

From: Andrew Parsons [GRO]
To: Jonathan Gribben [GRO], Katie Simmonds
[GRO], Michael Wharton [GRO]
Amy Prime [GRO]

Subject: Re: Draft Email to Freeths - KEL Disclosure

Date: Tue, 15 Oct 2019 07:07:26 +0000

Importance: Normal

Inline-Images: imagee04872.PNG; image69ec28.PNG; image7c8192.PNG; imaged83a0b.PNG;
image374e02.PNG; imageccc4a8.PNG

Good to go

On Tue, Oct 15, 2019 at 7:56 AM +0100, "Amy Prime" [GRO] wrote:

All

Additional questions in yellow below re Coyne viewing the previous versions.

Jonny – once this has gone to FJ would you be able to ask the same question to Worden, although from memory I don't think he attended the same demo as Coyne so may not be able to assist?

Thanks

A

Amy Prime
Associate
Womble Bond Dickinson (UK) LLP

d: [GRO]
m:
t:
e:

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womblebond Dickinson.com



Andrew Parsons
Partner

Womble Bond Dickinson (UK) LLP



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From: Amy Prime

Sent: 14 October 2019 20:48

To: Andrew Parsons

GRO

Jonathan Gribben

GRO

GRO

Katie Simmonds

GRO

Michael Wharton

GRO

Subject: Draft Email to Freeths - KEL Disclosure

All

Please find below a draft email to FJ seeking response so as we can respond to Freeths – all thoughts/comments welcome.

Thanks

A

{DRAFT}

Dave, Matthew

We have received the attached letter from Freeths in relation to the disclosure of the previous versions of the KELs. So as Post Office can provide a response to this letter, please could you consider and provide a response to the following queries – given the importance of these documents to the Horizon Issues Trial, it would be appreciated if your response are accurate and provide a detailed explanation where possible. If it would be helpful to have a call to discuss the below before you respond, please let me know.

Scripts

Please could you provide:

1. An explanation of the script(s) and/or methods by which FJ extracted the KELs disclosed in:
 - a. May 2018 (being KELs generated up to March 2018)

b. January 2019 (being KELs generated from March to December 2018 **and** deleted KELs)

2. If a script was used, please could you provide us with a copy of the scripts used in each of the above extractions (up to March 18, March 18 to Dec 18, and Deleted KELs).

Versions

3. We understand from Matthew's email (attached) that when Horizon moved from Horizon Legacy to Horizon Online only the current versions of the KELs were kept and migrated – please could you confirm:

a. where the documents were migrated from and to.

b. On migration, was a back-up taken of the non-migrated KELs?

4. Please could you explain how version numbering operates.
5. Is it possible to amend a KEL without generating a new version? Does each update create a new version? Is the version control automatically generated by the database when any change is made to a KEL, or is it necessary to generate a new version manually?
3. KEL JSimplins4251P (attached) was raised on 9 September 1999, and last updated on 20 Jan 2003 but is shown as being "Version 1". Please could you explain why there is a difference between the raised and last updated dates, but no subsequent versions have been generated? If a KEL has been updated since being raised, should it be Version 2? Is there any way to track what was updated on 20 Jan 2003?

The same query arises in relation to GMaxwell574P, AChambers3558R and PCarroll2243R.

7. When Mr Coyne attended Bracknell to view the KEL, was he informed that previous versions of the KELs were available and if so, was he given the opportunity to view previous versions of a KEL?

3. Alternatively, is it obvious when viewing the KEL system that previous versions are still accessible (for example, they are listed on a side pane)?

9. Please could we arrange webconference demo to show WBD how new versions of a KEL are generated **and how** previous versions of the KELs are viewed ?

Deletion of KELs

10. Matthew's email refers to a "housekeeping procedure" by which FJ deleted versions where the KEL had more than 3 versions - please could you explain how this procedure operated (for example, were these ad hoc deletions or was

a policy followed)?

Duplicates

11. Matthew's email refers to a "defect in the KEL system" which produced duplicate KELs. Please could further information be provided on why these duplicates exist and the reasons why they are believed to have been caused by a defect.
12. Have these documents been reviewed to confirm they are exact duplicates? If not, how did FJ learn that they were duplicates?

Kind regards

Amy