

Selenity post office 11rd
Angele van den berg

Vandenb5t

Lithyden waterline 10021

Tulip2019

HIT Running Order

Jayesh Tark

Ahmed Latif

Arup Pattnay

Angela Burke

Richard Roll

Em Henderson

Anne Roberts -

GRO

12-2pm 2014 Mon

SA - [✓]Phi, [✓]Paul, [✓]Alina, Kels - Sept 19

Madeline - } Temp contact - both due 2 years
Gwen } Sept 19.

Mat - }
Poli } Sept 19. - no role to go back to
Heath }

Haw, Wendy

Cwyn's Supplemental Report - 1st Feb 2019.

3.26. Dalmellington/Burnh Outbreak Issue Bug.

3.27 Receipts & Payments Mis match Bury
↳ 3.33 income

ACTION - Need to see what POL disclosed originally & everything else associated with it.

3.34 Callender Square / Fallmark Bay
63.42

- PostOffice acknowledged bug in 2005, however Lynne's opinion is that it had been in effect since 2000. **ACTION** - need to find out if this is true? And whether any other banks were affected?

3.43. Scope Account Buy

3.45 - ACTION how do we counter this statement?

3.50 ACTION can we check whether the 4 branches referenced had a financial impact?

Tank - Claimant-492

Issue with 2D Barcoding - threaten to hand back the keys in Nov 2015.

Appointed 3rd May 2006 - LDOS 16th March 2017

System crashed 5th April 2008. No transactions failed & no recovery required.

System crashed 14th Oct 2010 - 23rd Oct 2010 base unit was replaced.

→ no loss of transactions or recovery required

PEAK PC0214226 13th Dec 2011

Failed recovery £195.04. 12th Dec 2011 13:33hrs payment authentic

TC for £195.04 prompted on start unit AA @ 8:52am

PEAK PC0251037 30th April 2016

System freezes on BFPD No 5339. Par was trying to process as small parcels rather than medium hence system wouldn't process.

PEAK PC0225150 23rd April 2013.

Unable to locate 6 special deliveries. Error message - failed to settle basket as one of the parcels has already been used by some office

Branch shouldn't have processed the basket / transaction hence system preventing them from doing so

Sept 2013 - March 2017 BTS have been renewed. Losses averaged
£12 per week. All losses made good by postments.

Final account should be full account with all information. Transfer audit don't have full shift figures

Latif - Account 107

NBSC - 16/8/17 - Power out 15/8/17

- 29/11/17 - £791 surprise account since 13th May

- 7/2/18 - 15 helpdesk number

Para 8 of his statement - why would there be a shortfall from a transfer out that didn't register as a transfer in? Simply reverse the transfer out?

18/1/2018 - £500 surplus on OOH → transfer to AA

PATNY 3rd March 2015 - 31st Aug 2016 ^{Suspended.}

Audit Report 17/8/2016 — findings of audit - £5,898.72
Total loss - £42,416 (settled centrally)

During the audit, the Operator's son explained he had added £6000 of £20s to the declaration because he thought there was a plastic bag in the safe from a previous deposit which had not been added to the other £20s.

No letting or ATM at branch.

19th May — call from Charlesfield £16k adjustment to stamps. Now £16k down

20th May — request for evidence.

21st June — £5k investigating. Called Office 21st July spoke to A Park PM advised. Hopefully callback by next week 8/7

3rd Aug — still waiting for resolution / evidence data

CAS - 1841104 - X4V6D5

Rob Houghton - IT Strategy, Post Office Finance

Housing

IBM - limited deliver & FS were banking out. (Decision with AL)

→ Comm - public statement:

→ Decision made by CIO kept at the time.

Technology Strategy Update

Solutions in Belfast

All kit in branches were old

hardware
& system backend out of date

Post Office Network

15000 ~~USD~~

ATOS Service Desk

7000

Cells have halved since we've upgraded.

Hardware purchase

Hardware layer - kit & router - 2018 finished

Software layer - this chest - web-based software

Network layer - branch connects to backend via router.

database
↓

function in cloud

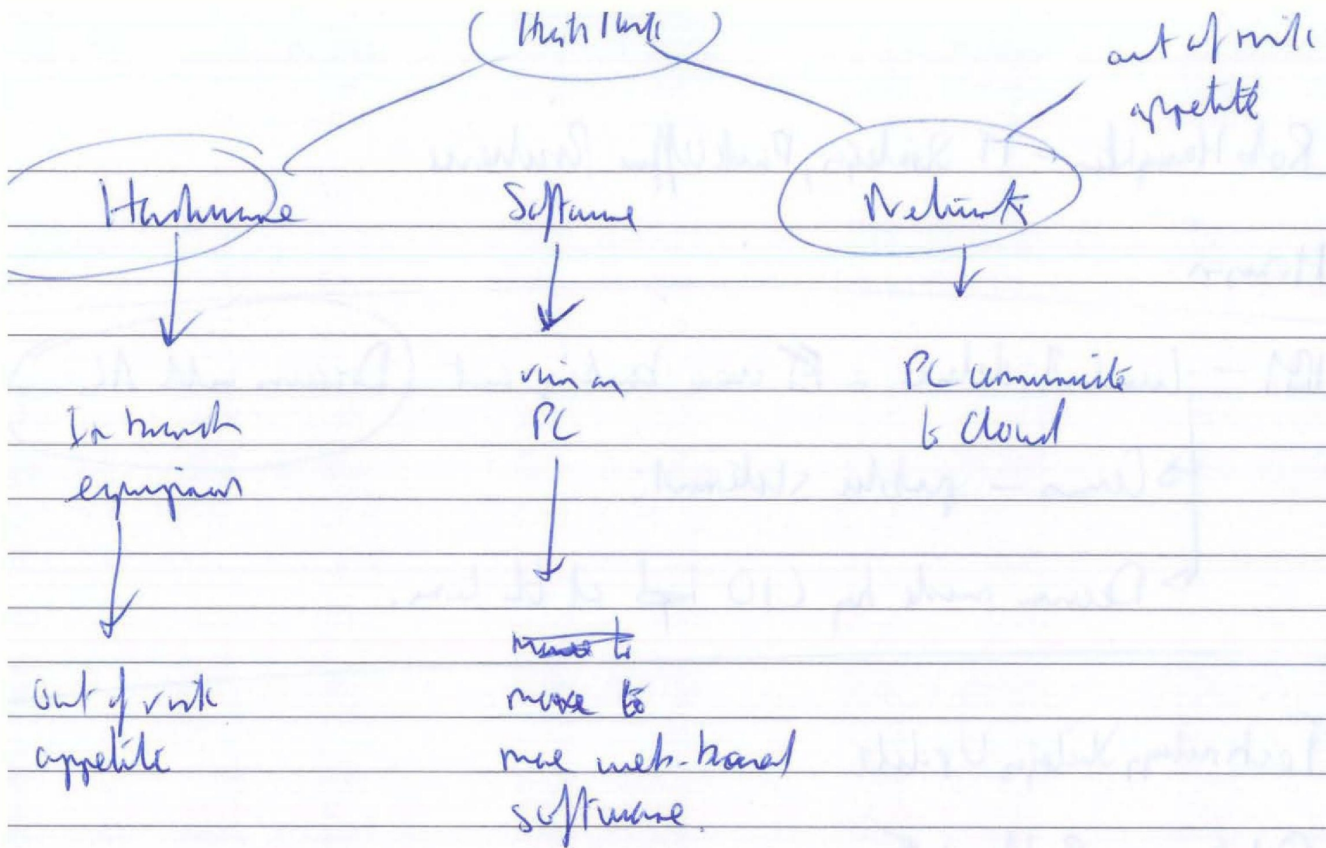
ITVX - IIVGA

move to running

Belfast
Data Centre

Cloud

wait a progress now



Hardware software was performing Robert inadequately.

Back Office MOMP & POLSERV - software running on old hardware

Hardware - in branch } too much for } services produce it but not sufficient
- back end } our appetite

HNGX - HNGA - some work here.

Al & Paula →

Ceremonies - Mel & Mark D

↳ commenting about how behaviour throughout the statement

Call for 2pm. - Jane to take Al through the Judgment -

Contingency Planning - operational & stakeholder

↳ UCCG1 - how do we manage this

↳ Board

para 998 - are relational contracts with implied duties of good faith & long-term relationship

para 1004 - Accounts & Liability

Section 12 Clause 12 - not overans or unusual.

1007 - 1011 NTC liability for losses - overans & unusual.

4 Accounts - not overans or unusual.

5 Suspensions

para 1019 - power to suspend not overans or unusual.

para 1023 -

para 1027 - partially incorrect re: NTC Main contract & Spw contracts for multiple.

1028 - Remuneration withheld during suspension overans & unusual.

6. Termination.

1035 - to terminate without notice for any breach overans or unusual.

Spw contract 3 months notice - overans & unusual

NTC - minimum 1 year before ~~to~~ ~~months~~ clause - makes it not overans or unusual.

7. Compensation for loss of office

↳ Spm contract - onerous or unusual.

Judge: I find that both the Spm & NT contract are written standard terms of business for the purposes of VCTA.

1099. Judge considers Spm contract term for liability for losses to be reasonable.

1115 [542] [41] June 2014

Para 1116 - Spm's do not bear the burden of demonstrating that the BTS is wrong for such a period, when they have disputed a 'settled contract' ~~discrepancy~~ discrepancy.

1117 - not correct. Statute required

1120 - ?? Really?

First Impressions - 8th March 2019

Daniel QC:

'As bad as it could be' 'a bit of a sharker' 'engaged in ~~an~~ campaign'
'gets muddy & muddy!'

Silver lining → he goes so wrong & so over-board

Will require a significant appeal on most points



Jane's update to Alisdair:

Judge has shut out:

- NTC liability for losses
- BTS as an 'account' -

Areas of Priority - from AI

- Appeal case

- How to manage operationally

→ Julie runs the workstream. Amanda's field team will come into play also. Julie is to hand off all BAU work & focus on this.

- Comm Agents

How do we continue to operate through this?

Media

Agents — Strong comm is essential.

People

Customers

Stakeholders/Agents

33 - In accounts, He has used up NTP - compulsory extra?
Discretionary fund? - not in NTP.

Spencefield 515217

Patny - 3rd Mar 2015 - 31 Aug 2016 Suspended.

Bank 17th Aug 2016 - £21,705.34 short settled centrally
outstanding debt £42,423.06

They claim:

£17k loss on 11th May 2016
~~letter~~ 23rd Feb 2016 Money Gram

9th May 2016 - Major IT system Outage

9th May 2016 @ 09.22 No Recovery required. No transactions
between 08.53 & 10.09.

9th May 2016 - variances were £1138.21 loss @ 19.04 & £5060.96
surplus on 10th May @ 18.50hr

11th May 2016 declared £17k loss in weekly balance TPO2 BPO1

11th May 2016 ring NBSC - claimed £16k loss due to coin
rem in of £16k.

Patny claim NBSC asked them to re-adjust the cash stock figure
NBSC by 'Asked them to make sure only one cash declaration
& make sure rem scanned in properly currently

11th May - Rem in £1600 coins

18th May APA001 declared stamps £18,274.99 when previous
on hand figure was £1633.96 declared 11th May 2016

23/2/2016 MBSC will log 'Debit' and debit for moneygram
12.50hrs how to clear 'Answer' settle to cash & then
cancel & reverse

Genus Oct 2015 - refund / cancellation process changed
↳ refund button to cancel, Reverse out using bank
offline reversals
↳ Up to 90 days - all refunds / cancellations
refunded to cash - no need to reverse as well.

3rd May 2016 - Branch Focus reminding branches to call MBSC
to process & refund.

19th Feb 2018 - Branch Focus with Flow chart.

5th Sept 2018 - Branch Focus reminder - never settle debit until
to post cash

23/2/2016 Cash dec L&L short due to MoneyGram refund didn't do
19.15hrs sending reversal.

24/2/2016 'nothing of the discrepancy has been resolved yet -
12.29hrs waiting for TC to be issued - but failed to reverse a
MoneyGram for £6000 that was cancelled on same day!

27/2/2016 'Received TC this morning from Robert Needham what
to do?' Need to accept to clear discrepancy

10/5/2016
14.05hrs Letter from Charterfield asking for £3100 for settled
centrally in Feb. PM thinks this is MoneyGram related
NBSC response - checked twice only 1 MoneyGram
transaction done. If money so would not come loss

23/2/16 11.54 Moneymore Report sent
12.48 Report sent
12.50 Moneymore Cancel.
27/2/16 0738 Moneymore sent £3100

declared loss £17K 11th May
variance £13,032.22 on 12th May
£17,964.41 on 13th May

Stamps 11th May 2016 declared £1633.96 } £16,689.21
18th May 2016 declared £18,274.99 } surplus taking
into account stamps
sold in the week.

Between 11th May & 18th May £16,689.21 loss committed? when?

3rd Aug 2016 loss of £15,759.94 settled to cash but had
intended to settle centrally.

19th May NBOL - £16K adjustment from Charterfield
Akash

26th May NBOL £17K shortage open postage 09/5 £17K loss

8th June 2016 - 'branch had loss in 1st June when they did TP of 17200.
branch are still showing a loss of 17200 although no record
of what they did with the

11th May Rem booked in £1000 - £1
250 - 50p
250 - 20p
100 - 10
20500 - £16K @ £10; £4500 @ £5
26000 - £20

£47K

SU AA (TP02 BP02) 18/5/16

Postage = £18274.99

SU AA TP02 BP03 25/5/16

Postage = £1551.25

SU AA (TP02 BP01) 11/5/16

Postage £1633.96

18/5 Sum 11/5/16

1st class Slp	11	61	72
1st class Lge	115	25	140
2nd class Slp	83	61	144
2nd class Lge	100	44	144
2nd x 100	21		21
bK 1st x 12	263	10	273
bK 2nd x 12	315	19	334
bK 1st x 6	252	18	270

£
2

	11/5/16	18/5/16	25/5/16
1st Class Slips	72		
1st Class Lge	140		
2nd Class Slips	144		
2nd Class Lge	144		
S/g 2nd x 100	21		
SAS blk 1st x 12	273		
SAS blk 2nd x 12	334		
SAS blk 1st x 6	270		

GRO

GRO

Reported by Meriden

327500

285295

LRG Lead Team Meeting - 10th April 2019.

- Spore in FD - note out to SLP expected today. AVDS to speak to Steve Morris
- LRG Scorecard - AVDS to pull together individual scorecard.
- Enterprise Act Senesque Cap - back on Govt Agenda. AVDS need to discuss implications with Jane.
- Working representation on Board - pressure from CWU to move to this way of working
- Policy was passed into law in the 2016 Enterprise Act but legislation necessary to put into practice has yet to go through Parliament.
- Recusal Application - refused by Judge so needs to go to Court of Appeal. POL Board is very uncomfortable / nervous about the whole process
- Select Committee - 21st May 2019. All will need to attend. A note also. Litigation is not the topic but will undoubtedly be mentioned.

Rechnung N°: ~~196~~ 19609117
No Order N° 76300312.

Lucy Mottam - 28th Feb

Sadler in **GRO** - needed Lucy to stay overnight

Months of normal pay - Prearranged with Peggy

MATBI not processed in time. No compassion.

↳ MATBI wasn't processed by HRSC.

• Recomen of Money. Lisa a **GRO** pay - given the
run around by HRSC
Tony Pritchard.

• How did POL do the calculations. Payroll letter from Monday
Taylor.

• Pay slip was wrong - Lucy wanted to check the calculation
for £1600.

£15K overpaid

£7K outstanding

'Made to feel like a thief'

12th Oct 2017 MATBI to Tracy Marshall
Peggy - 26th Nov 2017. 10 weeks early.

June - Sept 2018. normal pay.

21st Sept 2018 MATBI received
by HRSC.

Needed one point of
contact in HR

ACTIONS

Remain

• Back Office Transformation Papers

• Rob's IT Technology Papers

• Dalmellington Bug - presentation from FT. Pete says he presented to me & Chris Bone. Date? I don't recall the meeting but obviously was aware as I asked Keith to investigate the other '2' bundles FT claimed were affected.

Horizon Issues Trial - 11th March 2019

Green - Steering Committee members to see the embargoed judgment -
Judge - 2 members permitted with conditions

UT Judgment - parties don't need to 'come' when it is handed down.

Green

- battle ground
- key differences of experts
- worked example of one bug. Arguments will place greater emphasis on what happens in reality rather than Post Office.

Judge - will allow Tony 4 days for expert cross-examination. TBC

Experts - 4 joint statements

3rd & 4th Line of FT that investigate & produce PERKS

Green

- Agreed multiple bugs that could have prominent impact on bunch
- Between 12 - 29 bugs

Ernst & Young Management -
Letter p.33 & p.34
PERKS

PERKS - been in accounts undetected for some time.

Control measures - changed throughout life of Horizon

Dalmellinger - software ~~has~~ errors will look like user errors ??

TCs - experts agree on the mechanics. Reconciliation are mainly automated.

Hongin reporting & alerting - Hongin doesn't alert users to bugs & errors.
- can't record disputes on Hongin itself. Agreed

Remote access & editing transactions - Hot Potato in trials

- P.O. remote access - read only IT2 para 7
- K1 ability to insert - balancing tool 1 admitted occasion
- Privileged users - edit or delete transactions. Changed over time
- Accounts altered without Spm consent. Dr Worden's 1st statement
- Transaction repair tool - affects only back end data

Issues of Dispute

Rebuttal

- ① utility - determining individual ones in trial p9 para 17.1 in claimants opening

Panorama documentary - POL claims robustness
Genomic defense reflects this language.

page 10 of claimants submission - 'just money is a rare occurrence'
how change x number of transactions is compatible with claimants case.

Surprise Accounts - taking 'gains' to profit.

② Counter measures

- Dr Worden - treatment of TCs as a counter measure. 'one way racket' in Post Office's favour.

P.O. opening - para 114. P.O. processes are outside the scope of this trial.

Cause started with primary source of info & then built up from there.
Warden looked through prison of robustness

(3) Remote Users *Pamorama*

P.O. Public Statement - denied ability to alter branch data

→ page 22 of Claimant's opening statement. PO not told truth

→ P.O. changed position - written response.

→ GLO hearing - P.O. who gave response thought it correct -
- P.O. unaware of the 2 routes

→ General defense - Global user in branch can do transactions in P.O. accounts

Richard Rolls - claims of altering money/transactions in branches

→ GLO Twstein - identified by number created then 32. Hearing
~~Legacy~~ Legacy process.

Parker 1 - inserted transactions by SSC would be identifiable by
Spurs in branch

Dr W - para 1114 - agrees with Twstein.

para 1119 - certain SSC users had ability to insert but not
without Spurs knowing.

Dr W 2 -

Parker - confirms Rolls is right para 27.

Rolls 2 - para 20. Parker confirms Rolls is correct - SSC can piggy back
on logged on user ID. Judge 'all Mr Rolls fault' !!

KEL/PEAK → POL (Unstable definitions)? Need to develop one / HMM approach!

④ Dalmellington Bay - transfer of cash between core branch & outreach

→ When outreach scanned transfer from core it booked in twice. Enter button is pressed more than once & books in the cash accordingly. Hence branch has a shortage.

→ Interesting bug → good example of a particular bug that was visible to postmaster.

PEAK - 949 peak. Priority C - not critical.

KELs - named after the person who sets them up rather than the mine

13th Oct 18k transfer is booked in as £3210.

947 peak - cloned peak. Number is 949. If other branches have had similar issue resolved by removing out the duplicated rem ins.

Peak 207 - not other mentioned yet already.

e-mail correspondence - Mr Parker - 21/10/15

Kendin's email - no process for dealing with disconnected sessions & Dalmellington Rem out issue.

Likely to have happened to other branches previously??

→ FS - did they check all other outreach branches to ensure no Spm had suffered a loss!!

Removing in & out process between Core & Outreach. The Rems should work similar to transfers in & out within branch? Including can't roll-over without outstanding / over Rems!

Kel 15th Oct - Anne Chambers. Fire requested by ATOS. Short-term fire is awareness of branch - don't enter more than one press covered instead.

FT presentation - ^{10th} Dec 2015. 112 ~~int~~ instances over 12 yrs.

Impulse Weekly - ran the story / CWU 18th Nov impulse weekly article

Green - public pressure being applied! FT presentation follows claim ^{was this about Dalmeethington}

Paula Vennells - email from about Tim McCormack. Paula requests a report regarding the content of his blog.

Response from Robtoughlin - urgent review & look force on this cc'd Angela VOB. 1st July 2016. AVOB copied for info.

→ Stand down investigation on this - ACTION. Check with Rob on what happened next.

Letter of claim from Post Office - July 2012. After this email correspondence. Suggests further concealment from Post Office.

Gallender Sq / Falkirk

→ only affects 1 branch. Refers to Cartteton case

→ affected more than 1 branch. 30 branches

Coyne discusses this branch but at Dalmeethington

In hours after Alun's submitted their opening statements Post Office released a further 36 documents.

What are these documents?

2nd Oct 2018 - correspondence in Dalmeington Freebts and for further documents

17th Dec 18 - James

- WBD response

22 Jan 19 - 4 unknown branches from Freebts

1st Feb 19 - Lynne's 2nd statement

11th Feb 19

11th March 19 - documents relating to the bugs

Post Office Public Position - response to SS

11th March 2015 - letter on decision to move to new supplier.

2nd Oct 2016 - para 3. Post Office Transformation paper - AVDB? Post Office Board
- Rob's IT Strategy paper.

Factual evidence from Post Office - actual happened

- more robust position for Judge
- robustness

Tony QC - 11th March 2pm →

Bugs that resulted in listing discrepancies - 12 bugs

1, 2, 3, 10, 13, 14, 18, 23, 24, 25, 27, 28

Disagreed Bugs

Coyne refers to bugs where 'bug' was not referenced in PEAR.

17 - automatic report identified the bug/issues by FJ

21 - interesting not true. Spotted in tested No financial heading

5 - Remaining in issues. P.O reconciliation process checks any mis-match
TC's generated to correct any issues.

Possibility is not the same as Probability.

Assertion that Post Office identified in cost v benefit analysis.

↳ Ultimate submission p144-1. R2C committee 16/2 Apr 2013

Ex 4 report - R2CC Sept 2013. Acceptance of the work from Ex 4 report

Central point - PO Opening
para 40 - 41

Legacy
Tony

↳ Henry is on-line. One ~~occasion~~ ^{occasion} where a balancing transaction was used

↳ Legacy Henry - transactions could be inserted to correct accounts

↳ hardware issues resulted in back-up being done / reviewed.

Judge - concludes that parties/QCs are using terms differently

Tony - Green ~~was~~ claims TCs are remote access.

↳ Tony's approach is that 'can FT remotely access the branch accounts & edit, delete, change in a way that would result in branch discrepancies'.

Tony - POLSAP - TCs are manually entered into POLSAP & then sent to branch

↳ THAs - which system are they generated from?

K&Y 2013 - page 2-4 'Repayments' - not fundamental mis

Shawcross experts - dark inferences are drawn as if something untoward is happening

↳ Adviser need to ensure adverse documents have been disclosed.

Trial Timetable - cross examination of expert witnesses

↳ sensible to have longer

Mr Wynne

w/c 1st April - 4 days. Don't sit on 5th

8th April - Dr Warden - 3 days for Mr Green

Could have 1st & 2nd May for closing or 2 days w/c 6th May

12th March 2019 - Ummant's witnesses

Latif - 2 main counters + 1 combi counter

↳ 2 members of staff + Latif Helen Barnett, Muhammad Tabassum

LA001 - Latif was ID
P.O. Manager

Ummantia Barnett + Muhammad Tabassum (Shop Manager). They would also balance the office

Tank - 1400hrs

Mr Tank - I didn't think that my first witness statement was evidence

13th March 2019 - Akash Patel

Simon Henderson cross-examines

NBSL Laps - row 147. Evidence reports requested by officer.
Officer claimed stock was overrunning themselves

(ESG)? ~~was~~ Possibly FS? 08/07 NBSL said L1720 was being investigated.

3/8/16 - row 155. Akash calls branch still wanting a call back.

ESG - support team for NBSL Tier 2 Ann Walker's team

Mrs Burke 1225pm 13/2 March 2019. O'Brien cross-examined

AB - confirmed retail had now closed also.

15 years as a bank worker in Spass.

Richard Roll - 1430hrs - Tony cross examined

Tony claimed 6 months training process before being let to work on the system.

Richard Roll - 70% on non manufacturing hardware I may be wrong.

→ in his role ~~but~~ had responsibility for the issue & resolution.

'marooned transactions' - potentially transactions stuck in hardware when branches closed & equipment removed.

Roll - agreed 70% was not spent on looking for bugs.

14/2 March 2019

Roll - claims that due to pressure to find the cause of the problem he sometimes closed the case without escalating to next tier within FS. This was then passed back to Post Office.

POB - This might mean that Post Office acted upon the information from FS that was ~~not~~ possibly incorrect.

Roll then changed his mind under cross-examination

Roll - claimed that his supervisor told him to close down the call even though Roll had highlighted the problem of incorrectly issued some laptops.

(May 7th & 8th - Closings - agreed by Judge)

Roll - claimed that incorrectly wired laptop for mobile post office went onto line. PS knew but kept it to themselves. Post Office would not have known about this hardware issue. Roll was in post 2001-2004.

19th March 2014 - Dawn Phillips

TCs - rename message
'Please be careful when entering transactions'

- Linkage between MBSC 'losses' disputed & the Agents Accounting Team. Gain-up between MBSC losses disputed & blocking the debt recovery process. Case Management - could there be a workflow introduced to ensure all info flows from the MBSC.

Tracy Mather 14:00pm

Credence queries
Genuine & credible in knowledge and answers
Keyness lines of answers/responses

Paul Smith 1600 hrs

20th March 2014 - Dame Johnson

F932 Mis-keyed Project possibilities study 15th May 2012

20/21st March - Torstein

F432 - Peak PC0152014 - Spm not aware of changes to transactions in bank

Question - has a scan of all documents been made against Peaks.

- ① Alimatis oppose?
- ② Skeleton
- ③ Date of hearing?

Witness statement for Andy Persons - page 6. set out

- (24) - Findings of CFI give clear impression already
- (25) - Content of Post Office
- Content of Post Office witness

→ Green claims lack of particularisation in application. Consequently they can form a view

W/C 26th March - Renewal Application

Tues -

Skeleton - Sat Mon 1st April

Hearing - Wed 3rd April

LRG Team Meeting - 27th March 2019

- PDR - Multiplier's for bonus have changed PDR 3 is now 0.75
↳ Need to communicate to team
- Emma-Rose Bomer - our HR lead. Sean Leech is leaving POC.

Financial Update

Income - strong performance. Trading profit actual £48.8m v
£39.5m target
+£9.2m 6.7%

LRG - broadly on track

Julie's paper
and time for
this

Litigation Update

- Appeal Judgment - procedural unfairness. Incorrectly applied the law
- Reversal - Weeks 3rd April

Fall out of Common Issues Judgment

- ↳ Issue new contract?
- ↳ Process for changing contract - Anita check that Zoe/Julie has the work ~~for~~ Sally did!
- ↳ 557 Claimants
- ↳ Other postmasters/claimants

Board / GE View - not directionally changing our strategy however need to accelerate Debbie's work.

Johann - critical period assessment of new policies & processes as Julie stands them up.

Paula learning:

- ① Govt approval for AI as interim CEO.
- ② Govt approval for new CEO.

↳ restructuring is a result

↳ interim FD

↳ Rob picks up Ops

↳ new CID to support.

If we want to be more like a franchise organisation how do we need to look (structure); behave (culture); operate (way of working).

LRG Customer Survey

— Jane would like to understand what our 'customers' think of us

Agenda

11

Intelligence Background

Outline of A Session

- ↳ Intro
- ↳ Background to litigation & witness proofing process

- Litigation - A background
 - where we are today
 - what comes next

- Witness Proofing Exercise

- Witness Support

↳ Best Self Training

↳ OIAssist Support

↳ Comms

Overarching - ~~Over~~ Comms Strategy

↳ Comms Meeting change to date

↳ Do & Don'ts

11 - 1230

Lunch 1230

- 1pm - Witness Support
- Best Self Training
- Court Familiarisation
- OIAssist
- Comms

1hr

230 - Q & As

23rd - Michael Johnson, Dawn Well, Patricia Lee, Andy Pearson ⑦

Anne Kane, Nicola Cook, Gillian ~~Hay~~ Hayland

30th - Mark Dinsdale, Tinaid Turner, Jackie Grace, Kendra,
Paul Davis, Alison Belcher, Karen Annis ⑦

Alise & Paula to meet
James Arbuthnot 28th Sun.

Pre-meet - 23rd Sun
9am.

Briefing - 16th Sun to
Martin Edwards
- to David by
14th Sun.

BIP

~~Scope~~ Purpose & Scope

Quick wins

Milestone plan

Review mechanism/
measurement metrics

Reliability of Horgen

- ① Finding is Horgen is reliable — Key is to reinforce the reliability ~~and~~ through robust process & the consequences of non-conformance.

↳ Develop end to end process

- ↳ Spar provides info (as requested by POL) of mine
- ↳ Checked against 'known mines/bugs' — Should this be public or portal
- ↳ investigation process
- ↳ enforce outcome of investigation findings
- ↳ consequences of non-conforming.

IT strategy - IT not fit for purpose, expensive & hard to change

↳ 300m approved by Board

↳ post-market centre view of change

Hardware - Bank Technology - refresh Hengis equipment in Network
Platform ↳ upgrade Hengis platform

Spot Remains 5

Abdullah

- Transaction data → PO has more info than poor spouse in branch
 - Attack credibility - could cover everything in witness statement -
 - T & E data - Transaction & event data (Available in branch)
Semin data
- were all within 60 or 42 days. Check each claimant.

◦ IT Change documents

Balance of work & benefit - many life easier for postmaster.

Speak to Rob - about Technology Strategy / Council:

High Risk Hierarchy - what was the risk?

Policy

① Credence data request - why default; ~~was~~ wouldn't it have been helpful. Providing the info

→ Policy specific → 26K stamps declared recently for a few days.

~~Parker 13/3/18 - 21/8/18~~ [Hanging Mail - 11th April 2019]

Stene Parker, Fujitsu. 1030am

• Green has given Parker a hard time on having 3 witness statements + WSD letter to Greeths on the Monday before Stene was originally scheduled to give evidence.

• Green - Through his questioning is looking to suggest that Stene was selective with the info he put in his witness statement - to suggest he is misleading court with his omission.

→ That Stene Parker is playing down Richard Rolfs level of knowledge, skill & expertise.

Deliberate decision to exclude information from his witness statement - to deviate from definition of bug. Green challenges Parker hard on this point. Stene claims from his experience that his explanation was appropriate. Green claims that Rolfs' recollection was correct. Stene sticks by his original spreadsheet to clarify work done by Rolfs.

Objectives

Trial 3 Preparation - Evidence Gathering & Witness Profiling

- Working with WBD (3x Managing Associates; 5x Associate solicitors; 7x Paralegals) identifying ~~relevant~~ ^{important} witnesses relevant to issues of breach & limitation for Abdullah & Shukla (the two selected lead cases for Trial 3)
- Gather & review/analyse ~~relevant~~ ^{relevant} documents (e.g. pleadings & court documents including witness statements) relating to Shukla & Abdullah
- Identify ~~relevant~~ ^{potential} witnesses
- Contact witnesses - existing & former employees - as part of ~~the~~ ^{the} profiling exercise. This exercise is partly sensitive due to the public impact of the Common Issues Judgment.
- ~~Arrange~~ ^{Provide} ~~specialist~~ ^{specialist} witness training for POL witnesses. Establish
- ~~Provide~~ ^{Provide} 'Witness Support Framework' ~~to~~ ^{to} ensure witnesses are of emotional & mental support pre, during & post trial.

Lead & direct team to undertake work (investigation & evidence gathering) in connection with GLO & Project-Sheriff ~~and~~

GLD Litigation Planning Meeting - 13th May 2019.

Reed, Ben Fort, Mark U, Zae B, Rawa, Herbert Smith - Allen Watts,
Kristin Maney, Tom Henderson.

Operational Update from Zae

- Contracts being issued weekly.
- Talking post judgment we are issuing existing contract with side letter acknowledging judgment.

Herbert Smith Admin for new 5 par contracts

- ① Do nothing no request changes
- ② Make light touch amendments to existing contract - to address some of the points in judgment

Options in light of appeal

- If we make changes to new 5 par contracts now does that go against us in terms of Appeal.
- We would only put in the terms implied terms that POA agreed to. Turn implied into actual i.e. ~~make~~ explicit terms. Make those agreed implied terms express.

TRIAL 3 — dependent on appeal however Judge could decide to 'stay' trial 3 or could look to proceed with trial 3.

- WBD is focusing on purchasing bank liabilities to Jan 2020. Anticipate results would favour this

PHA Board Meeting - 27th March 2019

- Approved. Interim FO role & recruitment for new Exec role.
- Board approval to be launched from April. Electronic feedback being set up.
 - ↳ 1:1s with Chris August / Sept.
 - ↳ Alan to come back Dec 19 meeting to discuss / review.
- 26th June Board meeting to start at 330pm. Update during
- People plan / considerations — need to put on agenda for Board discussion & agree forward plan.
- Tenants Panel — April 16th next meeting.
- LGBT+ — session at 
 - ↳ Met to set up session for Board Members. Need to consider cascade to staff members.

Trail 3 Prep - 4th April 2019
Sushma; Andy P; Mark Underwood

Trail 3 scheduled for 1st week Nov - 4 weeks + 1

① Disclosure - Deadline 26th April

→ CMC? Is one scheduled?

→ Documents from Royal Mail? - No agreement for Royal Mail to provide the documents requested by Freeths.

→ Document extraction. Update on progress?

ACTION - Sushma to send AVDS note on NBDC/Kendron

② Witness Statements - 13th Sept Deadline.

→ Names of WBO team allocated to this trial? - Sushma.

→ 6 lead claimants broader preparation - on hold until when?

→ Continuing witnesses - update on timeline?
AVDS to reach out first & then letter follow-up.

→ Update witness list to show relevance of witness to claimant

- Pre 2012 information / data extraction for witnesses — what is the extent of the note to POL?
- Murren's extraction for 35 key witnesses — update on extraction progress?
- Witnesses — feedback from Kate & Shirley? Update from WBO?

Costs

Timeline of Abdullah & Shabir from start to finish

- Set out key headings
- Call out good areas / periods / performance
- All data for the period
- Analyse all data & ~~per~~

Policy/Business Governance - learnings from GLU Meeting 6th April 2019
Elizabeth Adams, Policy Manager.

- Explain your role

- Reporting structure

- Objectives

- Relevant experience

Catch Up with Mark Underwood - 4th April 2019

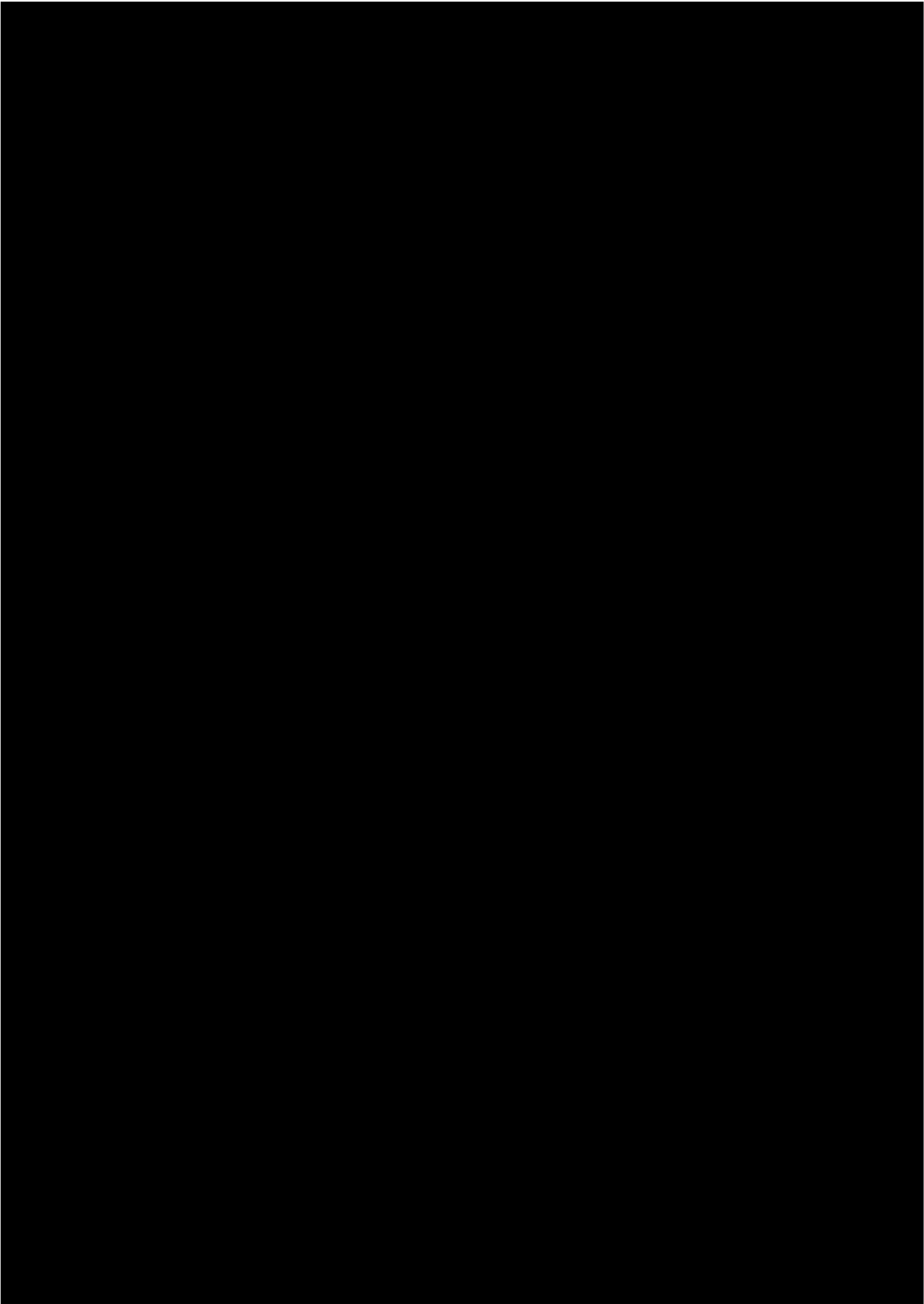
- Settlement Framework - update on progress / meeting with WSD.

- Municipal - extraction approach in place now? All done!

- Budget 19/20

- Contingency Planning - where are we?

- ↳ Independent advice from WSD



Forward Plan
Team structure

Litigation Team Catch Up - 5th April

• Trial 3 Preparation

↳ Abdullah & Shabir Tinehni

↳ Set out key headings

↳ List out good areas / points / for / forward

↳ Analyse all data for that timeline

↳ KDS; BIMs; any characteristics of known bugs

• Trial strategy & prep - Sushma & Team

↳ Witness approach

↳ Weekly catch ups with Sushma

↳ Meeting Thursday next week to agree strategy & ways of working

• PDRs

• Team workshop to BDD.

• Contingency Planning - Shukla & Anika

SSRT Investigation Report Format - update on show man.

What does the worst judgment look like? What are the implications? What can we do operationally to mitigate the impact? What can we do to amend the ^{Hangin} system?

Hangin Issue Judgment ~~Adverse~~ Contingency Planning - 8/2 April 2019

2. The operational impact of an adverse judgment

→ Pre & Post Hangin System Issues

→ kind approaches would be necessary to be established

→ Patrick - outlining the catastrophic consequences of an adverse judgment.

Workshop - to assess implications of worst case scenario events of the Hangin Issue.

Continued implications with Fujitsu/suppliers

What's in process for with Ops for common sense judgment response.

Hangin path - all contingency plan by June detailed plan in place early May.

→ need to map out time frames / phases. Implementation plan needs to go soon after

→ findings of fact are difficult to appeal. Therefore realistic view is that the Hangin judgment will be unappealable.

Project plan to be in place - Mark Underwood

Reb - IT perspective

Mark / Patrick - human perspective

3. - Operational perspective

Need to appoint programme director to lead business - wide approach - needs to include all stakeholders.

PDR with Time 9/14 April 2019

- Rule going forward

- ↳ Objectives

- Litigation Team Rules

- ↳ Constraints / SAs.

GRO

GRO

#

Tom Cooper -

Unsubstantiated narrative: why does Post Office think it's right

to leave:

not acting surprised how new moves you're finally leaving Post Office
2 like that attempt you're
or 2 days ~~up~~

After 33 years ~~of working together~~ it won't quite be the same without you. During this time whilst ~~you~~ ~~le~~ ~~me~~ haven't always worked together.

Since you first came ~~to~~ ~~to~~ to On coming to work with me ^{after} ~~when you~~ left. The thing, although even though you didn't technically support me for all of that period, I always regarded you as part of my team.

Even though you haven't technically worked ~~with me~~ ^{for me} ~~for the~~ as part of my team for the last few years I have always regarded you as part of my team. So it won't quite be the same without you.

Litigation Catch-up Call - 18th April 2019

- Claimant's summary reports

- ↳ Needs to be a narrative rather than a statement of facts
- ↳ Para on POL's view on cause/potential cause of losses

- Trial 3 witnesses

- ↳ High priority witnesses — to be contacted by phone by AVDB & then followed up with letter. Trial Mng complete
- ↳ Introductory workshop — 1 in London + 1 in Chesterfield w/C G H Mng AVDB & WSD proofing team.
- ↳ Proofing timeline — Individual witness proofing to start w/c 13th May

GRO

GRO

#

Jane's Lead Team - 24th April 2019 - [unclear]

- o Announcement on Time - will be sent later today. LRG Lead team to see this before Comms sent.

Tim - Prob

Jenny - CFO.

Tobias - CFO.

Veronica & Jono - stay in Legal with Ben Foot.

Mark - ?

Angela -

Women in LRG - 1st May 2019.

Jane's overview:

Focus on the important things & learn to let go of the less important things.

Perfectionism creates stress - being organised at home and in work ~~allows~~ facilitates a less stressful situation.

How much stress do we create for ourselves? How can we help ourselves, what can we do to de-stress the situation.

OK Assist - Hazel McCallum

Identifying Stress & Building Resilience

Resilient people unstable but don't fall down.

Event + Response = Outcome

Why we sleep
Book to read.

Something happens
We ^{can} choose how we respond to the event.
What happens / how we feel as a result.

Choose the best response for you to give you the best outcome.
Consider different responses.

The Confidence Lockdown = Ross Taylor

Confidence at work - book

↳ Being confident in your own skin

↳ ~~Being~~ Knowing who you are & being comfortable with yourself.

'Knowing the words to the song'

Follow your own recipe

Stir with passion

Chill

Add Zest

Rectangle

Circle

Personal Profile

Box - Organised

Triangle - who to be in charge

Rectangle - at a crossroads; anticipating change

Circle - people person

Square - creative

Brand You

- Car - classic jaguar ~~and~~ convertible. ^{ready to} Super fast, stylish, joyful
- Colour - ~~white~~ cream. Pure, unadorned, light & airy. ^{the opportunity.}
- Confectionery - carrot cake. Healthily indulgent.
- Cocktail - Champagne. ~~New~~ New drink perfection

The power minute

The 5 minute break

The 15 minute lunch

T & S Catch Up - Anita & Rachel 2nd May 2019

- Hotels + above up direct bookings. Need to see exceptions report & write to claimants & have manager of off-policies.
→ Needs to be reviewed monthly.

- Other Travel related claims - off policy exceptions reporting & process.

- 10% sample checks

- Travel App Reporting - frequency of data upload? Anita to query with MI team? Emma?

GLO Weekly Catch-up with Legal Team - 2nd May 2019

16th May - permission to appeal Common Issues Judgment. Court session

7th May - draft^{grounds} of Common Issues appeal & Skeleton.

↳ 14th May presented to Court. - lighter draft grounds

9th May - Board Sub-Committee. Get approval on draft grounds & skeleton

Zoe - Contracts workshop w/c 14th May 2019

• Establish why we are looking to delete or rename?

↳ Retention periods

Training - Anita's Observation

- Video from CEO or Retail CEO to welcome to the business
 - ↳ Support structure - org chart with photos of their 'named' area manager

Balancing - Dealing with Discrepancies

Kath & Shirley
Early morning signs
in branch

- BTS - emphasize that Receipts + Payments need to be the same figure
- Need to review the loss + gain slides / notes with legal team

Putting their branch into the Post Office Central

- ↳ Show what happens to the data / transaction when they are processed in branch → FSC settlement with debit TCs - what they are and what they do.

Hugin System - what it is & what it does

- ↳ I'd like guide to the equipment
- ↳ Hugin Receiving Process - the receipts & how to understand them.

Kath / Shirley + work with PS in improving the methods on the documented service receipts & Recovery receipts

On-site training review - Anita with Kath & Shirley

Image → Own the conversation
Subject Knowledge

Presentation Skills

Witness Briefing Seminar

Band 5000 - include in pm stat.

Feedback for witnesses
included

Expenses - Author with pm, it cost center code

Press - Mel will put this up

Tues 14th Apr 1330 return Norway in air
0555 Gotville - JPK 0900.

Fri 17th Apr
1115

This guide has been put together to help ~~is a~~ ~~hand's~~
good practice in aimed at helping you operate an efficient
Post Office

should
The points below if followed at all times ~~will~~ help you
~~run your~~ with the day to day running of your branch, and
make it easier to pinpoint when things may have gone wrong.

lin. notebook
Peter Myleschreest

GRO

Chair Role

- Stakeholder / Welsh Govt -
- Support for Kieren, CEO - succession plan
- Board is getting stronger. But needs development - personal development

Rob's 2 worries:

① 22 bugs - if we focus too much on these Cayne will claim with more time he would fix more.

→ 22 prove we follow a standardised approach

Point (3 or 4) — demonstrate our 'normal' approach.

② System is a living system. Patches are put in to update / correct things. System gets better all the time.

→ introducing changes can result in 'problem' if not tested properly.

2015 - changed support model i.e. outsourced to ATOS. This created issues - reference data errors etc.

Choose 'bug' bank to latest release. System performs according to its input.

Default on Remote Access point — AVOS is read.

Risk mitigation into Post Office line

↳ ① Draw distinction between 'old' & 'new' system. If Judge finds old system is less robust ^{than} 'new' system prior to 2010.

③ Investigate further evidence from JT — needs to be consistent.

④ Taking care in opening to keep our evidence tight to protect our case! Post Office's will be significantly less than ~~document~~

ACTIONS

① Post Office Contingency Planning Session at later date with Board Sub-committee.

AVDB, JT, CH, Mel C, Paul

② *Tim Parker wants a briefing on Tues 26 Feb 2019*

→ Get a sense from the list of the participants → this will inform the scope & depth of contingency planning.

③ Lemma Q & A — circulate to Board Sub Committee

model relies on Hargis being robust.

Post Office position can only be sustained if Hargis is robust.

② Witnesses

→ Quality of evidence will be important

→ Warden relies on statistical analysis - underpinned by mathematics. More maths than we would like but 'witness' is expert & independent. He will be cross-examined. Report does however contain qualitative information

→ FS evidence ~~has~~ has been unreliable through witness statements. We've had to serve corrective statements. Issue is legacy Hargis so FS no longer have the people in place to ~~do~~ respond.

Dispute has happened through witness statements. Parallel process has not helped.

FS witnesses might be shaky under cross-examination. This potentially will give Judge scope/leverage to find against Post Office.

③ Remote Access

Comments will try to spin conspiracy theory. On robustness since Remote Access is a complete Red Herring!

Conspiracy theory. Post Office & FS position has changed over time - No remote access → add transactions but not editing → after Deloitte, FS admitted that remote access is possible by ~~the~~ ^{sup} ~~user~~ ^{user}.

No evidence of widespread data manipulation.

Core argument - not proving Horgan is perfect & doesn't have bugs

↳ Majority of cases Horgan is robust

↳ Post Office & Spurs starting position is that Horgan is sound

Good or Very Good

This is Post Office
case

County measures are good. When things go wrong Horgan & supporting measures work to correct.

although on ^{rare instances} ~~but~~
not been triggered

Claims Case - There could be 1000's of other bugs that might not have been detected.

Warden - even the bugs there are the impact of them would have nowhere near the level of losses claimed.

Coyne - doesn't readily offer a view on robustness of Horgan.

↳ 22 bugs being currently investigated by FS & WBS with POL.

3 Internal Risks

① Bar we've set ourselves is high. Horgan is robust. Post Office's operating

Board Sub-Committee - 21st February 2019.

Hongin Issues Trial - Update from Tony Robinson QC.

15 Abstract Issue

Civil disputes are settled / win on balance of probability

- (1) Hongin Robust
- (2) PS Security manipulating data behind the scenes
- (3) Reporting functions of Hongin

(1) Evidence supports robustness of system

Judge may say would be improved

Tony's view - Layne is looking to find fault rather than a view of Hongin

Recovery process by Post Office

Judge is a risk
Tony's View

Battle

→ Tony to keep the Judge focused.

→ Judge is unlikely open to criticism Post Office

Threat from Comments

Remote Access of system

Post Office hasn't disclosed relevant documents

Account Need to see Deloitte's work.

Conf Call - IT Focus 1812 Feb 2019.

Rob Houghton, Paul Williams, Tony Robinson, Simon Henderson, Omerin Dwyer,
Tommy Embler, Lucy Bremner, Andy Parsons

Coyne 2 - got Rob seemingly worried as he could only ~~see~~ see one side of the ~~argument~~ argument. Pragmatic report but context.

Counting road journeys - user has gone off path / normal route.

Triangulation - what did Post Office do i.e. the recovery.

Rob felt more comfortable after reading the FS responses.

→ Andy has gone back to FS to get better response on those ones claimed as weak.

Warden - seems to like statistical analysis that potentially loses the audience. Warden is a Psychiatrist!

22 Bugs - what is the extent & scope of the problem? POI view is that it is quite limited/marginal.

Scale of losses can be nowhere near the extent of losses being claimed by claimants.

Can we dismiss ^{any} ~~and~~ Horizon System issues before we ~~conclude~~ concluded the individual cases

4 Bugs — Dalmellington