POL00148714

From: Jarnail Singh[IMCEAEX-_O=MMS_OU=EXCHANGE+20ADMINISTRATIVE+20GROUP+20+28FYDIBOHF23SPDLT+29_CN=RECIPIENTS_CN=JARNAIL+2EA+2ESINGH6CEADABD-67E9-4ECA-94F2-005716658847@C72A47.ingest.local]
Sent: Tue 15/07/2014 4:06:14 PM (UTC)
To: Chris Aujard GRO
Subject: FW: Expert [BD-4A.FID20472253]

Chris
Please read email below.
Jarnail

Jarnail Singh I Criminal Lawyer

148 Old Street, LONDON, EC1V 9HQ

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From: Jarnail Singh
Sent: 14 July 2014 12:43
To: Andy Holt
Cc: Pheasant, Andrew; Matthews, Gavin; Martin Smith; Rodric Williams; Chris Aujard; Belinda Crowe; Jessica Madron; 'Parsons, Andrew'
Subject: RE: Expert [BD-4A.FID20472253]

Andy
1Let us not lose sight of the fact Cartwright King are specialist criminal Lawyers .They are in far better position to advice POL with regards to expert instructions. They are acting in the best interest of their clients i.e. POL and the way in which the report is being commissioned preserves the independence and integrity of the experts.
2.It is intended to instruct the expert to prepare the report in accordance with the scope but with the proviso that they immediately notify Cartwright King of anything which may cause POL concern. It will enable the process to be terminated without full costs being incurred.
3.Experts have prepared a scope ,detailing the work they need to carry out in order to prepare a report ,which will be fit for purpose.
4.If POL have information which might assist the expert then of course it can be provided. With Deloitte report this can simply be provided to the expert for consideration.
5.POL need to be careful not to be seen to be interfering with the expert report process. Of course it goes without

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saying that POL need to avoid being manipulated by fujitsu i.e. they are the very company whose product expert are going to review.
6.If there are any concerns with the terminology or phraseology of the scope .Please let me have those and I will feed them back to Cartwright King for consideration.
7.Fujitsu should appoint a designated person as previously advice, so that ICL may liaise directly with fujitsu where appropriate.
8. Let us not lose sight of the fact it is in POL wider interest to get the report (and Fujitsu) which gives the Horizon clean bill of health.
9. The cost provided by the expert who would no doubt considered the material provided by Andy Holt and POL.
I hope this assists.
Regards
Jarnail

Jarnail Singh I Criminal Lawyer

148 Old Street, LONDON, EC1V 9HQ

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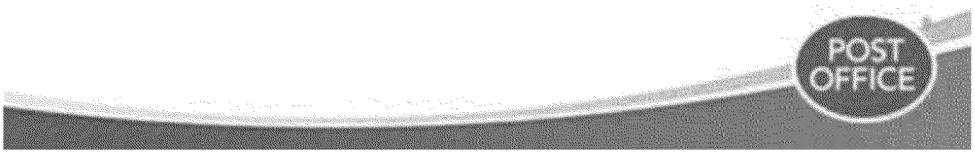

From: Andy Holt
Sent: 10 July 2014 09:21
To: Jarnail Singh; 'Parsons, Andrew'
Cc: Pheasant, Andrew; Matthews, Gavin; Martin Smith; Rodric Williams; Chris Aujard; Belinda Crowe; Jessica Madron
Subject: RE: Expert [BD-4A.FID20472253]

All

- As discussed before there is overlap with the Deloitte work. Rod can we share the Deloitte report with Imperial College. I would also suggest we have a meeting with Julie and you to look at overlap with the requests from Imperial College.
- I want to make sure we are really clear on scope, having read the document I think this is growing again. In previous meetings we had agreement that the following scope would help us progress. i.e. our aim was to get assurance that the transaction data we used in prosecutions was a true reflection of what had happened in branch. I suggest we review the requirement again with consideration of the Deloitte work and therefore decide what we really need it to achieve. Martin, I will pick this up with you and Jarnail.
- I have concerns about ICL's estimate, although it looks very reasonable I am not sure they have understood the scale of this.

Regards
Andy

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From: Jarnail Singh
Sent: 09 July 2014 11:40
To: 'Parsons, Andrew'
Cc: Pheasant, Andrew; Matthews, Gavin; Martin Smith; Andy Holt; Rodric Williams; Chris Aujard; Belinda Crowe; Jessica Madron
Subject: RE: Expert [BD-4A.FID20472253]

Andy
I agree with Martin. POL cannot be seen to be Cheery picking the information provided to the experts or withholding the information. Experts are independent and POL (or Fujitsu for that matter) cannot be seen to be trying to influence the experts.
Regards
Jarnail

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From: Martin Smith GRO
Sent: 09 July 2014 10:34
To: 'Parsons, Andrew'; Jarnail Singh; Andy Holt; Chris Aujard; Jessica Madron; Rodric Williams; Belinda Crowe
Cc: Pheasant, Andrew; Matthews, Gavin
Subject: RE: Expert [BD-4A.FID20472253]

Andy,

I would not advise that the experts be instructed to look at the old Horizon system. If the experts were to consider the old system, depending on their findings, disclosure issues could arise in historic cases. In any event cases now being investigated and considered for prosecution will involve Horizon on Line, which was rolled out during 2010.

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In criminal law instructions and material provided to an expert must be listed in his/her report. The defence are entitled to know what material the expert has considered in order to reach his/her conclusion.

CK would not wish to vet information prior to sending it to ICL; it would be counter-productive to withhold information. The experts may well refer to such attempts and missing information in the report. This would devalue the report and make it easier for defendants to challenge.

I will explore with ICL the "fitness for purpose" heading. If there are any other points, please let me know and I will raise them at the same time.

Kind regards,

Martin.

Martin Smith
GRO
Direct: GRO

From: Parsons, Andrew GRO
Sent: 09 July 2014 07:25
To: Jarnail Singh; Andy Holt; Chris Aujard; Jessica Madron; Rodric Williams; Belinda Crowe
Cc: Martin Smith; Pheasant, Andrew; Matthews, Gavin
Subject: RE: Expert [BD-4A.FID20472253]

All

My thoughts…

A key question appears to be whether ICL look at old Horizon as well as Horizon Online. My guess is that POL won't be now looking to prosecute any old Horizon cases so we can focus on HOL. Martin / Jarnail?

As to access to the SS material, I can't see in principle any issue with this. Material going to SS has been largely vetted already. However, Martin / Jarnail – could you confirm whether an expert under criminal law has to disclose all material instructions / source material in their report? In the civil process, the general rule is that the expert must disclose to the Court and the other side pretty much everything they have considered in forming their opinion. If this applies equally to criminal procedure, then CK / POL may wish to vet any material before sending it to ICL.

We may want to explore what ICL intend to investigate under the "fitness for purpose" heading. This could be as simple as "does Horizon provide the necessary functionality?". Or, it could go wider into "Does Horizon provide a good user experience?". From handling IT disputes in the past, I know that determining the quality of user experience can be a very subjective question, that is difficult to answer.

Finally, I think the structure proposed by ICL really highlights the deficiencies in SS' approach.

Kind regards
Andy

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Andrew Parsons
Senior Associate
for and on behalf of Bond Dickinson LLP

Bond Dickinson

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From: Jarnail Singh [GRO]
Sent: 08 July 2014 16:19
To: Andy Holt; Chris Aujard; Jessica Madron; Rodric Williams; Parsons, Andrew; Belinda Crowe
Cc: Martin Smith
Subject: RE: Expert

Andy
Thanks.
It is perhaps inevitable Imperial college London's experts would wish to speak to Fujitsu directly . Please let me have the name and contact of the person who will be designated by Fujitsu to speak to the experts.
I am keen to avoid further delay. The proposed report represents good value for money and would be extremely useful for POL purposes. Sooner we can demonstrate the system works the better.
Regards
Jarnail

Jarnail Singh I Criminal Lawyer

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From: Andy Holt
Sent: 08 July 2014 12:46
To: Jarnail Singh; Chris Aujard; Jessica Madron; Rodric Williams; Parsons, Andrew; Belinda Crowe
Cc: Martin Smith
Subject: RE: Expert

Belinda/Andy, some of the requests relate to the Second Sights study (which would include MP cases, spot reviews etc). Are we ok to share this information?

Jarnail, I will share this document with both Fujitsu and within IT so that we assess what ICL are requesting.

Regards

Andy

From: Jarnail Singh
Sent: 04 July 2014 13:38
To: Chris Aujard; Jessica Madron; Rodric Williams; Andy Holt; Parsons, Andrew
Cc: Martin Smith
Subject: FW: Expert

Dear All
Please find attached the initial review prepared by professor Kramer and Dr Dulay of London imperial college consultants.
The initial review contains a proposal which is through and outlines the steps the steps to be taken and documentation to be considered. There is a proposed work plan on page 4. As you will see it is estimated that it will take 50 hours consultant days by Professor Kramer and Dr Dulay to complete the work.
Before we proceed with the next step, may I ascertain whether there is any views or observations or questions on the attached documents.
regards

Jarnail Singh I Criminal Lawyer

148 Old Street, LONDON, EC1V 9HQ

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