

From: Angela Van-Den-Bogerd [GRO]
To: Emma Campbell-Danesh [GRO]
Cc: Jonathan Gribben [GRO], Katie Simmonds [GRO], Kathryn Alexander [GRO], Shirley Hailstones [GRO]

Subject: RE: Group Litigation - Witness Statement Horizon Issues [WBDUK-AC.FID27032497]

Date: Mon, 4 Mar 2019 13:42:42 +0000

Importance: Normal

Attachments: TA_HNG_Horizon_Help_Transaction_Acknowledgements_130617_(003).pdf;
HOL_Recovery_-_Quick_Reference_Guide_v5_Rev.pdf;
Test_Transaction_Completed_on_Horizon_System_in_Training_Room_-_Lepton.docx;
Lepton_-_Session_data_Oct_2012.xlsx; 4._Lepton_(Helen_Rose)_report.docx

Embedded: unnamed; unnamed(1)

Inline-Images: image008.png; image009.png; image010.png; image011.png; image012.png;
image013.png; image014.png; image015.png

Emma

Sorry this has taken a little while but the responses are comprehensive and evidence has been located to support these.

Any further queries please let me know.

Thanks,

Angela



Angela Van Den Bogerd

Business Improvement Director

1st Floor, Ty Brwydran,

Atlantic Close, Llansamlet
Swansea SA7 9FJ



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From: Emma Campbell-Danesh [GRO]
Sent: 28 February 2019 14:10
To: Angela Van-Den-Bogerd [GRO]
Cc: Jonathan Gribben [GRO]; Katie Simmonds [GRO]
Kathryn Alexander [GRO]; Shirley Hailstones [GRO]
Subject: RE: Group Litigation - Witness Statement Horizon Issues [WBDUK-AC.FID27032497]

Angela

Apologies, we have been asked a number of questions in relation to the comments you made on the Coyne report document (attached again for ease). We would be grateful if you would be able to provide your answers to these further questions.

Please ignore the questions about whether the documents are in the trial bundle, we will of course pick these up and check.

Many thanks in advance,

Emma

Emma Campbell-Danesh
Solicitor
Womble Bond Dickinson (UK) LLP

d: [GRO]
m:
t:
e:

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From: Anthony de Garr Robinson [GRO]
Sent: 27 February 2019 14:17

To: Emma Campbell-Danesh; Simon Henderson [GRO]
Owain Draper
Cc: Jonathan Gribben; Andrew Parsons
Subject: RE: Group Litigation - Witness Statement Horizon Issues [WBDUK-AC.FID27032497]

Dear Emma,

I don't know if you are the right person to address these points to. If not, please accept my apologies and pass them on to the person who is dealing with Angela VDB's evidence.

I have the following queries and comments on the points made in Angela's note responding to Coyne 2:

1. Coyne 2 para 4.71-4.72:

- a. Angela appears to be saying here that, in Legacy Horizon, any transactions inserted by the SSC into a branch's transaction log will not have a user ID. But in para 184 of her own statement, Angela says that a transaction could be inserted into a counter and if this was done when the counter was being used, the transaction would automatically be given the user ID of that user. Have I misunderstood or is Angela overstating the position/making a mistake? **AVDB response: you have misunderstood/I obviously didn't explain it well enough. If a branch user is logged on to the system when SSC inject a transaction, that transaction will show against that branch user. If there are no users logged on to the system at the time of SSC injecting a transaction this will show on the transaction log with the user ID missing.**
- b. Incidentally, how does Angela know how the transaction insertions she describes in paras 18.4 and 18.5 worked in Legacy Horizon? When and how did she acquire this knowledge? **AVDB response: I first started getting close to this level of detail when investigating the claims as part of project Sparrow/ Initial Complaints and Mediation Scheme. The source of my knowledge has come predominately from information provided by FJ.**
- c. In her final comment on para 4.71 and also on para 4.72, Angela says that any transaction insertions required strict protocols to be followed, including (1) that Post Office had to approve and (2) the SPM had to be told. It may be my fault, by I am not aware of a protocol requiring (2) (I'm not sure about (1), come to think of it):
 - i. Is this the position? If so, could someone direct me to the relevant documents? **AVDB response: the attached Knowledge Article is the process documentation required to be populated with 3 POL authorisers before Fujitsu will accept the instruction to process any transaction insertions etc. Those POL people involved in the authorisation process are not aware of a policy document setting out the approach however there are email chains requesting the authorisation from 3 approvers within POL before FJ will resolve the situation. Email is attached as an example.**
 - ii. How does Angela know that this is the position – what is her source of knowledge? **AVDB response: As Support Services Director (April 2015 – Dec 2016) I was responsible for FSC and as part of this role I had working knowledge of this process. I don't recall a policy document of this but rather this information was relayed to me in discussions with colleagues. Knowledge Articles evidence supports AVDB working knowledge.**

2. Coyne 2 para 4.74-4.76:

- a. In response to para 4.74, Angela says that if an SPM follows the recovery procedures and the receipts that are printed, they will not incur a discrepancy. But what makes her confident enough effectively to say that there has never been a case where this has not happened?

AVDB response: It is likely that there have been cases where a discrepancy has occurred as a result of the Horizon user not following the process properly. I am not aware of a particular case but I could imagine it happening if the Horizon user didn't take the time to read the instructions properly. I am not aware of any issues with the accuracy of the recovery process itself so am confident that the process works as it was designed. Where the recovery process is interrupted by connectivity issues and the recovery failed (as it did in Burke's case) then such instances are picked up (on Failed Recovery Report) and investigated by Fujitsu before being passed to FSC for corrective action.

- b. Angela also says that Burke's situation is always investigated. Is this definitely the case – even if an issue is not reported by the SPM? If so, what makes her so sure about this – is some check done by Post Office or Fujitsu which flags these matters for investigation regardless of what the SPM does and if so, what check and who is it done by?

AVDB response: A failed recovery event is recorded on the Failed Recovery Report. This is report generated by Horizon and used by Fujitsu to investigate all instances of failed recovery. Fujitsu then advise FSC by way of a BIMS report of branches affected; what the impact on the branch is and what the corrective action is eg 'manual reconciliation required' means that FSC will need to issue a TC to correct a financial discrepancy in the branch accounts.

- c. Do we have the document Angela refers to at the end of her comment on para 4.74 – the BIMs report which says manual reconciliation required? If so, could I please have the POL number of the document and can you confirm that it is in the trial bundles?>AVDB response: Yes WBD have it
- d. At the end of her comment on para 4.75, Angela says that SPMs are required to check that the value on TAs agree with their branch records. Could I please have the POL number of the document which requires this and can you confirm that it is in the trial bundles? AVDB response: Attached Horizon Help screen shots – for each of the transactions demonstrated the instruction on screen is 'Check all cash and cheques received for these (paystation™/lottery/drop & go) transactions against the TAs received'

2. Coyne 2 para 4.77 (the Helen Rose report on the Lepton branch reversal):

- a. Am I right in thinking that the disconnected session receipts told the Lepton SPM that the relevant transaction had reversed? Yes
- b. Am I also right in thinking that only the SPM has those receipts, they cannot be extracted from Horizon? They cannot be extracted in receipt format however the detail is documented in the session data extracted from Credence that was included within the Helen Rose report. Both attached for ease.
- c. Could I please be provided with a copy of a disconnected session receipt to see what it looks like and how it tells the SPM that the relevant transaction has not been effected? Is there a sample in the trial bundles anywhere? AVDB response: the HOL Recovery Quick Reference Guide (attached for ease but in my witness bundle) sets out the steps and has an example Disconnected Session receipt and Recovery Receipt within
- d. The Armstrong/second sight email chain that Angela attaches indicates that the Lepton SPM (Armstrong?) received three disconnected session receipts several minutes after the transaction. I have the following questions about this:
- i. Does this email have a POL number and if so, what is it. Is it in the trial bundles? WBD to answer
 - ii. Is this the best evidence we have that Horizon gave him those receipts (I would rather not use a second sight document if I can avoid it)? As 3.b. above
 - iii. Is there any other evidence (for example, did Armstrong ever produce the receipts? Armstrong didn't present the receipts to Post Office however he did reproduce in the email from him to Ron Warmington 25th June 2013 11:34pm. The disconnected session receipts clearly show that the BT bill for £76.09 had been cancelled and was showing as 0.00. The £80 LTSB cash withdrawal was showing as 80.00- with instruction of Total due to customer 80.00. The recovery receipt that was produced at 10.37 shows that the BT bill had not been processed and that the £76.09 should be given to the customer. And is what Jenkins

says on page 2 of the Helen Rose report evidence – “... row 71 of events 4 to 25 Oct 12.xls shows that a receipt was generated from the session 537805 (not explicitly but it was the only session at the time)”?) **Yes – this is the recovery receipt advising the postmaster that the BT bill had not been processed.**

iv. Armstrong’s email of 25/06/13 @ 11.34pm quotes the session receipts that he received. Can someone please take me through those receipts to explain whether it shows that the BT payment had not been effected? **The explanation is detailed above – please let me know if you still need to be taken through the steps.**

v. The later emails also suggest that Armstrong should not have completed the transaction, given the customer a stamped BT bill and allowed him to leave the premises? **Armstrong didn’t actually complete the transaction as to do so it would have needed to be completed on the Horizon system ie the basket settled. Date stamping the hardcopy BT bill confirmed to the customer that Lepton Post Office had taken the payment of £76.09 but unless the payment was sent to BT it wasn’t completed.** Why not? Customers should not leave the counter until the transaction has completed and in the case of paying a bill until the receipt has been printed. Bill payment receipts do not print until the basket has been settled. Why should he have kept the customer at the premises, can could I please have the POL number of the document which requires this and can you confirm that it is in the trial bundles? **Horizon User Guide; Bar-coded bill payments (includes BT Bill) pages 12- 21 documents the transaction.**

I know everyone is very busy but I’d be grateful for as full an answer as possible as soon as possible. Amongst other things, these will help ensure that Angela does not go off piste and it will help in my preparations to cross examine Mr Coyne.

Best wishes,

Tony

From: Emma Campbell-Danesh [GRO]
Sent: 26 February 2019 15:52
To: Anthony de Garr Robinson [GRO] Simon Henderson [GRO]
[GRO] Owain Draper [GRO]
Cc: Jonathan Gribben [GRO] Andrew Parsons [GRO]
Subject: RE: Group Litigation - Witness Statement Horizon Issues [WBDUK-AC.FID27032497]

All,

Please find attached the comments from Angela VDB on Coyne's report.

Many thanks,

Emma

Emma Campbell-Danesh
Solicitor
Womble Bond Dickinson (UK) LLP

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From: Andrew Parsons

Sent: 20 February 2019 14:05

To: Anthony de Garr Robinson; Simon Henderson [REDACTED] GRO
Owain Draper [REDACTED] GRO

Cc: Jonathan Gribben; Emma Campbell-Danesh

Subject: FW: Group Litigation - Witness Statement Horizon Issues [WBDUK-AC.FID27032497]

Comments from Paul Smith on Coyne's report.

A

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

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From: Paul I Smith [REDACTED] GRO

Sent: 20 February 2019 11:32

To: Emma Campbell-Danesh

Cc: Andrew Parsons; Jonathan Gribben

Subject: RE: Group Litigation - Witness Statement Horizon Issues [WBDUK-AC.FID27032497]

Hi all,

Please see attached.

Where the wording is in yellow, I cannot see something specifically to answer, it appears to be a statement of displeasure from Mr Coyne.

The answers in RED are provided by Dawn Phillips. Dawn provided the original information in my statement and therefore needed to provide the clarification.

The answers in Blue, are my comments and answers based on the information provided.

I hope this proves useful. I am currently reviewing my statement as recommended by Bond Solon, and will get back to you on any minor amendments (I am aware it's too late for anything major!)

Regards



Paul Smith

Operations Support Manager

Fire Precautions Officer/FSC H&S

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From: Emma Campbell-Danesh [GRO]

Sent: 11 February 2019 08:09

To: Paul I Smith [GRO]

Cc: Andrew Parsons [GRO] Jonathan Gribben [GRO]

Subject: Group Litigation - Witness Statement Horizon Issues [WBDUK-AC.FID27032497]

Dear Paul,

The Claimants' expert has produced a supplemental report. In this report he comments on our witness evidence and the sections which refer to your witness statement have been extracted into the attached word document.

We would be grateful if you could provide your comments on this, particularly if there is anything you think is inaccurate or misleading. I suggest that the easiest way to do this would be to add your comments in red into the word document at the relevant sections, but please let me know if you would prefer to discuss this over the phone.

Many thanks,

Emma

Emma Campbell-Danesh
Solicitor
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