

COMMUNICATIONS MATERIALS – AS AT 06/03/19 22.00

HORIZON TRIAL – NARRATIVE/ KEY MESSAGES

- We are vigorously defending allegations being made about Horizon, the electronic ‘point of sale’ system used in every Post Office branch to record and reconcile each transaction.
- The claims are being made by a small minority of mainly former postmasters and span nearly two decades during which time many tens of thousands of postmasters and their staff have successfully operated Post Office branches using Horizon to process billions of transactions.
- We’ve conducted thorough investigations into individual complaints, sought to resolve some of the claims through mediation and have met with the parties concerned on numerous occasions
- No IT system is perfect but there is no suggestion of fundamental or systemic flaws in Horizon. Instead, all the indications are that Horizon is robust and has become more so over time.
- With a UK-wide network of 11,500 Post Office branches processing 47 million transactions a week we are very alive to potential technical issues, with multiple countermeasures in place to prevent or detect and resolve them
- As the largest cash handler in the UK, with more that £600 million held in our network at any given time, we also depend on our postmasters and their staff to follow agreed procedures to protect Post Office money in their branches. Post Office cannot be present day-to-day in all its branches and relies on postmasters to carry these out diligently.
- We will not comment outside of public Court hearings on specific detail about the allegations being made. It is for the Court to examine the claims and we believe this process provides the best opportunity for the dispute to be heard and resolved.

VERBAL SCRIPT FOR L300 CALL [MARK DAVIES]

- As you are all aware, there is continuing Group Litigation involving Post Office and a small minority of mainly former postmasters
- This is complex litigation and is being heard by the Court through a series of trials. As you know, the first trial - called the Common Issues trial and concerning contractual matters between Post Office and postmasters - was held late last year, ending in early December. The Judgment from that trial

has not yet been handed down (made public) but we will of course provide you with information about it when that happens.

- The second trial in the case is scheduled to start next Monday (11 March) and concerns technical matters about Horizon. The trial will continue until 11 April, although the Court will not be sitting every day.
- Neither the Common Issues trial nor the Horizon trial should decide liability in individual cases. Further trials are being scheduled for November this year and March 2020 and we will keep you updated about these.
- We can of course expect some media coverage about the upcoming Horizon trial. Our media statement will support our overall position – that we dispute and are vigorously defending the allegations being made - but again we will not be providing a running commentary because it is for the Court to examine the claims. Despite difficult and often misleading media coverage we have never discussed individual cases publicly and we will not be doing so outside of public Court hearings. We strongly believe that this is a fair and appropriate approach to all parties.
- We've taken these complaints extremely seriously and conducted investigations, sought to resolve some of the claims through mediation and have met with the parties concerned on numerous occasions. We have done this with empathy for the people involved.
- Extensive scrutiny of Horizon has provided no suggestion of systemic flaws. No IT system is perfect but all the indications are that Horizon is robust and has become more so over time.
- With our branches processing 47 million transactions a week we are very alive to potential technical issues, with countermeasures in place to prevent or detect and resolve them.
- The claims in the litigation span a period of nearly two decades during which time many tens of thousands of postmasters and their staff have successfully operated Post Office branches using Horizon to process billions of transactions.
- We are of course concerned to reassure everyone in the business, especially our postmasters and those working in our network.
- We will be communicating, via One, across the business ahead of next week and, as we have done previously, we will make some background facts and questions and answers available along with contact numbers for any questions or concerns.

L300 EMAIL (following call)

Group Litigation – Horizon Trial

Following our recent L300 call, below is the link providing information about the ongoing Group Litigation involving Post Office.

A High Court trial on technical matters concerning Horizon will be held between 11 March and 11 April 2019 and is the second in a series of trials in this complex litigation.

The first trial - called the Common Issues trial and concerning contractual matters between Post Office and postmasters - was held late last year. The Judgment from that trial has not yet been handed down (made public) but we will of course provide you with information when that happens.

Background information about the litigation can be found [\[here\]](#). We will keep this page updated so please check it regularly and share with your teams.

If you have any questions or concerns please email our communications team:

[communications.team@GRO](#) Media enquiries should be referred directly to our press office: [pressoffice@GRO](#) or telephone: [GRO](#) (24 hours).

Mark Davies

DRAFT MEDIA STATEMENT [NOT FOR INTERNAL PUBLICATION AT THIS STAGE]

Basic statement before Monday (to be reviewed with legal against nature of enquiry):

We are defending the allegations being made by a small minority of mainly former postmasters.

We will not comment outside of Court hearings on specific detail as it is for the Court to examine the claims and we believe this process provides the best opportunity for the dispute to be heard and resolved.

From Monday when trial underway and **subject to confirmation from legal** include: No large commercial IT system is perfect but there is no suggestion of fundamental or systemic flaws in Horizon. The claimants themselves say Horizon is robust and has become more so over time. This is supported by two expert witnesses providing evidence independently to the Court.

ONE COMMUNICATION – MANAGERIAL [BELOW L300]

Group Litigation – Horizon Trial

As you will be aware, there is continuing Group Litigation involving Post Office as part of a long-running dispute with a small minority of mainly former postmasters.

Post Office is vigorously defending the allegations in this litigation concerning the Horizon computer system and other operational and contractual matters.

A trial concerning technical matters about Horizon is being held between 11 March and 11 April 2019.

This is the second of a series of trials in this complex litigation. The first trial - called the Common Issues trial and concerning contractual matters between Post Office and postmasters - was held late last year. The Judgment from that trial has not yet been handed down (made public) but we will of course provide you with information when that happens.

You can find background information about the litigation [\[here\]](#). We will keep this page updated so please check it regularly and share with your teams.

If you have any questions or concerns please email our communications team: communications.team@postoffice.co.uk **GRO** Media enquiries should be referred directly to our press office: pressoffice@postoffice.co.uk **GRO** or telephone **GRO** (24 hours).

Mark Davies

ONE COMMUNICATION – POSTMASTER AUDIENCE [TO BE CONFIRMED WITH LEGAL]

Group Litigation

As some of you may be aware, there is a continuing legal dispute, being heard in the High Court, involving Post Office.

This concerns allegations that for some years have been made by a small minority of mainly former postmasters about Horizon and other operational and contractual matters. A High Court claim was issued in 2016 and Post Office is vigorously defending the allegations.

Between 11 March and 11 April 2019 there will be a trial on technical matters regarding Horizon, the second of a series of trials in this complex litigation.

It would not be fair or appropriate to comment outside of public Court hearings on specific detail arising from the individual cases involved.

But we do want to reassure you that we've taken these complaints extremely seriously and conducted investigations, sought to resolve some of the claims through mediation and have met with the parties concerned on numerous occasions.

There is no suggestion of fundamental or systemic flaws in Horizon. With our UK-wide network of 11,500 Post Office branches processing 47 million transactions a week we are very alive to potential technical issues, with multiple countermeasures in place to prevent or detect and resolve them

It is now for the Court to examine the claims and we believe this provides the best opportunity for the dispute to be heard and resolved. But we very much recognise that the allegations being made can cause concern and if you have any questions please get in touch [\[comms email\]](#).

EMAIL FOR HEADS OF CLIENT RELATIONSHIPS [Mel Corfield]

Group Litigation - Horizon

As you will be aware, we are communicating internally about the High Court trial on matters concerning our Horizon system, part of the Group Litigation involving Post Office. The trial is being held between 11 March and 11 April 2019.

We are expecting more media coverage about the litigation so this brief is to help you communicate with clients as appropriate. **Key messages and an email you may wish to use for this are below. Please ensure the wording is not changed.**

Background information can be found here [\[link\]](#). We will be keeping this page updated and you can of course contact me with any further questions or concerns.

Key messages

- . We are vigorously defending allegations being made about Horizon, the electronic 'point of sale' system used in every Post Office branch to record and reconcile each transaction.
- The claims are being made by a small minority of mainly former postmasters and span nearly two decades during which time many tens of thousands of postmasters and their staff have successfully operated Post Office branches using Horizon to process billions of transactions.
- We've conducted thorough investigations into individual complaints, sought to resolve some of the claims through mediation and have met with the parties concerned on numerous occasions
- No IT system is perfect but there is no suggestion of fundamental or systemic flaws in Horizon. Instead, all the indications are that Horizon is robust and has become more so over time.
- With a UK-wide network of 11,500 Post Office branches processing 47 million transactions a week we are very alive to potential technical issues, with multiple countermeasures in place to prevent or detect and resolve them

- We will not comment outside of public Court hearings on specific detail about the allegations being made. It is for the Court to examine the claims and we believe this process provides the best opportunity for the dispute to be heard and resolved.

Email for proactive use as required

Dear XXXXX

Group Litigation involving Post Office

As you may be aware, there is continuing Group Litigation involving Post Office and a small minority of mainly former postmasters.

Post Office is vigorously defending allegations concerning our computer system Horizon along with other operational and contractual matters.

A trial concerning technical matters about Horizon is being held between 11 March and 11 April 2019 - one of a series of trials in this complex litigation.

Whilst it would not be appropriate to comment outside of public Court hearings on the specific detail arising from the individual cases involved, I do however want to reassure you that there is no suggestion of fundamental or systemic flaws in Horizon.

With 11,500 Post Office branches processing 47 million transactions a week we are very alive to potential technical issues, with countermeasures in place to prevent or detect and resolve them.

The claims in the litigation span a period of nearly two decades during which time many tens of thousands of postmasters and their staff have successfully operated Post Office branches using Horizon to process billions of transactions.

Post Office believes that the Court's process now provides the best opportunity for the dispute to be heard and resolved.

I hope this provides some useful background information but if you have any questions or concerns please let me know.

[xxxxxx]

BRIEFING/ EMAIL FOR SUPPLIERS [Catherine Hamilton]

Group Litigation involving Post Office

Key messages:

- We are vigorously defending allegations being made about Horizon

- The claims are being made by a small minority of mainly former postmasters and span nearly two decades during which time many tens of thousands of postmasters and their staff have successfully operated Post Office branches using Horizon to process billions of transactions
- We've conducted thorough investigations into individual complaints, sought to resolve some of the claims through mediation and have met with the parties concerned on numerous occasions
- No IT system is perfect but there is no suggestion of fundamental or systemic flaws in Horizon. Instead, all the indications are that Horizon is robust and has become more so over time.
- We will not comment outside of public Court hearings on specific detail about the allegations being made. It is for the Court to examine the claims and we believe this process provides the best opportunity for the dispute to be heard and resolved.

Email:

As you may be aware, there is continuing Group Litigation involving Post Office and a small minority of mainly former postmasters.

Post Office is vigorously defending allegations concerning our computer system Horizon along with other operational and contractual matters.

A trial concerning technical matters about Horizon is being held between 11 March and 11 April 2019 - one of a series of trials in this complex litigation.

Whilst it would not be appropriate to comment outside of public Court hearings on the specific detail arising from the individual cases involved, I do however want to reassure you that there is no suggestion of fundamental or systemic flaws in Horizon.

With 11,500 Post Office branches processing 47 million transactions a week we are, as you know, very alive to potential technical issues, with countermeasures in place to prevent or detect and resolve them.

The claims in the litigation span a period of nearly two decades during which time many tens of thousands of postmasters and their staff have successfully operated Post Office branches using Horizon to process billions of transactions.

Post Office believes that the Court's process now provides the best opportunity to for the dispute to be heard and resolved.

I hope this provides some useful background information but if you have any questions or concerns please let me know.

Catherine Hamilton

Email brief for customer services and other helplines [Mel Corfield]

Group Litigation – Horizon trial

Background

As you will be aware, there is a High Court trial on matters concerning our Horizon system, part of the Group Litigation involving Post Office. The trial is being held between 11 March and 11 April 2019. There is background information here [link].

If there are any enquiries the following messages can be used:

We are defending the allegations being made by a small minority of mainly former postmasters.

We will not comment outside of Court hearings on specific detail as it is for the Court to examine the claims and we believe this process provides the best opportunity for the dispute to be heard and resolved.

Please email our communications team ([communications.team@postoffice.co.uk](#)) to raise any questions or concerns. Media enquiries should be referred directly to our press office ([pressoffice@postoffice.co.uk](#)).

I hope this is helpful and we will keep you updated.

Mel Corfield

FACT SHEET ON LITIGATION

- Group Litigation is where a group of people with similar or shared grievances join together to make a claim in the Courts against a person or organisation
- The litigation involving Post Office is part of a long running dispute between Post Office and a group of mostly former postmasters who have made serious allegations about technical, operational and contractual matters
- Between 2012-15 Post Office performed independent investigations and established a mediation scheme for individual complaints.

- In February 2016 it was reported that some former postmasters involved had obtained funding for litigation against Post Office
- In April 2016, a High Court claim was issued against Post Office and in March 2017 the Court issued a Group Litigation Order, a procedural tool to enable the Court to manage litigation affecting multiple parties
- As is usual practice in group litigation, the Group Litigation Order was advertised and promoted for a time specified by the Court to enable potential claimants to seek to join the claim. This was done by the claimants' legal representatives between 17 March 2017 and 17 November 2017. There are 557 claimants, with individual complaints that span the past two decades. This represents a very small proportion of people who have worked in our network using our systems during that time
- The case is very complex and the Judge has ordered that it will be heard as a series of trials
- The first trial, which finished on 5 December 2018, was about determining the legal construction of the contract between Post Office and agents - the Common Issues trial. The Judgment from this trial has not yet been handed down (made public).
- The second trial, between 11 March and 11 April 2019 is about technical matters concerning Post Office's Horizon computer system
- Neither of these trials should decide liability or the individual claimants' cases. Further trials are scheduled for November 2019 and March 2020.

BACKGROUND FACTS ABOUT HORIZON

Horizon is the electronic point of sale system used across all Post Office branches to record and reconcile each transaction.

The original Horizon system was first introduced in 1995 on a pilot basis in a small number of Post Office branches, before being introduced more widely. The current version - Horizon On Line - was introduced in 2010.

Horizon currently has around 60,000 users and 47 million transactions are processed every week.

QUESTIONS AND ANSWERS

Group Litigation – general

Q. What is the Group Litigation about?

The litigation is part of a long running dispute between Post Office and a group of mostly former postmasters who have made serious allegations about operational, technical and contractual matters. The Judge has ordered that the case is heard in a series of trials.

Q. How many people are involved in the claim against Post Office?

There are 557 mostly former postmasters involved in the Group Litigation Order, with claims that span around 20 years.

We take each of these cases seriously but it's important to understand the context that these cases represent a very small proportion of people who have worked in our network using our systems during that time.

Q. How will the High Court case be finally resolved?

The litigation is very complex. The Court has decided it will be phased and heard in a series of trials: The first trial, which finished on 5 December 2018, was about determining the legal construction of the contract between Post Office and agents - the Common Issues trial.

The second trial, between 11 March and 11 April 2019, is about technical matters concerning Post Office's Horizon computer system

Neither of these trials should decide liability or the individual claimants' cases. Further trials are scheduled for November 2019 and March 2020.

Common Issues Trial (November/December 2018)

Q. How do I find out about the first trial, the Common Issues trial?

The Common Issues trial concerned contractual matters. It ended on 6 December 2018 and the Judgment has not yet been handed down (made public).

Horizon Issues Trial (11 March 2019 – 11 April 2019)

Q. What is the Horizon issues trial about?

This trial is about complex technical matters concerning Post Office's Horizon computer system.

Q. When will there be a Judgment from the Horizon issues trial?

The trial is scheduled to conclude on 11 April 2019. There is no confirmed date for the Judgment. We will keep you informed through our internal communications channels and we will continue to update this page.

Q. What are future trials about and when will they take place?

Two further trials have been scheduled by the Court for November 2019 and March 2020. The content of those trials is still being determined by the Court.

General

Q. I have seen media reports with some former postmasters commenting while Post Office is not – why are we not providing media with comment?

A. We do not believe it is fair or appropriate to comment about individual cases outside of public Court hearings but we're working hard to ensure our overall position - that we dispute and are vigorously defending the allegations being made - is reflected in the media. It's regrettable that some media reporting and online commenting can be partial but we believe that the Court's process provides the best opportunity for the complex matters in dispute to be heard and resolved.

Q. I have been approached by the media, what should I do?

As usual, please simply provide them with the details of Post Office press office ([pressoffice@GRO](#)) or telephone [GRO](#). The press office can be contacted 24 hours a day.

Q. I have been asked questions that I cannot answer from the information provided. Who can I contact?

A. Please advise the person asking you the questions that you will seek a response. Send their contact details and questions to the communications team and we will respond directly. [communications.team@GRO](#)

Q. Is there any change to how branches should obtain help and support?

A. No. Help and support should be sought through our usual channels.