Witness Name: Ms Mena Rego

Statement No.: WITN0413\_01

**Dated**: 12.09.2022

Exhibits: WITN0413\_01/01-

WITN0413\_01/17

#### POST OFFICE HORIZON IT INQUIRY

#### FIRST WITNESS STATEMENT OF MENA REGO

I, Mena Rego will say as follows:

#### Introduction

- The request for this Witness Statement was accompanied by 83 disparate documents, from a variety of sources, some of which I had never seen before and would not have had access to when I worked on Horizon. I have no personal records relating to that time. It is over 23 years since I worked on Horizon and 20 years since I retired from the Post Office.
- 2. The questions I have been asked to address by the Horizon Inquiry relate to specific periods of time, with no context, other than that which I could deduce from the contents of the documents themselves. I have therefore drawn upon the Chronology of Events at Appendix 3 of the National Audit Office (NAO) Report 'The Cancellation of the Benefits Payment Card project', 18 August 2000, (See WITN0413\_01/01; POL00000805) to provide some structure to my

Statement, which is generally in chronological order. In doing so I have tried to rely ONLY on my own recollection and not be influenced by the findings of the Report. However, there will be references in my statement to events that I would not otherwise have remembered.

- 3. I am unable to answer any of the Inquiry's questions relating specifically to technical issues that affected Horizon at various points in times. Technical matters were not within my remit and are outside my area of competence. I have picked up ONLY on those issues with contractual or commercial implications for POCL, which was my role during this time.
- 4. Not having access to my own personal records of the time, I have had real difficulty remembering what happened after December 1998. It was a fairly hectic time with discussions taking place in many forums, between the parties individually and separately and with Government officials. The documents provided to me do not cover the full range of these activities and do not aid my recall.
- 5. I left Horizon and POCL in Summer 1999, to take up an appointment as Commercial Director in a new Business unit, created following a major reorganisation of the Post Office. I believe this was in July 1999 or very shortly after, but cannot remember the precise date. I recall I was not involved in finalising POCL's contractual arrangements with BA and ICL; or in any activities relating to the final testing and acceptance of Horizon.

I am therefore unable to answer any of the Inquiry's Questions on these areas

or indeed on post-acceptance activities such as: roll out and management of the system; end user engagement and feedback.

# My Professional Background

- I spent my professional career in the Post Office, joining as a graduate entrant
  in 1972 and moving up through the ranks, in a variety of operational and
  commercial roles, before retiring at the end of 2002.
- I gained extensive experience of the Post Office Counters operations in these
  roles, culminating in my appointment as Head of Retail Network on POCL's
  South-East Regional Board (1991-1993) with responsibility for services in 2,000
  post offices.
- 8. Significant roles I have had include: agreeing the commercial arrangements for the sale of National Lottery tickets with Camelot and setting up a national network of lottery terminals in post offices (1994-1996); my role on the Horizon project from (1996-1999); restructuring a Post Office Joint Venture with private sector partners, to deliver licensing services worth £100m to the BBC; negotiating a financial settlement with an IT provider worth £20m (1999-2001); managing the £60m TV licensing operation. based in Bristol, and transferring 1,500 staff employed in that operation, to Capita under TUPE terms (2001-2002). My final project. before retiring in 2002, was working with the Post Office Chairman (Allan Leighton), to develop and launch a Royal Mail employee reward scheme for 180,000 employees, linked to company profitability

(potential value of £40m).

# My involvement in Horizon

- 9. In Autumn 1996, I was appointed Horizon Development Manager, reporting to Paul Rich, the Horizon Development Director (at no time did I replace him as Development Director). By this time, a PFI contract for the delivery of the Benefits Payment Card and automation of post offices had been awarded to ICL Pathway and a joint BA/POCL Programme Delivery Authority (the PDA) was in place to assure, test and accept Pathway's solution on behalf of BA and POCL. I had not been involved in any of these activities.
- 10. My remit was principally to deal with the contractual aspects of the Horizon Programme. As Paul Rich's responsibilities within POCL extended, and he began to take on wider business responsibilities as a member of the Counters Executive Committee, I frequently deputised for him at meetings with the PDA, BA and ICL Pathway and took on additional responsibilities that he delegated to me. I continued to report to him until he left POCL, some months before I did. I believe I then reported to MD/POCL.

#### Horizon (Autumn 1996-Spring 1997)

- 11. My role at this time included:
  - (i) providing a dedicated POCL business interface with the PDA, to ensure POCL's interests in Horizon were represented. It is worth noting that though the PDA was staffed by secondees (staff and consultants)

- nominated by both POCL and BA, it was led by senior DSS staff at this time.
- (ii) picking up and where necessary, addressing POCL-related contractual issues with BA or ICL.
- (iii) providing updates /background briefing on the status of Horizon to senior business leaders in POCL, including Post Office Board members.
- (iv) I was not involved in technical activities such as development or testing, in either the PDA or POCL as this was not in my remit. Though I was copied into Reports and Minutes of meetings where these matters were discussed, my primary focus was on their contractual implications for the timely delivery of Horizon.
- (v) As POCL's key representative, I was frequently the default nominee for actions that the PDA required from the wider business. I cannot readily recall how I dealt with specific action points but I would have liaised with colleagues across the business to make sure they provided the required input or support.
- 12. To enable me to respond effectively to Horizon's needs, I had a small group of managers, from different specialisms within POCL, reporting directly or indirectly to me, on the following areas of their responsibilities:
  - (i) POCL's contracts with ICL Pathway
  - (ii) POCL's contract with BA for the provision of automated services
  - (iii) POCL's Business case for Horizon.

# Programme delay

13. My first encounter with programme delay was early in 1997, when a slippage in timescales for the delivery of a key contractual milestone was identified. There were disputes, principally between BA and Pathway, about whose fault it was. Eventually all three parties agreed to absorb their own costs and produced a revised Master Plan (March 1997).

#### Primary causes of delay

- 14. With the benefit of hindsight, I can see that the primary cause of this early 1997 delay, and subsequent delays, was the fact that all three parties to the contract grossly underestimated the amount of time and effort that development of Pathway's solution would require. As PA Consulting noted in their report (WITN0413\_01/02; POL00028092): "The BA/POCL programme is a large and complex programme of change [...]. In PA's opinion the Programme is world-class in its ambitions...".
- 15. The PFI contractual arrangements for this programme contributed to confusion about the definition of requirements. What is clear is that ICL Pathway did not have a clear understanding of the complexity of BA's or POCL's requirements when they started developing their solution. As a result, there was a serious mismatch of expectations during the development process and ultimately a lot of work was needed to address the deficiencies that became apparent as requirements were clarified and work progressed.

# Consequences of delay in July 1997

- 16. BA/DSS raised their concerns about programme slippage with Government officials and POCL was invited by DSS officials to agree to an independent review of the programme by PA Consulting. ICL Pathway also agreed to this review.
- 17. PA's findings had significant implications for the future of Horizon:
  - (i) PA reported that Pathway's current plans for national roll out by the end of July 1998 would not be achieved and that Horizon was unlikely to be ready for roll out before January 1999. They estimated that roll out would take 1.5 to 2 years to complete.
  - (ii) As chronic slippage was "putting stress on the viability of each organisations' business case", PA recommended that a strategic reevaluation of options for the future of the Programme should be undertaken under DTI and DSS direction;
  - (iii) PA proposed an Action Plan for the parties to implement their recommendations, for each organisation, to strengthen their ability to support the timely delivery of Horizon.

# **Problems facing Horizon between Spring to Autumn 1998**

18. During this period, the PDA, ICL Pathway and BA/DSS continued work on developing, testing and modifying the key software releases due to be tested in the Live Trial and on preparing post offices for participation in it.

- 19. In the background, work was proceeding on implementing PA's recommendations:
  - (i) An Inter-Departmental Working Group to review options for the future of Horizon was commissioned by Ministers. "It was to include a review by an Independent Panel of experts chaired by the Chief Executive of the Treasury Task force on Private Finance." (See WITN0413\_01/01; POL00000805). KPMG were commissioned to support this review. The Working Group began to develop possible scenarios for the future of Horizon and assemble supporting information. A final Ministerial decision on Horizon's fate was over a year in coming, which meant that the programme was proceeding in an atmosphere of prolonged uncertainty about its future.
  - (ii) Organisational Change: as a result of the Action Plan to address weaknesses identified in each of the three organisations (see para 17 (iii) above), POCL, BA/DSS and ICL Pathway ramped up their resources and made personnel and structural changes to improve their support for Horizon. For POCL, one element of this work was to bring in the functions of the PDA into POCL under the leadership of a POCL Director (David Miller) who reported directly to the MD/POCL and joined the CEC (Counters Executive Committee). Transfer of responsibilities between BA and POCL during this time took some time to complete and would have been a source of some distraction at working levels of the PDA.
  - (iii) Legal uncertainty: PA had identified slippage against milestones in the Revised Master Plan. This constituted a breach of the BA/POCL contract with ICL and necessitated a legal response. There was disagreement

between BA and POCL on how to treat this breach of contract. Ultimately a Notice of Breach was issued in November 1997. In response, in December 1997, Pathway requested an increase in price and an extension of the contract. This added further pressure on BA's Business case. All 3 parties continued to work on the programme at their own risk but the need for a decision on the future of the programme became more pressing. On the ground, it led to difficulty in agreeing changes that could increase the individual organisations' risks and liabilities. For an example see briefing paper on "Redefinition of the BES/PAS Boundary - Additional Risk to POCL", attached to an email dated 17th December 1998 from John Meagher to David Miller (WITN0413\_01/03; POL00028579).

#### Outcome of Working Group Review

20. Once the PDA was re-organised and absorbed within POCL, my role changed and became focused on plans for the future of Horizon. I do not recall being involved in the Treasury Review undertaken by the "Independent Panel of experts chaired by the Chief Executive of the Treasury Task force on Private Finance" (as per para 19 (i) above), but I was involved in responding to tasks generated by the Horizon Working Group. This was an extended version of the Inter-Departmental Working Group which was led by the Treasury and included Government officials from other Treasury Departments, DTI, DSS, CITU and senior representatives from BA and POCL. Jonathan Evans, the Network Director, represented POCL. The work of this Group was supported by KPMG consultants.

- 21. My work involved facilitating the analytical work being done by KPMG and responding to requests for information and comment from Treasury and DTI officials, who were preparing briefs for their Ministers. Working with my immediate team, and colleagues across the wider business, we built on and developed internal business models to provide KPMG with detailed information on the:
  - underlying assumptions in POCL's business case to enable them to construct a public sector business;
  - (ii) impact of the various fallback options, being considered by the Horizon Working Group, on POCL's business volumes, income, profit and in particular the implications for the size and shape of its network of post offices.
- 22. In July 1998, a Working Group report to Ministers concluded that "the project is feasible but dependent on successful renegotiation with ICL based mainly on extension of the contract period." (See WITN0413\_01/01; POL00000805).

#### **Negotiations September – December 1998**

23. In September 1998: "Ministers authorised Graham Corbett to facilitate discussions between the purchasers and ICL whilst officials prepared a fallback position if talks were unsuccessful...." (see WITN0413\_01/01; POL00000805).

- 24. Notes of a meeting on 22<sup>nd</sup> September 1998 (see WITN0413\_01/04; POL00038842) indicate that ground rules for BA and POCL involvement in these negotiations were set by DSS and DTI, acting jointly. Paul Rich and George McCorkell were identified as Lead Negotiators for POCL and BA, and both made it clear that the final deal must be acceptable to the PO Board and Permanent Secretary of DSS respectively.
- 25. I cannot remember being directly involved in any discussions between Graham Corbett and the parties. A letter from Paul Rich to George McCorkell dated 13th October 1998 (WITN0413\_01/05; POL00038841) indicates that there were discussions between Graham Corbett, Paul Rich and MD/POCL and POCL did respond to Mr Corbett's Proposal of 12<sup>th</sup> October 1998.
- In October 1998 "Mr Corbett informed Ministers that the talks with ICL had proved unsuccessful." and in October-November 1998 "there were discussions between ICL and POCL." (see WITN0413\_01/01; POL00000805).
- 27. I cannot remember why Graham Corbett's negotiations were unsuccessful, nor do I recall participating in discussions with ICL subsequently. It is quite possible that I did attend some meetings between senior Business leaders in POCL and ICL, in a supporting role.
- 28. My letter to Sarah Mullens, dated 11<sup>th</sup> December 1998 (WITN0413\_01/06; POL00028330) indicates that some progress was made in securing

improvements to the position reached by Graham Corbett before he pulled out and that ICL did make a further proposal in December 1998.

29. At this time, KPMG were supporting Treasury-led negotiations on the bones of a deal with ICL, by modelling in real time, the impact on the parties' profitability, cash flow and the level of subsidies that would be required by the Post Office to support vulnerable sub-post offices, for the various options being examined. My main role was facilitating POCL's response to requests for information from KPMG and supporting senior POCL business managers with briefing as required.

# Joint Sponsors position on the future of Horizon: BA

- 30. Discussions between POCL and BA on the future of Horizon were conducted mainly in the forum of the Horizon Working Group meetings with Government officials present. In that forum there was generally a spirit of co-operation, facilitated, I think, by occasional high-level contacts between Treasury officials and senior leaders in POCL, BA and ICL.
- 31. Nevertheless, from my reading of: notes of meetings at this time; feedback where there had been off-stage discussions between senior leaders of BA and POCL; and the scenarios that KPMG were being asked to model, it was clear to me, at the time, that there was a significant divergence of opinion between POCL and BA on the future of Horizon.

- 32. BA was under increasing pressure to make savings under the latest
  Government spending cuts. Coming on top of programme slippage (which
  meant increased costs for continuing to support Horizon), Pathway's request for
  a price rise and an extension to the length of their contract was completely
  unacceptable to BA.
- 33. Programme slippage delayed the achievement of fraud savings built into BA's Business case and their ability to reconcile their accounts, which meant that their accounts would continue to be qualified.
- 34. Horizon was a distraction from work required to bring in other benefits payment changes DSS needed to introduce, especially when a new Government came in and wanted to make Welfare Policy changes.
- 35. On the technical front, BA were being increasingly bullish with their demands on testing and sceptical of Pathway's ability to meet the next contractual milestone for Live Trial.
- 36. While they were not entirely transparent about progress on development of their own back-end system (CAPS), they were confident that any legal action by ICL would not be successful.
- 37. At Departmental level, DSS had a wider Government remit to consider and were therefore more measured in their proposals for the scenarios being considered at Horizon Working Group meetings. Nonetheless their strategic

aim was to migrate benefit payments into recipients' bank accounts via

Automated Credit Transfer (ACT) as soon as possible. This was both cheaper
and more secure. Working behind the scenes DSS officials took every
opportunity to ensure that the option to scrap the Benefits Payment Card and
move straight to ACT was kept at the forefront of Ministers' minds.

# Joint Sponsors position on the future of Horizon: POCL

- 38. POCL's key strategic aim was to retain as much Benefits payment business as possible, for as long as possible. Benefits payment constituted 30% of business transacted in post offices and was a major driver of customer footfall, which was important to retaining other POCL business and particularly important to the generation of private business for 19,000 sub postmasters. Without Government support to manage change, a sudden loss of benefits payments to ACT could lead to large-scale closure of offices, staff redundancies and a collapse in the commercial value of small businesses that ran sub post offices.
- 39. POCL needed time to replace the natural decline in benefits payments (caused by voluntary take up of ACT by benefit recipients) with more efficient services for its other major clients, as well as new business identified in the Banking, Bill Payment and Ticketing markets. It required an automated network in order to be competitive in these markets and to avoid introducing ad hoc pieces of technology into its outlets. POCL was therefore very keen to retain the whole project and most especially the Benefits Payment Card element, for as long as possible.

40. Strategically POCL had more in common with ICL in terms of wanting to pursue new business opportunities. POCL preferred to work collaboratively with ICL Pathway to protect the continuation of the programme in its current form, and explore future business opportunities together, rather than pursuing a combative negotiating strategy that could result in ICL walking away and suing the sponsors.

# Ministerial Meeting 14 December 1998

- 41. The results of KPMG's work for the Horizon Working Group were fed into the briefing for this meeting. The final draft of the Factual Note to the Chief Secretary of the Treasury (WITN0413\_01/07; POL00028328) outlines the options Ministers were faced with.
- 42. I do not recall if the record of this Ministerial meeting was ever fully shared with POCL. What I have found is WITN0413\_01/8; POL00028529 and this leads me to recall that it was at this stage, or very shortly after, that POCL was given an indication that the option to continue with the programme in its current form was no longer on the table and that removal of the Benefit Payment Card from the programme was a serious consideration.
- 43. I have been asked to comment on WITN0413\_01/09; POL00038829. It includes a memo dated 8<sup>th</sup> December 1998, from the BA/POCL Joint Programme

  Lawyer to the Lead Negotiators in BA and POCL, referencing a "short update" from the Director of Project Mentors. He advised that the (Project Mentors) team had "documented a further specific failure by ICL Pathway to follow good

industry practice in meeting the Authorities' requirements. This may also have an operational impact which you will wish to consider.".

- 44. I do not recall this memo and cannot comment definitively on it, because the "short update" it references is not available. I can surmise that it relates to the contents of the covering letter and section of Project Mentors' report that was subsequently forwarded to the parties by the Joint Programme Lawyer, on 18<sup>th</sup> December 1998, also included in WITN0413\_01/09; POL00038829. I must have seen these documents as they were cc'd to myself and David Miller, the Horizon Programme Director, on 21<sup>st</sup> December, and the handwritten note from his secretary indicates that I emailed him about Project Mentors on 30<sup>th</sup> December. Without my personal records, I cannot say what I said or did or who else in POCL or the Post Office was aware of its contents. Given its designation as Legally Privileged and Confidential and the stricture from the Joint Programme Lawyer that "it should be given the most limited possible circulation on a need to know basis," I believe it would have been treated very sensitively, but also feel sure that its contents would not have been withheld from senior decision makers in either organisation.
- 45. I am not equipped to comment on the quality of the technical analysis that underpinned Project Mentors' conclusions. I would have expected the Horizon Programme Director to take a view on this. I would question the validity of the legal argument that ICL Pathway had breached the terms of Clause 702 of the Joint Agreement. The Joint Programme Lawyer did not address this point. I feel certain that I would have sought legal advice from POCL's lawyers

- 46. Before the receipt of the memo of 8<sup>th</sup> December 1998, I would have been aware of the work of Project Mentors (WITN0413\_01/10; POL00031127); they had been commissioned by the Joint Programme Lawyer to investigate post Feb 1997 allegations made by ICL, that sponsors had contributed significantly to the delays which led to their breach of contract. And I would have been aware that he had subsequently proposed to extend their investigations to include pre-Feb 1997 activities, in order to support his recommendation that an aggressive litigation strategy should be pursued as part of the Public Sector's negotiating strategy, as well as to prepare for such an eventuality if negotiations were unsuccessful. (WITN0413\_01/11; POL00038827 and WITN0413\_01/12; POL00031126).
- 47. Government officials were aware that Project Mentors had been commissioned by the Joint Programme Lawyer and of their findings relating to post Feb 1997. (see para 19 of WITN0413 01/13; POL00028091).
- 48. With the benefit of hindsight, and from a purely layman's perspective, I believe I would have questioned the credentials of Project Mentors to conduct the review; the robustness of their largely paper-based investigation; the subjective nature of their arguments in response to ICL allegations; and the fact that they did not appear to give any consideration to the difficulty of defining and interpreting requirements within the commercial constraints of a PFI contract.
- 49. Given the timing of its receipt (so close to the decision-making Ministerial meeting on 14<sup>th</sup> December 1998) and its urgent tone suggesting significant

findings, I would speculate that that the contents of the memo of 8<sup>th</sup> December 1998 were almost certainly shared with the Government officials on the Horizon Working Group and possibly Ministers, and go so far as to think that it may well have had some bearing on the decision to extricate the Benefit Payment Card from the Programme.

# **Negotiations January – May 1999**

- 50. "Negotiations proceed to agree Terms on which the Benefits Payment Card may be removed from the Project" (see WITN0413\_01/01; POL00000805).
- 51. I do not remember what happened in January and February: I think there may have been high-level soundings of senior Business leaders in the Post Office and ICL by senior Treasury officials.
- 52. In March 1999, KPMG were brought back in by Treasury, to support the negotiations they appeared to be leading, by building on the work they had previously done and reported on in October 1998. Principally, this involved modelling the impact of a series of options on the NPV (net present value) of BA and POCL's Business cases. As in Autumn 1998, I would have been involved in supporting the work of KPMG and Treasury officials by responding very quickly to requests for information.
- 53. I cannot remember how negotiations were conducted at this stage and who was involved. The documents I have reviewed are not helpful on this area.
  Neither am I clear on what the final outcome of these negotiations was, but

clearly they had progressed sufficiently for Government to make an announcement on the future of Horizon on 24<sup>th</sup> May 1999: "Announcement of agreement that Department of Social Security's contract has been terminated and that Post Office Counters Ltd and Pathway have agreed in principle to set up a new conventional (non-PFI) contract to continue the project to automate the national network of post offices." (see WITN0413\_01/01; POL00000805).

# Impact on POCL

- 54. POCL was bitterly disappointed at the decision to remove the Benefits Payment Card from the programme. However, securing Government commitment to a network-wide automated platform was an important contribution to its strategic aims, provided that it could:
  - (i) slow down the pace of BA's plans for moving directly to compulsory ACT;
  - (ii) successfully develop a Banking solution that could be used on the automation platform;
  - (iii) obtain some relief from Treasury for the very substantial damage to the Post Office Group's bottom line and funding for subsidies that would be needed to support vulnerable sub post offices, hardest hit by the loss of Benefits payment business.

# Negotiations June - July 1999

55. Without access to my own diary or personal papers, I cannot remember what part I played in these negotiations or how they were conducted. In the Meeting minutes of the Horizon Working Group meeting of 22 June 1999

- (WITN0413\_01/14; NFSP00000203), MD/POCL indicated that negotiation had essentially been conducted between Treasury and ICL.
- 56. The Government's announcement on 24th May 1999 was meant to be supported by a Letter and Heads of Agreement on future arrangements for the automation of post offices without the Benefits Payment Card. In his covering note of 11th June 1999, Keith Baines (POCL's ICL Contract Manager) informed colleagues that the Letter and Heads of Agreement with ICL (WITN0413\_01/15; POL00028523) had now been agreed and "will form the basis of changes to the contract in order to provide the Codified Agreement to be signed on the 16<sup>th</sup> July".
- 57. I have no recollection of the negotiations that led to the production of the Letter and Heads of Agreements referred to, and despite extensive review of the documents provided by the Inquiry Team, I am completely unable to piece together the sequence of events that led to the eventual signing of the contract in July 1999 (WITN0413\_01/01; POL00000805).
- 58. At around this time (in June 1999), I was engaged in negotiations with BA on the future contract between POCL and BA. These negotiations quickly ran aground by the end of June 1999, on a number of issues which are well set out in WITN0413\_01/16; NFSP00000041.
- 59. The lack of progress on agreeing commercial terms for the BA contract was reported to DTI Ministers. It was so significant to the final agreement with ICL,

that it was quoted as one of the two reasons why the main Post Office Board chose to delay and reserve the final sign off on the ICL contract to its CEO (John Roberts) and Chairman (Neville Bain) on 19/20<sup>th</sup> July 1999. The other reason the Post Office Board reserved its position was its concerns over "the high level acceptance incidents still awaiting resolution." WITN0413\_01/17; POL00028520.

- 60. I was not involved in the Acceptance process this was the remit of Horizon's Programme Director. I was well aware of its significance to the delivery of Horizon because it had been highlighted in the Graham Corbett proposal and covered in subsequent negotiations. (I note that It appears to have been addressed at Schedule 6 (Pages 24-26) WITN0413\_01/15; POL00028523).
  I will say that my own experience of working with members of the Horizon team who would have been involved in the process of acceptance, leave me in no doubt that they would have been thorough and conscientious.
- 61. I cannot remember how the two issues that delayed the sign off on POCL's contract with ICL were finally resolved. The BA Contracts Manager and the ICL Contract Manager moved to reporting directly to the Horizon Programme Director, David Miller, when I left the programme.
- 62. Finally, I have been asked about my involvement with end users of Horizon. My role did not entail any such involvement. I did occasionally provide updates on Horizon to internal POCL audiences and WITN0413\_01/14; NFSP00000203 has reminded me that I attended a meeting in July 1999 of the Horizon Working

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Group in that capacity. This was not the Treasury-led Horizon Working Group,

but an internal POCL group of staff and sub postmasters' representatives,

chaired by a DTI Minister. As the Notes of that meeting show, the discussions

were largely about the implications of changes to the ICL contract with POCL

and DSS plans for ACT.

Closing remarks

63. I would like to conclude my statement by saying how very sad and disappointed

I personally feel that Horizon, which my colleagues and I worked so long and

hard to retain, because we believed, in all good faith, that it would secure the

long term future of POCL's business and preserve its network of sub post

offices, will now, forever, be associated with hurting the many people whose

livelihoods we wanted to protect.

**Statement of Truth** 

I believe the content of this statement to be true.

Position or Office held:

Horizon Development Manager,

Post Office Counters Limited

Dated: 12th September 2022

# Index to First Witness Statement of Mena Rego WITN0413 01

	Exhibit No.	Document Description	Control Number	URN
<b>**</b>	WITN0413_01/01	NAO Report into Cancellation of the Benefits Payment Card	VIS00001819	POL00000805
2	WITN0413_01/02	PA Consulting Group: Review of BA- POCL Programme, 1 Oct 1997	POL-0024574	POL00028092
3	WITN0413_01/03	Email from John Meagher to Dave Miller, re Acceptance Specifications and a report on 'Redefinition of the BES/PAS Boundary - Additional Risk to POCL', 25 Nov 1998 (V.1.0 Draft) by Jeremy Foulkes	POL-0025061	POL00028579
4	WITN0413_01/04	Minute of Meeting: POCL, DTI, DSS and BA, 22 September 1998	POL-0027628	POL00038842
5	WITN0413_01/05	Letter from POCL to BA / DSS, 13 October 1998	POL-0027627	POL00038841
6	WITN0413_01/06	Letter from Mena Rego of POCL to Sarah Mullens at HM Treasury re 'Sarah Graham's Letter'	POL-0024812	POL00028330
7	WITN0413_01/07	Factual Note for Chief Secretary to Circulate to Colleagues on BA/POCL Automation (draft) with fax cover sheets	POL-0024810	POL00028328
8	WITN0413_01/08	Fax from David Sibbick, Director Posts, to Jonathan Evans, POCL, re Advantages in Easing Migration to ACT, Horizon Contingency Options Meeting, Option 1 flowchart	POL-0025011	POL00028529
9	WITN0413_01/09	8 <sup>th</sup> December memo from Joint Programme Lawyer to Paul Rich and George McCorkell enclosing urgent information from Project Mentors and follow up on 18 <sup>th</sup> Dec 1998 enclosing relevant section of their Report	POL-0027615	POL00038829
10	WITN0413_01/10	Fax: Bird and Bird to POCL with various enclosures 28th August 1998	POL-0027611	POL00031127
11	WITN0413_01/11	Fax: Bird and Bird to POCL enclosing legal memo 1st September 1998	POL-0027613	POL00038827
12	WITN0413_01/12	Fax: Bird and Bird Memorandum :Bird and Bird to POCL, 18 <sup>th</sup>	POL-0027610	POL00031126

		September 1998 and various enclosures		
13	WITN0413_01/13	Fax from Adam Sharples Public Enterprise Partnership Team to members of the Working Group re Horizon Working Group, meeting minutes dated 25/09/1998 and timetable.	POL-0024573	POL00028091
14	WITN0413_01/14	Meeting minutes of Horizon Working Group meeting of 22 June 1999 and agenda for meeting on 27 July 1998		NFSP00000203
15	WITN0413_01/15	Letter from Keith Baines to Bruce McNiven, Chris French, Andy Radka, John Meagher, Douglas Craik re Letter & Heads of Agreement with ICL Pathway	POL-0025005	POL00028523
16	WITN0413_01/16	Letter dated 1 July 1999 to DTI regarding contract negotiations with BA with attached letter to DSS	VIS00007489	NFSP00000041
17	WITN0413_01/17	Internal Email from Mena Rego to POCL and Jeff Triggs re PO Board Meeting 19/20 July 1999 and Trade & Industry Select Committee Hearing Note 14 July 1999	POL-0025002	POL00028520