
From: Mark Underwood [mailto:Mark.Underwood@MMS/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Mark Underwood222a42ec-51a8-4dfa-a353-dcea512679657b4]
Sent: Tue 08/12/2015 1:11:02 PM (UTC)
To: 'Christopher Knight' [mailto:Christopher.Knight@GRO]; 'Jonathan Swift' [mailto:Jonathan.Swift@GRO]
Cc: Jane MacLeod [mailto:Jane.MacLeod@GRO]; Patrick Bourke [mailto:Patrick.Bourke@GRO]; Rodric Williams [mailto:Rodric.Williams@GRO]; Steve Allchorn [mailto:Steve.Allchorn@GRO]
Subject: RE: Telephone Call of 02/12/2015: Requested Information & Files.
Attachment: FW: Strictly Private & Confidential - Subject to Privilege arising from M008 - Rivenhall
Attachment: 2. Correcting Accounts for Lost Discrepancies.pdf
Attachment: 3. Receipts-Payments Mismatch Issue Notes.pdf
Attachment: FW: Future Arrangements and Part II

Dear Christopher,

With reference to the outstanding documents, please find attached:

- The internal memo from October 2008 referenced at paragraph 14.8. This memo is included as an attachment to an email chain between Rodric and James Davidson of Fujitsu, within which Rodric asks that Fujitsu respond to the challenges put to Post Office by Second Sight, based upon the contents of the memo (attachment 1)
- The document referenced at paragraph 14.10 and entitled "Correcting Accounts for 'lost' Discrepancies" (attachment 2)
- The document referred to but not expressly 'named' at paragraph 14.10 – "Receipts/Payments Mismatch issue notes" (attachment 3)
- The document referred to at paragraph 14.11 is the "Correcting Accounts for 'lost' Discrepancies" document i.e. attachment 2
- The document referred to at paragraph 14.12 is the "Receipts/Payments Mismatch issue notes" i.e. attachment 3

In addition, prior to the publication of its report, Second Sight gave us the opportunity to comment on Section 14. I have attached this correspondence as well, given its relevance (attachment 4).

I hope this helps, if you need anything else, do let me know.

Kind regards

Mark

Mark Underwood
Complaint Review and Mediation Scheme

GRO

From: Mark Underwood [mailto:]
Sent: 07 December 2015 13:39
To: 'Christopher Knight'; Jonathan Swift
Cc: Jane MacLeod; Patrick Bourke; Rodric Williams; Steve Allchorn
Subject: RE: Telephone Call of 02/12/2015: Requested Information & Files.

Christopher,

Apologies, I must have misheard you on the call.

I thought you were referring to the paragraphs in Post Office's 'Reply', rather than Second Sight's Report itself. I will pull together the documents you have requested below and forward them on.

Thanks

Mark

Mark Underwood
Complaint Review and Mediation Scheme
GRO

From: Christopher Knight [mailto:]
Sent: 07 December 2015 13:34
To: Mark Underwood [mailto:]; Jonathan Swift
Cc: Jane MacLeod; Patrick Bourke; Rodric Williams; Steve Allchorn
Subject: RE: Telephone Call of 02/12/2015: Requested Information & Files.

Mark,

Thank you for this note.

On the final entry, concerning the material referred to in the Second Sight Part 2 Report, at paras 14.1-14.16, it seems to me that the statement you have helpfully provided only deals with the particular Bracknell visit allegation. The paragraphs refer to a number of documents which lead Second Sight to believe that there may be (or have been) the ability to alter Horizon records remotely.

We would like to see those documents referred to please (and any others which the PO believe provide relevant context). In particular, I am referring to:

- Para 14.8 – an internal memo from October 2008
- Para 14.10 – two documents disclosed to SS which describe how the PO handled the bug issues referred to in the Interim Report
- Para 14.10 – a Fujitsu document from September 2010 (and held by the prosecution team – see para 14.11)
- Para 14.12 – a minute of a PO/Fujitsu meeting in August 2010

Best wishes,

Chris

From: Mark Underwood [mailto:]
Sent: 04 December 2015 15:04
To: Jonathan Swift; Christopher Knight
Cc: Jane MacLeod; Patrick Bourke; Rodric Williams; Steve Allchorn
Subject: Telephone Call of 02/12/2015: Requested Information & Files.

Jonathan and Christopher

Patrick has asked that I forward the below note and its attachments on his behalf. Strangely, attachment 5 is 36MB and as such, this has been uploaded on huddle rather than attached to this note. Further, Attachment 4 requires a password to open it, which I will send in an email separate to this.

Regards

Mark

Dear Jonathan and Christopher

Thank you both for time on the telephone on Wednesday. As I have done previously, I thought it would be helpful to provide a summary of where I think our discussions concluded on the various points raised. Please do let me know if I have inadvertently missed anything.

Criminal Cases

You asked that we provide you with suggestions for 3 cases to review that involve a criminal conviction and have not been referred to the CCRC. Accordingly, all relevant case documentation for the 3 cases detailed below has now been uploaded to Huddle for you to review.

-  Gillian Howard
-  Timothy Burgess
-  Damien Owen

Although each of these applicants was prosecuted in 2011, they were in their respective posts as early as 2006. I should point out that these cases were selected, in part, because they will have been included in Cartwright King's 'Sift Review' (the output of which I understand has been shared with you) and as a result, we can be more confident that the prosecution file for each exists, should you wish to view these as well. Clearly, we could have selected cases with prosecutions that took place over a wider time frame though, as you will understand, the earlier the prosecution, the more problematic it becomes to re-assemble such files which have been retained, from their various locations. That said, if you do want to look at more historic files, we will of course set this in train but you should be aware that this is unlikely to be a straightforward or quick exercise.

There is also an outstanding request for a letter outlining Post Office's response to the recommendations Brian Altman QC made in 31 October 2013 advice. Rodric said on the call that he would be providing this to you.

Investigations

Plans are well advanced for you to meet with Angela Van Den Bogerd and lead case investigators Kathryn Alexander and Shirley Hailstones on Monday 14 December.

Helpdesk

We have recently been advised that we may be able to give you actual access to the 'Knowledge Base' and we are making arrangements for this to happen. We are also arranging for you to meet Kendra Dickinson to discuss the Helpdesk, again on Monday 14 December.

Horizon

We have previously provided you with the most recent (2014) E&Y ISA3402 report. I now attach the 2012 and 2013 versions (attachments 1 & 2) of this report. We continue to try to obtain previous versions of the report, for the period they have been used to accredit the Horizon system.

On the call you also requested copies of the 'Payment Card Industry Data Security Standards' reports and those for 2012, 2013, 2014 and 2015 are attached to this email as well (attachments 3, 4, 5 & 6). This standard was used as far back as 2008 and I will forward these earlier reports as soon as I am in receipt of them.

Lastly under this section, since the Bureau Veritas ISO27001 reports also includes detailed information about Fujitsu's own management function, somewhat frustratingly, Fujitsu wishes to redact those parts not relevant to Post Office prior to providing them to us. I will forward them on as soon as I have them.

Meetings

In addition to the meeting with Angela Van Den Bogerd, Kathryn Alexander and Shirley Hailstones and Kendra Dickinson mentioned earlier, you also want to see:

- Alan Bates;
- Pete Newsome;
- Gareth Jenkins;
- Gary Glennard; and
- Mark Westbrook.

We are hoping to be able to arrange for all of these meeting to take place on 14 December and are currently juggling with everyone's diaries. We will also keep open the option of meetings with Simon Clarke and Brian Altman's junior.

In respect of the upcoming meetings with Lord Arbuthnot and Second Sight, we will prepare a short brief for each and share these with you beforehand.

Costs

I said during the call that we would provide you with an indication of how the headline figure of approximately £10m was broken down. This is as follows:

- £1.6m on Second Sight, of which approximately £200k was incurred prior to the establishment of the Scheme;
- More than £500k for Applicants to obtain professional advice in preparing and taking forward their claims against Post Office, including £43k for JFSA's advisor;
- £3.7m million on investigating cases and supporting the Scheme, which includes staff related costs; and
- Post Office Professional fees of approximately £3.3m (which does not include Second Sight's fees).

Please note that this information is not public and we have no plans for it to become so.

Miscellaneous

You requested the advice provided by Tom Weisselberg QC and DAC Beachcroft. I understand Rodric has written to you separately and provided this to you.

Finally, you requested the document referred to at paragraphs 14.1-14.6 of Post Office's Reply to Second Sights Part Two Report. As such please find attached the draft witness statement in which Martin Rolfe discusses the Bracknell testing environment (attachment 7). This was kept unsigned and in draft in order to maintain privilege over the statement until we needed to disclose it. That said, Martin approved its content and it was sent to Second Sight in August 2013.

Kind Regards

Patrick

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