

Tuesday, 1 November 2022

1
 2 (10.00 am)
 3 MS HODGE: Good morning, Chair, we can see you and hear you.
 4 The first witness today is Mr Coombs.
 5 SIR WYN WILLIAMS: Can I stop you -- oh, I can see you now.
 6 Jolly good.
 7 Mr Coombs and I have made our acquaintanceship
 8 already, in the sense that he and I were on screen about
 9 15 minutes ago so we said hello to each other, all
 10 right?
 11 MS HODGE: Thank you, sir. Please can the witness be sworn?
 12 MICHAEL COOMBS (affirmed)
 13 Questioned by MS HODGE
 14 MS HODGE: Good morning Mr Coombs, I can hear you reasonably
 15 well but I wonder if you might raise your voice a little
 16 bit to ensure that --
 17 A. Is that better?
 18 Q. Thank you, yes.
 19 A. Is that better?
 20 Q. Thank you very much. Please give your full name?
 21 A. My full name is Michael John Barton Coombs.
 22 Q. You should have in front of you a copy of your witness
 23 statement dated 9 September of this year; is that
 24 correct?
 25 A. That is correct.

1

1 Horizon project, but before I do I would like to begin
 2 with a few questions about your professional background
 3 Mr Coombs.
 4 A. Yes.
 5 Q. You joined International Computers Limited upon
 6 graduating in 1969 with a degree in engineering; is that
 7 correct?
 8 A. That is correct.
 9 Q. You have explained in your statement that your
 10 experience was predominantly in the field of project
 11 management, rather than in technical development; is
 12 that fair?
 13 A. That is true.
 14 Q. Would it be right to understand that you did not have
 15 any personal experience of designing or developing
 16 software?
 17 A. No personal experience of doing it.
 18 Q. But is it right that you had, in your earlier project
 19 management roles, overseen software development by
 20 others in ICL?
 21 A. Yes, I had overseen software developments by others
 22 inside the company and also on projects working to
 23 customers.
 24 Q. Is that a role that you considered you were suitably
 25 qualified to do?

3

1 Q. Can I ask you please to turn to page 21 of your
 2 statement?
 3 A. Yes.
 4 Q. Do you see your signature there at the end of your
 5 statement?
 6 A. There is an electronic signature at the end of the
 7 statement, the one with my -- I have got another copy in
 8 a binder here which has got my actual signature.
 9 Q. Could I refer you to that one, please, if I may?
 10 A. Yes. I have it in front of me. It has my signature on
 11 it.
 12 Q. I believe that statement should run to 23 pages in
 13 total; is that correct?
 14 A. That is correct.
 15 Q. With a table of exhibits --
 16 A. With a table of exhibits.
 17 Q. -- on the last two pages, thank you. That statement is
 18 dated 9 September of this year; is that right?
 19 A. 9 September of this year, yeah.
 20 Q. Is the content of that statement true to the best of
 21 your knowledge and belief?
 22 A. It is.
 23 Q. Thank you. Your statement and exhibits are now in
 24 evidence before the Inquiry. I shall be asking you some
 25 questions about your involvement more generally in the

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1 A. Yes.
 2 Q. Your first involvement in Horizon came during the period
 3 of procurement; is that right?
 4 A. That is correct.
 5 Q. I understand you were brought in to provide advice to
 6 the team responsible for bidding for what was then known
 7 as the Benefits Agency and Post Office Counters Limited
 8 Automation Programme; is that right?
 9 A. That is correct.
 10 Q. You were recruited, I think, by reason of your earlier
 11 experience on a similar project for the Inland Revenue?
 12 A. Yes, and also I had, previous to there, done some work
 13 for DSS and George McCorkell, so I was known to the BA
 14 as well.
 15 Q. The one aspect of Pathway's bid that you specifically
 16 recall assisting with relates to the rollout of
 17 terminals to Post Office branches; is that right?
 18 A. That is correct.
 19 Q. Do you recall what if any challenges were identified by
 20 Pathway in implementing the rollout of terminals at this
 21 early bid phase?
 22 A. At the early bid phase, what was actually identified as
 23 the biggest risk is being able to do enough Post Offices
 24 in the time available, so it was all about getting
 25 a beat rate of delivering stuff to Post Offices and

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1 keeping that going.

2 **Q.** Did you or any members of the bid team with whom you
3 worked undertake any site visits of Post Office branches
4 in order to ascertain their readiness for implementation
5 during this bid phase?

6 **A.** I certainly didn't during the bid phase but there were
7 people who went. One place that was visited was An Post
8 in Ireland, because they were using the same software as
9 we were proposing for Post Office.

10 **Q.** So An Post in Ireland was where the system was already
11 up and running; is that right?

12 **A.** They had a version of the system running successfully.

13 **Q.** In terms of the Post Offices in the UK, where Pathway
14 were intending to implement this new system, were any
15 site visits carried out to your knowledge there?

16 **A.** I was not involved in any but I believe there were.
17 I don't know how to prove it but I believe there were
18 site visits.

19 **Q.** You did not remain on the project when Pathway was
20 awarded the contract in May 1996; is that right?

21 **A.** That is correct.

22 **Q.** I think you returned to other project management work
23 being carried out by ICL Pathway at that time?

24 **A.** When the bid finished I went and worked for one of ICL's
25 development organisations in Manchester, looking at

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1 "Ah, yes, but". And so there was a creeping in the
2 requirements that were being put forward.

3 **Q.** You have explained in your statement that you don't
4 recall the specific details of the findings you made in
5 your review; is that right?

6 **A.** At the time, that was 100 per cent correct but with the
7 documents I had been sent latterly, some of them refer
8 to it, so I have had some triggered memories.

9 **Q.** Can you explain what you now recall or how your memory
10 has been refreshed of --

11 **A.** The refreshment was very much around the fact that one
12 of the key issues that I hadn't remembered was that the
13 whole project programme was a PFI and the basis behind
14 a PFI is the transfer of risk. Whilst it was happening
15 with the design change and not baselining it, it was
16 difficult to manage risk being transferred and it raised
17 a number of commercial issues which needed to be
18 addressed about how the programme could proceed, taking
19 account of that.

20 **Q.** Thank you. You participated in a parallel review of the
21 programme, which was undertaken by PA Consulting in the
22 summer of 1997; is that correct?

23 **A.** That is correct, and I saw that document yesterday was
24 passed to me and that was one of the things that
25 triggered my memory a bit about --

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1 large computing. That's where I was working.

2 **Q.** You became involved in the Horizon programme again in
3 the spring of 1997; is that right?

4 **A.** Correct.

5 **Q.** On this occasion you were invited by John Bennett, then
6 managing director of ICL Pathway, and Keith Todd, then
7 managing director of ICL Group, to conduct an internal
8 review of ICL Pathway's management of the programme; is
9 that right?

10 **A.** That is correct.

11 **Q.** What did you understand to be the reasons for the
12 instigation of this review?

13 **A.** Inability to meet delivery timescales for software.

14 **Q.** In your statement you have referred to difficulties
15 baselining the Horizon software. Can you please explain
16 what you mean by that?

17 **A.** Yes. One thing that happened -- well what happened when
18 we started to look at developing the system, what was
19 initially an integration project, ie taking existing
20 projects, the amount of development in it started to
21 increase. Therefore, the workload started to increase
22 and there was difficulty in tying down with the other
23 parties how certain customer requirements would be met
24 and there was, well, requirement creep, so things were
25 defined and sent out for agreement and then it came back

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1 **Q.** I believe you were interviewed in connection with that
2 review?

3 **A.** Yes, I was.

4 **Q.** You were one of the 12 persons who were named as --
5 rather one of the 12 persons who received a copy of the
6 confidential report produced at the end of that review;
7 is that right?

8 **A.** That is correct.

9 **Q.** What I would like to explore with you briefly is the
10 extent to which your own findings, in the review you
11 carried out in the spring of 1997, informed some of the
12 conclusions reached by PA Consulting Group, at the time,
13 concerning the resourcing and management of the project
14 by ICL Pathway.

15 I think you confirmed you have seen a copy of the
16 report. We can bring that up if it would assist. But
17 you will have observed, I think, that one of the
18 conclusions reached by PA Consulting in their review was
19 that ICL Pathway had, at the outset, assumed it could
20 deliver Horizon mostly by systems integration. That's
21 a point you have highlighted yourself this morning; is
22 that correct?

23 **A.** That is correct.

24 **Q.** What PA Consulting concluded was that this had led
25 ICL Pathway, to seriously misjudge the amount of

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1 development work which was needed as well as to
 2 underestimate the time and resources required to deliver
 3 the project. Did you agree with that conclusion?
 4 **A.** Yes. But also, given that there had been a lot of
 5 change in terms of what the nature of the project was
 6 going to end up being, and I wasn't surprised at that
 7 when I started looking in detail.
 8 **Q.** In addition to those observations about resourcing,
 9 PA Consulting Group in their review noted that
 10 ICL Pathway had expressed major concern about the
 11 robustness of the technical architecture. Was that
 12 a concern with which you were familiar at the time?
 13 **A.** Not really. I didn't get involved in the technical
 14 architecture at that period of time, so that wouldn't
 15 have informed me at all.
 16 **Q.** So if I understand you rightly, you simply weren't
 17 aware, at the time of your review, in the spring of
 18 1997, that there were these concerns within ICL Pathway
 19 about the robustness of the technical architecture?
 20 **A.** No, because I do not remember, at that stage, being
 21 involved in a review on technical architecture. I don't
 22 think it was covered in that way by the review I did.
 23 I was more interested in the volume of work, rather than
 24 the structured work and the architecture from going
 25 forward. My main focus was on what was needed to do to

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1 project. So, yes, that's where his role is and that's
 2 a fundamental part of the structure for paying benefits
 3 through Post Offices.
 4 **Q.** There is a reference at AP/5. I understand that to be
 5 "action point 5", where it records:
 6 "Mr Crahan to discuss the findings of the internal
 7 review of security with Mr Coombs.
 8 "The review of security had been completed and
 9 discussed with Mr Coombs. It was agreed that more
 10 openness and co-operation would be required in future.
 11 A workshop would take place on Thursday to consider
 12 a better way forward."
 13 Do you have any recollection of what these issues
 14 were in relation to security?
 15 **A.** I'm just thinking. No. The problem is: (1) it is
 16 a long time ago; and (2) that was, I believe, my first
 17 meeting and in that sort of forum. So there was nothing
 18 around it that I can pull out of my mind.
 19 **Q.** If we could go on to page 3, please. Halfway down the
 20 page, we can see the heading "Updates"?
 21 **A.** Yes.
 22 **Q.** At paragraph 2.1 it records "PDA", Programme Delivery
 23 Authority.
 24 **A.** Yes, that's the organisation I was trying to remember
 25 the name of.

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1 get the programme acceptably back on track and prepared
 2 for rollout.
 3 **Q.** You attended a meeting of the Benefits Agency and Post
 4 Office Counters Programme Delivery Authority Board on
 5 23 September 1997. Do you have any recollection of that
 6 meeting?
 7 **A.** I don't specifically have any recollection but there's
 8 so many meetings I went to. You know, if you have got
 9 a specific question on it that might trigger --
 10 **Q.** Indeed. I wonder if we can pull up POL00028310.
 11 Thank you. We can see here from the heading that
 12 these are minutes of the board meeting of the
 13 23 September 1997?
 14 **A.** Yes.
 15 **Q.** Under the heading "attendees" you are named as the last
 16 but one; do you see that?
 17 **A.** Yes, I do.
 18 **Q.** If we could please turn to the next page, at page 2. At
 19 paragraph 1.2.4.
 20 There is reference here to you, Mr Coombs and to
 21 Mr Crahan. I believe that is Peter Crahan. Do you
 22 recall his role at this stage in the programme?
 23 **A.** Yes, Peter Crahan was involved in the Benefits Agency
 24 automated -- work they were doing on National Insurance
 25 databases, et cetera. I can't remember the name of the

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1 **Q.** This states:
 2 "In addition to the written update provided,
 3 Mr Crahan reported that Release 1c was progressing
 4 through Model Office Rehearsal and the checkpoint
 5 meetings. Model Office Testing was due to be completed
 6 by 26 October and the anticipated release date was now
 7 3 November."
 8 The following paragraph 2.1.1:
 9 "Significant numbers of category one PinICLs (ICL
 10 software difficulties) needed to be resolved. These
 11 were in the areas of security, accounting and
 12 reconciliation. A decision would be taken on
 13 29 September whether the release was fit for purpose and
 14 if so, to how many outlets it would be delivered.
 15 Pathway pointed out that they were striving for release
 16 in 200 outlets because of the effect on Release 2 of
 17 anything less."
 18 We can see PinICLs there described as "ICL software
 19 difficulties". Do you consider that to be a fair
 20 characterisation?
 21 **A.** What they actually are are bugs in the system. So, if
 22 you consider those to be -- oh, lost it.
 23 If you consider those to be ICL difficulties then
 24 they would be ICL difficulties. Looking at a whole
 25 range of them, some of them were minor, had no impact on

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1 moving forward and others had to be solved before you
 2 could move forward.
 3 **Q.** It appears from the preceding paragraph that these bugs
 4 had been raised either in the Model Office rehearsal or
 5 during the Model Office testing of software release 1c?
 6 **A.** Yes.
 7 **Q.** Would that be consistent with what you recall about the
 8 progress of the programme at this stage?
 9 **A.** Yes.
 10 **Q.** In terms of their severity, how serious were category 1
 11 PinICLs?
 12 **A.** They would actually have a problem with the programme
 13 proceeding, either because there was some sort of bug or
 14 failure that had an unacceptable consequence, or because
 15 they required a certain amount of rework and/or implied
 16 something that needed to be sorted before you could move
 17 on to release 2.2, so release 3.
 18 **Q.** Does it follow that they were the most serious types of
 19 bugs in the system?
 20 **A.** Yes, they were the most serious but they would have
 21 a range of seriousness because of the impact. They
 22 would be the most serious but they --
 23 **Q.** So these were problems, I think, of the highest
 24 severity. They were significant in number and they
 25 related at this stage to security accounting and

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1 quality and fitness of a software release?
 2 **A.** Of "a software release" or this software release?
 3 **Q.** Any software release.
 4 **A.** Yes, it always is a barometer but it is not an easy
 5 barometer to read because it is a sort of
 6 three-dimensional issue. So you get problems that exist
 7 now, you get timeframes where they need to be cleared
 8 by, as well as the nature of the (unclear) themselves.
 9 **Q.** I quite understand that some inquiry into the root cause
 10 of a bug and how it might be fixed would need to be
 11 undertaken but, as a starting point, would their number
 12 and severity indicate to you that that further inquiry
 13 needed to be undertaken, that there was a question mark
 14 as to the fitness for purpose of the software?
 15 **A.** It would inform me there were bugs in it but fitness for
 16 purpose, without them being resolved, then there would
 17 be certainly problems in those areas. There would be
 18 concerns whether it was fit for the purpose to put out
 19 for usage. But there might be a difference between
 20 fitness for purpose and putting it out for the wider
 21 population, compared to putting it into Model Office
 22 testing, et cetera, where that is -- where the purpose
 23 is to actually check whether the software is fit for
 24 purpose, if you see what I mean.

25 So it depends on its usage as to whether it is fit

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1 reconciliation; is that a fair inference from what we
 2 can read here at paragraph 2.1.1?
 3 **A.** That is a fair inference but there might have been ones
 4 that weren't within those three headings.
 5 **Q.** Such were the --
 6 **A.** So yes -- in those areas were included. I can't
 7 remember the detail at all around here because it was
 8 all so detailed and so voluminous.
 9 **Q.** I understand.
 10 **A.** But, yes, your inferences have been perfectly correct.
 11 **Q.** Such were the number and severity of outstanding issues
 12 in release 1c, that they appear from what we have read
 13 at paragraph 2.1.1 to have called into question whether
 14 the release was, in fact, fit for purpose. Is that also
 15 a fair inference to draw?
 16 **A.** It is fair but -- yes, it is a fair inference that they
 17 needed to be resolved for the release to continue to
 18 progress.
 19 **Q.** Did you consider at the time that the number and
 20 severity of PinICLs was a reasonably accurate barometer
 21 of the quality and fitness of a software release?
 22 **A.** Sorry, could you repeat that?
 23 **Q.** Yes, of course. Did you consider at the time that the
 24 number and severity of PinICLs being raised in software
 25 testing was a reasonably accurate barometer of the

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1 for the purpose. It could well be fit for the purpose
 2 of testing to find out that the business functionality
 3 covered by it is accurate and works appropriately.
 4 Sorry, does that make sense?
 5 **Q.** Yes, I think so. But you said it might be fit for
 6 further testing of its functionality, that is to say of
 7 the extent to which it meets the functional requirements
 8 of it as a piece of software?
 9 **A.** Yes, which is one part of fitness for purpose.
 10 **Q.** But would it also not raise a question mark as to the
 11 suitability of the software being rolled out?
 12 **A.** It would raise questions on particular releases and if
 13 they are suitable for rollout, because the software was
 14 always moving forward, there are always people looking
 15 and clearing PinICLS and known errors. So, yes --
 16 **Q.** By the time PA Consulting Group had concluded its review
 17 in September 1997, you had been transferred to the
 18 Horizon project and appointed as its programme director;
 19 is that right?
 20 **A.** That is correct.
 21 **Q.** Am I right to understand that your appointment as
 22 programme director formed part of a general
 23 restructuring of ICL's Pathway's organisation and
 24 management, which took place upon completion of your
 25 review?

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1 A. That is true.

2 Q. In your role as programme director, you were assigned
3 overall responsibility for quality and risk management,
4 as well as systems and customer requirements; is that
5 right?

6 A. I was given the role, as I remember, of overseeing.
7 There was a risk in quality group that was there but
8 didn't report to me directly but we did some initial
9 work as a group to try and look at where we were with
10 risk and quality. So, no, I wasn't directly responsible
11 for the function of it but I was asked to get involved
12 in the early days and we did put some more reviews in
13 place, like mid-stage audits on software tech
14 development. But there was a person who reported to
15 John Bennett who was responsible for quality and risk.

16 Q. Do you recall --

17 A. It was Martyn Bennett.

18 Q. Do you recall whether there existed any formal structure
19 within ICL Pathway for conducting internal audit when
20 you became programme director?

21 A. Yes. As far as I can remember, there were and one would
22 expect there to be but I could not tell you exactly what
23 they were and how they were set up, because I would not
24 have been directly involved in this initially. So the
25 first thing I can remember doing on quality is actually

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1 and function of the Electronic Point of Sale Service?

2 A. I don't know what I understood at the time. I know what
3 I feel I understand now and there has been nothing
4 happening to change it. It was effectively a system
5 that worked in accounting in Post Offices, which allowed
6 them to act as a normal shop, selling goods, et cetera,
7 and it was, if you like, the element of the system for
8 doing that -- I am sure that is an inadequate answer but
9 it is sort of the only one I have got in terms of what
10 I can remember.

11 Q. I would like briefly just to explore three aspects of
12 the system with you at a very high level. As
13 I understand it, EPOSS was responsible for recording and
14 processing all of the transactions carried out within
15 the post office branch by customers purchasing products
16 and services of the Post Office; is that correct? Is
17 that consistent with your understanding?

18 A. It is a far more elegant way of putting what I was
19 trying to say.

20 Q. It was also responsible for balancing receipts and
21 payments; is that right?

22 A. I believe so.

23 Q. And for producing what was known as the cash account.
24 Do you recall what the cash account was?

25 A. I'm just thinking for a second. The cash account is

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1 getting established with something which became
2 an annual affair, which was mid-stage audits of releases
3 of software.

4 Q. I think, if I have understood your evidence correctly,
5 you said, upon being appointed programme director, you
6 did play some part in ensuring that further audits or
7 further reviews were carried out; is that right?

8 A. Yes, it is, and part of it was that we diarised making
9 sure that they were linked and that the programme office
10 actually followed up and made sure they occurred. They
11 were taking place but, if I remember correctly, I felt
12 they were deficient in one respect initially, which was
13 mid-life or mid-development or mid-time audit of
14 progress and issues at that time being more formal.

15 Q. You have explained in your statement that the focus of
16 your role as programme director was on project
17 management issues and that you weren't required to have
18 a detailed knowledge of the technical aspects of the
19 Horizon system; is that right?

20 A. That is correct.

21 Q. Presumably you, nonetheless, had a fairly high level
22 understanding of the system's components, including
23 their purpose and function; is that right?

24 A. At the time I certainly would have had.

25 Q. What did you understand at the time about the purpose

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1 only one thing it can be and that is the final
2 documented area, in which all movements of things of
3 value, I would think, rather than cash per se, things of
4 value being sold off or whatever it actually recorded.

5 Q. We can see it described in Pathway's own internal
6 documents as the definitive weekly summary of all
7 transactions performed within the Post Office branch.
8 Does that resonate with you at all?

9 A. Yes, that does. Because that's back to the --
10 everything in the Post Office being recorded and that's
11 obviously where everything in the Post Office that
12 happened was being recorded. Whether all the systems
13 did that, whether that stayed a fact, I don't know but,
14 yes, that does resonate with me.

15 Q. I would like to ask you some questions about a report
16 which you have been shown. It is dated 14 May 2001 and
17 it concerns the activities what was known as the EPOSS
18 PinICL task force.

19 Could the following document be shown FUJ00080690.
20 We can see the title of the report at the top:
21 "Report on the EPOSS PinICL Task Force."
22 This version is version 1.0 and is dated
23 14 May 2001. You have explained in your statement that
24 you don't recall being shown a copy of this report
25 during your time on the programme; is that right?

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1 A. That is correct. On the date shown I had already ceased
 2 work.
 3 Q. I think you quite fairly pointed out that you are not
 4 named on the distribution list that we can see on the
 5 bottom there. That carries the names T Austin, which
 6 I believe is Terry Austin; M Bennett, Martyn Bennett, to
 7 whom you have referred; and D McDonnell, which I believe
 8 is a David McDonnell.
 9 However, if we control down to the second page
 10 please. Under the heading "Document History" at 0.1, we
 11 can see that an initial draft of this report was
 12 produced on 18 September 1998 following completion of
 13 the task force. This is referred to as version 0-point
 14 1. Can you see that Mr Coombs?
 15 A. Yes, I can see that.
 16 Q. That was at a time when you were acting in the role of
 17 programme director, is that right?
 18 A. '98, yes.
 19 Q. I wonder if we could turn up another report please,
 20 dated 28 October 1999. We will return to this shortly
 21 but this other report is FUJ00079782. This is an audit
 22 report into the development of CSR+?
 23 A. Yes.
 24 Q. Do you recall what CSR+ was?
 25 A. Yes, that's the name for a particular release of

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1 just been mentioning which was -- PinICL task force
 2 report is what you are saying, isn't it, as
 3 an associated document?
 4 Q. Yes, that is right.
 5 A. Right, so that's not this document. This document --
 6 Q. No, my apologies. What we have here is a list of
 7 documents associated with the CSR+ development report.
 8 So they may be documents that accompanied the report or
 9 documents that are referred to in the report.
 10 A. Yes?
 11 Q. What this tends to suggest, I believe, is that the
 12 report on EPOSS PinICL task force was brought to the
 13 attention of the senior managers of ICL Pathway by
 14 October 1999 at the very latest; would you agree with
 15 that?
 16 A. I don't remember seeing that particular report, attached
 17 report. I'm trying to think. I might have done but
 18 I can't remember it.
 19 Q. In your statement you confirm that you do recall there
 20 being problems with the EPOSS code; is that right?
 21 A. Yes, EPOSS was an issue and there was work done which
 22 was around these time frames which were quite long and
 23 ongoing, work being done to look at whether the existing
 24 EPOSS software that was having problems was replaced by
 25 another system which went into development or whether

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1 software.
 2 Q. I think it is the Core System Release Plus?
 3 A. Yes.
 4 Q. I don't propose to take you through the detail of his
 5 report now but if we scroll down to the distribution
 6 list. Forgive me, perhaps if we could go back to the
 7 top. Just to confirm, this report is dated
 8 28 October 1999?
 9 A. Yes.
 10 Q. At a time when you remained on the programme I believe?
 11 A. Yes.
 12 Q. We can see you named on the distribution list at the top
 13 of the right-hand column?
 14 A. Yes.
 15 Q. Would it be fair to infer that you received a copy of
 16 this report at the time?
 17 A. I have no reason to believe I didn't.
 18 Q. If we could scroll down to the second page, please.
 19 Under the heading "associated documents" at 0.3 we can
 20 see a number of documents referenced. At [6] there is
 21 reference to the "Report on EPOSS PinICL Task Force"
 22 dated 29 September 1998. So this was a report that was
 23 associated with the CSR development audit distributed to
 24 you?
 25 A. Can I ask a question please? The document that you have

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1 effort was put in to make -- overcome the issues that
 2 were being seen on EPOSS by further development. So the
 3 decision to spend money was made, so there was money
 4 available, but the issue was, "should it be for a new
 5 development or for an exercise to clean up the existing
 6 work development". So yes I remember that quite
 7 distinctly, what I can't remember is the outcome of that
 8 decision. I can't remember what we were -- what was
 9 decided to be done.
 10 Q. Just starting, if we can, with what you understood about
 11 problems with the EPOSS code. What did you understand
 12 at the time about the nature and the cause of these
 13 problems?
 14 A. I'm still thinking a bit. So you are talking about,
 15 with the product itself, the nature and --
 16 Q. Problems with the underlying code that supported the
 17 application.
 18 A. I know they were them because of the points I had made
 19 about the existing release versus new release.
 20 I can't -- I have no -- I cannot recall what the issues
 21 were.
 22 Q. It might assist you -- I think we will see -- but if we
 23 return to the report at FUJ00080690, please. This is
 24 the report that was produced on the EPOSS PinICL task
 25 force. If we scroll down a bit a little bit. We can

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1 see the authors of the report were J Holmes --
 2 I believe, Jan Holmes --
 3 **A.** That's correct.
 4 **Q.** -- and David McDonnell, to whom you referred earlier on
 5 in the distribution list. At page 17, we can see that
 6 one of the key concerns, raised in the report, related
 7 to the quality of code in the EPOSS product.
 8 **A.** Is this the document from -- what the date of this
 9 document I'm looking at now? I'm beginning to lose
 10 timescale.
 11 **Q.** Of course, sorry. So this is version 1.0 of the EPOSS
 12 PinICL task force, dated 14 May 2001. What we have
 13 established is an initial draft of this document was
 14 produced on 29 September 1998 and, therefore, at a time
 15 when you were still involved in the programme as its
 16 director. What I would like to establish is whether
 17 what is recorded in this report assists you at all in
 18 recollecting what you understood about problems with the
 19 EPOSS code at the time. Does that make sense?
 20 **A.** It makes perfect sense.
 21 **Q.** Thank you. So under paragraph 7.3, please, we can see
 22 it bears the subheading "Existing Code" and in the
 23 square box at the top there is a note to the effect
 24 that:
 25 "This section has been produced with the assistance
 25

1 there are undeniably problems and there were a lot of
 2 PinICL fixes and yet, at times, there were concerns
 3 about the quality and number of PinICL fixes but
 4 I couldn't tell you how many there were, what category
 5 there were, et cetera, because I cannot remember this
 6 level of detail. It just doesn't come back to me.
 7 **Q.** I understand. You have also confirmed in your statement
 8 that you recall there being a high number of faults in
 9 the EPOSS component of the system; is that right?
 10 **A.** Yes. Trying to add some sense there; I mean, one of the
 11 issues with EPOSS was the number of PinICLs and the work
 12 needed to clear the PinICLs. So I think that is the
 13 core thing that I hold onto as a memory. But going
 14 below that is somewhat difficult and going to where they
 15 put in code is even more difficult.
 16 **Q.** I think your recollections of issues with EPOSS mirror
 17 another area of concern which was raised by the authors
 18 of the task force report. If we could go back, please,
 19 to page 7., under the heading "EPOSS Code (Section
 20 7.2)".
 21 **A.** Yes.
 22 **Q.** What we see in the first paragraph broadly reflects what
 23 we have already covered --
 24 **A.** Yes.
 25 **Q.** -- but, for consistency, I will repeat it:
 27

1 of Dave McDonnell and Martin Smith and their combined
 2 experience of structured programming."
 3 It goes on to say that:
 4 "Although parts of the EPOSS code are well written,
 5 significant sections are a combination of poor technical
 6 design, bad programming and ill thought out bug fixes.
 7 The negative impact of these factors will continue and
 8 spread as long as the PinICL fixing culture continues.
 9 This is partly due to the nature/size of the bug-fixing
 10 task and partly due to the quality and professionalism
 11 of certain individuals within the team."
 12 The report goes on to give a series of
 13 illustrations, of quite a technical nature, of the
 14 problems that had been discovered in the code. Do those
 15 general observations resonate with you at all in
 16 relation to what you understood at the time to be the
 17 problems with the EPOSS code?
 18 **A.** Certainly, what I'm looking at with existing coding,
 19 it's so much more depth than I would have looked at or
 20 needed to look at. The conclusions don't resonate
 21 because I can't remember this actually ever being
 22 successfully concluded. I don't know and can't remember
 23 anything happening in my time on the programme to say
 24 what happened to EPOSS. So I have that as a problem in
 25 fixing this, as to I can read the words there and, yes,
 26

1 "It is clear that senior members of the Task Force
 2 are extremely concerned about the quality of code in the
 3 EPOSS product. Earlier this year the EPOSS code was
 4 reengineered by Escher and the expectation is that the
 5 work carried out in Boston was to a high standard and of
 6 good quality. Since then many hundreds of PinICL fixes
 7 have been applied to the code and the fear is that code
 8 decay will, assuming it hasn't already, cause the
 9 product to become unstable. This ['presents', I think
 10 it should be, with an 'S'] a situation where there is no
 11 guarantee that a PinICL fix or additional functionality
 12 can be made without adversely affect [I think it should
 13 be 'affecting'] another part of the system."
 14 The report goes on to state:
 15 "However, a more worrying concern from the
 16 Programme's perspective should be the reliance on the
 17 EPOSS product in its current state as a basis for
 18 planning and delivery. During the Task Force there was
 19 relatively little testing that directly impacted EPOSS
 20 and yet [more than] 200 PinICLs, roughly 50 per week,
 21 were raised. Immediately following the conclusion of
 22 the Task Force it is intended to re-run System Test Main
 23 Pass and various other test streams. While I am
 24 confident that the fixes delivered by the Task Force
 25 will prove to be reliable I fully expect the PinICL rate
 28

1 to increase as further testing is carried out.
 2 "Lack of code reviews in the development and fix
 3 process has resulted in poor workmanship and bad code."

4 Reference is then made to the four examples which
 5 were cited at the end of section 7.3, to which we have
 6 referred.

7 Bearing in mind that you recall an issue with high
 8 volume of PinICLs, again, do these conclusions that you
 9 have read here resonate with you in terms of the
 10 seriousness and severity of the problems that Pathway
 11 were facing in September 1998?

12 **A.** I think people were becoming aware of it as a main
 13 issue, which is why the task force was set up, so, yes,
 14 there were issues there. If you ask me to look at that
 15 and the rest -- as I say, senior members of the task
 16 force -- I don't know. It talks about people and
 17 I don't know the people or what their role was because
 18 there are certainly different views about what to do
 19 with EPOSS, based on what we actually had or could get.

20 And what I can't do is I can't disagree with
 21 anything you have said. There were problems with it but
 22 whether it would cause -- a lot of what is there is
 23 a view of a person, which may be totally accurate, but
 24 it is a view which may be disputed or not agreed to by
 25 people responsible for it. As I say, the systems or

1 **Q.** Can you see me as well?

2 **A.** I can hear and see you.

3 **Q.** Thank you.

4 Before the break, we were discussing the findings of
 5 the EPOSS PinICL task force report, originally produced
 6 in September 1998. Before we move on from that topic,
 7 there is one further question I would like to raise with
 8 you.

9 One of the risks identified in that report was that
 10 the application of PinICL fixes risked causing code
 11 decay, which I understand to mean a further
 12 deterioration in the quality of the EPOSS code. Was
 13 that a risk to which you were alive at the time?

14 **A.** No, it wasn't. I was alive to the fact there were
 15 PinICLs that needed to be resolved but I cannot remember
 16 any discussion about decay of the product but it must
 17 have been part of the discussion that was being had
 18 because there were two EPOSSes being discussed. One was
 19 a redevelopment and one was the existing one. I am
 20 sure, within the task force themselves, they must have
 21 had discussions as to how many PinICLs and the likely
 22 impact. But I have no knowledge of anybody making the
 23 comment that it would actually cause decay. So it is
 24 not something I was actually alive to at all, nor can
 25 I remember it and I have not seen it in a document.

1 development director took a personal interest in it.

2 **Q.** I think the point you are making is that this was the
 3 opinion of the authors of the report; is that right?

4 **A.** What I do remember is the fact that there was
 5 a discussion around using existing EPOSS versus a new
 6 EPOSS and part of the new EPOSS approach was doing so
 7 much stuff with Escher. That I remember. What I can't
 8 remember is which one was used. I just can't -- I don't
 9 know the outcome of this, it is a big problem I'm
 10 having. So not knowing the outcome I find it difficult
 11 to comment in detail on some of the position that may or
 12 may not have existed. Am I making myself clear?

13 **Q.** Yes, you are, Mr Coombs. We will come on in due course
 14 to what appears to have been the outcome but this may be
 15 a convenient time in which to take a short break and we
 16 have been going for 50 minutes.

17 Sir, would you be content for us to break for
 18 10 minutes --

19 **SIR WYN WILLIAMS:** Yes, certainly.

20 **MS HODGE:** Thank you very much.

21 (10.51 am)

(A short break)

23 (11.03 am)

24 **MS HODGE:** Thank you, sir. Mr Coombs, can you hear me?

25 **A.** Yes, I can.

1 One of the problems I have with going through this,
 2 on this particular topic, is the fact that there seems
 3 to be a long gap in terms of documentation between the
 4 1998 report and the one that I had already stopped
 5 working for before it came out in May 2001 and I have no
 6 recollection of what happened in the middle. Which
 7 makes it rather difficult.

8 **Q.** You have explained in your statement that you took
 9 a period of medical leave from work in the spring of
 10 1999 and that you returned on lighter duties in or
 11 around June 1999; is that right?

12 **A.** That is correct.

13 **Q.** You would have learned upon your return to work in
 14 June 1999 that the Benefits Agency had withdrawn from
 15 the programme --

16 **A.** Yes.

17 **Q.** -- and that the Horizon system had progressed into
 18 an operational live trial; is that right?

19 **A.** Yes.

20 **Q.** Do you have any recollection of your involvement in the
 21 acceptance of the Horizon system after completion of the
 22 operational live trial?

23 **A.** So you are talking about acceptance for entering
 24 rollout.

25 **Q.** That is right.

- 1 **A.** Right. I know there was -- I have virtually no memory
2 of it. I couldn't say that I remember what happened at
3 the time or where we were at the time. If you had asked
4 me two days ago I would have said "I can't remember
5 anything". I can remember more now because I got
6 a document, which was provided by the Inquiry yesterday
7 afternoon, which actually covered some of those aspects.
8 I have scanned it but I haven't actually managed to make
9 sure it sinks in. It was a document sent to me late
10 yesterday afternoon.
- 11 **Q.** You might be assisted if we turn up the minutes of
12 a meeting which you attended in August 1999. Please
13 could we show POL00043681. This is a copy of an email
14 from an Andrew Simpkins, a consultant employed by French
15 Thornton who was working for Post Office Counters at the
16 time. It is addressed to Peter Copping and David Rees,
17 two employees of PA Consulting Group, who had been
18 involved in the earlier review conducted in the summer
19 of 1997 --
- 20 **A.** Yes.
- 21 **Q.** -- and it is copied to a number of recipients, including
22 you. We can see your name after Keith Baines and Min
23 Burdett; can you see that?
- 24 **A.** Yes, I can.
- 25 **Q.** This email contained, as an attachment, the minutes of

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1 had been attributed to the incident, a short description
2 of the incident in the next column, and then the ratings
3 ascribed to each incident by ICL Pathway and Post Office
4 Counters.

- 5 Out of the incidents listed there, three had been
6 ascribed a high severity by Post Office Counters. We
7 can see that at AI376. I don't know if that can be
8 highlighted.
- 9 **A.** Yes.
- 10 **Q.** That incident was described as the "Derived cash
11 account".
- 12 **A.** Yes, I can see it highlighted now.
- 13 **Q.** Thank you. We can then see AI218 "Training", also
14 categorised as high by Post Office Counters. Thirdly,
15 AI298, which is described briefly as "Counter
16 lockup/freezes".
- 17 **A.** Of the three that you have identified there, I remember
18 one and the situation, which is "Training". And the
19 situation was a situation where their training was being
20 prepared, piloted and run and there was
21 a disagreement -- I think is the right way of putting
22 it -- between the two parties as to how much training
23 actually came under the contract or the PFI contract and
24 what class of training. So there was some disagreement
25 on training.

35

- 1 a management resolution meeting, which you attended on
2 12 August 1999. We can see those minutes at page 2,
3 please. Under the heading "Attendees", you appear to be
4 listed as one of two representatives of ICL Pathway?
- 5 **A.** Yes, the other one is a John Dicks, who was the
6 requirements director.
- 7 **Q.** We can look at some aspects of the minute shortly but it
8 is clear from reviewing these minutes that the purpose
9 of the management resolution meeting on 12 August was to
10 discuss the status of Acceptance Incidents which had
11 been raised during the operational live trial of the
12 Horizon system. Do you have any recollection of what
13 those Acceptance Incidents were?
- 14 **A.** I was heavily involved in this whole area and there was
15 a lot going on, to put it mildly, at this time, in terms
16 of areas that were being looked at to try and work out
17 how we proceeded. So, it is not unfamiliar but do
18 I recognise each individual point on the minutes? Then
19 some of them I can't remember.
- 20 **Q.** If we scroll down to the heading "Current Status of
21 Disputed Severity Ratings on Hot List", what I think we
22 can see are the --
- 23 **A.** For the first time, I recognise that I have seen this
24 document.
- 25 **Q.** So we have, in the left-hand column, the number which

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1 So I believe that is a different nature to the other
2 two, which are probably to do with system training was
3 not directly -- and I am sure it was agreed in the end
4 and there was a passing backwards and forwards into
5 special contractual -- what training was contracted for
6 because it was specified, so by being specified had
7 limits.

8 And if I remember correctly, Pathway were being
9 asked to exceed what we believed was our contractual
10 requirement. This is one of the areas where commercial
11 bumped into programme issues with the nature of the
12 contract. So that is a different sort and I think was
13 actually resolved fairly easily in the end by deferring
14 to contract.

15 The derived cash account, counter lockup and
16 freezes -- derived cash account, well, I wouldn't know
17 what that was. It doesn't trigger -- this far away,
18 I can't remember the technicalities in either. Counter
19 lockup and freezes. Yeah, well ...

- 20 **Q.** I propose to come back to each of those AIs shortly
21 Mr Coombs, but before I do, we can see that, whereas
22 Post Office Counters has graded each of these incidents
23 as high, by contrast, Pathway has ascribed to AI376
24 a low severity rating. It has deemed AI218 to be closed
25 and AI298 to be low.

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1 What do you think accounted for this difference in
2 severity rating as between Post Office Counters on the
3 one hand and ICL Pathway on the other.

4 **A.** Well, on training, I've explained what it was there. On
5 the other one, I cannot explain it without having
6 a better understanding of what they were and what the
7 position of both parties, or just the position of ICL,
8 was. I can't really comment because I can't think of
9 any reason -- apart from point proving and point
10 scoring, which do occasionally go on on large projects,
11 I can't see any reason in the information we were
12 looking at to be able to say it was because of this or
13 because of that. I know insufficient about how the
14 counter locked up and froze, how often did it occur,
15 what was the impact? I don't know those questions.

16 Without understanding that, I can't, from memory,
17 say why there was the discrepancy. One I can
18 understand, the other two I can't.

19 **Q.** Do you recall what the thresholds for acceptance of the
20 Horizon system were in the summer of 1999?

21 **A.** No. It is out of my brain.

22 **Q.** From the documents obtained by the Inquiry, we know that
23 the existence of one or more high severity faults or
24 deficiencies would have resulted in the Horizon system
25 failing to meet the threshold for acceptance; does that

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1 But some of the views that Pathway had probably were
2 optimistic in terms of low impact of things and also the
3 other way. So one we have discussed, training: the
4 amount of training that was trying to be got as
5 an extension or to get us through this was actually
6 quite high.

7 Sorry, could you repeat the last question, if
8 I haven't --

9 **Q.** No, I don't think there's any need. I'm satisfied that
10 you have given an answer to that question, Mr Coombs,
11 thank you.

12 If we could turn to the issue of training, which is
13 the one, I think, in relation to which you have better
14 recall. We know that, shortly before this meeting which
15 you attended on 12 August, you were copied into some
16 correspondence between John Dicks, the director of
17 customer inquiries at ICL Pathway, and Bruce McNiven,
18 who was then Horizon programme director. You have
19 referred to some of that correspondence in your
20 statement --

21 **A.** Yes.

22 **Q.** -- is that right? Please could we show POL00028365.
23 This is a letter dated 10 August 1999, addressed to John
24 Dicks. We can see from its title that it relates to
25 Acceptance Incident 218 and the issue of training.

39

1 resonate with you at all?

2 **A.** No, it doesn't. In my head I know it was low, the
3 number, but I didn't think it was that low. So, no, it
4 is not something I would remember. It doesn't resonate
5 at all.

6 **Q.** Would you have been aware at the time that a failure by
7 Horizon to achieve contractual acceptance would have
8 placed ICL's Pathway's right to payment for the design
9 and development of the system in jeopardy; is that
10 an issue you would have been alive to, do you think?

11 **A.** Yes, I would have been alive to it because commercial
12 directors would want to know progress at a very high
13 level as to when the actual amounts were triggered,
14 because they were not insignificant.

15 **Q.** Would it be fair to say or to infer that there would
16 have been a strong imperative at this time for
17 ICL Pathway to secure the downgrading of these high
18 severity incidents, in order to retain -- in order to
19 obtain a return on the substantial investment, which it
20 had made in designing and developing the Horizon system?

21 **A.** There would have been an imperative to make sure that
22 they were understood by whoever was looking at them, the
23 systems director, and that there was an agreement on the
24 levels. So I can see this as a starting point going
25 through and looking at the effects on acceptance.

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1 If we scroll down to the second page, please. We
2 can see there what is described earlier as an analysis
3 of the evaluation that had been carried out in the
4 preceding weeks against the business impacts identified
5 in the Acceptance Incident.

6 **A.** Right.

7 **Q.** Now --

8 **A.** It shows to me that previous document with "Training" in
9 it, when I said it was an issue which was contractual --
10 to do with the amount of training, that was a different
11 issue. This is --

12 **Q.** We can come to that letter. I think the letter to which
13 you have referred is a response to this letter. So if
14 we perhaps take them in their chronological order. This
15 was the letter from Post Office Counters to Pathway. We
16 can come onto the response. If we just look briefly at
17 the left hand column, which bears the heading "Business
18 Impact".

19 **A.** Yes.

20 **Q.** I don't propose to take you through all of the detail
21 but the first box there identifies as a business impact
22 of this incident:

23 "The Office Managers ability to undertake daily
24 balancing and produce a cash account is adversely
25 impacted resulting in a failure to support accurate

40

1 [Post Office Counters Limited] accounting. This is
 2 a high severity impact on [Post Office Counters'
 3 Limited's] ability to perform its normal business
 4 functions."
 5 **A.** Yes.
 6 **Q.** What this appears to suggest is that issues in relation
 7 to training were not simply a question of how much
 8 training was being provided but whether or not it was
 9 equipping office managers adequately to carry out their
 10 daily balancing and produce a cash account. Does that
 11 resonate at all with you in relation to what you
 12 understood about training issues at the time?
 13 **A.** I'm trying to think. It doesn't resonate at this level.
 14 Was I copied on this? I was, wasn't I?
 15 **Q.** Forgive me, yes. If we scroll up to the bottom of the
 16 first page. Thank you, we can see~...
 17 **A.** I think I was. I think I saw it at the time but -- it
 18 looks familiar but ...
 19 **Q.** My question really is, were you aware that Post Office
 20 Counters' concerns about training were focused
 21 particularly upon the cash account module and the
 22 adequacy of that module to prepare office managers for
 23 balancing on Horizon?
 24 **A.** Not in the way that you say. What I was aware of on
 25 training was that we were trying to get into a situation

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1 which comprised a sample of 102 offices:
 2 "Overall, attitudes towards Horizon are better at
 3 the LT2 ..."
 4 Which I believe is a reference to live trial 2:
 5 "... compared to the LT1 experience. The key
 6 outstanding issues to emerge from research were as
 7 follows ..."
 8 It then follows a list of four issues. The first of
 9 which was that:
 10 "The course is still considered to be too short and
 11 intensive."
 12 The second that there was a need for further
 13 stream --
 14 "The need to further stream the training groups."
 15 Thirdly, it was noted that there was "variation in
 16 trainer quality" and, finally, that there were
 17 "significant problems with technical and software faults
 18 in the training sessions".
 19 So, as at 10 August 1999, these issues, it appears,
 20 remained outstanding?

21 **A.** Yes.
 22 **Q.** I think in the response to which you have referred
 23 that's dated the 11th August 1999, if you could just
 24 bear with me a moment?
 25 **A.** One comment on these 3.1 the qualitative -- the first

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1 where we had training which enabled a rollout. A lot
 2 was to do with resourcing standards, approaches etc.
 3 I certainly didn't pick this up as being that way. No
 4 I certainly didn't pick this up. I can't remember what
 5 I did at the time, whether I did or whether I didn't.
 6 For the moment -- it is familiar but I don't understand
 7 what -- again, what resulted from it. Is it worth
 8 taking me through the next page and seeing if that
 9 triggers anything.
 10 **Q.** Thank you. If we go back to page 2. In the middle of
 11 the column we have "summary of success criteria measure"
 12 and these were essentially some criteria, as
 13 I understand it, that Post Office Counters requested be
 14 met and in the final column an evaluation confirming
 15 that at least the second two criteria had been met and
 16 albeit there is a longer explanation, the first appears
 17 also to have been met. So we know that there was
 18 a period of review of this incident and that some of the
 19 criteria against which Pathway were required to perform
 20 had been satisfied. If we could however scroll to the
 21 final page please. Under the heading "Qualitative
 22 Measures". What it records at paragraph 3.1 is that:
 23 "Although the small sample size of 18 responses
 24 limits the validity of the findings, some significant
 25 improvements were found in comparison to Live Trial 1",

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1 one, of course still considered too short and intensive,
 2 that was actually a programme commercial issue clash
 3 under the contract, I think being asked to do more,
 4 working out who can do what and who had to pay for what.
 5 I can remember that issue -- an issue coming up like
 6 that in terms of training, which is what I referred to
 7 earlier in this period. There were some very hard
 8 discussions on training which you can do, train as you
 9 can really do lots and lots of training, if you can get
 10 the resource to do the training -- which is always
 11 an issue -- you can do lots and lots of training but
 12 somebody has to fund it and the contract says
 13 such-and-such is expected then it's -- something just
 14 needs to be resolved commercially.

15 I don't think that made much sense. Sorry about
 16 that.

17 **Q.** No, not at all. I think you make the point there were
 18 commercial discussions to be had --
 19 **A.** Yes.
 20 **Q.** -- as to who would fund the more expansive training
 21 course that Post Office Counters were seeking from ICL
 22 Pathway; is that fair?
 23 **A.** That is fair.
 24 **Q.** Before we move on to ICL Pathway's response to this
 25 letter, we can see at the final bullet point the

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1 reference to significant problems with technical and
2 software faults. This appears to raise the possibility
3 that the problems which end users were experiencing when
4 trying to balance their accounts and produce a cash
5 account were not necessarily caused entirely, or
6 predominantly, by issues in relation to the quality of
7 the training that they were receiving, but could also
8 have been related to on going technical and software
9 faults that were being observed during the training
10 sessions. Do you think that's fair inference to draw
11 from the point that's being raised there?

12 **A.** I would look at that differently. Yes, it makes
13 a statement about significant problems with technical
14 and software faults in training. So I see those
15 significant faults/problems might be as a result of
16 training code itself, rather than the product behind it
17 because training systems were set up to do it.

18 The other thing I would take from that is there was
19 an identification of something that needed to be
20 rectified. So I would expect this to be -- this round
21 to be rectified to a level suitable and that fitted with
22 the contract by rollout. So I would see it as
23 an indication of further work that needs to be done and
24 making it quite clear that it is seen as significant.
25 So I don't necessarily -- well, I don't disagree with

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1 you were saying, does it relate to -- then no, I had
2 this problem with the EPOSS that everything disappears
3 from my mind before the end point. I still --

4 Excuse me, I'm getting confused here. Could you ask
5 me your last question again?

6 **Q.** Yes, of course. You confirmed earlier in your evidence
7 that you were aware of problems with the EPOSS code;
8 that is correct, isn't it --

9 **A.** Yes.

10 **Q.** As at August 1999, it was being brought to your
11 attention that end users, such as subpostmasters and
12 office managers, were experiencing significant
13 difficulties in balancing their accounts in producing
14 a cash account, which was a function of EPOSS, was it
15 not?

16 **A.** I believe it was.

17 **Q.** My question to you was whether it occurred to you at the
18 time that these difficulties might not be attributable
19 principally to training or user error but rather to
20 bugs, errors and defects in the EPOSS application.

21 **A.** Could you just say that last bit of what you said again?

22 **Q.** Yes, of course. The question is whether the reported
23 concerns about the difficulties which office managers
24 were experiencing in attempting to balance their
25 accounts, might be attributable, in fact, to bugs,

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1 you but I would just read it a different way.

2 **Q.** The response which I think you have mentioned in your
3 statement you discussed with John Dicks at the time and
4 which was sent with this letter, was dated
5 11 August 1999. It is FUJ00079159. We don't need to
6 turn it up because I know you have seen it and you
7 explain in your statement that, essentially, you reached
8 the conclusion in discussion with Mr Dicks that
9 ICL Pathway had delivered further training at the
10 request of Post Office Counters and that the remaining
11 issues, so far as you were concerned, appeared to relate
12 to how Post Office Counters was managing change within
13 its business. Is that a fair summary of your position
14 as at August 1999?

15 **A.** It is the document you want to -- yes, that would have
16 been my position.

17 **Q.** Bearing in mind what you knew about the problems with
18 the EPOSS code, did you consider that some of the
19 problems which end users were experiencing when trying
20 to balance their accounts and produce the weekly cash
21 account might, in fact, be attributable to bugs, errors
22 or faults in the EPOSS product?

23 **A.** No, I didn't consider that -- it may have occurred to me
24 and I might have -- we're probably aware, I'm sitting
25 now, do you I remember it being in a position where what

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1 errors and defects in the EPOSS application?

2 **A.** This was for software in -- actually used in Post Office
3 or are we talking about training systems or are we
4 talking about --

5 **Q.** As I understand it, by this time, EPOSS had been in
6 operational live trial and rolled out to at least 200
7 offices.

8 **A.** Yes? Unless somebody raised EPOSS as an issue with me,
9 which I don't remember at this stage, which apart from
10 the bits we discussed so far, I can't remember anything
11 else, then, no, it would not have occurred to me.
12 Because ...

13 **Q.** We know that one of the other high severity Acceptance
14 Incidents which was observed by Post Office Counters
15 during the operational live trial related to the
16 integrity of data being processed by Horizon, this was
17 Acceptance Incident number 376.

18 I don't think you have much recollection of that
19 incident; is that correct?

20 **A.** That is correct.

21 **Q.** It appears from the documents obtained by the Inquiry
22 that this incident related to discrepancies between the
23 daily transactions recorded on the branch counter and
24 the cash account that was being generated by Horizon.
25 Essentially, Horizon was not accurately accounting for

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1 all of the transactions being performed by the end user
 2 at the branch counter. Does that brief explanation
 3 assist you at all in your recollection of this incident?
 4 **A.** No, it doesn't. One of the problems with trying to
 5 recollect is that I didn't have responsibility for the
 6 development of the testing and the rest, so I'm trying
 7 to remember things across 20 years that were probably in
 8 memos, letters and meetings, and there are better people
 9 that existed in the programme at the time who should be
 10 able to answer this question much better than me. But
 11 I will continue trying the questions.
 12 **Q.** Before we move on from acceptance, Mr Coombs, the final
 13 incident which was graded as high severity was AI298.
 14 This related to counter lockups and freezes. Do you
 15 recall what, if anything, you understood about that at
 16 the time?
 17 **A.** I'm trying to think what I would have been aware of at
 18 the time or what I'm aware of now. No, I wouldn't
 19 necessarily have picked up on that, unless it was raised
 20 in a review I attended and I cannot remember it being in
 21 a review, either internal or with a customer, that I can
 22 remember. So no ...
 23 **Q.** We know that it was raised at the management resolution
 24 meeting on 12 August. I think really what I would like
 25 to establish is whether you understood counter lockups

1 were made in this report, in this audit report, about
 2 the quality of the EPOSS product?
 3 **A.** I cannot remember but I am sure it is in the document.
 4 **Q.** Please could we turn to page 17. Can we go to the
 5 following page, please. Sorry, that must be my
 6 reference. The paragraph I'm looking for is
 7 paragraph 4.2.1 under the heading "[Post Office
 8 Counters] Infrastructure". I think it must be possibly
 9 page 19.
 10 Mr Coombs, you should be able to see there at the
 11 top a heading "[Post Office Counters Limited]
 12 Infrastructure" --
 13 **A.** Yes.
 14 **Q.** -- followed by a subheading "Electronic Point of Sale
 15 Service".
 16 **A.** Yes.
 17 **Q.** Under the title "Commentary", we have, essentially, the
 18 findings of the audit report, relating to the EPOSS
 19 product. The first paragraph reads:
 20 "From the CSR+ perspective the development of the
 21 EPOSS product has been successful with software drops
 22 being made according to planned schedules and confidence
 23 in the team that future drops will also be achieved on
 24 time."
 25 Can you see that?

1 and freezes to be a hardware issue, a software issue or
 2 possibly a combination of both.
 3 **A.** I don't recall them enough to be able to make that
 4 statement. I don't know how to answer that question
 5 because I didn't have a view. I'm not aware I had
 6 a view.
 7 **Q.** Mr Coombs, I have one final topic I would like to raise
 8 with you but now may be a convenient time to take
 9 another short break before I deal with that final topic.
 10 Would that suit you?
 11 **A.** I'm happy to continue if you wish to.
 12 **Q.** Thank you.
 13 I would like to turn to the audit of the Core System
 14 Release Plus, which was conducted in September 1999, at
 15 the time when negotiations were on going between ICL
 16 Pathway and Post Office Counters over the resolution of
 17 the high severity Acceptance Incidents which we have
 18 just discussed.
 19 We have pulled up this report before. It is
 20 FUJ00079782. When we looked at this document earlier
 21 this morning you agreed, I believe, that you were named
 22 as one of the senior managers to whom this report was
 23 distributed.
 24 **A.** Yes.
 25 **Q.** What if anything do you recall about the findings which

1 **A.** Yes, I can see that. What's the date of this document
 2 again?
 3 **Q.** Forgive me, this was produced in October 1999.
 4 I believe it was on or around 18 October. If we go back
 5 to the top, we should be able to see -- forgive me,
 6 28 October 1999.
 7 The second paragraph reads:
 8 "Unfortunately EPOSS continues to be resource hungry
 9 in dealing with live problems associated with CSR [the
 10 Core System Release] and in ensuring that these fixes
 11 are broad forward and incorporated into the CSR+
 12 product."
 13 **A.** Yes.
 14 **Q.** Do you have that?
 15 **A.** Yes.
 16 **Q.** The third paragraph really gets to the substance of the
 17 concerns that were raised and it refers back to the
 18 EPOSS task force report that we discussed earlier in
 19 your evidence. That was the report produced in
 20 September 1998?
 21 **A.** That was the '98 one. This is '99.
 22 **Q.** That is correct, October 1999. It confirms that:
 23 "The EPOSS Task Force Report raised the question of
 24 the maintainability and resilience of the EPOSS code
 25 following the 6 week PinICL blitz where some 550 PinICLs

1 were processed. Since then a further [approximately]
 2 996 PinICLs have been raised -- using the 'Product ...'"

3 Then this is a search criteria, which is:
 4 "EPOSS and Target Release = IR-CSR or PDR-CSR..."

5 That appears to be a search criteria used by the
 6 auditors to identify which of the PinICLs related to the
 7 EPOSS product.

8 **A.** Yes.

9 **Q.** It goes on to say that:
 10 "In particular the maintainability, resilience and
 11 potential for change aspects must be subject to doubt.
 12 The report also identified many instances of poor
 13 programming technique and application of coding
 14 standards and while CSR+ changes have been reviewed by
 15 the Team Leader no attempts have been made to address
 16 the significant body of code not affected."
 17 So, if we go on, please, a little further down.

18 **A.** Yes.

19 **Q.** Above the table there are two paragraphs. The first
 20 reads:
 21 "To ... support the recommendations statistics on
 22 EPOSS & Desktop PinICLs raised since 1st October 1998
 23 were obtained."
 24 It then describes the selection criteria used.
 25 Again, I understand these to be a reference to the

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1 because I'm not recognising a lot of this and I should.

2 **Q.** The date of the document is 28 October 1999.

3 **A.** Version 1?

4 **Q.** If we scroll to the top. Yes, Version 1.0.

5 **A.** Right, I scanned it.

6 **Q.** If it assists, if we could highlight the box, please,
 7 with the text in italics. This records that "The EPOSS
 8 Solutions Report", which is a document we don't have but
 9 which was produced in September 1999, had:
 10 "... made specific recommendations to consider the
 11 redesign and rewrite of EPOSS, in part or in whole, to
 12 address the then known shortcomings."
 13 It goes on to say that:
 14 "In light of the continued evidence of poor product
 15 quality these recommendations should be reconsidered."
 16 **A.** Right.

17 **Q.** Do you have any recollection of --

18 **A.** I have recollection of a lot of discussions and lots of
 19 meetings about EPOSS and, reading the highlighted ones
 20 again, I recognise those, having seen it. The big
 21 problem I have got, as I said before with EPOSS, is
 22 I don't know what's happened. I'm looking at two
 23 options and I cannot remember, for the life of me, which
 24 option was followed. If I look at some of the
 25 documents, I would think it is probably going to be that

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1 search terms used to identify which PinICLs related to
 2 EPOSS. We see in a table below the months, starting
 3 October 1998. Can you see that in the left-hand column?

4 **A.** Yes, I can.

5 **Q.** Then, in the two other columns, the number of PinICLs
 6 which match the criteria "EPOSS & DT", Desktop, or
 7 simply "EPOSS".
 8 If we could carry on, please, to the following page.
 9 This takes us all the way through to October 1999, which
 10 is when the audit report was produced.
 11 I'm sorry, could you finish by scrolling down.
 12 The report records:
 13 "The figures [those that we can see in the table
 14 above] indicate that the problems facing EPOSS during
 15 the Task Force period have not diminished. Of greater
 16 concern are the non-EPOSS PinICLs within the group
 17 suggesting that there are still serious quality problems
 18 in this vital, customer facing element of the system."
 19 In terms of the recommendations that arose from
 20 this, do you recall specifically what was recommended,
 21 in light of the high volume of PinICLs that were still
 22 being raised against the EPOSS product in October 1999?

23 **A.** I was copied on this document, was I?

24 **Q.** You are named on the distribution list.

25 **A.** When was it -- the first version, when did it come out

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1 but it might be the other and nowhere in the
 2 documentation have I seen anything which said what
 3 decision was actually made. I can't understand why not.

4 **Q.** Sorry, Mr Coombs. If we reflect for a minute on the
 5 chronology of these reports, what we know -- or what
 6 appears to be shown by this audit report is that
 7 a recommendation to consider redesigning and re-writing
 8 EPOSS was first made in September 1999?

9 **A.** Yes.

10 **Q.** That was at a time when Post Office Counters was in
 11 negotiation with ICL Pathway over the granting of
 12 conditional acceptance to the Horizon systems. Is that
 13 something that you are familiar with, that resonates in
 14 terms of timings?

15 **A.** Yes. It fits with the timing but, you know --

16 **Q.** So we have a first recommendation in September 1999. It
 17 would appear that --

18 **A.** Which was a recommendation to consider --

19 **Q.** To consider redesigning and rewriting EPOSS?

20 **A.** Right, so I am sure it was considered but what I don't
 21 know is what the result of that consideration was.

22 **Q.** We then have a further recommendation in late
 23 October 1999 to reconsider the recommendation to
 24 redesign and rewrite EPOSS. Could it reasonably be
 25 inferred then that the decision, if it was taken in

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1 September, was not to redesign and rewrite EPOSS?
 2 **A.** I would be guessing or making an inference which is
 3 a bit too strong, I feel. I don't know what to infer
 4 from that. The only thing I get out of that is the fact
 5 that they were going to consider it. It was going to be
 6 looked at and I am sure it would have been looked at
 7 because it was so visible at the time but what
 8 I can't -- what I don't know is what actually happened.
 9 So it was a long-term issue that was running, and me
 10 developing or even doing an exercise on -- well of
 11 course, it takes time and it can take a lot of time. So
 12 it would have been a visible thing. It wouldn't have
 13 disappeared but I just do not know how to find out which
 14 approach to EPOSS was adopted. I just don't know.
 15 **SIR WYN WILLIAMS:** Mr Coombs, can I ask you, do you have any
 16 memory about whether you were consulted about which
 17 choice should be made?
 18 **A.** No, I don't.
 19 **SIR WYN WILLIAMS:** Would you have expected to have been
 20 consulted about it?
 21 **A.** "Consulted" might be a strong word. I would have
 22 expected it to go to one of the change control places,
 23 which I might or might not have been invited -- change
 24 control, because it was somebody sponsoring it, to do
 25 whatever was the outcome, and I may not have been told

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1 **A.** That's the audit. You mean this audit document here?
 2 **Q.** Yes, sorry, the findings made in this audit report. The
 3 recommendation to the effect that EPOSS should be
 4 redesigned and rewritten. To your recollection was that
 5 brought to the attention of Post Office Counters Limited
 6 at the time?
 7 **A.** I'm thinking because -- I will probably talk as I think
 8 because it helps -- look at that, just seeing it, it
 9 depends where -- no. No, I do not have recollection of
 10 that.
 11 **Q.** Do you consider that the findings and recommendations
 12 should have been brought to the attention of Post Office
 13 Counters Limited?
 14 **A.** They may well have been brought but it depends
 15 whether -- it depends on how they entered being passed
 16 over, whether it led to a change in requirements or
 17 a clarification of requirements which means that it
 18 could have happened via requirements directorate which
 19 I would not have necessarily seen unless there was any
 20 outcome. Or if it was handing over another release,
 21 that would be done through the development systems group
 22 and their interfaces with it. So I can see that people
 23 could be brought in, not just using the development
 24 audit, which was there basically to serve a different
 25 purpose than to communicate to the Post Office. So

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1 of it at the time.
 2 **SIR WYN WILLIAMS:** Can I just summarise, you can't remember
 3 whether you were consulted but it is not necessarily the
 4 case that you would have been; is that right?
 5 **A.** That is right.
 6 **SIR WYN WILLIAMS:** Okay, thank you.
 7 **MS HODGE:** Thank you, sir. Mr Coombs, one of the final
 8 documents I propose to take you to is the schedule of
 9 corrective actions which accompanied this report.
 10 Before I do I would like to ask you whether you recall
 11 the findings and recommendations to redesign and rewrite
 12 EPOSS, whether you recall these ever being reported to
 13 Post Office Counters at the time.
 14 **A.** Could I interrupt? Sorry to interrupt. I have got some
 15 noise coming off left, I will shut the door otherwise
 16 I'm not going to hear you. I will be a minute or two.
 17 Is that okay?
 18 **Q.** Of course.
 19 **SIR WYN WILLIAMS:** Of course, please do. **(Pause)**
 20 **A.** Sorry about that.
 21 **MS HODGE:** Thank you, Mr Coombs. My question was whether or
 22 not the findings and recommend -- whether you recall the
 23 findings and recommendations made in this audit report
 24 were brought to the attention of Post Office Counters
 25 Limited at the time.

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1 I have no recollection but it doesn't mean that there
 2 wasn't.
 3 **Q.** My second question, Mr Coombs, is whether you think ICL
 4 Pathway ought to have brought these findings and
 5 recommendations to the attention of Post Office Counters
 6 Limited at a time when Post Office Counters was
 7 considering conditional acceptance of the system and the
 8 implementation of its rollout.
 9 **A.** Yes, it should have done, what I'm saying is I don't
 10 know that it didn't do so. Because there are other
 11 routes and communications, the way it could have come
 12 through. Can you put up your circulation list of the
 13 development audit itself again, just so I can look at
 14 that, and that might help me try and remember.
 15 **Q.** Yes, of course. It is on the first page. But,
 16 Mr Coombs, my question isn't really whether it was as
 17 a matter of fact -- that's something we can explore in
 18 other avenues -- but whether you consider it should have
 19 been. I think your answer is that you do consider that
 20 the findings and recommendations ought to have been
 21 brought to their attention?
 22 **A.** I would consider that the content of the development
 23 audit, not necessarily the development audit itself,
 24 should have been communicated and taken to the customer
 25 and specifically anywhere that mentioned specific

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1 products or processes or things which they had
2 an interest in. So they should specifically have been
3 brought, yes.

4 **Q.** Before we leave, I think you can see there the
5 distribution list --

6 **A.** Yes.

7 **Q.** -- if that assists you at all.

8 **A.** No, it doesn't. (*Unclear*).

9 It might have been one of those that was done with
10 library exchanges. Certain things that would go to
11 their library would automatically come to us and vice
12 versa. But I do not think that is necessarily that
13 helpful, so no. But, yes, it should -- the contents,
14 specifically to do with anything that can affect major
15 problems, should have been brought forwards.

16 But all the individual problems, I am sure, were
17 logged via the known problem register, via the PinICL
18 list. So I think the information would flow. It's
19 whether it flows in a way that is useful.

20 **MS HODGE:** Thank you, Mr Coombs.

21 I propose we take another short break now for about
22 10 minutes before we return to deal with the final parts
23 of your evidence.

24 Sir, is that a convenient time to break?

25 **SIR WYN WILLIAMS:** Yes. What's the time now?

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1 system?

2 **A.** Well, awareness of the PinICLs and bugs and KPRs in the
3 system, that was visible -- they were in part of the
4 loop for actually dealing with that, in terms of impact.

5 I know that happened. The other thing you were asking
6 was where was my head in terms of new versus old EPOSS,
7 was that what I was thinking?

8 Certainly that was in POCL's domain. I have seen
9 somewhere in this process a document that says that but
10 I cannot remember the detail. So there was a link, on
11 the information to do with maintain or redevelop and
12 that was known to POCL and is in a document with POCL
13 people in it but it is somewhere -- I've seen it
14 somewhere which means it is somewhere in the folders
15 around me but I wouldn't know where to pick it out.

16 I think there was knowledge but whether it was the
17 right sort of knowledge, so the key issue for me is: did
18 it include the requirements thing as well? Because that
19 level of change you are talking about, you would need to
20 reset the requirements' baseline to make sure you don't
21 take the product off or swerve away from its intended
22 position.

23 And that would have been under John Dicks'
24 directorship and I have no idea whether that dialogue
25 was had because I would not necessarily have been privy

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1 **MS HODGE:** It is midday.

2 **SIR WYN WILLIAMS:** So 12.10.

3 **MS HODGE:** Thank you.

4 (12.01 pm)

(A short break)

6 (12.11 pm)

7 **MS HODGE:** Good afternoon, sir, can you hear and see me?

8 **SIR WYN WILLIAMS:** Yes, I can, sorry.

9 **MS HODGE:** Mr Coombs, can you hear and see me?

10 **A.** Yes I can.

11 **Q.** Thank you. Before the break, Mr Coombs, we were
12 discussing what, if anything, you recalled about the
13 findings and recommendations recorded in the audit
14 report being brought to the attention of Post Office
15 Counters.

16 In your statement you say that, whilst you do not
17 recall whether or not Post Office Counters was informed
18 about issues with EPOSS, you would have expected them to
19 have been aware, and I would like to explore with you
20 briefly what the basis of that assumption is, please.

21 When you refer to issues with EPOSS, are you
22 referring specifically to the recommendation that it be
23 redesigned and rewritten in light of the poor quality of
24 the code or are you referring more generally to
25 knowledge of the existence of PinICLs and bugs in the

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1 to it.

2 **Q.** The document to which you refer in your statement is the
3 "Report on the EPOSS PinICL Task Force", which we have
4 looked at already. That is FUJ00080690.

5 At paragraph 7.1.2 of that report, if we could
6 scroll down, please, you can see that's on page 16,
7 I think you rely, Mr Coombs, on the reference here to
8 Post Office Counters Limited's involvement. Is this the
9 document to which you were referring just a short time
10 ago?

11 **A.** Who is on the circulation list for this one?

12 **Q.** If we go back to the top, please?

13 **A.** Sorry about this.

14 **Q.** No, not at all. This is an internal ICL Pathway
15 document.

16 **A.** Yes.

17 **Q.** We can see that from its title.

18 Forgive me, to the first page where the distribution
19 is recorded, please.

20 **A.** I'm looking for it. Yes.

21 **Q.** So the names we have there are Terry Austin, Martyn
22 Bennett, David McDonnell and the library?

23 **A.** Terry is on it -- sorry. Mr Austin is on it, that's the
24 systems development directorate, and he had -- he worked
25 through EPOSS a lot more than I did. He would know who

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1 was told at the working level when reviewing what was
 2 issue 1. So that would come up very much at that view.
 3 This is a one-off thing which -- I don't know who asked
 4 for the task force there but I would probably say it was
 5 Martyn Bennett and Terry to try and understand -- as you
 6 can see from the rest of the document. So ...
 7 **Q.** Mr Coombs -- sorry --
 8 **A.** I would not necessarily have expected to see this
 9 document. I know I have but ...
 10 **Q.** Mr Coombs --
 11 **A.** -- it is very difficult actually because I was probably
 12 there -- that's 14 May 2001, wasn't it? By which time
 13 I was in a hospital bed. So anything that was
 14 immediately before this or comes after it, I would not
 15 have seen. But I am sure communication must have
 16 continued and must have occurred and I would have
 17 expected Terry to keep that up.
 18 **Q.** Mr Coombs, what I'm trying to explore with you -- and
 19 I apologise, I have not posed the question very
 20 clearly -- but you have made an assertion in your
 21 statement that you would have expected Post Office
 22 Counters to have been made aware of the issues with
 23 EPOSS; that is correct, isn't it?
 24 **A.** That is correct.
 25 **Q.** I understand by issues with EPOSS that you mean both the

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1 supported by a schedule of corrective actions, is that
 2 right?
 3 **A.** I can't remember specifically but I would have expected
 4 it.
 5 **Q.** We have a copy of the schedule of corrective actions,
 6 which was prepared in connection with the CSR+
 7 development audit carried out in October 1999. Please
 8 could we show FUJ00079783. Mr Coombs, I hope you can
 9 see the title of the document "Schedule of Corrective
 10 Actions"?
 11 **A.** Yes, I can see that.
 12 **Q.** The version is 0.1, in the top right-hand corner and the
 13 document is dated 22 November 1999.
 14 **A.** Yes.
 15 **Q.** A little further down the page, as we have established,
 16 we can see you named on the distribution list.
 17 **A.** Yes.
 18 **Q.** And at the top of this second page please, under the
 19 heading "Document history" we can see a reference to
 20 version 0.1 dated 22 November 1999 and it reads:
 21 "Initial draft [of the schedule] following
 22 preliminary analysis with MJBC", and the date,
 23 17 November, in brackets.
 24 Are those your initials?
 25 **A.** Yes, they are.

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1 occurrence of bugs, errors and defects but also the
 2 specific recommendation that was made to redesign and
 3 re-write the application; is that right?
 4 **A.** Yes, and I would have expected there to be discussion,
 5 at least not -- a discussion I was involved in.
 6 **Q.** What I'm trying to establish is the basis on which you
 7 had that expectation.
 8 **A.** A number of reasons. One of which is there would be
 9 a need to steer us through the acceptance type hurdles
 10 with that product and without some movement or change in
 11 intention or product, then I do not see how that could
 12 occur. It would become a blocker. It all gets tangled
 13 up in broader discussions. And I would have expected in
 14 review -- and I don't know what reviews were going on in
 15 development division -- but there would be reviews which
 16 included then requirements and representatives in POCL,
 17 I know that occurred but I don't know if it occurred for
 18 this. Or whether this was an isolated activity, ie not
 19 connected into mainstream but I can't see how it could
 20 be. I would have an expectation that this was visible
 21 to the customer either via development or via
 22 requirement.
 23 **Q.** Thank you, Mr Coombs.
 24 I understand that it was the practice for each
 25 internal audit carried out by ICL Pathway to be

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1 **Q.** So this would suggest that you had some discussion of
 2 the schedule of corrective actions with its author on
 3 17 November; would that be fair?
 4 **A.** Yes, that would be very fair.
 5 **Q.** On page 3 please we can see at point 3, there is a key
 6 to plan -- what is described as a key to plan, and we
 7 see certain terms are there defined. The term "Owner"
 8 relates to the identified owner of the corrective action
 9 and underneath it the term "MTM"?
 10 **A.** I'm looking at "Key to plan".
 11 **Q.** Forgive me "Key to Plan", in yellow highlight in the
 12 left-hand column, I hope you can see the "Owner"?
 13 **A.** Yes.
 14 **Q.** That's the term used in the plan. It appears to denote
 15 the identified owner of the corrective action.
 16 I understand that to be the individual who is to take
 17 primary responsibility for --
 18 **A.** For progressing and resolving it if it is an issue.
 19 **Q.** Precisely. Underneath "owner", "MTM", which is the
 20 defined as the "management team member to whom the
 21 corrective action owner reports". Bearing those in
 22 mind, if we could please proceed to page 4. The
 23 corrective actions are recorded here in a table and in
 24 the top row we see the "Report Observation or
 25 Recommendation" in the third column, at the top. Can

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1 you see that in bold?
 2 **A.** Yes, I can.
 3 **Q.** The next column along identifies the owner of the
 4 corrective action.
 5 **A.** Yes.
 6 **Q.** The fourth column, the management team member to whom
 7 the owner of the corrective action is to report?
 8 **A.** Yes.
 9 **Q.** You follow that. Thank you. If we could then carry on
 10 please to page 8. **(Pause)**
 11 I'm sorry for keeping you waiting, Mr Coombs.
 12 **A.** That's okay.
 13 **Q.** Under the heading "Report Observation/Recommendation",
 14 we can see the commentary there. The first paragraph
 15 reads:
 16 "The audit identified that EPOSS continues to be
 17 unstable. PinICL evidence illustrated the numbers of
 18 PinICLs raised since the 1998 Task Force and the rate of
 19 their being raised.
 20 "The EPOSS solutions report made specific
 21 recommendations to consider the redesign and rewrite of
 22 EPOSS, in part or in whole, to address the then known
 23 shortcomings. In light of the continued evidence of
 24 poor product quality these recommendations should be
 25 reconsidered."

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1 **A.** That would be relevant to customer services.
 2 **Q.** "... and BD."
 3 Would that be a reference to business development?
 4 **A.** Business development. That is, if I'm reading this
 5 correctly, because we are still on EPOSS, there was
 6 an expectation or a possibility of passing of the
 7 business development forward by offering services to
 8 other people round an EPOSS type situation. So it was
 9 seen as a potential -- business development were looking
 10 at that and business development, as far as I'm
 11 concerned, do not exist.
 12 I refuse to accept they existed because I was just
 13 focusing on the programme, not on what we do
 14 post-programme. That is not my remit. So they could
 15 put that in the action to me, as much as they like, "BD"
 16 and they would all know that they would not get
 17 a response, unless Mr Bennett wanted to enter his name
 18 on this list.
 19 **Q.** Against that entry date of 17 November we see your
 20 initials again, "MJBC to speak with TPA direct".
 21 **A.** Yes.
 22 **Q.** Can you see that? So it appears that you were in
 23 discussions with Mr Austin as to how to action this
 24 recommendation on or around 17 November 1999.
 25 **A.** Yes.

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1 **A.** That's the same as before.
 2 **Q.** Indeed. That reflects the findings that we saw in the
 3 CSR+ development audit.
 4 **A.** And this is, remind me?
 5 **Q.** This is called the "Schedule of Corrective Actions".
 6 Yes.
 7 **A.** And is the follow on from the CSR audit?
 8 **Q.** Precisely. If we look there in the fourth column along,
 9 the owner of this particular action is recorded as
 10 "TPA". Is that a reference to Terry Austin?
 11 **A.** That's Terry Austin, yes.
 12 **Q.** Under the next column, the management team member, who
 13 has been identified as the individual to whom the owner
 14 should report, we have two initials, "JHB", the first,
 15 would that be John Bennett.
 16 **A.** That is John Bennett.
 17 **Q.** The second are your initials, MJBC?
 18 **A.** Yes.
 19 **Q.** Thank you. In the final column, please -- sorry, the
 20 penultimate column, under "Agreed Action/Commentary", we
 21 see a number of dated entries. The first of these is
 22 dated 17 November. It provides:
 23 "This action falls within Development but requires
 24 higher level drive. Has links with CS ..."
 25 Would that be reference to customer services?

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1 **Q.** I think that follows from what we can see here.
 2 **A.** Yes.
 3 **Q.** Then, in the following entry, dated 25 November, albeit
 4 it is not entirely clear who has made this entry, what
 5 we see recorded as work on AI298, which was the
 6 Acceptance Incident relating to counter lockups and
 7 freezes, identified that --
 8 **A.** Can you just run back through that? You lost me as to
 9 which documents --
 10 **Q.** Yes, of course, forgive me. We are looking at the
 11 column entitled "Agreed Action/Commentary".
 12 **A.** That is the one that has been magnified for me, so I can
 13 read it.
 14 **Q.** Exactly. That's one of several columns in the schedule
 15 of corrective actions.
 16 **A.** Yes.
 17 **Q.** These are agreed actions and commentaries against the
 18 recommendation to reconsider the proposal to redesign
 19 and rewrite EPOSS.
 20 **A.** These are all the ones that come under 4.2.1?
 21 **Q.** Precisely.
 22 **A.** I'm with you now.
 23 **Q.** Not at all. Thank you. So the entry on 25 November
 24 reads as follows:
 25 "Work on AI298 [which we have discussed earlier in

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1 your evidence as an Acceptance Incident in relation to
 2 counter lockups and freezes] identified that majority of
 3 problems ([approximately] 80%) were to do with error and
 4 print error handling. Daily meetings had been
 5 instigated. TPA of view that while original code had
 6 not been good it would be difficult to justify the case
 7 for rewriting now."

8 **A.** Yes.

9 **Q.** Does that entry resonate at all with you in relation to
 10 your recollection of your discussions with Terry Austin
 11 at that time?

12 **A.** No, my discussions with Terry were much more about --
 13 I am sure, with Terry, was much more about which
 14 version, was there going to be a development or was
 15 there going to be a maintenance thing, rather than this.
 16 It is quite difficult to link some of these back to each
 17 other, isn't it? It is quite tortuous.

18 **Q.** I think it might help, Mr Coombs, if we go to a later
 19 version of this document. It is a version dated
 20 May 2000 and it is at WINT04600104.

21 We have seen in the top right-hand column this is
 22 version 2.0 --

23 **A.** Yes.

24 **Q.** -- produced on 10 May. It is substantially the same as
 25 the November version, save that it includes some

1 **A.** I don't recognise it. It is a person so I would assume
 2 it is release management.

3 **Q.** It says --

4 **A.** Is it possible just to go right a little bit? The blown
 5 up bit, I'm missing the right-hand side. That's it.
 6 The dates weren't showing.

7 **Q.** It also says at the first entry, dated 8 December:

8 "Also informed TPA [Terry Austin] that requires
 9 agreement of MJBC before this can be closed."

10 **A.** Yes.

11 **Q.** So we had earlier a recommendation from Terry Austin
 12 that there wasn't a proper case for redesigning and
 13 rewriting the EPOSS code and that the recommendation
 14 should accordingly be closed but it appears that that
 15 recommendation to close the action was subject to your
 16 agreement. Does that seem right?

17 **A.** Yes, it was, and initially I wasn't happy. I'm trying
 18 to remember what happened.

19 **Q.** A further entry -- sorry, Mr Coombs.

20 **A.** No, it is okay. Carry on.

21 **Q.** A further entry on 8 December records that your initials
 22 MJBC:

23 "... confirmed that unless RM statistics
 24 contradicted reports provided by PJ", which I believe is
 25 Peter Jeram.

1 additional commentary and agreed actions.

2 If we could scroll down to page 7, please.

3 Apologies, it is at page 9, for the record. Mr Coombs,
 4 you should be able to see what is essentially the same
 5 table as we have been looking at, a short time ago, with
 6 the reports, observations and recommendations in the
 7 third column from the left, and the agreed action and
 8 commentary in the second column in from the right.

9 We discussed very briefly the entries of 17 November
 10 and 25 November. If we carry on, please, to page 10.

11 **A.** Before you do, can I just finish reading something?

12 **Q.** Please, by all means.

13 **A.** Yes. Sorry about that.

14 **Q.** I think you have said that the entry dated 25 November
 15 doesn't assist particularly in recollecting what you
 16 discussed with Terry Austin at the time in relation to
 17 this recommendation; is that right?

18 **A.** Yes.

19 **Q.** What we can see on the following page is some further
 20 entries. The first is dated 8 December. It records
 21 that:

22 "JH requested statistics on fixes delivered to live
 23 from RM."

24 What "RM" be a reference to release management, do
 25 you think?

1 **A.** Yes.

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

3 **A.** Yes.

4 **Q.** Do you have any recollection of that?

5 **A.** I have the recollection of the discussion with Terry.
 6 Yes, you can see there my view was that it needed
 7 closing -- I'm trying to remember what we were talking
 8 about. We are talking about EPOSS again, aren't we?

9 **Q.** Yes, there appears to be some consideration as to
 10 whether or not the volume of PinICLs and fixes were such
 11 that it was right to approve closure of the report.

12 Does that seem broadly --

13 **A.** It now rings a bell. The question was quite a simple
 14 one and that is: had the number of errors that had
 15 occurred reduced in volume of those coming in and had
 16 sufficiently been cleared, including in the key areas
 17 for us to close the report and continue with the
 18 product. I had forgotten this one completely.

19 **Q.** So that appears to be the position as at 8 December,
 20 namely that inquiries needed to be made as to the volume
 21 of PinICLs and fixes in order to ascertain whether or
 22 not it was proper to close down this recommendation.

23 The next entry on 7 April refers to an email to you,
 24 MJBC, Terry Austin and Peter Jeram, "providing details
 25 of RM. EPOSS fixes to live".

1 A. Provided the information.
 2 Q. It appears that was provided as requested, and the
 3 email:
 4 "Asked for confirmation that matched PJ reports ..."
 5 So, asking for confirmation as to whether that
 6 matched Peter Jeram's reports:
 7 "If it does then will close."
 8 The next entry, we see, is dated 3 May.
 9 A. Hold on. Yes, 3 May.
 10 Q. That records that a "Reminder email [has] been sent to
 11 [the] above", I assume that means you, Terry Austin and
 12 Peter Jeram --
 13 A. Yes.
 14 Q. -- "seeking early response"?
 15 A. Chased on the same day.
 16 Q. "Chased on same day."
 17 So that's approximately one month later in early
 18 May.
 19 A. Yes.
 20 Q. It appears that confirmation that EPOSS fixes to live
 21 were matching Peter Jeram's reports hadn't been
 22 provided, at least at that stage. Is that a reasonable
 23 inference?
 24 A. Yes. I will hold that thought while you continue.
 25 Q. Thank you, Mr Coombs.

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1 Q. Let's break it down a little, Mr Coombs. It appears
 2 this was a collective decision of the management team;
 3 is that correct?
 4 A. I'm not certain. At this time, it may not have been
 5 because I believe, at this time, John Bennett had
 6 recently -- or during this process, at some time, John
 7 Bennett moved on and Mike Stares arrives. So it might
 8 have been a partial management team agreement, because
 9 I don't know how up to speed Mike Stares would have been
 10 at this stage. John Bennett's name was there,
 11 obviously, because it has commercial impact, and mine
 12 because it had programme impact.
 13 Q. Whether or not Mr Bennett played a part in that
 14 decision, it appears that you weren't the sole
 15 decision-maker, it was something that had been discussed
 16 amongst the management team, at the time?
 17 A. Discussed amongst the management team, and so there's
 18 myself, there's Terry Austin, there's Martyn Bennett, as
 19 well as people like Pete Jeram, who is a senior member.
 20 So, yes, it was a discussion based on the then view of
 21 members of PinICLs -- outstanding PinICLs coming in and
 22 PinICLs going out.
 23 So the decision was made, which I had forgotten all
 24 about completely -- a decision was made to continue with
 25 the existing product. Unless it needed to be open for

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1 Finally, an entry dated 10 May, which records:
 2 "Following response received from MJBC ..."
 3 The following entry is in quotation marks and,
 4 therefore, presumably reflects the content of an email
 5 or a conversation you had had with the author. It says:
 6 "As discussed this should be closed. Effectively as
 7 a management team we have accepted the ongoing cost of
 8 maintenance rather than the cost of a rewrite. Rewrites
 9 of the product will only be considered if we need to
 10 reopen the code to introduce significant changes in
 11 functionality. We will continue to monitor the code
 12 quality (based on product defects) as we progress
 13 through the final passes of testing and the introduction
 14 of the modified [C14] codeset into live usage in the
 15 network. PJ can we make sure this is specifically
 16 covered in our reviews of the B&TC test cycles."
 17 It is then recorded that the recommendations and
 18 agreed actions are closed. Do you see that as the final
 19 entry?
 20 A. Yes, I do. This is the missing bit of information
 21 I didn't have in my head that made me uncertain about
 22 all the discussions on EPOSS. It didn't lead anywhere,
 23 and it had to lead somewhere, and I've never seen where
 24 it leads to. I would never have amended this level of
 25 detail without prompting.

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1 any future reasons but I don't know whether that effort
 2 occurred since, so I don't know.
 3 Q. What we see there is, effectively, you are recorded as
 4 saying the management team have accepted "the ongoing
 5 cost of maintenance rather than the cost of a rewrite".
 6 A. Yes.
 7 Q. By the "cost of maintenance" did you mean the ongoing
 8 cost of applying fixes to bugs, errors and defects as
 9 and when they were identified in the system?
 10 A. That is certainly one thing and the other is also -- it
 11 was the air of change. So it was -- there is
 12 a reference there to -- it would only be done by
 13 maintenance unless there was a need to open the product
 14 to make significant changes. If I remember correctly,
 15 there was always a possibility that that could occur as
 16 further requirements came or were clarified from Post
 17 Office.
 18 Q. So is it right to infer, Mr Coombs, that rather than
 19 addressing the underlying problem, namely the quality of
 20 the EPOSS code, the management team decided in May 1999
 21 to continue in the practice of applying software fixes
 22 to the product?
 23 A. Having looked at the figures produced by Pete Jeram to
 24 say whether that was a sustainable position, the view
 25 must have been that it was. Because the decisions to

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1 rewrite products are actually large ones to make because
2 you can introduce other faults, other problems,
3 interface issues and the rest. So that was a management
4 decision made by group of management that the product
5 was sufficient -- sufficiently developed and cleaned to
6 be usable by systems.

7 **Q.** Forgive me. The CSR development audit report, to which
8 this schedule of corrective actions related, had
9 reported that the application of software fixes was
10 liable itself to cause a further deterioration in the
11 quality of the EPOSS code. Do you recall that specific
12 concern being raised?

13 **A.** No, you mentioned it before and that's when I started
14 saying that sometimes you need to understand who, or
15 what organisation they are in, making these comments to
16 understand how possible it is to go with them. It could
17 be a subjective view rather than anything --

18 **Q.** You have explained that you yourself were a programme
19 manager not a technical expert. Did you not trust the
20 opinions of those who had been entrusted with the task
21 of producing, developing and rectifying the problem --

22 **A.** I trusted them and they carried on working and doing
23 work on it but the point I'm making is that there were
24 people who had different views on whether it should be
25 maintained or be re-written. Those different views can

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1 **A.** The situation of doing maintenance on a product will --
2 one thing to remember is this a long ongoing saga with
3 the product. So that things have changed as we go
4 through and certainly there was a need to get down a lot
5 of the PinICLs situation -- the only way I can answer
6 your question about the efficacy of the decision is by
7 understanding what's happened since.

8 It is one of those -- you only know if you are right
9 on the development when it has actually been done. The
10 key thing was there was a lot of people looking at it
11 and a lot of work had gone in to come to a conclusion.
12 I can only -- without any further information -- like
13 historic information since then, in the 20-odd years to
14 see what actually happened -- I don't see how I can say
15 anything other than, my memory was that it was closed
16 and a decision was made. Whether it is right or wrong,
17 is a different question for other people.

18 **Q.** At the time when this decision was made, you were alive,
19 were you not, to the risk that the application of
20 software fixes could cause a degradation in the
21 performance of the EPOSS code -- were you not -- by
22 10 May 1999.

23 **A.** I was aware of that that was a view and that that was at
24 the heart of the question, which was the best way
25 forward, was it -- which was the best way forward for

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1 come through as being fact rather than just being
2 a view. So, given that there's the outcome of work done
3 from Pete Jeram and release management information that
4 eventually came to the conclusion that it was
5 sustainable, yes that might appear to be at odds and it
6 might indeed be at odds with the previous statement to
7 do with code degeneration. But that was known and with
8 the overall view that was (unclear), and management
9 decision, was that the interests of the programme, and
10 hence Pathway, were best served by actually continuing
11 with it on the maintenance basis that I have mentioned.
12 So I think it is a valid thing to do. But it relies
13 on -- and who would I actually prefer to believe,
14 somebody in release management or Peter Jeram? That is
15 difficult because I know Peter very well. He is
16 a pragmatist who gets things done.

17 **Q.** If the -- sorry, Mr Coombs, I didn't mean to interrupt
18 you.

19 **A.** No, I have finished.

20 **Q.** If the authors of the audit report were right, that the
21 application of software fixes -- the continued
22 application of software fixes was liable to lead to
23 a degeneration in the EPOSS product and its code, rather
24 than providing a solution to the problem did this
25 decision not simply make the situation worse?

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1 the overall reasons in terms of costs, sustainability
2 and the rest and that was the view that we came to.

3 Some people might say it was the wrong decision.

4 **Q.** We have an exchange of emails in May 2000. Please could
5 we turn up FUJ00079333. Mr Coombs, we see the first
6 email, or more correctly the last email, in the chain is
7 dated 10 May 2000, sent at 6.28 pm. It is from you to
8 Terry Austin and Stephen Muchow -- I believe, is the
9 corrected pronunciation.

10 The subject of the email is "The current issue on
11 [C14] EPOSS".

12 **A.** Yes.

13 **Q.** Do you recall what "C14 EPOSS" was?

14 **A.** I cannot tell you how it differs from any other EPOSS.

15 **Q.** I believe it was --

16 **A.** -- I do not understand the "C14" bit.

17 **Q.** I believe it was a new software release, relating to
18 EPOSS that was due to be implemented as part of the Core
19 System Release Plus. Does that ring any bells?

20 **A.** None at all.

21 **Q.** If we look down to the body of that email, it reads:

22 "Steve,

23 "As a group we need to address your concerns. Can
24 you please add these to the migration meeting you are
25 calling for the week I return from leave.

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1 "Mike C."
 2 I think, to understand those concerns, to what you
 3 are referring, we need to scroll down to the email from
 4 Stephen Muchow, which is dated 27 April -- if we go down
 5 a little bit further, please.
 6 **A.** 27 April 2000.
 7 **Q.** That is right. We can see that timed at 19.15 on
 8 27 April, from Stephen Muchow to you and Terry Austin.
 9 It reads:
 10 "Mike/Terry,
 11 "Please see below, report from Pat Lywood on [C14]
 12 implementation.
 13 "I am particularly concerned with the risks of
 14 degraded counter and cash account performance and of
 15 code regression between [C13] and [C14]. Also, given
 16 the dependence on [Post Office] Backfill Training but
 17 without the benefit of experience of PONU's (which
 18 I think is Post Office Network Unit) track record on
 19 this activity -- there must be significantly increased
 20 risk that HSH (the Helpdesk service) performance against
 21 SLAs will be severely impaired.
 22 Regards Stephen."
 23 If we scroll up, we can see Terry Austin's response
 24 on 10 May, shortly before your own. It reads:
 25 "Steve, I share your concerns regarding counter

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1 the possibility of this occurring to an absolute minimum
 2 and I have recently requested a reconciliation where it
 3 is possible to do so.
 4 "I also have no faith in PO backfill training but
 5 I'm not sure how I can help mitigate the risk. PO have
 6 an obligation to understand the implications on the
 7 counter of all the changes they have requested and
 8 ensure that the staff are informed and trained
 9 appropriately."
 10 So the terms used repeatedly in this exchange are
 11 "counter performance" and "code regression". What did
 12 you understand by the term code regression?
 13 **A.** Well, I do not know what I understood at the time but
 14 what I would understand now is the worst sort of
 15 regression is where you find that problems reoccur that
 16 you got rid of in a previous release, you regress in
 17 terms of functionality and performance, or something.
 18 So that's what it would be but it doesn't tell me what
 19 it is.
 20 **Q.** What this appears to show, Mr Coombs, is that on
 21 10 May 2000, the very day on which the decision was
 22 either made or recorded to close the recommendation to
 23 rewrite and redesign EPOSS, it was brought to your
 24 attention that code regression appeared to be occurring
 25 in the EPOSS application. Is that a fair reading of

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1 performance and code regression. To that end we are
 2 focusing on those areas of functionality where we appear
 3 to be experiencing performance degradation and
 4 attempting to establish where the problem lies."
 5 Do you follow me, Mr Coombs?
 6 **A.** I follow you. I know exactly where you are in the
 7 paragraph.
 8 **Q.** Thank you:
 9 "I have been personally aware of these problems for
 10 several weeks and would not expect CS to authorise [C14]
 11 unless these issues were resolved. I have raised the
 12 issue of extra work during weekly balancing with Mike
 13 who will be discussing it with Dave Smith."
 14 Dave Smith was an employee of Post Office Counters,
 15 I think, at the time?
 16 **A.** Yes, he was my equivalent in Post Office Counters.
 17 **Q.** "This has been introduced by [Post Office Counters
 18 Limited] to support LFS."
 19 Do you know what LFS refers to, Mr Coombs?
 20 **A.** No, I don't.
 21 **Q.** I think it might be the logistics feeder service:
 22 "I cannot give you a 100% guarantee that code
 23 regression will not occur at [C14] because by its very
 24 nature it is not fully automated and never will be.
 25 However, our end to end processes are designed to reduce

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1 this?
 2 **A.** That there was a risk of code regression, and a concern
 3 but that people were alive to it.
 4 **Q.** Did these concerns cause you to --
 5 **A.** Sorry. I can see you now. I have lost the document.
 6 **Q.** We can bring it back up if you like?
 7 **A.** Continue.
 8 **Q.** Did these concerns cause you to reconsider the decision
 9 not to redesign or rewrite the EPOSS product?
 10 **A.** Anything I say is going to be, sort of, with a hindsight
 11 view 20 years on, where I'm sitting at the moment, and
 12 I would say, I will always look at reconsidering it if
 13 I felt there was a need. But what I don't understand
 14 sufficient of is the nature.
 15 What I would have done is had a discussion with
 16 Terry and Steve and try to understand the concerns that
 17 were coming in and whether it was deemed to be real.
 18 Code regression happens. Sometimes it is
 19 a nightmare, sometimes it is not. I see where you are
 20 coming from in terms of what you are actually showing me
 21 is concerns about EPOSS, which is a fundamental product,
 22 and I understand why. I don't really see what else
 23 I can add on that one. Because, yes, I would be not
 24 happy about the fact that there was regression going to
 25 be found and I would do something about it with the

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1 people there. How successful that would be, who can
 2 say.
 3 The decision has been made and it took a long time
 4 to take a decision, so if I was given that today in
 5 front of me as an option, would I do a new product?
 6 I might, but not until I had done a lot more work in
 7 understanding whether the improvements implied by Pete
 8 Jeram and through the group have been proven to be right
 9 or not. So it would have required more work.
 10 No, I think it would be a bit premature to imply
 11 that there was regression because somebody said there
 12 might be regression in the future.
 13 **Q.** Mr Coombs, did it --
 14 Sorry, I apologise for interrupting.
 15 **A.** No, I finished.
 16 **Q.** Bearing in mind the decision-making we saw recorded in
 17 the schedule of corrective actions, did it simply come
 18 down to balancing the likely cost of a full redesign and
 19 rewrite of EPOSS against the ongoing cost of software
 20 fixes? Is that what was ultimately determinative of
 21 this decision?
 22 **A.** That was, I believe, effectively where we ended up.
 23 A decision was made that the product was sufficient
 24 after all the work that had been done looking at it and
 25 trying to improve it. We thought it was the best

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1 Ms Hodge pulled up for you to look at included, as one
 2 of the recipients, a man called Gareth Jenkins.
 3 **A.** Yes.
 4 **SIR WYN WILLIAMS:** Did you know Mr Jenkins?
 5 **A.** Yes, I did.
 6 **SIR WYN WILLIAMS:** Can you tell me what his position in ICL
 7 was --
 8 **A.** Who?
 9 **SIR WYN WILLIAMS:** -- or partly? What his position was as
 10 far as you are aware?
 11 **A.** I thought he was in the development group.
 12 **SIR WYN WILLIAMS:** So he was in the development group.
 13 **A.** Nothing to do with Pathway. If I'm thinking of the
 14 right Gareth Jenkins, he was in the development group up
 15 in Manchester. I might be thinking of the wrong Gareth
 16 Jenkins.
 17 **SIR WYN WILLIAMS:** All right. Can we just put that email
 18 chain up again because it is not just Gareth Jenkins,
 19 there are two letters after him.
 20 So if you scroll down slightly, so we get just above
 21 the bolder type -- "Steve, I share your concerns" -- you
 22 see there is a list of the people to whom that email was
 23 copied and the last but one is "Jenkins Gareth, GI".
 24 That is the person I'm asking about.
 25 Do you know who that is, Mr Coombs?

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1 option, because there is always a risk when you start
 2 redesigning a product from scratch -- especially in the
 3 environment which we were facing, where there were
 4 problems with requirements creep, from when I first got
 5 along, if anybody went near to open it, then another
 6 idea would come from somewhere amongst the sponsors of
 7 the development that would be useful. We also took that
 8 into account.
 9 **Q.** Finally, Mr Coombs, because we are almost at the lunch
 10 break but I think I can finish very shortly. Were you
 11 aware, during your time working as programme director,
 12 that Post Office Counters Limited were intending to
 13 place reliance upon data recorded on Horizon to support
 14 the bringing of civil and criminal proceedings against
 15 subpostmasters and office managers suspected of fraud?
 16 **A.** I didn't have the faintest idea they were considering
 17 using the information and I had no idea at all they were
 18 considering taking the step of prosecuting members of
 19 their own organisation. I had no knowledge of any of it
 20 at all, with respect.
 21 **MS HODGE:** Thank you, Mr Coombs, I have no further questions
 22 for you. The chair may have some before you are
 23 released.

Questioned by SIR WYN WILLIAMS

24 **SIR WYN WILLIAMS:** Mr Coombs, that last email chain that
 25

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1 **A.** No, I don't. I know a Gareth Jenkins but, as I said,
 2 I thought he was up in Manchester. This one, it could
 3 be the same and end up here. But I don't know him and
 4 I don't understand "GI".
 5 **SIR WYN WILLIAMS:** All right then. That's fine. Thank you
 6 very much.
 7 Are there any other questions for Mr Coombs by
 8 anyone?
 9 **MS HODGE:** No, sir.
 10 **SIR WYN WILLIAMS:** Then I think that completes your evidence
 11 Mr Coombs and I'm very grateful to you taking the time
 12 and trouble to give evidence to the Inquiry. Thank you
 13 very much.
 14 So we will break now until, shall we say, 2.10 pm?
 15 Will that give sufficient time this afternoon?
 16 **MS HODGE:** Yes, thank you, sir.
 17 **SIR WYN WILLIAMS:** Fine. 2.10, then everyone.
 18 (1.06 pm)
 19 (The short adjournment)
 20 (2.10 pm)
 21 **SIR WYN WILLIAMS:** Good afternoon, Mr Sweetman.
 22 **THE WITNESS:** Good afternoon, sir.
 23 **MR STEVENS:** Sir, we are waiting to see Mr Sweetman.
 24 I hope you don't mind, sir, I took the liberty of
 25 telling Mr Sweetman he could take off his jacket to give

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1 evidence.

2 **SIR WYN WILLIAMS:** That's fine.

3 **STUART SWEETMAN (affirmed)**

4 **Questioned by MR STEVENS**

5 **MR STEVENS:** Please could you state your full name?

6 **A.** Stuart John Sweetman.

7 **Q.** Mr Sweetman you should have a witness statement in front

8 of you running to 11 pages, could I just ask you to have

9 that to hand?

10 **A.** Yes, I have.

11 **Q.** It is dated 21 September 2022. Could I ask you to turn

12 to page 11 of that statement?

13 **A.** Yes.

14 **Q.** Is that your signature?

15 **A.** Yes, it is.

16 **Q.** Is the content of this statement true to the best of

17 your knowledge and belief?

18 **A.** Yes, it is.

19 **Q.** Thank you, Mr Sweetman. Your statement now stands as

20 evidence for the Inquiry. I want to start by asking you

21 a few questions about your professional background. You

22 qualified as a chartered accountant in 1973; is that

23 right?

24 **A.** That is correct.

25 **Q.** You joined the Post Office in 1982 --

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1 that sort of thing. Then became assistant managing

2 director of Royal Mail and I was, amongst other things,

3 responsible for strategic direction of the Mail's

4 processes.

5 And then I eventually was invited to become MD of

6 Post Office Counters.

7 **Q.** When you became MD did you have any background in IT?

8 **A.** Yes, quite a lot as a project sponsor, one of my early

9 roles in financial accounting. We, as a corporation,

10 I think, at that stage, only had five accountants and no

11 modern accounting systems. We just had the cash

12 accounting system which was a laborious set of processes

13 from which we pulled out financial accounting

14 information.

15 I was the project sponsor for introducing a complete

16 billing and invoicing and debtor control system across

17 the whole of the corporation. The payroll system was

18 mine to develop as a sponsor. This is the purchasing

19 and bought ledger activity we computerised and I was

20 responsible for the centre of accounting systems.

21 So I was never a techie but I was a finance expert

22 who wanted better systems and I oversaw the development,

23 the implementation and the delivery of all those systems

24 throughout the combined Post Office.

25 **Q.** How did those systems or projects compare in scale and

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1 **A.** Correct.

2 **Q.** -- becoming managing director of Post Office Counters on

3 14 May 1996?

4 **A.** Yes.

5 **Q.** In your witness statement you say that you held various

6 roles at the Post Office prior to your appointment as

7 managing director. What were they?

8 **A.** Initially I was director of financial accounting, which

9 was one of two finance positions underneath the board.

10 I was essentially chief bookkeeper. I kept the

11 accounting records of the whole of the then Post Office,

12 which was the combined operations of letters, parcels

13 and counters. I ran the large accounting function,

14 which was principally based in Chesterfield, where all

15 the cash accounting from branches came in and all the

16 information from the mails businesses came in.

17 It was my responsibility to produce monthly

18 accounts, which went through to the management

19 accounting team, to produce the annual accounts, which

20 were then audited by the external auditors.

21 I then moved on to a number of posts in the Group.

22 I was business centres director, where my role was to

23 create and run -- I think it was about eight or nine

24 business centres where we put all the overhead

25 activities into profit centres, catering, engineering,

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1 complexity to that of the Horizon project?

2 **A.** Well, in that they were breaking new ground within the

3 corporation, we were putting in new qualified

4 accountants at the head post offices, which I think were

5 about 120 at the time, and putting in commercial double

6 entry bookkeeping systems was quite radical. And I had,

7 I think, a development team, an implementation team of

8 several hundred and, yeah, it was quite a challenge but

9 we managed it.

10 **Q.** Turning then to the structure of the Post Office Group.

11 You were, as you say, MD of Post Office Counters, which

12 was one business within the Group, and the chief

13 executive of the Post Office Group was John Roberts.

14 **A.** Yes.

15 **Q.** We heard from John Roberts on 20 October. Did you

16 listen to his evidence?

17 **A.** I have seen some of it.

18 **Q.** He said that you, as managing director, were his direct

19 report; is that correct?

20 **A.** Yes, one of a number.

21 **Q.** In his evidence, he said that the Post Office board, the

22 Group board, was responsible for setting the strategy of

23 the business and once the board had set the strategy, it

24 was for managing directors, such as yourself, to deliver

25 it; would you agree with that?

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1 **A.** Yes, I would. I would have proposed some of those
 2 strategies which the board would have discussed,
 3 considered, amended and then decided. They would then
 4 have been turned into personal objectives by John
 5 Roberts and then it was my job to lead my team to take
 6 that strategic direction, those objectives and deliver
 7 them.

8 And that meant delivering what I would call business
 9 as usual, running the counters business, on a day-to-day
 10 basis, but also being responsible for change management,
 11 such as the Horizon project, where we get teams of
 12 people together to actually deliver on the changes
 13 required from one state to another state.

14 **Q.** Horizon was of significant strategy importance to Post
 15 Office Counters, we have heard that in evidence. What
 16 was your understanding of its importance to Post Office
 17 Counters when you became managing director?

18 **A.** Well, thinking back and looking at the dates, around
 19 that April/May time, when I was appointed, Richard
 20 Dykes, who was the previous MD of Counters, and his
 21 team, and working with John Roberts, had evaluated
 22 "Tom", "Dick" and "Harry" and, initially, those three
 23 terms didn't mean anything to me. But, in that first
 24 few weeks after I was invited to take up the role,
 25 I then got briefed on all the work that had been done to

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1 **A.** Yes.

2 **Q.** I should have said, did you appoint him?

3 **A.** Yes, because he was part -- that role was a senior role
 4 within the Post Office and we had a corporate personnel
 5 function led by Jerry Cope, and was a small team, and
 6 all significant senior appointments would have been done
 7 under their auspices. They made sure the process was
 8 fair, any interviewing that was done was done properly,
 9 that it was all done as per the sort of rule, and so I,
 10 ultimately, would have made that decision. Yes, I want
 11 Dave Miller to do that role.

12 **Q.** Can you recall if you had any other candidates before
 13 you or why you picked Mr Miller over anyone else?

14 **A.** I can't remember if there was a lot of choice. Dave
 15 Miller was chosen because of his strengths. I had seen,
 16 in my earlier jobs, computer systems run by techies and
 17 they normally go wrong because there is no ownership by
 18 line management. Dave had come out of -- I think, it
 19 was the South West region of counties and was a very
 20 well respected line manager of the business of running
 21 Post Offices. He was also a pretty hard-nosed manager.
 22 He called a spade a spade and was quite driven and those
 23 attributes, to me, is what a programme director was all
 24 about.

25 **Q.** You referenced programmes being run by "techies".

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1 evaluate the various proposals.

2 And, at that stage, it became very, very clear that,
 3 unless counters developed a modern front end delivery
 4 system of services, it was not going to survive. The
 5 marketplace was eating our lunch. Technology would eat
 6 our lunch and, unless we got in there, we would not
 7 survive as a network.

8 When I took over, I think there was 19,000/20,000
 9 outlets and all the modeling which had gone on showed
 10 that if we didn't keep our major clients, if we didn't
 11 computerise or offer new services, we would go belly up
 12 and have to shrink the network massively, lose a lot of
 13 employees and that is not a change of management that
 14 I was in any way interested in.

15 **Q.** Is it fair to say, when you came on as managing director
 16 and read these briefs, you took responsibility for
 17 delivering Horizon to keep the business running?

18 **A.** Absolutely. I got briefed up and I think in the very
 19 first few days of my formally taking up the role, I had
 20 to sign and initial a document with Pathway or ICL,
 21 I can't remember which.

22 **Q.** I will come to that in a moment. I want to just jump
 23 slightly ahead in the chronology. In 1998, you
 24 appointed a programme director, David Miller; is that
 25 right?

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1 Mr Miller's evidence was that he was conscious that he
 2 didn't have a technical background, which I think you
 3 have alluded to. Where in Post Office Counters would
 4 you go for IT expertise at this time?

5 **A.** We did recruit a number of our own IT specialists to
 6 fulfil particular roles, those roles which interfaced
 7 closely with Pathway. We did have a corporate IT
 8 function. I think that was run by Duncan Hine but
 9 various people changed. But we had a IT function who
 10 ran the central big systems of the Post Office, had the
 11 resources to advise line managers and so they were
 12 available to be called upon.

13 **Q.** You say Mr Miller reported directly to you?

14 **A.** Yes.

15 **Q.** He was programme manager, you would have received
 16 information about the progress of the Horizon programme
 17 from him?

18 **A.** Yes, I would have.

19 **Q.** Did you listen to Mr Miller's evidence on 28 October?

20 **A.** Again, I have seen some of it.

21 **Q.** His evidence was that you were his defined channel of
 22 communication to the Post Office Group board for any
 23 problems with the Horizon system; is that fair?

24 **A.** Yes, I think it is fair.

25 **Q.** He also said in evidence that he would meet with you to

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1 discuss matters with Horizon on a regular basis; would
 2 you accept that?
 3 **A.** Yes, all my direct reports, we had at least monthly
 4 meetings formally, where we went through objectives and
 5 deliverables and what we promised each other the
 6 previous month, and then a lot of ad hoc meetings. And
 7 Horizon generated -- vague memory -- huge numbers of
 8 ad hoc meetings.
 9 **Q.** I would like to take you to a letter that was shown to
 10 Mr Miller in evidence. The reference is POL00090839.
 11 If we could turn to page 2, please.
 12 **A.** That will come up on the screen, will it?
 13 **Q.** It should do, yes.
 14 **A.** Nothing's coming up yet. Ah. Yeah, that's to Jeff
 15 Triggs who was a very clever lawyer at Slaughters.
 16 **Q.** On page 2, this is a letter from Ernst & Young to David
 17 Miller on 23 August 1999. Ernst & Young were the
 18 auditors of the Post Office at this point, weren't they?
 19 **A.** Yes.
 20 **Q.** The opening paragraph provides that this was:
 21 "... to provide ... our views in respect of certain
 22 accounting integrity issues arising from tests performed
 23 by POCL on Horizon data in live trial."
 24 Can you recall seeing this letter at the time?
 25 **A.** I don't recall but I have read it.

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1 outlet from daily Horizon polings. At present this
 2 control test is showing discrepancies in that certain
 3 transactions do not record the full set of attributes
 4 and this results in the whole transaction being lost
 5 from the daily polling."
 6 So this is whole transactions being lost from the
 7 daily polling.
 8 It goes on to say:
 9 "We are informed that an incident has also occurred
 10 where transactional data committed at the counter has
 11 been lost by the Pathway system during the creation of
 12 the outlet cash account and has not therefore been
 13 passed to TIP [that is the Transaction Information
 14 Processing Services] in the weekly cash account sub
 15 files."
 16 If we turn over the page to page 3, please. Second
 17 paragraph:
 18 "It is a fundamental of any accounting system that
 19 it provides a complete and accurate record of all
 20 transactions. These discrepancies suggest that the ICL
 21 Pathway system is currently not supporting this
 22 fundamental."
 23 Then below the impact the letter considers what
 24 these data integrity concerns had on the auditor's
 25 opinion. If you could go down to:

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1 **Q.** David Miller said, in his evidence, that it may have
 2 been you who requested this input from Ernst & Young.
 3 Can you recall that?
 4 **A.** I'm not surprised he says that because it could well
 5 have been true. Because of my professional background,
 6 having audited the Post Office, I kept quite close with
 7 Ernst & Young and their partners and managers and
 8 I trusted their input and their independence and I could
 9 well have suggested to him -- because I think this was
 10 the stage where it was getting very fraught and I think
 11 we were having very hard nosed discussions with Pathway
 12 and I think we probably would have wanted to demonstrate
 13 to Pathway that they needed to really get their act
 14 together. They needed to do the improvements that we
 15 still wanted and to have a letter like this from our
 16 auditors saying, "If you don't get your act together you
 17 are in trouble" would have been, in our relationship
 18 with Pathway, I think, useful, because it gave us a bit
 19 of clout.
 20 **Q.** If we could scroll down a bit, to the bottom, we see it
 21 says "Incident 376", which is an Acceptance Incident
 22 that we will come back to. But it says:
 23 "Incident 376. Data integrity -- In order to test
 24 the integrity of weekly polling of Horizon cash account
 25 transactions, POCL are reconstructing a weekly total by

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1 "Given the above background, if these matters
 2 remained unresolved at the accounting year end, we would
 3 need to consider whether an unqualified opinion were
 4 appropriate. Under the present circumstances there
 5 appear to be a number of uncertainties whose financial
 6 impact cannot be quantified and which make
 7 an unqualified opinion unlikely to be available to us.
 8 "Should this be the case, we would have to decide
 9 between including a fundamental uncertainty paragraph in
 10 our opinion or issuing a qualified audit opinion."
 11 Now, Mr Miller's evidence says that this was a very
 12 significant issue. Would you agree with that?
 13 **A.** Absolutely.
 14 **Q.** Now, Mr Miller also said in his evidence that this is
 15 something that should have been reported to the Post
 16 Office Group board. Would you agree with that?
 17 **A.** The consequences of not having an accounting system that
 18 produced annual accounts which passed a true and fair
 19 view should have been reported. This was -- the proviso
 20 here was: if these aren't corrected.
 21 Now, the judgment, then, is: do we have plans in
 22 place to correct these errors? I think the judgment at
 23 the time was, remedial actions had been planned, they
 24 were being executed and they were being monitored for
 25 execution and as it turned out, the accounts weren't

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1 qualified because sufficient work was done to overcome
 2 the problems so we didn't have a true and fair view
 3 problem. There wasn't, at the year end and presumably
 4 some time before, a fundamental uncertainty because they
 5 had been corrected.

6 **Q.** Do you recall if you ever raised this letter with John
 7 Roberts or the board?

8 **A.** It wouldn't surprise me that I did. I have no
 9 recollection of it and looking at papers I don't think
 10 I can see evidence of it. Although when we took the
 11 matter to the board, we did report that there were --
 12 whether we used the word fundamental I'm not sure, you
 13 will probably correct me -- there were issues of data
 14 integrity and completeness of records still to be
 15 resolved and we kept the board informed of that.

16 **Q.** Just so I am clear, is your evidence you can't remember
 17 whether or not you raised this with John Roberts?

18 **A.** I can't remember that particular action of mine. It
 19 would be the sort of thing that I would have done with
 20 him but I can't remember. We had a very open
 21 relationship, we met formally, we ran through everything
 22 and matters of this -- of this nature would get onto my
 23 agenda with him but I can't remember if we did and one
 24 of the problems is, you've got hold of lots of records
 25 but none of the records of any of my meetings have been

1 says:

2 "Work on EPOSS was continuing and Pathway had
 3 indicated that whilst it could provide a system which
 4 met the contract, its lack of robustness could generate
 5 high level of errors within POCL. This was being
 6 investigated although it was difficult to quantify how
 7 the system would work until after it had been installed
 8 and was operational."

9 **A.** Yes.

10 **Q.** At that point, what did you understand of the lack of
 11 robustness that was referred to?

12 **A.** This is the Electronic Point of Sale System, isn't it?

13 **Q.** Yes.

14 **A.** To be honest, I recall none of the detail. I don't know
 15 what was cranky about it. Sorry.

16 **Q.** If we could then turn to a second document in
 17 November 1998. It is POL00028672.

18 This is a letter from David Miller to yourself and
 19 other members at the Post Office on 16 November 1998.
 20 Do you recall receiving this letter?

21 **A.** I don't.

22 **Q.** If we could look --

23 **A.** That's my writing in the top. That "In Strictest
 24 Confidence" looks to be my writing.

25 **Q.** So it is addressed to you and it looks like it has your

1 preserved or made available to you. It is a shame but
 2 I can't say yay or nay.

3 **Q.** I am going to jump back then. You have already referred
 4 to the MaPEC meeting, where the Tom, Dick and Harry
 5 proposals were discussed. I don't need to take you to
 6 that document and you have referred to the fact that
 7 shortly thereafter you signed heads of agreement between
 8 Pathway and the Benefits Agency.

9 **A.** Yes.

10 **Q.** I want to look at a few documents in May 1998, if I may.
 11 Starting with POL00069096. If we could go to the second
 12 page please. This was a meeting of the Counter
 13 Automation Steering Group on 27 March 1998 which you
 14 attended?

15 **A.** Yes.

16 **Q.** Do you remember the purpose of this group?

17 **A.** It was a corporate wide group. Because of the
 18 importance of counter automation, not to Counters but to
 19 the corporation, it was agreed that John Roberts as MD,
 20 supported by the group finance director and group
 21 strategy director, would have regular meetings
 22 monitoring progress. So they could relate that back to
 23 the non-executives on the board.

24 **Q.** Please could we turn to page 3 and look at paragraph 4.
 25 This concerns a report provided by David Miller and it

1 writing on it, so you would have received it at the
 2 time?

3 **A.** Yes.

4 **Q.** The second paragraph says:

5 "We are due to start the Model Office Test proper
 6 and the final pass of End to End on 14 December 1998.
 7 My present assessment is that there are some significant
 8 problems with the way Horizon passes information through
 9 to TIP [Transaction Information Processing]. These
 10 relate to the provision of balanced outlet cash accounts
 11 and the processing of the ensuing information via TIP."

12 Transaction Information Processing, that was a Post
 13 Office Counters system to collect transaction records
 14 for all transactions at its branches; is that correct?

15 **A.** Yes, from memory, it was one of the big central systems
 16 in Chesterfield and, basically, everything was
 17 aggregated by it. Various tests were done on the
 18 quality of the information. Error reports were thrown
 19 out and then the information, when finally reconciled
 20 went, into the books of account.

21 **Q.** But for Horizon and the EPOSS system to work, it was
 22 fundamental that it should be able to pass information
 23 to the TIP accurately; is that fair?

24 **A.** I think it sounds fair because, in the olden days before
 25 Horizon, big foolscap sized paper returns were sent from

1 every suboffice, together with all the supporting
 2 information, and that was processed in Chesterfield.
 3 The cash accounts were data captured in Chesterfield and
 4 a lot of testing routines were done then and a large
 5 number of errors were thrown out.

6 And then we had a team of people who took all the
 7 weekly errors and chased them down until there were
 8 really none left and that could take weeks after
 9 an accounting period ended. So TIP was part of that
 10 process.

11 **Q.** The purpose of Horizon, or one of its purposes, was to
 12 partially automate that process?

13 **A.** Yes. The old cash accounting system was hugely
 14 cumbersome, very expensive to run, fraught with
 15 difficulties and was very old-fashioned and, basically,
 16 Horizon was meant to relieve everybody of the paperwork
 17 and replace it with a reliable accounting system.

18 **Q.** Can you recall, even in broad terms, what your thoughts
 19 were when you received this information about
 20 Mr Miller's concerns as to Horizon's ability to pass
 21 information via TIP?

22 **A.** I don't remember receiving a letter but, looking at that
 23 letter and putting it into my present mind, I would have
 24 been very concerned and I would have said, "What are you
 25 doing about it?" You know, "What remedial action is

1 **Q.** Is it something you would have expected to have been
 2 briefed on by David Miller?

3 **A.** If it was important, I would expect him to bring it to
 4 my attention. I don't recall whether he did because
 5 I don't remember the report at all. Sorry.

6 **Q.** If you could turn to page 11 of it to see if this may
 7 jog your memory, and paragraph 1.3. The bottom
 8 paragraph says:

9 "We have to date considered only the BPS system.
 10 Further work has recently started to perform a similar
 11 assessment of the approach adopted for other elements of
 12 the system, such as EPOSS. Nevertheless our findings
 13 are, in our view, sufficiently serious to bring into
 14 question the whole of Pathway's design process."

15 Then if we could turn to page 14, please.

16 **A.** Sorry, do you know what the BPS system is?

17 **Q.** Benefit Payment System?

18 **A.** Right, sorry.

19 **Q.** Page 14. If we could go to the last paragraph, please:

20 "Of particular concern [it says] is the EPOSS
 21 system. We are informed that at a relatively early
 22 stage Pathway wanted the Authorities, principally POCL,
 23 to be involved with the design of this element. The
 24 plan was to use the Rapid Application Development or
 25 ('RAD') methodology to design this system. This

1 being planned?" We were an organisation who was into
 2 continuous improvement and when you come across problems
 3 you then try and develop a management process which
 4 actually sits down and says, "This is the problem, this
 5 is the analysis, this is the remedial action, action
 6 that, watch it come right", and that process of
 7 improvement was at the heart of everything we did and so
 8 this was another one of those challenges. That's how
 9 I would have reacted.

10 **Q.** Can I turn to another document, the following month,
 11 December 1998. The reference is POL00038829. If we
 12 could turn up page 5, please. This is a letter from
 13 Hamish Sandison at Bird & Bird to George McCorkell, Paul
 14 Rich and Pat Kelsey on 18 December 1998, it enclosed
 15 a Project Mentors report. Do you recall reading or
 16 receiving this at the time?

17 **A.** I have no memory of anything called a Project Mentors
 18 report, no idea.

19 **Q.** Do you think it is a document you likely would have
 20 seen?

21 **A.** I really don't know. Bird & Bird were the tame lawyers,
 22 really sponsored by the Benefits Agency. George
 23 McCorkell, I knew, he was one of the top techies in BA.
 24 Paul Kelsey (*sic*), yeah, I remember the name. But what
 25 the Project Mentors report was about I have no idea.

1 approach was started, but discontinued after some
 2 months, when the Pathway staff member involved left the
 3 project. The suggestion to use RAD leads us to believe
 4 that more traditional methods have not been used, and
 5 since the RAD experiment was abandoned, we have doubts
 6 whether any proper requirements analysis has been
 7 performed."

8 It goes on to say that:

9 "Our experience of systems where requirements have
 10 not been analysed satisfactorily is that the system
 11 fails to meet the users' needs. An effective acceptance
 12 test will identify many such failings necessitating
 13 considerable rework. The result is a significant
 14 extension of the time and cost required to complete the
 15 system and roll it out. The alternative is to allow
 16 unacceptable processing in the operational environment
 17 with unpredictable and potentially damaging results."

18 Having gone to those particular parts, do you recall
 19 at all being briefed on those issues by David Miller or
 20 anyone else?

21 **A.** I don't but I suppose I agree the sentiments within
 22 there, as a firm of consultants, they would have a way
 23 of working and this RAD process, I wasn't aware of, but
 24 what they are saying, if I say, it is all motherhood and
 25 apple pie. Those are nice generic phrases. If you

1 don't do it properly it won't work.

2 That's what it is really saying and my experience
3 from other computer systems is, unless you actually sit
4 down, the detailed requirements, when code starts being
5 written, you will get it wrong. And so the analysis
6 which they are talking about absolutely needs to have
7 been done and I think under the PFI type arrangements
8 that is what I would have thought would have been
9 professionally done by Pathway. ICL must have had ways
10 of working which took -- this is what we want as the
11 client; this is how we interpret it from a technology
12 point of view; this is the code we have to write and
13 this is what we are going to deliver.

14 That process is very sequential, very logical and
15 needs to be incredibly thorough and what they are saying
16 is, if you pull any part of that out, it ain't gonna
17 work. And I agree the sentiments, I don't know whether
18 or not that was true because I never saw within ICL.

19 **Q.** In broad terms, can you remember in 1998, so whilst the
20 Benefits Agency was still involved, what did you think,
21 what was your view --

22 **A.** I seem to remember that, as a team, we did have real
23 concerns about -- I use the word "professionalism" --
24 yes, the professionalism of the Pathway team to actually
25 get a grip of and deliver what we wanted as part of the

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1 they were telling me that they'd got a handle on what
2 ICL were doing, "There are these things are still
3 outstanding, but we have an improvement plan to deliver
4 them", to me that's what I wanted to hear as a MD: that
5 they knew what the problems were, that there were
6 documented improvement activities and they were
7 confident that those improvement activities would
8 deliver a good result.

9 To me, that in place, I was happy. I then, on
10 a regular basis, would say "How are you getting on with
11 this, how are you getting on with that?" And the
12 regular reporting that would have existed would have
13 given me confidence or lack of confidence that things
14 were being delivered.

15 **Q.** Let's move through the timeline a bit on that point.
16 Obviously, throughout this time there are a number of
17 negotiations concerning the future of the project and
18 the dealings with the Benefits Agency, which we don't
19 need to go to it but, in paragraphs 30 and 31 of your
20 witness statement, you reflect that you were involved
21 with meetings with ministers and strategic discussions
22 on the continuation of the project itself.

23 This was eventually resolved such that the benefit
24 card system was scrapped and on 24 May Post Office
25 Counters and ICL Pathway agreed to enter or try to enter

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1 set up.

2 Now, one of our early difficulties, I seem to
3 remember, was that the PFI sort of put the boundary
4 between the organisations too far near the user and not
5 near enough the supplier because they were being paid by
6 results. In theory, you transfer a lot of the risk to
7 them and they get rewarded if they produce a good
8 product.

9 Because of that, us as sponsors really aren't able
10 to interfere a lot but I remember our technical people
11 and our project team being worried about the quality of
12 work being done by ICL. Now, that's a very nebulous
13 memory and I can't think of specifics and I don't
14 remember seeing this report but I agree with its
15 sentiments.

16 **Q.** If you can't remember just say, 1998, around this time,
17 in your personal view, did you think that Pathway could
18 deliver the EPOSS programme which Post Office Counters
19 required?

20 **A.** The honest answer is I don't remember the EPOS system.
21 It is a blur to me, so I apologise for that. We set up
22 under Dave Miller a group of -- I regarded them as very
23 bright energetic motivated people who were trying to get
24 to grips with all our requirements and proving to us
25 that what was being delivered was of top quality. If

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1 into a future codified agreement to deliver what is now
2 known as the Horizon system; do you agree with that?

3 **A.** Yes, I do. It was one of my most fraught periods in my
4 management career.

5 **Q.** From 24 May to the end of July, there was a period when
6 the parties had to try to seek to agree terms for that
7 codified agreement, correct?

8 **A.** Yes.

9 **Q.** I then want to look at June 1999. I want to turn to
10 a meeting of the NFSP executive council. The reference
11 is NFSP00000191.

12 This was a presentation on 11 June, which your name
13 is on it.

14 **A.** Yes.

15 **Q.** Can we turn to page 12, please. This sets out what's
16 described as the new vision involving Post Office
17 Counters and focused on ambitions with banking,
18 Government Gateway and mail and communications.

19 Whilst the Benefits Agency had withdrawn, it is
20 right that an automated platform, like Horizon, was
21 still essential to realise some of these commercial
22 ambitions; is that correct?

23 **A.** Yes, and the background to this was, in parallel with
24 all the intense work on Horizon, it was clear that the
25 government wanted -- and the board wanted confidence

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1 that, strategically, we knew where we were going, and we
 2 set up a parallel project with Horizon to develop a new
 3 strategic direction for Counters and to make it
 4 convincing for the board and for government, as
 5 a shareholder.

6 We employed the assistance of McKinseys, who were
 7 an incredible bunch of people, and they really did help
 8 us clarify the opportunities of an automated network.
 9 It was a pretty unique network of Post Offices in every
 10 community in the country and they went through and made
 11 us identify all of our strengths, how those strengths
 12 played in the marketplaces and we came up with
 13 a proposal that our future relied on our ability to
 14 provide banking services.

15 Not to be a bank but to be the front end of many
 16 banks because we already handled a third of the cash
 17 flow of the UK, billions of pounds, we were good at
 18 that, we would have a Horizon system which would be
 19 comparable to what they had in bank branches, and so, as
 20 banks clearly wanted to get out of communities, to cut
 21 their overheads, we could replace that banking role in
 22 providing banking services, access to bank accounts, and
 23 that's what happened. We delivered that strategy.

24 Government Gateway was more tentative because it was
 25 trying to pin many cats to many walls. We believed

1 A. Yes.

2 Q. It says:

3 "Mr Butlin referred to the serious problems that the
 4 South West was having with the software, especially with
 5 the balance, and asked Mr Miller whether any changes
 6 were to be made in that respect. An assurance was
 7 sought by the Committee that the balance would become
 8 more user friendly, more logical and easier for
 9 subpostmasters to use. Would it be possible for
 10 subpostmasters to have more input into the way the
 11 balance was done."

12 It goes on to describe similar problems in the
 13 northeast. Then Mr Miller responds acknowledging:

14 "... that there was a problem and said that there
 15 would be a software change to improve the situation. If
 16 there were serious problems that could not be overcome
 17 in the timescale, the rollout would be delayed."

18 A. Yes.

19 Q. Do you recall this meeting?

20 A. Vaguely yes because we tried to keep close to the
 21 subpostmasters.

22 Q. The concerns raised there by Mr Miller and the
 23 subpostmasters, do you consider those to be significant?

24 A. Well, they would have been because of the experiences of
 25 the subpostmasters involved in the early days of

1 because --

2 Q. Mr Sweetman, sorry to cut over you but, just leaving
 3 that there for the moment on the future of the
 4 Government Gateway. Can I just turn you to the actual
 5 meeting itself.

6 A. Sorry, yes. I was going off on a tangent, sorry.

7 Q. No need to apologise. Could I please bring up
 8 NFSP00000539. Now this report provides the minutes of
 9 this meeting, 11 June 1999. At page 3 there is
 10 an attendance list. You are not on this but as we will
 11 see shortly you are noted to have joined it and that
 12 attendance list includes the general secretary Mr Baker
 13 and also Mr Peberdy?

14 A. I knew Colin Baker very well. Mr Peberdy, I do not see
 15 the name on there.

16 Q. On the right column, three lines up. You remember
 17 Mr Peberdy?

18 A. Yes, I actually visited John Peberdy's office,
 19 I remember.

20 Q. Could we turn then to page 10 of this document. We have
 21 Mr Miller, who is David Miller, provided a brief on how
 22 the rollout was going. Then a Mr Butlin states --
 23 stopping there, Mr Miller gave evidence that Mr Butlin
 24 was a subpostmaster and a leading person for the NFSP in
 25 the southwest, does that sound right?

1 trial -- we were developing and improving the
 2 installation process and they were clearly having
 3 difficulties and it was our responsibility to pick up
 4 all that input, take it away and say "how do we overcome
 5 these problems" and coming up with solutions. It is
 6 this continuous improvement process that I said earlier.
 7 We would have taken that very seriously.

8 Q. The fact that Mr Miller is recorded to say here "there
 9 would be a software change", at this point did you
 10 understand this to be a system problem or a user
 11 problem?

12 A. Software -- there are many words which could fit in
 13 there. You could say a system change, a software
 14 change, a process change, but they have chosen to use
 15 "software". I don't know what language Mr Miller would
 16 have used but if you take it as a whole, that things
 17 would improve because we have taken the input and we
 18 have improved things. It could be a system, it could be
 19 software, it could be a number of things. Again it
 20 could well be training.

21 Q. At this point, do you recall if you knew whether there
 22 were software problems associated with Horizon and
 23 balancing?

24 A. Yes. I think we were aware of it because of, you know,
 25 everything from screen freezes through to information

1 not getting through to TIP. We knew there were some
 2 problems.
 3 **Q.** Could we turn to page 11 please and the bottom of the
 4 page in particular. You were asked about what happens
 5 if there couldn't be an agreement. You go on to state:
 6 "POCL had agreed with Government that if this
 7 breakdown was not the fault of Post Office Counters,
 8 Government would make money available to them. If it
 9 was decided it was Post Office Counters' fault then they
 10 would have to find the money themselves. There was,
 11 therefore, a great deal of pressure on Mr Sweetman not
 12 to break down for whim or convenience, but only if he
 13 believed it not be viable".
 14 Does that fairly reflect your view at the time?
 15 **A.** The honest answer to that question is: I don't know but
 16 it looks reasonable. I think the final sentence there,
 17 where it says "The Board had decided that if the deal
 18 was not right or the best achievable, or was not in the
 19 best interest", then we would not move on.
 20 **Q.** Could you expand on what, at this point, you thought
 21 "not viable" meant? What would the projects have to
 22 look like for you not to go ahead with it?
 23 **A.** If it didn't work, if it didn't deliver the service
 24 improvements, the cost improvements, didn't create the
 25 platform for our strategic ambitions. All those things

1 "Mr Peberdy thanked the Council for their
 2 information."
 3 The last paragraph:
 4 "Referring to the Working Party, which is being set
 5 up to reorganise automation as a result of the
 6 withdrawal of the Benefits Agency payments, Mr Peberdy
 7 confirmed that the group is empowered to call in whoever
 8 they want to gather information to aid their decision on
 9 the way forward. There are three meetings before the
 10 end of July and the meeting scheduled for tomorrow may
 11 well be a prime opportunity to advise them in depth
 12 about the shortcomings of the system."
 13 If you could go to the bottom of that page, now,
 14 please. There was a brief report given on this meeting
 15 by Mr Peberdy and you see at the bottom, he records
 16 that:
 17 "Stuart Sweetman had attended the meeting."
 18 Do you recall this meeting of the Horizon working
 19 party?
 20 **A.** I don't recall this specific meeting, no.
 21 **Q.** Over the page, if I may, and down slightly please,
 22 midway down the paragraph, in the middle, it says --
 23 this refers to various points on the scrapping but it
 24 says:
 25 "Despite this, Ian McCartney, Minister for Trade &

1 would have been taken into account when we were
 2 assessing whether we wanted to continue with it.
 3 **Q.** Can I move on to another meeting please, again of the
 4 NFSP. The reference is NFSP00000471, and page 23,
 5 please. If you could go down to where it says:
 6 "There was a general discussion."
 7 I should say, you weren't at this meeting, but for
 8 context what's being discussed here is, it says:
 9 "There was [a] general discussion on the severe
 10 difficulties being experienced by subpostmasters who are
 11 already running an automated system."
 12 Then it refers to seven sheets of comments from the
 13 north east had been passed to Dave Miller:
 14 "The difficulties and trauma being experienced by
 15 some subpostmasters were giving rise to concerns for
 16 their health and emotional well being. It was felt by
 17 some that a tragedy was not far away if something was
 18 not altered soon."
 19 Please can we go over the next page to the fourth
 20 paragraph. It says:
 21 "The general secretary assured the meeting that
 22 Mr David Miller had been informed of the difficulties in
 23 no uncertain terms."
 24 Then over the page, at page 25, if you could go down
 25 to where it says Mr Peberdy. Thank you:

1 Industry was emphatic and rewriting the rollout
 2 programme would not be contemplated and Dave Miller
 3 confirmed that the intention of POCL/ICL was to adhere
 4 to the 2001 commitment. Automation is expected to take
 5 place within the timescale agreed and Mr McCartney was
 6 emphatic that he would not accept slippage. The Post
 7 Office delegates were told 'you will make it work'.
 8 Does that ring any bells? Do you recollect that
 9 message at this meeting?
 10 **A.** I mustn't be disrespectful to ministers. Ministers say
 11 this sort of thing because that's their role. They are
 12 running the country, they are running a broad agenda of
 13 activities and Ian McCartney, who was quite a hard-nosed
 14 individual from memory, would have been quite clear.
 15 You know, whether he would have thumped the table and
 16 said "You will deliver", I'm not sure. But it was
 17 clear, he was our corporate shareholder and normally
 18 when shareholders tell boards of directors and managers
 19 to do things, you go away and say "Hey, this is
 20 serious".
 21 I would say, from his point of view, that was
 22 a totally reasonable thing to say because the government
 23 had gone through trauma in trying to get to
 24 a decision -- and we had all been watching this -- and
 25 he had then been landed with part of the solution within

1 the DTI. So Ian McCartney would have said "Oh, Christ,
2 it's all landed on my lap, I'm going to make sure
3 everyone knows in the Post Office that this has got to
4 work", and that's what he did. It is classic management
5 devolution.

6 I interpret now, looking back on it. At the time
7 I don't remember any of these individual meetings. I'm
8 just reading into these words.

9 **Q.** The next paragraph says that:

10 "The subject of systems faults were raised and the
11 NFSP were given assurances that there would be software
12 improvements to cure the present difficulties."

13 I'm going to stay with this meeting but I will bring
14 up a comparison document. It may be an appropriate time
15 at this point to pause.

16 **A.** Okay.

17 **SIR WYN WILLIAMS:** Just a second before you do. It is
18 only -- probably a typo but it caught my eye. In that
19 page that's on the screen, as I understand it, this
20 document actually dates from June 1999. But there is
21 reference to a 2001 commitment. Is that just a typo or
22 is there something I should know about a commitment
23 given?

24 **A.** I think what that might mean was, as part of the replan
25 with the exit of Benefits Agency and us taking it all

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1 **Q.** We were looking at NFSP00000471. If I could keep that
2 on the screen and also bring up NFSP00000203 and, in the
3 203 document, if I could turn to page 2 and, for your
4 memory, we are looking at the meeting of the Horizon
5 Working Group on 22 June 1999. As we said, you were
6 there in attendance marked as "Present"?

7 **A.** Yes.

8 **Q.** On the 203 document, if we could turn to page 3, please.
9 What you will see is, at the end, this is a report by
10 Mena Rego and at (c), she says:

11 "rollout; there were reservations about the ability
12 of both sides to achieve the rollout plan, and this was
13 being revised.

14 "Mr Baker said that it was extremely important for
15 rollout to be absolutely right; with so many planned per
16 week (300) there would be a risk of collapse, otherwise.

17 "Mr McCartney said that the rollout issue was
18 crucial; he was emphatically not prepared to accept
19 getting away from the commitment to 2001. Slippage
20 would made the wider discussions of government usage of
21 the network impossible. If there were problems with
22 software, training etc then these should have been
23 flagged up earlier, and must now be resolved in a way
24 that enabled the 2001 timetable to be recovered."

25 That is taken from the DTI minute. So there is two

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1 on, there was a broad timetable to say all this -- the
2 rollout of Horizon would be finished by 2001.

3 **SIR WYN WILLIAMS:** I'm with you, sorry.

4 **A.** 2001 was the completion of the programme.

5 **SIR WYN WILLIAMS:** I follow. Thanks very much.

6 Yes, lets have our break. 10 minutes, Mr Stevens?

7 **MR STEVENS:** Yes, thank you, sir.

8 **SIR WYN WILLIAMS:** Okay fine.

9 (3.07 pm)

(A short break)

11 (3.17 pm)

12 **MR STEVENS:** Good afternoon, sir, can you see and hear me?

13 **SIR WYN WILLIAMS:** Yes, I can, Mr Stevens. Is it correct
14 that I disappeared from the screen for some time during
15 the last session?

16 **MR STEVENS:** I think so, sir, yes.

17 **SIR WYN WILLIAMS:** Obviously, I was actually listening to
18 everything and I wasn't aware of it at the time but
19 could you alert me if that happens, simply so that we
20 can try and fix it as soon as possible?

21 **MR STEVENS:** Of course, sir, yes.

22 **SIR WYN WILLIAMS:** Thank you.

23 **MR STEVENS:** Mr Sweetman, I should check can you see and
24 hear me?

25 **A.** Yes, I can.

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1 points that arise from this. The first is, as I told
2 you before the break, in the NFSP report, it says that
3 the subject of system faults is raised and the NFSP were
4 given assurance that there would be software
5 improvements to cure present difficulties.

6 Can you recall if someone from the NFSP, either
7 Mr Baker or Mr Peberdy, advised the Working Group of
8 this at this meeting?

9 **A.** I don't recall the details of the meeting. I can only
10 read the minutes and assume that they are a true record
11 of what was said. It does not surprise me because Colin
12 Baker and John Peberdy were not slow in coming forward.
13 They would have put their pitch in on behalf of their
14 members.

15 **Q.** In any event, the issues which we -- before the break --
16 were looking at and what they were discussing, just the
17 day before this meeting, you were already aware of those
18 sorts of issues having attended the meeting on 11 June
19 with the NFSP; is that right?

20 **A.** Yes. They, quite rightly and we encouraged them, got
21 feedback from those people who had experienced rollout.
22 Getting that direct feedback was important so we could
23 improve the next round of rollout. And the issues that
24 they had with the system within their office, whether it
25 is the physical system, the software or how their staff

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1 were coping with it and what all their difficulties
2 were, all those had to be documented by the team because
3 each of those were problems which had to be solved and
4 if we were going to go through the whole network we
5 would have to solve them, otherwise we would have
6 an uncontrolled system.

7 So these early -- I hate to use the word "guinea
8 pigs", but these early implementers were crucial so we
9 learned what it was like to put Horizon into a live
10 office, with real people in real communities. So it
11 would have been an important source of evidence.

12 **Q.** So, in short, you were aware of those problems?

13 **A.** Yes.

14 **Q.** The second point on this is what Mr McCartney says. He
15 says the point that software and training problems
16 needed to be resolved within the 2001 timetable. It is
17 recorded that he said that "If there were problems with
18 software [and training] then these should have been
19 flagged up earlier". Now, do you think that's a fair
20 point or do you recall him making it?

21 **A.** I do not recall him making it. It is a fair point and
22 I don't know what officials would have told him.

23 **Q.** If we could remove NFSP203, the one on the left, and
24 keep NFSP00000471 on the screen and can I turn to
25 page 28, please. The paragraph at the bottom there

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1 issues at the front end with the rollout and they needed
2 to be addressed and they needed to be overcome. You can
3 see the sort of materiality we are talking about there,
4 the size and numbers involved, and that made it very
5 serious.

6 **Q.** But at that point, the problems that were being reported
7 from the subpostmasters, they weren't sufficient to stop
8 the project and terminate it there and then?

9 **A.** I think -- I have explained earlier, when you rollout
10 and test the rollout --

11 **Q.** Sorry, Mr Sweetman, I have just noticed we can't see the
12 Chair. My apologies.

13 **A.** I can see the Chair. I can see him smiling, yes.

14 **SIR WYN WILLIAMS:** Yes, I am chuckling at the fact that
15 Mr Sweetman and I can see each other, I can see the
16 document on the screen, I can't actually see you,
17 Mr Stevens, and you can't see me.

18 **MR STEVENS:** No. I'm being told that you are being shown --

19 **MR WHITTAM:** I hesitate to interrupt, but the Chair is on
20 the far screen on this side of the room.

21 **MR STEVENS:** So you are in the room, I can't see you unless
22 I turn my back, we can all see Mr Sweetman and I think
23 someone is moving the TV now. Are you content to
24 proceed on that basis?

25 **SIR WYN WILLIAMS:** Yes, I'm fine and I can see and hear

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1 states, I will read it out:

2 "Roll would proceed as planned starting
3 23/25th August, reaching 300 per week by January 2000.
4 There were some very serious issues still to confront,
5 including training and systems difficulties which must
6 be ironed out, but there is no question of postponement
7 or delay which would cost approximately [8 million] per
8 week."

9 Could we go to the next paragraph please:

10 "So far as termination of the automation project was
11 concerned, the Post Office would not consider this
12 an option. They could only exit the agreement if there
13 are material issues which render the project totally
14 impractical. If POCL pull out it will cost
15 [150 million] and the Benefits Agency will start ACT
16 anyway. Unless something very, very serious occurs the
17 agreement will be signed ..."

18 Again, is that a fair recollection or fair recording
19 of your views at the time?

20 **A.** They look reasonable. I don't recall all the detail but
21 certainly everyone was playing hard ball with each
22 other. The government were playing hard ball with us
23 because we had extracted quite a good deal from them,
24 although it cost us millions. ICL had been put on the
25 line to deliver and it was very serious. There were

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1 everything. I just wouldn't like anybody to think
2 I wasn't present, so to speak, that's all.

3 **MR STEVENS:** I'm grateful, sir.

4 **A.** Where were we?

5 **Q.** Sorry, Mr Sweetman, I interrupted you. What I had asked
6 was or said was that the problems experienced by
7 subpostmasters at that stage, which we covered, that
8 wasn't seen as sufficient to stop the project with
9 ICL Pathway?

10 **A.** I think you have got to understand that the nature of
11 project development that I have alluded to before. You
12 identify a problem -- a series of problems. You analyse
13 them. You come up with solutions. You develop a plan
14 to overcome them and then you action that plan and you
15 see the improvement happening.

16 So what we had here were a series of problems. From
17 my point of view, the important thing was that the
18 problems had been analysed, analysis to be done on
19 cause. Remedial action had been planned. That remedial
20 action seemed to fit in with the overall timescale and
21 did I have confidence in the people who were doing
22 remedial action?

23 Now, that is a management process and, for me,
24 knowing that the problems have been identified, plans
25 were in place to improve them, that was important for

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1 me.

2 If I hadn't seen that, then it would have
3 potentially been at the board if I didn't have
4 confidence that that would be corrected. And I think
5 there were delays in rollout as we waited for more
6 improvements to be made. But, ultimately, those
7 improvements were made and we achieved national rollout
8 because that improvement process was in place and worked
9 by the team who were working incredibly hard to get it
10 right.

11 **Q.** One thing I want to ask at this stage, I heard what you
12 say regarding confidence in remedial measures,
13 et cetera. It says here, in the minutes, that:

14 "They could only exit the agreement if there are
15 material issues that render the project totally
16 impractical."

17 **A.** That is an incredibly high bar. "Totally impractical"
18 means Pathway will run away with the code. That is
19 a very, very high bar and it is almost unlikely ever to
20 be achieved.

21 So it is almost a silly thing to put down in writing
22 to be honest. "Material issues" would mean that you
23 were going to install a less than perfect system, fine,
24 but again what is "material"? If you are talking
25 materiality as an accountant, I always looked at that,

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1 been -- because they used this traffic light system of
2 red, green, amber type of thing on severity. If there
3 was a red problem -- assessed as a red problem, that was
4 significant and it absolutely had to be overcome and it
5 needed to have remedial action. Until it turned into
6 something, "we are coping with this", and errors in cash
7 accounts down and subpostmasters, we had national
8 systems in Chesterfield, error correction processes,
9 which, in my mind, were set up there, under the old
10 system and the new system, to pick up these errors and
11 correct them.

12 Sometimes it took weeks of investigation to identify
13 the impact of that and to put corrections into the
14 system. And I was comforted that we had those
15 correction processes and that we would not have a books
16 of account true and fair view problem.

17 The extent to which errors went uncorrected, which
18 were not material to the national accounts but were
19 material to a subpostmaster, I can imagine that being
20 an issue.

21 **Q.** That issue, determining what is and isn't material from
22 your perspective, was that a matter that you discussed
23 with the board or with John Roberts?

24 **A.** I don't recall but it is the sort of thing we would have
25 talked about because I know, when we reported up to the

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1 when producing annual accounts for the Post Office, what
2 size of error would there need to be for the accounts of
3 the Post Office to be misstated? That's what
4 an accountant thinks of materiality. Now that is
5 probably measured at that time, "Is there a £10 million
6 error"? If there is, that might be a problem.

7 If you are a subpostmaster, if you have got
8 a £500 problem, that's material. Because I'm a small
9 businessman in a rural Post Office. So I was looking at
10 the -- one end of the telescope, which is the big
11 picture, about materiality and size of things
12 threatening the project, whereas unfortunately some of
13 the subpostmasters that I have learnt about were at the
14 other end where their materiality was totally different
15 to the decisions that we were making in headquarters.
16 And there is a separation there between parties.

17 And my mind was on the big picture. Unfortunately
18 the subpostmasters -- who were recording losses, or the
19 system was recording losses -- those were material items
20 for them, they were at the other end of the telescope.
21 I was looking at these big picture items.

22 **Q.** Is what you are saying, I'm not trying to put words in
23 your mouth, but essentially from your perspective, there
24 was a level of materiality --

25 **A.** Yes. I think, at the time, my assessment would have

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1 board, they expressed concerns about technical issues
2 that were still outstanding.

3 When we went back to, was this project fit for
4 purpose, I know David Miller said -- he is quoted as
5 saying it was robust but the board, in its detailed
6 discussions, expressed concern over the outstanding
7 technical issues, which is what the board should do and
8 the nonexecutives on the board would have understood
9 that and then they remitted that to John Roberts and the
10 Chairman to manage and monitor?

11 **Q.** Let's turn to the board and can I ask, please, to bring
12 up POL00028491. This is a report titled "Implication on
13 the Post Office of the 24 May 1999 Horizon Agreement"
14 which had been provided to the Post Office board for its
15 meeting on 20 July 1999. Now the front page appears to
16 be an executive summary. You are noted at the bottom as
17 sponsor with author, Tim Brown.

18 **A.** Tim was quite a senior finance man.

19 **Q.** Unless you would like to see it, we don't need to turn
20 there, but at the end of the substantive report your
21 name is on the bottom of the paper.

22 **A.** Yes.

23 **Q.** Would you have been responsible for its contents?

24 **A.** Yes, because I -- of the management process involved.

25 Tim, in bringing together all the facts, summarising it,

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1 he would have brought the draft to me, talked me through
2 it, I would have assessed it for completeness, accuracy,
3 whether I had the confidence in it for it to go forward.
4 So yes, I would have had responsibility for it.

5 **Q.** On page 2, heading 2 describes the purpose of the paper.
6 It says:

7 "This paper outlines the impact of the new contract
8 and seeks Board approval to the signing of the contract
9 with ICL."

10 It is fair to say this was a significant paper for
11 the board to consider when determining whether or not to
12 go forward with the contract?

13 **A.** Yes, it would have been.

14 **Q.** Can we look at the bottom of the page please. It says:

15 "The key elements of the new deal are:

16 "Functionality consists of Electronic Point of Sale,
17 automated payments, local feeder systems and the Order
18 Book Control System ..."

19 Now, this report doesn't refer to problems such as
20 balancing which had been experienced by subpostmasters.
21 Why was that?

22 **A.** The honest answer is I don't know. The purpose of this
23 was principally financial and impact on the business --
24 this was after we had done the deal, where basically we
25 had to write off £480 million of our reserves and this

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1 software, et cetera.

2 So I would have had to have been satisfied that all
3 the activities which were going on will overcome the
4 problems which had been identified, that the reds had
5 turned into ambers and the ambers had turned into greens
6 and that activity going on to make sure those errors
7 would have been overcome, and that's what I would have
8 been satisfied in and that's why, probably, it didn't
9 feature in here because everything was in place to
10 deliver and overcome the technical problems.

11 **Q.** How did you satisfy yourself of that?

12 **A.** I think you have seen other reports. I certainly --
13 I can't quote them, which ones they are -- but within
14 the programme, we adopted, I believe, the best programme
15 management processes where there were reports, nothing
16 was allowed to drop through the cracks until it had been
17 resolved, and so there were pages and pages and pages of
18 activity reports, broadcast timescales, et cetera.

19 And I would have reviewed those with Dave Miller.
20 Dave Miller would have brought probably high level
21 versions of those on a few pages papers to me, and we
22 would have gone through them and I would have understood
23 them, although they would have got more detailed ones
24 because we probably had three or four levels of
25 management and, appropriate to each level of management,

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1 was taking it forward to the next stage. It wouldn't
2 have been a belt and braces report and I think it is
3 principally finance and strategic.

4 **MR STEVENS:** Sorry, if we can stop there, we appear to have
5 lost the Chair, again.

6 Sir, can you see and hear us?

7 **SIR WYN WILLIAMS:** I can, yes.

8 **MR STEVENS:** I'm grateful, thank you, sir.

9 At page 5, under heading 6, it says that:

10 "The Board is invited to note:
11 "the impacts of continuing or terminating Horizon;
12 "that continuing, while bad, is better than
13 termination."

14 The paper went on to recommend signing. Was it not
15 important for the board to know about the programme
16 issues we have been discussing that had been raised with
17 Horizon to make an informed decision on whether or not
18 to approve entry into the contract?

19 **A.** I suppose, in retrospect, it would have been helpful.
20 But, again, looking at this document, the board -- the
21 board through to John Roberts, through to me, me through
22 to the programme, they -- if we had said "We are not in
23 control", then they would not have allowed it to go to
24 board. So, in my view, we had to have a project which
25 had in place everything to deliver the required

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1 issues would have been resolved.

2 And I would have had the -- this is me quoting in
3 theory not from memory -- I would have had the two-page
4 version, Dave would have had the five-page version,
5 other people would have had the ten-page version, all of
6 which were summarised up fairly by the process, and we
7 got the appropriate level of information that we could
8 act on. And what I would have seen would have been
9 sufficient to persuade me that it was under control and,
10 if it wasn't under control, I would have had a personal
11 obligation to report it to the board.

12 Clearly, what was happening hadn't managed to make
13 that threshold where I felt an obligation to report it.
14 Again, there is a lot of hindsight in this but
15 I remember the way I worked and that's how I would have
16 worked and that's how Dave Miller would have worked.

17 **Q.** Could we turn up the board meeting that this report was
18 presented to. It is POL00000352. These are minutes of
19 20 July. Both you and Mr Miller are in attendance.

20 **A.** Yes.

21 **Q.** It was to discuss and determine whether to sign the
22 codified agreement. Could we turn to page 11, please.
23 (v), it says:

24 "System rollout was scheduled for 23 August ... with
25 acceptance needed by 18 August. There were three

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1 categories of acceptance each with a threshold which
 2 would determine whether or not rollout could proceed:
 3 high, medium and low.
 4 "One incident within the high category, or more than
 5 20 ... within the medium category, would result in the
 6 system not being accepted."
 7 Stopping at that point. What was your understanding
 8 of an Acceptance Incident?
 9 **A.** Something which wasn't right. Something which wasn't
 10 working as per spec.
 11 **Q.** Do you think the members of the board understood what
 12 an Acceptance Incident was?
 13 **A.** There would have been broad understanding because the
 14 board was a mixture of the most senior executives in the
 15 Post Office and non-execs with good commercial
 16 experience and they, in their other business activities,
 17 would have come across this sort of thing before.
 18 I think it was a language everybody felt reasonably
 19 comfortable with.
 20 **Q.** Moving on, (vi), it says that:
 21 "Excluding concerns over training, David Miller
 22 considered the system robust and fit for service."
 23 Do you recall whether David Miller said that?
 24 **A.** I have no recollection. But I have, actually -- it's
 25 the one bit of his evidence that I have seen and I saw
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1 accept that?
 2 **A.** It was probably both. Again, my broader experience of
 3 implementing new systems, yes, you have got the hardware
 4 problems, you have got the software problems, you have
 5 got -- and then you have got the people challenge.
 6 I had learned that, unless you get the training right,
 7 people will not have the confidence in themselves to
 8 operate the system and, therefore, people are very
 9 nervous at handling things new, and training has got to
 10 give them the confidence -- not only the techniques and
 11 the processes, but the confidence that they can do it
 12 and, unless you get that right, you are going to have
 13 problems.
 14 And I think some of the feedback and some of the
 15 analysis of the issues indicated to us that the
 16 subpostmasters hadn't been trained well enough and,
 17 therefore, what we need to do is feedback into the
 18 trainers "You improve your training process", and
 19 I think that's what we want ICL to do, because it was
 20 part of the contract. "Unless you train these people
 21 well, we are going to get problems", and that's what one
 22 of the bits of analysis that was done, came up with the
 23 conclusion, as well as system freezes which has nothing
 24 to do with subpostmasters.
 25 **Q.** I want to stay with this theme but pick up another
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1 he was uncomfortable with having said that. I observe
 2 that.
 3 **Q.** It is not consistent with --
 4 **A.** It is not consistent with the rest of the minutes.
 5 **Q.** It is not consistent with the complaints that you were
 6 hearing from subpostmasters at the NFSP meetings, was
 7 it?
 8 **A.** Those are two different things. They were reporting
 9 what was happening at individual post offices. We were
 10 looking at the overall system and did it overall work?
 11 If you scroll down the minutes, I have actually looked
 12 at this. On the next page (xii), at the board meeting,
 13 we had clearly gone in and described the technical
 14 difficulties which were being explained and "Members
 15 were concerned that a number of technical issues
 16 remained unresolved", and the BA -- there were two
 17 critical issues that needed to be progressed.
 18 Now, we had put up that there were technical
 19 difficulties and, I think, in the meeting we would have
 20 said "And we have remedial plans". That is what I think
 21 happened. I don't recall it happening but I think
 22 that's what we would have said.
 23 **Q.** Mr Roberts, when he gave evidence said that had the
 24 project team considered this more a human nature and
 25 training issue rather than a system issue. Do you
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1 document, if it can be put on the screen at the same
 2 time. It is POL00028479. These are minutes of the
 3 "Counters Executive Committee Meeting", on Thursday,
 4 22 July?
 5 **A.** Yes.
 6 **SIR WYN WILLIAMS:** Could they be enlarged on my screen,
 7 please, they are in a small box at the moment.
 8 **MR STEVENS:** Of course, sir. In fact, if we could just have
 9 the left ones on. So it is the 22 July, so two days
 10 after that board meeting, and paragraph 2.5, this notes
 11 that the board had empowered Neville Bain and John
 12 Roberts to make the final decision on whether to sign
 13 the final decision with ICL Pathway.
 14 Turning to 2.6:
 15 "Stuart Sweetman advised that there were two
 16 remaining areas of concern:
 17 "The level of incidents occurring in trial offices
 18 was still too high for technical acceptance, although
 19 improvements should be confirmed over the next few days
 20 to allow acceptance to take place."
 21 **A.** Yes.
 22 **Q.** That knowledge of the incidents being too high in trial
 23 offices hadn't come to your attention the days following
 24 the board meeting on 20 July, had it?
 25 **A.** Reading that, this is me telling my top team what my
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1 areas of concern were and I think that would have been
 2 in my mind and probably said at the main board meeting.
 3 These were technical issues of concern that were still
 4 being handled, still being managed to elimination.

5 **Q.** Is your evidence that you did say to the board on
 6 20 July, you said that the level of incidents in trial
 7 offices was still too high?

8 **A.** I didn't say that and I don't recall saying it. But
 9 I probably would have said it because it was in my mind,
 10 clearly, when I came back to my team and the board
 11 minutes, I think, did refer to errors still being
 12 managed and this is what I would have referred to and
 13 that's what the main board heard.

14 **Q.** Mr Roberts' evidence that he, at this point, considered
 15 this to be more of a training issue, do you think you
 16 could have done more to set out to the board that there
 17 were still a high level of technical issues with the
 18 system itself?

19 **A.** I think in hindsight, yes. What I don't know -- if John
 20 remembers it just as training, it wasn't solely
 21 training. There were technical issues with the system
 22 and there were training improvements needed. I think it
 23 was the two together, in my mind.

24 **Q.** During these discussions with the board, just so we have
 25 it clear in our minds as to timings, when we discussed

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1 place. And that's what the team were working on and
 2 eventually delivered.

3 **Q.** At this board meeting you were also considering the
 4 codified agreement, and do you remember that the
 5 codified agreement had a clause that required Pathway to
 6 provide data to the Post Office, that would be suitable
 7 for submission as evidence in support of prosecutions?

8 **A.** I don't remember that bit, no.

9 **Q.** Did that form any part of your thinking when you were
 10 considering the level of robustness of the system that
 11 you would be prepared to accept?

12 **A.** No. I would have read the agreements, all of it, before
 13 approving, signing or whatever. If I saw that para --
 14 there would have been paragraphs in that agreement that
 15 were written by lawyers. We had our own in-house
 16 lawyers, about a hundred of them I think, and they would
 17 have helped us draft agreements.

18 We were using Slaughter and May as a renowned firm
 19 of solicitors to help us draft these things.

20 And they would have inserted lots of, if I say,
 21 non-system paragraphs in there because that's what
 22 lawyers do. They paper over all the potential cracks
 23 and that's why you pay them.

24 If I saw that I would have said "that's one of those
 25 paragraphs put in by a lawyer" but I don't remember it.

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1 earlier the material errors and you talked about your
 2 perspective on what's material and the subpostmasters'
 3 perspective to what was -- for acceptance, would you
 4 have considered that at the board meeting on 20 July?

5 **A.** It would have been in my mind, yes.

6 **Q.** Would you have raised with the board or discussed with
 7 the board the level of errors you would be prepared to
 8 accept in the system?

9 **A.** That is very hard to quantify to a main board. I was
 10 using my professional knowledge and experience,
 11 I suppose, were these errors threatening the
 12 viability -- I think, we've used before -- of the
 13 system? Were they fundamental -- I think is another
 14 word which is being used. They were clearly concerning
 15 because they were causing a lot of aggravation within my
 16 business. The postmasters were having a very troubled
 17 implementation and that is not what you want. In the
 18 first few hundred implementations, if that then happens
 19 over the next 18,000, you have got a business out of
 20 control.

21 Personally, I would have wanted to know that, as we
 22 rolled out at 300 offices a week, which I do not think
 23 many systems would ever have contemplated in the UK,
 24 that needed to be much slicker, much more error free,
 25 much better training and that's what I wanted to see in

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1 **Q.** Was it not the case that the Post Office -- is your
 2 evidence, sorry, that you think the clause where Pathway
 3 is to provide evidence for use in prosecutions was put
 4 in by a lawyer rather than be a requirement of the Post
 5 Office itself.

6 **A.** They are one and the same. They could have been our own
 7 lawyers from our solicitor's department or they could
 8 have been Jeff Triggs and his team in Slaughter's. But
 9 that is probably -- I doubt if my project team would
 10 have dreamt that up themselves. It would have been,
 11 "you need one of these in there" because I was aware
 12 that there was -- and dealt with by the regional
 13 managers and retail network managers -- there were
 14 isolated instances where we had legal problems with
 15 subpostmasters. Unfortunately, a very few of them did
 16 steal money in the past -- and that was our history --
 17 and there had to be investigation and prosecutions and
 18 recovery of money. That was before Horizon and that,
 19 I knew, happened within the depths of the business.

20 **Q.** Who was responsible for that?

21 **A.** This is just continuing that process.

22 **Q.** Who was responsible for the prosecutions within the Post
 23 Office?

24 **A.** I think our solicitor departments had, under some
 25 legislation, the powers of prosecution because the

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1 police and the prosecution authorities, if I say, didn't
 2 want to be bothered with us, they were relieved when we
 3 had the in-house capacity to investigate crime, be it on
 4 the mail side or the Counters side and to carry out the
 5 prosecutions. I think we had in-house solicitors who
 6 would have done that. I knew broadly what they did but
 7 I never got involved.

8 **Q.** Just to clarify, did anyone on the board, the Group
 9 board, ask you any questions about prosecutions and the
 10 use of data from Horizon in support of --

11 **A.** I have no recollection of it and I would be amazingly
 12 surprised if they did.

13 **Q.** Why would you be surprised?

14 **A.** Their eyes were on the far horizon -- with a little
 15 "h" -- rather than down in the depths of my business.
 16 So I very, very much doubt -- because there weren't any
 17 lawyers on the main board and they wouldn't have seen
 18 that clause. I would not have brought it to their
 19 attention. So the board would not in any way have
 20 considered it.

21 **Q.** It is a matter where we know that there were
 22 prosecutions pursued in 2001 and so investigations in
 23 2000 using Horizon data. So do you accept that Horizon
 24 was used to support prosecutions --

25 **A.** If you are telling me that, I accept it. I have no

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1 the rollout programme? We said "Hold on, let's get it
 2 right before we move on". I think we slowed down things
 3 or stopped things for a period.

4 **MR STEVENS:** Sir, I can move on to this now. I'm aware --
 5 unfortunately I think we are going to run into tomorrow.
 6 Mr Sweetman has been warned. I'm happy to continue now
 7 or if you prefer, a short break and carry on?

8 **SIR WYN WILLIAMS:** Well, I don't think we should take
 9 a short break. Perhaps we should continue until, say,
 10 4.15 pm and then call a complete halt at that point.
 11 Are you happy with that, Mr Sweetman?

12 **A.** I would prefer to get it done today.

13 **SIR WYN WILLIAMS:** How far away are you from completing your
 14 questions, Mr Stevens?

15 **MR STEVENS:** I have probably got 20 minutes to, well,
 16 half an hour I would say and then we have got questions
 17 from some recognised legal representatives.

18 **SIR WYN WILLIAMS:** Well, anyway, you continue for the moment
 19 and we will see where we get to.

20 **MR STEVENS:** I'm grateful.

21 I want to look in August now and I have already
 22 taken you to a document, the Ernst & Young document that
 23 referred to Acceptance Incident 376.

24 Before considering that in more detail, what I'm
 25 interested to know is, in August and September -- so

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1 knowledge of it. I think, by then I was again one
 2 removed from the detail of running the business.

3 **Q.** Is it right -- I will ask one last time -- that you
 4 simply cannot tell us who, in Post Office, was thinking
 5 about how Horizon data could be used in prosecutions in
 6 1999?

7 **A.** Again, I just reiterate what I have said. When you
 8 hand -- when you have the task of producing
 9 an agreement, you have all the people who are interested
 10 in what it delivers and then you have the lawyers and
 11 the lawyers insert paragraphs and you have to trust
 12 their judgement. Well, normally you do.

13 **Q.** It is right that you subsequently signed the codified
 14 agreement on 28 July 1999; do you remember that?

15 **A.** If there's evidence of that, yes, I would. I don't
 16 recall doing it.

17 **Q.** Following the signing of the agreement there was
 18 continued operational testing, yes?

19 **A.** That would have continued yes. The whole continuous
 20 improvement process would have continued.

21 **Q.** Do you recall being aware of a number of Acceptance
 22 Incidents that Post Office had raised as preventing
 23 acceptance?

24 **A.** I think it got to the stage where there were errors and
 25 that -- I think we didn't -- didn't we put a halt on

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1 before the rollout -- do you recall at all a series of
 2 acceptance workshops to resolve the various incidents
 3 that had been raised as Acceptance Incidents?

4 **A.** I don't recall them but I can understand they would have
 5 happened because that was part of the management process
 6 of having problems, analysing them, resolving them and
 7 actioning them. So I would imagine that those workshops
 8 would have taken place.

9 **Q.** Could we please bring up POL00028465, and over the page,
 10 please. This is from David Miller and it is addressed
 11 to you on 8 September 1999, concerning Horizon
 12 acceptance and review of progress.

13 Do you remember receiving this letter?

14 **A.** I don't remember receiving it but I can see it now.

15 **Q.** If we can move the screen down please. 1.1 is
 16 "Training", it refers to:

17 "Bruce McNiven and Ruth Holleran have done excellent
 18 work squeezing a better training deal out of ICL
 19 Pathway."

20 The second is "system lock-ups and screen freezing
 21 requiring reboots".

22 I think in your evidence earlier you referred to
 23 this. Do you recall that as an issue needing to be
 24 resolved?

25 **A.** Yes, that was part of the feedback from the

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1 subpostmasters, wasn't it? Yes. That was happening and
2 clearly, if the system isn't operating, that would not
3 only affect the subpostmaster, but affect our service to
4 our customers who are queuing up in their branch. So
5 that was a serious issue.

6 **Q.** If I can go to 1.3, it says "Derived cash account not
7 [it should be 'equalling'] electronic cash account":

8 "Ruth Holleran has again done sterling work here and
9 the understanding of the problem and fixes and controls
10 are largely in hand. However the major controls cannot
11 be implemented until Christmas with a patch available
12 from early October.

13 "Ruth see this incident as being downgradable to
14 medium with an agreed rectification plan but there are
15 still too many important loose ends and she has doubts
16 whether this will improve sufficiently for us to accept
17 ... by the end of September."

18 Do you recall this issue?

19 **A.** I don't recall it but I have read it.

20 **Q.** If you can go down a bit further to the summary, please.
21 At this point it says:

22 "Of our six key players (Keith Baines, Ruth
23 Holleran, John Meagher, Bruce McNiven, David Smith, Andy
24 Radka) the first 4 would opt (somewhat reluctantly) for
25 conditional acceptance towards the end of September.

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1 joint workshops with ICL Pathway but as of today there
2 were still 2 high incidents (Data integrity across the
3 TIP interface and system stability around screen
4 freezes) which would, in the Post Office view, make it
5 difficult to accept on 24 September.

6 "The two incidents have rectification plans parts of
7 which will take up until Christmas to complete, eg the
8 data integrity control necessary to satisfactory the
9 auditors won't be ready until early December and we will
10 have to continue our checking until then."

11 We discussed earlier the issue of data integrity
12 going to the heart of the function of Horizon on which
13 you had received advice from Ernst & Young on how it
14 would affect your statutory accounts.

15 When you received this letter, do you recall what
16 you did or would have done or what would you have done
17 to satisfy yourself that the rectification plans were
18 satisfactory?

19 **A.** I don't recall but I can speculate what I would have
20 done, based on the way I react to this sort of memo.

21 I would have sat down with Dave Miller and discussed
22 it with him. Just to sort of tease out a bit of flesh
23 on the bones of this, "What does it really mean? Are we
24 picking up the errors in Chesterfield? Are we
25 correcting the accounts? Are we making adjustments?"

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1 Andy Radka and David Smith would not accept and seek to
2 use the full period until 15 November to force improved
3 performance from ICL Pathway."

4 Do you have any recollection of this debate
5 concerning conditional acceptance?

6 **A.** No, I don't recall the internal debate but those were
7 all people who were immersed in the system and they
8 would have had their own individual views and we
9 welcome -- and we used to welcome that sort of debate
10 within teams -- as a way forward.

11 **Q.** Would you have been involved in the decision?

12 **A.** Not directly, no.

13 **Q.** Your evidence is you would not have been directly
14 involved in the decision whether or not to conditionally
15 accept --

16 **A.** At that level, yes. I would not have been involved in
17 classifying individual things, whether red or green or
18 whatever. But, certainly, Dave Miller would have
19 involved me, so there were no surprises. We had
20 a no-surprises way of working together.

21 **Q.** Could we bring up POL00028462, again, on the second
22 page, please. This is a memo, again, from David Miller
23 to yourself two days later on 10 September. At point 1,
24 it says:

25 "Very considerable progress has been made in the
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1 Because if he couldn't have reassured me that all that
2 was happening and there weren't improvement plans in
3 place, I would have been worried.

4 **Q.** That's all hypothetical.

5 **A.** It is hypothetical. I'm afraid, I don't remember this
6 level of detail now but I'm just saying how I would
7 react to this type of memo. It is just the way
8 I worked.

9 **Q.** Please could we bring up POL00000353. This is another
10 meeting of the Post Office board, which you attended on
11 14 September, and can we turn to page 3. Number (iii)
12 says:

13 "When the board last met in July ... POCL's Horizon
14 Programme Director had been confident that system
15 acceptance would occur as planned on 18 August.
16 Unfortunately, three high priority Acceptance Incidents
17 around training, stability of the system (lockups and
18 screen freezes) and quality of accounting data, remained
19 unresolved and whilst ICL did not accept the
20 categorisation of these incidents, they nevertheless
21 resulted in acceptance being deferred until
22 24 September."

23 Now --

24 **A.** I think that's good evidence that we kept the board
25 informed of the detail. We told the board there were

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1 problems. We told the board what we were doing about
 2 it, that we had deferred acceptance because of the
 3 problems, so the board were fully aware of it. So you
 4 have got an example of their problems, action and then
 5 what we then did about it.

6 **Q.** John Roberts' evidence was that these issues to the
 7 board were considered to be small enough to be handled
 8 and rectified by December; do you accept that?

9 **A.** I accept that because probably John has a better memory
 10 than me. I, probably -- in looking at these things and
 11 looking at the rectification plans, there would have
 12 been an acceptable timetable. Whether that was December
 13 or not I don't know. But, certainly, probably at the
 14 board, we would have been questioned, "Have you got
 15 a grip on this? Are you handling it? Is your programme
 16 of change in place?" And we would have said "Yes",
 17 because that was our belief and our judgement.

18 Here I think we were reporting upwards, washing our
 19 dirty linen in the board. So I'm quite happy with that
 20 note. That's exactly what we would have been doing.

21 **Q.** I have taken you already to the Ernst & Young advice
 22 that they could not make an unqualified opinion.

23 **A.** No, they said "If these things weren't rectified, that
 24 would give us a problem", and they didn't qualify the
 25 accounts. So the problem was overcome.

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1 So it is how you read something, it is different
 2 from where you sit. If you are on the main board, you
 3 are looking at big issues; if you are a subpostmaster
 4 you are looking at your cash. And those are two
 5 different perspectives on the same thing and you can
 6 make two different decisions, as I have explained.

7 **MR STEVENS:** Sir, I'm happy to continue. I note it is
 8 4.15 pm. It is at this point, I would go to a new
 9 document.

10 **SIR WYN WILLIAMS:** Who wants to ask questions, apart from
 11 you, Mr Stevens? In my list either Mr Moloney or
 12 Ms Patrick, I think, is down to ask questions. Is there
 13 anybody else?

14 **MR HENRY:** Sir, I have been permitted one question or one
 15 topic. Edward Henry, sir.

16 **SIR WYN WILLIAMS:** I can hear your voice.

17 **MR HENRY:** Thank you.

18 **SIR WYN WILLIAMS:** And Mr Moloney, Ms Patrick, what about
 19 you?

20 **MR MOLONEY:** Sir, as you will be aware from the Rule 10
 21 submission, there were questions that we proposed that
 22 counsel for the Inquiry said that they would ask. They
 23 have now, as it were, passed them to us and so we
 24 anticipate that we probably would be about 15 to
 25 20 minutes and Ms Patrick will ask the questions.

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1 **Q.** But, at that point, Ernst & Young had said "If the
 2 problems remained, it was unlikely they would be able to
 3 make an unqualified opinion". As I say, John Roberts'
 4 evidence was these issues were presented to the board
 5 and small enough to be handled and rectified in
 6 September. Realistically, do you think the data
 7 integrity issue could be described as a small one?

8 **A.** Small probably isn't the word I would use, because we
 9 had put it as red. There were data integrity problems
 10 and they needed to be fixed and, if we didn't fix them
 11 by the year end, Ernst & Young wouldn't qualify the
 12 accounts. They were fixed, to the extent material to
 13 a true and fair view of the accounts. Whether they were
 14 fixed sufficiently to overcome the problems, if you were
 15 at the other end of the telescope as subpostmaster,
 16 where you had a £500 problem, that £500 problem doesn't
 17 threaten the true and fair view of the Post Office
 18 accounts, but I recognise it is very significant when it
 19 comes to being a subpostmaster.

20 In these discussions, we were primarily looking at
 21 the big picture, the Post Office as a whole. That's not
 22 to say the Horizon programme wasn't looking at the
 23 interest of subpostmasters but, in this sort of
 24 discussion, it was the big picture looking forward with
 25 the materiality of the corporation.

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1 **MR WHITTAM:** Sir, I have raised one matter that's arisen out
 2 of the evidence -- Richard Whittam for Fujitsu --
 3 I would be less than five minutes.

4 **A.** Mr Chairman, I also have something I would like to read,
 5 a final statement, which will take five minutes to read.

6 **SIR WYN WILLIAMS:** All right. At the end of the day, I have
 7 to make a judgement about whether carrying on is fair to
 8 you. I think I understand that you would prefer to
 9 finish but I also have to make a judgement about what's
 10 fair to my levels of concentration.

11 **A.** I have the same trouble sometimes.

12 **SIR WYN WILLIAMS:** I think on balance we had better stop.
 13 It looks as if you will be no longer than about 30 to
 14 45 minutes tomorrow morning, and I will do my best to
 15 keep them to that but I think we will stop now.

16 **A.** Okay.

17 **MR STEVENS:** Thank you, sir.

18 **SIR WYN WILLIAMS:** So 10 o'clock tomorrow morning.

19 **MR STEVENS:** Thank you, sir.

20 Mr Sweetman, just so you know, you are still giving
 21 evidence, so please don't discuss your evidence with
 22 anyone else between now and tomorrow.

23 **A.** Okay. Can I just ask a question?

24 **SIR WYN WILLIAMS:** Yes, please do.

25 **A.** The 12 inches of paper that I have surrounding me that

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1 I have been sent, what ultimately do I do with those?
2 **SIR WYN WILLIAMS:** Don't worry, someone from the Inquiry
3 secretariat or legal team will contact you and you will
4 have a discussion with them and resolve it with them.

5 **A.** Thank you.

6 **SIR WYN WILLIAMS:** That's fine. 10 o'clock tomorrow
7 everybody.

8 **(4.18 pm)**

9 **(The Inquiry adjourned until 10.00 am on Wednesday,**
10 **2 November 2022)**

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12	Questioned by MS HODGE	1
13	Questioned by SIR WYN WILLIAMS	90
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