part of the backbone?

19 **A.** A key system.

20 **Q.** Yes, so if you were going to rewrite that there would

21   have been delay, wouldn't there?

22 **A.** Well, I think there is clearly pros and cons of either

23   two options, and both --

24 **Q.** I won't ask the question again. I won't ask the

25   question again. I suggest to you it would have been

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1   obvious that there would have been delay.
2   Cost. Obviously, you would have had to have
3   invested more in rewriting, wouldn't you?
4 A. The judgement was that that was not the best option
5   available.
6 Q. Again, I won't ask the question again.
7   Opportunity cost. The cost involved in rewriting
8   would prevent you from utilising staff and resources to
9   work on other projects?
10 A. That's absolutely true. Every decision you take has
11   an opportunity cost.
12 Q. Then, of course, Her Majesty's government might have
13   something to say about this, wouldn't it?
14 A. I can't answer that one.
15 Q. Well, you can because, of course, they had already --
16   and you would have been aware of this -- put you in
17   breach of contract in November 1997.
18 A. We rejected that breach.
19 Q. I'm sorry?
20 A. We rejected that breach.
21 Q. Well, that --
22 A. And that breach was never carried out.
23 Q. Yes, but the position was, wasn't it, as well, that
24   there were -- I mean, I won't go through them in detail
25   but, eventually, you were proposing, and I suggest that

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1   you should have been aware of this if you were dealing
2   with this with Mr Todd, that there was a proposal not to
3   do live testing or to drastically reduce testing of the
4   system. Do you recall that?
5 A. I don't recall a debate about reducing testing, no.
6 Q. Were you aware of a problem, as well, about evidence of
7   ownership of assets involved, such as perpetual licences
8   for intellectual property?
9 A. No, I have not -- that's not a subject I have any
10   recollection of.
11 Q. I mean, if I put something to you (unclear) accept it
12   but, isn't it right that An Post, which was supposed to
13   be, forgive me, the poster boy for a wonderful system,
14   was, in fact, in April 1998, in a massive court case and
15   dispute with no less than Escher over who actually owned
16   the IP?
17 A. I don't remember that at all but I take your word for
18   it.
19 Q. Well, because I want -- final this: when you say that
20   you, in fact, put the source code into escrow in case
21   anything might have happened, and you said that earlier
22   this afternoon --
23 A. Yes.
24 Q. -- you must have had a memory of why that was?
25 A. We put it there because we saw the risk of a small

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1   company not being in business during the life of this
2   contract.
3 Q. Forgive me, sir, were Escher aware that you put their
4   source code into escrow?
5 A. They certainly were.
6 Q. Were you aware --
7 A. We had -- I mean -- sorry, I don't mean to interrupt,
8   but we couldn't put their source code into escrow unless
9   they gave it to us.
10 Q. Thank you, because obviously then -- I mean, weren't
11   they supposed to be bought out by Andersen Consulting?
12 A. I don't remember that.
13 MR HENRY: You don't remember that. Well, thank you very
14   much for answering my questions.
15 SIR WYN WILLIAMS: Is there anyone else who is intending to
16   ask any questions?
17 MS PATRICK: Yes, sir, Ms Patrick.
18   Questioned by MS PATRICK
19 MS PATRICK: Mr Bennett, my name is Ms Patrick. I ask
20   questions for 64 subpostmasters and I'm instructed with
21   Mr Maloney KC, who sits beside me, by Hudgells
22   Solicitors.
23   I only have a few questions for you, following up on
24   two points that Mr Henry was raising with you, a visit
25   to Feltham, but instead of looking backwards, I may be

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1   looking forwards, as it were.
2   The potential for the future commercial exploitation
3   of Horizon was important, both for ICL and for POCL?
4 A. Yes.
5 Q. But first Horizon had to work and be seen to work?
6 A. Yes.
7 Q. Can we look, just to perhaps refresh your memory, at how
8   you closed out 1999 in your end of year communication to
9   the ICL staff. I think you have seen this document but
10   we can bring it up at FUJ00075736, and it is the first
11   page.
12   On the left-hand column -- you see there are two
13   columns to the document and I'm looking at the second
14   paragraph on the first column to start with and I'm
15   going to start a little of the way down, maybe about
16   a third of the way down the paragraph, you will see
17   there's "There":
18   "There are still some important issues which we are
19   working on with the Post Office but we plan to restart
20   rollout on 24th January 2000 at which time we will
21   rapidly reach the rate of 300 post offices per week,
22   completing as planned in spring 2001. Meeting these
23   dates is just as important to the Post Office as to us,
24   since they are keen to get started on the exploitation
25   opportunities, which Horizon provides. The next major

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1   new activity for both parties will be around banking
2   services. Work here will accelerate rapidly through
3   2000."
4   Now, I'm going to skip ahead a little and, if we
5   look over to the second column at the top, it is visible
6   on screen:
7   "We have recently hosted, here in Feltham, Alan
8   Johnson MP, Minister of State at the DTI, responsible
9   for the Post Office. Like many of his colleagues, he
10   found the session an excellent introduction to the
11   project. We have also been very fortunate to have
12   visits from the Parliamentary IT Committee and the
13   Performance & Innovations Unit from HM Treasury during
14   November. Those attending were particularly excited by
15   the impact that this project can have on the way that
16   government services are delivered in the future,
17   exploiting the natural strengths of the Post Office
18   network."
19   It goes on:
20   "2000 will be a challenging and exciting year for us
21   all and I thank you all in advance for all your efforts
22   and wish you and your family a Happy Christmas and
23   New Year."
24   You see it is signed off there at the bottom by you;
25   is that correct?

<center>181</center>

1   Now, POCL and ICL, and the government, were
2   particularly excited by the future commercial
3   exploitation of Horizon, weren't they?
4 **A.** I'm sorry, I didn't -- I have seen this. Could you just
5   repeat the question?
6 **Q.** So we have seen what you said at the end of
7   December 1999 to your staff. POCL, ICL and the
8   government were particularly excited by the future
9   commercial exploitation of Horizon, weren't they?
10 **A.** I believe so, yes.
11 **Q.** Now, looking at that, we have seen the meetings that
12   were going on with ministers and Parliamentarians to
13   explain the system. Did those meetings include
14   an update on just how many receipts and payments
15   imbalances had occurred in 1999?
16 **A.** Are you quoting from a document or is that --
17 **Q.** No, I'm just asking you a question.
18 **A.** I see, yes.
19 **Q.** You were involved in those meetings, you knew they had
20   happened. In those meetings with ministers and with
21   Parliamentarians to explain the system, did those
22   meetings include an update on how many receipts and
23   payments imbalances had occurred in 1999.
24 **A.** I'm sorry, maybe my hearing is bad but I don't quite --
25   could you just.

<center>182</center>

1 **Q.** When the MPs -- sorry, it has been a long day,
2   Mr Bennett. I will go really slowly.
3   When you had those meetings --
4 **A.** Yes.
5 **Q.** -- with MPs --
6 **A.** Yes.
7 **Q.** -- and with ministers to explain the system --
8 **A.** Yes.
9 **Q.** -- did they include an update for them on how many
10   receipts and payment imbalances had occurred in 1999?
11 **A.** I -- I do recall that element, no. I don't -- I doubt
12   whether that was discussed. I mean I think the main
13   purpose was to show them an example of how the system
14   worked and raise their sight as to how it could be
15   utilised in the future. I don't think we discussed any
16   particular issues or programme activities which were of
17   the subject you have just raised, so I doubt whether we
18   did discuss that.
19 **Q.** Thank you, Mr Bennett.
20   Our last point: did the meetings involve
21   an explanation of the continuing recommendation from
22   some within ICL that the EPOSS required a redesign or
23   a rewrite?
24 **A.** It wouldn't have been discussed in those meetings, no.
25 **MS PATRICK:** Thank you, Mr Bennett. That's all the

<center>183</center>

1   questions we have.
2 **MS KENNEDY:** Chair, I --
3 **SIR WYN WILLIAMS:** Mr Bennett -- Ms Kennedy, there's one
4   aspect of Mr Bennett's evidence that I think may require
5   a little further clarification and that relates to the
6   questions you asked him about the potential for remote
7   access -- I use that phrase as a very shorthand
8   phrase -- and what's concerning me is that I haven't got
9   before me the transcript of Mr Oppenheim's evidence
10   yesterday, which was similar to Mr Bennett's evidence in
11   the sense that he didn't think that remote access in the
12   strict sense could be achieved, but he did give quite
13   a detailed account of how use of the central servers
14   might have an effect on branch accounts, which ought, if
15   the system was operating properly, to have been flagged
16   up in the data produced.
17   Now, I'm loath to ask Mr Bennett questions about
18   that without having precisely what Mr Oppenheim said
19   before me so that I can quote him accurately to see
20   whether the two of them agree or disagree about this
21   because, as you will know, in the civil litigation there
22   appeared to be an acceptance that remote access -- and
23   I use that again somewhat loosely -- was not just
24   a possibility, it occurred.
25   So, as it seems to me, there is this area of

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1 evidence which may need to be clarified and I'm saying
2 all this publicly because I'm contemplating asking
3 Mr Bennett to make a short supplementary statement, once
4 we have a transcript of Mr Oppenheim's evidence, so that
5 he can say whether or not he agrees with it.
6   That's a very long-winded statement by me, but
7 I wanted to make it public to everyone because I don't
8 want this aspect of the case to be left up in the air,
9 so to speak, with different nuances and different
10 accounts from different witnesses, unless ultimately
11 that is the state of the evidence, so to speak.
12   There we are. It's not a question to you,
13 Mr Bennett, but it is, now that I have said what I have
14 said, raising the possibility that at some stage the
15 Inquiry might write you a letter with an extract from
16 Mr Oppenheim's evidence and ask you to comment on it.
17 You understand that?
18 A. Yes.
19 SIR WYN WILLIAMS: Yes, thank you. So that's it for this
20 afternoon, Mr Bennett, and I would like to thank you for
21 making your written statement and coming into the
22 Inquiry to give oral evidence.
23 A. Thank you.
24 SIR WYN WILLIAMS: So one witness tomorrow, Ms Kennedy?
25 MS KENNEDY: Yes, Mr Miller.

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1 SIR WYN WILLIAMS: Can we use that well-known legal phrase
2 "not before 10 o'clock", just in case my train is late
3 tomorrow?
4 MS KENNEDY: Yes, thank you.
5 SIR WYN WILLIAMS: All right, fine.
6 (4.27 pm)
7   (The Inquiry adjourned until 10.00 am on Friday,
8   28 October 2022)
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