

Message

**From:** Simon Henderson [REDACTED] **GRO**  
**Sent:** 30/01/2019 11:23:42  
**To:** Jonathan Gribben [REDACTED] **GRO**; Anthony de Garr Robinson [REDACTED] **GRO**  
**CC:** Andrew Parsons [REDACTED] **GRO**  
**Subject:** RE: Parker 2 [WBDUK-AC.FID27032497]

Jonny

I'm not sure that I do. We obviously need to make a correction and I think we are already in damage limitation territory. But it will be hugely embarrassing if we need to make a further correction or corrections. We need to find out the accurate position as a matter of extreme urgency and if this involves getting senior people from FJ and/or PO to get involved from on high, my feeling is that is the right approach

Best  
Simon

---

**From:** Jonathan Gribben [REDACTED] **GRO**  
**Sent:** 30 January 2019 11:17  
**To:** Simon Henderson <[REDACTED] GRO>; Anthony de Garr Robinson [REDACTED] **GRO**  
**Cc:** Andrew Parsons [REDACTED] **GRO**  
**Subject:** RE: Parker 2 [WBDUK-AC.FID27032497]

Simon,

We need to get to the bottom of which bank accounts did PO support deposit facilities for. We are making enquiries of Post Office.

FJ didn't mention savings accounts, ISAs etc. when we put the question to them. I will ask them to confirm the position now.

I don't think we will get to the bottom of this quickly. In the circumstances, do you agree with our suggested approach?

Kind regards

Jonny

**Jonathan Gribben**  
Managing Associate  
Womble Bond Dickinson (UK) LLP



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**From:** Simon Henderson [REDACTED] **GRO**  
**Sent:** 30 January 2019 10:53  
**To:** Jonathan Gribben; Anthony de Garr Robinson ([REDACTED] **GRO**)  
**Cc:** Andrew Parsons  
**Subject:** RE: Parker 2 [WBDUK-AC.FID27032497]

OK but what other bank accounts did PO support deposit facilities for? If the only account anyone ever used the PO to make a deposit into was a Giro account, all well and good but is that right? Even if no deposit could be made into 3<sup>rd</sup> party bank accounts (i.e. NatWest etc) the PO (at least today and I imagine at the relevant time) offers all sorts of savings accounts, ISAs etc. Could FJ have inserted transactions which had the effect of making deposits into (i) 3<sup>rd</sup> party accounts or (ii) PO accounts? If not, why not?

Best  
Simon

---

**From:** Jonathan Gribben [REDACTED] **GRO**  
**Sent:** 30 January 2019 10:48  
**To:** Simon Henderson <[REDACTED] **GRO**>; Anthony de Garr Robinson ([REDACTED] **GRO**)  
[REDACTED] **GRO**  
**Cc:** Andrew Parsons { [REDACTED] **GRO**}  
**Subject:** RE: Parker 2 [WBDUK-AC.FID27032497]

Simon,

Based on FJ's comments this morning, it looks like the statement that a Giro transaction was a type of PO transaction that was different from any other payment to a bank may not be correct, which is why we are proposing to remove the full footnote.

Based on FJ's current comments it appears that a SSC user could inject a transaction into a Giro bank account and any other bank accounts that PO supported deposit facilities, but there would be a paper trail. We need to confirm this with Post Office and I suspect that will take some time, hence the suggestion to remove the footnote and prepare a paper to cover off the point.

Let me know if you want to discuss.

Kind regards

Jonny

**Jonathan Gribben**  
Managing Associate  
Womble Bond Dickinson (UK) LLP

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m: [REDACTED]  
t: [REDACTED]  
e: [REDACTED]

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**From:** Simon Henderson [REDACTED] **GRO**  
**Sent:** 30 January 2019 10:38

**To:** Jonathan Gribben; Anthony de Garr Robinson GRO  
**Cc:** Andrew Parsons  
**Subject:** RE: Parker 2 [WBDUK-AC.FID27032497]

Jonny

This is obviously very concerning. Before we fire off any letter, we need to be absolutely sure we have now got things right. If it is right that Giro was a standard EPOSS transaction and that FJ could have injected a Giro transaction, doesn't it also follow that FJ could have injected a transaction to any bank account? If so, that is a drastic departure from Parker 1 and 2. The paper trail point may help but it doesn't solve the fundamental issue. Parker 2 presently says that a Giro transaction was a type of PO transaction that was different from any other payment to a bank. Is that correct or not?

Best  
Simon

---

**From:** Jonathan Gribben GRO  
**Sent:** 30 January 2019 10:30  
**To:** Anthony de Garr Robinson GRO <GRO>  
**Cc:** Simon Henderson <GRO>; Andrew Parsons GRO >  
**Subject:** Parker 2 [WBDUK-AC.FID27032497]

Tony,

Yesterday FJ informed us that a Giro bank is also an AP transaction (like bill payments) - it is the only type of bank account that is and all other banking deposits go through a totally different path. We included it as a footnote to Steve's statement (para. 35). FJ have now told us that Giro Bank Transactions are not AP, but standard EPOSS Transactions and that prior to online banking (introduced in 2003), POL did support some (but not all) other banks with deposit and cheque cashing facilities which were also EPOSS transactions. They think that there was also a paper trail for those transactions too (so they would be detectable during Post Office's reconciliation processes) and we will pick this up with POL to confirm, but the immediate point is that we need to provide a replacement version of Steve's statement with the footnote referred to above removed. Our suggestion is to send Freeths a version without the footnote by email as follows:

"Dear Sirs,

It has come to our attention that the witness statement we provided yesterday contained a footnote in error. Please find attached a replacement version.

Yours faithfully"

We will then produce a paper to bottom out the above points.

Please let me know if you agree with this approach.

Kind regards

Jonny

**Jonathan Gribben**  
Managing Associate  
Womble Bond Dickinson (UK) LLP

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**Simon Henderson**  
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**From:** Gareth Jenkins    
**Sent:** 30 January 2019 07:22  
**To:** [pete.newsome](#)  [Christopher.Jay](#)  [Legal.Defence](#)  Jonathan Gribben  
**Cc:** Andrew Parsons; [Dave.Ibbett](#)   
**Subject:** RE: SP Second Witness Statement: Possible examples to use - effective software fixes

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Hi Jonny,

Sorry, but you didn't send me the actual question until I'd gone off line around 4ish yesterday, so other than the phone call I had from Pete, I didn't see the emails until late last night.

A further clarification:

1. The Giro Bank Transactions are not AP, but standard EPOSS Transactions. I don't know how info on them got to Giro Bank – it may well be that Giro Bank worked off the paper trail and then sent summaries to POL which they then reconciled with the Horizon feed. POL would need to provide the details.
2. Prior to online banking (introduced in 2003), POL did support some (but not all) other banks with deposit and cheque cashing facilities. Again these were EPOSS (not AP) transactions. I assume that there was also a paper trail here and it would work in a similar way to Giro Bank. Again it is POL that need to define the process. All Horizon did was provide the buttons to record the electronic part of the transaction.

Is there any point in me re-reading Steve's statement? I'm out this morning, but could do so this afternoon.

Hope this helps.

Best wishes

Gareth

---

**From:** [pete.newsome@\[REDACTED\]](mailto:pete.newsome@[REDACTED]) **GRO**  
**Sent:** 29 January 2019 19:45  
**To:** [Christopher.Jay@\[REDACTED\]](mailto:Christopher.Jay@[REDACTED]) **GRO**; [Legal.Defence@\[REDACTED\]](mailto:Legal.Defence@[REDACTED]) **GRO**; [jonathan.gribben@\[REDACTED\]](mailto:jonathan.gribben@[REDACTED]) **GRO**  
**Cc:** [andrew.parsons@\[REDACTED\]](mailto:andrew.parsons@[REDACTED]) **GRO**; [Dave.Ibbett@\[REDACTED\]](mailto:Dave.Ibbett@[REDACTED]) **GRO**; [gi.jenkins@\[REDACTED\]](mailto:gi.jenkins@[REDACTED]) **GRO**  
**Subject:** RE: SP Second Witness Statement: Possible examples to use - effective software fixes

Jonny

I read out the questions and then interpreted Gareth's answers into my own words.

Pete

Sent from my Android phone using Symantec TouchDown ([www.symantec.com](http://www.symantec.com))

-----Original Message-----

**From:** Jonathan Gribben **GRO**  
**Received:** Tuesday, 29 Jan 2019, 17:33  
**To:** Newsome, Pete **GRO**; Jay, Christopher **GRO**; Defence Legal (Chris Jay,) **GRO**  
**CC:** Andrew Parsons **GRO**; Ibbett, Dave **GRO**; Gareth Jenkins **GRO**  
**Subject:** RE: SP Second Witness Statement: Possible examples to use - effective software fixes

Pete,

Thanks. When you say you have had to interpret, do you mean interpret my email and/or what Gareth has said, or do you mean you passed on my email and Gareth confirmed that it is correct?

Kind regards

Jonny

**Jonathan Gribben**  
Managing Associate  
Womble Bond Dickinson (UK) LLP

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**From:** [pete.newsome@](mailto:pete.newsome@)

GRO

**Sent:** 29 January 2019 17:22

**To:** Jonathan Gribben; [Christopher.Jay@](mailto:Christopher.Jay@) GRO; [Legal.Defence@](mailto:Legal.Defence@) GRO [h](#)

**Cc:** Andrew Parsons; [Dave.Ibbett@](mailto:Dave.Ibbett@) GRO [i](#); Gareth Jenkins

**Subject:** RE: SP Second Witness Statement: Possible examples to use - effective software fixes [WBDUK-AC.FID27032497]

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Jonny

I talked to Gareth and the answer is below. I have had to interpret as Gareth was not able to send a response.

Pete

Pete Newsome  
Account Manager  
DHL and Post Office Account, Fujitsu UK&I  
Tel: [01928 502222](tel:) GRO  
E-Mail: [pete.newsome@uk.fujitsu.com](mailto:pete.newsome@uk.fujitsu.com)  
Web: <http://uk.fujitsu.com>  
Web: [uk.fujitsu.com](http://uk.fujitsu.com)

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**From:** Jonathan Gribben <[GRO](#)>  
**Sent:** Tuesday, January 29, 2019 5:04 PM  
**To:** Newsome, Pete <[GRO](#)>; Jay, Christopher <[GRO](#)>  
**Cc:** Andrew Parsons <[GRO](#)>; Ibbett, Dave <[GRO](#)>  
**Subject:** RE: SP Second Witness Statement: Possible examples to use - effective software fixes [WBDUK-AC.FID27032497]

Yes it has been sent to Gareth, but it is:

How is it possible for SSC to inject a GIRO bank transfer into a set of branch accounts but it isn't possible to inject another bank deposit? Gareth's answer Giro Bank paying in was possible into accounts by AP as it was introduced before on line banking so you needed was the account number and detailed knowledge of the system so theoretically it was possible. But there was a paper work trail to back this up that the sub-postmaster had to send in to POL which should then reconcile to the AP transaction file from Horizon. (Post Office would understand how it worked). A report was produced daily to reconcile against the Horizon feed, any discrepancy Post Office may find where the paper work was not present would be discussed with the branch at the time. Post Office can describe what would happen if the paperwork was not available.

Steve thinks the answer is:

I think the answer is that Giro bank is also an AP transaction (like bill payments). It is the only type of bank account that is. All other banking deposits go through a totally different path. There may have been other banks who had similar facilities before on line banking was introduced in 2004? but you would have to ask Post Office as they were AP transactions.

Thanks

Jonny

**Jonathan Gribben**  
Managing Associate  
Womble Bond Dickinson (UK) LLP



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**From:** [pete.newsome](mailto:pete.newsome) <[GRO](#)>  
**Sent:** 29 January 2019 16:59  
**To:** Jonathan Gribben; [Christopher.Jay](mailto:Christopher.Jay) <[GRO](#)>  
**Cc:** Andrew Parsons; [Dave.Ibbett](mailto:Dave.Ibbett) <[GRO](#)>  
**Subject:** RE: SP Second Witness Statement: Possible examples to use - effective software fixes [WBDUK-AC.FID27032497]

Hi

What is the question? Has it been sent to Gareth already?

Pete

Pete Newsome  
Account Manager  
DHL and Post Office Account, Fujitsu UK&I  
Tel: [GRO](#)  
E-Mail: [GRO](#)  
Web: <http://uk.fujitsu.com>  
Web: [uk.fujitsu.com](http://uk.fujitsu.com)

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**From:** Jonathan Gribben <[jonathan.gribben@GRO](mailto:jonathan.gribben@GRO)>  
**Sent:** Tuesday, January 29, 2019 4:58 PM  
**To:** Newsome, Pete <[pete.newsome@GRO](mailto:pete.newsome@GRO)>; Jay, Christopher <[Christopher.Jay@GRO](mailto:Christopher.Jay@GRO)>  
**Cc:** Andrew Parsons <[andrew.parsons@GRO](mailto:andrew.parsons@GRO)>  
**Subject:** RE: SP Second Witness Statement: Possible examples to use - effective software fixes [WBDUK-AC.FID27032497]

Pete,

Steve has signed his statement and we are holding it subject to one point that Gareth Jenkins needs to check. Can you make contact with Gareth and ask him to do that ASAP please?

Kind regards

Jonny

**Jonathan Gribben**  
Managing Associate  
Womble Bond Dickinson (UK) LLP

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**From:** [pete.newsome@GRO](mailto:pete.newsome@GRO) [h](#) [GRO](#)  
**Sent:** 29 January 2019 16:49  
**To:** Jonathan Gribben; [Christopher.Jay@GRO](mailto:Christopher.Jay@GRO)  
**Cc:** Andrew Parsons  
**Subject:** RE: SP Second Witness Statement: Possible examples to use - effective software fixes [WBDUK-AC.FID27032497]

Jonny

Is available for a call now. Try his mobile. 5.30 is when he needs to stop.....

Pete

Pete Newsome  
Account Manager  
DHL and Post Office Account, Fujitsu UK&I  
Tel: [GRO](#)  
E-Mail: [GRO](#)  
Web: <http://uk.fujitsu.com>  
Web: [uk.fujitsu.com](http://uk.fujitsu.com)

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**From:** Jonathan Gribben [GRO](#) >  
**Sent:** Tuesday, January 29, 2019 4:41 PM  
**To:** Jay, Christopher <[GRO](#)>; Newsome, Pete <[GRO](#)>  
**Cc:** Andrew Parsons <[GRO](#)>

**Subject:** FW: SP Second Witness Statement: Possible examples to use - effective software fixes [WBDUK-AC.FID27032497]

Chris, Pete,

We are close to finalising Steve's statement and it really needs to go today, but he is saying he isn't available after 5:30. Would you be able to speak to him to explain the importance of this please?

Kind regards

Jonny

**Jonathan Gribben**

Managing Associate

Womble Bond Dickinson (UK) LLP

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**From:** ParkerSPc <GRO>  
**Sent:** 29 January 2019 16:27  
**To:** Jonathan Gribben  
**Subject:** RE: SP Second Witness Statement: Possible examples to use - effective software fixes

No, can't be available after 5:30

---

**From:** Jonathan Gribben <GRO>  
**Sent:** Tuesday, January 29, 2019 4:21 PM  
**To:** Parker, Steve <GRO>  
**Subject:** RE: SP Second Witness Statement: Possible examples to use - effective software fixes

Steve,

I should have said, we really do need to get this out today. Are you available this evening?

Thanks

Jonny

**Jonathan Gribben**

Managing Associate

Womble Bond Dickinson (UK) LLP

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**From:** Jonathan Gribben  
**Sent:** 29 January 2019 16:13  
**To:** 'ParkerSP' [REDACTED] GRO  
**Cc:** [Matthew.Lenton](#) [REDACTED] GRO; [Dave.Ibbett](#) [REDACTED] GRO; Lucy Bremner; [John.Simpkins](#) [REDACTED] GRO; Andrew Parsons  
**Subject:** RE: SP Second Witness Statement: Possible examples to use - effective software fixes [WBDUK-AC.FID27032497]

Steve,

Thank you for this. Updated version attached. We are down to one point to bottom out, which is the GIRO bank theory in para. 35. The bit we are struggling with is that if it is possible to deposit money in a Giro bank account, how is it not possible to deposit money in a normal account. Why is a paper slip necessary for this type of account?

It might be worth having a quick call on this. Are you free?

Kind regards

Jonny

---

**From:** [ParkerSP](#) [REDACTED] GRO  
**Sent:** 29 January 2019 14:47  
**To:** Jonathan Gribben  
**Cc:** [Matthew.Lenton](#) [REDACTED] GRO; [Dave.Ibbett](#) [REDACTED] GRO; Lucy Bremner; [John.Simpkins](#) [REDACTED] GRO; Andrew Parsons  
**Subject:** RE: SP Second Witness Statement: Possible examples to use - effective software fixes [WBDUK-AC.FID27032497]

Latest comments / change marked

Steve

---

**From:** Jonathan Gribben [REDACTED] GRO  
**Sent:** Tuesday, January 29, 2019 12:07 PM  
**To:** Parker, Steve [REDACTED] GRO  
**Cc:** Lenton, Matthew [REDACTED] GRO; Ibbett, Dave [REDACTED] GRO; Lucy Bremner [REDACTED] GRO; Simpkins, John [REDACTED] GRO; Andrew Parsons [REDACTED] GRO  
**Subject:** RE: SP Second Witness Statement: Possible examples to use - effective software fixes [WBDUK-AC.FID27032497]  
**Importance:** High

Steve,

Please see attached the updated version of your statement and a comparison showing the changes made.

Can we discuss the comments at 2:00pm please?

Kind regards

Jonny

**Jonathan Gribben**  
Managing Associate  
Womble Bond Dickinson (UK) LLP

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**From:** ParkerSP@GRO  
**Sent:** 29 January 2019 10:52  
**To:** Jonathan Gribben  
**Subject:** RE: SP Second Witness Statement: Possible examples to use - effective software fixes [WBDUK-AC.FID27032497]

Yes, will do

---

**From:** Jonathan Gribben GRO  
**Sent:** Tuesday, January 29, 2019 10:40 AM  
**To:** Parker, Steve GRO  
**Cc:** Lenton, Matthew GRO n>; Ibbett, Dave GRO GRO >; Lucy Bremner GRO  
GRO >; Simpkins, John GRO GRO >; Gareth Jenkins GRO  
GRO >  
**Subject:** RE: SP Second Witness Statement: Possible examples to use - effective software fixes [WBDUK-AC.FID27032497]

Steve,

Thank you for this.

I'm working on the statement now – next (and hopefully final version) will be with you within 30 minutes. We need to get it out today, so please can you review on receipt? I'll send you a comparison so you can easily see the changes made.

Kind regards

Jonny

**Jonathan Gribben**  
Managing Associate  
Womble Bond Dickinson (UK) LLP

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**From:** ParkerSP@ GRO  
**Sent:** 29 January 2019 09:10  
**To:** Jonathan Gribben  
**Cc:** Matthew.Lenton@ GRO; Dave.Ibbett@ GRO; Lucy Bremner; John.Simpkins@ GRO; Gareth Jenkins <gi.jenkins@ GRO> (gi.jenkins@ GRO )  
**Subject:** SP Second Witness Statement: Possible examples to use - effective software fixes

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Jonny, we've been looking at some potential examples to use within the witness statement. Suggest WBD have a look and decide if it is useful to add them as examples?

## Effective Software Fixes

PC0089918: PSteed2847N - reverse a rem, but when this has been reversed it is doubling up on a balance

+ve: Already mentioned in statement but still shows a quick software error turn round

28/04/03: SSC (Paul Steed) identified error

28/04/03: Paul Steed updated and sent to MSU to handle discrepancy with FAD & POL

30/04/03: Development identify error

01/05/03: Work Package generated: PWY\_WP\_16353 B3S30R

07/05/03: Tested on LST. Fix released.

09/05/03: I have spoken to the PM to say that the software fix was sent down and became active on 07-May-2003 and so there should be no recurrences of the original problem.

PC0123699: 28/07/05 ...payments and receipts are mismatched...PM states he was balancing on node 2 but there was discrepancies...

-ve: Initial SSC response was erroneous, to send back to Helpdesk.

+ve: Fast fix to live for financial issue

+ve: Demonstrates passing to MSU to tie up financial impact with POL

+ve: Example of looking at more than one site, diligence identifying other sites with issue

+ve: Shows how an initial R&P error is seen by PM and support are subsequently able to identify other events that tie it in to other sites

28/07/05: Incorrectly sent back by SSC ...Balancing problems should be dealt with initially by NBSC...

28/07/05: ...Have spoken with the PM and advised...All that remains now is for us to try and identify the root cause of the discrepancy which may take a while. As per usual we will forward our findings on to the MSU who will advise POL accordingly...

29/07/05 With development. Work Package PWY\_WP\_22602 generated

01/08/05: BI3S80R\_WP22602 is now ready for test

02/08/05: Release PinICL PC0123865

08/08/05: This has passed testing in LST and is being returned to RM for live pilot.

09/08/05: sent out to the Pilot 100 successfully

05/09/05: Applied to all live outlets and now in the live Generic Prolists roll-outs using both S70 and S80 spares

When the PM went to produce a trial balance a discrepancy was shown but at the bottom the receipts and payment totals did not match.

The £170 discrepancy was down to an APS txn message that had no product number and no primary or secondary mappings. There was a critical event raised on 21st Jul on counter 9 which helped to identify this (Event Id:4 with the text "**Error Message: Failed to generate EPOSSCore transaction grammar**").

As the txn message was incomplete it was omitted from the rollover 'calculations' and thus caused the discrepancy reported.

When I checked the tivoli event archives yesterday I found that 216 of these events had been logged in the past 7 days at different offices/counters

Looks like whenever the event is raised it is either down to a cancelled quantum txn

Have checked out a sample of 40 to 50 sites and they're all at S80 so its probably safe to assume its an S80 problem.

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