

Message

From: Simpkins, John [GRO]
Sent: 15/10/2019 13:39:48
To: Lenton, Matthew [GRO]; Parker, Steve [GRO]
CC: Wright, Mark [GRO]; Newsome, Pete [GRO]
Subject: RE: KEL Disclosure: Mark's comments on 7 and 8
Attachments: List_ALL_KELs.java; List_Recent_KELs.java; List_Deleted_KELs.java

Obfuscated version of the KEL scripts attached.

Regards
 John

From: Lenton, Matthew [GRO]
Sent: Tuesday, October 15, 2019 2:09 PM
To: Parker, Steve [GRO]; Simpkins, John [GRO]
Cc: Wright, Mark [GRO]; Newsome, Pete [GRO]
Subject: RE: KEL Disclosure: Mark's comments on 7 and 8

I think we might argue that the original statement was wrong and based on a misunderstanding, and that it has been known to all parties for a long time that the deprecated / superseded versions of non-deleted KELs are available, but we were never asked for them until recently.

1. Contrary to what I said earlier, it looks like I did eventually understand the correct meaning of "deprecated" and did explain what it means to WBD – see the attached email from Feb 2019 "RE: Peaks / KELs...", point 4 in my email further down in the chain.

Although they acknowledged the email, it's not quite clear if they picked up on the significance, and certainly didn't come back and ask us for the deprecated KELs, but that statement at point 4, and also in the next email down from me in that chain where it says

"The KELs listed below are all deleted rather than deprecated or archived, and are therefore not retrievable"
 does imply that deprecated (/superseded) KELs are retrievable.

2. It is also stated in SVM/SDM/PRO/0875 section 11.2.4, last bullet:
Updates to existing KELs can be made by anyone with access to the KEL system.
 - *There is no requirement to update a KEL with a new Peak number simply because another incident has been seen for an unresolved issue. Counting this type of incident is the function of HSD master call processes.*
 - *KELs should be updated with workaround or resolution details as soon as they are available.*
 - *KELs should be updated with the details of a baseline when generated by 4th line*
 - *KELs should be updated with details of when a resolution was delivered to the live estate. KELs should not be deleted under these circumstances since code regression may occur later.*
 - *All KELs have version numbers, it is always possible to view a previous version and highlight the differences between versions.*

When a KEL is updated it will need to be authorised again. The old version of the KEL is still visible until the authorisation has taken place.

3. Jason Coyne's report of October 2018 doesn't quite acknowledge an understanding that versions co-exist:

4.89 Information on the KEL is updated by all levels of support as work to resolve the incident progresses. Any creation or update of a KEL must be authorised by SSC before it can be seen by all users.

There is however evidence in the report that he read SVM/SDM/PRO/0875 as it is referenced in footnotes 32, 35, 238, and at least some of paragraphs 4.87 to 4.89 seem most likely to be based on section 11.2 of SVM/SDM/PRO/0875 (doesn't seem like it could come from anywhere else).

4. The email with the EDQ as I sent it back to them with my comments is also attached ("RE: Legally Privileged..."), the relevant statement is in the right hand column in the first row; I didn't comment on it and in fact they only asked for comments on the yellow bits. Note we were only given a few hours to turn this around. You can see the WBD email requesting the comments below my email, wording seems to have resulted from a meeting. I think it looks like a misunderstanding.

Matthew Lenton
Document Manager
Post Office Account

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From: Parker, Steve [REDACTED]
Sent: Tuesday, October 15, 2019 11:11 AM
To: Lenton, Matthew [REDACTED]
Cc: Wright, Mark [REDACTED]; Simpkins, John <[REDACTED]>
Subject: FYI: KEL Disclosure: Mark's comments on 7 and 8

Mark's comments on 7 and 8. John is still working on the rest.

Where Mark says "KB system was changed to **reduce/hide** the extra info" some additional clarification might be helpful. The technique is sometimes referred to as "folding" and is intended to take superfluous information out of view unless the user specifically requires it when it can be simply revealed.

Steve

From: Wright, Mark <[REDACTED]>
Sent: Tuesday, October 15, 2019 10:56 AM
To: Parker, Steve [REDACTED]; Simpkins, John <[REDACTED]>
Subject: RE: KEL Disclosure

7. I'm sure I would have gone through the versioning as it appeared on the screen and I explained everything about how the system was used, however I cannot categorically say that I did.

8. I think that the demos were done before the KB system was changed to reduce/hide the extra info so am pretty sure the previous version links were shown at the bottom of the page.

Chris Jay, a representative from WBD and Pete Newsome were also there on the first meeting. Pete Newsome and possibly Dave Ibbett were there on the second.

Pete arranged both meeting so he should remember who attended.

Cheers,

Mark.

From: Parker, Steve <[REDACTED]>
Sent: Tuesday, October 15, 2019 10:40 AM
To: Simpkins, John <[REDACTED]>
Cc: Wright, Mark <[REDACTED]>
Subject: FW: KEL Disclosure

From: Amy Prime <[REDACTED]>
Sent: Tuesday, October 15, 2019 9:16 AM
To: Lenton, Matthew <[REDACTED]>
Cc: Andrew Parsons <[REDACTED]>; Jonathan Gribben <[REDACTED]>; Katie Simmonds <[REDACTED]>; Newsome, Pete <[REDACTED]>; Godeseth, Torstein <[REDACTED]>; [REDACTED] <[REDACTED]>; Parker, Steve <[REDACTED]>; Lucy Bremner <[REDACTED]>
Subject: KEL Disclosure

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 responses 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?
6. 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?
8. 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 web conference demo to show WBD how new versions of a KEL are generated and how previous versions of the KELs are viewed? We can be available on Wednesday after 2pm, or on Thursday after 11am.

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

Amy Prime

Associate
Womble Bond Dickinson (UK) LLP



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