Witness Name: Jonathan Evans

Statement No.: WITN0346 01

Exhibits: WITN0346_01/01 -

WITN0346 01/18

Dated: 16 September 2022

POST	OFFICE	HORIZON	ΙT	INQUIRY

FIRST WITNESS STATEMENT OF JONATHAN EVANS

I, JONATHAN EVANS will say as follows:

This written witness statement has been drafted in response to the Rule 9 Request dated 27 May 2022, with supplementary letters dated 17 June 2022 and 5 July 2022, regarding corporate knowledge of technical issues with Horizon prior to roll-out.

Professional background, relationship with POL, role at POL particularly between 1999 and 2001

2 The Inquiry has asked me to set out my professional background and relationship to POL and to summarise my role at POL between 1997 to 2001. I was employed

by The Post Office, (from 2001 by Consignia plc, and from 2003 by Royal Mail Group plc, following company status and name changes), between 1974 and 2010. I joined The Post Office as a graduate trainee having obtained a degree in mathematics at Durham University. In brief, my Post Office career followed this path:

1974 – 1976	Management Trainee, mainly in postal operations
1976 – 1982	Operations Executive, Midlands Postal Board
1982 – 1984	Personal Assistant to The Post Office Chairman
1984 – 1986	Assistant Head Postmaster, Leicester
1986 – 1989	Subpostmasters Manager, Post Office Counters HQ
1989 – 1992	Deputy Personnel Director, Post Office Counters HQ
1992 – 1993	Director of Organisation, Post Office Counters HQ
1993 – 1995	General Manager Midlands Region, Post Office Counters
1995 – 1999	Network Director, Post Office Counters HQ
1999	Director of Shaping for Competitive Success Programme (Post
	Office reorganisation)
1999 – 2001	Secretary to The Post Office
2001 – 2010	Company Secretary of Consignia plc, then Royal Mail Group plc

Post Office Counters Ltd, a subsidiary company of The Post Office, came into existence in 1987 as part of the strategy to give dedicated focus to the management of the UK's then 20,000 or so post offices. Following the dissolution of The Post Office in 2001 and the creation of Consignia plc (subsequently renamed as Royal Mail Group plc) Post Office Counters Ltd (POCL) changed its

name to Post Office Ltd (POL) on 1 October 2001, marking a further degree of separation from Royal Mail. 10 years later the complete separation of POL from Royal Mail took place when the latter was privatised, leaving POL in Government ownership.

- My relationship with POL in the period about which I have been asked to comment – 1997-2001 - was limited. When POL came into being in October 2001, I was Company Secretary of the whole Group and of its main subsidiaries – and therefore also of POL. The main focus of my role as Group Company Secretary was working on Group-wide matters with the Chairman, Chief Executive and other directors on the main board. My involvement with POL was mainly in the area of board governance.
- However, as my career history shows, between 1986 and 1999 my work was with POL's predecessor company, POCL, predominantly in the areas of general and personnel management. My role as Subpostmasters Manager was to take the lead on the contractual relationship between POCL and subpostmasters. This involved considerable dealings with the National Federation of SubPostmasters (NFSP) in negotiating remuneration and other contractual issues. From 1989 as Deputy Personnel Director, I had a wider role in charge of employment relations with staff and subpostmasters. In 1992 I led a major reorganization of Post Office Counters, later becoming General Manager of the newly created Midlands Region with 1500 or so post offices, before returning to London HQ as Network Director, with responsibility for the operational performance of the whole network of post offices across the UK.

Experience of major IT projects

The Inquiry has asked me to summarise my experience in respect of major IT projects. My experience with major IT projects is and was limited to that of an enduser.

Automation Transformation Steering Group

- The Inquiry has asked me to explain the purpose behind the Automation Transformation Steering Group and whether the Group considered the technical robustness of Horizon. The Automation Transformation Steering Group was a POCL-wide group set up in 1996 to oversee the integration of the many and varied IT systems and programmes across POCL covering not just Horizon but also other areas such as logistics, accounting and the interface with Group-wide IT systems. There was a large programme of IT activity in POCL, and it required carefully coordinated implementation and communication. The Steering Group's role was not to probe the technical integrity and robustness of Horizon (or of other IT projects) that was done by respective project governance groups but to keep a close overview of their progress and integration with other POCL IT systems. The terms of reference of the Group are at Appendix B in POL00031271 [WITN0346 01/1].
- 8 The minutes of the meeting on 23 June 1998 (**POL00028324** [WITN0346_01/2]) show the type of agenda and discussion at meetings of the Group.

Early feedback on Horizon implementation

- The main Post Office Board received regular progress reports on Horizon, and the follow-up report on which I have asked to comment (POL00028593 [WITN0346_01/3]) fulfilled a request from the Group Chief Executive, following the Board meeting in June 1997, for a detailed report on learning points arising from the Horizon programme thus far. The background to this was slippage in the roll-out timetable and the need to understand the causes of this.
- 25 years on, I do not have an exact recall of my understanding at the time of the causes of slippage, but two points come to mind now. The first was the difficulties that ICL/Pathway was having in developing its software for handling the full range of benefit payments (whether this was predominantly an issue to be laid at the door of Pathway or the Benefits Agency was, I recall, a contentious matter). The second area, which at the time would have been my main concern as Network Director, was the array of issues arising from the installation of the Horizon hardware in subpostmasters' premises and changed transaction processes items such as office layout constraints, power supplies, training, remuneration arrangements.
- 11 The minutes of the joint meeting with ICL/Pathway, POCL and the NFSP held on 28 May 1997 (NFSP00000279 [WITN0346_01/4]) on which I have been asked to comment, show the type of matters that were concerning subpostmasters in the trial offices. I do not recall this particular meeting and am not even sure that I was

present at it, but together with colleagues from other parts of POCL I did have frequent meetings – formal and informal – with NFSP representatives to try to iron out practical implementation problems, and for them to give feedback on how the roll-out – limited at that stage – was progressing. At that time there was limited functionality on the Horizon system, so the main feedback areas, as mentioned above, were regarding hardware installation and the length of automated transaction times.

Horizon testing

12 The inquiry has asked me about my understanding of the results of Model Office and End to End testing and POCL and ICL Pathway's actions to address these issues. The document to which I have been referred (POL00028421 [WITN0346_01/5]) is a short briefing note dated 16 November 1998 from POCL's leader of Horizon implementation to his colleagues on the Counters Executive Committee, of which I was one, alerting us to potential problems with the interface between Horizon and the Transaction Information Processing (TIP) project. 24 years on, I have no recollection of receiving or reading this note and cannot answer the specific questions asked by the Inquiry. However, I do hazily recall that problems had been encountered in the preparation for carrying out tests on the Horizon system. Horizon was being designed to provide streams of information about client transaction volumes and receipts etc from the cash accounts of post offices for TIP to produce consolidated information for client settlement and management information purposes. I think – although others closer to the problem would know better than me – that these issues would not have affected

subpostmasters. The Inquiry has asked me whether such issues were brought to the attention of the Government. The document shows that the problems were being taken up with ICL/Pathway and that Government officials would have been aware.

Treasury Review of Horizon

- The Inquiry has asked me a number of questions about the role and activities of the Treasury Working Group of which I was a member during some of its existence. I believe the first inter-Government Departmental working group to review the Horizon project was established in early 1998, when the Horizon project was flashing red on the political radar screen in view of the significant timetable slippage and growing contractual disputes between the three main parties ICL, the Benefits Agency (BA) and POCL. This review concluded that Horizon was still feasible, but that its continuation would depend on the contract with ICL being renegotiated. Negotiations then took place between the parties, led by Graham Corbett, then a senior official in the Monopolies and Mergers Commission, but by the Autumn of 1998 it was recognised that agreement would not be possible.
- 14 To try to make progress, ICL and POCL separately attempted to reach an agreement on a new contract. While these discussions took place, Ministers requested work to be carried out on contingency options. The Treasury Working Group (TWG) was assigned this task, and I joined it as the Post Office representative. Other members were from the Treasury (HMT), the Department of Social Security (DSS), BA, and the Department of Trade and Industry (DTI). The

TWG liaised with other Government departments, including No 10, the Central IT unit, and law officers, was advised by consultants KPMG and the legal advisers of the individual member organisations. In my capacity as POCL Network Director, my role was primarily to provide analysis of and commentary on the consequences for the post office network of Horizon not going ahead, and the impact of the contingency options. Document **POL00028642** [WITN0346_01/6] shows the type of input I made.

- The documents provided to me by the Inquiry provide a good illustration of the nature of the work carried out by the TWG, and of the tensions between the various parties which had existed for years before. Horizon had been created as a means of accommodating two competing Government objectives one being the modernisation of the old paper-based methods of paying state benefits, which in the eyes of DSS and BA should be paid via Automated Credit Transfer (ACT) direct into beneficiaries' bank accounts thereby saving millions of pounds in administration and fraud; with the other objective being the maintenance of a nationwide network of post offices, which would be torpedoed by the loss of Benefits Agency income as it accounted for over one third of POCL's total revenues.
- In essence, BA wanted to move to ACT quickly, while POCL wanted to avoid this, or at best to slow it down. The original design of Horizon, with the Benefits Payment Card (BPC) at its heart, was the compromise to accommodate these objectives a modern, automated means of paying state benefits in post offices, reducing fraud and administration costs, whilst preserving business and customer

footfall in post offices. It is important to remember here that there was a further, potentially vocal, constituency with a vital interest in all this – the 18,000 or so subpostmasters, whose livelihoods would be threatened by the loss of income caused by the move to ACT. It was no coincidence that the then Government in the mid-1990s announced its commitment to Horizon and the BPC at the annual general meetings of the NFSP.

17 But the Horizon project faltered. In 1998, important milestones had been missed, and disputes were arising between the parties about the causes of this, in particular between ICL and BA. As mentioned in paragraph 10 above, I was unsure at the time of the root causes of this - my memory recalls doubts about ICL's ability to deliver its commitments, particularly in respect of software development, tempered by other doubts about BA's ability to redesign its systems and processes to accommodate Horizon¹.

18 The TWG set to work on analysing three main options:

- 1) to continue with Horizon as planned, with a renegotiation of contractual terms
- 2) to continue with Horizon but reconfigure it to operate without the BPC and provide an automated platform for post offices, with an early facility for network banking. Benefit payments would be made via ACT
- 3) to cancel Horizon entirely.

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¹ For a full analysis of the issues affecting Horizon at this stage, I would commend to the Inquiry the National Audit Office's 2000 report on *The Cancellation of the Benefits Payment Card project*.

- 19 Each option was analysed from financial, legal and political viewpoints. The documents show the range and extent of the analysis the TWG involved itself in, and the nature of the debate between its members. The TWG review inevitably resulted in reopening the Pandora's box of arguments about the colliding objectives of the Benefits Agency and POCL ie ACT v post office network. I draw the Inquiry's attention to a few of the documents which give a flavour of the discussions as per the Inquiry's questioning:
 - 1) POL00039877 [WITN0346_01/7] and POL00039876 [WITN0346_01/8]: these throw some light on the respective positions of DSS/BA and DTI/POCL
 - 2) **POL00028638** [WITN0346_01/9]: KPMG's analysis of the three options which shows, despite the rigour of their analysis, the lack of a clear conclusion on which was the best option
 - 3) POL00028634 [WITN0346_01/10]: my note to the Post Office Chief Executive about the presentation the TWG was to make to Ministers in December 1998. The presentation was designed to inform Ministers of a possible 'agreed' way forward to accommodate the competing objectives i.e., to follow option 2 by continuing with Horizon without the BPC, implementing a network banking facility in post offices, and delaying the introduction of compulsory ACT for a few years. This was of course all subject to agreeing on new terms with ICL. The presentation to Ministers (six Ministers were present, including at least three Cabinet members) was made jointly by TWG members (I was the Post Office contributor) in order to portray a sense of agreement, but the underlying

different preferences of the parties – DTI/PO for option 1, DSS/BA for option 3 – nevertheless shone through. I do not recall a clearly stated outcome of the meeting but work subsequently continued on developing option 2 – although this was interrupted by a Government reshuffle as outlined in paragraph 25 below.

In response to other questions asked of me by the Inquiry about the workings of the TWG

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1) It was not part of the TWG's role to explore detailed technical issues concerning the Horizon project (by which I assume is meant, for example, the reasons why the coding of software development was proving troublesome). While the risk of Horizon failing was clearly recognised – indeed that was the catalyst for our work – the TWG was not equipped, nor needed to be equipped, to investigate technical issues. This level of scrutiny was carried out by other groups, mainly in the Horizon project team reporting to POCL and BA. One point to add here: I recall that as Horizon was a Private Finance Initiative (PFI) project, ICL had shown some reluctance for the contracting parties to probe its inner workings. Under PFI philosophy, it was for the client to specify requirements, and for the supplier to deliver them without being interrogated on its methodology. As slippage continued, this was a source of considerable tension between the parties.

- 2) I am not aware of the extent to which Government Ministers personally were briefed on the detailed technical aspects of Horizon. Were any briefing called for, it would have been the responsibility of officials in respective Government departments to provide it.
- 3) I was not directly involved in the negotiations with ICL at any time and have no recollection of the detail of their proposals for the Horizon project in November/December 1998, their proposed changes to the acceptance criteria for the system, or the extent of their acceptability to POCL or the Benefits Agency.
- 4) I was aware of contact between the Government and Fujitsu. POL00039932 [WITN0346_01/11] and POL00028692 [WITN0346_01/12] show there was an approach via the British Ambassador in Tokyo. I also recall that Fujitsu was seen as an important investor in the UK through its acquisition of ICL in 1998.
 I also recall that there had been the closure of a Fujitsu factory in or near Sedgefield, the then Prime Minister's constituency at about this time. But I am unable to comment on the extent to which these matters influenced, if at all, the outcome of discussions with ICL about a renegotiated contract.
- 5) My involvement with the TWG ceased in early 1999 when I was asked to take charge of a major reorganisation of the Post Office into separate business units, known as *Shaping for Competitive Success.* I continued with this programme until becoming Group Company Secretary (actually Secretary to the Post Office until incorporation in 2001) in October 1999.

Review of POCL deal with ICL Pathway

- 21 The Inquiry has asked me to consider the review (POL00031230) [WITN0346_01/13] of the proposed deal with ICL/Pathway, to comment on its purpose, my involvement with it, and the extent to which I agreed with its conclusions. The review was carried out by Roger Tabor, the very experienced and well-respected Finance Director of POCL, who had not been directly involved with the progress of the intense discussions over the few months prior to his report. I now have little recollection of his conducting this review or of my involvement with it, but it would have been, as he states in his opening paragraphs, to give a more detached view of the emerging 'deal' to be done with ICL/Pathway. (While 'deal' is mentioned here, this must mean the draft Heads of Agreement which had been worked up between POCL and ICL, but which had not received approval from DSS/BA. In fact, as Roger mentions in his report, at the time of writing it the Heads of Agreement had lapsed).
- 22 My views at the time would have echoed those of 'senior managers' mentioned in paragraph 2.6 of the review. Given the background of poor delivery to date, there was every reason to be cautious about a future deal with ICL. But there was no easy solution out of the Horizon problem at the time: we were all recognising that we had to face the least bad deal, with open eyes.
- 23 I would have endorsed the conclusions reached in paragraphs 3.4 3.6 of the review. As mentioned above in paragraph 20(1), the PFI nature of the contract

was a problem: the resultant lack of transparency with ICL was a major factor in impeding the joint identification of risks and their effective mitigation.

Cancellation of the Benefits Payment Card

- 24 The Inquiry has asked me about the position of the Post Office regarding the options identified by the TWG. As mentioned in paragraph 20(5) my involvement with the TWG ended in early 1999. My understanding was that the three options continued to be explored, with most attention given to option 2 (continue with Horizon with the BPC, and accelerate post office network banking) as this was seen within Government as the best possible 'third way' compromise position. The Post Office continued to stress that option 1 to continue with Horizon as planned but renegotiated was its preferred option. DSS continued to press the advantages of moving quickly to ACT.
- However, not long after the presentation to Ministers I described in paragraph 19(3) above, there was a reshuffle of Government Ministers following the resignation of Peter Mandelson, then Secretary of State at the DTI. As a result, there was a new head at the DTI, and a new Chief Secretary at the Treasury two cabinet ministers closely involved with the Horizon issue. My recollection is that these changes caused, perhaps inevitably, a delay in Government coming to a consensus as to the way forward as Ministers took over their new portfolios. My understanding was that in order to make progress No 10 was asked to provide guidance. I am not sure whether the Prime Minister was personally involved, although POL00028603 [WITN0346_01/14] suggests that he may have been.

However, it would seem inconceivable that the decision about Horizon would not have received Prime Ministerial attention. The decision would have far-reaching impacts not only on the payment of state benefits to millions of people and the future of the post office network, but also on the commercial future of ICL, and the relationship with Fujitsu. The reputation of the Government was at stake.

- I mentioned in paragraph 20(4) that there was some direct contact between Fujitsu and Government in 1998. I am unaware now, and was unaware at the time, of the existence of any such contact out with the actual negotiations with Fujitsu/ICL in January-May 1999.
- 27 The Inquiry has asked me to detail the circumstances in which the Post Office signed Heads of Agreement with ICL, and what if any pressure was brought to bear by the Government in respect of this. Things came to a head in May 1999. Negotiations had taken place with Fujitsu/ICL, and draft Heads of Agreement had been produced, based on pursuing a variant of option 2. A big change was the removal of BA from the contract with ICL, leading to a more conventional non-PFI contractual arrangement between ICL and POCL. While the proposal included concessions from DSS/BA to defer the introduction of compulsory ACT for a few years, it was still financially problematic for the Post Office to accept. In the end and I was not directly involved but gleaned this at the time from those who were the Post Office Board agreed to the proposal because they believed that if they didn't, Ministers may well direct them to do so. In order to avoid that constitutional imbroglio, the Board reluctantly agreed to the proposal, managing to secure some concessions in return for their acceptance.

28 The Inquiry has asked for my understanding of the robustness and technical issues of Horizon at this time. As mentioned before, analysis of the detailed technical robustness of Horizon did not feature prominently in TWG discussions while I was involved (i.e. up to January 1999) – although the risk of ICL continuing to miss performance targets did. In retrospect, I suppose it was assumed that ICL would in the end deliver the goods, even if this meant that glitches along the way

would need to be corrected.

The Inquiry has asked me to comment on whether the financial implications of cancelling the project impacted the focus on the technical integrity and robustness of Horizon is an interesting question. My answer is that I do not know, but I will comment on a slightly different point. The removal of the BPC from Horizon was a major change. On the one hand I heard it described as making Horizon easier to implement as the considerable complexity of paying benefits had been removed. But on the other hand, as it was analogously described to me, Horizon had been designed to the equivalent specification of an army tank to handle securely £billions of public monies, whereas without the BPC only a nimble armoured car was needed. But the Post Office was left with a tank.

Discussions at certain Board meetings: Sept 1999 – June 2001

30 The Inquiry has asked me to comment on the minutes of four board meetings, in particular about my understanding at the time of the robustness of Horizon and of

any technical issues, whether I was aware of any problems experienced by subpostmasters, and whether I raised any concerns.

- Meeting of the Post Office Board on 14 September 1999: I first point out that although the minutes in document POL00000353 [WITN0346_01/15] were first sent to me by the Inquiry as "a Post Office Limited Board Member during the period 1999-2001", they are not minutes of POL (i.e. Post Office Limited, which, as I pointed out above in paragraph 3, did not come into being until 1 October 2001) but minutes of the board of The Post Office Corporation i.e. the main board of the whole group. I was present at this meeting as an observer: I had been appointed as Secretary to The Post Office (Corporation) and this was a familiarisation meeting for me before formally taking up the role the following month.
- 32 Despite re-reading these minutes, I have no recollection of the detail of the meeting perhaps understandably as it took place 23 years ago. I am therefore unable to say what my understanding was at the time of the robustness of Horizon.
 I note however that the minutes refer to concerns about the reliability of the Horizon software. I have no recollection of any technical issues being discussed.
 I note that the minutes do not record any such discussion.
- 33 I also have no recollection of anything being reported about problems for subpostmasters. I note from reading the minutes that there were some concerns about training (presumably of subpostmasters, amongst others). I have no recollection of raising any concerns. I was at the meeting as an observer. As

Secretary from the following month, it would have been my role to ensure that any concerns raised by board members were followed up. I have no recollection of doing this, although I see the minutes record one action point about Horizon which I would have ensured was reported on at the following meeting.

- Meeting of the Post Office Board meeting on 26 October 1999: I point out that the minutes detailed in document POL00000354 [WITN0346_01/16] are not minutes of the board of Post Office Limited, but of The Post Office Corporation. As before, despite re-reading these minutes, I have no recollection of the detail of the meeting. I am therefore unable to say what my understanding was at the time of the robustness of Horizon. I note from the minutes that Horizon had been accepted for implementation.
- 35 I have no recollection of any technical issues being discussed. I note that the minutes do not record any such discussion. I have no recollection of anything being reported about problems for subpostmasters. I note that the minutes do not record any such discussion. I have no recollection of raising any concerns.
- Meeting of the Post Office Board on 11 January 2000: I point out that the minutes in document POL00000336 [WITN0346_01/17] are not minutes of the board of Post Office Limited, but of The Post Office Corporation. As before, despite rereading these minutes, I have no recollection of the detail of the meeting. I am therefore unable to say what my understanding was at the time of the robustness of Horizon. I note from the minutes that the roll-out of Horizon was due to recommence following the resolution of certain issues.

- 37 I have no recollection of any technical issues being discussed. I note that the minutes do not record any such discussion. I have no recollection of anything being reported about problems for subpostmasters. I note that the minutes do not record any such discussion, although they mention that difficulties with 'the provision of support to offices' (which could imply support to subpostmasters, amongst others) had been identified, with work undertaken to resolve them. I have no recollection of raising any concerns.
- Meeting of the Consignia plc Board on 12 June 2001: I point out that the minutes detailed in POL00021476 [WITN0346_01/18] are not minutes of the board of Post Office Limited, but of Consignia plc. As before, despite re-reading these minutes, I have no recollection of the detail of the meeting. I am therefore unable to say what my understanding was at the time of the robustness of Horizon. I note from the minutes that some 40,000 Horizon terminals were reported to have been successfully installed, and 60,000 people trained.
- 39 I have no recollection of any technical issues being discussed. I note that the minutes do not record any such discussion. I have no recollection of anything being reported about problems for subpostmasters. I note that the minutes do not record any such discussion. I have no recollection of raising any concerns.

Other significant meetings

40 My recollection of meetings in respect of the procurement, design, pilot, roll-out and modifications to Horizon are now very hazy. I was not personally involved in any of them, although I was generally aware of much activity taking place at the time. My closest involvement with Horizon was in 1998-99, as mentioned above, when I was a member of the Treasury Working Group.

Reassurance sought from ICL/Fujitsu

41 I have no recollection of any specific requests for reassurance from ICL/Fujitsu as to the Horizon system other than, of course, compliance with the service standards to which ICL was contracted to deliver. I do recall, as some of the minutes referred to above show, that the efficacy of the system was a key focus for the Board.

Political pressure to agree to the ICL/Fujitsu contract

42 Although I was not involved with awarding the contract to ICL/Pathway in 1996, my recollection is that was done after careful analysis of the three finalist tenderers' proposals against specified criteria, in which external consultants and lawyers were heavily involved to give advice and analysis. I recall that the recommendation to appoint ICL/Pathway came from an evaluation panel whose members included Government officials, but I do not recall any direct political pressure to appoint ICL/Pathway. However as mentioned earlier, the need for the successful contract to meet PFI criteria was a key point for Government.

Political pressures in respect of the timing of the roll-out

43 I have no recollection of any such political pressure, other than the general desire, on the part of all parties to Horizon, for it to be rolled out to the planned timetable.

Board awareness of difficulties with Horizon in 1999-2001

44 I believe that the Board was kept fully informed of progress with the Horizon project. The minutes in the documents with which I have been provided support this: the Board papers on which the discussions were based, if they still exist, would reveal more detail.

IT project governance expertise amongst the Board

45 I do not recall there being a member of the main Board with extensive governance experience of a project of the size of Horizon – of which there were few, if any. However, the Board was informed by advice from leading external experts and consultants at key stages of the project.

The Board's effectiveness in scrutinising stages of the Horizon project

46 Much of the close detailed scrutiny of the Horizon project took place below main Board level in project boards and working groups. The Board was given frequent updates on progress, and substantial time was allocated on board agendas for interrogation of those leading the project. Even in retrospect, I have no reason to

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doubt the Board's commitment to ensuring that Horizon was properly scrutinised

in the 1999-2001 period under review.

47 As a general point about these Board meetings, I suspect that the papers and

presentations about which the minuted discussions took place, if still available,

would provide a richer source of information for answering the Inquiry's questions

than the minutes themselves.

Any matters to assist the Chair

48 I have nothing further to add.

Statement of Truth

I believe the content of this statement to be true.

Signed:

GRO

Dated: 16 September 2022

Index to First Witness Statement of Jonathan Evans

No.	Exhibit Number	Document Description	Control Number	URN
1	WITN0346_01/1	Report on Automation Change Programme and Control, dated August 1996	POL-0028173	POL00031271
2	WITN0346_01/2	Automation Transformation Programme Steering Group Meeting Minutes, 23 June 1998	POL-0024806	POL00028324
3	WITN0346_01/3	Correspondence from Paul Rich attaching Horizon - PO Board Follow-Up Report (July 1997)	POL-0025075	POL00028593
4	WITN0346_01/4	ICL/NFSP Action List from Meeting on 28/05/97	VIS00008727	NFSP00000279
5	WITN0346_01/5	Letter from Dave Miller to a number of colleagues re Horizon Testing	POL-0024903	POL00028421
6	WITN0346_01/6	Discussion Paper: 'Discussion on Option 3' prepared by Jonathan Evans, POCL, sent to Harry Bush, HM Treasury, 27 August 1998	POL-0025124	POL00028642
7	WITN0346_01/7	Fax from Sarah Graham DSS: Towards an Inter- ministerial decision	POL-0036141	POL00039877
8	WITN0346_01/8	Note from Jonathan Evans to Sarah Mullens re Inter-Ministerial decision	POL-0036140	POL00039876
9	WITN0346_01/9	Letter from Chris Nicholson, KPMG, to Horizon Working Group Members, attaching 'HM Treasury, BA/POCL Automation Project: Analysis of Fall-Back Recommendations', 16 Oct 1998 (draft)	POL-0025120	POL00028638
10	WITN0346_01/10	Letter from Jonathan Evans to John Roberts re 'Beyond Horizon' presentation to Ministers on 8 December 1998	POL-0025116	POL00028634
11	WITN0346_01/11	Fax from Sarah Graham (DSS) to Sarah Mullen (HMT) copied to	POL-0036196	POL00039932

No.	Exhibit Number	Document Description	Control Number	URN
		McCorkell, Sibbick, Evans, Sandison.		
12	WITN0346_01/12	Letter - legal advice on Government's response to Fujitsu regarding ICL Pathway's failure to meet key milestones ®From: Jeff Triggs - Slaughter and May ®To: Dave Miller - POCL®	POL-0025174	POL00028692
13	WITN0346_01/13	Review of the POCL/ICL Pathway Deal by Roger Tabor, Finance Director POCL (January 1999)		POL00031230
14	WITN0346_01/14	Email from Stuart Sweetman to Neville Bain, John Roberts, Richard Close and Jerry Cope re Horizon Update on new agreement, 23 Feb 1999	POL-0025085	POL00028603
15	WITN0346_01/15	Post Office Board Minutes of 14/09/1999		POL00000353
16	WITN0346_01/16	Post Office Board Minutes of 26/10/1999		POL00000354
17	WITN0346_01/17	Post Office Board Minutes, Meeting of 11/01/2000		POL00000336
18	WITN0346_01/18	Consignia Plc Board Meeting Minutes of 12/06/2001		POL00021476