From: Davidson James[/O=EXCHANGE/OU=ADMINGROUP1/CN=RECIPIENTS/CN=DAVIDSONJ2]

Sent: Thur 31/10/2013 9:33:05 AM (UTC)

To: Harvey Michael]; Lamb Helen[Cc: Bell Gavin **GRO** ; Newsome Pete **GRO** ; Jones

> David M[GRO

Subject: RE: Post Office - Terms of Reference for Expert

Michael,

A quick update:

- I have discussed the content for a revised TOR with Gareth and we are goping to reuse a scoping document that was created last year when we were looking to engage KPMG to do an independent review of the integrity of the audit trail. This will need some re-work but will give us what we need for discussions with POL. Gareth is tied up for the next few days supporting the Channel Integration release so the soonest we can get a draft will be next Thursday (7th).
- Matthew Lenton is in the process of setting up a SharePoint site for all documentation relating to data integrity to be stored. Gareth has a lot of data which is on his laptop and on a server share currently but this will proved us all with a place to keep drafts / wip and historical documentation.

Will keep you posted.

Regards,

James Davidson

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From: Harvey Michael

Sent: 25 October 2013 09:57 To: Lamb Helen; Davidson James

Cc: Bell Gavin; Newsome Pete; Jones David M Subject: Post Office - Terms of Reference for Expert

ΑII,

Helen, James and I had a discussion about this matter this morning. The outputs were:

- 1- The current terms of reference are unacceptable and unworkable. We would be unwilling to provide assistance based on these terms.
- We are therefore going to rewrite the terms of reference
 - a. Mike is to re-write paras 1-5
 - b. James is to look at paras 6-8 (based on what we previously agreed for the Second Sight audit scoping). The questions we can answer is in respect of data integrity (audit data capture process) and any specific questions from postmasters (or verify our answers). It cannot be an "definitive" review of all of the system.
 - Draft to be consolidated in w/c 4th Nov and shared with David Jones for comment.
- 3- Regarding the Mediation process, James highlighted the key concern that POL are allowing cases that have been through court to fall within the mediation process too. We would like David J's view on this.
- 4- It was agreed we will need a repository of previous expert testimony given which we can build up with documentation provided for the Mediation and Expert determinations to ensure consistency of response.
- 5- Once the draft is agreed with David J and call will be set up with the team to discuss
- 6- Mike will send a holding email to Rodric indicating that we will be redrafting some of the ToR.
- 7- A meeting will be set up with POL either for end of w/c 4th November or w/c 18th Nov (unless we don't need me as I'm away on my course w/c 11th)

David – could you give me a call to discuss sometime today.

Thanks

Mike

Michael Harvey

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