

Witness Name: Michael Coombs

Statement No.: WITN0387_01

Exhibits: WITN0387_01/1 to WITN0387_01/23

Dated: 9 September 2022

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF *MICHAEL JOHN BARTON COOMBS*

I, *MR MICHAEL JOHN BARTON COOMBS*, will say as follows:

INTRODUCTION

1. I am currently retired, and have been since June 2002. My retirement followed a period of medical leave from work that commenced in April 2001. I was formerly employed by the International Computers Limited (“**ICL**”) group. My last professional role was as Programme Director of the Horizon project (the “**Programme**”) at ICL Pathway Limited (“**ICL Pathway**”), a position that I held between around September 1997 and April 2001. I am not involved in the Programme at present, and have had no involvement in it since April 2001.
2. This witness statement is made to assist the Post Office Horizon IT Inquiry (the “**Inquiry**”) with the matters set out in the Rule 9 Request provided to me on 8 June 2022 and the supplementary questions provided to me on 2 September 2022 (the “**Request**”). It is based on my direct knowledge of relevant matters.

3. The topics set out in the Inquiry's Request relate to events that took place more than 21 years ago. I have tried to remember them as best as I can. However, the length of time that has passed since the relevant events, compounded by my ongoing health difficulties (about which I provide further detail below), make it difficult for me to recall the relevant events completely or accurately.
4. In this statement, I have addressed, in particular, my involvement in the Programme up to and including the rollout of New Release 2, and my general reflections on the Programme.
5. I also address my current and previous health issues, in particular at paragraphs 11 to 15, as these have impacted my recollections and this statement.
6. The Inquiry has referred me to a number of documents in the Request. Where these documents are relevant to my recollections or have assisted me in my recollections, I have referred to them below using references WITN0387_01/1 to WITN0387_01/23. The documents are also listed in the index accompanying this statement.

BACKGROUND

7. I completed an engineering degree at the University of Leicester in the summer of 1969. In October 1969, I joined the ICL group in a graduate role. I remained employed by the ICL group for the remainder of my career.
8. During the course of my career, I worked on a range of IT projects including internal ICL projects and computerisation projects for public bodies. While I had an engineering degree, I did not work in technical roles at ICL. Throughout my

career, I was involved in the management side of projects rather than the technical side.

9. I initially became involved in the Programme in 1995, during the bid phase. At the time, I was working in ICL's development division in Manchester, which was not involved with the Horizon bid. However, as I had previous experience on a similar computerisation project for the UK Inland Revenue (as it was then known), I was asked to consult with the bid team as they prepared the Horizon bid. My role was discrete, and included consulting on specific queries raised by the bid team and potentially drafting certain aspects of the bid document. For example, I recall assisting with aspects relating to the rollout of terminals to Post Office branches (as I had experience with a similar process on the previous project for the Inland Revenue). I recall working with John Bennett and Liam Foley, as well as others whose names I do not remember. I do not recall any further details of the assistance I provided. Following the success of the Horizon bid, I did not remain involved in the Programme.
10. Around the spring of 1997, while I was based in Manchester and working on a project unrelated to Horizon, I was asked to lead a review of the Programme by John Bennett, who was the Managing Director of ICL Pathway at the time, and Keith Todd, who was the Managing Director of the ICL group. I recall there were concerns about the progress of the Programme and an independent review was thought to be necessary. Specifically, I believe the Programme was experiencing difficulties baselining the Horizon software and so progress was slower than it should have been. This also meant the release was not coming together to enable testing on time. I led a review, as requested, and recall

finding that there was considerable slip in the Programme timeline and that there were various organisational issues. I do not, however, remember the details of my findings. I remember presenting my findings to ICL Pathway management and representatives of the customers around September 1997. Following this presentation, I was asked to join the Programme as Programme Director to address the issues.

11. Around March or April 1999, I suffered an atrial fibrillation incident. As a result of this incident, I was hospitalised for around ten days. After being discharged from hospital, I remained on medical leave from work until around June 1999. When I returned to work, I was initially placed on lighter duties for several months and I was also deliberately trying to pace myself to avoid particularly stressful situations. As a result, I am not able to assist the Inquiry in relation to events that took place while I was away from work, and there may, generally, be some gaps in my memory in relation to events in 1999.
12. On 6 April 2001, I suffered a major stroke. As a result, I was admitted to hospital for about 6 weeks. This stroke had significant repercussions for my physical, mental and emotional health. In particular, it caused a number of serious conditions, including the following, which continue to affect me today:
 - 12.1. Memory loss, including an inability to recall almost anything that occurred for several months prior to the stroke.
 - 12.2. Difficulties with speech and communication

13. As a result of this stroke, and the conditions it caused, I came to the conclusion that I would not be able to return to work, and took an early retirement in June 2002.
14. In 2008, I suffered a second stroke. As a result, I was admitted to hospital for about 4 days. The effects of this stroke were relatively minor compared to the one I suffered in April 2001.
15. While there have been improvements to my health since my first stroke in 2001, my memory remains limited. I struggle to recall events that took place a long time ago. I also have difficulties with my short term memory and, at times, can struggle to recall events that took place very recently. Where I am able to recall events or occurrences, my memories may be general, incomplete, or not entirely accurate. While the Inquiry has referred me to various documents in the Request, and on occasion these have assisted my memory, I often do not recall the specific matters or incidents mentioned in these documents.
16. Notwithstanding these difficulties, I have tried my best to recall relevant events from my involvement in the Programme that are responsive to the Inquiry's questions, as contained in the Request.

MY ROLE AS HORIZON PROGRAMME DIRECTOR

17. My role as Programme Director was to take a cross-programme or matrix view of the programme elements of the Programme. For example, I tracked issues as they arose in the technical teams and then worked with those teams to identify the right actions to resolve them. I was also involved in governance, which included setting up organisational structures for the Programme such as committees or forums and attending those meetings.

18. Having reviewed the letter to Peter Crahan from Dave Miller dated 30 June 1998 (WITN0387_01/1), I recall attending the Horizon Programme Board and, depending on the topics to be discussed and their relevance to me, the Horizon Delivery Group. I also recall being involved in setting up the forum referred to at paragraph 4.7 of the document. The purpose of this forum was to bring together people working on both the programme and the commercials to deal with those issues. One of the challenges I encountered on the Programme was commercial issues often bumping into programme issues. While I do not recall the specific issues that arose, the matters set out in the letter to Dave Miller from Tony Oppenheim dated 18 September 1998 (WITN0387_01/2) are familiar and are likely to represent the issues at the time.
19. My role did not require me to have a detailed knowledge of the technical aspects of the Horizon system (such as software development or testing). My role was primarily a project management one, which was consistent with my previous experience at ICL (as noted at paragraph 8 above).
20. As Programme Director, my role was quite autonomous. I generally reported to John Bennett. I also had occasional communication with Keith Todd. Post Office Counters Limited (“**POCL**”) also put in place someone to carry out a similar role to me. This was Dave Miller, who was, effectively, my POCL counterpart.

RISKS ASSOCIATED WITH THE PROGRAMME

21. My recollection of the risks has been somewhat assisted by reviewing the letter from Bruce McNiven to myself dated 21 May 1998 (WITN0387_01/3) and the

Horizon Programme Board Report dated 16 June 1998 (WITN0387_01/4) (Annex D, in particular). I recall a number of risks to the Programme:

21.1. Delivering the Programme to schedule. During and prior to the rollout of New Release 2, there were challenges delivering the Programme on time. In general on the Programme, there was a lot of work to be done and the timescales were usually very tight.

21.2. Training of subpostmasters to use the system. I recall a lot of concern around how subpostmasters would be trained to use the system effectively, and that this might be a risk for rollout and the success of the Programme. My recollection is that John Dicks had responsibility for defining training. There was discussion around whether ICL should directly train end-users or whether it would train “trainers” who would subsequently train the end-users. Both these options had different dynamics in terms of resourcing and staffing, but I believe it was concluded that ICL Pathway should train the trainers, as this would better meet the volume of training required. There was also concern around the ability of subpostmasters to use new technology, as many of them were older and not used to working with IT.

21.3. The role of the Benefits Agency (“BA”). I recall there being a concern that BA was not fully committed to the Programme. In particular, while work on New Release 2 was ongoing, BA was finalising their CAPS programme and wanted fewer updates in each release of Horizon. This had had a direct impact on ICL Pathway as it meant an increased number of releases.

RESOURCING OF THE PROGRAMME

22. While I was Programme Director, I thought the Programme was generally appropriately resourced.
23. As Programme Director, I used to sponsor requests to the Change Control Board, and these included resource related requests. While I do not recall any specific request, such requests were not generally turned down. My impression was that ICL Pathway was prepared to spend the necessary money, including to recruit the right people, where necessary to advance the Programme.
24. In terms of expertise, I recall that a large number of those working on the Programme (including myself) were drawn from the previous computerisation project for the Inland Revenue (which was regarded as a success at the time). ICL Pathway was pulling people from previous similar projects into the Programme for their expertise. However, I should clarify that I was not directly involved in most recruitment. The directors of each team would have been responsible for their own staff, with support from the personnel department.
25. I do recall there were times where there were resourcing shortfalls – for instance when we had difficulties recruiting sufficient staff, which is mentioned at paragraph 4.5 of the Monthly Progress Report for June 1997 (WITN0387_01/5). However, I do not recall this being a consistent issue and, in my experience, it is to be expected that a project will not always be fully resourced at all times.
26. I have specifically considered the Report on Release 2 Process Improvement Programme (WITN0387_01/6), which reports on improvements to be made to the deployment of processes/standards and compliance with them by the

Programme team, in response to a report by PA Consulting. While I expect there would have been non-compliance with standards, and this was correctly being addressed, this document has not assisted me in recalling issues with resourcing at the time.

ISSUES IN THE DEVELOPMENT AND TESTING OF SOFTWARE, AND DELAYS TO THE PROGRAMME IN 1997 TO 1998

27. As I noted above at paragraphs 8 and 17, my role on the Programme did not require me to know details about the technical issues that had arisen in software development or testing. I provided a cross-programme or matrix view of the programme elements of the Programme. In light of this, I am not able to recall the specific issues that arose during software development and testing. I generally recall attending meetings where I may have discussed, at an aggregate level, the number of open PinICLs or Known Problem Register entries at the time, and their impact on meeting Programme targets. However, I would not generally have been aware of the specific technical issue that was causing the problem raised by a given PinICL.

28. I note, for instance, that the BA/POCL Programme Delivery Authority Board Minutes dated 23 September 1997 (WITN0387_01/7) indicate that there were a significant number of open Category 1 PinICLs relating to security, accounting and reconciliation, and the BA/POCL Programme Delivery Authority Board Minutes dated 21 August 1997 (WITN0387_01/8) also refers to security issues. While I do not recall all the categories of PinICLs, I do recall that category 1 PinICLs were the most serious. However, I am unable to recall the specific issues these documents relate to.

29. Version 1 of the 100 Trial Surveys Report (“**Trial Surveys Report**”) (WITN0387_01/9) assisted me to recall that there were initially issues with the rollout of hardware to Post Office branches, because the installation of new hardware sometimes required subpostmasters to reorganise their counters or ways of working. While I do not recall the issue in detail, the Trial Surveys Report (WITN0387_01/9) suggests they were being considered and dealt with.
30. I was not directly involved in the financial aspects of the Programme (apart from managing an internal budget on the Programme), and so I am unable to comment on how issues encountered during the Programme affected the Programme’s finances.

THE TREASURY REVIEW

31. I have reviewed the ICL Pathway Memorandum on 'Questions Raised at Treasury Review Panel Presentation' (“**ICL Pathway Treasury Review Memorandum**”) (WITN0387_01/10), the ICL Pathway Diary Note on the banking meeting with Frank Field (WITN0387_01/11), and the minutes of the meeting between ICL and George McCorkell (BA) dated August 1998 (WITN0387_01/12) in considering the Inquiry’s questions about the Treasury Review.
32. I recall having very limited involvement with the Treasury Review, and I struggle to recall what its purpose or objective was. Certain documents about the Treasury Review were circulated to me (including the documents mentioned at paragraph 31 above), but I do not recall having any formal involvement with the Treasury Review. As a result, I am not in a position to comment on the

effectiveness of the Treasury Review generally, or in scrutinising the technical integrity and robustness of Horizon.

33. In reviewing WITN0387_01/10, I was, however, prompted to recollect that the Treasury Review had an interest in “uncarded casual agents”, which was a very difficult problem for ICL Pathway and the Horizon system to resolve. “Uncarded casual agents” referred to people who did not themselves hold a Benefits Payment Card and also had no direct relationship with BA (someone who is picking up benefits on another person’s behalf).
34. I also recall briefly meeting Frank Field, a Labour MP at the time, as part of a group of individuals from ICL Pathway. I do not recall when this meeting was or what its purpose was. I do not believe it was related to the meeting that is minuted at WITN0387_01/11.

NEGOTIATIONS OVER HORIZON AND ACCEPTANCE CRITERIA IN LATE 1998

Negotiations over Horizon’s future in November–December 1998

35. I recall being aware that there were discussions between ICL Pathway, BA and POCL, concerning the future of the Programme in late 1998. As Programme Director, I would have been involved in at least some of these discussions, however I cannot recall what was discussed or my contribution to the discussions. I do recall having the impression that BA was not interested in the Programme, however I cannot say whether this was during November and December 1998 or in 1999.

Agreement between POCL and BA over Horizon’s future

36. I do not recall being involved in discussions regarding the level of agreement between POCL and BA concerning the future of Horizon. My role was

concerned with the work that was occurring across the Programme and focussed with getting the Horizon platform back on track.

Changes to acceptance criteria in November–December 1998

37. Despite reviewing documents referenced by the Inquiry in the Request that set out the changes ICL Pathway proposed in relation to the acceptance criteria for Horizon in November and December 1998, I cannot recall what the specific proposed changes were, or the reasons for them.

38. Having reviewed the ‘Horizon Replan Status Report’ dated 18 November 1998 (“**Replan Status Report**”) (WITN0387_01/13) and the letter from Dave Miller (my equivalent at POCL) to me dated 10 December 1998 regarding ‘Acceptance’ (WITN0387_01/14), I can recall that as we went forward with the Programme, there were discussions about the definition of acceptance and who had the right to decide acceptance as there were three parties involved (i.e., POCL, BA and ICL Pathway). I would have been involved in some of these discussions as I attended various Programme meetings at the time, however I cannot recall what was discussed or if the discussions took place in November and December 1998.

39. I expect that John Dicks, as head of the customer requirements group at ICL Pathway at the time, would have been largely responsible for managing proposed changes to the acceptance criteria and the discussions with POCL and BA. I might have been consulted on the proposed changes, but I cannot recall.

ISSUES IDENTIFIED IN 1999, BA’S WITHDRAWAL AND TRAINING

Issues identified during development and testing in 1999

40. I recall having a discussion with Dave Miller about POCL's back office having difficulties with Horizon following accounting and reconciliation testing. However, my recollection of this meeting was prompted by the Replan Status Report, and I cannot recall whether the discussion took place in late 1998 or 1999, and I cannot recall any further details.
41. Beyond the issue mentioned at paragraph 40, I cannot recall specific issues that were identified during development and testing of Horizon in 1999. Testing and development were not in my area.
42. I would have likely attended meetings and reviewed reports where such issues would have been discussed. For example, I would have received monthly reports (for example, the Monthly Joint Implementation Report dated April 1999 to May 1999 (WITN0387_01/15) and the ICL Monthly Progress Report dated November 1999 (WITN0387_01/16)), and I would have received test reports (for example, the Release 2 Model Office Rehearsal 3 Closure Report (WITN0387_01/17)).
43. If there were specific issues that were particularly significant (for example, where the issue risked delaying rollout or the next release of software) and required work across more than one Programme team, I would have followed up on the issue or assigned the follow-up to the appropriate manager. Otherwise, I would have received high-level summaries of the issues that had been identified and resolved, and I would not have been involved in the detail.

The withdrawal of BA and its impact

44. I cannot recall the reasons for BA's withdrawal from the Programme, nor its financial impact. Contractual and financial matters were not my area of

responsibility, which would have fallen to others within ICL Pathway, including the Commercial and Finance Director. As Programme Director, I may have been consulted in relation to specific issues relating to BA's withdrawal, particularly where such issues required cross-programme considerations, however I cannot recall any issues.

45. My impression at the time was that BA did not want the Benefits Payment Card, as it took the department in a direction that it did not want to go – BA did not want their services to be tied to POCL counters.

46. ICL Pathway managed the impact of the cancellation of the Benefits Payment Card, including any changes that were made to Horizon as a result. I recall that software code and certain products were removed from Horizon, and one or more cycles of testing were completed, but nothing further. The testing may have included a further Model Office Test. I do not recall being made aware of any adverse impacts on the quality of the Horizon software being developed at that time.

Issues relating to the provision of training

47. I recall being partially involved in the provision of training relating to Horizon, but I was not involved in running the training directly. Initially, there was rollout training provided by ICL Pathway to POCL staff and others so that they could train end users of Horizon ('training the trainers') and training support staff operating the helpdesk, which followed.

48. Training was key to the rollout due to the large number of Post Office branches involved and the speed of the rollout. I recall having a discussion regarding a key issue relating to training, which was prompted by my review of the letter

from John Dicks to Bruce McNiven dated 11 August 1999 (WITN0387_01/18). I believe my discussion was with John Dicks, and it was about POCL asking ICL Pathway to provide more training for Horizon, and our view that POCL had already asked for a lot of training, which ICL Pathway had delivered, and that the remaining issues related to how POCL was managing change within its business. I do not recall any further details.

ROLLOUT

Assessing Horizon's performance during rollout

49. I recall that ICL Pathway and POCL were monitoring Horizon's performance jointly during rollout, and we reacted as best we could to issues as they arose, however I cannot recall any specific issues.
50. Reviews were undertaken during rollout, and I can recall at least one review being undertaken by PA Consulting and a joint review between POCL and ICL Pathway relating to rollout, however I cannot recall or describe what was done. I would have been involved in audits undertaken during rollout, including 'Mid Stage Quality Audits', and would have been involved in the corrective actions that were taken as a result of audit findings (see, for example, the Schedule of Corrective Actions – NR2 Mid Stage Audits (Consolidated) dated 4 May 2000 (WITN0387_01/19)).

THE TECHNICAL INTEGRITY AND ROBUSTNESS OF HORIZON AT VARIOUS STAGES

51. In the Request, the Inquiry has asked several questions as to my understanding, opinion and/or assessment of the technical integrity and robustness of Horizon at various stages in the period 1998 to 2002. These

stages are at the time of the Treasury Review, November and December 1998, during development and testing in 1999, prior to acceptance, and during rollout. I have also been asked to specifically consider the Electronic Point of Sale System (“**EPOSS**”) PinICL Task Force and proposals from 1999 to re-design/re-write the EPOSS code.

52. My main recollection about technical integrity and robustness generally is that, at the point of acceptance, the relevant Programme teams at POCL and ICL Pathway understood that Horizon was robust based on the process that had been followed, including Model Office Tests. This did not mean that the software did not have any bugs or issues that needed to be resolved, however, we were working with POCL to achieve acceptance, and there was a concerted joint effort.
53. I do not have any recollections about the EPOSS PinICL Task Force, including in relation to the reasons for its establishment, its findings or how its findings may have been communicated to POCL. I reviewed, in particular, the Report on EPOSS PinICL Task Force dated 14 May 2001 (WITN0387_01/20), but this has not improved my memory about the task force. Having considered that document, I expect that I would likely have been aware of the EPOSS PinICL task force while I was Programme Director, as one team out of many working on EPOSS issues. However, I do not recall having direct involvement in their work. I considered, in particular, section 7.3 of the document regarding issues with the EPOSS code. While I recall, generally, that there were problems with the EPOSS code, I do not recall the specific concerns the task force raised or whether these were communicated to POCL.

54. I do not recall reviewing WITN0387_01/20 or any earlier drafts of it during my involvement with the Programme. I note that I am not listed as an author of the document or on its distribution. In addition, the report is dated 14 May 2001, which was after my first stroke and when I was no longer working.
55. I recall that, prior to roll-out, there were a lot of faults with EPOSS (though I do not remember details of specific faults). There were discussions about whether it was preferable to redevelop EPOSS (including rewriting its code) or to make quality improvements to the existing system.
56. Having reviewed the CSR+ Development Audit dated 28 October 1999 (WITN0387_01/21), I understand that a recommendation was made in an EPOSS Solutions Report dated 21 September 1999 to "*consider the re-design and re-write of EPOSS, in part or in whole, to address the then known shortcomings*", and that in WITN0387_01/21, it was suggested that that recommendation be reconsidered. This recommendation was also raised again in the Schedule of Corrective Actions: CSR+ Development Audit dated 22 November 1999 (WITN0387_01/22) and the Schedule of Corrective Actions: CSR+ Development audit dated 10 May 2000 (WITN0387_01/23), in both cases at item "015/04".
57. My recollection is that, at the time, Terry Austin was leading an exercise to improve the quality of EPOSS. I note that he is listed as the owner of item "015/04", which John Bennet (while he was managing director of ICL Pathway) and I were providing management supervision for. Having reviewed the "*Agreed Action/Commentary*" for item "015/04" in WITN0387_01/23, my recollection is that Terry Austin was of the view that the EPOSS system was

stabilising and it would be better to continue with quality improvements rather than re-develop the system.

58. I believe there were discussions about this issue at the management level as well, and these would likely have involved me, Terry Austin, Tony Oppenheim and Mike Stares (who by May 2000 had taken over from John Bennet as managing director at ICL Pathway). I understand from WITN0387_01/23 that the conclusion reached was that ICL Pathway would accept "*the ongoing costs of maintenance rather than the cost of a rewrite*". This meant that ICL Pathway would not try to produce a new EPOSS product, but would use available resources to maintain the existing EPOSS product at an acceptable standard (e.g. by managing any PinICLs). I do not recall the reasons for this decision or the specific discussions that took place, but believe it was a judgment call by the management team that it was not worth redeveloping the EPOSS system as it was getting closer to becoming a stable system.
59. I am not in a position to say whether, in hindsight, this was a correct decision. This is because I do not recall the specific reasons behind this decision or the outcomes it had. I note that I suffered my first stroke less than a year after this decision is recorded in WITN0387_01/23.
60. I do not specifically recall if POCL was informed of the issues with EPOSS, though it may have come up at a high level in my discussions with Dave Miller. However, I would have expected them to have been aware. I note that at section 7.1.2 of WITN0387_01/20, there is a discussion of POCL's involvement in EPOSS in the context of the EPOSS PinICL Task Force's work.

MY REFLECTIONS ON THE PROGRAMME

61. In the Request, the Inquiry has asked me to provide my reflections on a number of matters relating to the Programme and rollout of Horizon, which I provide below.

Whether rollout took place at the right time and Horizon's fitness for purpose

62. The acceptance process was about whether rollout was allowed by POCL, and the decision to rollout Horizon was ultimately a judgment call taken by POCL. ICL Pathway's judgment call was whether to push for rollout, taking into account the steps had been taken to design, develop, test and prepare Horizon for rollout. We worked closely with POCL throughout all of the various stages of the Programme to ensure Horizon met POCL's requirements.

63. For me, a product or service that is fit for purpose achieves its business purpose. In my experience, if a system is produced that fulfills the requirements agreed between the customer and the product provider, and the product is in operational use, the product is fit for purpose so far as its purpose is defined.

64. While I cannot recall the specific steps that were taken during rollout or the discussions that were held at the time of acceptance, if I had held concerns about the timing of the rollout and whether Horizon was fit for purpose, I would have called for rollout to be delayed.

Whether ICL Pathway was equipped to take on a project of this size

65. In my experience, any large project will have peaks and troughs in resourcing and the available skills to carry out the work required. When I look back on the work undertaken while I was involved in the Programme, my impression is that

we were not prevented from getting additional resources and assistance when the need was identified. My appointment as Programme Director was an example of this. The Programme had a slow start, which is what led to the review that I led in 1997 (mentioned above at paragraph 10), and following this, ICL Pathway got the Programme back on track.

Informing POCL and the government about technical issues

66. I cannot recall the mechanism by which ICL Pathway informed POCL and/or the government about technical issues relating to Horizon at the management level, including in relation to rollout and acceptance. I can recall that PinICL management, along with the 'Known Problem Registers', were a mechanism by which ICL Pathway informed POCL concerning technical issues at the operational level.

Whether ICL Pathway should have done anything differently

67. In my experience, any project could have been done better in hindsight.

68. I can recall that when the contracts relating to Horizon had been finalised, everyone was 'hot off the blocks' and wanted to do too much too quickly. The review that I led in 1997 showed that, a complex customer-client relationship requires good governance and processes that need to be reviewed and modified as appropriate. The relationship was complex as it involved ICL Pathway as a platform provider of hardware and software putting a product into POCL's estate for the benefit of BA. I believe that the work undertaken in response to the review findings to put the Programme back on track worked well. The steps that the Programme took after I joined should have been taken sooner.

69. Another thing that ICL Pathway and POCL should have done sooner was to ensure there were persons, teams and/or mechanisms involving ICL Pathway and POCL that were responsible for cross-programme issues. Individual teams and managers were looking down their silos, but in the early stages of the Programme, no one was looking across silos. My role and team was put together partly for this purpose. I also recall that a 'commercial forum' was set up involving Tony Oppenheim, myself, Dave Miller and Tony Oppenheim's equivalent at POCL to address cross-programme issues.

Statement of Truth

I believe the content of this statement to be true.

Signed: **GRO**

Dated: 09/09/2022
09 sept 22

INDEX TO THE FIRST WITNESS STATEMENT OF MR MICHAEL COOMBS

Exhibit No.	Description	Date	Control Number	URN
MY ROLE AND THE PROGRAMME				
WITN0387_01/1	Letter to Peter Crahan from Dave Miller	30 June 1999	POL-0024875	POL00028393
WITN0387_01/2	Letter to David Miller from Tony Oppenheim	18 September 1998	POL-0027590	POL00031106
WITN0387_01/3	Letter to Mike Coombs from Barrie McNiven	21 May 1998	POL-0024867	POL00028385
WITN0387_01/4	Horizon Programme Board Report	16 June 1998	POL-0028726	POL00031133
WITN0387_01/5	Monthly Progress Report – Pathway Monthly Report June 1997	11 July 1997	POINQ0064333F	FUJ00058162
WITN0387_01/6	Report on Release 2 Process Improvement Programme	18 June 1998	POINQ0064630F	FUJ00058459
WITN0387_01/7	BA/POCL Programme Delivery Authority Board – Minutes of the Board Meeting 23 September 1997	23 September 1997	POL-0024792	POL00028310
WITN0387_01/8	BA/POCL Programme Delivery Authority Board – Minutes of the Board Meeting 21 August 1997	21 August 1997	POL-0024793	POL00028311
WITN0387_01/9	100 Trial Surveys Report v.1.0	2 March 1998	POINQ0064665F	FUJ00058494
WITN0387_01/10	ICL Pathway Memorandum. Subject 'Questions Raised at Treasury Review Panel Presentation'	28 May 1998	POINQ0085329F	FUJ00075720
THE TREASURY REVIEW				
WITN0387_01/11	ICL Pathway Diary Note - Banking Meeting with Frank Field	17 July 1998	POINQ0085332F	FUJ00075723

Exhibit No.	Description	Date	Control Number	URN
WITN0387_01/12	Minute: Meeting between ICL and George McCorkell (BA) - August 1998	14 August 1998	POINQ0085333F	FUJ00075724
NEGOTIATIONS OVER HORIZON AND ACCEPTANCE CRITERIA IN LATE 1998				
WITN0387_01/13	Check Point Meeting Agenda for 18 Nov 1998 and accompanying documents	18 November 1998	POL-0024937	POL00028455
WITN0387_01/14	Letter to ICL re: issues over acceptance of Pathway Proposal From: Dave Miller (POCL) To: Mike Coombs (ICL)	10 December 1998	POL-0025175	POL00028693
ISSUES IDENTIFIED IN 1999, BA'S WITHDRAWAL AND TRAINING				
WITN0387_01/15	Monthly Joint Implementation Report (April 1999 to May 1999)	14 May 1999	VIS00007635	NFSP00000187
WITN0387_01/16	ICL Monthly Progress Report	November 1999	POINQ0064359F	FUJ00058188
WITN0387_01/17	Release 2 Model Office Rehearsal 3 Closure Report	6 January 1999	POINQ0064593F	FUJ00058422
WITN0387_01/18	Letter from John Dicks to Bruce McNiven	11 August 1999	POINQ0068747F	FUJ00079159
ROLLOUT				
WITN0387_01/19	Schedule of Corrective Actions – NR2 Mid Stage Audits (Consolidated)	4 May 2000	POINQ0064635F	FUJ00058464
WITN0387_01/20	Report on EPOSS PinICL Task Force	14 May 2001	POINQ0086861F	FUJ00080690
WITN0387_01/21	CSR+ Development Audit	28 October 1999	POINQ0085953F	FUJ00079782
WITN0387_01/22	Schedule of Corrective Actions: CSR+ Development Audit	22 November 1999	POINQ0085954F	FUJ00079783
WITN0387_01/23	Schedule of Corrective Actions: CSR+ Development Audit	10 May 2000		WITN04600104