1   **Tuesday, 17 January 2023**

2   (10.00 am)

3   **MR BEER:**   Good morning, sir. Can you see and hear me?

4   **SIR WYN WILLIAMS:**   Yes, I can thank you very much.

5   **MR BEER:**   May I call Sandra McBride, please.

6   **SIR WYN WILLIAMS:**   Yes.

7   **SANDRA LOUISE McBRIDE**(affirmed)

8   **Questioned by MR BEER**

9   Q. Thank you very much. As you know, Mrs McBride, my name

10   is Jason Beer and I ask questions on behalf of the

11   Inquiry. Can you tell us your full name, please.

12   **A.** Sandra Louise McBride.

13   Q. Thank you very much. Thank you very much for coming to

14   give evidence to the Inquiry today and for previously

15   providing us with a witness statement. We're very

16   grateful to you for the assistance that you have

17   provided to our investigation. Can we start with your

18   witness statement, please.

19   **A.** Sure.

20   Q. If you can open up the folder in front of you, you

21   should find a witness statement in your name dated

22   12 December 2022, 15 pages in length, and at the end of

23   it should be a signature. Is that your signature?

24   **A.** Yes, it is.

25   Q. Are the contents of that witness statement true to the

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1   time it didn't exist and hadn't been rolled out; is that

2   right?

3   **A.** Yes.

4   Q. At that stage, were you trained to be a trainer before

5   you became a trainer, or did you just get appointed as

6   a trainer because of the experience you'd had as

7   a counter clerk?

8   **A.** Yes, it was because of my experience really as a counter

9   clerk, and I did do a small amount of training in the

10   local area. I think, in the same year, '93, there was

11   a change to Royal Mail services, and I trained some

12   subpostmasters on the new services, the new system.

13   Q. In 1997 you moved to become what you describe in your

14   statement as a CM2 manager. What's a CM2 manager?

15   **A.** Counter Manager level 2, I think it stood for.

16   Q. And your statement also describes yourself as

17   a Transactional Knowledge Manager. What was

18   Transactional Knowledge Manager?

19   **A.** Right. So there was a few of us around the country and

20   our role was to take -- deliver sessions for

21   subpostmasters, mostly in the evenings, and we had

22   a load of laptop computers which we took with us, and

23   the subpostmasters completed a transactional knowledge

24   quiz on these computers. So that was -- we did that

25   also at Crown offices as well but mostly subpostmasters.

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1   best of your knowledge and belief?

2   **A.** Yes.

3   Q. Thank you very much. A copy of your witness statement

4   will be uploaded to the Inquiry's website and thereby

5   publicly available. So I'm not going to ask you

6   questions about every part of it. Do you understand?

7   **A.** Okay, sure.

8   Q. Can we start, please, with your background and

9   experience. I think you joined the Post Office in 1986;

10   is that right?

11   **A.** Yes.

12   Q. And you left in 2016?

13   **A.** That's right.

14   Q. So had a 30-year career in the Post Office; is that

15   right?

16   **A.** Yes.

17   Q. I think you started as a counter clerk; is that right?

18   **A.** Yes.

19   Q. Then in 1993 you moved to the training team as

20   a subpostmaster trainer; is that right?

21   **A.** That's right, yes.

22   Q. And was that training provided in branch to

23   subpostmasters rather than classroom training?

24   **A.** It was, yes.

25   Q. And that wasn't about the Horizon System because at that

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1   Q. And so the Crown offices, I think you say in your

2   statement, were during the day?

3   **A.** That's right, yes.

4   Q. The SPMs were in the evenings?

5   **A.** That's right, yes.

6   Q. Although you were using computers in order to train and

7   to, I think, administer the quiz -- is that right?

8   **A.** Yes.

9   Q. -- that wasn't training on Horizon because, similarly,

10   at that stage Horizon hadn't been rolled out?

11   **A.** That's right, yes.

12   Q. That role was, I think, eventually dissolved, and you

13   went into the classroom to deliver new entrant training;

14   is that right?

15   **A.** That's right, yes.

16   Q. I think, when you delivered that classroom training --

17   is that right -- you did use Horizon?

18   **A.** I'm not 100 per cent sure, to be honest, whether --

19   because I can't remember exactly when it went into the

20   classrooms, but initially in '97 it would have just been

21   the manual classroom training.

22   Q. Yes. If you just look at your statement --

23   **A.** Yes.

24   Q. -- please, and look at the second page and the paragraph

25   number 2, you say:

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1   "As far as I recall, I used a training Horizon
2   System (not live) during occasionally classroom training
3   I delivered prior to my maternity leave in May 2000."
4   I think that's the period we're talking about. Is
5   that right there?
6 A. Without knowing exactly the dates when the Horizon was
7   put into the CTOs, I can't recall whether that was with
8   Horizon or without, to be honest.
9 Q. You are referring to CTOs there. Can you explain what a
10   CTO is.
11 A. It stands for Counter Training Office. It's where the
12   classroom-based training took place.
13 Q. Where was that for you?
14 A. For me that could have been lots of different places.
15 Q. What was your geographical area?
16 A. So I was based in Colchester. We did have CTO at
17   Colchester at one point but I think that was quite early
18   days. But I would work in Bury St Edmonds, Ilford,
19   wherever I was asked to go really.
20 Q. So in the East Anglia area moving into East London; is
21   that right?
22 A. Yes, yes.
23 Q. So that's right, is it, that first part of the sentence
24   in paragraph 2: before you went on maternity leave, you
25   did use a Horizon training system in the classroom, but

5

1   you can't remember how far back before May 2000 that
2   was?
3 A. No.
4 Q. Before you delivered training on Horizon, using Horizon,
5   were you yourself trained in Horizon?
6 A. I remember having the two days' training that everybody
7   got. You know, I think managers got two days and clerks
8   got one day, if I remember rightly.
9 Q. You say that, I think, in paragraph 6 of your witness
10   statement, if we go over the page. You say:
11   "I've been asked how much experience I had using
12   the Horizon IT System prior to training others on how to
13   use it. As far as I recall, I received the standard 2
14   days Horizon training which I believe was delivered by
15   the external trainers."
16   Is that right?
17 A. That's right.
18 Q. So you got the same training as everyone else, no
19   special training because you were going to be a trainer?
20 A. Not that I -- not that I recall. I remember having the
21   two days, but to deliver the classroom training I must
22   have had some kind of training on the system that was in
23   the classroom because that was slightly different.
24 Q. Slightly different to ...?
25 A. To the live environment.

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1 Q. Can you remember the differences between it and the live
2   environment?
3 A. I remember initially -- we weren't -- initially with
4   Horizon we had stand-alone units in the classroom. So,
5   for example, if there were six positions in the
6   classroom, each counter as such get its own unit. So
7   they weren't linked like they would be in a branch.
8 Q. We're going to come to some of the detail of this later.
9 A. Okay.
10 Q. That's one difference. If there were multiple counters
11   in a live environment, that wasn't replicated in the
12   classroom?
13 A. No, that's right.
14 Q. Can you remember now any other differences between the
15   classroom system, the stand-alone terminals and out in
16   the field?
17 A. Some of the transactions, I think I mentioned in my
18   statement as well, we couldn't do on the training
19   system. For example, at a later date we couldn't do
20   pensions, cash pensions, through the system. We had to
21   go into training mode for it. That was a workaround.
22   That information is from the documents. So I didn't
23   really remember that, but that triggered that memory
24   from the documents you sent to me.
25 Q. Yes.

7

1 A. So where -- and also, where there was a third party
2   involved as in, if the system had to retrieve data from
3   elsewhere, like DVLA, then we didn't have that facility
4   in the classroom. So we had to have what's called an
5   emulator to emulate responses if we did those
6   transactions. I think that was with Horizon Online
7   rather than with the original Horizon.
8 Q. Thank you. So far as you were aware, was the position
9   that you found yourself in, i.e. giving training, on the
10   basis of the standard two days' training that everyone
11   got, the same for other trainers too?
12 A. I can't recall. I can't recall what the other trainers
13   received.
14 Q. Can you recall a training course for trainers that you
15   didn't go on but other people did?
16 A. There may well have been actually; there may well have
17   been.
18 Q. Why wouldn't you have gone on it?
19 A. I might have gone on it. I can't remember, sorry.
20   I don't remember.
21 Q. Your recollection as you have written down in your
22   statement there is that you received the standard two
23   days' training that everyone got?
24 A. Yes, I definitely did do that; I do remember that.
25 Q. Did you ever receive any refresher training on Horizon?

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1 A. Not specifically, no.
2 Q. Was it ever discussed whether it might be an idea?
3   I think you continued to work with Horizon for 16 years
4   essentially from when you returned from maternity leave
5   I think in November 2000 until you left the organisation
6   in 2016, that refresher training might be a good idea?
7 A. Yes, yes, it would have -- I think we were really, as
8   trainers, required to keep themselves up-to-date with
9   the system.
10 Q. How would you keep yourself up-to-date with the system?
11 A. The same as anybody in the live environment, really.
12   You'd be notified of changes and any updates that were
13   made through the normal communication channels of
14   updating everybody. I can't remember exactly what they
15   were at the moment.
16 Q. But, so far as you remember, no dedicated refresher
17   training?
18 A. Not that I can recall, no.
19 Q. As I think we'll discover in a moment, and as you've
20   already mentioned, at this time you were using
21   a training version of Horizon and not the operating
22   version that was used in the live estate; is that right?
23 A. That's right, yes.
24 Q. I think you undertook that role until May 2000. As
25   I said already, you returned from maternity leave in

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1   November 2000 and from that time onwards you had an
2   administrative function; is that right?
3 A. Yes.
4 Q. Would a fair description of that be having
5   responsibility for the maintenance of the new entrant
6   counter training materials?
7 A. That's right.
8 Q. Was that a regional role or a national role?
9 A. National.
10 Q. Was it -- I was going to say just you. That sounds
11   terrible. Was it you or was there anyone else doing it?
12 A. Well, I was the only person who did that role, but I had
13   support from the team, the wider training team.
14 Q. What support did the wider training team give you?
15 A. They would be involved in changes. So I organised
16   a group from the team, sort of like so there was some
17   trainers, some training managers, and a trainer coach
18   which was sort of a high level of manager, and we had
19   regular meetings to discuss changes to the course
20   materials. So their input helped identify changes that
21   we needed to make, any amendments.
22   So that's where the support was in that their
23   knowledge and experience of using the training materials
24   sometimes identified improvements, and obviously then,
25   if there were any changes to products, then we would as

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1   a group make sure that the changes were made to all the
2   materials in the course.
3 Q. Did you hold the pen, as it were, over the changes to
4   the manual or the materials?
5 A. Yes, I sort of like -- you know, I was the custodian of
6   them all and -- yes, so I just made sure that those
7   changes were made. Some of the changes I made myself,
8   once somebody had identified what needed to be done. So
9   a lot of those changes I did do after agreeing with the
10   team, the working group that I worked with, what changes
11   were needed.
12 Q. Just to be clear as to the extent or limitations of your
13   role, you weren't involved in the initial rollout of the
14   Horizon training programme, i.e. existing subpostmasters
15   and counter staff, their training on the new Horizon
16   System?
17 A. No.
18 Q. That was down to, I think, the company responsible for
19   the design and build and rollout of the system?
20 A. Yes.
21 Q. Which became Fujitsu?
22 A. Yes.
23 Q. Your role was to have responsibility, secondly, for the
24   entire suite of training materials -- is that right --
25   for trainees on the new entrant counter training

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1   programme?
2 A. Yes, just the new entrant training, yes.
3 Q. And that obviously included an element, a significant
4   element, of training on the Horizon System?
5 A. Yes.
6 Q. Now, you say in paragraph 17 of your witness statement,
7   if we just turn to that, please, which is on page 5, in
8   the third sentence, the fourth line:
9   "The training course changed in length and content
10   over the years. Initially the classroom course was only
11   available to Branch Office staff but after making
12   changes it was offered to subpostmasters."
13   When did that change take place?
14 A. I don't recall exactly when that was.
15 Q. Can you recall why the new entrant training as
16   a classroom course was only available to branch office
17   staff?
18 A. No, I don't know why.
19 Q. And only rolled out to those becoming subpostmasters
20   later?
21 A. Yes, I don't know why that decision was made to change
22   that.
23 Q. I'm looking at it the other way round: why the decision
24   was made not to include subpostmasters from the outset.
25 A. I don't know because --

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1 Q. I know it wasn't your decision presumably.
2 A. No. The classroom training initially was offered to --
3   or it was mandatory for branch office staff. That was
4   in place when I joined in '86 actually. So I don't know
5   why that was how it was, but that was how it was when I
6   joined.
7 Q. You say, picking up on what you've just said, if we go
8   over the page to paragraph 21:
9   "New entrant training was offered to all new
10   subpostmasters although was mandatory for Branch Office
11   staff."
12   Are you drawing a distinction there between one
13   being optional and one being mandatory?
14 A. At a later date, once the classroom training was offered
15   to subpostmasters, it was offered to them rather than
16   being mandatory like it was for branch office staff.
17 Q. Why was that?
18 A. I don't know, to be honest.
19 Q. Can you think of a reason why a distinction was drawn?
20 A. Because I'm guessing that, when a subpostmaster takes
21   over a post office, they've got a lot to deal with.
22   They may not have been able to take the time out to go
23   to the classroom training. The location of the
24   classrooms might not have been suitable.
25 Q. Why didn't those things apply to counter staff?

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1 A. I think with counter staff, as far as I'm aware, they
2   were able to book into accommodation, like hotels, if
3   they were a long way from a CTO counter training office,
4   which -- that didn't apply to subpostmasters.
5 Q. So it was about accommodation relating to attendance
6   that --
7 A. Yes, so they could get to a counter training office.
8   So, if it was a long way from -- because we had several
9   around the country, but obviously not everybody was able
10   to travel perhaps on a daily basis to a counter training
11   office. So they were put up in hotels to enable them to
12   attend.
13 Q. That was the reason why it was only voluntary attendance
14   for subpostmasters?
15 A. No, I don't believe that is why it was only voluntary
16   for subpostmasters. I don't think they were -- the
17   business would pay for them to go to the hotel, but
18   I don't know.
19 Q. Other than that you don't know the reason?
20 A. That's my assumption really.
21 Q. Okay, thank you.
22   Now, I think there came a time when the audit team
23   merged with the training team.
24 A. That's right, yes.
25 Q. After that time, you had responsibility for maintaining

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1   the audit documents and tools as well as the training
2   documents and tools.
3 A. That's right, yes.
4 Q. Again, was that a national responsibility?
5 A. Yes.
6 Q. So, if from whenever this date was -- we'll establish
7   the date in a moment if we can -- somebody was to ask
8   who's responsible for the maintenance of policy
9   documents or protocol documents relating to audit
10   nationally, that would be you?
11 A. Yes.
12 Q. Can you remember when you assumed that position, when
13   you took up that role?
14 A. Not exactly, no. I don't know when that --
15 Q. So it's after November 2000?
16 A. Yes, it would have been, yes.
17 Q. And before 2016 when you left?
18 A. Yes.
19 Q. Any recollection as to, in that 15 or 16 years, when
20   that might be?
21 A. From seeing a document on here that you supplied, it
22   states that it was around about 2008.
23 Q. Yes. We're going to look at that document a little
24   later in the morning. But you have read that now. Does
25   that jog your memory at all, or doesn't it assist --

15

1 A. Well, it says 2008, so I trust it was 2008.
2 Q. Okay. What were the reasons, as you understood them,
3   for the merger of the two teams, audit and training?
4 A. I think -- I don't know for sure, but my guess is that
5   it was to utilise the number of trainers that we had,
6   you know, to make the trainers multi-skilled, because
7   there was -- the training team was quite a large team,
8   and I think that was one of the reasons to multi-skill
9   the field trainers.
10 Q. I was going to ask you that. Were the existing teams,
11   the teams of trainers and the teams of auditors, asked
12   to carry out their existing roles, i.e. the trainers
13   stayed as trainers and the auditors trained as -- stayed
14   as auditors or, after the merger, did auditors carry out
15   training and trainers carry out audits?
16 A. Yes, they did, yes. They wanted all the advisers, as
17   they became known, to be multi-skilled to be able to do
18   both.
19 Q. Would it be right that sometimes a failure in training
20   might manifest itself in the course of an audit? If
21   somebody hadn't been properly training about
22   something --
23 A. Possibly, yes.
24 Q. -- they might make mistakes?
25 A. Yes.

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1 Q. And those mistakes might show up in an audit?
2 A. If they weren't perhaps following procedures, it might
3   do. The audit was primarily to check the assets in the
4   branch against what the Horizon System, when Horizon was
5   in, said there was. So I suppose, if somebody hadn't
6   been trained properly in those procedures, they could
7   make errors.
8   The audit also included other areas such as
9   compliance. So the auditors would check compliance as
10   well.
11 Q. Compliance with what?
12 A. Anti-money laundering and areas like that.
13 Q. So regulatory compliance?
14 A. That's right, yes.
15 Q. Would it ever be the case that a person that had been
16   trained by a training and audit adviser would then be
17   audited by that same person?
18 A. Possibly, yes.
19 Q. Is that because the pool was relatively small and
20   geographically based?
21 A. The pool of --
22 Q. Training an audit adviser.
23 A. That was quite a large number of people, but obviously
24   I think, when they were scheduled to attend an audit,
25   the advisers would be allocated a branch fairly local to

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1   them, which would apply with the training aspect as
2   well.
3 Q. So it's the geographical limitation that means you might
4   get the same person that trained you as a year or two
5   later auditing you?
6 A. Yes.
7 Q. You refer -- we needn't turn it up -- in paragraph 46 of
8   your witness statement to trainers being trained on
9   audit tools and shadowing auditors and vice versa. Is
10   that because they were required to multitask?
11 A. Yes.
12 Q. Was that from 2008 again?
13 A. Yes, it would have been, yes.
14 Q. Can we look, please, at a document POL00043806. This is
15   going to come up on the screen for you. It's going to
16   be so complicated to find where you are on that. This
17   document, take it from me, describes you as the audit
18   and training adviser.
19 A. I haven't seen anything yet.
20 Q. I think it's coming up on the screen now. If we go over
21   to the next page, please.
22 A. I can't see anything on my screen at the moment.
23 Q. Just wait a moment. Somebody will come out and help.
24   Can you now see?
25 A. Yes, I can.

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1 Q. In the time that that's taken, I've now lost you. Take
2   it from me this describes you as an audit and training
3   adviser.
4 A. Yes.
5 Q. Is that right?
6 A. That was the role I was at the time, yes. That would
7   have been my title, yes.
8 Q. So, if you had to fill out a passport application and
9   they said, "What's your job title", you would have
10   written in it "audit and training adviser"?
11 A. Yes.
12 Q. Who did you advise, or is that a misdescription?
13 A. Yes, I didn't sort of advise as such.
14 MR BEER: Sorry, the document can be taken down now
15   particularly as it was of no use to me.
16 A. I think we were all called advisers in some format, like
17   the field support advisers, they were the
18   trainers/auditors. The role name changed -- my role
19   name changed over the course of the years I did it but,
20   you know, I don't really call myself -- I don't recall
21   being an adviser as such.
22 Q. You wouldn't have seen yourself as an adviser?
23 A. Not really, no.
24 Q. Just like the people that were doing the training, you
25   wouldn't have seen them as advisers?

            19

1 A. No.
2 Q. You would have called them trainers?
3 A. Yes.
4 Q. And the people doing the auditing, you would have seen
5   them as auditors, not advisers.
6 A. No, not really, no.
7 Q. Did you in fact give advice at all to anyone?
8 A. Not really, no. I don't think so.
9 Q. Did you advise over the content of the changes to the
10   training materials and audit materials, or did you just
11   administrate the changes that were made by others?
12 A. I did have -- I suppose I would have had input into
13   that, into the changes.
14 Q. What do you mean by you would have had input? Can you
15   give us a feel for the extent of your involvement?
16 A. For example -- I'm trying to think of an example ...
17 Q. So when Horizon Online came in, say in 2010, there would
18   have needed to be a change to the training
19   manuals/materials?
20 A. Yes.
21 Q. Would you have sent a memo out to trainers or manager
22   trainers and said, "This thing is coming in, we need
23   some content, please suggest the content", they send it
24   in, you collate it, or would you have said, "No, I don't
25   think that's a very helpful suggestion to a change to

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1   the materials. I think it would be better worded like
2   this"?
3 **A.** Yes, I suppose I did have that sort of input, like
4   I would perhaps make sure that it was -- any training
5   material, as in trainer notes that they would have to
6   refer to if they were running a course, for example, was
7   legible and easy to understand for the person delivering
8   it, and that it was grammatically correct and that sort
9   of thing. So that sort of thing, really.
10 **Q.** So that makes it sound as if your role was still
11   relatively administrative --
12 **A.** Yes.
13 **Q.** -- making sure that things were grammatically correct
14   and made sense, rather than making changes to or
15   suggesting changes to issues of substance?
16 **A.** Yes, yes, and I was responsible for making sure version
17   control was kept up to date, and make sure things
18   were -- and communicated to the team. So, when changes
19   were made, I would, you know, make sure that one was
20   aware of those changes.
21 **Q.** Can we look, please, at POL00085658. This is a set of
22   slides that you, I think, refer to in your witness
23   statement because the Inquiry had shown them to you --
24   that is paragraph 53 of your witness statement -- and we
25   can see this is a set of slides headed

21

1   28 September 2011, Audit Review Cascade. On the first
2   page there's mention of Sue Richardson, the
3   Projects & Standards Manager.
4   On the second page of the slides under heading
5   "Background", it says:
6   "Early 2008 the network support field team (NSFT)
7   took over responsibility for financial and compliance
8   auditing from the national audit team."
9   Is that the document you were referring to earlier
10   when you referred to the date being 2008?
11 **A.** Yes.
12 **Q.** It refers to that team taking over responsibility for
13   financial and compliance auditing. Was there any other
14   kind of auditing?
15 **A.** No, not that I recall.
16 **Q.** So they took over all auditing?
17 **A.** Financial audits and the --
18 **Q.** Yes.
19 **A.** Yes.
20 **Q.** If we just go forwards to page 10 of this document,
21   please, chapter 2 of the slides appears to refer to you
22   and Mr Paul Humber giving the presentation.
23 **A.** Yes.
24 **Q.** Who was Paul Humber?
25 **A.** Paul Humber was a field support adviser. He was

22

1   originally in the audit team prior to joining with the
2   training team, and he was a very knowledgeable and
3   experienced auditor.
4 **Q.** You probably don't remember delivering this session but,
5   looking at the slide, it suggests you maybe delivered it
6   together with him.
7 **A.** Yes, that --
8 **Q.** Is that a fair inference?
9 **A.** Yes, I think so, yes.
10 **Q.** If we look over the page, please, to page 11, can you
11   help us as to what this is describing or doing, what's
12   being presented here.
13 **A.** So I think what this is displaying is that the person
14   named on the left would be the person who has suggested
15   an update. The request, as it is detailed, what they're
16   suggesting and what we've done about and what the
17   benefit of that suggestion or change was.
18 **Q.** I see. So you were essentially running through
19   suggestions to changes, the response to them, and the
20   believed outcome of them?
21 **A.** Yes, yes. So the review I think was -- I think what we
22   did or what Sue asked for, we would get feedback from
23   the team and, I think, perhaps stakeholders as well
24   involved. I don't know if it was this document or
25   a different one and, because I looked after chapter 2

23

1   with Paul, that's why me and Paul were delivering this
2   section, and these are the changes that were suggested
3   for this particular section.
4 **Q.** And this is all about audit rather than training?
5 **A.** This is audit, yes, and -- yes, so these are the
6   feedback that we would have received, and that's what,
7   you know, the details what we did.
8 **Q.** In the course of the suggestions and the responses,
9   there's reference to debts in branch accounts being
10   shown up on audit. What experience at this time did you
11   have of debts or discrepancies showing up in branch
12   accounts?
13 **A.** Not much, to be honest.
14 **Q.** That was the purpose of an audit amongst other things?
15 **A.** Yes, yes, to identify.
16 **Q.** To identify a discrepancy?
17 **A.** Discrepancies, yes.
18 **Q.** By this time -- so September 2011 -- how frequently --
19   do you remember I got the date September 2011 from the
20   front slide?
21 **A.** Yes, yes.
22 **Q.** How frequently to your knowledge were debts or
23   discrepancies shown up in audits?
24 **A.** I don't know. I don't know. I wouldn't know the data.
25   I don't know how frequently that would happen.

24

1 Q. Were the causes of such debts or discrepancies ever fed
2   back to you?
3 A. No, no --
4 Q. Did anyone mention that by this time, September 2011,
5   that Horizon itself might be causing debts or
6   discrepancies to be shown?
7 A. No, not at all.
8 Q. That the system itself was responsible for creating and
9   creating falsely shortfalls?
10 A. No.
11 Q. In your career -- we'll look at this in more detail in a
12   moment -- right up until 2016, had you ever heard of
13   such a suggestion?
14 A. No.
15 Q. Overall, how did you regard the robustness and
16   reliability of the data produced by Horizon from, say,
17   November 2000 until you left the organisation in 2016?
18 A. I trusted it, I suppose. We worked with the system, we
19   expected it to be right, and we trusted the information
20   that it produced.
21 Q. And why did you trust it?
22 A. I don't know really. I suppose it's because we -- we --
23   I was just going to say trust again. I don't know why I
24   trusted it, because we hadn't any other reason not to
25   I suppose.
                          25

1 Q. Did you assume that it had been through some process of
2   procurement and testing and validation, for example?
3 A. Yes, yes.
4 Q. That you assumed that the Post Office wouldn't roll out
5   a system that was riddled with errors?
6 A. That's right, yes.
7 Q. To your knowledge, was that trust in the system ever
8   called into question?
9 A. No, not from what I recall.
10 Q. Did anyone mention that the system had bugs, errors and
11   defects in it --
12 A. No.
13 Q. -- that were liable to produce false data?
14 A. No.
15 Q. Now, you have already told us -- that document can come
16   down, thank you -- that the training machines used for
17   training on Horizon were not live, in inverted commas,
18   so were therefore different to those used out in the
19   field; that's right?
20 A. Yes.
21 Q. Do you know why that was, that the machines used to
22   train people were in that respect different from those
23   that they would then use when they got out into the
24   field?
25 A. I think it's so that there could be no danger of any
                          26

1   transactions that were conducted in the training going
2   into the live estate, if you like. I don't know for
3   sure.
4 Q. Do you know whether any consideration was given to
5   partitioning the training system so that that couldn't
6   happen?
7 A. No.
8 Q. Still having it live but partitioning it so that the
9   data couldn't affect the actual operations on the
10   ground?
11 A. When we had Horizon Online, I believe that we did have
12   certain things -- like the screen, certain screens were
13   as were seen in the live environment. So we received it
14   to us, but the data couldn't go the other way. So the
15   transactions couldn't be, you know, added to the live
16   estate data, if you like.
17 Q. We'll look at that in a little more detail when we look
18   at some documents later --
19 A. Okay.
20 Q. -- the process after 2010 with Horizon Online. But,
21   before then, can you recall whether any measures were
22   taken in the training that explained to trainees that
23   their appreciation of problems on the system might be
24   different when they are out in the field?
25 A. I think we would -- say we -- the trainers would say
                          27

1   it would be different in the field, because the amount
2   of transactions and stock and cash that we held within
3   the classroom environment was very small. So, when they
4   got to their branch, they're more likely to have had
5   a lot more of everything. So there's those differences.
6   As I said to you about the emulator, you know, we
7   had an emulator to emulate responses for certain
8   transactions, and then also I mentioned about the
9   pensions. Obviously, we had to do a workaround in the
10   classroom to enable the pensions to be trained. So that
11   was obviously different to what it would have been in
12   the live environment for the trainees.
13 Q. Let's look at some materials. Can we look at
14   FUJ00001703. Just to familiarise ourselves with the
15   date and the nature of the document, this is described
16   as a "Counter Training Offices Strategy". You'll see
17   that it's a Fujitsu Services document and you'll see
18   that it's dated 27 November 2002.
19   You'll see that the distribution of it includes
20   the Post Office and, amongst others, Sandra Lewis. Was
21   that you?
22 A. Yes.
23 Q. Your maiden name?
24 A. Yes.
25 Q. If we go to page 9, please, and look at the hardware
                          28

1 section under 3.2.1, you'll see that this records that:

2 "Each CTO is equipped with freestanding Horizon

3 training systems. A summary of the hardware is listed

4 below" and you'll see what it is.

5 Then under the bullet points:

6 "Each training system is a standalone counter.

7 Two of the counters will be connected to the Epson 200

8 inkjet printers. There is no connection to any other

9 counter or server and all the counters are identical in

10 every way."

11 So this is a reflection of the point that I think

12 you were making earlier or the evidence that you gave

13 earlier --

14 A. Yes.

15 Q. -- that this would differ from any branch in which

16 multiple counters were used out in the field?

17 A. Yes, yes.

18 Q. Do you know why that was?

19 A. No.

20 Q. If there was a particular problem with multiple counter

21 operation out in the field, if there was a bug or an

22 error or a defect in the system that particularly arose

23 when multiple counters were operated together, that

24 wouldn't be apparent in the training setup?

25 A. No.

<center>29</center>

1 Q. So that couldn't be trained on and, more importantly

2 perhaps, it wouldn't manifest itself to the trainers?

3 A. No.

4 Q. Then if we look at 3.2.2, please:

5 "The systems are built as standard training

6 counters of the type and software level used for

7 delivering classroom training to outlet managers and

8 their staff during the national rollout of Horizon. At

9 the time of installation the systems mirrored the

10 functionality of the systems being installed in live

11 offices at the start of national rollout. This release

12 was known as CSR. Since then, an upgrade has been

13 performed at release CSR+, at a level known as CI4.

14 "The systems also reflect the functionality

15 described in the training workbooks issued on training

16 courses during the national rollout. The training

17 counter also features facilities to run and reset

18 POLO~..."

19 Can you remember what that was?

20 A. No.

21 Q. -- "and to reset training data. Note that, unlike

22 training mode, the training data is not reset

23 automatically at power up, power down or a logout. The

24 CTO counter build currently contains both the standard

25 UK training build and the Northern Ireland variant. The

<center>30</center>

1 trainer is able to select which variant to load up and

2 run. This build will also support use of the OKI8P Plus

3 printer as well as the Epson Stylus 200. The systems

4 feature the same set of training data used by Pathway in

5 training mode and the delivery of training for the

6 rollout programme both at CSR and CSR+. When the CTO

7 systems were refreshed to reflect the functionality

8 being introduced at CSR+, additional data was included

9 allowing trainers to set exercises which use some of

10 Post Office Limited's own training aides: i.e. barcoded

11 bills and barcoded order books."

12 This is all detailed in another document.

13 Then can you help us then, with that in mind, from

14 your knowledge, to what extent did the software in use

15 in the training setup differ from that in the live

16 environment?

17 A. I don't know the specifics, to be honest. I believe

18 from reading another document that we had updates via

19 disks. Therefore, the training offices weren't updated

20 as quickly, I think, as the live environment. I can't

21 remember how the live environment was updated, but

22 I know from reading a document that you've shown me that

23 we received disks in the CTOs to update them. So

24 that --

25 Q. There was a timelag?

<center>31</center>

1 A. I think so, yes.

2 Q. But can you remember whether the aim was to replicate

3 from a software perspective everything in the live

4 estate in the training setup, or whether in fact there

5 were differences?

6 A. I can't remember whether there were -- what the

7 differences were, if there were differences.

8 Q. Can you remember a part of the system called Riposte?

9 A. Vaguely, yes.

10 Q. Can you help us: if there were, as we now know that

11 there are, errors, bugs and defects in the Riposte

12 message servers operating in the field in the live

13 environment, would you expect that also to be apparent

14 in the training units?

15 A. Yes, I would -- yes, I would expect so.

16 Q. Can you ever recall that being mentioned as an issue,

17 that the message servers used by Riposte had defects

18 within them?

19 A. No.

20 Q. About what information they were communicating?

21 A. No, I don't think so, no.

22 Q. Can we just fast forward a moment to 2016, please, and

23 see by the time you left what the position was then.

24 Can we go to POL00035737. Can you see that this is

25 a document, a Post Office document, headed "Counter

<center>32</center>

1   Training Office PoS Training System Requirements"? It's
2   dated 15 February 2016, and you can see that you're
3   listed as one of the reviewers. I think they must be
4   pre your leaving.
5   **A.**   Yes.
6   **Q.**   Do you remember this document at all?
7   **A.**   Not before seeing it --
8   **Q.**   More recently?
9   **A.**   No, that's right.
10   **Q.**   Now you've seen it more recently, can you tell us what
11   the purpose of the document was?
12   **A.**   I think -- well, as it says, it's stating our
13   requirements -- our, this is Post Office requirements --
14   for the training system.
15   **Q.**   And so who was it issued to?
16   **A.**   Fujitsu, I'm guessing.
17   **Q.**   If we look at page 4 of the document, please, just
18   familiarising ourselves with the background:
19   "Post Office undertaking a major transformation of
20   its IT systems, hardware and networks. This is known as
21   the Branch Technology Transformation programme."
22   Does that ring a bell now?
23   **A.**   Yes, vaguely -- not so well, to be honest.
24   **Q.**   "The replacement of the existing point of service system
25   Horizon Online used in all Post Office branches, British

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1   Forces branches, some admin locations and counter
2   training offices is part of the branch technology
3   transformation programme and is known as the front
4   office application, (FOA) programme. The CTOs (Counter
5   Training Offices) are used to train all new postmasters,
6   WH Smith colleagues and Post Office branch colleagues.
7   Each counter training office classroom is a live branch
8   on Horizon Online using live reference data, but all
9   transactions processed are clearly differentiated so
10   that training transactions are stored separately from
11   the live transactions."
12   That's what I referred to earlier as partitioning.
13   **A.**   Right, okay.
14   **Q.**   Can you remember that by this time, by 2016, the
15   position was that in the classroom, in the CTOs, each
16   classroom was a live branch using Horizon Online and
17   used live reference data?
18   **A.**   Yes, with Horizon Online, yes.
19   **Q.**   Can you remember when that change took place, that in
20   the classroom live reference data was used for training?
21   **A.**   No, I don't remember exactly when that was.
22   **Q.**   Was it timed at the same time as the introduction of
23   Horizon Online, or did it come in after the introduction
24   of Horizon Online?
25   **A.**   I don't remember.

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1   **Q.**   Do you know why the change was made, that live data was
2   used, live reference data was used?
3   **A.**   No.
4   **Q.**   Can you therefore not help us as to what prevented that
5   from happening whilst you were responsible for the
6   national training documents before then?
7   **A.**   No, I don't know.
8   **Q.**   Did anyone ever explore this: why can't we do in the
9   classroom the things that we're going to expect these
10   thousands of subpostmasters to do out in the field?
11   **A.**   Yes, exactly, yes, yes.
12   **Q.**   Train them in the same, using the same data that they're
13   likely to encounter when they get out there?
14   **A.**   I remember we would -- I can't remember exactly when it
15   was though, that we would often have feedback, if you
16   like, from -- well, not just -- you know, from myself as
17   well, that we should be training the same as what the
18   live environment were seeing.
19   **Q.**   When you say -- this document come down thank you. When
20   you say we would often have feedback --
21   **A.**   Yes. So trainers and -- it was just something that, you
22   know, we -- it was a -- we weren't able to always show
23   exactly what was in the live environment, and we would
24   express that. But I don't know why -- I don't know what
25   the reasoning was as to why we couldn't always have

35

1   that.
2   **Q.**   Was this a constant sort of niggle or concern?
3   **A.**   I think in the early days of Horizon it was, because
4   of -- but, once we got Horizon Online, obviously the
5   screens that we could see were the same, and the
6   processes, you know, were the same as well. But we
7   weren't able to do all transactions, if I recall -- it's
8   hard to remember -- on the training system.
9   **Q.**   Can you remember, when these concerns or issues were
10   raised, what the answer was that came back as to why we
11   can't do it? We want to train all of these
12   subpostmasters using a system that's the same as the one
13   out in the field, using data that's likely to be the
14   same as the data that they will be processing out in the
15   field. You can't do that because ... and what was the
16   because?
17   **A.**   I don't think there was a definitive answer that I can
18   recall. I have a feeling it may well have been around
19   budgets possibly because -- I don't know for sure but
20   that might have been an obstacle that, if we had to, or
21   the Post Office had to pay, or the training team,
22   whoever, had to pay for an upgrade, I think in the
23   earlier days that might have been an issue, and that
24   might have been a barrier to getting, you know, a more
25   up-to-date system for training.

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1 Q. Was it ever reported back to you that the system as
2   operated in the classroom manifested bugs, errors and
3   defects?
4 A. No.
5 Q. Can we turn to updates to the training equipment and
6   software and in paragraph 32 of your witness statement,
7   if we just turn that up please, 32 which is on page 8,
8   you say:
9   "I can recall that the training Horizon systems in
10   the CTOs were not always up-to-date so trainers had to
11   talk through some transactions that could not be
12   completed on the training Horizon system. When we first
13   received the training Horizon systems, I don't recall us
14   having input into what was on the systems."
15   So dealing with the first part of that first, the
16   systems in the classroom not always being up-to-date and
17   so trainers had to talk through some transactions
18   without being able to demonstrate them or tutees being
19   able to conduct them?
20 A. On the Horizon System, yes. We could explain how to do
21   a transaction physically but not necessarily on the
22   screen.
23 Q. Was that because of the system not being live? Is this
24   a function of or a consequence of the system not being
25   live?

                          37

1 A. Possibly, or that it was when we had the disks to
2   update. I can't remember exactly. Also, as I mentioned
3   previously with the emulator, that would emulate
4   responses, but with the pensions instance, that's the
5   main one really that comes to mind from looking at the
6   documents. So, you know -- I can't remember exactly
7   which transactions that we couldn't do, but I know there
8   were some that they couldn't physically do on the
9   system. But I think the thought was that it wasn't
10   a major issue, because the trainer could talk through
11   it, and the person would then receive on-site training
12   in their branch, so therefore they would see the
13   transaction live.
14 Q. The emulator, was that connected to anything outside of
15   the room?
16 A. I don't know.
17 Q. We know that the way that Horizon operated is that there
18   were connections to servers held in other parts of the
19   country, up in Bootle, for example, and one of the
20   issues that we've been exploring is errors, bugs and
21   defects in the local servers' communication with sending
22   messages to and from the servers up in Bootle.
23 A. Right.
24 Q. Can you recall whether the emulator was connected to
25   anything in that way?

                          38

1 A. I don't think so. I don't think it was. I don't know.
2 Q. So the system was sort of standalone in the classroom?
3 A. I can't remember how worked, to be honest. I think it
4   was just in the classroom, I think.
5 Q. What did it emulate?
6 A. Responses from DVLA. So, if you scan a barcode of 11,
7   it would emulate a response that you would receive in
8   the live environment from DVLA. The same for banking,
9   chip and PIN transactions.
10 Q. Any other examples, please?
11 A. I can't remember.
12 Q. Was it supposed to emulate third party, as you called
13   them, transactions?
14 A. Yes, yes. I can't remember any others.
15 Q. Was it part of the training to do balancing?
16 A. Yes.
17 Q. Did the emulator have any role in balancing?
18 A. No.
19 Q. Can we go, please, back to Fujitsu00001703. Remember we
20   looked at this a moment ago? Can we go to page 12,
21   please, and under the heading "Upgrading the Software
22   Level", at number 5, the first paragraph, the
23   document -- remember this is late 2012:
24   "The systems will receive software upgrades as
25   planned and agree between Pathway and Post Office

                          39

1   Limited."
2   I think that's meant to read "and agreed between
3   Post Office and Pathway":
4   "... because of the standalone nature of the
5   systems, it is not possible to keep them up to date with
6   the reference data changes which are regularly sent to
7   the networked systems installed in the live post office
8   outlets. Each counter is fitted with a removable hard
9   disk. This enables replacement disks to be easily
10   swapped in and out on site for the purpose of upgrading
11   the systems to a newer release when required."
12   Is that what you were referring to earlier about
13   updates not being automatic but there being a lag?
14 A. Yes.
15 Q. And then, if we go over to page 13, please, and scroll
16   down, please, three paragraphs from the bottom there,
17   the document provides:
18   "For clarification, there is no support in the
19   training counter for PIN pads, debit card method of
20   payment (or NBS) [Network Banking Services] since these
21   features are not supported in training mode. Support
22   for these features would require additional development
23   and testing effort and would need to be requested
24   separately."
25   That reflects the fact, doesn't it, that there

                          40

1   were differences, perhaps significant differences,
2   between the training machines operated as compared to
3   a live operating environment; is that right?
4   A. Yes.
5   Q. Would you agree that one benefit of having the live
6   reference data and essentially a live system operating
7   in the CTOs would have been that, if there were errors,
8   bugs and defects in the operation of Horizon, they would
9   have manifested themselves to the trainers?
10 A. Yes.
11 Q. The same trainers who were going to be the auditors?
12 A. Yes -- before 2008.
13 Q. Yes.
14 A. Or after -- after 2008 rather, yes.
15 Q. Well, both before and after 2008.
16 A. Yes, yes, that is right, yes.
17 SIR WYN WILLIAMS: I'm sorry, Mrs McBride, you dropped your
18   voice in that last exchange. Could you just say what
19   you told Mr Beer, please.
20 A. I was just saying -- initially I said before 2008 and
21   then I said after.
22 SIR WYN WILLIAMS: Yes.
23 A. And then Mr Beer did say before as well and I said yes,
24   that is right.
25 SIR WYN WILLIAMS: Fine. Thank you.
                          41

1   MR BEER: Now, you were involved in training, as we've
2   discussed, and had responsibility for the training
3   materials from when you returned from maternity leave in
4   November 2000 until you took redundancy some 16 years
5   later.
6   A. Yes.
7   Q. One of the things that training, good training, is
8   supposed to prepare trainees for is -- would you
9   agree -- when things go wrong with the systems that they
10   are using?
11 A. Yes.
12 Q. And one of the things that training, good training, is
13   supposed to prepare for is that, where there are known
14   problems or difficulties in the operation of a system or
15   in the operation of the processes that the trainees are
16   going to be able to, or going to be required to use,
17   good training informs them of such problems in advance ?
18 A. Yes, yes.
19 Q. It shouldn't be facing the training just towards a rosy
20   world where everything is perfect; it should be looking
21   at a world where things perhaps go wrong?
22 A. Yes.
23 Q. In that 16-year period that we're talking about, were
24   you ever told directly of any problems that arose with
25   the Riposte messaging system?
                          42

1   A. No.
2   Q. Did you ever hear any discussion, even overhear
3   discussion amongst others, about problems with the
4   Riposte messaging system?
5   A. No.
6   Q. Were you ever told directly of any problems with
7   Horizon's EPOSS system?
8   A. No.
9   Q. Did you hear about any problems concerning the Horizon
10   EPOSS system?
11 A. No.
12 Q. Were you ever asked by anyone else within Post Office to
13   address problems in the field in the training materials?
14 A. No.
15 Q. No?
16 A. No, not that I recall.
17 Q. We heard evidence last week from Chris Gilding. Did you
18   know Mr Gilding?
19 A. Yes, I do.
20 Q. He said that he found that subpostmasters and counter
21   clerks, other people using Horizon, could make mistakes
22   when they were using Horizon, including mistakes that
23   would affect accounting and balancing.
24 A. Yes.
25 Q. Were you aware that that could happen out in the field?
                          43

1   A. Yes, yes.
2   Q. I think that some of the training documents for which
3   you were responsible similarly appear to acknowledge
4   that mistakes may need to be corrected by
5   subpostmasters; is that right?
6   A. Yes.
7   Q. If we can look at one of them, please, POL00035624.
8   Thank you. Can you help us as to what this document is.
9   A. I believe this is like a training brief for the trainer;
10   that's their script, if you like.
11 Q. So notes addressed to a trainer to tell them how to
12   train?
13 A. Yes -- how to deliver the --
14 Q. How to deliver the training?
15 A. Yes.
16 Q. Or this element of the training?
17 A. Yes.
18 Q. If we could go forwards, please, to page 6 of the
19   document and look act the foot of the page, remming in
20   stock. Can you now remember what remming in and remming
21   out were?
22 A. Yes.
23 Q. Just describe for us, please.
24 A. So it's a way of -- I say remming in -- adding stock and
25   cash into the branch and, if you have excess stock or
                          44

1   cash, then you -- it's a way of getting it out of the
2   branch.
3 Q. And here we're dealing with remming in stock, and the
4   instructions to trainer are:
5   "To accept stock to a branch the individual pieces
6   of stock will be entered manually once they have been
7   checked. In the classroom setting, this is identical to
8   the branch other than the scanning of the pouch barcode
9   during the delivery stage. Talk the learners ..."
10   The learners, that means the people being trained,
11   yes?
12 A. Yes.
13 Q. "... through the path to the stock rem screen."
14   Then some instructions are given. Are they
15   keystrokes, F14 and F2?
16 A. Yes.
17 Q. "At this point, remind the learners that the quantity
18   button needs to be used to stop errors in volume. If
19   you rem in one book of 12 first class stamps instead of
20   50, you will have a gain that will result in a future
21   transaction correction, and this mistake could mask
22   losses that would have to be made good when the
23   transaction correction was received."
24   Can you explain what these instructions are
25   telling the trainer about.

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1 A. No, basically I think this area is around the example of
2   the first class book of stamps. They came in packs of
3   50. So, if the learner had put in one book of stamps
4   instead of 50, that would create a gain in their
5   balance. But that wouldn't necessarily show up as just
6   that amount at the end of the balancing period, because
7   there may have been other errors made during that
8   period.
9 Q. And this was masking them?
10 A. Yes. So you may well have created an error which would
11   cause a loss, in which case that gain would not show
12   fully necessarily.
13 Q. And presumably this is an example, and there were many
14   others like this?
15 A. Yes. Oh, absolutely, yes.
16 Q. To what extent was there knowledge within the training
17   community that unintentional errors by users out in the
18   field could lead to accounting discrepancies, including
19   imbalances?
20 A. Yes, I think that was --
21 Q. Widespread?
22 A. Widespread absolutely, yes.
23 Q. To what extent was that known by the auditors, that
24   a simple error of the type described here in the
25   operation of Horizon -- this isn't about a bug, error or

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1   defect --
2 A. No.
3 Q. -- this is in the simple operation of Horizon -- could
4   create imbalances like this unintentionally?
5 A. I would expect that to be the same as well.
6 Q. So equally known amongst trainers and auditors?
7 A. Yes.
8 Q. And that just because a loss is shown doesn't
9   necessarily mean a dishonest appropriation by
10   a subpostmaster?
11 A. No, absolutely.
12 Q. Would that be your first thought, if there was an
13   imbalance, it must be the subpostmaster that's taken the
14   money?
15 A. No.
16 Q. Why not?
17 A. Because they might have just entered a figure in
18   incorrectly into the system. They might have miscounted
19   their cash and then put the incorrect figure or stock in
20   the same way.
21 Q. And how many of these -- I mean, this is quite a neat
22   example here that we're looking at on the screen. How
23   many of these types of issue were there?
24 A. With the example?
25 Q. Yes.

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1 A. I don't know for sure, but I would imagine it's human
2   error to perhaps -- you know, to especially in that
3   instance where something comes in as a block and you
4   count it as one and actually it's 50. So that -- you
5   know that would possibly happen initially until maybe
6   you make a mistake once and then you learn, obviously
7   from it, don't you? But I would imagine that happened
8   quite frequently.
9 Q. Were there any prompts in the system, for example, on
10   this, where you could see that it's an error easily made
11   that came up on Horizon which said, "Check that you in
12   fact mean one book of first class stamps rather than
13   50"?
14 A. I can't remember. I don't think so but I can't remember
15   for sure.
16 Q. I.e. the system recognising the likelihood or
17   possibility of unintentional error, and prompting the
18   user to say: "Stop, think, do you really mean that?"
19 A. I don't recall.
20 Q. You don't recall any?
21 A. No, I don't -- I'm not -- no, I can't remember what the
22   system showed.
23 Q. Did the system communicate back to the user in that way,
24   so user messages?
25 A. I can't recall.

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1   Q.   In any event, this kind of error you would expect
2   knowledge of it to be the same in the auditing community
3   as in the training community?
4   A.   I think so, yes, yes.
5   Q.   Certainly after merger, because they are the same
6   people?
7   A.   Yes, yes.
8   MR BEER: Sir, it's just coming up to 11.20. I wonder
9   whether we might take the morning break. Thank you very
10   much, sir. Can we say 35 past?
11   SIR WYN WILLIAMS: Yes, certainly.
12   MR BEER: Thank you very much, sir.
13   (11.19 am)
14   (A short break)
15   (11.35 am)
16   MR BEER: Sir, good morning. Can you see and hear me again?
17   SIR WYN WILLIAMS: Yes, I can, thank you.
18   MR BEER: Thank you very much.
19   Mrs McBride, can we turn to the issue of on-site
20   training and balancing in particular. The Inquiry has
21   heard some evidence, and we'll in the coming months hear
22   some more evidence, about training on balancing being
23   supplemented by on-site training in the field.
24   Did you have any involvement in the provision of
25   that training or assistance?

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1   A.   No.
2   Q.   It was carried out by people described, at one stage
3   certainly, as field support advisers?
4   A.   Yes.
5   Q.   Were they within your area of responsibility?
6   A.   On a couple of occasions I did manage some field
7   advisers or trainers during that time.
8   Q.   Can we look at a document that might assist us here,
9   POL00034108.
10   Can you see the title of the document,
11   "Information for Field Support Advisers on Post Office
12   Local Branches", and then that foot of the page you can
13   barely see it's dated December 2012?
14   A.   Yes.
15   Q.   Is this a document within the suite of documents for
16   which you were responsible?
17   A.   Yes.
18   Q.   It is, okay. Then, if we look at the second page,
19   "Introduction to Post Office Local":
20   "This document will evolve as the project
21   progresses ..."
22   Can you help us with what the project Post Office
23   Local was.
24   A.   That's when branches were open for longer hours. So
25   they would be in a shop, for example, that opened at

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1   7.00 in the morning until possibly 10.00 at night, and
2   Post Office services would be available during that
3   time, not just the core hours from 9.00 to 5.30. They
4   would be able to provide certain Post Office services
5   after that time or before.
6   Q.   Can we go forwards, please, to page 7 and look in the
7   middle of the page, please. Under the three bullet
8   points:
9   "The FSA [the field support adviser] will be on
10   site for normal core hours (approximately 8.30 until
11   6.00 pm Monday to Friday and Saturday morning until
12   12.30). A follow-up balance will be added at the end of
13   the on-site support and, although Post Office Local
14   branches can do their BTS..."
15   Can you remember what BTS was?
16   A.   No, I don't remember what that is. I should know but
17   I can't remember. Sorry.
18   Q.   No, no, you're six years out of the job and this is
19   a decade ago.
20   "... at any time of the appropriate day under BAU"
21   --
22   A.   Business as usual.
23   Q.   -- "for the follow-up balance one FSA [field service
24   adviser] will attend to support from 1600."
25   A.   I've remembered what BTS is now -- Branch Trading

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1   Statement.
2   Q.   Thank you. Can you tell us what this is referring to
3   this follow-up balance?
4   A.   That's assistance at the next balance that the branch
5   would be doing once the trainer had left. So
6   a follow-up is like, once the trainer's left on
7   a certain date, and then the next balance that the
8   branch would be required to do, then the trainer would
9   be there to support them on that.
10   Q.   What was the need or purpose of this?
11   A.   It's just to support the branch further with their
12   balancing.
13   Q.   Can you remember any reports coming back as a result of
14   this that there were problems with balancing?
15   A.   Not that I recall.
16   Q.   Then, if we go forwards, please, to page 12 under the
17   heading "Balancing and Trading Periods", the document
18   says:
19   "It's at the operator's discretion whether they
20   complete an office balance on a Wednesday for a balance
21   period between trading periods. The branch has to
22   complete a trading statement on the Wednesday that their
23   trading group is scheduled to end their trading period.
24   This should be done at a quiet time ..." et cetera.
25   Can you help us what led to this additional

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1   support or training out in the field being thought to be
2   necessary?
3   A. No, I think, prior to this training, we would always
4   give support after the branch has been on -- you know,
5   the subpostmaster has been on their own for a few days.
6   So previously we would do on-site support training, and
7   then leave them on their own and then support them at
8   the balance. Because the balance was -- I say a
9   complicated thing but it could be, you know,
10   complicated, I suppose, so the support was needed. It
11   was thought that the support was needed in the balancing
12   area.
13 Q. Putting it bluntly, was this introduced because there
14   had been problems with balancing?
15 A. Yes, possibly. But I think the idea was that it
16   wouldn't really be right to let someone just -- once
17   a trainer had gone, just be out on their own without any
18   support, you know. So the balance was the area that it
19   was felt that they needed the support in.
20 Q. You've referred to it as being, or it could be
21   complicated, the balancing exercise --
22 A. It could be. Some people found it a bit confusing,
23   I think.
24 Q. And it was crunch time in the sense that it's when all
25   of the work of the previous trading period came

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1   together?
2   A. Yes.
3   Q. To your knowledge, were any additional staff recruited
4   for this purpose, or was this a function carried out by
5   the existing training and auditors?
6   A. It was carried out by the existing pool of trainers and,
7   yes, FSAs, as they were known.
8   Q. Can we turn back then, please, to POL00032429 to an
9   earlier upgrade to Horizon before it became Horizon
10   Online.
11   You'll see this is a note about the upgrade of
12   Horizon in December 2002 and, if we go over the page,
13   please, and look at the foot of the page, we can see
14   that it's authored by you. At this stage you're
15   described as a training or the training manager.
16 A. Yes.
17 Q. Did that accurately describe your job as at
18   December 2002?
19 A. Yes. That was my role name at the time. I wasn't a --
20   I didn't deliver training in that respect.
21 Q. Did you manage those that delivered training?
22 A. I possibly did at that point.
23 Q. What did you do to manage them?
24 A. That required having one-to-ones with the team,
25   cascading any changes to them in team meetings, and

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1   seeing them on site periodically while they're training
2   in, or a classroom if they were doing classroom
3   training.
4   Q. Did you have responsibility for documents that regulated
5   when and in what circumstances a reference would be made
6   to an investigation team?
7   A. No.
8   Q. Can you recall if there was a tipping point for
9   reference of a subpostmaster off to an investigation?
10 A. No.
11 Q. Did you ever have cause to refer a subpostmaster for
12   investigation yourself?
13 A. No, no.
14 Q. Can you recall whether any of the trainers for which you
15   were responsible had cause to refer people for
16   investigation?
17 A. No.
18 Q. You can't recall or that didn't happen?
19 A. As far as I'm aware, that didn't happen.
20 Q. What about when they were auditing at branches?
21 A. I didn't manage a team when they were auditors as well
22   as trainers. They were just trainers when I was
23   managing.
24 Q. So by that time, if it was 2008, by that time your
25   responsibility had turned more to the administrative

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1   side of the maintenance of the suite of documents?
2   A. Yes.
3   Q. Were you aware of people being sent for investigation at
4   that time?
5   A. No. Investigation in -- can you explain a bit more.
6   Q. Yes. An audit had shown a discrepancy, and it was
7   believed that the subpostmaster/member of counter staff
8   were responsible for the discrepancy and it therefore
9   required to be investigated.
10 A. Right.
11 Q. That they might be suspended or their branch closed or
12   there might be civil proceedings against them or they
13   might be prosecuted for a crime.
14 A. Okay. I was aware that there were discrepancies found
15   at audits. I don't know the details but I was aware
16   that, you know, that was something that happened.
17 Q. Were you aware of the follow-on from that, when
18   a discrepancy was found, what happened?
19 A. Not the full process but, yes, I was aware that there
20   could be -- they would be suspended, you know, if there
21   was a certain amount, I think, that was found to be
22   short, for example.
23 Q. Were the documents that regulated when somebody was
24   suspended, when their branch was closed, when they might
25   be investigated by Investigations Division or

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1   prosecuted, were those documents within the suite of
2   documents that you were responsible for?
3 A. The tool that the auditors used to identify
4   a discrepancy was, yes.
5 Q. What do you mean by the tool that was used?
6 A. The tool was known as a P32 which was its previous paper
7   number and it was like -- pretty much like a big
8   calculator really that auditors used to enter all the
9   details in from Horizon to get a figure, if you like, an
10   outstanding figure, a balance or not.
11 Q. What involvement to your knowledge was there of any
12   branch managers or area managers in decision-making over
13   investigation or prosecution of subpostmasters?
14 A. I think the contracts advisers were involved in making
15   a decision. That's based really on when I was looking
16   at the hearing from Friday that Chris was explaining,
17   and I thought: oh, yes that is -- that did remind me
18   that that is, yes, that was the process I think that, if
19   a certain discrepancy was found, then the contracts
20   adviser would be contacted.
21 Q. From your memory rather than watching Mr Gilding, can
22   you recall whether that was a consistent feature in the
23   process?
24 A. I don't know the results of all the audits, so I don't
25   know for sure.

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1 A. No.
2 Q. I was asking you now, looking at this document, is that
3   first sentence a reflection of the fact that the upgrade
4   allowed the training system to operate as a live part of
5   the system?
6 A. Yes, that's what it says, that it's the same as the live
7   system. So I would assume then that the system would
8   have been -- as it says there, you know, would have been
9   the same then up until October of that year.
10 Q. Well, it doesn't say that the training system was
11   operating as a live part of the system. It says in the
12   first sentence that it is same as the live system; do
13   you see?
14 A. Yes.
15 Q. I'm just trying to work out with your assistance exactly
16   what it does mean. Can you help us?
17 A. I can't really remember, to be honest.
18 Q. Put shortly, after this time, did the training units
19   continue to be disconnected from the network, continuing
20   to use an emulator?
21 A. Yes.
22 Q. So we are in the same position that any bugs, errors or
23   defects that were manifesting themselves in the system,
24   in the live estate, wouldn't be replicated in the
25   offline, standalone systems in the classroom?

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1 Q. No, I meant the involvement of a contracts adviser in
2   the decision-making process.
3 A. Yes, that would --
4 Q. That was a regular feature so far as you're aware?
5 A. Yes, yes.
6 Q. Go back to this document, please, back to page 1. Thank
7   you.
8   The first line says:
9   "The new training system is the same the live
10   system on the counter, up until the middle of
11   October 2002."
12   Can you recall whether this upgrade that you're
13   speaking to in this document meant that from that date,
14   the middle of October 2002, one which meant that the
15   training system could operate as part of the live
16   estate?
17 A. Sorry, can you say that again.
18 Q. Yes. You remember we discussed earlier whether the
19   standalone unit in the classroom operated as part of
20   the -- in the same way and as part of the live estate,
21   and you said not?
22 A. Mmm.
23 Q. I took you to a document that suggested that by 2016
24   they certainly did, and you said at some point there was
25   that change. You couldn't remember when.

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1 A. No, no.
2 Q. If we scroll down, please, and under Barcoded Bills you
3   refer to item 28/22H:
4   "Barcoded bill in the name of Ms I Lonely shows on
5   the screen at £22.50 instead of £82 which is on the
6   bill. This can be changed manually on the screen."
7   That appears to be a reference to a discrepancy in
8   a barcoded bill, yes?
9 A. Yes, although it does also highlight the fact that, if
10   somebody was only part paying a bill, the amount could
11   be amended on the screen manually.
12 Q. What does item 28/22H refer to?
13 A. It's a barcoded bill. I don't recall what type of bill
14   it was.
15 Q. What is a barcoded bill?
16 A. So it could be a utility bill which has a barcode which
17   could be scanned.
18 Q. So somebody comes in with a bill saying, "I want to pay
19   this bill"?
20 A. Yes.
21 Q. They present the bill to the SPM or counter clerk?
22 A. Yes.
23 Q. Rather than looking at the bill and saying, "Right, the
24   bill to be paid is £82" and typing in £82, they used the
25   scanning gun; is that right?

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1 **A.** That's right, yes.

2 **Q.** And they scan a barcode like one does at the shops?

3 **A.** Yes.

4 **Q.** And that comes up on the screen and it show £22.50

5 whereas it should show £82, because the bill is for £82?

6 **A.** That's right, yes.

7 **Q.** But it's showing £22.50.

8 **A.** Yes.

9 **Q.** Why would it show £22.50 rather than £82?

10 **A.** I see what you're saying. We've either communicated

11 incorrectly and got the barcodes printed wrongly, the

12 bills, because we used to get those printed ourselves,

13 or we were told it was for that amount and it wasn't.

14 I don't recall why that was different in that respect.

15 **Q.** Is this training materials you are talking about here?

16 **A.** Yes, 28/22H would have been something that we printed

17 ourselves, but we would have had to obtain it from --

18 now, would we have got that?

19 Some items we got from Fujitsu with certain

20 barcodes on, and other things we could produce ourselves

21 from our own -- if you like, our own, bit like a -- I

22 used to joke and say we're doing a Blue Peter job

23 because we would be able to scan -- like, I could have

24 my own barcoded bill from -- you know, from home, and we

25 would change all the details, use the barcode, but

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1 change everything else, and we could use that in the

2 classroom if we wanted extra examples.

3 But this one, I can't remember whether that was

4 one that was provided to us, or whether that was one --

5 I'm not sure where that came from originally.

6 **Q.** Can I ask --

7 **A.** I don't know why it was different. I don't know why it

8 was different.

9 **Q.** Can I ask: was the intention here to train people that

10 sometimes there can be a mismatch between what the

11 computer shows as the sum due as a result of scanning

12 a barcode and the actual sum due as printed on the bill

13 and, therefore, this was a training device intended to

14 identify a mismatch between a barcoded sum and the

15 actual sum?

16 **A.** I think from --

17 **Q.** Or was this a genuine mistake in your training

18 materials?

19 **A.** I think it might have been a mistake although, as it

20 says there, it's the way it's said, "This can be changed

21 manually on the screen." It's not saying this has been

22 done on purpose so that you can explain this. So

23 I think that would be a mistake.

24 **Q.** In your training materials, made genuinely rather than

25 a deliberate error in order to show trainees that there

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1 can be a discrepancy between the sum produced by the

2 machine for barcodes and the sum on a bill?

3 **A.** Yes, yes, I think it is an error.

4 **Q.** Were you aware of problems in the live estate of

5 barcoding producing a discrepancy between the sum

6 generated by Horizon and the amount on the face of

7 a bill?

8 **A.** No, I don't think -- I wouldn't have enough experience

9 on the live system to know that. But I wasn't aware of

10 that.

11 **Q.** This barcoded bill in the name of Ms I Lonely, it sounds

12 like from the wording here that this is a piece of

13 training material that's rolled out widely; is that

14 right?

15 **A.** Yes.

16 **Q.** Across the country essentially?

17 **A.** Yes.

18 **Q.** Why not change the barcode rather than -- if the

19 intention is to get the correct amount, why not alter

20 the training materials to get the right barcode and

21 therefore the right amount, rather than leave the wrong

22 barcode in and require a manual change on the screen --

23 **A.** I think --

24 **Q.** -- if this wasn't a training aid?

25 **A.** I think this was one that we had previously that we had

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1 previously used, and whether the -- and I think the

2 upgrade made it so that the amount was different when it

3 was scanned perhaps to what it was before. I don't

4 know -- I can't really remember.

5 **Q.** If you go back to the first page of the document --

6 **A.** Yes.

7 **Q.** -- it sounds like that barcoding is a new thing.

8 **A.** Yes.

9 **Q.** If you look at the first paragraph:

10 "The main differences for us are" --

11 And then if you look at the fourth bullet point:

12 "Barcoded bills can now be scanned."

13 **A.** Yes.

14 **Q.** Sounds like this is a new --

15 **A.** Yes, that is right. So we used it previously probably

16 without having to scan the barcode, so we could do it

17 without scanning perhaps. Now that the bills could be

18 scanned, this one came back -- why we didn't take it out

19 or -- we couldn't get the barcode changed, I don't

20 think. We perhaps could have done. I don't know how we

21 would have done that, but --

22 **Q.** Go forward a page, please, and scroll down.

23 **A.** Again I think the fact that it could be changed

24 manually, it wasn't perhaps a big risk as such to leave

25 it in there, because it did show -- as I said, it did

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1   show that you could change an amount if somebody didn't
2   want to pay a full amount of their bill, which they
3   could do on some utility bills. It showed that we could
4   change it manually on the screen.
5 Q. These are the final questions I ask on this issue. Just
6   go back to the page, please, and scroll down and just
7   read the whole of that barcoded bills point again.
8   Taking a step back, is this intended to tell
9   trainers that there's a problem with our system of
10   training, and there's a manual workaround to correct it,
11   or is this saying there's a deliberate error and we're
12   using this as a training tool to show people how
13   manually to change an amount because of a problem with
14   barcoding in the live estate?
15 A. No, I think it was your first point.
16 Q. Thank you.
17   Can we move forward, please -- that can come down
18   from the screen -- to a review of the audit process in
19   October 2011 and look at POL00085682.
20   You will see this document is headed "Review of
21   Post Office Limited Audit Processes and Tools" of
22   October 2011, authored again by Mrs Richardson. You are
23   part of the project team listed there.
24 A. Yes.
25 Q. Your job title is given as Network Change Adviser, as we

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1   saw.
2 A. Yes.
3 Q. Of the people listed there, are you the most senior in
4   the project team?
5 A. No.
6 Q. Who's the most senior there?
7 A. That would be Sue.
8 Q. Under project team?
9 A. Under -- oh, sorry. I think we're all the same.
10 Q. So you were all the same grade?
11 A. Yes. I don't know what Shirley's grade was. So all the
12   team leaders and the network services admin and
13   scheduling team leader and myself are all the same
14   grade.
15 Q. Can you remember this audit revision or review process?
16 A. Vaguely.
17 Q. What can you vaguely recall? How was it conducted?
18 A. I think, from looking at the other documents that have
19   been presented, that we obtained feedback from the team.
20   I'm trying to think. So each team leader was
21   responsible for a chapter of the audit process manual,
22   and they all reviewed their own chapters, and the
23   review -- that was what the review was. They had to
24   review their own chapters, and I think this is what that
25   review is. The team that taken over the audit processes

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1   were reviewing their own chapters.
2 Q. Which were you responsible for; can you remember?
3 A. Chapter 2.
4 Q. So that was the slide that we saw earlier?
5 A. Yes.
6 Q. Can you recall what the need was or the requirement for
7   review of the audit process and tools was in
8   October 2011, what prompted it?
9 A. No, I don't know what prompted it.
10 Q. Can you recall whether there was an event, or was this
11   just a cyclical thing that happened every so often?
12 A. I think maybe because it hadn't been done since we had
13   taken over the audit side of things in the team. So it
14   was deemed it was in need of happening.
15 Q. I think we get a hint of that, if we go over a couple of
16   pages to page 3 of the document under "Introduction",
17   where Mrs Richardson says:
18   "The network support field team took over
19   responsibility for all POL financial and compliance
20   auditing in June 2008. In Jan 2009 a revision was
21   undertaken of all the audit process chapters, as a basic
22   starting point for the new ways of working using
23   a multi-skilled team of FSAs. However, the audit
24   processes and tools remained largely unchanged until
25   April 2010. Currently all of the audit process chapters

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1   are reviewed against an annual rolling timetable and are
2   the responsibility of the network services team
3   leaders."
4   Does that explain why this audit was being
5   conducted in October 2011 or not?
6 A. Yes, I think so, yes.
7 Q. What is this essentially saying is: we took over the
8   function in June 2008 and there hasn't been this
9   fundamental review until now?
10 A. Yes.
11 Q. Is that what it's saying?
12 A. Yes, I think so.
13 Q. Then the next sub-heading the need for a review:
14   "Since the initial revision of all audit chapters
15   in January 2009, business as usual operational changes
16   have been made. However, a complete review has not been
17   undertaken and there has been no proactive
18   identification or engagement with stakeholders to
19   ascertain that the processes and outputs are fit for
20   purpose and will deliver the business requirements."
21   You remember the answers you gave a moment ago as
22   to how the review of the audit was undertaken, and you
23   said that there was feedback from individuals. Who were
24   they?
25 A. Well, they would have been the stakeholders of the

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chapters, so weren't necessarily the same stakeholders for each chapter because each chapter obviously was a different area. So I think the team leaders were asked to contact the stakeholders and to get their feedback on the process that we were currently using for whatever chapter it was and if it was meeting their requirements.

Q. When you refer to stakeholders, who are you referring to?

A. The people who were responsible for the area of that particular chapter. For example, somebody in compliance, for the compliance chapter there would be -- you know, they would be a stakeholder.

Q. So, if we go forwards to page 7 of the document under "Stakeholders' Approach for Feedback", under the heading "Directorates", do you mean the person listed against each of the names there?

A. Yes, yes.

Q. For each of the directorates listed there?

A. Yes, yes.

Q. And which of those was yours?

A. I don't think we -- I can't remember actually, because chapter 2 was a tool rather than a process. So I think that if -- so it was -- because it was a tool, it was -- I suppose the team were the stakeholders, the people who

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used the tool.

Q. So under "Other Stakeholders", network services, field support team, regional managers, team leaders, field support advisers, scheduling and admin team, and field change adviser, that's in fact you, isn't it?

A. Yes.

Q. They would be the people that would give you feedback to allow you to make any necessary changes to your chapter; is that right?

A. Yes, yes.

Q. You see the list of the people on the right there, approached for feedback: Julia Marwood, Paul Meadows, Tracy Marshall, Susan Crichton, Paul Martin, and Dawn Brookes.

Can you recall whether any feedback was given by them about problems in the now 11-year operation of Horizon in the field, by way of errors, bugs and defects?

A. No.

Q. That's something that never occurred to you in this 16-year period at all? When I say occurred to you, was said to you in this 16-year period at all?

A. No.

Q. Can we go back to the issue of balancing, please -- that can come down from the screen, that document -- and look

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at POL00034184. If we can just familiarise ourselves with the document, do you recognise this?

A. Yes.

Q. Can you tell us what it is, please.

A. It's what we used to call the balancing handout.

Q. We can see at the foot of the page that it's dated April 2013, so after the audit that was just conducted. Who was it handed out by, and who was it handed out to?

A. It was handed out by trainers. I think we handed it out as part of the training course, as in the classroom training, and that the on-site trainers would have access to copies, if a new entrant once finished in their classroom didn't have it on site.

Q. And were you responsible for some of the content of this document?

A. Yes.

Q. Did you write it?

A. No.

Q. In what way were you responsible for the content of the document?

A. Just making sure that, if any changes were made to the procedure, they were then updated onto the handout and the person responsible for the handout updated it --

Q. I see.

A. -- accordingly.

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Q. So the level of responsibility you described to us right at the beginning of the session today, ensuring consistency, readability and no grammatical error, that kind of responsibility?

A. Yes.

Q. If we look at page 2 of the document, please, there is some guidance on dealing with discrepancies. We can see that at the foot of the page, that last point under "Rollover". Just before we get there, can you tell us how the document works by reference to those grey scaled boxes with words and numbers in them?

A. So they represented the buttons they pressed on Horizon.

Q. On the screen?

A. Yes, on the screen, yes.

Q. So they are essentially a printed depiction of a tile --

A. Yes.

Q. -- on the Horizon screen?

A. Yes.

Q. The pad?

A. Yes.

Q. And in relation to roll stock units, it reads:

"At the end of trading period the discrepancy settlement screen appears on the last stock to roll over into next trading period. Horizon will ask how you are going to settle the discrepancy, i.e. cash, cheque or

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1   provide you with an option to settle the discrepancy
2   centrally if over £150. If this option is selected then
3   you will receive a statement from our accounting team in
4   Chesterfield which provides you with the option of
5   paying by credit or debit card. If the discrepancy is
6   due to a known specific error made at the branch, then
7   contact MBSC with the details to enable further
8   accounting investigations to be made and appropriate
9   accounting corrections to be issued."
10   Are you familiar with that part of the process, or
11   were you familiar with that part of the process?
12   **A.** Not particularly.
13   **Q.** What do you recall about it?
14   **A.** I know that what is detailed on here would have been --
15   as far as I'm aware, was taken from the operations
16   manuals, so the manuals that the counter -- that the
17   branches were able to access to get the full procedures.
18   I'm not really familiar with the process.
19   **Q.** Here provision is made, we can see, for where there is a
20   known error in the branch, i.e. where the subpostmaster
21   knows they have made a mistake.
22   **A.** Mmm.
23   **Q.** There's no provision for where Horizon makes a mistake?
24   **A.** No.
25   **Q.** Is that reflective of the fact that it wasn't believed

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1   that Horizon made mistakes?
2   **A.** I think so, yes.
3   **Q.** Were you aware of any process that enabled
4   a subpostmaster to challenge a balance as a result of an
5   error that he or she believed Horizon had made?
6   **A.** No.
7   **Q.** There was simply no provision for it?
8   **A.** Not as far as I'm aware, no.
9   **Q.** Can you remember any discussion of whether there should
10   be such provision?
11   **A.** No.
12   **Q.** Can we move forward a little still further into
13   May 2013 -- that document can come down -- and look at
14   POL00034208. If you forgive me, I just need to catch up
15   in the paper.
16   If we go to the penultimate page, page 3, can you
17   see at the foot of the page an email exchange to which
18   you're not copied. It's between Mr Parsons, Andrew
19   Parsons, to Gareth Jenkins copied to Simon Baker on
20   27 April 2013.
21   "Gareth, Attached is the Horizon Online help for
22   giro transactions. You'll see at the top of page called
23   [and then a character string is given] that the
24   subpostmaster is required to 'select to print the office
25   copy' of the giro daily report. This suggests that the

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1   printing of the branch copy of the daily report is not
2   automatic as previously thought but requires manual
3   input from the subpostmaster. Would you mind looking
4   into this and confirming the position (for both giro
5   deposits and giro withdrawals)."
6   Then go up the page, please. In fact, go up to
7   the previous page to the foot so we can see who the
8   email was from. It's a reply from Mr Jenkins back to
9   Mr Parsons copied to Mr Baker. Then forward a page:
10   "Andy, I've just had a play on our test
11   system ... It looks like the documentation is wrong.
12   What surprised me particularly was the fact that the
13   Post Office copy is actually printed out before the giro
14   slips. Simon, is it worth getting James to put together
15   a story board for this as he did for recovery? Also who
16   in POL should be updating the user guide? In
17   particular, there is no button to just print the Giro
18   deposits report. It is included in the counter daily
19   report ... is this old Horizon documentation? Though
20   it clearly say Horizon Online, I did think that the slip
21   was printed before the office report, but that could be
22   Horizon rather than Horizon Online."
23   Then go to the previous page, Simon Baker to Lin
24   Norbury:
25   "Who do I talk to to update Horizon

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1   documentation?"
2   Then up, Simon Baker again:
3   "Lin, are you able to get back to me? [so
4   a chaser] I would like to make sure your documentation
5   reflects reality."
6   Then from Simon Baker to Lin Norbury , now copying
7   in Craig Tuthill and Angela van den Bogerd:
8   "Craig, Angela, I think Lin might be out. Who
9   owns the Help content for the Horizon system?
10   Investigations found some errors that I would like to
11   get fixed."
12   Then over to the previous page, Lin, at the foot
13   of the page, thank you:
14   "Hi Simon. Further to our earlier conversation
15   I have struggled to identify an overall owner for
16   Horizon Online Help. I've spoken to Sandra McBride,
17   network change support adviser and she advises that,
18   when training identifies the need to change any
19   documentation, she approaches the specific product
20   manager."
21   Just stopping there, I don't suspect for a moment
22   that you remember this call.
23   **A.** No.
24   **Q.** Can you explain what you are recorded as advising there:
25   when training identifies the need to change any

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1   documentation, you approached the specific product
2   manager?
3 A. I think what I'm -- I would approach the product manager
4   if change -- mainly it was when changes were coming in
5   rather than retrospectively. But they owned the
6   product, so they would be the experts, if you like, on
7   their products. So, if we had any clarification needed,
8   then we would contact the product manager, and they
9   would also -- we also worked with them, as I said, when
10   changes were coming in, so that we could make the
11   changes in time for those changes, when they went live,
12   if you like, with our materials and things like that.
13 Q. We saw from the email exchange, summarising it I hope
14   fairly, that there was Horizon legacy material still in
15   the user guide for Horizon Online. I think that was the
16   nature of the email exchange.
17   Did you do anything as a result of that issue
18   being raised with you beyond explaining who had
19   ownership of Horizon Help?
20 A. No, not as far as I recall, no.
21 Q. Whose responsibility was it to correct that kind of
22   thing?
23 A. I suppose once -- whoever was responsible for Horizon
24   help. So I've identified it as being the product
25   manager -- well, that's who we would contact regarding
77

1   products. So whoever was responsible for the
2   maintenance of Horizon Help, who I don't know who that
3   was -- I can't remember who that was.
4 Q. So your answer is --
5 A. Although Julia says it is the product manager.
6 Q. Yes. I mean --
7 A. Yes.
8 Q. Lin Norbury continues:
9   "I've also spoken to Julia Marwood."
10   Who was she?
11 A. She might have been the head of the training team at
12   that point. She was at one point.
13 Q. "... and she has confirmed that each product manager is
14   responsible for the content of their respective pages
15   within the Help menu, but that it is less black and
16   white when it involves issues around general accounting.
17   Within her network team she has managers that face up
18   the different product areas, and Stephanie Rush is
19   responsible for engagement with the banking team which
20   is where this particular query lies. As to an overall
21   owner I will keep making enquiries."
22   Can you add anything else to this exchange beyond
23   what you've said already?
24 A. No.
25 Q. Okay, I'll move on.
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1   That document can come down, thank you.
2   In your statement you give some evidence that you
3   have limited recall of feedback that was provided by
4   stakeholders. Can we look at a document, please, that
5   does record some POL00033423. Are you familiar with
6   this document?
7 A. Yes, it was part of the documents that you sent to me to
8   review.
9 Q. We can see a date of it at the foot of the page as
10   April 2011 and we can see, I think, your name, your
11   maiden name, as you were the author of it?
12 A. Yes.
13 Q. And do you recall now writing it?
14 A. Yes, vaguely.
15 Q. What was the purpose of it?
16 A. Well, it's reviewing the post transfer visit, PTV, to
17   get feedback from subpostmasters.
18 Q. So three months into the job; is that right?
19 A. I think it was three months, yes.
20 Q. Why is it called a post transfer visit?
21 A. I don't know. It was a visit that was arranged after
22   the subpostmaster had been in post for X amount, about
23   three months. I don't know exactly why it was called
24   that, to be honest.
25 Q. What were they transferring from and to?
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1 A. It was from when they transferred -- so a transfer is
2   when a postmaster takes over a branch.
3 Q. So this whole exercise is about people who have moved
4   branches?
5 A. So, it's a new -- it would be a new postmaster.
6 Q. As well. So they haven't moved branches, they are new
7   into a branch?
8 A. No. So they are transferring from the old postmaster to
9   a new postmaster.
10 Q. I see.
11 A. So that's what the transfer -- it was called a transfer.
12 Q. So this would incorporate old and experienced
13   subpostmasters who happened to have moved branches, no?
14 A. No.
15 Q. Only new entrants?
16 A. New subpostmasters.
17 Q. Okay.
18 A. So when a new subpostmaster went into a branch, bought
19   a branch, a shop with a post office in, they would
20   transfer. It was just called a transfer from the old to
21   the new. So it was from the day they took over the
22   branch, that was a transfer.
23 Q. You say in this document following the training review
24   feedback was sought from new agents that three-month
25   post transfer visit. What does "agents" refer to there?
80

1　　**A.**　Postmasters.

2　　**Q.**　Does it refer to any counter staff as well or not, or is

3　　　　it only subpostmasters?

4　　**A.**　No, it would be just subpostmasters.

5　　**Q.**　And why are they called agents? What's the --

6　　**A.**　Again, the terminology changed over the years of what

7　　　　subpostmasters were referred to as. So the common one

8　　　　was subpostmasters, but they were also referred to as

9　　　　agents.

10　　**Q.**　Looking at the questions asked and answered, question 1:

11　　　　　"Do you feel you have had sufficient training to

12　　　　enable you to process all Post Office transactions?"

13　　　　　Only 76 per cent said yes. Was that regarded as

14　　　　a low figure?

15　　**A.**　No.

16　　**Q.**　Why? What was taken from that then? Was that regarded

17　　　　as evidence of sufficiency or success of training?

18　　**A.**　Well, there was only 88 responses, I think it says at

19　　　　the top there.

20　　**Q.**　Yes.

21　　**A.**　So I think that was felt that that was a positive

22　　　　figure. I don't think we had a target. You know, we

23　　　　weren't expecting 100 per cent yeses or noes.

24　　**Q.**　I can understand that that you wouldn't expect

25　　　　100 per cent -- was there not a target, a metric by

81

1　　which successful training could be measured by reference

2　　to feedback?

3　　**A.**　Not that I recall.

4　　**Q.**　Question 2:

5　　　　　"Which transactions do you feel most confident in

6　　dealing with?"

7　　　　　34 per cent of answers included AP and banking

8　　transactions; 33 per cent included mail transactions;

9　　24 per cent included all transactions; 14 per cent

10　　included daily or regular transactions; 5 per cent

11　　included the basic transactions.

12　　　　　Then, by contrast:

13　　　　　"Which do you feel least confident in dealing with

14　　and why?"

15　　　　　You'll see the answers there: 4.5 per cent

16　　answered:

17　　　　　"Balancing."

18　　　　　Then over the page, please, sorry to the next

19　　page:

20　　　　　"Do you feel you've had sufficient training to

21　　enable you to prepare the office balance?"

22　　　　　72 per cent answered yes. Again can you remember

23　　what was taken from that, that 72 per cent -- admittedly

24　　a relatively small sample of 88 -- felt confident in

25　　preparing the office balance?

82

1　　**A.**　I would think -- I can't remember exactly, but I think

2　　　　that we thought we were probably on the right track, you

3　　　　know, what we were providing was sufficient for -- you

4　　　　know, it was a good response, I think, really.

5　　**Q.**　Again, why would that be taken as a good measure of

6　　　　success?

7　　**A.**　I suppose because it wasn't the other way round, that it

8　　　　wasn't 22 per cent said they were -- you know, they had

9　　　　sufficient training.

10　　**Q.**　And then question 6, please:

11　　　　　"In which area of the Post Office operation do you

12　　　　feel least confident and why?"

13　　　　　It seems that people didn't include a why answer.

14　　　　17 per cent felt least confident in balancing.

15　　　　　Then question 8, at the foot of the page:

16　　　　　"Are there any areas where you feel you need more

17　　　　training or support?"

18　　　　　18 per cent felt they needed more training in

19　　　　balancing and the trading period.

20　　　　　Can you help us as to whether anything was taken

21　　　　from this customer feedback, that there was

22　　　　a significant minority of individuals who felt that the

23　　　　training they had received on balancing was inadequate

24　　　　and they wished for more of it?

25　　**A.**　No. I think the -- further down the page --

83

1　　**Q.**　Is set out your analysis?

2　　**A.**　Yes.

3　　**Q.**　If we go to page 5.

4　　**A.**　We did -- what our response was to feedback.

5　　**Q.**　Scroll down, please. There's your narrative explaining

6　　　　the result. You say:

7　　　　　"From the above results the majority of new agents

8　　who completed the feedback questionnaire feel that they

9　　have received sufficient training to enable them to

10　　process transactions and prepare the office balance."

11　　　　　That of course is statistically correct because

12　　a majority did, more than 50 per cent did.

13　　**A.**　Yes.

14　　**Q.**　But can you remember why the 72 per cent figure was not

15　　seen as a concern?

16　　**A.**　No, I don't.

17　　**Q.**　Seen by you as a concern?

18　　**A.**　No, no, I don't recall.

19　　**Q.**　Because it's close to a third of individuals not feeling

20　　they've received sufficient training to enable them to

21　　prepare transactions and prepare an office balance.

22　　**A.**　I think -- no, I don't know.

23　　**Q.**　At the foot of the page:

24　　　　　"Half of respondents felt they didn't need any

25　　further training or support. From those who did feel

84

1   they needed further training or support 18 per cent
2   replied that they required further [over the page,
3   please] training in the weekly and TP balances."
4   Can you remember what was done as a result of
5   that?
6 A. Well, only from what it says here:
7   "As part of the new training offered the agent
8   receives coaching on (... read sotto voce ...) they are
9   assessed on the quality of their conversations."
10   That doesn't relate to that, does it?
11 Q. No. I can't see anything that relates to the balancing
12   issue that has been pulled up from --
13 A. I'm sorry, no, I don't know then. Sorry.
14 Q. We've heard some evidence in the Inquiry that, in the
15   testing stage of Horizon in the late '90s, in the
16   acceptance phase of Horizon, when Horizon was being
17   tested against some contractual provisions to determine
18   whether the Post Office should agree that the project
19   could proceed further to national rollout, and in the
20   course of national rollout concerns were expressed by
21   subpostmasters about the balancing process, and here
22   a decade on there is a significant minority of people
23   saying that they have issues or concerns with the
24   balancing process. It's one of the top concerns of
25   those that expressed a view.

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1   Can you recall whether this was escalated within
2   the Post Office or not?
3 A. No, I can't.
4 Q. Who would this report have gone to?
5 A. This one? My line manager.
6 Q. Who was?
7 A. I think it would have been Sue Richardson.
8 Q. Still at April 2011?
9 A. Possibly, and I don't know where else it would have
10   gone.
11 Q. Were you aware of the things that I've just mentioned,
12   that concerns had been consistently expressed by
13   subpostmasters and others in testing acceptance and
14   rollout over balancing?
15 A. No.
16 Q. So for you this was just a standalone analysis of 88
17   responses to a request for feedback?
18 A. Yes.
19 Q. Thank you. Then turning to the end of your time in the
20   Post Office, please, can we look at POL00088953.
21   I think we can see you are a recipient of this
22   email in January 2015 from Simon Drinkwater. You're
23   second in the distribution list.
24 A. Yes.
25 Q. So this is a year or so before you take redundancy?

                    86

1 A. Yes.
2 Q. Mr Drinkwater, if we just scroll down a little bit, we
3   can see he was part of business transformation. Do you
4   remember him?
5 A. Yes.
6 Q. Can you remember what role he performed in business
7   transformation?
8 A. No.
9 Q. He says:
10   "Hi everyone. Natalie Liff ..."
11   Is that field support adviser again?
12 A. Yes.
13 Q. " ... has worked on producing a quick guide to balancing
14   for postmasters who have a loss or gain. See attached.
15   This has been produced because there doesn't seem to be
16   a clear process to follow in the event of a misbalance."
17   Do you know why it was that, 15 years after the
18   introduction of Horizon, there wasn't a clear process to
19   follow in the event of a misbalance?
20 A. No, I don't.
21 Q. If we look at the top of the page, please, and look at
22   the distribution list there, could you talk us through,
23   if you know, what role those people were performing at
24   this time. So Sue Richardson?
25 A. She was my line manager.

                    87

1 Q. So her title and role would be?
2 A. I can't remember her title at the time.
3 Q. Her role would be?
4 A. I think it was projects, something projects manager.
5   I can't remember exactly the title. Her role -- well,
6   no, I don't remember. I should remember, but sorry.
7 Q. Jackie Newton?
8 A. She was training, something to do with training, but
9   I can't remember her full role.
10 Q. Angela van den Bogerd?
11 A. Higher up but I don't know exactly her role.
12 Q. Craig Tuthill?
13 A. I know the name -- I can't remember his title and role.
14 Q. Ann Allaker?
15 A. I'm not going to be very helpful here, sorry.
16 Q. Cutting things short, for the remainder of the people on
17   the To list, is there anyone you recognise and the job
18   that they did?
19 A. I recognise my husband's name Drew McBride and his role
20   at the time. I can't recall actually exactly the title.
21   He was head of something. I should know that. Sorry,
22   Drew.
23   Then there's Natalie Liff, who was the FSA who
24   produced the handout. Chris Gilding --
25 Q. We know.

                    88

1   A.   Yes.
2   Q.   And Tim Gordon Pounder?
3   A.   He's FSA similar to Natalie.
4   Q.   Of the people mentioned in that distribution and copy
5   list, did any of them have responsibility for or
6   connections to investigations?
7   A.   I don't know. I don't think so, but I don't know.
8   Q.   We've seen that the email says that there doesn't seem
9   to be a clear process to follow in the event of
10   a misbalance, and then a series of questions are asked
11   by reference to the document that's attached a quick
12   guide to balancing, and four questions are asked.
13   Can you recall whether you answered them?
14 A.   No, I don't recall.
15 Q.   You can't recall whether you answered any of these
16   questions or not?
17 A.   I think I would have done. If we were asked to respond,
18   then I would have responded. But I don't recall what
19   I said.
20 Q.   If we go over the page, please, I think this is the
21   document that was described as the quick and easy guide
22   to balancing. Can you recall whether you regarded this
23   as a quick and easy or clear and easy process to follow
24   for a subpostmaster to reconcile his or her cash and
25   stock on Horizon as at 2015?

1   A.   From reading it, it looks straightforward enough to me,
2   but I don't have enough Horizon experience to know
3   whether in practical terms that would have been an easy
4   guide to follow.
5   MR BEER: Thank you. Those are the only questions that
6   I ask, Mrs McBride. There may be some questions from
7   others starting -- no? No, thank you very much. Those
8   are all of the questions that you are to be asked.
9   Thank you.
10 A.   Thank you.
11 SIR WYN WILLIAMS: Well, Mrs McBride, thank you very much
12   for coming to the Inquiry and for answering a good deal
13   of questions this morning. I'm grateful to you. Thanks
14   again.
15 A.   You're welcome. Thank you.
16 MR BEER: Sir, we're not sitting this afternoon or, tomorrow
17   and so the Inquiry reconvenes at 10 am on Thursday.
18 SIR WYN WILLIAMS: Fine, all right. Thank you very much.
19   See you then. Goodbye.
20 MR BEER: Thank you, sir.
21 (12.45 pm)
22   (Adjourned until Thursday, 19 January at 10.00 am)
23
24
25

MR BEER: [11] 1/3 1/5 19/14 42/1 49/8 49/12 49/16 49/18 90/5 90/16 90/20

SIR WYN WILLIAMS: [9] 1/4 1/6 41/17 41/22 41/25 49/11 49/17 90/11 90/18

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'86 [1] 13/4
'90s [1] 85/15
'93 [1] 3/10
'97 [1] 4/20
'select [1] 74/24

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... [5] 36/15 40/4 45/13 75/11 87/13
... because [1] 40/4
... has [1] 87/13
... through [1] 45/13

1

10 [2] 22/20 90/17
10.00 [3] 1/2 51/1 90/22
100 per cent [3] 4/18 81/23 81/25
11 [2] 23/10 39/6
11-year [1] 70/16
11.19 [1] 49/13
11.20 [1] 49/8
11.35 [1] 49/15
12 [3] 39/20 45/19 52/16
12 December 2022 [1] 1/22
12.30 [1] 51/12
12.45 pm [1] 90/21
13 [1] 40/15
14 per cent [1] 82/9
15 [1] 15/19
15 February 2016 [1] 33/2
15 pages [1] 1/22
15 years [1] 87/17
150 [1] 73/2
16 years [3] 9/3 15/19 42/4
16-year [3] 42/23 70/21 70/22
1600 [1] 51/24
17 [2] 1/1 12/6
17 per cent [1] 83/14
18 per cent [2] 83/18 85/1
19 January [1] 90/22
1986 [1] 2/9
1993 [1] 2/19
1997 [1] 3/13

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200 [2] 29/7 31/3
2000 [8] 5/3 6/1 9/5 9/24 10/1 15/15 25/17 42/4
2002 [5] 28/18 54/12 54/18 58/11 58/14
2008 [13] 15/22 16/1 16/1 18/12 22/6 22/10 41/12 41/14 41/15 41/20 55/24 67/20 68/8
2009 [2] 67/20 68/15
2010 [3] 20/17 27/20 67/25
2011 [10] 22/1 24/18 24/19 25/4 65/19 65/22 67/8 68/5 79/10 86/8
2012 [2] 39/23 50/13
2013 [3] 71/7 74/13 74/20
2015 [2] 86/22 89/25
2016 [9] 2/12 9/6 15/17 25/12 25/17 32/22 33/2 34/14 58/23
2022 [1] 1/22
2023 [1] 1/1
21 [1] 13/8
22 per cent [1] 83/8
22.50 [4] 60/5 61/4 61/7 61/9
22H [3] 60/3 60/12 61/16
24 per cent [1] 82/9
27 April 2013 [1] 74/20
27 November 2002 [1] 28/18
28 September 2011 [1] 22/1
28/22H [1] 61/16

3

3.2.1 [1] 29/1
3.2.2 [1] 30/4
32 [2] 37/6 37/7
33 per cent [1] 82/8
34 per cent [1] 82/7
35 [1] 49/10

4

4.5 per cent [1] 82/15
46 [1] 18/7

5

5 per cent [1] 82/10
5.30 [1] 51/3
50 [5] 45/20 46/3 46/4 48/4 48/13
50 per cent [1] 84/12

53 [1] 21/24

6

6.00 pm [1] 51/11

7

7.00 [1] 51/1
72 per cent [3] 82/22 82/23 84/14
76 per cent [1] 81/13

8

8.30 [1] 51/10
82 [6] 60/5 60/24 60/24 61/5 61/5 61/9
88 [3] 81/18 82/24 86/16

9

9.00 [1] 51/3

A

able [14] 13/22 14/2 14/9 16/17 31/1 35/22 36/7 37/18 37/19 42/16 51/4 61/23 73/17 76/3
about [26] 2/6 2/25 5/4 14/5 15/22 16/21 23/16 24/4 28/6 28/8 32/20 40/12 42/23 43/3 43/9 45/25 46/25 49/22 54/11 55/20 61/15 70/16 73/13 79/22 80/3 85/21
above [1] 84/7
absolutely [3] 46/15 46/22 47/11
accept [1] 45/5
acceptance [2] 85/16 86/13
access [2] 71/12 73/17
accommodation [2] 14/2 14/5
accordingly [1] 71/25
accounting [6] 43/23 46/18 73/3 73/8 73/9 78/16
accounts [2] 24/9 24/12
accurately [1] 54/17
acknowledge [1] 44/3
Across [1] 63/16
act [1] 44/19
actual [3] 27/9 62/12 62/15
actually [6] 8/16 13/4 48/4 69/22 75/13 88/20
add [1] 78/22
added [2] 27/15

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adding [1] 44/24
additional [4] 31/8 40/22 52/25 54/3
address [1] 43/13
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