

## Message

**From:** Angela Van-Den-Bogerd [GRO]  
**on behalf of** Angela Van-Den-Bogerd [GRO]  
**Sent:** 14/02/2019 07:24:50  
**To:** Katie Simmonds [GRO]  
**CC:** Jonathan Gribben [GRO]  
**Subject:** RE: Angela Burke [WBDUK-AC.FID123822914]

Hi Katie

I would rather get the amendments sorted sooner rather than later. My availability tomorrow is until 1pm after that my diary is full. If that's no good my availability on Monday is between 12 – 230pm and 330pm and 5pm.

Thanks,  
Angela



**Angela Van Den Bogerd**  
Business Improvement Director

1<sup>st</sup> Floor, Ty Brwydran,  
Atlantic Close, Llansamlet  
Swansea SA7 9FJ

**GRO**

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**From:** Katie Simmonds [mailto:[GRO]]  
**Sent:** 14 February 2019 06:53  
**To:** Angela Van-Den-Bogerd <[GRO]>  
**Cc:** Jonathan Gribben <[GRO]>  
**Subject:** RE: Angela Burke [WBDUK-AC.FID123822914]

Angela

Thank you for sending this through.

We're mindful that when we spoke last month, you mentioned that your team had identified a number of areas where you would like to make clarifications/ corrections to your statement. The current plan for dealing with these corrections is to simply write to the Court/ Freeths a week before trial begins and provide them with a marked up/ corrected version of your statement. Perhaps a call would be best for us to make a note/ discuss all of the corrections you want to make in one go so that we can ensure they all get picked up. When would be best for you to speak? Jonny and I have good availability to speak tomorrow afternoon if that is convenient?

Kind regards

**Katie Simmonds**  
Associate  
Womble Bond Dickinson (UK) LLP

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**From:** Angela Van-Den-Bogerd [mailto:  
**Sent:** 13 February 2019 16:17  
**To:** Katie Simmonds  
**Cc:** Jonathan Gribben; Kathryn Alexander; Shirley Hailstones  
**Subject:** FW: Angela Burke [WBDUK-AC.FID123822914]

Katie

My response to Point 1 is below. I'm still awaiting the information on Point 2 and will provide as soon as I understand what information we've been able to find on this.

Any queries please let me know.

Thanks,  
Angela



**Angela Van Den Bogerd**  
Business Improvement Director





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**From:** Katie Simmonds [mailto:  
**Sent:** 07 February 2019 21:28  
**To:** Angela Van-Den-Bogerd <  
**Cc:** Jonathan Gribben < >; Kathryn Alexander <  
**Subject:** Angela Burke [WBDUK-AC.FID123822914]

Hi Angela

As discussed today, there are a couple of areas relating to Ms Burke's witness statement that we need to look into further. Ms Burke essentially complains about two things:

1. a recovery failure (following an outage, a bank withdrawal effected done by a branch was not recovered by Horizon even though it was successful); and
2. the fact that when Post Office finally sent a TC for the withdrawal, it indicated that the withdrawal was from Lloyds when it should have been from TSB.

### Point 1 - Recovery Failure

As you know, Ms Burke bundled two customers' transactions into one basket and claims that, in relation to the £150 cash withdrawal transaction, Horizon told her to pay the money to the customer before she closed the stack. We should be grateful if you would confirm:

- The steps that would need to have been followed for Horizon to confirm the transaction had been processed and Ms Burke could pay the money to the customer; and

Customer asks to withdraw money from their account and inserts debit card into pin pad machine at post office counter. Counter clerk selects chip and pin icon from Horizon home screen (image 1) and asks customer how much they would like to withdraw (image 2). Customer says £150. Counter clerk keys in £150 to the Horizon screen (image 3 – example is £10 here) and asks customer to enter their pin into the pin pad machine to confirm that the amount that is displaying ie £150 is correct (image 4). Once pin number is confirmed customer is advised on the pin pad screen to remove card from the machine (image 5). Transaction is then authorised and counter clerk presses continue. At this point the 'payment authorised' customer receipt prints. The £150 withdrawal is then added to the Horizon stack and the screen message will be 'Total due to customer' (image 7). The counter clerk then removes the £150 from their till and counts out the cash to the customer. Before handing the cash to the customer the counter clerk settles the basket by pressing the 'fast cash.' The Horizon transaction is then complete and the stack is empty.

**Attached Image List** – these are screen shots taken of a personal banking withdrawal for £10 I did on Tuesday to step through the transaction.

- Image 1 – Home Screen – choose chip & Pin (73)
  - Image 2 – Amount Screen – Branch User enters this
  - Image 3 – Same screen as number 2 with the change captured of branch user entering the £10.00 withdrawal amount requested
  - Image 4 -Pin Pad displays message to customer of what to do and screen advises branch user that customer pin is required to be entered
  - Image 5 - £10.00 transaction authorised and advises customer to Remove Card – Stack has £0.00 at this point
  - Image 6 – Transaction authorised – Branch user has to press continue to complete
  - Image 7 - Completed transaction stack shows £10.00 due to customer
  - Next step would be for branch user to press 'fast cash' to finish (F12)
- Whether or not it is possible Ms Burke was told to pay the customer the money before completing the transaction/ clearing the stack.

As can be seen from the images above the Horizon screen says the transaction has been authorised at image 5 and image 6. Image 7 is when the Horizon screen message is 'Total due to customer' = £10 in the image example.

Is it possible to demonstrate that, if Ms Burke had properly followed all of the procedures and instructions through Horizon, this wouldn't have happened?

There are two areas where Mrs Burke didn't follow the correct process in this instance.

- The first is having more than one customer transactions in the stack at the same time ie she didn't settle the previous customer's basket before entering the £150 cash withdrawal. This did not in this instance contribute to the £150 transaction failing to be recovered.
- The second was in handing the money to the customer before finalising the transaction on Horizon ie pressing the Fast Cash icon. Had Mrs Burke completed the transaction on Horizon before handing the cash to the customer she would have known that there was a problem with the transaction before the customer had left the counter/branch.

However in this case the £150 had already been authorised by the customer's bank and therefore Mrs Burke giving the £150 to the customer was the correct thing to do. As a result of giving the £150 to the customer the branch account would have been showing a loss of £150 as the corresponding £150 cash withdrawal transaction was not showing on the transaction log and therefore not recorded in the branch accounts. Ms Burke was very proactive in tracking down the customer and gathering the information to evidence that the £150 withdrawal had taken place at her branch. However this would have been identified as part of the reconciliation process undertaken at Post Office Finance Service Centre (FSC). There would have been a mis-match between the banking information received from the client and what was recorded on Horizon. This would have then triggered an investigation and in this case a TC to correct the branch account position would have been issued. This is what did actually happen – Mrs Burke was in this instance quicker than the reconciliation process as she had identified the issue as it happened.

## Point 2 - Lloyds/ TSB

Counsel is keen to understand why Post Office would have sent a TC specifying the wrong bank and whether this could have created problems for Post Office when trying to reconcile its Horizon Online data with the corresponding data held by TSC/ Lloyds? Kath helpfully assisted us with this before, copy email correspondence attached, and we can see that the TC narrative was accurate, however, the Item ID from the Horizon entry's narrative was 'Lloyds TSB Cash withdrawl'. We understand that it is plausible that the code for TSB didn't change for a period until after the Lloyds/ TSB split in 2013, however, we're mindful that the relevant transaction here took place on 9 May 2016 so this does appear to be a relatively long period after this time for the code to still be unchanged. Please could we ask you to look into this further, specifically:

1. What happened in relation to the item codes following the Lloyds/ TSB split in 2013 and when were these changed? and
2. Did the fact that the Horizon item code specified the wrong bank create problems for Post Office when trying to reconcile its Horizon Online data with the corresponding data held by TSC/ Lloyds?

As a final more general trial preparation point, the factual witnesses for you to focus on are: Burke, Latif, Patny, Tank and Singh.

I hope the above is all in order but please feel free to give me a call if it would be useful to discuss further.

Kind regards

Katie

**Katie Simmonds**

Associate

Womble Bond Dickinson (UK) LLP



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