

Claim No. HQ16X01238

IN THE HIGH COURT OF JUSTICE  
QUEEN'S BENCH DIVISION  
IN GROUP LITIGATION BETWEEN:

ALAN BATES & OTHERS

Claimants

-v-

POST OFFICE LIMITED

Defendant

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**draft/ GENERIC DEFENCE**

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#### A.4 Helpline

49. Paragraph 29 is admitted. Calls to the Helpline are handled in accordance with the following processes:

- (1) Helpline operators categorise the caller's query using an online system (now called "Dynamics", previously called "Remedy") and then provide advice by reference to the Post Office "Knowledge Base", an online resource which contains numerous articles and other guidance documents on various matters (but is not scripted).
- (2) If the Knowledge Base does not contain sufficient information to allow the operator to address the query, the next step is for the query to be escalated to a second tier of more experienced staff.
- (3) If the second-tier adviser cannot respond in a satisfactory way to the query, he or she will seek assistance from the relevant Post Office product team. For example, if an issue relates to a lottery product, assistance would be sought from the team at Post Office who manage the operational processes for that product. For issues relating to the technical operation of Horizon (e.g. a broken printer), the matter could be referred to Post Office's IT support partner, which was originally Fujitsu and is now a company called Atos.
- (4) If, after these steps, a satisfactory response has not been given, Post Office will consider whether to organise a visit to the branch and/or further training for the Subpostmaster and/or Assistant(s) concerned.

- (5) Post Office is willing and able to provide further assistance to Subpostmasters whose problems are not addressed adequately through the Helpline. It is for any Claimant who asserts that inadequate assistance was provided to identify, amongst other things, the steps that he or she took to obtain further advice, assistance and/or training.
50. Paragraph 30 makes allegations to which Post Office cannot meaningfully respond at the pleaded level of generality. Post Office will respond to properly particularised claims if and when they are made by particular Claimants, but the general thrust of the allegations is denied. Further:
- (1) The Helpline's hours of operation have changed over time to meet demand and there have been periods where the Helpline was more difficult to contact than in other periods. It currently operates from 8am to 8pm on weekdays other than Wednesdays (the usual day for branch balancing processes), 8am to 9pm on Wednesdays, 8am to 6pm on Saturdays and 9am to 5pm on Sundays and most bank holidays.
- (2) Helpline operators do not give script-based responses.
- (3) Helpline operators are not instructed to provide misleading information or advice and they would have had no reason to do so.
- (4) Whether it is appropriate to advise a Subpostmaster that a discrepancy should sort itself out depends on the context. For example, the branch could be awaiting a Transaction Correction that should correct an issue.
- (5) Helpline operators are not instructed to encourage a Subpostmaster to produce and confirm a Branch Trading Statement which the Subpostmaster did not believe to be true and Post Office cannot conceive of a situation in which they would do so.
- (6) Helpline operators are not instructed (and are not in a position) to review and advise callers as to the experience of and the incidence of particular problems suffered by all users of Horizon or of the Helpline or as to the incidence of such problems suffered by all such users. Post Office cannot conceive of a situation in which Helpline operators would do these things, or would have the knowledge to be able to make such statements.

- (7) Post Office notes that, in the GPoC, the Claimants have not indicated whether and, if so, how each of the matters alleged in paragraphs 30.1 to 30.7 is alleged to have caused any Claimants any loss.