
From: Susan Crichton[IMCEAEX-
_O=MMS_OU=EXCHANGE+20ADMINISTRATIVE+20GROUP+20+28FYDIBOHF23SPDLT+29
_CN=RECIPIENTS_CN=SUSAN+20CRICHTONC5FA6431-DC28-49AB-8F0F-
BE4237A4AD4F@C72A47.ingest.local]

Sent: Sun 21/07/2013 4:07:32 PM (UTC)

To: Parsons, Andrew [GRO]; Matthews,
Gavin [GRO]

Cc: simon.richardson [GRO]; Hugh
Flemington [GRO]; Rodric
Williams [GRO]; Jamail Singh [GRO]
Alwen Lyons [GRO]

Subject: FW: SPMR mediation

Attachment: _DOC_27167813(1)_Mediation.DOCX

Attachment: Horizon Investigation / JA meeting - notes from today's 4.30 meeting

Attachment: Current list of thematic issues

Andy – Simon, Alwen and I caught up with SS later on Friday afternoon in order to see whether they had made any progress with establishing the themes for their final report in in October. The SS reaction was somewhat of a surprise and they (esp Ian) aggressively refuted that they had agreed to the suggestion that they could produce a final report in October based on the themes identified. They were absolutely determined that they would not able to do this – and at one stage said that anything they produced for Oct would be very similar to the one that was produced for 7th July. If they could produce anything at all.

We tried to establish what could be done within this timescale – again they refused to commit, we suggested that we would get them extra resource which didn't meet with a positive response and they were unable to articulate what resource they needed to be able to produce a report for October.

As part of this conversation I mentioned that idea of mediation – as a route for cases which would not be part of the thematic report - They were of the view that POL could not unilaterally change what it had been agreed that SS should do. I said that was not our intention and that it would need to be agreed with JA and that JFSA.

So after this frustrating call we spoke to Paula and where we came out was that we should use mediation to review the cases once SS have produced a case review. So we would use the process flow set out by Andy in the attached document, with the difference being that we would not wait until there was a final report, we also moved away from the meeting in October being a final report.

I discussed this idea with SS on Friday pm, and they appeared to be in favour, Ron has since sent an email making some specific points about the process and the fact that the SPMR would need some support on the day and possibly with preparation of the case. BUT broadly he seemed to accept that it was a good way forward.

So, Andy can you have a quick think about this change to the proposal – I have attached Simon's summary – which sets out what we hope this change may achieve. If we use this process we would want to get some of the cases done before the meeting with MP's at the end of October, which plays into Mark Davies's wish to move this forward. For your information I also attach Ian's first pass at the themes for the review – which is an additional reason for not going with a thematic approach. I know that there are disadvantages eg cost and what happens if we don't reach agreement even with the Mediator – can we discuss what the TOR for a mediator would look like.

Thanks
Susan

From: Parsons, Andrew [mailto:[GRO]]
Sent: 19 July 2013 15:27
To: Mark R Davies; Susan Crichton; Alwen Lyons
Cc: Matthews, Gavin; Richardson, Simon

Subject: SPMR mediation

All

As discussed, please find attached a short note on mediating the key SPMR cases.

In the note, I've suggest that the cost of the mediating each case could be around £5k-£10k on the following basis:

- Each mediation lasts half a day.
- Mediator fee: £1k-£3k
- Venue costs: £? (for mediation you will need three rooms in close proximity: one for each party and one for joint sessions. These will be needed for several weeks. BD may be able to accommodate this in our new office in London. If not, POL may need to hire a venue)
- Travel / accommodation: £1k (either the SPMR travels to London or POL travels to the SPMR)
- Legal costs: £2k - £5k (Each case will need to be individually prepared. Will external lawyers attend the mediations? This is fairly common practice but not required)

Happy to discuss these figures but I though it may be more useful to present a picture of the overall costs rather than just the mediation fee element.

Kind regards
Andy

Andrew Parsons
Senior Associate

for and on behalf of Bond Dickinson LLP

Bond Dickinson

Direct:
Mobile:
Fax:

GRO

Follow Bond Dickinson:



www.bonddickinson.com

Please consider the environment! Do you need to print this email?

The information in this e-mail and any attachments is confidential and may be legally privileged and protected by law. [susan.crichton@bond-dickinson.com](#) **GRO** only is authorised to access this e-mail and any attachments. If you are not [susan.crichton@bond-dickinson.com](#) **GRO**, please notify [andrew.parsons@bond-dickinson.com](#) **GRO** as soon as possible and delete any copies. Unauthorised use, dissemination, distribution, publication or copying of this communication or attachments is prohibited and may be unlawful.

Any files attached to this e-mail will have been checked by us with virus detection software before transmission. Bond Dickinson LLP accepts no liability for any loss or damage which may be caused by software viruses and you should carry out your own virus checks before opening any attachment.

Content of this email which does not relate to the official business of Bond Dickinson LLP, is neither given nor endorsed by it.

This email is sent for and on behalf of Bond Dickinson LLP which is a limited liability partnership registered in England and Wales under number OC317661. Our registered office is St Ann's Wharf, 112 Quayside, Newcastle Upon Tyne, NE1 3DX, where a list of members' names is open to inspection. We use the term partner to refer to a member of the LLP, or an employee or consultant who is of equivalent standing. Our VAT registration number is GB123393627.

Bond Dickinson LLP is authorised and regulated by the Solicitors Regulation Authority.

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.
