

SUMMARY OF AGREED AND DISPUTED CLASSES OF DOCUMENTS

ISSUE FOR DISCLOSURE	PLEADING REF (Info only)	AGREED CLASSES OF DOCUMENTS <ul style="list-style-type: none"> Defendant's original classes are set out in black. Classes / words in green are additions proposed by the Claimants and accepted by the Defendant. 	CLAIMANTS' ADDITIONAL REQUESTS WHICH ARE OBJECTED TO BY THE DEFENDANT
Products and services offered by Post Office.	GPOC 4 – 5, 15 GDef 24 - 25 Reply 20	<ol style="list-style-type: none"> Indexes, organisational charts, schedules or diagrams of the suite of products and services offered by Post Office since 1999 Written policies and process documents relating to the rolling out of products and services to postmasters since 1999. 	a) Policies, manuals, process documents, setting out procedures to be applied between Post Office and its clients for dealing with discrepancies, shortfalls or losses.
Post Office's standard contract terms	GPOC 8 – 10 GDef 28 - 31	<ol style="list-style-type: none"> Suite of standard contractual documents used by PO when appointing postmasters, since 1999. Suite of product or service-specific contracts between Post Office and postmasters and guidelines, referred to in the reports of Second Sight Contractual variations issued to the branch network since 1999. Written policies and process documents relating to the process of varying a postmaster's contract. Standard and template documents, letters, notes and memos issued to postmasters relating to the variance of their contracts. 	<ol style="list-style-type: none"> Minutes of management meetings to discuss the variation of postmasters' contracts nationally insofar as such variations concerned or impacted upon the operation or use of Horizon, branch accounts and/or discrepancies and shortfalls that may arise therein. Minutes of management meetings in which the operation and effect of section 12, clause 12 of the standard contract was considered or discussed. Standard guidance, rules, or Instructions to Managers / Contract Advisors regarding the operation and effect of section 12, clause 12 of the standard contract.

Appointment of postmasters	GPOC 42 - 46 GDef 78 - 82	<p>8. Written policies and process documents relating to:</p> <ul style="list-style-type: none"> a. the advertising for vacancies (permanent and temporary) b. the postmaster application processes c. the on-boarding process (including the provision of contracts) d. checks on postmasters prior to appointment e. upfront payments made by postmaster to Post Office; and f. deductions from postmasters remuneration upon a postmaster joining Post Office <p>9. Standard and template documents, letters, notes and memo issued to postmasters before or shortly after appointment as a postmaster.</p>	
Operation of Horizon	GPOC 12 – 17, 22 – 24, 25-28 GDef 33 - 38, 57-60 Reply 9, 36, 41	<p>10. Technical documents regarding Horizon stored by Fujitsu in its Dimensions systems (subject to Post Office using its best endeavours to give disclosure of those documents that are under Fujitsu's control)</p> <p>11. Known Error Log (subject to a suitable means of inspection being agreed).</p> <p>12. Branch Operating Manual (including previous versions or equivalent historic document).</p> <p>13. Operating instructions and rules issued to all postmasters.#</p> <p>14. Minutes of meetings of Post Office's board of directors (or historic equivalent) (a) between 1999 and 2001 at which the roll-out of Horizon, its operation and any associated operational risks were considered or discussed, and (b) between 2010 and 2011 at which the same was considered or discussed with respect to Horizon Online, limited in each case to matters associated with financial reconciliations, shortfalls, discrepancies or losses.</p>	

Fujitsu	GPOC 20 – 21 GDef 47 - 50 Reply 9.6(e), 44 and 45	15. Contract between Post Office and Fujitsu (ICL) for Horizon and all written contractual variations to it.	e) Minutes of meetings between Post Office and Fujitsu at which any known or suspected bugs, errors, or defects (of the nature referred to at paragraphs 22 to 24 of the Amended Generic Particulars of Claim) were considered or discussed, including the Calendar Square/Falkirk issues, Payments Mismatch issue, and Suspense Account bug.
Information available to postmasters regarding transactions	GPOC 14.2 and 19.3 GDef 35, 76(6), 92 - 93 Reply 11, 14.2 - 14.4, 15, 16.1	16. Technical documents regarding Horizon stored by Fujitsu in its Dimensions systems (subject to Post Office using its best endeavours to give disclosure of those documents that are under Fujitsu's control) 17. Branch Operating Manual (including previous versions or equivalent historic document). 18. Any written policies or process documents regarding the completion of branch accounts in the period immediately before Horizon was introduced. 19. Any guidance notes or written advice issued to postmasters on accessing transaction information through Horizon.	f) Written instructions to Managers and Trainers regarding the availability and provision of transaction information to postmasters. g) Internally and externally produced management information, reports and briefing papers containing information and data relating to the aggregate volume, value and nature of Transaction Corrections issued annually since 1999.
Information available to Post Office regarding transactions	GPOC 55 GDef 76(4)-(6), 92 - 93 Reply 46, 47		h) Written policy and process documents, guidance, notes or memoranda relating to: i. The ability of Post Office (whether itself or by Fujitsu) remotely to detect the occurrence of shortfalls or other branch account discrepancies, when the same occurred and whether those discrepancies were caused by bugs, errors and/or defects in the Horizon system; ii. the ability of Post Office and/or Fujitsu to conduct transactions, (by entering, deleting or otherwise altering the same) in postmasters' branches remotely; iii. specific authorization to conduct such transactions;

			<ul style="list-style-type: none"> iv. the exercise of any such ability referred to in a. above; v. the use of “Global User” authorization by Post Office employees and/or contractors; vi. the use of “privileged user access rights” by Fujitsu employees and/or contractors; and vii. Balancing Transactions. <ul style="list-style-type: none"> i) Any written policies or process documents and network-wide instructions to Managers / Contract Advisors / Auditors regarding the recovery of shortfalls from postmasters. j) Minutes of meetings / memoranda / reports relating to Post Office's network-wide approach to identifying, tracking or managing discrepancies, shortfalls or losses, or to Postmasters' ability to dispute shortfalls.
Transaction Corrections	GPOC 18 GDef 39 – 41 Reply 21, 32	<ul style="list-style-type: none"> 20. Branch Operating Manual (including previous versions or equivalent historic document). 21. Operating instructions and rules issued to postmasters in relation to Transaction Corrections. 22. Post Office written policies and process documents regarding the issuing of Transaction Corrections. 	k) <i>[Claimants version of request 22]</i> Post Office written policies, and process documents, internal guidance and briefing notes regarding the issuing of Transaction Corrections.
Declaring, Making Good and Disputing Shortfalls	GPOC 19.1 – 19.3 GDef 44 - 46 Reply 9.3, 22	<ul style="list-style-type: none"> 23. Branch Operating Manual (including previous versions or equivalent historic document). 24. Guidance notes issued to postmasters on how to complete overnight cash declarations and Branch Trading Statements. 25. Guidance notes issued to postmasters on how to make good, settle centrally and dispute shortfalls, including, but not limited to, outside of the 42/60 period. 	

		<p>26. Written policies regarding postmasters making good and settling centrally shortfalls.</p> <p>27. Written policies or process documents regarding the reports which could be run or steps taken by postmasters to investigate shortfalls.</p>	
Training	<p>GDef 17, 61(2), (4), (5)</p> <p>Reply 42 - 43</p>	<p>28. Written policies and process documents relating to the provision of training when a new postmaster joins Post Office, from 1999.</p> <p>29. Written policies on when further training is offered due to the introduction of new products and services.</p> <p>30. Training materials and other standard / template documents used for new postmasters.</p> <p>31. Written policies or process documents relating to ongoing training which is provided due to the needs of postmasters or the introduction of new practices, systems or services.</p>	<p>l) Policies, instructions and guidance notes issued network-wide to trainers related to training on Horizon and Horizon Online.</p> <p>m) Course materials focusing on the dealing with or disputing of discrepancies.</p> <p>n) Network-wide instructions to Post Office trainers in how to train a postmaster to deal with and dispute a shortfall.</p>
Helpline	<p>GPOC 29 - 30, 57 – 58</p> <p>GDef 61 - 62</p> <p>Reply 18 - 19</p>	<p>32. NBSC Knowledge Base (subject to a suitable method of inspection being agreed).</p> <p>33. Written policies and procedures regarding the operation of either the NBSC or HSD helplines, including but not limited to (a) the operation of the escalation process, particularised at paragraphs 61-62 of the Generic Defence (excluding criminal investigations).</p> <p>34. Formal notices issued to postmasters regarding the operating hours of helplines.</p>	<p>o) <i>[to be included at the end of 33]</i> and (b) instructions to both Helplines in dealing with queries from postmasters regarding shortfalls .</p>

Investigations	GPOC 31 GDef 63 - 64 Reply 23 - 24	<p>35. Written policies and procedures regarding the investigation of shortfalls in branches (excluding investigations into suspected criminal misconduct).</p> <p>36. Written policies and procedures for initiating and progressing audits.</p> <p>37. Instructions or guidance (excluding emails) given to auditors on dealing with discrepancies, shortfalls and losses identified or suspected in branch.</p>	
Termination	GPOC 32 – 33 GDef 65 - 66	<p>38. Written policies and process documents relating to:</p> <ul style="list-style-type: none"> a. the suspension of postmasters; and b. the termination of postmaster's contracts (and any connected appeals process). 	
Suspense Accounts	GPOC 38 - 39 GDef 73 - 74 Reply 29 -33	<p>39. Written policies and process documents in relation to the operation by Post Office of any "suspense" account associated with branch accounting, including, specifically, the account or accounts in which unattributed surpluses generated from branch accounts (such as, for example, perceived overpayments by banks in respect of particular transactions) were placed and, after a period of 3 years, credited to Defendant's profits and reflected in its profit and loss accounts.</p>	
Assistants	GPOC 43, 56 and 74 GDef 79, 95 and 116	<p>40. Written policies and process documents relating to the appointment and registration of assistants.</p> <p>41. Training materials provided to postmasters for the training of assistants.</p>	