28 October 2022

1		Friday, 28 October 2022	1
2	(10.05)		2
3	SIR WYN WI	LLIAMS: Morning everyone. Morning, Mr Blake.	3
4	MR BLAKE:	Morning, sir. Today's witness is David Miller.	4
5		DAVID MILLER (affirmed)	5
6		Questioned by MR BLAKE	6
7	MR BLAKE:	Thank you. Can you give your full name please?	7
8		Villiam Miller.	8
9		r, in front of you should have a witness	9
10		ent in a bundle. Is that witness statement dated	10
11	•	tember of this year?	11
12	A. It is.		12
13		final page, or page 18, is that your signature?	13
14	A. It is.		14
15		statement true to the best of your knowledge and	15
16	belief?		16
17		s one point, if I may, in I think it's	17
18		iph 24	18
19 00		s we could bring it on screen. It's WITN03470100.	19
20		I have said "I was not aware of any issue with	20
21		bility to assist with the automation process",	21
22		ould have been "I was not aware of any overriding	22
23		Clearly there are lots of issues that are in	23
24 25	the bun <b>Q.</b> Thank y	ole. /ou. Mr Miller, we have all day. We will	24 25
		1	
1	Counter	rs Limited, and you were a deputy director in that	1
2	position	; is that right?	2
3	A. Yes.		3
4	<b>Q</b> . In 1998	, you took over as Horizon programme director.	4
5	Your wi	tness statement says it was at short notice. Are	5
6	we to re	ead anything into that in particular?	6
7	<b>A.</b> No. It w	vas but it was at short notice.	7
8	<b>Q</b> . Do you	know why that was?	8
9	A. I think the	here was a view taken about the right people to	9
10	do the r	ight jobs and the person who was doing it at	10
11	that poi	nt, I think, had other skills and therefore	11
12	l was dr	rafted in.	12
	Q. So you	were considered to be better skilled for the job?	13
13	• • • · ·	e so.	14
	A. I believe		
14		feel qualified for that role?	15
14 15	Q. Did you	feel qualified for that role? onscious that I did not have a technical	15 16
14 15 16	<ul><li>Q. Did you</li><li>A. I was compared</li></ul>		
14 15 16 17	<ul><li>Q. Did you</li><li>A. I was construction</li></ul>	onscious that I did not have a technical	16
14 15 16 17 18	<ul><li>Q. Did you</li><li>A. I was construct background nothing</li></ul>	onscious that I did not have a technical ound, but I did have a background in delivering,	16 17
14 15 16 17 18 19	<ul><li>Q. Did you</li><li>A. I was construct background nothing</li></ul>	onscious that I did not have a technical ound, but I did have a background in delivering, of this size, but a significantly sized	16 17 18
14 15 16 17 18 19 20	<ul> <li>Q. Did you</li> <li>A. I was construct backgrown backgrown on thing nationwn before.</li> </ul>	onscious that I did not have a technical ound, but I did have a background in delivering, of this size, but a significantly sized	16 17 18 19
14 15 16 17 18 19 20 21	<ul> <li>Q. Did you</li> <li>A. I was construct backgrown on thing nationw before.</li> <li>Q. Do you</li> </ul>	onscious that I did not have a technical bund, but I did have a background in delivering, of this size, but a significantly sized ride project for the Post Office a few years	16 17 18 19 20
14 15 16 17 18 19 20 21 22	<ul> <li>Q. Did you</li> <li>A. I was constrained backgrown on thing nationw before.</li> <li>Q. Do you there an another the there and the there and the there and the the the the the the the the the the</li></ul>	onscious that I did not have a technical ound, but I did have a background in delivering, of this size, but a significantly sized ride project for the Post Office a few years remember how you were selected for the role: was	16 17 18 19 20 21
13 14 15 16 17 18 19 20 21 22 23 24	<ul> <li>Q. Did you</li> <li>A. I was constrained backgrown on thing nationw before.</li> <li>Q. Do you there an or were</li> <li>A. I was</li> </ul>	onscious that I did not have a technical bund, but I did have a background in delivering, of this size, but a significantly sized ride project for the Post Office a few years remember how you were selected for the role: was in interview process, was it a competitive process	16 17 18 19 20 21 22

	probably finish around 3 o'clock at the latest, but
	so I will take you through relatively slowly today,
	perhaps slower than those witnesses who were on
	yesterday, because we do have time, and if you need any
	time to look at any documents that are on screen, please
	do say.
	Your witness statement and exhibits are now in
	evidence, so the areas that I will be covering will be
	supplementary largely, although I will start with your
	background.
	You joined the Post Office in 1970 as a management
	trainee; is that right?
Α.	That's correct.
Q.	What was your academic background: was it technical,
	managerial or?
Α.	It was academic.
Q.	Academic. You moved to Post Office Counters Limited in
	1983?
Α.	Correct.
Q.	In 1994 to 1995 you were senior line manager for post
	offices in South West England.
Α.	That's correct.
Q.	In 1995 you moved to the Horizon project in what we know
	is the Programme Development Authority, that's the joint
	programme between the Benefits Agency and Post Office
	2
0	Sorry I haliave there may be an issue with the
Q.	<u>, , , , , , , , , , , , , , , , , , , </u>
	transcript? No? No, that's fine, thank you.
	You have acknowledged in your statement it is
	paragraph 51(c) of your statement, if it assists that
	Post Office Counters Limited lacked experience in really
	big IT projects at the time. Were you aware of any
	attempt to recruit people at managerial level with those
	kinds of expertise?
Α.	No. I think there was a tendency to look for when
	you say "recruit", I'm sorry, there was a tendency to
	use people from other organisations who would be moved
	in to do specific roles and functions.
Q.	But at managerial level I mean, we have heard from
	some witnesses who spent a long time in the Post Office
	and worked their way up. Did you feel that there was
	a sufficient attempt to build technical expertise, for
	example, at a higher level in the organisation?
Α.	That was that sort of expertise was held in Group,
	who had a IT director and a IT function, and, in fact,
	a number of people came to work on the programme
	eventually from that area, so IT resource tended to be
	recruited centrally into Group.
Q.	When you say "Group", that's the Post Office Group that
	included Royal Mail, at the time
Α.	Yes.
	4

1	Q.	Post Office Counters Limited
2	Q. A.	There was an overarching organisation, which I'm
2	А.	
		referring to as "Group", which sat above the constituent
4	-	businesses.
5	Q.	Would you rely on them to provide that expertise or
6		provide the people who had those expertise?
7	Α.	Yes. There was some in the programme phase, there
8		was some bringing in of expertise from outside, but that
9		would have been coordinated with Group IT.
10	Q.	We have heard that it was the Post Office board, not the
11		Post Office Counters Limited board, that took where
12		the real decisions were made
13	Α.	Yes.
14	Q.	would you agree with that? Yes.
15		You have said at paragraph 41 of your statement that
16		the board did not involve itself in day-to-day Horizon
17		matters, only the bigger picture. Was that something
18		you knew at the time?
19	Α.	Yes.
20	Q.	Did it concern you at all?
21	Α.	The sponsor of the project was my immediate boss and he
22		sat on that board.
23	Q.	Who was that, sorry?
24	Α.	Stuart Sweetman.
25	Q.	Yes.
		5
1		9 May. Could we go over the page to page 3. So this is

•		o may. Could we go over the page to page of the the
2		a meeting, 9 May 1995, and you are listed there as
3		present as a representative of as a representative of
4		the Benefits Agency and Post Office Counters Limited, or
5		representing
6	Α.	"BA/POCL" was a term that was used for the PDA, for the
7		delivery organisation.
8	Q.	Can you very briefly remind us what the programme
9		management board was?
10	Α.	It was looking at progress on what was happening in the
11		PDA.
12	Q.	Can we turn over the page to page 4 and look at
13		paragraphs 2.5 and 2.6. I don't think I need to read
14		them out aloud, but perhaps you can just briefly look at
15		2.5 and 2.6. There's an update there that PA
16		consultancy have been constructed to study the wider
17		Benefits Agency programme, and there were two further
18		pieces of work. Then at 2.6, it says:
19		"David Miller was concerned that this would result
20		in a delay to the programme."
21		1995, it's quite early in the story, but were there
22		time pressures at that stage?
23	Α.	I think in any programme of this sort there are time
24		pressures. Time pressures intensified as the time
25		period went on.
		7

1	Α.	So it didn't concern me at that time.
2	Q.	Was that because you had faith in Mr Sweetman to tell
3		the board what they needed to know?
4	Α.	Yes.
5	Q.	You said "at the time", is that no longer the case?
6	Α.	No sorry, I thought we were talking about events at
7	-	this particular time and that was the case.
8	Q.	And is it still the case?
9	Α.	Yes.
10	Q.	Did, in your opinion, the board place a lot of faith
11		then in what they were told?
12	A.	Yes.
13	Q.	John Roberts has given evidence about the commercial
14 15		importance of the Horizon project. Is that something
15 16	A.	that you were aware of at the time? Very much.
17	А. Q.	Did you see it as vital to the survival of the Post
18	ц.	Office?
19	Α.	l did.
20	Q.	I'm going to take you through chronologically today
21	٩.	I'm going to go far back, I'm going to start in 1995 but
22		I won't stay on those early years for too long. But
23		let's start in 1995 and let's look at DWP00000006,
24		please.
25		That is a programme management board meeting of
		6
1	0	But this is quite early on?
1 2	Q. A.	But this is quite early on? Yes
2	Α.	Yes.
		Yes. Were those time pressures felt from the moment you
2 3	Α.	Yes. Were those time pressures felt from the moment you joined in your role?
2 3 4	A. Q.	Yes. Were those time pressures felt from the moment you joined in your role? Because it was a programme I was aware that things
2 3 4 5	A. Q.	Yes. Were those time pressures felt from the moment you joined in your role? Because it was a programme I was aware that things should be done to time, but there wasn't inordinate
2 3 4 5 6	A. Q.	Yes. Were those time pressures felt from the moment you joined in your role? Because it was a programme I was aware that things
2 3 4 5 6 7	A. Q. A.	Yes. Were those time pressures felt from the moment you joined in your role? Because it was a programme I was aware that things should be done to time, but there wasn't inordinate pressure at this stage.
2 3 4 5 6 7 8	A. Q. A.	Yes. Were those time pressures felt from the moment you joined in your role? Because it was a programme I was aware that things should be done to time, but there wasn't inordinate pressure at this stage. Can we look at 2.9, please. Again, I don't think the
2 3 4 5 6 7 8 9	A. Q. A.	Yes. Were those time pressures felt from the moment you joined in your role? Because it was a programme I was aware that things should be done to time, but there wasn't inordinate pressure at this stage. Can we look at 2.9, please. Again, I don't think the detail of this particular paragraph is all that
2 3 4 5 6 7 8 9	A. Q. A.	Yes. Were those time pressures felt from the moment you joined in your role? Because it was a programme I was aware that things should be done to time, but there wasn't inordinate pressure at this stage. Can we look at 2.9, please. Again, I don't think the detail of this particular paragraph is all that relevant. It's the final sentence which says:
2 3 4 5 6 7 8 9 10 11	A. Q. A.	Yes. Were those time pressures felt from the moment you joined in your role? Because it was a programme I was aware that things should be done to time, but there wasn't inordinate pressure at this stage. Can we look at 2.9, please. Again, I don't think the detail of this particular paragraph is all that relevant. It's the final sentence which says: "David Miller had staff come in to these areas
2 3 4 5 6 7 8 9 10 11 12	A. Q. A.	Yes. Were those time pressures felt from the moment you joined in your role? Because it was a programme I was aware that things should be done to time, but there wasn't inordinate pressure at this stage. Can we look at 2.9, please. Again, I don't think the detail of this particular paragraph is all that relevant. It's the final sentence which says: "David Miller had staff come in to these areas shortly."
2 3 4 5 6 7 8 9 10 11 12 13	A. Q. A.	Yes. Were those time pressures felt from the moment you joined in your role? Because it was a programme I was aware that things should be done to time, but there wasn't inordinate pressure at this stage. Can we look at 2.9, please. Again, I don't think the detail of this particular paragraph is all that relevant. It's the final sentence which says: "David Miller had staff come in to these areas shortly." It looks from that paragraph as though you were
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2 3 4 5 6 7 8 9 10 11 12 13 14 15	А. Q. А.	Yes. Were those time pressures felt from the moment you joined in your role? Because it was a programme I was aware that things should be done to time, but there wasn't inordinate pressure at this stage. Can we look at 2.9, please. Again, I don't think the detail of this particular paragraph is all that relevant. It's the final sentence which says: "David Miller had staff come in to these areas shortly." It looks from that paragraph as though you were building up a technical team of some sort; would that be right?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	А. Q. А. Q. А. Q.	Yes. Were those time pressures felt from the moment you joined in your role? Because it was a programme I was aware that things should be done to time, but there wasn't inordinate pressure at this stage. Can we look at 2.9, please. Again, I don't think the detail of this particular paragraph is all that relevant. It's the final sentence which says: "David Miller had staff come in to these areas shortly." It looks from that paragraph as though you were building up a technical team of some sort; would that be right? Yes, that would be right. Again, I think you told us just earlier, that the managerial technical team had come from the board, but how would you find these staff? Well, there would be discussions with the central IT
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	А. Q. А. Q. А. Q.	Yes. Were those time pressures felt from the moment you joined in your role? Because it was a programme I was aware that things should be done to time, but there wasn't inordinate pressure at this stage. Can we look at 2.9, please. Again, I don't think the detail of this particular paragraph is all that relevant. It's the final sentence which says: "David Miller had staff come in to these areas shortly." It looks from that paragraph as though you were building up a technical team of some sort; would that be right? Yes, that would be right. Again, I think you told us just earlier, that the managerial technical team had come from the board, but how would you find these staff? Well, there would be discussions with the central IT function about what the roles required and they would
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	А. Q. Q. А. Q. А.	Yes. Were those time pressures felt from the moment you joined in your role? Because it was a programme I was aware that things should be done to time, but there wasn't inordinate pressure at this stage. Can we look at 2.9, please. Again, I don't think the detail of this particular paragraph is all that relevant. It's the final sentence which says: "David Miller had staff come in to these areas shortly." It looks from that paragraph as though you were building up a technical team of some sort; would that be right? Yes, that would be right. Again, I think you told us just earlier, that the managerial technical team had come from the board, but how would you find these staff? Well, there would be discussions with the central IT function about what the roles required and they would aim to fill those. Can we move on to 1996, please, and look at POL00028451. Now, this is a meeting of the Major Project Expenditure
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	А. Q. Q. А. Q. А.	Yes. Were those time pressures felt from the moment you joined in your role? Because it was a programme I was aware that things should be done to time, but there wasn't inordinate pressure at this stage. Can we look at 2.9, please. Again, I don't think the detail of this particular paragraph is all that relevant. It's the final sentence which says: "David Miller had staff come in to these areas shortly." It looks from that paragraph as though you were building up a technical team of some sort; would that be right? Yes, that would be right. Again, I think you told us just earlier, that the managerial technical team had come from the board, but how would you find these staff? Well, there would be discussions with the central IT function about what the roles required and they would aim to fill those. Can we move on to 1996, please, and look at POL00028451.

7

(2) Pages 5 - 8

		did	4
1		did you?	1
2 3	A.	No.	2 3
3 4	Q.	Certainly not on this occasion. Can we look at page 3, please. I don't know if you have been following	4
4 5			4 5
6		previous hearings, but we have looked at this document before and we have looked at the procurement exercise	6
7		and the Tom, Dick and Harry exercise. Do you remember	7
8		that?	8
9	۸	Yes. I'm familiar with it.	9
10		Can we look at (xxi) on that page, so it's at the	10
11	ч.	bottom, and it says there this is just really for	10
12		clarification.	12
13		In your statement, it is paragraph 26, you said that	13
14		Pathway wasn't awarded the contract because it was the	14
15		cheapest option. Just, I think for clarification, you	15
16		are aware that it was, in fact, the cheapest option?	16
17	Α.		17
18		the day, it was the cheapest option.	18
19	Q.		19
20		amongst other things, it had been the most expensive.	20
21		Do you remember that?	21
22	Α.	l do and yes, l do.	22
23	Q.	Can we look at page 4, please, and can we look at (xxvi)	23
24		so it is:	24
25		"As a technical solution 'Dick' was the least	25
		9	
1		detail and then there was a further round of discussions	1
2		and negotiations to try and remedy some of the	2
3		deficiencies of the first round.	3
4	Q.	Yes. At the bottom of this page, it highlights some of	4
5		those risks:	5
6		"The risks associated with 'Dick' were both	6
7		short-term: liable to be late; pressure to accept	7
8		incomplete functionality; premature rollout could prove	8
9		unreliable; and long-term: fragile software system;	9
10		difficult to enhance; if Dick lost money it would be	10
11		difficult to do future changes"	11
12		Again, you were aware of those risks at the time?	12
13	Α.	I haven't seen them put in that way before.	13
14	Q.	But were those risks familiar to you at the time, those	14
15		kinds of risks?	15
16	Α.	Yes, I think so.	16
17	Q.	Then the paragraph below talks about how the risks could	17
18		be managed. Were you aware from the Major Project	18
19		Expenditure Committee which included John Roberts,	19
20		and which heard, we know, from Stuart Sweetman were	20
21		you aware that they considered that risks needed to be	21
22		managed in this way?	22
23	Α.	Yes, I think I was.	23
24	Q.	That included what we see there:	24
25		"rigorous user and system testing prior to rollout	25
		11	

	preferred bidder providing a higher risk to delivering
	the programme."
	Were you aware at the time that ICL Pathway was the
	least preferred when it came to the technical solution?
Α.	I think there were concerns at the time about the
	technical solution, particularly in relation to the use of the product Riposte, but what in reviewing the
	papers, which I have been, what was interesting is that
	Riposte appeared to offer, particularly to the BA,
	distributed functionality, so that data could be passed
	down and held at post offices. And this was, to the BA,
	as I recall at the time, a significant matter.
Q.	Thank you. If we look at the paragraph below it says:
	"The preferred supplier [that's ICL] proposed
	a technical solution for which the architecture was
	unusual (complex design not proven on a large scale
	deployment using bespoke code which then had to be
	modified). Initially 'Dick' did not have the technical
	or project management expertise within their project team, as compared to the other bidders who had proposed
	off-the-shelf solutions to be then modified. This had
	now been addressed by the computer supplier."
	Were you aware of those concerns at the time?
Α.	I was and the process that we went through, in terms of
	tendering, the initial bids were then reviewed in great
	10
Α.	to be built into the contract." Yes.
А. Q.	Then can we look at that final paragraph, to the bottom
હ.	of the page
	Sorry, can we scroll down a little bit. Thank you.
	Those final paragraphs there effectively stress the
	importance of making the system work.
Α.	Yes.
Q.	Were those messages passed back to you by Stuart
	Sweetman or John Roberts or somebody else?
Α.	I don't remember precisely how that happened at the
	I don't remember precisely how that happened at the time.
Q.	I don't remember precisely how that happened at the time. That's fine. The fact that things like this the need
	I don't remember precisely how that happened at the time. That's fine. The fact that things like this the need for rigorous testing prior to rollout were being
	I don't remember precisely how that happened at the time. That's fine. The fact that things like this the need for rigorous testing prior to rollout were being emphasised as a way of meeting the higher technical
	I don't remember precisely how that happened at the time. That's fine. The fact that things like this the need for rigorous testing prior to rollout were being
	I don't remember precisely how that happened at the time. That's fine. The fact that things like this the need for rigorous testing prior to rollout were being emphasised as a way of meeting the higher technical risks, that was all something that you were aware of at
Q.	I don't remember precisely how that happened at the time. That's fine. The fact that things like this the need for rigorous testing prior to rollout were being emphasised as a way of meeting the higher technical risks, that was all something that you were aware of at the time?
Q. A.	I don't remember precisely how that happened at the time. That's fine. The fact that things like this the need for rigorous testing prior to rollout were being emphasised as a way of meeting the higher technical risks, that was all something that you were aware of at the time? It was.
Q. A.	I don't remember precisely how that happened at the time. That's fine. The fact that things like this the need for rigorous testing prior to rollout were being emphasised as a way of meeting the higher technical risks, that was all something that you were aware of at the time? It was. Can we move on another year now to 1997 and can we go to
Q. A. Q. A.	I don't remember precisely how that happened at the time. That's fine. The fact that things like this the need for rigorous testing prior to rollout were being emphasised as a way of meeting the higher technical risks, that was all something that you were aware of at the time? It was. Can we move on another year now to 1997 and can we go to POL00031231, please. This was an internal review in October 1997. Is that something that you remember? I don't remember it, but I have read the document.
Q. A. Q.	I don't remember precisely how that happened at the time. That's fine. The fact that things like this the need for rigorous testing prior to rollout were being emphasised as a way of meeting the higher technical risks, that was all something that you were aware of at the time? It was. Can we move on another year now to 1997 and can we go to POL00031231, please. This was an internal review in October 1997. Is that something that you remember? I don't remember it, but I have read the document. Can we look at the third page, please, and it is
Q. A. Q. A.	I don't remember precisely how that happened at the time. That's fine. The fact that things like this the need for rigorous testing prior to rollout were being emphasised as a way of meeting the higher technical risks, that was all something that you were aware of at the time? It was. Can we move on another year now to 1997 and can we go to POL00031231, please. This was an internal review in October 1997. Is that something that you remember? I don't remember it, but I have read the document. Can we look at the third page, please, and it is paragraph 1.3. It seems that you were part of the team
Q. A. Q. A.	I don't remember precisely how that happened at the time. That's fine. The fact that things like this the need for rigorous testing prior to rollout were being emphasised as a way of meeting the higher technical risks, that was all something that you were aware of at the time? It was. Can we move on another year now to 1997 and can we go to POL00031231, please. This was an internal review in October 1997. Is that something that you remember? I don't remember it, but I have read the document. Can we look at the third page, please, and it is

(3) Pages 9 - 12

1	Α.	Yes, indeed, I contributed to it but I you know, when	1
2		I read this document, I remembered it, but I previously	2
3		hadn't.	3
4	Q.	No. It says there that:	4
5		"Extensive interviews were held with a wide range of	5
6		managers spanning the commercial, financial and	6
7		technical aspects of the programme."	7
8		Can we look at the management summary, that's	8
9		paragraph 2 on the same page, please. It says:	9
10		"Horizon remains crucial to POCL's commercial	10
11		strategy. It is needed as soon as possible and requires	11
12		the full functionality as currently defined, or improved	12
13		within acceptable time limits, and is needed throughout	13
14		the network."	14
15		Now, again, that reference to "as soon as possible",	15
16		echoes of what we heard from 1995: was there some time	16
17		pressure at that stage?	17
18	Α.	Yes, in the sense that, in a programme like this,	18
19		I believe there is always time pressure, but this was	19
20		Post Office reaffirming that Horizon was crucial to its	20
21		strategy and it wanted the full functionality and it	21
22		wanted it throughout the network because there are	22
23		questions as to whether the functionality could be	23
24		descoped and there was the questions as to whether the	24
25		whole network needed the same product. So this was 13	25
1 2	Α.	Yes, I I think that they were asked the question "Should this programme continue?" and that was what they	1 2
3		said.	3
4	Q.	Is your view that "fatally flawed" is too low a baseline	4
5		for consideration of whether to proceed with	5
6		a significant IT project?	6
7	A.	I think, looking at it now, it does rather come off the	7
8		page.	8
9	Q.	Paragraph 2.5:	9
10		"Delay to the completion of Horizon certainly	10
11		enables competitors to attack POCL's share and continued	11
12		erosion of income and market share is inevitable.	12
13		However, there has been no evidence that delays within	13
14		the broad timescales under review present any market	14
15		'show stoppers'."	15
16		So, again, delays impacting business potentially,	16
17		was that something that you remember?	17
18	Α.	Yes, there was activity in the bill payment market,	18
19		particularly, from a company called PayPoint, which was	19
20		of concern to the marketing department.	20
21	Q.	Can we scroll down to paragraph 2.8. We don't	21
22		necessarily need to read that paragraph, but it talks	22
23		about an opportunity, potentially, given by delay, which	23
24		is that it may be possible to find something more	24
25		reliable than EPOSS. Do you remember that at all?	25
		15	

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	a significant set of conclusions.
Q.	Can we go over the page to paragraph 2.4. We read
	earlier the reference to PA Consulting undertaking their
	investigations and it says that:
	"PA Consultants indicates that much improvement
	is needed", but it is not "fatally flawed"; do you
	remember that?
Α.	Yes. Just I wasn't actually on the programme at this
Q.	point. I contributed to this report. When you say you weren't on the programme at this point
હ.	was that because you were on the development board at
	this point or because you were
Α.	No, I had between the development board and becoming
7.	Horizon programme director, I went back to Bristol and
	managed the line for South Wales and South West.
Q.	But you kept an eye on what was going on with the
	Horizon programme?
Α.	And my advice was sought in certain matters regarding
	this report.
Q.	Now, that term "fatally flawed", I have suggested to
	other witnesses that that seems like a low baseline for
	Horizon to satisfy; would you agree with that?
Α.	Sorry, can you just point me
Q.	Paragraph 2.4, it is PA consultants' conclusions that
	they don't suggest the programme is "fatally flawed". 14
	14
Α.	No.
Q.	Do you remember early problems with EPOSS?
Α.	Not at this time because I wasn't involved with the
	programme. The EPOSS product was very much behind the
	work the massive amount of work that went on with
	regard to the Benefits Agency, so I'm aware of that
	order of things.
Q.	Can you remember discussions in 1997 that it may be
	possible to revisit the EPOSS system, given that there
	were delays at that time?
A.	I don't.
Q.	Can we please look at page 15. There's a section there on replacing the manual cash account. I'll read that
	paragraph, it says:
	"It will always be difficult to get a definitive
	statement on this but there appears sufficient evidence
	that POCL's current accounting system is not fully fit
	for purpose. Current systems are error prone and incur
	significant costs to clean up the data before it becomes
	management information, or used for settlement with
	clients. The parallel automation projects, TIP/TMS,
	SAPCON, SAPADS"
	Do you remember those at all?
Α.	I remember some of them.

**Q.** Can you briefly tell us what they were? 

1	Α.	I remember most of all TIP, which was a backend system	1	
2		that was about communicating information to clients in	2	Α.
3		particular.	3	Q.
4	Q.	" [they] all need a sort of transaction data to	4	
5		enable them to operate effectively and deliver the	5	
6		benefits in their individual business cases. This is	6	Α.
7		not to say that there might not be alternative routes to	7	Q.
8		achieving these functionalities but, given the need for	8	
9		the platform for BA it remains logical to use that same	9	
10		platform for EPOSS. This functionality appears to	10	Α.
11		duplicate part of that of TIP/TMS and there is a need to	11	Q.
12		review that to see if better value for money is	12	
13		achievable.	13	Α.
14		"POCL has always suffered from slow, sometimes	14	
15		inaccurate management information of inadequate	15	Q.
16		granularity. The need to squeeze out operational	16	
17		improvements both at outlet level and within the	17	
18		Business' logistics requires a consistent, once only	18	
19		capture of transactional data from outlets. The need to	19	
20		avoid the complexities of dual information streams both	20	Α.
21		for POCL and its clients drives the conclusion that	21	•
22		EPOSS is inescapable, albeit further refinements might	22	Q.
23		be possible if time permits."	23 24	
24		Do you understand that to mean that, for it to work,	24 25	
25		all of the parts, including those other automation 17	20	
1		regarding the continuation of lost transactions, it was	1	Α.
2		anticipated that lost transactions would decline after	2	
3		the software fix dated 16 February 1998. Continuation	3	
4		of this trend will seriously undermine the credibility	4	
5		of the system."	5	
6		Over the page, the bottom of page 4, please, it	6	Q.
7		talks about the Benefit Payment System and it talks	7	
8		about lost transactions, and it says:	8	
9		"ICL Pathway are continuing their investigation	9	
10		concerning the four categories of lost transactions	10	
11		identified in the last interim report. The objective is	11	Α.
12		to ascertain the root cause at the POCL customer	12	
13		interface. Service Management has escalated the	13	
14		aforementioned problems to Product Management for action	14	
15		to facilitate a solution within the ICL Pathway domain."	15	Q.
16		Now, this is very early on, it's 1998, and I think	16	
17		it all relates to the Benefits Agency part of the	17	
18		system, but were you aware, in that period, of concerns	18	
19		relating to lost transactions?	19	
20	Α.	It would be something I would have picked up as I was	20	
21		getting into the project or programme.	21	
22	Q.	So you were aware of it in 1998?	22	
23	Α.	Yes.	23	
24	Q.		24	
25		in this particular document? 19	25	
		13		

1		projects, would need to work effectively together?
2	Α.	I think that's what it says.
3	Q.	And the Horizon System should be used for EPOSS because
4		it is being used for the Benefits Agency part of the
5		project as well; is that your recollection? Sorry?
6	Α.	Yes, I'm sorry.
7	Q.	By logical extension, if Horizon wasn't being used for
8		the Benefits Agency project, a simpler solution might
9		have been sufficient; would you agree with that?
10	Α.	Yes.
11	Q.	Was that something that was being considered at the
12		time?
13	Α.	I don't I'm not sure it was being considered at this
14		time.
15	Q.	Can we move on to 1998, please, and look at POL00028597.
16		Now, that is report that you were sent we can see
17		there that you were on the distribution list and it
18		covers the period February 1998. Do you remember this
19		document at all?
20	Α.	I think I have seen it subsequently and I would have
21		seen it at the time, I was on the distribution list.
22	Q.	Can we look at page 3, please. It is the bottom half of
23		page 3, "End to End Business Continuity", and it says:
24		"Overall there are no major threats to business
25		continuity, however there are still growing concerns
		18
1	Α.	There was a lot of work that went into lost
2		transactions, which was then turned into the term
3		"incomplete transactions", and there was a huge amount
4		of work that went on to analyse what was causing this
5	-	and solutions.
6	Q.	Was the seriousness of those kinds of issues appreciated
7		at the Post Office in 1998.
8		(Pause)
9		I'm not asking you about the document itself but
10		just
11	Α.	No. I'm sorry, but I am really trying to think about
12		what not entirely related to the document.
13		I certainly think that people in the programme
14	•	understood it.
15	Q.	Can we look at another document, POL00069096. This is
16		a document from March/April of the same year, 1998. You
17		can see there, at the bottom, that you are a recipient
18		of notes from a meeting. Can we go over the page,
19		please. It's the Counter Automation Steering Group and,
20		again, you are named as having been present on
21		27 March 1998.
22		Can we look at page 2, please sorry, we're on
23		page 2 the second half of that page. If you look at
24		the top of the page now, it says:
25		"The Committee <u>noted</u> the update by Dave Miller", 20
		20

(5) Pages 17 - 20

1		et cetera.	1		investigated although it was difficult to quantify how
2		So it seems as though you provided an update to that	2		the system would work until after it had been installed
3		meeting. Do you remember that at all?	3		and was operational."
4	Α.	l don't my no, l don't remember it but l was	4		Did you understand from that that live testing was
5		clearly there.	5		therefore important and perhaps more important than it
6	SIF	WYN WILLIAMS: As I understand it, by this time you had	6		had seemed at the procurement stage?
7		become the programme director.	7	Α.	Certainly live testing was going to be important. It's
8	Α.	Yes.	8		the there are words here about "its lack of
9	SIF	RWYN WILLIAMS: Yes, fine.	9		robustness could generate high level errors within
10	Α.	There was a handover period, sir, of three months,	10		POCL". There was some discussion yesterday of this
11		I think, between as the PDA was wound down and the	11		issue and the depth of knowledge in the two
12		Horizon programme took over.	12		organisations about it. So I'm I was clearly aware
13	MR	BLAKE: We can see from the first bullet point there:	13		of it, but I wasn't aware of the detail that was
14		"The PDA would cease to exist on 31 March which	14		revealed yesterday in the first document I believe you
15		control passing to POCL who intended working more	15		discussed.
16		closely with Pathway to develop integrated plans with	16	Q.	Can you give us an indication of what kind of detail
17		clear interdependencies, particularly with regard to	17		that you weren't aware of?
18		POCL feeder systems and implementation", et cetera.	18	Α.	There was a lot of detail about how ICL Pathway had
19		Can we go over the page, please, to point 4.	19		produced the system and ICL Pathway expressing serious
20		I think I have put this to other witnesses, you may have	20		concerns about what had gone on.
21		seen it before, it says:	21	Q.	Absolutely, so it's around this period it's August
22		"Work on EPOSS was continuing and Pathway had	22		and September 1998 that ICL was carrying out what we
23		indicated that whilst it could provide a system which	23		know was the EPOSS PinICL task force. Is that something
24		met the contract, its lack of robustness could generate	24		that you were aware of at the time?
25		high level of errors within POCL. This was being 21	25	Α.	I would have been aware at the time, yes. 22
		• • • • • • • • • • • • • • • •			
1	Q.	So you were certainly aware that there were significant	1	•	needed to take note of.
2		concerns about the EPOSS product?	2	Q.	And accounting integrity, presumably, was pretty central
3		Yes.	3		to the overall project at that stage, or at any stage?
4	Q.		4		Yes.
5		the reference is POL00028320. It's a document of	5 6	Q.	0
6 7		23 November 1998 and it's the Transformation Steering Group. Was this something that you would have received?	6 7		sounds like, it may be either your secretary's or your
	•	Yes, I think I would.	8		own. Do you recognise that? Yes, I do.
8 9	А. Q.	I don't know if you are able to assist with any of the	9	A. Q.	Whose handwriting is that?
9 10	ч.	handwriting that's on it?	9 10	Q. A.	That's my handwriting.
11	•	June Lilley was my secretary at the time.	10	Q.	Perhaps could you read that to us?
12		So it definitely went to your secretary and presumably	11	Q. A.	"Remedial analysis has taken place fully involving TIP
12	ч.	would have been passed to you?	12	А.	and Reference Data personnel. Remedial action is now
14	А.		13		underway. The point must be made that we will not enter
15	Q.		15		the final phase of testing until we are content that we
16	ч.	"There are major concerns about the test results	16		have a robust set of code. The criteria for entering
17		emanating from Model Office and End to End.	10		the final stage of testing being complied by the testing
18		"The results indicate that cash accounts and	18		manager for review by interested parties this week."
19		transaction data delivered to POCL's downstream systems	10	0	Thank you very much. So you're saying there that you
20		lack accounting integrity, all of which raises serious	20	ч.	won't enter the final phase of testing until you are
20		doubt about Pathway's ability to enter into the next	20		confident that you have a robust set of data and that
21		phase of Model Office and End to End testing without	21		was seen by you as the solution to what was then a red
22		some form of remedial action."	22		light issue. Would you agree with that?
23		What did you understand by a "red light issue"?	23	Δ	From the documentation, yes.
25	Δ	A serious issue that the Automation Steering Group	25	Q.	Thank you. Can we go over the page to page 7, please.
20		23	20	-ut.	24

1		Thank you very much. There is a list of existing issues	1
2		and the second one "Horizon testing":	2
3		"The testing strategy is not being deployed as	3
4		originally planned. There is evidence that the early	4
5		phases of testing are not covering the scope that they	5
6		should, and there is a danger that the true purpose of	6
7		MOT testing will be lost, that major faults will be	7
8		detected during it, and that this will result either in	8
9		delay or workarounds."	9
10		You are named as the owner of that particular issue.	10
11		What do you understand by "owner"?	11
12	A.	That it was for me to deal with.	12
13	Q.	And it mentions the red light programme issues there as	13
14 15	Α.	well. Yes.	14 15
15 16	А. Q.	Now, there's a date there when it was raised. This	15
17	પ્ય.	seems to be not just an existing issue, but it seems to	10
18		be an issue that was raised on 24 July 1998, four months	17
19		before; would you agree with that?	10
20	Α.	From the date when it was raised, yes.	20
21	Q.	Now, who should have been testing?	20
22	<u>с</u> . А.	I'm sorry?	22
23	Q.	It says the testing strategy isn't being deployed as	23
24		originally planned; whose fault is all of this?	24
25	Α.	Well, as I was in charge of the programme it was down to	25
		25	
1	Q.	Can we move on to December 1998 and it is POL00038829.	1
2		Now, on this document I think Paul Rich suggested that	2
3		he thought "Dave" was you there. Might that be right?	3
4	Α.	I don't know, but	4
5	Q.	This is the Project Mentors' report being sent?	5
6	Α.	Yes.	6
7	Q.	Is that Mena Rego?	7
8	Α.	That's Mena Rego, so I think it is likely it was me.	8
9		l can't say definitely.	9
10	Q.	Can we look at page 5 of this document, please. Now, is	10
11		this something you remember at all, the Project Mentors'	11
12		report being received from Bird & Bird?	12
13	Α.	I was aware of it. It became a lot clearer to me having	13
14		read this documentation again.	14
15	Q.	An important passage which I have taken previous	15
16		witnesses to is slightly further down sorry, can we	16
17		just scroll slightly there it is.	17
18		It is the quote from Andrew Davies of Project	18
19		Mentors and it says that his team are:	19
20		" deeply concerned that their findings show	20
21		a serious problem with the way in which ICL Pathway have	21
22		developed the system. The impact of this is likely to	22
23		be that there will be failures to meet essential user	23
24 25		requirements, causing the need for extensive rework	24
25		before the system can be accepted and potentially 27	25

1		me to do something about it.
2	Q.	But it says it's not covering the scope that it should.
3		What was going on there?
4	Α.	I'm sorry but I do not recall.
5	Q.	Were you aware that that same month ICL were seeking to
6		amend the acceptance procedures which took some emphasis
7		off live testing? I don't need to go to the document,
8		but the relevant document is POL00031119 and it is
9		page 13, for the purpose of the transcript.
10	Α.	I don't have a memory of that but I would have known at
11		the time, I think.
12	Q.	Do you have a memory of late 1998, some emphasis being
13		taken off live testing at all?
14	Α.	No, I don't.
15	Q.	Now, the previous document that I took you to showed
16		that, for example, EPOSS problems would be difficult to
17		quantify until it was operational. So how important was
18		testing at this time?
19	Α.	I still think it was important to do the testing, to get
20		some indication of what issues might be arising as the
21		thing progressed.
22	Q.	Knowing that there were previous errors or concerns
23		going back quite a few years by this stage, would it
24		have been important to live test the system?
25	Α.	Yes, I think it would.
		26
1		operational problems if the system is rolled out."
2		Is that something that you remember?
3	Α.	I do, having read the documentation.
4	Q.	Can we please go to page 9. This is the paper itself
5		and, over two pages to page 11, please, and it is
6		paragraph 1.3 I would like to look at. This outlines
7		the scope of that Project Mentors' report and the second
8		paragraph at the bottom, it says:
9		"We have to date considered only the BPS system
10		[that's the Benefit Payment System]. Further work has
11		recently started to perform a similar assessment of the
12		approach adopted for other elements of the system, such
13		as EPOSS. Nevertheless our findings are, in our view,
14		sufficiently serious to bring into question the whole of
15		Pathway's design process."
16		Again, presumably something you would have read at
17		the time?
18	Α.	Yes.
-	Q.	Can we look at page 14 of that document, please, and the
19	<b>u</b> .	
19 20	۵.	bottom of that page. So the very final paragraph on

"Of particular concern is the EPOSS system. We are informed that at a relatively early stage Pathway wanted the authorities, principally POCL, to be involved with the design of this element. The plan was to use the 

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1		Rapid Application Development ('RAD') methodology to	1	Δ	l honestly don't know.
2		design this system. This approach was started, but	2		Do you think I mean, Stuart Sweetman, would he have
3		discontinued after some months, when the Pathway staff	3	ч.	known about the report?
4		member involved left the project. The suggestion to use	4	A.	I don't know.
5		RAD leads us to believe that more traditional methods	5		Why would it have been passed to you in particular? If
6		have not been used, and since the RAD experiment was	6	ч.	we look at page 1
7		abandoned, we have doubts whether any proper	7	Α.	Because it had suggestions that there were issues with
8		requirements analysis has been performed."	8		EPOSS.
9		Onto the next paragraph, please:	9	Q.	Do you remember discussing it with anybody?
10		"Impacts on the Programme in the Future	10		I'm sure I would, but I have no recollection.
11		"Our experience of systems where requirements have	11		Do you remember discussing it with ICL at all?
12		not been analysed satisfactorily is that the system	12	Α.	
13		fails to meet the users' needs. An effective acceptance	13	Q.	
14		test will identify many such failings necessitating	14		I would have expected to have got their views on it.
15		considerable rework. The result is a significant	15		The question was: this was a report commissioned by
16		extension of the time and cost required to complete the	16		Bird & Bird for the Benefits Agency, so there might have
17		system and roll it out. The alternative is to allow	17		been issues about content, and so on.
18		unacceptable processing in the operational environment,	18	Q.	We have heard suggestion that it may not have been
19		with unpredictable and potentially damaging results."	19		totally partial. Is that something that you know about
20		Now, we know that this document was passed to you by	20		or shared at the time?
21		Mena Rego. Are you able to tell us who else would have	21	Α.	I mean, the can I just remind on the context of this.
22		seen this document? Perhaps we can look at page 3.	22		This was, at the time, a few months before BA pulled out
23		There are obviously some direct recipients but who,	23		of the project. I think there was concern within the
24		within your organisation, would have seen or at least	24		Post Office that this exercise by project manager
25		known about the contents of this report?	25		Project Mentors, I'm sorry was part of an exercise to
		29			30
				_	
1		contribute to an understanding of the situation with	1		I wasn't at the time.
2	•	regard to BA pulling out of the programme.	2	Q.	Did you share the kinds of concerns that we have seen in
3	Q.	Do you think it wasn't taken seriously enough for that	3		this Project Mentors report about the system?
4		reason?	4	А.	It would have been discussed, definitely.
E	•	I think it's not right to solv it weap't taken coriovaly	E	•	
5	Α.	I think it's not right to say it wasn't taken seriously,	5	Q.	Certainly from the evidence that we have heard, it looks
6	А.	but I think there was a different angle of viewing it	6	Q.	like both Post Office Counters Limited and Pathway had
6 7	А.	but I think there was a different angle of viewing it than just simply: this is a report that's been produced	6 7	Q.	like both Post Office Counters Limited and Pathway had serious concerns about EPOSS at that stage. Were those
6 7 8		but I think there was a different angle of viewing it than just simply: this is a report that's been produced by Project Mentors.	6 7 8		like both Post Office Counters Limited and Pathway had serious concerns about EPOSS at that stage. Were those concerns shared with one another?
6 7 8 9		but I think there was a different angle of viewing it than just simply: this is a report that's been produced by Project Mentors. I mean, the concerns raised about EPOSS, for example,	6 7 8 9		like both Post Office Counters Limited and Pathway had serious concerns about EPOSS at that stage. Were those concerns shared with one another? There would certainly have been discussion about EPOSS
6 7 8 9 10		but I think there was a different angle of viewing it than just simply: this is a report that's been produced by Project Mentors. I mean, the concerns raised about EPOSS, for example, were consistent with those raised in 1997, for example,	6 7 8 9 10	А.	like both Post Office Counters Limited and Pathway had serious concerns about EPOSS at that stage. Were those concerns shared with one another? There would certainly have been discussion about EPOSS and what was going on and what needed to be done.
6 7 8 9 10 11	Q.	but I think there was a different angle of viewing it than just simply: this is a report that's been produced by Project Mentors. I mean, the concerns raised about EPOSS, for example, were consistent with those raised in 1997, for example, weren't they?	6 7 8 9 10 11	А.	like both Post Office Counters Limited and Pathway had serious concerns about EPOSS at that stage. Were those concerns shared with one another? There would certainly have been discussion about EPOSS and what was going on and what needed to be done. Do you think that the two organisations were being open
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6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. A. Q. Q. A. Q.	<ul> <li>but I think there was a different angle of viewing it than just simply: this is a report that's been produced by Project Mentors.</li> <li>I mean, the concerns raised about EPOSS, for example, were consistent with those raised in 1997, for example, weren't they?</li> <li>Yes.</li> <li>So there are certainly consistencies with I was unaware there was an earlier Project Mentors report and I was unaware of this featuring strongly in that, in that report.</li> <li>But the concerns about EPOSS were consistent, for example, with concerns raised at the Counter Automation Steering Group on 27 March 1998 that we have already looked at?</li> <li>Yes.</li> <li>Do you agree with that?</li> <li>Yes.</li> </ul>	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	А. Q. А. Q.	<ul> <li>like both Post Office Counters Limited and Pathway had serious concerns about EPOSS at that stage. Were those concerns shared with one another?</li> <li>There would certainly have been discussion about EPOSS and what was going on and what needed to be done.</li> <li>Do you think that the two organisations were being open with one another at that stage?</li> <li>There was a document that I may already have alluded to that was discussed yesterday morning about which was an ICL Pathway internal document, which I was personally unaware of, and was, in my view, a very significant document.</li> <li>You may not be able to give us the title of that document, but can you tell us, in particular, what information was significant to you?</li> <li>What was significant was the degree of from within ICL Pathway was the degree of discussion and going into details about how the thing had been produced from</li> </ul>
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A. Q. Q. A. Q.	<ul> <li>but I think there was a different angle of viewing it than just simply: this is a report that's been produced by Project Mentors.</li> <li>I mean, the concerns raised about EPOSS, for example, were consistent with those raised in 1997, for example, weren't they?</li> <li>Yes.</li> <li>So there are certainly consistencies with I was unaware there was an earlier Project Mentors report and I was unaware of this featuring strongly in that, in that report.</li> <li>But the concerns about EPOSS were consistent, for example, with concerns raised at the Counter Automation Steering Group on 27 March 1998 that we have already looked at?</li> <li>Yes.</li> <li>Do you agree with that?</li> <li>Yes.</li> </ul>	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	А. Q. А. Q.	like both Post Office Counters Limited and Pathway had serious concerns about EPOSS at that stage. Were those concerns shared with one another? There would certainly have been discussion about EPOSS and what was going on and what needed to be done. Do you think that the two organisations were being open with one another at that stage? There was a document that I may already have alluded to that was discussed yesterday morning about which was an ICL Pathway internal document, which I was personally unaware of, and was, in my view, a very significant document. You may not be able to give us the title of that document, but can you tell us, in particular, what information was significant to you? What was significant was the degree of from within ICL Pathway was the degree of discussion and going

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1	Q.	Might that have been the report that was produced by Jan
2		Holmes and Mr McDonnell, which, towards the end,
3		I think, was very critical of, for example, the way the
4		code was built?
5	Α.	Yes.
6	Q.	Thank you. Do you think that ICL was being honest with
7		the Post Office at this stage?
8	Α.	I don't know to what extent the sort of very honest
9		appraisal of what had happened in EPOSS was being shared
10	-	with the Post Office.
11	Q.	
12		straight to page 37, because it's a packet of documents,
13		so a lot of the pages are not relevant. This is
14		a letter from yourself to Mike Coombs at ICL on
15		17 August 1998 and it encloses a document which is over
16 17		the page. Do you remember this at all?
17		( <b>Pause</b> ) Perhaps I will read from the
10 19	А.	No. sorry, I'm reading it because I'm not that familiar
20	А.	with it.
20	Q.	I will read it for the purpose of the record as well,
22	હ.	the first half of that first paragraph. It says:
23		"The Sponsors wish to make clear that the approach
24		they have proposed in the Replan takes into account
25		Pathway's previous track record, for example in terms of
		33
1	Δ	No. I mean I was representing RA's honest views at
1 2	А.	No. I mean, I was representing BA's honest views at that time.
1 2 3		that time.
2	A. Q. A.	that time. At that time, did you have faith in ICL's performance?
2 3	Q.	that time.
2 3 4	Q. A.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last?
2 3 4 5	Q. A. Q.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last? Which state of affairs? I'm sorry.
2 3 4 5 6	Q. A. Q.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last?
2 3 4 5 6 7	Q. A. Q.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last? Which state of affairs? I'm sorry. The confrontation between the two parties of this
2 3 4 5 6 7 8	Q. A. Q. Q.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last? Which state of affairs? I'm sorry. The confrontation between the two parties of this nature.
2 3 4 5 6 7 8 9	Q. A. Q. Q.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last? Which state of affairs? I'm sorry. The confrontation between the two parties of this nature. If I remember correctly, at this stage, we were trying
2 4 5 6 7 8 9	Q. A. Q. Q.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last? Which state of affairs? I'm sorry. The confrontation between the two parties of this nature. If I remember correctly, at this stage, we were trying to work a lot more closely and a lot more constructively
2 4 5 6 7 8 9 10 11	Q. A. Q. Q.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last? Which state of affairs? I'm sorry. The confrontation between the two parties of this nature. If I remember correctly, at this stage, we were trying to work a lot more closely and a lot more constructively with ICL Pathway and there's some reference, I believe,
2 3 4 5 6 7 8 9 10 11 12	Q. A. Q. Q.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last? Which state of affairs? I'm sorry. The confrontation between the two parties of this nature. If I remember correctly, at this stage, we were trying to work a lot more closely and a lot more constructively with ICL Pathway and there's some reference, I believe, to that in some of this correspondence, so we were
2 3 4 5 6 7 8 9 10 11 12 13	Q. A. Q. Q.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last? Which state of affairs? I'm sorry. The confrontation between the two parties of this nature. If I remember correctly, at this stage, we were trying to work a lot more closely and a lot more constructively with ICL Pathway and there's some reference, I believe, to that in some of this correspondence, so we were deliberately trying not to have I hesitate to use the
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. A. Q. Q.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last? Which state of affairs? I'm sorry. The confrontation between the two parties of this nature. If I remember correctly, at this stage, we were trying to work a lot more closely and a lot more constructively with ICL Pathway and there's some reference, I believe, to that in some of this correspondence, so we were deliberately trying not to have I hesitate to use the term "Punch and Judy", but, you know, there was a degree
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. A. Q. Q.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last? Which state of affairs? I'm sorry. The confrontation between the two parties of this nature. If I remember correctly, at this stage, we were trying to work a lot more closely and a lot more constructively with ICL Pathway and there's some reference, I believe, to that in some of this correspondence, so we were deliberately trying not to have I hesitate to use the term "Punch and Judy", but, you know, there was a degree at some times, in the early parts of this programme, of that and we were trying to say "We really need to work
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A. Q. Q. A.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last? Which state of affairs? I'm sorry. The confrontation between the two parties of this nature. If I remember correctly, at this stage, we were trying to work a lot more closely and a lot more constructively with ICL Pathway and there's some reference, I believe, to that in some of this correspondence, so we were deliberately trying not to have I hesitate to use the term "Punch and Judy", but, you know, there was a degree at some times, in the early parts of this programme, of that and we were trying to say "We really need to work with the ICL Pathway, we need to get close to them and closer to them to understand what is going on". I think in a document we saw just a few moments ago, there was some concern about the sharing of information
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A. Q. Q. A.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last? Which state of affairs? I'm sorry. The confrontation between the two parties of this nature. If I remember correctly, at this stage, we were trying to work a lot more closely and a lot more constructively with ICL Pathway and there's some reference, I believe, to that in some of this correspondence, so we were deliberately trying not to have I hesitate to use the term "Punch and Judy", but, you know, there was a degree at some times, in the early parts of this programme, of that and we were trying to say "We really need to work with the ICL Pathway, we need to get close to them and closer to them to understand what is going on". I think in a document we saw just a few moments ago, there was some concern about the sharing of information there or a lack of sharing of information from ICL. Do
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. A. Q. A. Q.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last? Which state of affairs? I'm sorry. The confrontation between the two parties of this nature. If I remember correctly, at this stage, we were trying to work a lot more closely and a lot more constructively with ICL Pathway and there's some reference, I believe, to that in some of this correspondence, so we were deliberately trying not to have I hesitate to use the term "Punch and Judy", but, you know, there was a degree at some times, in the early parts of this programme, of that and we were trying to say "We really need to work with the ICL Pathway, we need to get close to them and closer to them to understand what is going on". I think in a document we saw just a few moments ago, there was some concern about the sharing of information there or a lack of sharing of information from ICL. Do you agree with that at around that time? Yes. I mean, remember that we are still in the PFI era here and remember I have certainly heard, over the past
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. A. Q. A. Q.	that time. At that time, did you have faith in ICL's performance? I had concerns about ICL's performance. How long did this state of affairs last? Which state of affairs? I'm sorry. The confrontation between the two parties of this nature. If I remember correctly, at this stage, we were trying to work a lot more closely and a lot more constructively with ICL Pathway and there's some reference, I believe, to that in some of this correspondence, so we were deliberately trying not to have I hesitate to use the term "Punch and Judy", but, you know, there was a degree at some times, in the early parts of this programme, of that and we were trying to say "We really need to work with the ICL Pathway, we need to get close to them and closer to them to understand what is going on". I think in a document we saw just a few moments ago, there was some concern about the sharing of information there or a lack of sharing of information from ICL. Do you agree with that at around that time? Yes. I mean, remember that we are still in the PFI era

1		failure to meet planned dates, and in particular the
2		5th October 1998 software delivery date for Nile Release
3		2.0 despite all milestones having been hit or on target
4		for delivery of components from CAPS."
5		It looks as though it is being critical of ICL's
6	_	track record.
7	Α.	I think it was. I
8	Q.	In fact, we can see a response from ICL at page 45 of
9		the same document, it's a response from Tony Oppenheim
10		and dated 18 September and it begins, in the second
11		paragraph:
12		"We were surprised and disappointed at the
13		aggressive tone of the letter and by the number of
14 15		gratuitous and unjustified allegations of fault on the
15 16		part of ICL Pathway."
17	А.	Do you remember I sorry, I remember having read the documentation.
18	А. Q.	
10	ч.	Yes. We see quite a lot of letters in this period marked as "Without Prejudice". Was there distrust
20		between the parties?
20	А.	No, but there was a behind-the-scenes level of legal
22	-Ω.	activity going on with regard to the possibility of
23		whether this contract would continue.
24	Q.	I mean, reference to "aggressive tone", was there some
25	ч.	hostility between the two parties?
20		34
1		ICL Pathway reacted to others, particularly the Benefits
2		Agency, trying to get close to the precise nature of the
3		solution. And there was a feeling in BA that they
4		needed to because of the nature of the product, and
5		I think there was a feeling in ICL Pathway that BA,
6		having defined what they wanted, should let ICL Pathway
7		go and provide it under PFI rules.
8	Q.	Can we move to the spring of 1999 and look at
9		POL00028370. This is a meeting of the Horizon
10		management team and at page 3 are the actions from
11		an earlier meeting of 3 March 1999. You are the top
12		attendee there. Does that mean were you the chair at
13		that stage of the Horizon management team?
14	Α.	Yes.
15	Q.	Can we go to page 6, please, and that is the agenda for
16		a meeting on 10 March 1999 and you are listed there as
17		chair, and the "Purpose" is:
18		"To ensure the HORIZON Programme is fully scoped,
19		planned and managed to deliver in all areas. To monitor
20		the delivery of HORIZON within the agreed Programme
21		timescales and ensure that issues are resolved and risks
22		are managed."
23		At the bottom of the page:
24		"For this meeting, the emphasis is on ensuring
25		action is being taken to manage the key issues and risks
		36

(9) Pages 33 - 36

1		and agreeing those that should be escalated to the next	1	Q.	Yes, and let's look on the right-hand side, red, amber
2		Horizon and CAPS and Cards Programme Boards."	2		green status: red. So this is seen as a serious issue?
3		Can we look at page 7, please. There, if you look	3	Α.	Yes.
4		at the top of the page, those are what are called	4	Q.	There were various actions there. Can we look perhaps
5		"Horizon Programme Significant Issues" and then, over to	5		at the second one:
6		page 9, we have there "Programme Risk Status Report,	6		"Mike Coombs pressed (by DWM)"
7		Most Significant Risks", and I'm going to take you to	7		Are you "DWM" there?
8		the top box, so that's number 5. It says there:	8	Α.	l am.
9		"Due to a lack of adequate visibility of the	9		" to respond to earlier letters regarding the need
10		ICL Pathway design, and the lack of support from the	10		for ICL Pathway to cooperate
11		contract to leverage this visibility, we have been	11		" No risk reduction possible whilst ICL Pathway
12		unable to gain a high level of assurance in the adequacy	12		continues to use the terms and conditions of the
13		or suitability of the service to support the POCL	13		contract to deny Horizon access to the information
14		business. POCL therefore risks the implementation of	14		necessary for technical assurance of NR2."
15		a service in Live Trial and beyond which will have	15		And you are listed there as the person who is
16		negative operational impacts, resulting either in	16		responsible for action there. Is it the case that in
17		a level of service degradation or delay to the start of	17		' March 1999 POCL was concerned that it didn't have enough
18		National Rollout."	18		information to adequately address the adequacy or
19		So "Due to a lack of adequate visibility", that,	19		suitability of Horizon?
20		again, implies that there was some lack of sharing of	20	Α.	I think it was. I'm clearly going by the written record
21		information; is that your recollection or not?	21		before me, yes.
22	Α.	I think this refers back to the problem that I was	22	Q.	Let's stay in the same month and look at POL00028419.
23		talking about a minute ago, which is ICL Pathway were	23		This is an "End to End Testing" report. Can we look at
24		still saying this is a PFI contract and that was	24		the second page. You are listed there in about the
25		a continual problem I think.	25		middle of the page, "Dave Miller Horizon" you were
		37			38
1		a recipient do you remember receiving this kind of	1		either move forward, or to improve the quality of the
2		document, even if you don't remember the specific one?	2		test results, ie the incorrect cash account mapping for
3	Δ	I certainly received documents of this kind.	3		a stock item would have caused misbalancing Cash
4		Can we look at page 6, please. It is the second	4		Accounts in all offices."
5		paragraph there:	5		Can we scroll down. There are conclusions there and
6		"The final pass of End to End was the culmination of	6		it says, for example:
7		earlier passes, which achieved their test objectives to	7		"The ability to maintain day for day running was
8		an extent. However, throughout the earlier passes some	8		achieved by careful management and communication between
9		areas of functionality were not available in the build	9		all parties."
10		being used for the test, and other areas fell short of	10		Then, at the bottom it says, the final sentence:
11		the expected functionality."	11		"Outstanding incidents are under discussion for
12		Slightly lower down on this page, it says:	12		inclusion on the Known Problem Register"
13		"Lessons learnt from previous passes of End to End	13		Is a fair reading of those points that I have just
14		were implemented prior to the commencement of the final	14		taken you to that earlier tests had fallen short of
15		pass. These were"	15		their expected functionality? I think that was page 6,
16		The first one there:	16		sorry, the page before. It's that part beginning "The
17		"A reduction in the volume of transactions entered	17		final pass", really, and there's reference on that page
18		onto the Horizon counter throughout the cycle."	18		then to carefully managing testing, such as
19		Can we look over the page, please, thank you very	19		Sorry, can we go one page back. Thank you:
20		much. The first major paragraph there:	20		"A reduction in the volume of transactions entered
21		"Throughout the final pass issues were identified by	21		onto the Horizon counter throughout the cycle."
22		all parties. Some issues were remedied and retested	22		Do you remember that? It appears to be some sort of
23		within the cycle, ie POCL reference data drop to change	23		need to quite carefully manage the testing at that
24		the Cash Account type from London to Provincial. It was	24		stage?
25		necessary to apply fixes to the counter environment to	25	•	I think I'm sorry, I don't recall this level of

(10) Pages 37 - 40

1	-	detail.	1
2	Q.	Do you perhaps if we can over the page, again, to	2
3		that paragraph that started "Throughout", that's the	3
4		first major paragraph. Do you remember it's the	4
5		final sentence there some issues with cash accounts	5
6		that needed fixes, for example?	6
7	Α.	I mean, I was aware of issues with cash accounts at this	7
8	•	time, yes.	8
9	Q.	5	9
10		the very bottom of that page, it's that there are	10
11		outstanding incidents which need to be included on	11
12 13		a known problem register.	12 13
13 14		Can I just ask you, in that paragraph sorry, if we go slightly up again to "Throughout" I don't know	13
14		the answer to this at all, it says "apply fixes to the	14
16		counter environment"; do you know what that meant at	15
17		all?	10
18	Α.	l could think of a few things it could well mean but I'm	18
19	А.	afraid I can't give you a definitive answer to that.	10
20	Q.	Did you see misbalancing cash accounts as a serious	20
20 21	ч.	issue at that stage?	20
22	Α.	Yes, it was an issue that was being dealt with.	21
23		BLAKE: I have quite a few more questions on this	22
24		particular topic. This might be, sir, a convenient	23
25		moment for a break for as long as you would like, 10 or	25
20		41	20
1		which you joined the meeting, so there, just below	1
1 2		question 9, it says:	2
2		"Mr Sweetman & Mr Miller joined the meeting."	3
4		Do you remember that meeting?	4
5	A.	I don't have a very good recollection of it but I have	5
6	<b>~</b> .	read this document and I'm reasonably content with what	6
7		I see there.	7
8	Q.	Page 9 of this document, please. There are plenty of	8
9	ч.	issues that seem to have been covered by Mr Sweetman,	9
10		but page 9 is the significant part where your name is	10
11		mentioned. I'm going to read those three paragraphs for	10
12		the purposes of the record. It says:	12
13		"Mr Miller further explained that they were in the	13
14		process of a 'live trial' running the software in	10
15		300 offices. If that was done successfully by the end	15
16		of July they would be looking to start the national	16
17		rollout in the third week in August. This would be	17
18		built up at a relatively low rate to Christmas, when	18
19		they would review how the offices on the system were	10
20		working. It was probable that there would be around	20
21		2,000 offices operation by Christmas and it was	20
22		estimated that by around 10th January 2000 they would	22
23		start the rollout at the full rate of"	23
24		It says "£300", it must be "300 per week":	20
25		"Present indications were that this timescale to be	25
		43	

	15 minutes?
SIR	WYN WILLIAMS: Yes, okay. Well, by that clock, it's
	about 12 minutes past, isn't it. So can we start at
	25 past, is that all right?
MR	BLAKE: Absolutely. Thank you very much.
SIR	WYN WILLIAMS: Thank you.
(11	.12 am)
	(Short Break)
(11	.26 am)
MR	BLAKE: Mr Miller, before the break we were going over
	concerns with EPOSS, Project Mentors' concerns,
	visibility issues, cash account issues and that was
	1997/1998 and we're into 1999 now.
	Can we go to NSFP000084, please. This is a report
	of the special meeting of the national executive council
	of the NFSP on 11 June 1999. Can we go over the page,
	please. The second substantive paragraph there, you're
	not listed as present, although you clearly were,
	present because it says:
	"Executive council members had submitted questions
	which they wanted to be put to Mr Sweetman and
	Mr Miller."
	I think you came in halfway through that meeting.
A.	That's correct, yes.
Q.	Can we look at page 6, please, and that's the point at
	42
	achieved.
	"Mr Butlin"
	Who was Mr Butlin, do you remember?
Α.	· · · · · · · · · · · · · · · ·
	National Federation of SubPostmasters in the South West
	and he was a subpostmaster in Torquay.
Q.	Thank you:
	"Mr Butlin referred to the serious problems that the
	South West was having with the software, especially with
	the balance, and asked Mr Miller whether any changes
	were to be made in that respect. An assurance was
	sought by the Committee that the balance would become
	more user-friendly, more logical and easier for
	subpostmasters to use. Would it be possible for
	subpostmasters to use. Would it be possible for subpostmasters to have more input into the way the
	balance was done. The North East was facing similar

problems, subpostmasters were incurring additional staff costs, an example being around £350 in the four weeks

"Mr Miller acknowledged that there was a problem and said that there would be a software change to improve the situation. If there were serious problems that could not be overcome in the timescale the rollout would

So what's going on there is subpostmasters seem to \$44\$

that his office had been up and running.

be delayed."

(11) Pages 41 - 44

1		be experiencing issues including balancing problems. Do	1
2		you agree with that?	2
3	Α.	Yes, I think Alan was particularly concerned about the	3
4		time it was taking to balance and I think there was	4
5		an issue of, because it was taking longer time to	5
6		balance, they felt they ought to be given some money to	6
7		support that.	7
8	Q.	But on the second line of that second paragraph from	8
9		Mr Butlin, it does seem to include some problems with	9
10		the software and I think your response acknowledged that	10
11		there was going to be changes to the software. Were you	11
12		aware, at that stage, that the subpostmasters were	12
13		experiencing software problems?	13
14	Α.	At the time I simply cannot remember but it does say	14
15		that here.	15
16	Q.	Part of your response was that if there were serious	16
17		problems that could not be overcome in the timescale,	17
18		the rollout would be delayed?	18
19	Α.	Yes.	19
20	Q.	Yes. Then if we scroll down, more questions in this	20
21		document were answered by Mr Sweetman, but this	21
22		particular one was answered by you. Was that because	22
23		you were the technical representative, between the two	23
24		of you at that meeting, or because you were more hands	24
25		on with the Horizon project or?	25
		45	
1		already running an automated system. Seven sheets of	1
2		comments from the North East had been passed to Mr Dave	2
2		Miller. The difficulties and trauma being experienced	3
4		by some subpostmasters were giving rise to concerns for	3 4
5		their health and emotional wellbeing. It was felt by	5
6		some that a tragedy was not far away if something was	6
7		not altered soon. The software was considered to be	7
8		poor quality and not intended to run such a huge	8
9		network. The system is based on ECCO which was	9
10		originally written for a network of 700 not 15,500.	10
11		"Although there may be improvements to the general	11
12		system, most members present wanted to know if the	12
13		committee had the power to say that the current system	13
14		is obviously not working and instruct ICL and the Post	14
15		Office to review or restart with more 'subpostmaster	15
16		friendly' software."	16
17		So, at that stage, at that meeting I appreciate	17
18		you weren't present but it appears as though serious	18
19		problems were being raised by subpostmasters about	19
20		software issues; would you agree with that?	20
21	Α.	Yes, and I personally attended a meeting in the North	21
22		East a large number of subpostmasters.	22
23	Q.	Do you remember receiving those seven sheets of	23

- 23 Q. Do you remember receiving those seven sheets of24 comments?
- 25 **A.** Well, I think actually one of my members of staff was at 47

Α.	Yes, and I think also because Alan was known to me,
	I think.

Q. At that stage, given the evidence that you have already given today, you would have been aware of, for example, the concerns about EPOSS that we have already discussed. Do you agree with that?
A. Yes.

8	Q.	Can we go to another NFSP meeting, this time on 21 to
9		23 June 1999 and that's POL00028471, please. Thank you
10		very much. This is a meeting of the national executive
11		council on those three days.
12		I don't think you attended this particular meeting
13		but you're mentioned in it and that's why I'm going to
14		take you to the relevant pages, and it is page 15,
15		please. Thank you very much.
16		So these are the minutes, or this is the report of
17		the meeting and it's at page 22 where there's discussion
18		of counter automation. It's the bottom of the page.
19		It's at 9(c) where there is discussion of counter
20		automation begins and can we go over the page, please,
21		and it's the bottom half of page 23 that I would like to
22		look at. Again, I'm going to read the relevant passages
23		for the transcript. It says:
24		"There was general discussion on the severe

24	"There was general discussion on the severe
25	difficulties being experienced by subpostmasters who are
	46

1		the meeting with me in Newcastle and produced that
2		document.
3	Q.	Does that passage reflect the kinds of concerns that you
4		heard at your meeting?
5	Α.	Well, that meeting was a very lively meeting. It was
6		held at Newcastle Rugby Club. It there was a recital
7		of concerns and problems, quite genuinely from the
8		subpostmasters and, towards the end of the meeting,
9		I actually said "If any subpostmaster here does not want
10		this in their offices, if they can't cope with it or
11		whatever, please say so and it will be removed in the
12		next fortnight". There was one person in the room, one
13		subpostmaster who said they wanted the equipment
14		removed.
15	Q.	Reference here to concerns about their health and
16		emotional wellbeing at this stage, in the summer of
17		1999. Presumably, it wasn't an all or nothing. They
18		could have had an improved version, couldn't they?
19	Α.	Well, I mean, there was a huge amount of work going on
20		on the products to try and get them into shape, so
21		I think that was a given.
22		What I was trying to find out, given the words you
23		have quoted to me here, is whether it was as extreme as
24		it may appear here and I'm only saying that, when given
25		the opportunity not to have the equipment in the office, 48

1		only one subpostmaster took up that option.	1	
2	Q.	Would you accept that, from the information that you	2	
3		were told, you were aware that there were, nevertheless,	3	
4		significant concerns with the existing system?	4	
5	Α.	5	5	
6		it. It was a new system just, if you remind me, is	6	
7		the date of this	7	
8	Q.		8	Α.
9	Α.	Yes, and they had also just been told, remember, that	9	Q.
10		the BA product was not going to be there and available	10	Α.
11	•	for them.	11	
12	Q.	In fact, one attendee makes very much that point. Can	12	•
13		we go over the page to page 24, please. It is	13	Q.
14		Mr Jannetta. Do you know Mr Jannetta at all?	14	
15	A.	l don't.	15	
16 17	Q.	So:	16 17	
		"Mr Jannetta said that he and others of his		
18 19		colleagues would have to rely on those subpostmasters in the North East and South West who currently have this	18 19	
		system in place, to make sure their voices are heard		
20 21		with their problems and to ensure that all the	20 21	
21		difficulties encountered are satisfactorily overcome.	21	
22		The point must clearly be made to the Business that this	22	
23		automation is not going to do the job, that	23	A.
25		subpostmasters have learned enough to know that it will	25	Α.
20		49	20	
1		ICL Pathway to improve these systems, so that was going	1	
2		on all the time, constantly, and so, in response to	2	
3		part of your question, the thing was being improved, as	3	
4		far as I was concerned.	4	
5	Q.	The next passage:	5	
6	·	"The General Secretary assured the meeting that	6	
7		Mr David Miller had been informed of the difficulties in	7	
8		no uncertain terms. Mr Butlin said we must insist	8	Q.
9		access to ICL Pathway so that we can tell them what we	9	ч.
10		would like to see. It is not difficult and does not	10	Α.
11		take long to rewrite software. The problems must be	11	Q.
12		resolved with Pathway and they must sort it out with	12	
13		POCL. We cannot continue to have experienced	13	
14		subpostmasters/mistresses in distress on the telephone.	14	Α.
15		struggling until all hours to balance. These situations	15	
16		must not be permitted to arise. It was pointed out that	16	
17		if the Lottery offices had to deal with this situation	17	
18		it would not be tolerated."	18	
		Can I just with reference to Mr Butlin, he was	19	
19	Α.			
19 20	А.	concerned, and because I knew him, I made a special	20	
	Α.	concerned, and because I knew him, I made a special point of keeping in touch with him, to the point where	20 21	
20	A.			Q.
20 21	Α.	point of keeping in touch with him, to the point where	21	Q.
20 21 22	Α.	point of keeping in touch with him, to the point where he had it installed, we had a conversation about his	21 22	Q. A.
20 21 22 23	Α.	point of keeping in touch with him, to the point where he had it installed, we had a conversation about his experience there. When he did his first balance and we	21 22 23	

	Were you aware of something called the Richard
	Jackson automated system?
Α.	l believe so, yes.
Q.	Is that an alternative system of some
Α.	I think it was something that some a few
	subpostmasters were interested in, maybe commercially,
	but I couldn't substantiate that.
Q.	So:
	"The Richard Jackson automated system was considered
	by both Mr Marshall and Mr Darvill to be an easier to
	use, preferable, alternative to the present system.
	Mr Darvill wanted to know if the lawyers had some hold
	on the Horizon system for some reason, that it could not
	be changed."
	Just pausing there, you have said that you offered
	them "system or no system"; did you, at any stage in
	this period, offer them an improved system, a different
	system?
Α.	Sorry, what I meant to convey was that, besides what is
	said here, we were working hard on the programme with
	50
	that, in fact, the system was speeding up his balance
	and that he was content with it.
	Now, that's a you know, not a documented
	conversation but, as I say, Alan was known to me very
	well, I visited his office on two or three occasions and
	I was concerned to maintain contact to see how things
	were going.
Q.	The feedback that's being revealed there, though, isn't
	just about his personal experience, is it?
Α.	No, no, it's not. I agree.
Q.	Yes. Did the general secretary I think that's Colin
	Baker at that time did he inform you "in no uncertain
	terms" as it says there?
Α.	He was certainly expressing concerns through the piece,
	so whatever his members were saying to him would be fed
	back to me.
	This is, of course, a report of a general debate at
	this meeting, an internal debate in the National
	Federation of SubPostmasters, and I can't I was just
	aware of fairly continuous feedback from the NFSP,
	negative and positive, throughout this piece.
Q.	I'm not sure we can see positive feedback in this
	particular
Α.	No, I agree, I'm sorry, I wasn't suggesting that .
Q.	Knowing what we know happened to subpostmasters, would
	52

not work satisfactorily and that it must not be rolled out to an excess of [15,000] sub post offices until all

"The Richard Jackson automated system ..."

the problems had been overcome."

It says:

(13) Pages 49 - 52

1		you accept that this kind of information is highly	1		to retender and to have a system that was, as it were,
2		relevant information?	2		direct for POCL, not one that had been adopted from the
3	Α.	Yes, I do.	3		BA/POCL routes.
4	Q.	The next page, Miss Lindon do you know Miss Lindon at	4	Q.	Do you think the suggestion that's being made here might
5		all?	5		have been a sensible suggestion?
6	Α.	I'm not sure I do.	6	Α.	Well, I think we we looked in various parts of the
7	Q.	Miss Lindon makes some comments, and it's the second	7		business, when BA unilaterally pulled out, about going
8		half of that, it says:	8		forward and, certainly, the advice I was getting was "We
9		"Pointing out that it is now three years since the	9		need to go forward, and ICL Pathway, because they're
10		project was first mooted, which is a very long time in	10		there and they have a large degree of experience, are
11		the technological world, she suggested that a different	11		still the best option".
12		system be tried, smaller and less complicated, which	12	Q.	The final paragraph on the page, currently:
13		would be of greater benefit to the smaller offices and	13		"As no one appeared to be listening to, or acting
14		probably be a good deal cheaper and easier to operate.	14		upon, the problems being experienced by subpostmasters,
15		POCL seem to be attempting to build an audit system into	15		Mr Ingham suggested the Federation take the bull by the
16		the project, making the whole thing far too big, too	16		horns and write to whoever is Bruce McNiven's
17		cumbersome and too complicated."	17		senior"
18		Was that a view that you were aware of at the time,	18		Who was Bruce McNiven's senior?
19		not necessarily from this particular	19	Α.	Me.
20	Α.	I wasn't aware of this particular view, no.	20	Q.	" stating that we have lost confidence in the system.
21	Q.	Not from that individual, but were you aware of views	21		The national president confirmed that this provide test
22		that a simpler system could be adopted if the Benefits	22		had already been made to David Miller and we must now
23		Agency project was not going to be going ahead?	23		wait to see what they come back with."
24	Α.	There was an option, which was to say "Stop all work on	24		Can we keep on scrolling
25		what's going on in this contract", and to redefine and 53	25	Α.	Sorry, could I comment on that? 54
1		Absolutely.	1		Baker, it's dated 22 June, so actually it seems to have
2	Α.	I was never aware of a communication from the	2		been at least sent during that meeting of the NFSP. Do
3		National Federation, a formal communication or informal,	3		you remember that at all?
4		that said they had lost confidence in the system.	4		I remember writing to Colin.
5	Q.	I will very shortly take you to correspondence between	5	Q.	
6		yourself and the NFSP.	6		talks about the meetings:
7	Α.	Okay, all right.	7		"Through these meetings we were able to identify the
8	Q.	Let's just finish with this document by reading that	8		same items that you have raised and these are now all in
9		final passage that's on the screen:	9		the process of being dealt with through our negotiations
10		"Mr Peberdy thanked the Council for their	10		with ICL Pathway. However, it is also the case that we
11		information. These were exactly the problems expressed	11		have some very tight timescales in which to convert the
12		to Dave Miller at their meeting on 11th June. The	12		Heads of Agreement drawn up by the Treasury and the DTI
13		National President had taken 7 pages of faults and other	13		into a revised contract structure. Unfortunately, our
14		things the Federation knew to be wrong, including the	14		room for manoeuvre has been constrained and we are
15		fact that some faults dated back to January 18997, since	15		working extremely hard to ensure all the key issues are
16		when POCL have not addressed the problems, only been	16		identified as part of the acceptance process."
17		fire-fighting. Clearly we cannot accept something which	17		Now, something we discussed at the very beginning of
18		keeps people at work until after 10.00 pm at night."	18		today was tight timescales, time pressures. A that
19		Do you remember those conversations with Mr Baker?	19		point in time, June 1999, were you feeling some time
20	Α.	I know they reflected to me there was concern from their	20		pressure to get on with the system?
21	_	members about how long it was taking to balance.	21		Absolutely.
22	Q.	Can we go to NFSP00000073, please. This is the	22	Q.	Now, the explanation starts by talking about surveys.
23		correspondence that I mentioned.	23		Could we scroll over the page, please. Thank you very
24		Now, this covering letter is dated 24 June but, if	24		much. "Modifications" I want to look at "Training".
25		we go over the page, it's a letter from you to Colin 55	25		It says there: 56

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				uny	
1		"Training	1		own resource supporting subpostmasters during this
2		"This is probably our greatest area of concern and	2		process. So I think we were pressuring Pathway but we
3		is being pursued vigorously with ICL Pathway. The areas	3		were also prepared to put our hand in our pocket to
4		you have identified such as balancing and cash account	4		actually support subpostmasters through the early stages
5		are part of the redesign which is currently taking place	5		of this process.
6		and is based on subpostmasters experience."	6	Q.	I think hand in your pocket only to some extent because,
7		The next paragraph responds to a suggestion that	7		under the training, it said that you couldn't do
8		there be office-by-office training and the response	8		office-by-office training?
9		there is "we can't provide that because that is too	9	Α.	No, and I think that would have been prohibitively
10		expensive".	10		expensive.
11		Over the page, please, to "Balancing". It says:	11	Q.	Looking back at the first paragraph on the first page,
12		"Your concerns about printing, redeclaration of	12		so that's page 2 of this particular document, do you
13		stocks, the identification of First and Second Class	13		remember I took you to this paragraph where it mentions
14		stamps and postal orders are already in the process of	14		working up against tight timescales. Do you think it
15		resolution and a software drop in July will deal with	15		was convenient, at that stage, to be focusing on
16		them. However, there are issues around the balancing	16		training issues and for it to be seen as an issue with
17		process which are part of the training response and have	17		training because of the tight timescales?
18		yet to be satisfactorily addressed by Pathway. Clearly,	18	Α.	I think training was genuinely an issue at that time.
19		this is something on which we will base our decisions	19		But what we don't see in this document is an explanation
20		about acceptance and rollout".	20		such as "We're going to rewrite EPOSS", or any kind of
21		Now, it looks very much, by this stage and in this	21		software-type issues that we had previously been
22		correspondence, that by that time the blame had shifted	22		discussing and had been raised, for example, by
23		to focus on training issues. Do you agree with that?	23		subpostmasters.
24	Α.	I think there were training issues and we ploughed money	24		' I mean, earlier in June, for example, you seemed to
25		in I think we ploughed more money in and we had our 57	25		accept that balancing was a software issue. Do you 58
1		think the perception had abanged within POCL by this	1		amongst some individuals and we were trying to support
1 2		think the perception had changed within POCL, by this stage, and the focus had shifted to training?	2		that and get through that stage where then they then
2	^	I don't think the software issues had, in any way, gone	3		felt competent.
4	<b>-</b> .	away and they were still being worked on, but the	4	0	But do you accept that, at that stage, it wasn't just
5		pressure on to get the training right was very	5	α.	feelings of incompetence but feelings of stress and
6		strong, not just from the National Federation, but from	6		health concerns dealing with a system that wasn't
7		people within the programme.	7		working, rather than a person who couldn't work
8	0	I mean, let's look at page 4 of this document. It is	8		
9	Q.		9	•	a system? Judging by what I was was being fed to me and what
9 10		the final paragraph on page 4. It says: "I am keenly aware of the pressures and concerns	9 10	А.	I learned at Newcastle, I would say yes. I would also
10		experienced by the subpostmasters at the front end of	10		take you back to the question I asked them and the fact
12			12		that only one of them said "I don't want this system".
12		automation. Subpostmasters feelings of incompetence and	12		If I I asked that question in the real knowledge
		abandonment really do hit us hard and understanding	13		. 2
14		their experiences at first hand has been the single most			that, if a significant number of those people in the
15		important lesson we have all learned."	15		room had said "Take it out", that would have stopped me
16		Now, "feelings of incompetence" doesn't sound really	16 17	~	and the programme in my tracks.
17		like the kind of feelings we heard about being expressed		Q.	Well, would that be offering them the system or no
18		at that NFSP meeting. They sounded less of competence	18		system, rather than an improved system?
19		and more of concerns with the actual system. Do you	19	А.	Well, it was the system, I think I have said to you,
20		think things have shifted here to blaming	20		was being improved constantly. What I was trying to get
21		subpostmasters?	21		to was, if a significant number of people who had been
22	А.		22		taking part in the trial simply didn't want to do it,
23		an increasing understanding that the introduction of	23		didn't want the system, then that would have given me
24		this system into a population of very varied IT	24		a signal in one direction.
25		experience could provoke feelings of incompetence 59	25		The signal I got was that, whilst they were very 60

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1		conscious of being guinea pigs, of having had to work	1
2		hard, of having to put up with frustrations and all the	2
3		things associated with a live trial, that actually they	3
4	-	still thought it was worth carrying on with it.	4
5	Q.	Do you think the word "incompetence" there might be	5
6		problematic?	6
7	A.	On reflection, with the benefit of hindsight, possibly.	7
8	Q.	Because it wasn't just incompetence at that stage, or	8
9 10		even incompetence: there were significant problems with	9 10
10	A.	the software, weren't there? Yes, but the Federation were representing to me a	10
12	А.	what their members were feeling and the balance just	12
13		to go back, the balancing issue, at that time, was very	12
14		much one of how long is it taking us to do this and is	13
15		it going to improve the time that it takes us to do it,	15
16		or is it going to go on being a long time.	16
17	Q.		17
18		of those kinds of concerns that we have heard today that	18
19		were being expressed at those NFSP meetings?	19
20	Α.	You mean above me?	20
21	Q.	Yes.	21
22	Α.	I don't know, is the honest answer. That doesn't mean	22
23		to say I mean, Stewart and I discussed the programme	23
24		fairly frequently and I'm sure you will have the	24
25		opportunity to find that out.	25
		61	
1		"Implication on the Post Office of the 24 May 1999	1
2		Horizon Agreement" and you can see there it says	2
3		"PO99/79", so that's the second of those items.	3
4		Can we just have a look at what it says at the	4
5		bottom of that page. So those board minutes, in	5
6		relation to the implication on the Post Office of	6
7		24 May 1999 begin by saying:	7
8		"The Board has considered the Horizon contract in	8
9		detail"	9
10		Over the page please. It talks about an awayday	10
11		discussion. Do you remember the awayday discussion?	11
12	_	Were you present?	12
13	Α.	I'm not sure I was.	13
14	Q.	I think this took place in a is this the meeting in	14
15		the manor house in Gloucestershire? Do you remember	15
16		that at all?	16
17 19	Α.	I don't. I'm not in any way saying it didn't happen and	17
18 10		what's here is not a record of it, but I just don't remember it.	18 19
19 20	0		
20 21	Q.	"(ii) The Board had to decide by 31 July 1999 whether it wanted to terminate or sign the revised contract with	20 21
21 22		ICL for the automation of post offices. Key elements of	21
22		the new contract were"	22
23 24		For example:	23 24
24 25		"Electronic Point of Sale functionality, automated	24
		63	

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0	I don't know if you saw the evidence of John Roberts,
ч.	but he seemed to suggest, in his evidence, that there
	weren't significant complaints from the NFSP at this
	time. Do you think he was being kept sufficiently informed?
А.	Well, if that I don't recall that, but if that's what
A.	was being said then, clearly, that was not right.
Q.	Do you think it was well-known amongst those at POCL
٩.	that there were these kinds of complaints from members
	of the NFSP?
А.	
A.	issued on the matter, as far as I remember. I would
	certainly have communicated my experience in Newcastle
	to my colleagues on the programme.
Q.	So this is June 1999 and I want to take you to one month
٩.	later, 20 July 1999 and can we look at POL00000352
	please. This is the Post Office board meeting on
	20 July and you are listed there as "Others attending".
	I think you were attending for matters PO99/78 and 79.
	Do you remember that?
А.	I don't actually remember it but it is quite clear I was
	there.
Q.	
٩.	of Horizon begins and that's the PO99/78. Can we go
	over the page, please, at the bottom of this page 62
	payments, local feeder systems and Order Book Control Systems"
	Now, was this, therefore, a, if not the, key
	decision-making moment in respect of the Horizon
	programme?
А.	This was taking place on the please remind me, was it
7.	19 July?
Q.	20 July. In fact, it was an away weekend, so I think it
	was a weekend. But, anyway, these minutes are from
	20 July.
Α.	Whether it was "the", it was clearly "a" key decision
	point.
Q.	I think in May the heads of agreement had been signed
	but here the board are saying "We need to decide whether
	we want to terminate or sign a revised contract".
	I mean, that must have been a pretty significant moment
	in the life of the Horizon programme.
Α.	Yes.
Q.	Can we go over the page, please, and look at point (v):
	"System rollout was scheduled for 23 August 1999
	with acceptance needed by 18 August. There were three
	categories of acceptance each with a threshold which
	would determine whether or not rollout could proceed:
	high, medium and low.

"One incident within the high category, or more than 64

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1		20 incidents within the medium category, would result in	1		health and wellbeing of subpostmasters. What's your
2		the system not being accepted. Currently there were 270	2		view on this now then?
3		incidents of which 1 was high and 29 were medium. Of	3	Α.	That if that is if I went in there and said "David
4		greatest concern was the inadequate training of	4		Miller considered the system robust and fit for
5		employees although a new package had been produced and	5		service", that wasn't correct.
6		work on the other incidents was underway. At this stage	6	Q.	Do you remember, did the board question you on that at
7		it was expected that there would be no reason for not	7		all?
8		accepting the system by 18 August."	8	Α.	I'm sorry, and this is genuine, I have no recollection
9		Now, was your impression that those who attended	9		of this.
10		that meeting did or did not understand what an incident	10	Q.	If you made that statement do you regret it now?
11		was? We know they had read the contract.	11	Α.	If I made that statement, I do regret it.
12	Α.	I honestly don't know.	12	Q.	Let's look at what, in fact, unraveled after that
13	Q.	Now, looking at point (vi):	13		statement that it was "robust and fit for service" and
14		"Excluding the concerns over training, David Miller	14		then let's look at August 1999 and that's POL00028363.
15		considered the system robust and fit for service.	15		This is 10 August, so not long after, and I think there
16		"(vii) A number of subpostmasters were experiencing	16		is an email from Chris French. Who was Chris French, do
17		difficulties operating the system and in particular with	17		you remember?
18		balancing."	18	Α.	Chris French was a contractor. He ran a company called
19		Now, "robust and fit for service", that all sounds	19		French Thornton which advised various levels of the Post
20		quite different to all those documents that we have been	20		Office about IT and he was involved with the Horizon
21		looking at this morning; would you agree with that?	21		programme.
22	Α.	Yes, and I have read this document and I agree with you.	22	Q.	That's an email sent to you on 10 August:
23	Q.	This is only a month after the NFSP meeting	23		"From yesterday's wrap up meeting, you were
24	Α.		24		considering whether or not it was in POCL's
25	Q.	where concern was being raised about the trauma and	25		interests to declare to ICL Pathway that acceptance
		65			66
4		and a the sine of the	4		
1		could not be given on 16th."	1		"Therefore failure would require full retest do
2		We see there reference to Acceptance Incident 376.	2		we want this? Not in our interest to do everything
3	•	Do you remember that Acceptance Incident? I'm aware of it having gone through all the paperwork,	3		again.
4 5	А.		4 5		"Stability issue
6	0	yes. So that was high. It had not been retested	5 6		"Not an acceptable position "Root and branch review required 2 months but the
7	ч.	satisfactorily on time and the only plan seemed to be	7		solution is likely to be incremental."
8		a workaround. That seems to be the information that you	8		Can we go down, "Proposed approach". It says
9		are being given by Chris French.	9		there it is the third bullet point:
10		I'm going to go to another document that's two days	10		"Also we need assurance that problem will not
11		later, 12 August, it's POL00028362. This is a meeting	10		recur we need to be convinced that there is
12		of the Management Resolution it's a pre-meeting.	12		a solution that will allow monitoring of this
13		Were you involved in this at all or would you have	12		reconciliation and that there is a reporting that
14		been involved in this?	10		demonstrates it is satisfactory
15	A.		15		"External auditors say this problem could lead to
16	7.1	I don't know.	16		a qualification of the accounts although we do need
17	Q.	Let's have a look at the top. I think you presumably	17		to reach a financial estimate of the likely scale of
18		would have been aware of this information, that, by	18		errors."
19		12 August, there was a clear failure to meet conditions.	19		What's being said there, do you remember?
20		Acceptance Incident 298 was "Definite high". Acceptance	20	A.	
		Incident 376 was "high but may not be supported by	21		do to sort the issues out and the external auditor
21			- •		
21 22			22		problem, specifically, was that I think Stuart Sweetman
21 22 23		Copping given rectification plan".	22 23		problem, specifically, was that I think Stuart Sweetman and I agreed of exposure of these issues to our
22	A.	Copping given rectification plan". If we look at "KB" do you know who "KB" was?			problem, specifically, was that I think Stuart Sweetman and I agreed of exposure of these issues to our external auditors and I received, yesterday afternoon,
22 23	A. Q.	Copping given rectification plan". If we look at "KB" do you know who "KB" was? Keith Baines, the late Keith Baines.	23		and I agreed of exposure of these issues to our
22 23 24	_	Copping given rectification plan". If we look at "KB" do you know who "KB" was?	23 24		and I agreed of exposure of these issues to our external auditors and I received, yesterday afternoon,

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1		auditors aware that there could be issues and they told	1
2		us what would happen if these issues weren't sorted.	2
3	Q.	I'm going to take you to that letter in a moment. Let's	3
4		look at "Training issue" it says support was needed for	4
5		subpostmasters to produce their first balance.	5
6		Can we go over the page please, "View on NRO", so	6
7		that's the view on national rollout.	7
8	Α.	Yes.	8
9	Q.	It says:	9
10		"The steer from the Board is not to accept	10
11		a sub-standard system."	11
12		But surely, by that stage, you had already told the	12
13		board that the system was not substandard; would you	13
14		accept that?	14
15	Α.	Well, you quoted from the board comments. You didn't go	15
16		over the page where I believe there is some reference to	16
17		board members being aware that there were issues. Am	17
18	~	l right?	18
19 20	Q.	Well, I'm happy to look at that document again and	19
20 21		I think I know what you're talking about. Let's have	20 21
21		a quick look at POL00000352, and I think it's page 12 that you're talking about, which says:	21
22		"Members were concerned that a number of technical	22
23 24		issues remained unresolved and that the BA contract	23 24
25		position was still unclear."	24
20		69	25
1		a month earlier that it was "robust and fit for	1
1 2		a month earlier that it was "robust and fit for service"?	1 2
	А.	service"?	
2	А.		2
2 3	A. Q.	service"? I think I was the programme was concentrating on	2 3
2 3 4	_	service"? I think I was the programme was concentrating on sorting out the issues in front of us.	2 3 4
2 3 4 5	Q.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back?	2 3 4 5
2 3 4 5 6	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was.	2 3 4 5 6
2 3 4 5 6 7	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period.	2 3 4 5 6 7
2 3 4 5 6 7 8	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's	2 3 4 5 6 7 8
2 4 5 6 7 8 9	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's a document from 15 August 1999 and it looks at Al298	2 3 4 5 6 7 8 9
2 3 4 5 6 7 8 9 10	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's a document from 15 August 1999 and it looks at Al298 "System Stability".	2 3 4 5 6 7 8 9 10
2 3 4 5 6 7 8 9 10 11	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's a document from 15 August 1999 and it looks at Al298 "System Stability". Point 2:	2 3 4 5 6 7 8 9 10 11
2 3 4 5 6 7 8 9 10 11 12	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's a document from 15 August 1999 and it looks at Al298 "System Stability". Point 2: "Evidence from the live trial shows that the counter	2 3 4 5 6 7 8 9 10 11 12
2 3 4 5 6 7 8 9 10 11 12 13	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's a document from 15 August 1999 and it looks at Al298 "System Stability". Point 2: "Evidence from the live trial shows that the counter system is unstable and lacking the 'industrial strength'	2 3 4 5 6 7 8 9 10 11 12 13
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's a document from 15 August 1999 and it looks at Al298 "System Stability". Point 2: "Evidence from the live trial shows that the counter system is unstable and lacking the 'industrial strength' necessary for a production environment."	2 3 4 5 6 7 8 9 10 11 12 13 13
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's a document from 15 August 1999 and it looks at Al298 "System Stability". Point 2: "Evidence from the live trial shows that the counter system is unstable and lacking the 'industrial strength' necessary for a production environment." Over the page, please sorry, if we could scroll	2 3 4 5 6 7 8 9 10 11 12 13 14 15
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's a document from 15 August 1999 and it looks at Al298 "System Stability". Point 2: "Evidence from the live trial shows that the counter system is unstable and lacking the 'industrial strength' necessary for a production environment." Over the page, please sorry, if we could scroll because I can tell you it looks at the business impact	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's a document from 15 August 1999 and it looks at Al298 "System Stability". Point 2: "Evidence from the live trial shows that the counter system is unstable and lacking the 'industrial strength' necessary for a production environment." Over the page, please sorry, if we could scroll because I can tell you it looks at the business impact at 3 and one of the business impacts or it is, in	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's a document from 15 August 1999 and it looks at Al298 "System Stability". Point 2: "Evidence from the live trial shows that the counter system is unstable and lacking the 'industrial strength' necessary for a production environment." Over the page, please sorry, if we could scroll because I can tell you it looks at the business impact at 3 and one of the business impacts or it is, in fact, phrased as an "other impact", over the page, point	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's a document from 15 August 1999 and it looks at Al298 "System Stability". Point 2: "Evidence from the live trial shows that the counter system is unstable and lacking the 'industrial strength' necessary for a production environment." Over the page, please sorry, if we could scroll because I can tell you it looks at the business impact at 3 and one of the business impacts or it is, in fact, phrased as an "other impact", over the page, point (v), it refers to:	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's a document from 15 August 1999 and it looks at Al298 "System Stability". Point 2: "Evidence from the live trial shows that the counter system is unstable and lacking the 'industrial strength' necessary for a production environment." Over the page, please sorry, if we could scroll because I can tell you it looks at the business impact at 3 and one of the business impacts or it is, in fact, phrased as an "other impact", over the page, point (v), it refers to: "Risk of errors and impact on POCL transaction	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's a document from 15 August 1999 and it looks at Al298 "System Stability". Point 2: "Evidence from the live trial shows that the counter system is unstable and lacking the 'industrial strength' necessary for a production environment." Over the page, please sorry, if we could scroll because I can tell you it looks at the business impact at 3 and one of the business impacts or it is, in fact, phrased as an "other impact", over the page, point (v), it refers to: "Risk of errors and impact on POCL transaction processing due to increased errors in fall back."	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's a document from 15 August 1999 and it looks at Al298 "System Stability". Point 2: "Evidence from the live trial shows that the counter system is unstable and lacking the 'industrial strength' necessary for a production environment." Over the page, please sorry, if we could scroll because I can tell you it looks at the business impact at 3 and one of the business impacts or it is, in fact, phrased as an "other impact", over the page, point (v), it refers to: "Risk of errors and impact on POCL transaction processing due to increased errors in fall back." Point 4 talks about a severity rating. POCL's	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. A.	service"? I think I was the programme was concentrating on sorting out the issues in front of us. So it was looking forward, rather than looking back? Yes, it was. Let's look at a couple of incidents during this period. Can we look at POL00028337, please, and that's a document from 15 August 1999 and it looks at Al298 "System Stability". Point 2: "Evidence from the live trial shows that the counter system is unstable and lacking the 'industrial strength' necessary for a production environment." Over the page, please sorry, if we could scroll because I can tell you it looks at the business impact at 3 and one of the business impacts or it is, in fact, phrased as an "other impact", over the page, point (v), it refers to: "Risk of errors and impact on POCL transaction processing due to increased errors in fall back." Point 4 talks about a severity rating. POCL's severely rating in relation to this issue is high, and	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23

1		So, certainly, I'm happy more than happy to
2		spend some time on that. You don't deny, though, having
3		said that it was "robust and fit for service"?
4	Α.	I that was the record of the meeting. Whether I was
5		given the minutes to agree or not, I don't know, but
6		that's the record of the meeting.
7	Q.	•
8	·	that's POL00028362, and the final page which was the
9		view on the national rollout, where it says:
10		"The steer from the Board is not to accept
11		a sub-standard system."
12		We have, at the bottom there, a long list of high
13		and medium severity incidents. I mean, this whole
14		meeting here seems to be about Pathway not meeting
15 16	^	conditions; would you accept that?
16 17	A.	It's an analysis of where that was clearly correct.
17	Q.	Were there concerns, at that stage, amongst those who were working on the project?
18		5 I J
19	Α.	Yes. There were also concerns, if you look at Pathway's
20		view and POCL's view, about the view of certain
21	~	incidents.
22	Q.	It seems as though POCL's view was things were worse
23		than Pathway were accepting?
24	A.	Yes.
25	Q.	How did you feel at that stage, having told the board 70
1		"POCL assert that this Acceptance Incident is High
1 2		"POCL assert that this Acceptance Incident is High because it clearly comes under the contractual
2		because it clearly comes under the contractual
		because it clearly comes under the contractual beginnings of High 'Failure to meet an Acceptance
2 3 4		because it clearly comes under the contractual beginnings of High 'Failure to meet an Acceptance Criterion which would have a substantial impact on the
2 3 4 5		because it clearly comes under the contractual beginnings of High 'Failure to meet an Acceptance Criterion which would have a substantial impact on the service received by the customer'. Pathway have advised
2 3 4 5 6		because it clearly comes under the contractual beginnings of High 'Failure to meet an Acceptance Criterion which would have a substantial impact on the service received by the customer'. Pathway have advised that their understanding of the rate of occurrence
2 3 4 5 6 7		because it clearly comes under the contractual beginnings of High 'Failure to meet an Acceptance Criterion which would have a substantial impact on the service received by the customer'. Pathway have advised that their understanding of the rate of occurrence constitutes a Low severity rating. However, the
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23		because it clearly comes under the contractual beginnings of High 'Failure to meet an Acceptance Criterion which would have a substantial impact on the service received by the customer'. Pathway have advised that their understanding of the rate of occurrence constitutes a Low severity rating. However, the statistics on which this conclusion was based has now been proven to be incorrect. In fact, the rate of occurrence has now been shown to be 48 times greater than that on which ICL Pathway based their assessment. In comparing the performance of Horizon with that of POCL's legacy systems (ECCO and ALPS), it should be noted that the reboot rate per terminal for Horizon is 35% compared with ECCO at 0.30% and ALPS at 0.75%." So this was an Acceptance Incident where the main problems were things like system freezes, non-visible problems sorry, visible problems, rather than necessarily It was. invisible problems but, as we saw slightly above on this page, at page 5, there was, nevertheless, included

1	Q.	At the time, would you have been aware of this detail?	1	
2		This kind of document, would you have seen that?	2	
3	Α.	I'm not aware of having seen this document before. I am	3	
4	~	not saying that I didn't see it at the time.	4	
5	Q.		5	
6 7		your attention?	6	
7	A.	5	7	
8	Q.	Over to page 5 and this looks at Acceptance	8	
9 10		Incident 376, "Lack of data integrity on the data	9	
10 11		stream(s) across the TIP interface". Can we look at paragraph 2:	10 11	
12		"Pathway claim that they have discovered all the	12	
12		root causes"	12	
13		Then, just while we are on this, sorry, it's still	13	
14		15 August 1999, let's look at paragraph 3:	14	
16		"However, Pathway's paper <i>TIP Acceptance Incident</i>	15 16	
17		Clearance Update from Lorraine Holt (13/8/99)	10	
18		provided to POCL on [13 August 1999] indicate that this	17	
19		problem can be caused by a number of root causes,	10	
20		including faults that do not have the same profile as	20	
20		that described above and not all of which have been	20	
22		fully analysed or fixed."	21	
23		Can we look at paragraph 4:	23	
24		"Furthermore, there has been an incident where	24	
25		wholesale numbers of transactions were not sent to TIP	25	
20		73	20	
1		and therefore POCL has not received any description of	1	
2		how and when all these faults will be fixed. Pathway	2	
3		has admitted that they do not yet fully understand the	3	
4		root cause of all the problems. A 'workaround' has been	4	
5		offered which attempts to trap and correct errors after	5	
6		they have occurred but this cannot provide assurance of	6	
7		a complete solution to the faults in the service, nor	7	
8		has POCL had visibility of the testing plan to ensure	8	
9		that the fix does not introduce further problems.	9	
10		"It is a fundamental of any accounting system that	10	
11		it provides a complete and accurate record of all	11	
12		transactions."	12	
13		It goes on to talk about the problems if there is	13	
14		not a complete and accurate record of all transactions,	14	
15		including, for example, if we look at paragraph 5, it	15	
16		says:	16	
17		"Given the nature of the errors concerned the	17	
18		potential is for these write-offs to be significantly	18	
19		threatening the business performance against shareholder	19	
20		targets and potentially as a going concern."	20	
21		I mean, it seems as though they had in mind at that	21	
22		stage the errors being dealt with by way of write-offs,	22	
23		rather than possibly prosecutions.	23	
24	-	If we look at paragraph	24	
25	Α.	Whether I I would be interested to know what 75	25	
		10		

1		due to an (albeit unusual) internal processing error
2		within Pathway's central systems."
3		The final sentence in that paragraph is:
4		"Pathway have indicated that they would be willing
5		to discuss with POCL how they might do this (on
6		an ongoing basis) and admit that there may well be
7		future occurrences which they cannot predict."
8		Can we go over the page, please, to "Business
9		Impact", paragraph 1 I will, unfortunately, spend
10		a bit of time on this document, do let me know if you
11		need a break at any stage:
12		"The ICL Pathway service is an integral part of
13		POCL's client accounting system indeed the service is
14		an accounting service. As such it accounts for turnover
15		of £140 billion per annum involving some 3 billion
16		transactions. Given the scale of this system even
17		relatively small defects are capable of generating
18		errors within the accounts of very significant amounts.
19		POCL's existing manual and legacy automation systems,
20		which Pathway's service will replace, are designed to
21		minimise and correct such errors by incorporating
22		controls and appropriate validation procedures."
23		Can we go to paragraph 3, please:
24		"Pathway has not provided POCL with a complete
25		description of all the faults creating the missing data
		74
1		the accounts that they're talking about here because
2	~	this is reflected in the balance sheet accounts
3	Q.	Yes.
4 5	Α.	and TIP was harvesting information on the front end
5		and was then settling with major clients. And I think
6 7		there was a serious concern if that was not happening
7		correctly. So and it is actually highlighted,
8	~	I believe, as one of the issues in the Deloittes letter.
9	Q.	Absolutely, and I will, I promise you, get to that
10		letter. I think that's actually the next paragraph,
11		that's paragraph 6, where it talks about:
12		"These balances are also the basis of settlement
13		with clients."
14		Might that be the relevant paragraph about
15	A.	Yes.
16	Q.	It's the final sentence, or final sentences of that
17		paragraph, actually, that I wanted to draw to your
18		attention, which is:
19		"Integrity failures could thus become a matter of
20		public record damaging the reputation of POCL.
21		Integrity is one of the major attributes of the brand
22		such damage would, therefore, be substantial."
23		Over the page, paragraph 7:
24		"Finally this level of difference is operationally
25		unsustainable. The level of resource necessary to 76

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1		investigate and resolve these differences is significant	1
2		at the 5,500 level and at the higher level the resource	2
3		requirements are impractical"	3
4		It says a little further on:	4
5		" error levels are currently running at twice the	5
6		normal pre-Horizon baseline."	6
7		Can we go over the page, please. There's	7
8		a "Rectification Plan", and it is paragraph 3 of that	8
9		rectification plan, it says:	9
10		"POCL require a period of time with <u>no</u> incidents	10
11		being reported or identified by TIP this must, as	11
12		a minimum, cover two full consecutive cash account weeks	12
13		and include a cash account period end."	13
14		Now, would it be fair to say, it looks from this	14
15 16		document as though it is seen as a very significant	15 16
16		issue relating to accounting integrity and it seems to	16 17
17 18		be so serious that, at that stage, that is August 1999, POCL would like a period of time with no incidents being	17
10		reported or identified by TIP?	18
20	Α.		19 20
20 21	А. Q.	And, I think, even though it seems at this stage ICL are	20 21
21	ω.	saying that they can't guarantee that there wouldn't be	21
22		further incidents. Do you remember these kinds of	22
23 24		discussions about AI376?	23
24	Α.	I don't remember the discussions at that detail, the	24
20	<b>.</b>	77	20
1	A.	Yes, but I think as a general issue that we wanted to	1
2	<b>~</b> .	keep our auditors informed of progress and possible	2
3		impacts.	3
4	Q.	It's the third paragraph down, it talks about the live	4
5	<b>.</b>	trial at that stage being limited to 323 outlets, and it	5
6		now goes on to talk about incident 376. It says:	6
7		"The following issue, as described to us by POCL	7
8		gives us concern as to the ability of POCL to produce	8
9		statutory accounts to a suitable degree of integrity.	9
10		We understand that POCL has attributed a severity rating	10
11		of 'High' to this matter.	11
12		"Incident 376. Data Integrity In order to test	12
13		the integrity of weekly polling of Horizon cash account	13
14		transactions, POCL are reconstructing a weekly total by	14
15		outlet from daily Horizon pollings. At present this	15
16		control test is showing discrepancies in that certain	16
17		transactions do not record the full set of attributes	17
18		and this results in the whole transaction being lost	18
19		from the daily polling."	19
20		So that's talking about in branch, isn't it?	20
21	Α.	Yes, it's talking about information in the branch that	21
22		has not got the attributes that it should have.	22
23	Q.	It says:	23
24		"We are informed that an incident has also occurred	24
25		where transactional data committed at the counter has	25
		79	

i inquiry	28 October 2022
	level of detail being dealt with here, but clearly it
	was it was in my view.
Q.	The severity of the issues there presumably would have
ч.	been on your mind in August 1999?
А.	Yes.
Q.	Still in August 1999, can we look at POL00090839,
	please. Now, this is the letter that we have been
	talking about. I think you were originally provided
	with an incomplete version of this letter and we have
	now managed to obtain the entire letter. For the
	record, the incomplete version was at POL00028439 but
	this now is the complete version.
	It is the second page here which is the letter to
	you from Ernst & Young. "Horizon acceptance testing":
	"As auditors of The Post Office we have been asked
	by Post Office Counters Limited to provide you with our
	views in respect of certain accounting integrity issues
	arising from tests performed by POCL on Horizon data in
	the live trial."
	Can I just confirm, I think you have said that
	did you request this specifically from Ernst & Young?
Α.	Somebody in the business did, quite possibly Stuart
Q.	Sweetman. Presumably because they were so concerned about the
ч.	impact on accounting integrity?
	78
	been lost by the Pathway system during the creation of
	the outlet cash account and has not therefore been
	passed to TIP in the weekly cash account sub [figures].
	"Both types of incident result in a lack of
	integrity on each of the two data streams used by POCL
	to populate its central accounting systems. We
	understand that the cash account data stream is the
	primary feed for POCL's main ledgers and client
	reconciliation processes."
	Can we go over the page, please. Let's look at the
	second paragraph, it says:
	"It is a fundamental of any accounting system that
	it provides a complete and accurate record of all
	transactions. These discrepancies suggest that the
	ICL Pathway system is currently not supporting this fundamental.
	"POCL have informed us that these items have
	resulted in difficulties substantiating the cash account
	balances which form the basis of certain items in the
	balance sheet. We understand that the issues are not
	attributable to specific outlets or to specific products
	on a continuing basis. It is not therefore possible to
	quantify the likely impact on client balances, or the

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resulting implications for POCL's financial statements,

80

as the incidents cannot be forecast."

1		Looking at one more paragraph just above "Impact" it	1
2		says:	2
3		"We also understand that POCL have identified	3
4		a number of other incidents which also impact on the	4
5		accounts. These may also be relevant to us in reaching	5
6		our audit opinion, as they may be indicative of further	6
7		uncertainties."	7
8 9		Now, accountants telling a company that its statutory accounts are at risk is very serious indeed,	8 9
9 10		isn't it?	1
11	Α.	Yes.	1
12	Q.	Did you understand the term "fundamental uncertainty"?	1
13	Α.		1
14	Q.	If we go over the page, it is explained there. What did	1
15		you understand by that?	1
16	Α.	That was a qualification on the account.	1
17	Q.	Now, surely this was something to bring to the attention	1
18		of the board, wasn't it?	1
19	Α.	Yes.	1
20	Q.	If we look at the first	2
21	Α.	Sorry, I think what this was saying is, if these things	2
22		aren't sorted, this will what will happen when we do	2
23	_	your next audit.	2
24	Q.	Yes, and if we look at page 2 of this document, is that	2
25		your writing at the top? 81	2
		0.1	
1		of that was sufficiently strong at that time, I really	1
2 3		can't remember. In reviewing all this, I admit to	2
3 4	Q.	a certain unease. So are you saying that, looking back, things should have	3
5	ч.	been done differently?	5
6	A.	Possibly, but I would point out that this Stuart	6
7		Sweetman was the managing director and he was a member	7
8		of the board that we have been discussing. So there was	8
9		an assumption, I think, on my part that, as a member of	ç
10		that board, he would be taking forward key issues.	1
11	Q.	It was you at that original board meeting though who was	1
12		the technical man?	1
13	Α.	Yes.	1
14	Q.	It lay on your shoulders, at least at that meeting, to	1
15		assure them in terms of the robustness of the system?	1
16	Α.	Yes.	1
17	Q.	So do you think, looking back now, that, having received	1
18		a pretty significant letter from Ernst & Young about	1
19		accounting integrity, that might have been the moment to	1
20		go back to the board?	2
21	Α.	I'm the route back to the board was through Stuart	2
22	~	Sweetman, as far as I was concerned.	2
23 24	Q.		2
24 25		Office Counters Limited about the significance of this document?	2 2
20		addument?	2

1	Α.	It is.
2	Q.	So I think you are bringing it to Bruce McNiven and
3		Keith Baines' attention
4	Α.	Yes.
5	Q.	and saying:
6		"Please ensure that these issues are fully addressed
7		during the remaining acceptance process. Keep me in
8		touch."
9		Do you know if there was follow up from that?
10	Α.	I'm sure there would have been.
11	Q.	How well-known would this issue have been within the
12		organisation?
13	Α.	I don't think it was generally known but I think it was
14		known by the people who ought to have known about it.
15		Certainly, Stuart Sweetman would have been aware of
16		this.
17	Q.	Do you remember discussing it with Stuart Sweetman?
18	Α.	I don't remember but, given what it's about, I find it
19		very difficult to think it wasn't discussed with him.
20	Q.	Wasn't this the time to go back to the board and say
20	ω.	"I made a mistake with the assurance I previously gave
21		you"?
		I'm not sure. I was I was, again, looking to solve
23	Α.	
24		the problem. You have pointed out very clearly what was
25		said in the board minutes to me. Whether my awareness
		82
1	А.	I think there was an awareness amongst the people who
1 2	A.	I think there was an awareness amongst the people who should have known about it.
		should have known about it.
2		should have known about it. WYN WILLIAMS: When you say "the people who should have
2 3 4		should have known about it. WYN WILLIAMS: When you say "the people who should have known about it", can you actually tell me their names,
2 3 4 5	SIR	should have known about it. <b>WYN WILLIAMS:</b> When you say "the people who should have known about it", can you actually tell me their names, so I've got them on my radar, so to speak?
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(21) Pages 81 - 84

1	Q.	I think he wasn't technically a member but he attended	1		between ICL F
2		the board; is that correct?	2		"During th
3	Α.	Yes, he did.	3		cash accounts
4	Q.	While we're on Acceptance Incident 376, can we look at	4		reconcile to th
5		FUJ00079178, please. Now, this was a resolution plan at	5		transaction str
6		September 1999. You may well not have seen this	6		Now, we s
7		document. I don't think you are named on the document.	7		It seemed as t
8		I'm just going to take you to a couple of points there	8		relating to this
9		and you can tell me if you do or don't recall anything.	9		recall a move
10		Can we go to page 5, please. This sets out the	10		accepted that
11		"Purpose", and it says:	11	Α.	l don't recall d
12		"This document sets out ICL Pathway's proposal that	12		there was a m
13		Acceptance Incident 376, currently categorised as Medium	13	Q.	Would you, at
14		by Pathway and High by POCL, should be recategorised by	14		1999, have be
15		POCL as Medium, and that the Resolution Plan is	15		be issues that
16		satisfactory and should be agreed."	16		acceptance we
17		Do you remember that, ICL wanting this particular	17	Α.	Yes.
18		incident	18	Q.	Essentially, a
19	Α.	I don't, I'm afraid. But it wouldn't be uncommon for	19	Α.	Yes.
20		there to be debate at this time across a range of issues	20	Q.	Can we look a
21		about their severity.	21		Acceptance In
22	Q.	Let's have a look at page 9 and see if it assists at	22		what we know
23		all. It discusses "Closure Criteria" there. It's the	23		Now, let's
24		bottom of page 9, please. Thank you. We see there the	24		"A large n
25		third point, "Closure criteria", that's being agreed 85	25		during the live
1		payments totals do not balance on the outlet weekly Cash	1		rate (less than
2		Account. This exposes a lack of integrity in the double	2		been attribute
3		entry accounting functions of the Horizon System,	3		et cetera.
4		contrary to requirement 803."	4		So even i
5		Can we turn over the page, please. About halfway	5		fixes LT1 and
6		down that page, it begins "Prior":	6		it seems, at le
7		"Prior to the introduction of LT2"	7		accept that?
8		I think is LT2 is a fix of some sort; do you	8	Α.	Yes, but the s
9		remember?	9		much reduced
10	Α.	l don't, l'm afraid.	10	Q.	Absolutely but
11	Q.	Do you at least remember that kind of terminology	11		could it? It see
12		related to a fix, LT?	12		would, neverth
13	Α.	Yes, I think so.	13	Α.	But they were
14	Q.	I think, in fact, the paragraph before says:	14	Q.	Yes, but the in
15		"Fixes were introduced into the LT1 system to	15		fixes applied b
16		correct the single sided sales problem and the print	16		you need to be
17		preview corruption. The revised balancing process	17	Α.	Yes. I think it
18		introduced at LT2 addressed the two other identified	18		a good impact
19		causes.	19	Q.	Let's look at N
20		"Prior to the introduction of LT2 incidents were	20		now Novembe
21		occurring at a rate of around 30-50 outlets per week.	21		the national ro
22		Following LT2 it was anticipated no further incidents	22		Keith Baines t
23		would arise, other than the accepted migration problem.	23		Can we g
24		"Since the introduction of LT2 there have been some	24		if we could sta
25		recurrences of the incident although at a much reduced 87	25		that Keith Bair

Pathway and POCL is that: he Observation Period not more than 0.6 % of ts sent to TIP will be found by TIP not to he Cash Account derived by TIP from the tream due to Pathway processing error." saw earlier the document that I took you to. though POCL originally wanted no errors s particular Acceptance Incident. Do you e over this period where, in essence, it was t a degree of error was inevitable? directly, but I'm not surprised that nove away from zero. t that period, August 1999, or September een well aware that there would, inevitably, t arose and therefore a degree of vould be required? degree of error is inevitable? at POL00028338, please. This is a different ncident. It is Acceptance Incident 211, w as the receipts and payments mismatch. s look at the first paragraph: number of incidents have been reported e trial period whereby the receipts and 86 in 10 in three weeks). Some of these have ed to migration errors which are accepted", in this incident, when Pathway had closed, d LT2 had been introduced, there were still, east some problems occurring; would you sense of this is that those are at a very d level. ut, again, it couldn't possibly be zero, eems to be an acceptance that there theless, still be some problems? e still working on the problem. impression you get here is that there are but, even where there are purported fixes, be careful. Would you agree with that? t's saying that, whilst this has had ct, it's not yet a complete impact. November 1999, POL00028550. So this is er 1999, very late in the day, guite close to ollout. There is an email that is from to yourself and others. go over the page, please -- actually, sorry, ay with that page, I think it explains ines has written you some speaking notes.

(22) Pages 85 - 88

28 October 2022

20 21 22 23 24	А.	be focused on POCL's clients rather than, for example, on subpostmasters and the effect on them? Because I think, in this respect, that was probably true.	21 22 23 24		"We also have some concerns about progress with the new integrity control. While Pathway have been reporting satisfactory progress against plans, our
21 22	Α.	on subpostmasters and the effect on them?	22 23	_	"We also have some concerns about progress with the
21 22		on subpostmasters and the effect on them?	22		"We also have some concerns about progress with the
21					
			01	Q.	Paragraph 12:
		errors may slip through the net but the concern seems to	20		Absolutely, yes.
19	Q.	Yes, so it seems to be an acknowledgement that some	19		that?
18		clients.	18	Q.	The focus is certainly on the clients, would you accept
17		about whether we'd be accurately charging our large	17		and customers.
16		with them. And I think this is expressing a concern	16		looking at our clients, as opposed to our subpostmasters
15		people like Benefits Agency, and so on, and would settle	15		understandably, quite a bit of time on this. But it was
14		came in off the street, but the clients were the big	14	Α.	Yes, I think so, but my point is we spent,
13		clients, that is the from us not customers who	13		of individual subpostmasters?
12		TIP would then assemble a set of accounts and the	12		were incidents that were affecting the cash accounting
11		then be taken to TIP.	11	Q.	Would you accept that, at that particular time, there
10		should have identified it to the harvester, it would	10		happening. That is my understanding.
9		that front and back of those pieces of data, that	9		billing our major clients properly if this was
8		branch. It identified there were parts of the system	8		the branch but it was meaning that we wouldn't be
7		taking certain data from the data available in the	7		I don't think it was interfering with the accounts in
6		I understand it and understood it, was that it was	6		and was this being done completely and properly. So
	Α.	Yes, this is what the TIP system was doing, as	5		forward to settle with the client, were being taken out
4		about	4		relevant bits of that information, that had to go
3		it says the "Client's systems"? Is that talking	3		and being produced in the branch, it was how the
2		Can we scroll down sorry, who would it mean when	2		about the information that was produced in the branch
1		in POCL's or even worse our Client's systems."	1	Α.	Well, in what I have read, it was the issue was not
1		in POCI 's or even worse our Client's systems "	1	٨	Well in what I have read, it was the issue was not
25		Paragraph 11 is a third area, and that says: 89	25		some errors may 'slip through the net' and cause errors 90
24 25		helpdesk.	24 25		of work that will be required to manage errors, and that
23		Paragraph 9 talks about area of concern about the	23		"Thus there is cause for concern, both at the level
22		Can we go over the page, please, to paragraph 9.	22		an integrity control:
21		increases."	21		So potential new incidents that won't be met by
20 21		increasingly disruptive as the automated estate	20		developing."
19		eliminate the occurrence of 'spikes' which would be	19		not have been trapped by the integrity control you are
18		incidents, in line with the rectification plan, and to	18		Also, there have been new incidents that it seems would
17		the make [or 'to make'] the further level in overall	17		"DN John Meagher to confirm if this is correct.
16 17		clearly we need you to continue making progress, both	16 17		It says:
15		one-off events that have resulted in 'spikes' and	15		turnaround target."
14		remaining concern is that there have been a number of	14		causes of in you incidents has not met the 10 day
13		target level has been met though only just. The one	13	Q.	"Other criteria have also not been met. Analysis of the
12		a success. The level of incidents has reduced and the	12	_	Yes, it does, sorry. I don't know precisely.
11		"The first of these, system stability, has been	11	Q.	Does it mean significantly over that
10		paragraph 7, it talks about the first issue:	10	_	I don't know.
9		It goes on to list the various key issues and, at	9		more"?
8		be met. This is serious cause for concern."	8		What does that mean, "an order of magnitude or
7		"It is now clear that some of the criteria will not	7		magnitude or more."
6		Let's look at paragraph 3, it says:	6		exceeded the 0.6% target level by an order of
	Q.	Then we look over the page, and there's the briefing.	5		encouraging. The overall level of errors has greatly
	A.	Mm-hm.	4		that interface. Progress in this area had not been
		I think it's called "Negotiation Brief".	3		the development of appropriate integrity controls for
		I don't, but if Keith wrote that then I accept it.	2		accounting data passed from your systems into TIP, and
1		Do you remember this?	1		"The third area was the reduction in errors in

1		a reversion to the old ways of working with the shutters	1		reference data. POCL does not have access to Pathway's
2		being brought down."	2		reference data design, and so it is Pathway's
3		Do you know what that means there?	3		responsibility to ensure that any reference data that
4	Α.	It means that, under PFI and the contract which involved	4		complies with the interface specification is implemented
5		the Benefits Agency, there was a Pathway way of working,	5		safely and with the expressed effect."
6		which was not to encourage close involvement from either	6		Now, I mean, this is all, as I say, late on we're
7		BA or POCL. We had worked very hard to try and break	7		in November 1999 four months on from the board
8		that down. There is a lot of evidence in the bundle	8		meeting where it was described as "robust and fit for
9		about the workshops that were going on, the intense	9		service"; were you not, at that stage, banging on the
10		activity which was focusing on the key problems. This	10		doors of the board and saying "Hang on a minute"?
11		is saying that "reversion to old ways of working with	11	Α.	No.
12		the shutters being brought down" means that we were not	12	Q.	Do you think you should have been?
13		being allowed in so we could satisfy ourselves what was	13	Α.	I'm afraid I will go back to what I was saying to you
14		happening.	14		before. The project sponsor was a member who attended
15	Q.	It continues:	15		that board and my view was the route back to the board
16		"We have seen no progress on development of the	16		was through Stuart Sweetman. I in retrospect,
17		joint processes that will be needed to manage the errors	17		thinking about it now, should I have looped and gone
18		trapped by the control, and on this, and on the	18		directly to the board? The organisation and the way
19		specification of interface processes, we have found	19		that was deployed certainly didn't encourage that.
20		Pathway unwilling to engage in meaningful discussions."	20	Q.	In what way?
21		Perhaps we can briefly look over the next page, so	21	Α.	Well, because we were given responsibilities at
22		this goes on to talk about reference data and it says:	22		a certain level. Those and the targets to meet. The
23		"The prime responsibility under the contract is	23		targets to meet would be monitored, sometimes more
24		Pathway's. The requirement is for Pathway to	24		intensely than others. But looping back up and down the
25		provide a robust service that checks the consistency of	25		organisation was not encouraged because you were seen to
		93			94
1		have a rale and you were meant to fulfil that rale at	1		to the heard, but having rejead them with him was
1		have a role and you were meant to fulfil that role at	1		to the board, but, having raised them with him, was
2	0	that level.	2		there any kind of discourse between you as to what would
2 3		that level. Was it difficult in the organisation to speak up?	2 3		there any kind of discourse between you as to what would happen and, if so, what was the result of what was to
2 3 4	Q. A.	that level. Was it difficult in the organisation to speak up? No. I'm just saying there were channels through which	2 3 4	٨	there any kind of discourse between you as to what would happen and, if so, what was the result of what was to happen, if I can put it in that way.
2 3 4 5	А.	that level. Was it difficult in the organisation to speak up? No. I'm just saying there were channels through which things went.	2 3 4 5	А.	there any kind of discourse between you as to what would happen and, if so, what was the result of what was to happen, if I can put it in that way. I'm sorry, sir, but I genuinely can't remember, but
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2		recurrence of any Cash Account Discrepancies which would	2	
3		not have been detected by the Accounting Integrity	3	
4		Control Release."	4	Α.
5		I think we have heard from some witnesses, and tell	5	
6		me if you agree with this, that this provision was	6	
7		an acknowledgement that it was not always possible to	7	
8		get to the root cause of an imbalance or to make the	8	
9		appropriate correction?	9	
10	A.	I think that's correct.	10	
11 12	Q.	Thank you. I'm going to move to January 2000. Can we	11	
12		look at POL00028507. Now, this is a document you	12 13	
13		don't seem to be a recipient of this document, so	13	
14		I won't go into it in any detail?	14	
16	Α.	Possibly because I was on my way out of the programme at that point.	15 16	
17	0	Absolutely. There is a discussion in this document	10	
18	ч.	about receipts and payments still not matching. Perhaps	17	Q.
19		we can go to page 4, it's the final page, and it is	10	હ.
20		paragraph (d), and the final sentence:	20	
20		"Even if in the future we have an increased number	20	
22		of these errors, posting them to a discrete line will	22	
23		not help TP to manage them."	23	Α.
24		The point is very simple but, in that period, so at	24	Q.
25		the time when you were on your way out, were you aware	25	ч.
20		97		
1		were around was that there were, during that period	1	
2		it seems, an increase in incidents.	2	
3		Would it surprise you that there were an increase of	3	
4		incidents after you left? We can look at page 6, if it	4	
5		assists. It probably won't. I mean, this wasn't	5	MR
6		a document that you would ever have seen anyway, but it	6	
7		says:	7	
8		"During November the number of incidents received by	8	
9		MSU increased to 109, in comparison to October where	9	
10		91 received and resolved by MSU."	10	Α.
11	Α.	I'm sorry, I just wasn't there	11	MR
12	Q.	No.	12	
13	Α.	and this is actually some time after I a number of	13	SIR
14		months after I departed.	14	
15	Q.	Yes, but when you departed, would it have been in your	15	
16		contemplation that things might get worse, not better?	16	
17	Α.	I would have been very disappointed.	17	
18	Q.	In terms of handover, how did you hand over the	18	
19		knowledge that you had gained over those years?	19	
20	Α.	Well, I handed over to David Smith, who is known to this	20	NE
21		Inquiry, who was the Automation Steering Group project	21	SIR
22		manager sorry, the broad Automation Steering Group,	22	MR
23		who was heavily involved with TIP, and we would we	23	
24		would have discussed things, he would have been aware of	24	
25		issues. So it wasn't as though somebody who was	25	
		99		

	that it may be possible that errors could even increase
	after the time that you were there? It doesn't have to
	be in relation to this
Α.	Sorry, I had a view at the time that we had done our
	very best to tie ICL Pathway down to an increasingly
	improving system and that was what we planned to do,
	from the point where it was clear that Benefits Agency
	were getting out, that a deal was done by the Group
	board, the DTI, permanent secretary, and so on, and
	a set of criteria were handed down about how this thing
	was going to be going forward.
	It was clear to us that we needed to get as close as
	we possibly could to ICL Pathway, so I so that was my
	view.
	How that stands up to a reading of the Horizon
	judgment is something, as you can imagine, I have been
_	grappling with for a while.
Q.	Yes. One very final document, and it may be that this
	is after your time. Can we look at POL00029221, please.
	So this is an ICL management monthly incident review,
	covering the period 1 to 30 November 2000. Were you still in post at that point?
Α.	Oh, no. I was by then, I was away.
Q.	I think the point that's made in this and I don't
~.	need to take you to the page because it wasn't when you
	98
	completely fresh to all this was moved in to replace me.
	It was somebody who was part of the programme, a qualified accountant who had significant experience in
	all the systems that were going on in the business.
MR	BLAKE: Thank you very much, Mr Miller. It is now
	approaching lunchtime. There are some questions from
	other Core Participants.
	Is there anything before they speak that you would
	like to say at all?
Α.	No, I don't think at this stage.
MR	BLAKE: Very good.
	Sir, did you have any questions at this stage?
SIR	WYN WILLIAMS: No. Let me ascertain how we should best
	proceed.
	First of all, it became clear to me that some people
	were cold, not least because extra clothing was being
	put on, but I also saw the usher attempting to fix it,
	to use the word "fix", as we often do. Have we
	succeeded in fixing it?
	W SPEAKER: Very much so, sir, we're very grateful.
	WYN WILLIAMS: Right, well, I'm glad of that. BLAKE: Sir, may I say, it may be fixed for some but not
WIR	<b>BLAKE:</b> Sir, may I say, it may be fixed for some but not others. It's a problem with this room and the problem
	sales. It's a presion war this room and the problem

is some of us are under the lights and Mr Stein also

seems to be --

	4	
MR STEIN: Quite comfortable.	1	SIR WYN WILLIAMS: Fine, then that's what we will do. We
<b>MR BLAKE:</b> So, unfortunately, in this building we will never	2	will break for ten minutes and then we will complete the
satisfy everyone.	3	witness.
SIR WYN WILLIAMS: The consensus appears to be that things	4	MR BLAKE: Thank you.
did get better after the usher's intervention. So thank	5	(1.00 pm)
you very much.	6	(Short Break)
Secondly, I make no secret of the fact that I have	7	(1.10 pm)
an important legal meeting with my team this afternoon,	8	Questioned by MR JACOBS
some of whose members are joining by video, and so	9	MR JACOBS: Thank you, sir.
I would like to do it you know, I would like to have	10	I ask questions on behalf of 153 subpostmasters and
some idea where we're going from here. So what is the	11 12	mistresses who are represented by Howe+Co and, Mr Blake,
consensus view about how much longer we need for		we are grateful for him dealing with many of the
additional questions?	13	questions we would raise, so I only have a couple of
MR JACOBS: Sir, if it assists, I'm not going to be very	14	points for you, Mr Miller.
long, probably five minutes at the most.	15 16	I want to ask you about Post Office IT capabilities.
SIR WYN WILLIAMS: Right. Mr Henry or Ms Page?	10	Can we perhaps turn up paragraph 21 of your witness statement, and I think Frankie has the reference for
MR HENRY: Forgive me, sir, may I ask for 20 minutes.	17	,
SIR WYN WILLIAMS: So if we say 30 minutes, is that	10	that.
reasonable, do you think? Then I'm going to ask the	19 20	It is WITN03470100, and we can see that there.
witness something now.	20	You say in your statement that there were
If we were to break for say ten minutes to stretch our legs, would you prefer to do that 30 minutes and get	21	differences in the organisations' approach to major IT projects and the Benefits Agency had a well-established
it out of the way, or would you prefer to have a normal	22	process for undertaking large computer projects but POCL
lunch break?	23	did not and this did not assist smooth working.
<b>A.</b> I would prefer to do the first thing, sir.	24	Now, do you accept that the Post Office lacked
101	20	102
technical competence to fully understand all the	1	knowledge to understand the errors within the Horizon
complexities of the Horizon System?	2	that were causing the shortfalls?
A. Yes, but I would caveat that by saying it wasn't just	3	A. I'm pausing
the Post Office.	4	<b>Q.</b> It's a long question, I'm sorry.
Q. Right. Who else was it then?	5	A. No, I understand exactly. There was, for instance,
A. Well, all three parties.	6	training courses for auditors as part of the Horizon
Q. But you do accept that the Post Office were lacking in	7	programme, so I couldn't say I couldn't agree with you.
technical competencies in this regard?	8	What I'm not sure about is what training the
A. I think we learned about it as time went on but it was	9	investigators got but there was certainly a package for
a huge and extremely complex system.	10	training auditors.
Q. Now, we know that subpostmasters were in court in 2001	11	Q. If we turn to investigators then, did you hear the
and, therefore, they were being investigated by the Post	12	evidence that was given between February and May of this
Office in 2000; you accept that?	13	year by the subpostmasters?
A. Yes.	14	A. I have heard a number of those sessions, yes.
Q. Our clients say, and they have given evidence between	15	Q. The evidence that was largely given was that the
February and May of this year, that the Post Office	16	investigators and the auditors did not appear to
auditors and investigators who investigated them and	17	be interested in what the subpostmasters were saying
suspended them on the basis of apparent shortfalls,	18	about problems with the system. Do you accept that from
appeared to know very little, if anything at all, about	19	what you heard?
the Horizon System.	20	A. Oh, certainly, they were saying that, yes.
My question for you is: do you agree that when the	21	<b>Q.</b> What you say in your statement is that Post Office
Post Office started to pursue subpostmasters, very	22	didn't have well-established processes for undertaking
shortly after rollout, when you were still in post, that	23	projects of this kind?
those auditors and investigators who pursued them for	24	A. In the statement, I think what I'm saying is that the
these shortfalls didn't have the necessary technical	25	Benefits Agency had very well-established processes. It
103		104

1		had done a number and was doing an number of significant	1
2		major programmes in this area, and Post Office Counters	2
3		didn't. So the Benefits Agency took the lead, the	3
4		Benefits Agency was saying, basically, "This is how we	4
5		do it", and there was a certain tension there, I think,	5
6		but	6
7	Q.	, , , , , , , , , , , , , , , , , , ,	7
8		do you mean by that?	8
9	Α.	Well, there was a lot of work that went on to try and	9
10		ensure smooth working with the original development	10
11		agency and the guy who ran that was from Benefits	11
12		Agency, but he really tried and I think the Post	12
13		Office tried to get that going.	13
14		What happened in the and this may sound too	14
15 16		convenient, if so I apologise, but what happened in the	15
16 17		period when I had left that original and before I came	16 17
17		back, I can't comment on. I'm just aware that, when I came back, I said "Where's the spend been on this	
19		•	18 19
20		programme?" and over 80 per cent of it, at the time I came back in 1998, was on the Benefits Agency part.	19 20
20	Q.		20
21	ч.	that the auditors received?	21
23	A.	I don't, I'm sorry.	22
24	Q.	But you're not aware of any training that investigators	24
25	<b>.</b>	received on the IT system?	25
		105	
1	Α.	No.	1
2	Q.	Then, whatever the case, you certainly did not tell the	2
3		board that it was not "robust and fit for service"?	3
4	Α.	That's correct.	4
5	Q.	Now, subsequent to that board meeting matters developed	5
6		which Mr Blake has asked you about this morning: the	6
7		Ernst & Young letter and things of that nature. You	7
8		have acknowledged that, in the wake of your if	8
~		naro donnougoù ana, in no nano er jour "n	
9		I could describe it as a clean bill of health for	9
10		I could describe it as a clean bill of health for Horizon, your character reference for Horizon perhaps,	10
10 11		I could describe it as a clean bill of health for Horizon, your character reference for Horizon perhaps, it would be better if the board knew about those things,	10 11
10 11 12		I could describe it as a clean bill of health for Horizon, your character reference for Horizon perhaps, it would be better if the board knew about those things, yes? I see you nodding and I don't	10 11 12
10 11 12 13	А.	I could describe it as a clean bill of health for Horizon, your character reference for Horizon perhaps, it would be better if the board knew about those things, yes? I see you nodding and I don't I'm sorry.	10 11 12 13
10 11 12 13 14	Q.	I could describe it as a clean bill of health for Horizon, your character reference for Horizon perhaps, it would be better if the board knew about those things, yes? I see you nodding and I don't I'm sorry. Absolutely.	10 11 12 13 14
10 11 12 13 14 15	Q. A.	I could describe it as a clean bill of health for Horizon, your character reference for Horizon perhaps, it would be better if the board knew about those things, yes? I see you nodding and I don't I'm sorry. Absolutely. Yes.	10 11 12 13 14 15
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n IT Inqu	iiry	28 October 2022			
1	Α.	I'm not That depends mean to say they weren't trained			
2	А.	I'm not. That doesn't mean to say they weren't trained but I'm not aware of it.			
3	мр	JACOBS: I'm not sure I have any further questions for			
4	WIIN	you but I will just check with Mr Enright.			
5		I don't have anything else for you. Thank you very			
6		much, Mr Miller.			
7	MR	<b>HENRY:</b> Sir, could Mr Maloney go before me, at his own			
8		request?			
9	SIR	WYN WILLIAMS: Certainly.			
10		<b>MALONEY:</b> Thank you, and thank you to Mr Henry.			
11		Questioned by MR MALONEY			
12	MR	MALONEY: My name is Tim Maloney and I represent a number			
13		of subpostmasters.			
14		We have seen from various documents this morning			
15		that there were, if I could use this generic term,			
16		problems with acceptance, and, in fact, it's probably			
17		now beyond dispute within the Inquiry that there were			
18		problems with acceptance.			
19		There are board minutes that suggest that you, if			
20		I could paraphrase, said to the board that Horizon was			
21		"robust and fit for service" and I acknowledge that you			
22		may or may not have seen the minutes, Mr Miller, and			
23		that but, firstly, is there any reason you might wish			
24		to convey to the Inquiry as to why the minutes might be			
25		inaccurate?			
		106			
1	Q.	Right. When did you leave this project?			
2	Α.	I can't remember exactly, but working back from it			
3		would have been early 2000.			
4	Q.	Early 2000. When did you find out that you were going			
5		to be leaving the project? How many months notice,			
6		effectively, did you have before			
7	Α.	I didn't have "months" notice.			
8	Q.	Sorry?			
9	Α.	There wasn't a month in it, it was			
10	Q.	"You're going"?			
11	Α.	days.			
12	Q.	Right. You now know that many subpostmasters were			
13		unjustly convicted			
14	Α.	I do.			
15	Q.	and their lives have been ruined, in many cases.			

- **A.** I do.
- Q. Many of the difficulties that you saw in the testing of Horizon were the problems that those subpostmasters suffered before they were prosecuted. So if I may just give an example, that it took them many hours to balance -- we have seen that in documents this morning,
- the feedback from the NFSP -- and that it was causing
- them real upset, and those were the problems that they experienced before they were prosecuted, ultimately.
  - Has it ever crossed your mind, Mr Miller, that, 108

1		well, "Is there anything I personally could have done	1
2		but didn't" to try and prevent that?	2
3	Α.	Yes, it has. Just for the record, I bitterly regret	3
4	-	what's happened to the subpostmasters.	4
5	Q.	No, of course.	5
6	A.	Sorry, I	6
7	Q.	No, no, of course. But you, no doubt, would have asked	7
8 9		yourself "Right, well, here I am in this position of responsibility, I'm seeing these problems when we are	8 9
9 10		live testing Horizon. Actually, as it turns out, the	9 10
11		problems that were suffered by subpostmasters ultimately	10
12		were the very same problems that were experienced during	12
13		live testing. I was in this position, is there anything	13
14		I could have done?"	14
15		Have you asked yourself that question and have you	15
16		ever asked yourself the question "Could I've got this	16
17		information to the board?"	17
18	Α.	No on the latter, although I have been forced by the	18
19		questioning to think should I have looped around.	19
20	Q.	Yes.	20
21	Α.	I only became aware of this problem, I regret to say,	21
22		well into the period when the trial, <i>Bates v</i> , were going	22
23		on and I'm, you know sorry, I you know, I'm not	23
24		proud of that, but that's true.	24
25	Q.	You only became aware of it as a problem would you 109	25
		103	
1	A.	I am sorry, but I honestly have no recollection of	1
2		20-odd years ago of those discussions.	2
2 3	Q.	20-odd years ago of those discussions. Have you thought about it?	2 3
2 3 4	Q. A.	20-odd years ago of those discussions. Have you thought about it? I clearly have thought about it.	2 3 4
2 3 4 5	Q. A. MR	20-odd years ago of those discussions. Have you thought about it? I clearly have thought about it. MALONEY: Thank you, sir, that's all I ask.	2 3 4 5
2 3 4 5 6	Q. A. MR	20-odd years ago of those discussions. Have you thought about it? I clearly have thought about it. MALONEY: Thank you, sir, that's all I ask. WYN WILLIAMS: Mr Henry.	2 3 4 5 6
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) 1 2 3	A. Q. A.	mean as a continuing problem after you had left the project, because you were aware of the problems that subpostmasters were facing in the feedback that you received from the NFSP and, indeed, we see it in that crucial document of the audit qualification that would be necessary that you received that letter, so you were aware of problems with the operation of Horizon at the time that you were in post, weren't you? Yes. Yes. But essentially the full extent of the problem you weren't aware of, you say, until the Bates litigation? Of I'm sorry? Until the <i>Bates</i> litigation.
1	Α.	Yes.
5 5 7	Q.	What I was asking you about you have talked about looping around, "Could I have looped around?" Your point of contact was Mr Sweetman, yes?
3	Α.	Correct, sorry.
9 1 2 3 4 5	Q.	Now, the chair has asked you this morning about the conversations or any conversations that you may have had with Mr Sweetman about this issue. If you have racked your brain about what you might have done differently, have you ever racked your brain about what it was that you said to Mr Sweetman, if anything, about whether or not what you were coming to know should go to the board? 110
	Q.	Yes. We know, don't we, that this was a time that the project was bedevilled by delay?
	Α.	Yes. Sorry, yes.
	Q.	We also know that there were emerging very, very considerable rifts between the DTI on the one hand and the DSS on the other. The Benefits Agency on the one hand and POCL on the other.
)	Α.	Are we talking sorry, can I be very clear about the context that you're asking me about. Is this in 1998, at the beginning of 1998 that you're asking me about?
1 2	Q.	No, I'm talking now, moving on and I should have made that clear to you, sir certainly by April 1999.
3 4 5 6 7	Α.	By April 1999 there had been a number of reviews, the Corbett review, the Treasury review and so on, and there was clearly work going on at the highest levels of politics in this country to decide where this programme was going.
3 9 0 1 2 3	Q.	Yes, of course. I think I have been given permission to put a document to you, but I will defer to Counsel to the Inquiry, but it was a letter that you wrote to a Mr Vince Gaskell, CAPS and cards programmes director of the Benefits Agency dated 8 April 1999. Have you seen it, sir?
1	Α.	I have.
5	Q.	You have. Well, I'm going to take it that you have had 112

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1		an opportunity to study it in some	
2	Α.	Well, I haven't got it in front of me.	
3	Q.	You haven't got it in front of you. May it be shown	
4		if it isn't possible to be shown I will then just	
5		concentrate on the final paragraph. It is 00028406 but	
6		obviously I will defer to Mr Blake if it isn't ready	
7		then we will not	
8	MR	BLAKE: Sorry, what does it start with?	
9	MR	HENRY: It is POL00028406.	
10	MR	BLAKE: We can have a look. Mr Miller, if it's not	
11		a document that you have seen before today please do let	
12		us know.	
13	Α.	Okay. Was Mr Henry indicating that he wished to talk	
14		about the end of it or?	
15	MR	<b>HENRY:</b> I will take the letter really just to the	
16		conclusion. May I read out the conclusion, sir, to you.	
17		There are substantial points that have been dealt	
18		with beforehand, so outstanding faults, factually there	
19		are no known outstanding faults that prevent entry to	
20		live trial. Can you remember how this conclusion was	:
21		reached?	:
22	Α.	This is talking about DSS and the CAPS, I believe, being	:
23		migrated onto the system and trialled.	:
24	Q.	I see. So be it. "Additional testing", which is the	:
25		second page: 113	:
1		before be want to that Salact Committee and I mean	
1 2		before he went to that Select Committee and I mean	
2		I'm sorry, I cannot I cannot comment on what it was	
3 4		appropriate which senior very senior person, it	
4 5		was appropriate to go to a DTI Select Committee. I'm sorry, Mr Henry, I can't.	
6	Q.	Of course, of course, Mr Miller, and I don't want to put	
7	ч.	you in an invidious position at all, but you said to	
8		Mr Blake this morning that you were aware of Mr Roberts'	
9		view as to the commercial importance of Horizon, you	
10		said in fact you were very much aware, and you seemed to	
11		agree with his point of view that it was vital to the	
12		survival of the Post Office.	
13	Α.	Post Office Limited.	
14	Q.	Sorry?	
15	α. Α.	Post Office Counters Limited.	
16	Q.	Post Office Counters, yes. That you concurred, in other	
17	ч.	words, with that view. It is no secret that Mr Roberts	
18		saw the future of the Post Office Counters Limited as	
19		being wedded to automation.	
20	Α.	Well, I think if you look at the documents in the	
20	A.	bundle, the work on strategy and so on, it was pretty	•
22		clear that the whole POCL organisation felt that. John	
23		Roberts was the Group managing director, which was	
24		a company letters, parcels and counters which was	
25		about 7 or 8 billion quid, so there were many other	
		115	

1		"We did not intend to suggest that the additional
2		testing that is due to take place will simply replace
3		the previous model office end to end cycles."
4		Changes during live trial, et cetera, et cetera, but
5		I really come to this, your conclusion:
6		"Both of our organisations have made their different
7		viewpoints clear to each other in recent months. We
8		have also sought to co-operate with each other in taking
9		the Programme forward. But it has been my role and
10		responsibility as the Horizon Programme Director to lead
11		in the delivery of this service. This has required me
12		to balance the interests of all parties, and to consider
13		both programme delivery and contractual implications."
14		Mr Miller, who gave you that task, that objective?
15		Was it Mr Roberts together with Mr Sweetman?
16	Α.	I worked with Stuart Sweetman. He was the sponsor of
17		the project.
18	Q.	Of course, but I mean I'm not suggesting that you
19		remember the meeting, but in open source material,
20		Mr Roberts, Mr Sweetman and yourself attended the DTI
21		Select Committee. You weren't asked to give evidence,
22		but Mr Roberts, in June 1999, effectively answered
23		nearly every question that was put by that committee.
24		I mean he was really the dominant force, wasn't he?
25	Α.	He was called to the Select Committee and he was briefed
		114
1		issues on his agenda than just the Horizon project.
2	Q.	Mr Miller, are you trying to protect him?
3	Α.	I'm not trying to protect him at all. I'm trying to
4		I'm sorry, I do apologise. I am trying to get a sense
5		of perspective because it seems to me, from your line of
6		questioning, you are trying to say "Mr Roberts was
7		responsible for all this" and I don't I don't agree
8		with that.
9	Q.	Well, I'm not saying solely responsible, sir, but what
10		about Mr Sweetman, because you said earlier to Mr Blake,
11		very close to the beginning of your evidence, that he
12		would tell the board what they needed to know not
13		your exact words but that was the essence.
14	Α.	Well, he was the project sponsor, Mr Henry, and he was
15		on that board, or he attended that board.
16	Q.	Yes, of course.
17		Could I I mean surely in relation no need to
18		put it up on the screen, but a document you were taken
19		to this morning, POL00028451, talking about the
20		short-term and the long-term risks, short-term liable to
21		be late, incomplete functionality, premature rollout
22		could prove unreliable, long-term fragile software
23		system, difficult to enhance if TIP lost money,
24		difficult to do future changes. I mean surely
25		Mr Roberts, together with Mr Sweetman, would have been
		116

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1		sighted, fully sighted on that?
2	Α.	I'm sorry, I don't have this document in front of me.
3	Q.	It was one that you were actually taken to, but it was
4		the Tom, Dick and Harry document where there was
5		an analysis of short-term and long-term risks associated
6		with this. If you would wish to see it, sir
7	Α.	The date would sorry, it would be 1996 perhaps?
8	Q.	I believe it was. I believe it was. So in other words,
9		from a very early stage they were aware of potential
10		risks associated with Dick?
11	Α.	Yes, there was a whole raft of things that are
12		documented in the bundle about each of the suppliers,
13		so, Mr Henry, yes, you know, there was stuff in there
14		about ICL Pathway quite clearly.
15	Q.	Well, it's up on the screen now. I don't need to take
16		you to it but I just want to concentrate on your
17		background very, very briefly because obviously you had
18		worked at the Post Office since 1970 and you had had
19		a distinguished career in management and you had, for
20		example, been the senior line manager for south west
21		England. We know as well that you were sent off to
22		Bristol to deal with Bristol and South Wales at one
23		point during the currency of this project and so
24		therefore you were, perhaps better than most, aware of
25		the problems and pressures that subpostmasters would 117

1		The only reason I mention it is because, you see,
2		two of the clients I represent, Ms Felstead and Ms Arch,
3		were prosecuted very, very near the beginning,
4		Ms Felstead almost at the beginning of the rollout and
5		she went to prison, you see. Ms Arch was acquitted.
6		But can I ask you, was that ever considered, to your
7		knowledge, by anybody in the working group, as to how
8		the prosecution arm of the Post Office, with which you
9		must have been familiar, how they should treat this
10		data, how they should treat the product generated by
11		Horizon?
12	Α.	I am unaware of any such consideration, Mr Henry.
13	Q.	Right. Could I ask you now to consider this. Would it
14		be fair to say, from the evidence that you have given,
15		that as far as compatibility issues and EPOSS, that you
16		were effectively saddled with Horizon because Horizon
17		had been very, very important, as perceived by the
18		Benefits Agency, because of the fact that there was
19		a way of getting functionality of data passed down to

a significant matter for the Benefits Agency?
I wouldn't say "saddle", but certainly a change of direction would have involved significant and very difficult changes for Post Office Counters Limited.

post offices which was, as you said this morning,

20

25 **Q.** I see, because obviously if you had had a free choice 119

1	encounter.
2	A. Yes.
3	<b>Q</b> . Yes. I just want to bring this back to "fatally
4	flawed", which has been suggested to be a low baseline
5	and I think it is if I may respectfully submit ask
6	you to consider this, whether we should look at that in
7	two senses: from a commercial point of view "fatally
8	flawed", it would be a low baseline and there may have
9	been, I do not know, from the commercial perspective the
10	sense that "these are teething problems, we can work our
11	way through it". Do you follow?
12	A. Was the phrase, "not fatally flawed?
13	<b>Q.</b> Yes, exactly, "not fatally flawed", and that being, as
14	it were, too low a baseline. But from a commercial
15	point of view, eminently pragmatic it might be thought,
16	particularly if there were insuperable political
17	pressures from above, you would have to make it work.
18	But from the point of view of prosecuting people, from
19	the point of view of having unimpeachable and infallible
20	data for prosecutions, that would be a hopeless test,
21	wouldn't it?
22	A. I don't understand that, sir.
23	SIR WYN WILLIAMS: I don't think he needs to answer that,
24	Mr Henry, because it's obvious.
25	<b>MR HENRY:</b> It's obvious, yes. Thank you, sir.
25	MR HENRY: It's obvious, yes. Thank you, sir. 118
25	
25	
	118
1	118 you might not necessarily have gone for Horizon gone
1 2	118 you might not necessarily have gone for Horizon gone to Horizon for the EPOSS function.
1 2 3	<ul><li>118</li><li>you might not necessarily have gone for Horizon gone to Horizon for the EPOSS function.</li><li>A. In an ideal world we would have we probably wouldn't</li></ul>
1 2 3 4	<ul><li>118</li><li>you might not necessarily have gone for Horizon gone to Horizon for the EPOSS function.</li><li>A. In an ideal world we would have we probably wouldn't have started with a system that originated with the</li></ul>
1 2 3 4 5	<ul> <li>118</li> <li>you might not necessarily have gone for Horizon gone to Horizon for the EPOSS function.</li> <li>A. In an ideal world we would have we probably wouldn't have started with a system that originated with the Benefits Agency.</li> </ul>
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- 22 additional and different points, not go for the jugular 23 so to speak.
- 24 MR HENRY: Oh, I'm sorry, sir. I hope I wasn't going for25 the jugular.

1	SID	WYN WILLIAMS: No, no, I'm just being gentle at the	1
2	311	moment.	2
3	MR	HENRY: Very sorry.	3
4		I will return to the board minutes, if I may,	4
5		because we can see from the documents that you were	5
6		shown this morning that you were also expressing views	6
7		around that time, for example an email that passed	7
8		between you and Mr Baines, as to whether Horizon should	8
9		be accepted at all. Do you recall that?	9
10	Α.	I don't recall it exactly, but I'm sure there were	10
11		conversations between me and Keith and other people	11
12		about whether we should be accepting.	12
13	Q.	Exactly, which would be inconsistent with what you are	13
14		reported to have said at the board.	14
15	Α.	Yes.	15
16	Q.	And you were present, weren't you, at that meeting with	16
17		the NFSP on 11 June?	17
18	Α.	l was.	18
19	Q.	And wasn't it made clear by Mr Baker, Mr Colin Baker, at	19
20		that meeting that essentially government had given an	20
21		ultimatum and you had been told, "You have just got to	21
22		work with this, POCL have just got to get on and get it	22
23		done"?	23
24	Α.	I have read those lines in the in that report.	24
25	Q.	Do you disagree with them?	25
		121	
1		Sir, may I be permitted to ask, finally, some	1
2		questions in respect of POL00028419?	2
3	SIR	WYN WILLIAMS: Well, you will forgive me for not having	3
4		that document at my fingertips, Mr Henry. Is this	4
5		a significant document, Mr Blake?	5
6	MR	<b>BLAKE:</b> I don't have that document at my fingertips	6
7		either.	7
8	MR	HENRY: Paragraph 2.1, sir:	8
9		"The incorrect cash account mapping for a stock item	9
10		would have caused misbalancing cash accounts in all	10
11		offices."	11
12	214	WYN WILLIAMS: Well, we've got it up on the screen now,	12
13	мр	so ask your question, Mr Henry. HENRY: I'm very grateful.	13
14 15	IVIT	The date of that document, sir, can you help? Is it	14 15
16		September	15
17	А.	It is.	10
18	Q.	or is it earlier?	18
19	Q. A.	Oh, no, sorry. Is it the 3rd March	18
20	Q.	March. And so this would have been before the letter to	20
20 21	પ.	Mr Gaskell. Again, the rift with the Benefits Agency	20
22		would have been apparent by then, would it not?	21
23	Α.	The rift with the Benefits Agency, in my mind, is very	22
24		much when they when we were told that they were	20
25		leaving the project.	25
		123	

1	Α.	Certainly there was a degree a very high degree of
2		pressure to get on with it.
3	Q.	Yes. And do you think, sir, that as a result of that
4		pressure it may have clouded and you can only speak
5		for yourself, sir, but it may have clouded at times your
6		judgment?
7	Α.	I was balancing a number of pressures about getting this
8		done and a lot of people in various parts of the UK who
9		were very interested in getting it done, and what was
10		happening on the ground.
11		One of the problems I've got at the minute is there
12		is a raft of documents which will explain decisions that
13		took place between August and probably January, release
14		board papers, acceptance papers, which I have not had
15		sight of, and that would explain why we did what we did
16		in terms at the time and in detail and I have asked and
17		I think the Inquiry has asked on my behalf, but, so far,
18		I'm not aware of those documents being forthcoming.
19		So I would like to know, in detail, going over the
20		ground, the considerations that took place at the time.
21		I'm not denying that there was significant pressure to
22		be coped with.
23	Q.	I hope it is apparent by the tone of my questioning that
24		one has sympathy for your position in respect of that
25		but, in conclusion, could I just ask
		122
1	Q.	Yes.
2	Α.	We were aware, because of the various reviews going on
3		that they wanted to leave the project, but I think
4		that I mean, that was a fraught period.
5	Q.	Of course, we know that they left the project in
6		May 1999?
7	Α.	Yes.
8	Q.	Then, by June, agreements had been signed?
9	Α.	Yes. I mean, those agreements were quite heavily
10		prescribed in the agreement that was done by the
11		Treasury board, and so on.
12	Q.	Thank you. Because at 2.1, we have you remember the
13		reduction in the number of transactions throughout the
14		cycle. Do you remember reference
15	MR	<b>BLAKE:</b> Sorry, can I just ask Mr Henry which rule 10
16		question this relates to?
17	MR	<b>HENRY:</b> Well, I'm afraid it doesn't and I was hoping for
18		a little bit of indulgence.
19	SIR	WYN WILLIAMS: Well, I think just tell me what the
20		point is, Mr Henry, rather than is there a specific
21		point in this document that I should underline, so to
22		speak?
23	MR	<b>HENRY:</b> I suppose it is the question about whether you
24		would want to do your driving test in London or whether

you would choose to do it in the Highlands, because it's 124

1	basically I wanted to take the witness, Mr Miller, if	1
2	he could, to help me about reading between the lines	2
3	about the reduction in the way in which testing was	3
4	managed by all parties.	4
5	SIR WYN WILLIAMS: Well, I think we will call it a day, if	5
6	we may, Mr Henry, and I think I would like to say	6
7	MR HENRY: I do apologise.	7
8	SIR WYN WILLIAMS: that as a result of the evidence that	8
9	I have heard in the last two weeks, I'm not suggesting	9
10	for a minute that what occurred in the run-up to the	10
11	Benefits Agency removing themselves from the contract is	11
12	irrelevant, but I'm becoming increasingly of the view	12
13	that what happened afterwards is much more significant,	13
14	as far as I'm concerned. All right? Just to give	14
15	everybody a broad hint.	15
16	On that happy hint we shall adjourn now and start	16
17	again at 10 o'clock on Tuesday. Thank you.	17
18	MR HENRY: Sir, thank you very much for your indulgence.	18
19	(1.49 pm)	19
20	(The Inquiry adjourned until 10.00 am on Tuesday,	20
21	1 November 2022)	21
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