

From: Swil, Jonathan
Sent: 29 May 2014 19:35
To: Band, Christa
Subject: RE: Project Zebra - Next Steps

I don't know. I think to be fair that question probably comes further down the list of questions one might ask about the approach they are taking generally with all of this. I am meeting with Rodric and Deloitte on Monday to discuss this. As I mentioned yesterday, I think PO's expectation is that a first re-draft will be ready for Monday, but unless you suggest we do something sooner, that meeting may be a good opportunity for me to insert ourselves more sensibly into this given your and my expectation that this will take considerably longer than a weekend, during which the partner is absent, to turn around. I will see what I can do.

Jonathan

From: Band, Christa
Sent: 29 May 2014 19:29
To: Swil, Jonathan
Subject: Re: Project Zebra - Next Steps

Thanks. Why doesn't he get us to handle this?

From: Swil, Jonathan
Sent: Thursday, May 29, 2014 07:27 PM
To: Band, Christa
Subject: FW: Project Zebra - Next Steps

Note that he has decided not to pass on the general comments as to approach from my email. He told me yesterday he agreed with those comments, so unless he told them orally, I'm not sure why he thought not to include them.

(This email and others from Rodric have only come through to me in the last 20 minutes).

From: Rodric Williams [mailto:GRO]
Sent: 29 May 2014 10:15
To: James, Gareth (UK - Manchester) GRO; iwhite GRO
Cc: Hignett, Lisa (UK - Manchester); Swil, Jonathan
Subject: RE: Project Zebra - Next Steps

Ian,

Further to my email below, here is the high level outline for how we would like to repackage the draft Report. Please give me a call when you get a chance to get this moving asap.
Thanks, Rod

Introduction

- Include a precise description of instructions and contextualise with reference to the Mediation Scheme.

Methodology

- Explain the methodology used.

- Justify methodology by reference to industry standards/expectations and why other methodologies are not possible/ do not work (e.g. why end-to-end full functionality testing is not possible).

Description of Horizon system

- General description.
- Detailed description of aspects of the system the subject of review.

Analysis/assessment of assurance work

- Outline the key aspects of Horizon, and the assurance work relevant to those aspects, which is under review by reference to the subject matter of complaints in the Scheme. These are the 1) SPMR/ Data Centre “handshake 2) write once/ read many times audit store 3) data centre and the inability for transactions unilaterally to be created within it
- Cover any other aspects of Horizon the testing of which is necessary to provide confidence in Horizon by reference to the range of complaints in the Scheme [Post Office is probably best placed to confirm if there are any such other aspects, although we are happy to discuss that with you.]
- Analysis/testing of the assurance work in respect of each aspect under review.

Conclusions

- Conclusions on each of the aspects of Horizon that have been tested/ the assurance work that has been tested.
- Any broader conclusions that can be drawn about how Horizon operates.

Appendices

- Instructions/engagement letter.
- Assurance documentation reviewed.
- Other documentation reviewed.
- Any other background material that is not directly related to the analysis/ conclusions or otherwise need not go into the body of the report.

Rodric Williams | Litigation Lawyer



148 Old Street, LONDON, EC1V 9HQ

GRO

Postline: **GRO**

GRO

[Post Office stories](#)

[@postofficenews](#)



From: Rodric Williams

Sent: 28 May 2014 17:16

To: James, Gareth (UK - Manchester)

GRO

[iwhite](#)

GRO

Cc: Hignett, Lisa (UK - Manchester); [jonathan.swil](#)

GRO

Subject: Project Zebra - Next Steps

Gareth, Ian,

We have discussed your draft Report with Linklaters with a view to repackaging/supplementing it for use in connection with the allegations made by Applicants to the Mediation Scheme. I have copied Jonathan Swil from Linklaters to this email.

We are under time pressure to deliver a repackaged report to our Board. To progress matters, the next steps are:


1. Linklaters are going to sketch an outline structure for the repackaged report. That will be delivered by close of play today;
2. Deloitte need to reflect that outline in a discussion document (e.g. working draft) prepared using the work done for the current draft Report;
3. We meet on Monday 2 June 2014 to advance the production of the repackaged report.

Ian – can you please confirm your availability for a meeting on Monday (I have cc'ed your EA). We can discuss over the phone what the discussion document could look like once we have Linklaters' outline.

Jonathan – can you please confirm availability for a meeting on Monday, and that we can meet at your offices (One Silk Street, London EC2Y 8HQ).

Thanks, Rod

Rodric Williams | Litigation Lawyer




148 Old Street, LONDON, EC1V 9HQ

GRO Postline: **GRO**

GRO

[Post Office stories](#)

[@postofficenews](#)



This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.

POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: 148 OLD STREET, LONDON EC1V 9HQ.
