

Claim No: HQ16X01238, HQ17X02637, HQ17X04248

**THE POST OFFICE GROUP LITIGATION
IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

B E T W E E N:

ALAN BATES & OTHERS

Claimants

AND

POST OFFICE LIMITED

Defendant

**POST OFFICE'S RESPONSE TO CLAIMANTS'
INFORMATION REQUESTS MADE ON 4 MARCH 2019**

Overarching Response

On 4 March 2019, the Claimants' Requests for Extended Disclosure were served, which included seventeen questions about the types of documents used by Post Office and where they might be held (**Information Requests**). Post Office's objections to the Requests for Extended Disclosure were provided on 15 March 2019, pursuant to paragraph 3.3 of the Seventh CMC Order. As explained in WBD's letter of 15 March 2019, Post Office does not consider that the Requests for Extended Disclosure pursuant to PD 51U was the appropriate method for the Claimants to make information requests, however it was recognised that the Claimants were seeking clarity on how best to target their Stage 5 Disclosure requests. Post Office therefore confirmed that it would be willing to offer responses to the information requests, despite there being no Court order requiring Post Office to do so.

Post Office has sought to clarify with the Claimants a number of the information requests. Post Office has not received any substantive response to the clarifications sought as set out in WBD's letters dated 1 April 2019, 19 August 2019 and 29 August 2019. Following these letters, the Claimants responded on 30 August 2019 stating that due to the change of scope of the Further Issues Trial, it was not proportionate for the Claimants to focus resource on answering Post Office's queries. Therefore, responses to the information requests on which Post Office has sought clarification, including in relation to the expanded date range request from the Claimants, are being treated as closed at this stage of the litigation.

Some of the information requested dates back over 19 years and seeks precise details of custodians and document involved in certain activities. It has been difficult for Post Office to identify exactly who held specific roles within the business and the documents they may have produced due to the passage of time. Post Office has made reasonable and proportionate enquiries to find the information requested but it cannot warrant that this information is completely accurate given the passage of time. Nevertheless, it should be practically useful to the Claimants when they are formulating future disclosure requests.

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Agreed Information Request	Defendant's Response
<p><u>Information Request – NBSC helpline and representations alleged:</u></p> <p>A1: Provide copies of all indexes, schedules and lists comprising categories or folders/document titles enabling all NBSC call scripts and reference articles to be identified, searched and inspected.</p>	<p>As explained in WBD's letter of 15 March 2019, this Information Request duplicates the Stage 4 Disclosure Requests A4, F8/F9, H20/H21 and K29.</p> <p>Post Office objected to providing further information in response to this request since the Claimants were seeking information on documents that Post Office had agreed to disclose (and which have now been disclosed as part of Stage 4 Disclosure).</p> <p>WBD's letter of 19 August 2019 maintained this objection and requested clarification from the Claimants as to why information was sought to identify documents which Post Office had already agreed to disclose. No response has been received to this request for clarification and therefore this request is considered closed.</p>
<p>A2: Information on the types of documents generated by Post Office which contain high level statistics and reports supplied to Senior Management relating to:</p> <p>(a) the nature and extent of issues raised with NBSC by branches;</p> <p>(b) the nature and categorisation of NBSC responses to enquiries by branches; and</p> <p>(c) issues raised by branches regarding alleged shortfalls, discrepancies or losses.</p> <p>The information to be provided is limited to the timeframes identified in Mrs Stubbs and Mr Abdulla's IPOCS, giving a date range of January 2007 to August 2010.</p>	<p>Between 2000 and 2014, Post Office stored information concerning the calls made by postmasters to the NBSC in a system called Remedy. Reports could be run on the information stored within Remedy to, for example, group together the calls made that month on particular topics. Remedy had multiple users across Post Office who were able to run such reports.</p> <p>The reporting function of Remedy is the most likely tool to have been used by Post Office to report to Senior Management on (a) the nature and extent of issues raised with NBSC by branches and (b) the nature and categorisation of NBSC responses to enquiries by branches. Our current understanding is that there was no protocol for saving the reports which were run from Remedy into a centralised document repository.</p> <p>Post Office has not been able to recall or locate details of a formal process between January 2007 and August 2010 for regular reporting to Senior Management on the matters (a) to (c) nor any specific categories of documents within which high level statistics and reports on matters (a) to (c) were recorded. We understand that reporting was more likely to have been ad hoc or on the basis of volumes of calls, length of calls and time periods between initial calls to the resolution of the issue raised by the Live Service Incident Management Team.</p> <p>We have not been able to identify a specific category of document used by the Live Service Incident Management Team to report to Senior Management. Communications from this team depended on the incident they were reporting on under the Major Incident Management Process (set out in Response F12).</p> <p>We have identified the individuals who may have undertaken such reporting in Response A3.</p>

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A3: Identify the teams (from the list at Appendix B to the Defendant's EDQ) and the individuals within those teams with responsibility for creating the high level statistics and reports identified in the Defendant's response to Request A2 above, between the date range of January 2007 to August 2010.

We understand the following teams may have been involved with the creation of high level statistics and reports for Senior Management in relation to the subject matters identified in Request A2:

1. **Branch Support Services Team;**
2. **NBSC;** and
3. **Live Service Incident Management Team** (also known as the Duty Management Team or IT Systems Management Team) may have liaised with Senior Management between 2007 and 2010. The team of approximately 8 – 10 members reported to the Systems and Direct Channels Operations Team and Service Desk and Continuity Team. We understand the Live Service Incident Management team had a general reporting function, although not NBSC specific, and carried out analysis of call data to determine trends which may have been reported to Senior Management on an ad hoc basis.

The individuals from the Branch Support Services Team who may have had responsibility for creating high level statistics and reports between January 2007 to August 2010 for Senior Management were:

1. Andrew Kenny
2. Anne Allaker (Change and Improvement Manager, Branch and Customer Support)

The individuals from NBSC who may have had responsibility for creating high level statistics and reports for Senior Management between January 2007 to August 2010 were:

1. Jill Kennedy (NBSC Manager)
2. Susan Stewart (Contact Centre Transition Manager)
3. Mark Haynes (Head of Business Support)
4. Howard Street (Helpline Migration & SSL Acct. Management)
5. Adele Henderson (Head of Network Business Support Centre Programme)
6. Louise Bentley (Tier 2/ PSA Manager)
7. Michael Denison (Tier 2/ PSA Manager)

The individuals from the Live Service Incident Team who may have had responsibility for creating high level statistics and reports for Senior Management between January 2007 to August 2010 were:

1. Dave Hulbert (Senior Service Delivery Manager; Systems and Direct Channels Manager)
2. Gary Blackburn (Live Service and Business Continuity Manager)
3. Richard Ashcroft (Live Service and Business Continuity Manager)
4. Andy McLean (Head of Service Delivery and Head of Operations Control / Operations Controller)

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A4: Please provide a description of the types of documents stored on the 'N:Drive' relevant to the NBSC

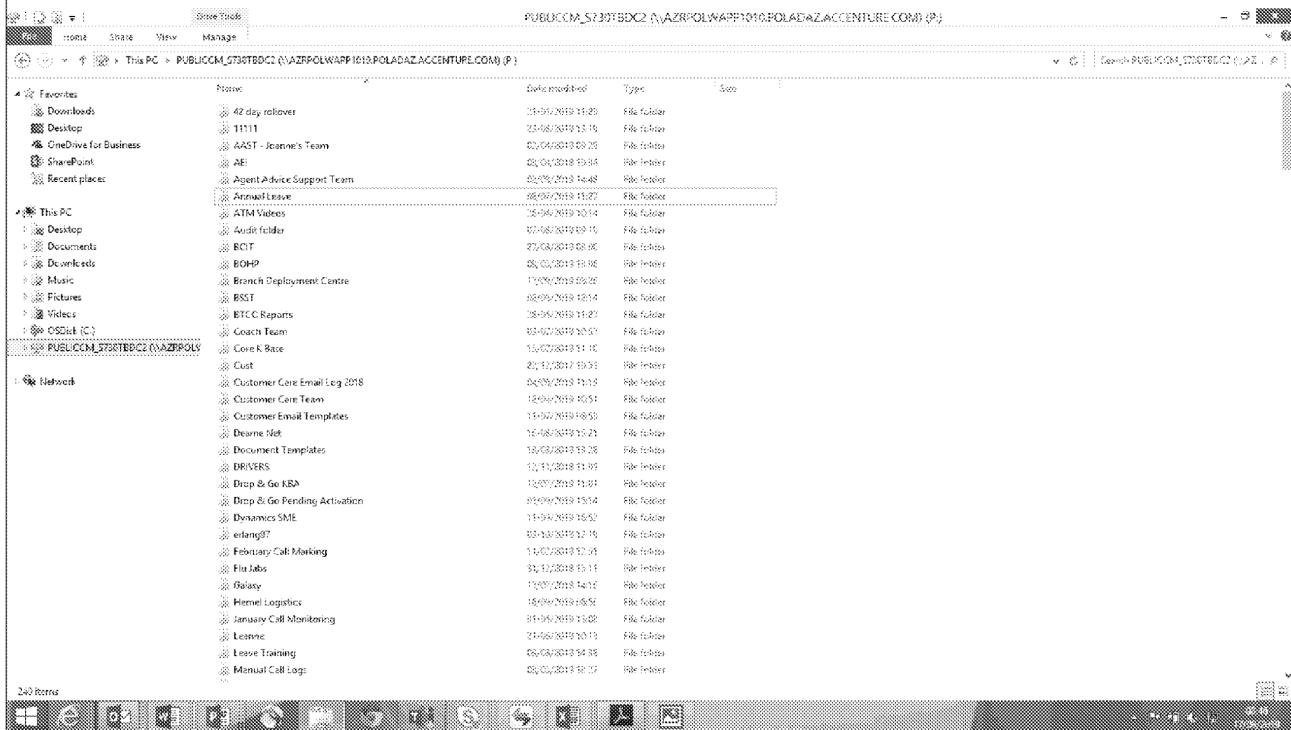
As explained in WBD's second letter of 18 May 2018, which concerned Stage 2 Disclosure for the Common Issues Trial, Post Office undertook investigations during this stage of disclosure to map the Post Office employees who used the "N Drive" and to understand the documents which were stored in this location. Our fifth letter of 23 July 2018 confirmed that *"During our investigations to locate the identity of the N Drive, it has come to our attention that Post Office's NBSC team practice is to store documents in the P Drive."* We are therefore proceeding on the basis that information sought by the Claimants is in relation to the documents stored on the P Drive.

The P Drive is a team document repository used by the NBSC with the file path:

GRO

Our understanding is that the P Drive is used as a central storage location for documents by the NBSC.

Please find below a screenshot of the contents of the P Drive.



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Windows File Explorer window showing the contents of the folder **PUBLIC\CM_5730TBDC2 (\\AZRPPOLWAPP1010.POLADAZACCENTURE.COM) (P)**.

The left sidebar shows the navigation pane with 'This PC' and 'Network' expanded. The main pane displays a list of files and folders.

Name	Date modified	Type	Size
new	20/08/2017 14:35	File folder	
Rewarding Skills Tracker	13/08/2018 09:17	File folder	
RM Archive folders	25/09/2019 10:51	File folder	
RTA	27/09/2017 10:17	File folder	
Ryan Fisher HBSIC	16/02/2017 16:36	File folder	
Service Management	08/08/2018 14:01	File folder	
Skills Matrix	12/11/2018 11:27	File folder	
Smart ID project	17/08/2018 15:04	File folder	
Social Media	21/11/2018 14:50	File folder	
Staffing Issues	31/05/2018 10:57	File folder	
Stock codes: powerpoint - Laura	11/12/2018 10:17	File folder	
Stock Photo's	27/12/2018 10:06	File folder	
Team 5	04/04/2017 09:01	File folder	
Temp Datestamp File	30/08/2018 10:34	File folder	
Temple Fortune	11/01/2019 10:47	File folder	
Test	27/09/2019 10:08	File folder	
Tier 1 Admin	16/04/2019 11:01	File folder	
Tier 2	34/01/2019 14:06	File folder	
Training Calendar	30/03/2018 13:14	File folder	
Training call	06/08/2018 09:56	File folder	
Travel Money Card Enquiries	12/09/2018 10:03	File folder	
Wayne's Docs	01/06/2012 10:18	File folder	
Winzip	01/07/2014 12:27	File folder	
WTL	11/10/2018 09:16	Microsoft Word Doc...	12 KB
2200 Stock Post Office POL107114 Incident Reference 190990	14/08/2018 09:16	Microsoft Excel Wo...	2,038 KB
127007 Lewisham Way Opening Hours Change Request	14/08/2017 11:24	Microsoft Excel Wo...	2,038 KB
171230 - Eye	21/11/2018 10:02	Microsoft Excel Wo...	20 KB
180670 - BRIDGET STREET	24/09/2018 10:11	Microsoft Excel Wo...	2,361 KB
1932118-Kenthorpe - Miskey	06/10/2019 15:25	Microsoft Excel Wo...	36 KB
2541697-Jessie Lee	17/08/2017 12:30	Microsoft Word Doc...	11 KB
262460	29/07/2017 11:47	Microsoft Word Doc...	48 KB
4132017-The Jewellery Quarter - Miskey Form	11/08/2018 17:34	Microsoft Excel Wo...	27 KB
Amenda Locke letter	21/04/2019 11:02	Adobe Acrobat Fi...	519 KB
Appeal - CAS-827703-W52002	14/07/2019 11:51	Microsoft Word Doc...	22 KB

The bottom window shows the contents of the folder **PUBLIC\CM_5730TBDC2 (\\AZRPPOLWAPP1010.POLADAZACCENTURE.COM) (P)**.

Name	Date modified	Type	Size
new	20/08/2017 14:35	File folder	
Branch Standards Compliance Checklist	06/08/2017 14:30	Microsoft Word Doc...	19 KB
BSD Opening Hours Processes V0.3	18/04/2018 09:51	Adobe Acrobat Fi...	417 KB
Bylawway D - 147900 (2002)	04/11/2018 15:39	Microsoft Excel Wo...	40 KB
Call Legend June 2017	03/07/2017 11:05	Microsoft Excel Wo...	296 KB
Change of Hours - Covering Letter	22/02/2017 12:26	Microsoft Word Doc...	14 KB
Consultation Crib Sheet 22.8.12	20/08/2018 09:16	Microsoft Word Doc...	492 KB
Copy of AP Overcredit/Laura vinewood	04/12/2015 10:34	Microsoft Excel Wo...	28 KB
Copy of Branch Codes (203)	01/11/2018 10:40	Microsoft Excel Wo...	1,587 KB
Copy of BSST Branch hours Change YOUR NAM	27/02/2017 15:25	Microsoft Excel Wo...	21 KB
Copy of Haytonbruglaye 10 2015	06/10/2019 11:52	Microsoft Excel Wo...	1,237 KB
Copy of Intervention Request Form v5	17/01/2017 12:07	Microsoft Excel Wo...	60 KB
Copy of Other Inaccuracies - 31 October 2016	07/11/2016 12:46	Microsoft Word Doc...	47 KB
Customer Care Coaching Training Log 2017	31/08/2017 10:07	Compressed shipp...	17 KB
Customer Emails	14/01/2018 07:56	Microsoft Word Doc...	14 KB
Customer Harassment Doc	06/04/2019 10:30	Microsoft Word Doc...	45 KB
CUSTOMER RELATIONS	04/04/2019 12:10	Rich Text File	12,609 KB
Dangerous Goods Mystery Shop Export	02/08/2018 11:21	Adobe Acrobat Fi...	206 KB
dave1316@btinternet.co.uk - VOC - 13 February 2016	13/02/2016 09:04	Microsoft Word Doc...	43 KB
Deanne 30/1/16	15/08/2016 15:12	HTML Document	1 KB
Downloads - Shortcut	18/04/2018 09:06	Shortcut	1 KB
Emergency Closure Allow po - fad 1584206	24/07/2017 14:03	Microsoft Word Doc...	21 KB
Emergency Closure Data Capture Form REP 2026120 COVER PO...	16/12/2017 08:58	Microsoft Word Doc...	34 KB
Emergency Closure Form Branchley FAD 1519484 ref 2334181	11/08/2017 11:26	Microsoft Word Doc...	40 KB
Emergency closure West Didsbury	24/03/2018 09:31	Microsoft Word Doc...	48 KB
Fad 2334181/miseclose estate moneygram issue	27/11/2015 09:41	Outlook Item	37 KB
Forces KIA Direct - 2 missing parcels from Monday 18th January	21/01/2018 14:14	Outlook Item	226 KB
gen busy	06/10/2019 11:30	Windows Media A...	114 KB
Global Useruser	04/04/2019 12:23	Rich Text File	142,204 KB
havant	30/12/2014 14:41	Microsoft Word Doc...	12 KB
HIDINFO.CFG	04/01/19-0 00:01	CFG File	1 KB
Horizon issue	06/05/2018 00:18	Wave Sound	949 KB
idm@msn.com - VOC - 15 February 2016	15/02/2016 11:09	Microsoft Word Doc...	23 KB
IMAG_0650	28/06/2018 10:30	JPEG Image	214 KB
Individual Intervention Request Form V5.1 Feb 2016	11/02/2016 12:19	Microsoft Excel Wo...	60 KB

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The screenshot shows a Windows File Explorer window with the address bar displaying the path: This PC > PUBLICCM_5730TBDC2 (\\AZRPPOLWAPP1010.POLADAZACCENTURE.COM) (F:). The left sidebar shows the navigation pane with 'This PC' and 'Network' sections. The main pane displays a list of files and folders. The taskbar at the bottom shows the Windows Start button and several open applications, including a web browser and a file explorer.

Name	Date modified	Type	Size
Intervention Request Form v3	02/11/2016 10:26	Microsoft Word Doc...	70 KB
James NBSC Calls since 1st Oct	16/10/2016 14:10	Microsoft Excel Wor...	3,809 KB
KB0011027 keyboard damaged V2	03/11/2016 15:02	Microsoft Word Doc...	25 KB
KB0011027 keyboard damaged V3	16/11/2016 10:40	Microsoft Word Doc...	27 KB
KB0011027 keyboard damaged	16/11/2016 16:37	Microsoft Word Doc...	19 KB
KBA Upload NBSC and Branch Support ryan changus	27/04/2016 14:11	Microsoft Excel Wor...	213 KB
Ken Gown - Attachment 1 - 05 April 2017	05/04/2017 11:10	PDF Image	415 KB
Ken Gown - Attachment 1 - 05 April 2017	05/04/2017 11:28	Microsoft Excel Wor...	11 KB
Killnotes	02/04/2016 10:32	Application	29 KB
Isura.stevens@nigbyandparker.com - Positive Feedback - 09 Febr...	15/02/2016 13:30	Microsoft Word Doc...	14 KB
Letter Gary Martin	16/04/2016 15:05	Adobe Acrobat Fi...	382 KB
Lisa Team Productivity 10.10.17	10/10/2017 08:05	Microsoft Excel Wor...	67 KB
Isolated	13/03/2016 12:15	PDF Image	18 KB
Log Of Training Received	24/03/2016 09:44	Microsoft Excel Wor...	20 KB
ITC RTA-Act	01/04/2016 09:59	ACT File	1 KB
lyn.burrows@fide.gov.uk - Response from customer - 15 Febr...	15/02/2016 12:52	Outlook Item	545 KB
Main Adviser Log CC	11/12/2016 15:13	Microsoft Excel Wor...	24 KB
Main Adviser Log NBSC	16/12/2016 13:41	Microsoft Excel Wor...	44 KB
Media_EC1V9HQAPP1 (POLADATMS001) (M) - Shortcut	02/10/2017 11:15	Shortcut	1 KB
Merged	13/03/2016 13:30	Microsoft Word Doc...	40 KB
mile end	20/01/2014 10:27	Microsoft Word Doc...	14 KB
MISKEY Hosham	16/10/2016 12:58	Microsoft Word Doc...	30 KB
MISKEY Sara	16/10/2016 12:58	Microsoft Word Doc...	30 KB
moneygram issue	27/11/2015 09:46	Outlook Item	17 KB
N618 wealthsp 217237 Yo164RB	04/11/2016 13:21	Microsoft Word Doc...	41 KB
NBSC Message	13/02/2016 13:38	Windows Media Ai...	2,20 KB
NBSC-A1_hout	01/11/2016 10:32	Wave Sound	271 KB
NT Calls Voice Mail Box	12/12/2017 17:03	Microsoft Excel Wor...	27 KB
Opening Times - 21 November 2016	20/11/2016 11:06	Microsoft Excel Wor...	36 KB
OSDisk (C) - Shortcut (2)	14/12/2016 19:05	Shortcut	1 KB
OSDisk (C) - Shortcut (3)	17/12/2016 13:36	Shortcut	1 KB
OSDisk (C) - Shortcut (4)	18/12/2016 15:41	Shortcut	1 KB
OSDisk (C) - Shortcut (5)	01/01/2017 15:32	Shortcut	1 KB
OSDisk (C) - Shortcut (6)	19/02/2017 11:59	Shortcut	1 KB

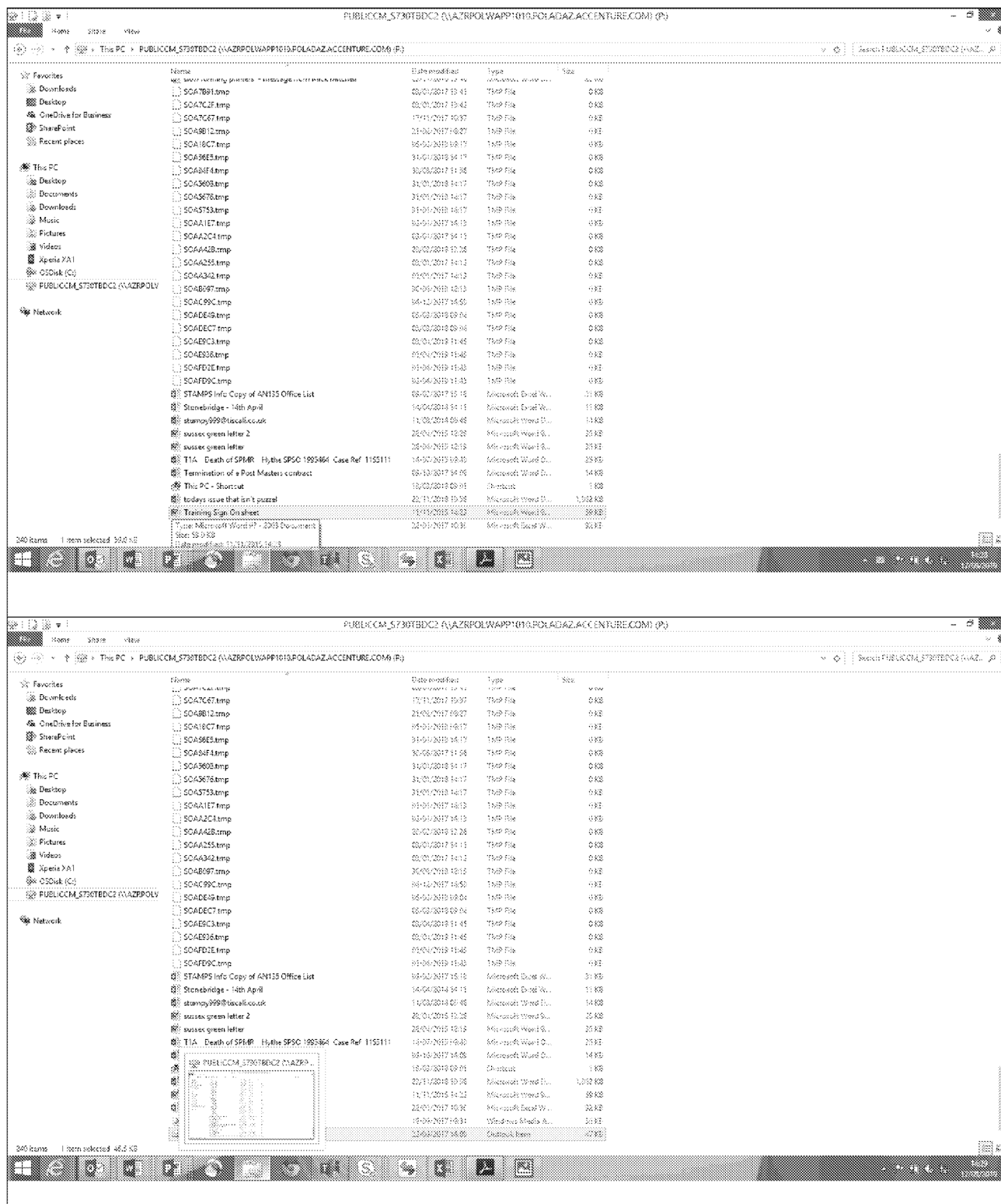
240 items 1 item selected 456 bytes

The second screenshot shows a similar File Explorer window, but with a different set of files and folders. The address bar displays the path: This PC > PUBLICCM_5730TBDC2 (\\AZRPPOLWAPP1010.POLADAZACCENTURE.COM) (F:). The left sidebar shows the navigation pane with 'This PC' and 'Network' sections. The main pane displays a list of files and folders. The taskbar at the bottom shows the Windows Start button and several open applications, including a web browser and a file explorer.

Name	Date modified	Type	Size
OSDisk (C) - Shortcut (7)	14/01/2017 07:36	Shortcut	1 KB
OSDisk (C) - Shortcut (8)	14/01/2017 11:18	Shortcut	1 KB
OSDisk (C) - Shortcut (9)	16/01/2017 11:20	Shortcut	1 KB
OSDisk (C) - Shortcut (10)	16/01/2017 17:17	Shortcut	1 KB
OSDisk (C) - Shortcut	22/06/2016 12:01	Shortcut	1 KB
Other Branch Inaccuracies - 10 October 2016	20/10/2016 14:28	Microsoft Excel Wor...	27 KB
Other Branch Inaccuracies - 21 November 2016	26/11/2016 12:51	Microsoft Excel Wor...	28 KB
P100709	22/07/2016 09:09	PDF Image	5,820 KB
P100710	22/07/2016 10:40	PDF Image	7,124 KB
PCI Programme Plan	12/08/2016 14:33	Compressed (zip...	210 KB
POL BCR Engineer List 07.06.18	07/06/2016 11:10	Microsoft Excel Wor...	34 KB
POL one to one form	20/01/2017 14:08	Microsoft Word Doc...	113 KB
Post Office Issues	01/01/2016 17:04	Microsoft Excel Wor...	13 KB
Post Office Log	01/01/2016 14:31	PDF File	0 KB
PUBLICCM_5730TBDC2 (\\AZRPPOLWAPP1010.poladazaccen...	25/01/2016 16:36	Shortcut	1 KB
Quality form - Kate Turner - Feb 16	13/02/2016 15:31	Microsoft Excel Wor...	37 KB
RE 1-348124052 - Irvine Bakery - 1st Class Metermail (franking)	22/08/2014 00:37	Outlook Item	132 KB
re lottery dispute - Clayton Le Meors- 3304272 - ref 153518	14/02/2016 12:14	Outlook Item	13 KB
Reasons of request change of hours MAINS	24/02/2017 11:22	Microsoft Word Doc...	49 KB
Reasons Of Request Change of hours Traditional	13/01/2016 14:54	Microsoft Word Doc...	22 KB
Reasons Of Request Change of hours LOCAL	21/01/2017 11:28	Microsoft Word Doc...	30 KB
Replacing the ink cartridge on paper Jam V2	10/11/2016 15:34	Microsoft Word Doc...	54 KB
Reynolds	18/04/2016 03:11	Microsoft Word Doc...	19 KB
RFL mag 1	02/04/2015 09:06	Windows Media Ai...	191 KB
Ricoh SP5505S printer cartridge ordering	21/11/2016 09:47	Microsoft Word Doc...	12 KB
Roller Safe Admin password v2	12/11/2016 15:07	Microsoft Word Doc...	345 KB
Roller Safe Admin password	16/11/2016 15:05	Microsoft Word Doc...	345 KB
Rokili BCI T1st v1010	16/02/2015 13:20	Microsoft Excel Wor...	771 KB
Rural Payments	14/04/2014 17:35	Adobe Acrobat Fi...	148 KB
SH agency spend 2015-16	14/05/2015 13:31	Microsoft Word Doc...	22 KB
Shaw01.05.15	01/05/2015 11:45	Microsoft Word Doc...	9 KB
SYMBIT_C264e1603061110	21/01/2016 10:54	Adobe Acrobat Fi...	174 KB
stough estate	27/01/2014 15:40	Microsoft Excel Wor...	512 KB
stough running printers - message from Mick Mitchell	24/11/2016 13:36	Microsoft Word Doc...	22 KB

240 items 1 item selected 217 KB

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**Information Request –
Information held by Post Office**

B7: Identify the teams from those listed in Appendix B to the Defendant's EDQ and the custodians within those teams, who were responsible for deciding what information should be communicated to the branch network:

7.1 by the NBSC helpline regarding alleged shortfalls, discrepancies or losses;

7.2 by the Defendant to the branch network by means of the document categories referred to in Request A6 (a), (b), (c) and (d);

7.3 by the Defendant to external (non-postmaster) third parties, including but not limited to press releases, announcements, media communications and communications with MPs.

The information to be provided is limited to January 2007 to August 2010.

In response to B7.1

- **POL Core Information Management Team** was established around 2005 and was in place throughout the relevant period. The team had approximately 6 members. The POL Core Information Management Team liaised with the NBSC and product managers, both of whom would advise the POL Core Information Management Team on the contents of the KBAs used by the call handlers (where such input was required), for example on the introduction of a new product or service.

Wendy Schofield and **James Unsworth** were key contacts within the POL Core Information Management Team who may have been responsible for deciding what information should be communicated to the branch network by the NBSC via KBAs, along with the product manager (which would change depending on the contents of the communication).

In response to B7.2

- We refer you to paragraphs 5.1 – 5.22 of WBD's letter of 30 August 2019. Each Counter News, Operational Focus, Branch Focus and Memoview identifies an author. The Memoview request forms also list whom that particular Memoview has been reviewed by before it is submitted to Fujitsu to be communicated to the branch network. It should be noted that the authors of those publications may not necessarily be the individuals responsible for deciding what was communicated to the branch network, but merely the authors of these documents.

Each of these types of operational updates were used to communicate matters to the branch network. The teams and individuals involved in deciding what information should be communicated to the branch network, save for the overarching **Communications Team**, will vary depending on the individual topic being communicated. Over 5,600 operational updates were disclosed in Stage 4 Disclosure. As you will see from the volume of operational updates, it is not reasonable nor proportionate to ascertain for each article in each publication which team / individual decided what should be communicated. However, if following inspection there is any particular article(s) that you would like further information about, we can look into that article further.

In response to B7.3

- Post Office are waiting clarification from the Claimants on the meaning of RFI 7.3.

In the meantime we understand that between 2007 to 2010, David Simpson of Royal Mail was the Press Office lead and Mich Fisher of Royal Mail was the Public Affairs lead. We understand these contacts both left Royal Mail several years ago.

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Information Request – Decisions to communicate known bugs, errors or defects

F12: A list of all teams, and named custodians within such teams, with responsibility for deciding whether any matters of the nature referred to in GPOC §23, §24 or §25 would or should be communicated to the branch network.

The matters are:

A: software coding errors, bugs or defects and data or data packet errors which required fixes, which had the potential to produce shortfalls (paras 23 and 24 GPOC);

B: knowledge that Fujitsu: was able to alter branch data directly (para 25 GPOC) was able to carry out changes to Horizon and/ or transaction data which could affect branch accounts (para 25 GPOC)

C: knowledge that Horizon: had "insufficient error repellency" (para 24 GPOC) was "imperfect and had the potential for creating errors" (para 24 GPOC)

The information to be provided is limited to the date ranges of July 2000 to August 2010.

General response

We refer you to Post Office's response to Request B7 and paragraphs 5.1 to 5.22 of WBD's letter of 30 August 2019 regarding the processes for communications being sent out to the branch network between 2000 to 2010.

The following teams may have had responsibility for deciding whether the matters referred to in §23, §24 and §25 of the GPOC would or should be communicated to the branch network.

1) Live Service Incident Management Team, Major Incident Escalation Group; Business Protection Team and selective Service Outage Groups . We refer you to POL-0081287 and POL-0217803.

2) Branch and IT Systems Team – from 2011 onwards, we understand that this team would have been responsible for the production and circulation of weekly technical incidents reports which were emailed to four senior custodians, being:

- (a) **Alan Simpson:** Security Operations, Security Manager (2011/2012) & ISAG Compliance Support Manager (2013)
- (b) **Dave King:** Business Support Manager (2011/2012) & Security Architect (2013)
- (c) **Graham Ward:** Security Programme Manager (2011/2012) & Mails Conformance Deployment Manager (2013)
- (d) **Duncan Godfrey** Information Security, Security Architect (2012/2013)

We understand that the individuals within the Branch and IT System Team who may have generated these reports were:

- (a) **Terry Whitehead,** IT & Change, IT Services Support (2011)
- (b) **Alison Dockerty,** IT & Change, Service Management Support (2012)
- (c) **Claire Hudson,** IT & Change, Service Management Support (2012)
- (d) **Jayne Sanjari,** IT & Change, IT Services Support (2012)
- (e) **Steven Birch,** IT & Change, Live Service MI Advisor (2012)
- (f) **Laura Darby,** IT & Change, Service Management Support (2012)
- (g) **Emma Langfield,** IT & Change, Post Office Service Desk (2013)
- (h) **Julie Edgley,** IT & Change, Post Office Service Desk (2013)

3) Executive Team

We refer to management structure provided on 29 March 2018. As explained at paragraph 6.3, the Group Executive Team's role was to develop and monitor deployment of the Group's strategy and consider overall performance of the Group. In this role, the Group Executive Team may have been responsible for deciding whether any matters of the nature referred to in GPOC §23, §24 or §25 would or should be communicated to the branch network. As explained at para 2.1, the Group Executive comprises of individuals who held certain roles (albeit that the titles of those roles has changed over time). Numerous individuals will have held these roles and therefore been part of the Group Executive Team over the relevant time period.

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	<p>4) Network wide communications</p> <p>If the incident affected the entire branch network, the branch network may have been updated by way of a Memoview. We refer to Post Office's response to Request B7.2 which explains the teams/custodians responsible for the matters to be communicated to the branch network.</p>
<p>F13: A description or list of all categories of document produced, held or retained by the custodians identified pursuant to Request F12 above in which decisions of the type referred to at F12 above were recorded, reported or communicated within the Defendant company.</p> <p>The information to be provided is limited to the date ranges of July 2000 to August 2010.</p>	<p>It is our understanding that the following categories of documents were produced, held or retained by the custodians identified at F12 in which decisions of the type referred to at F12 may have been recorded, reported or communicated within Post Office (some of which have already been disclosed by Post Office in Stage 3 Disclosure):</p> <ol style="list-style-type: none"> 1) Root Cause Analysis Report (RCA Report) created by Fujitsu; 2) simplified Post Office report based upon the RCA Report (e.g. POL-0220693; POL-0218681; and POL-0220101); 3) Weekly technical incidents reports (e.g. POL-0217324 and POL-0218088); 4) Business Incident Management Service reports (BIMs) created by Fujitsu (see WBD's letter of 22 May 2019); 5) Operational Functional Reports (e.g. POL-0215620 and POL-0215637); 7) Quarterly Risk Updates (e.g. POL-0215541); 8) ET Action Logs (e.g. POL-0215618; POL-0215636; POL-0215621; POL-0215623 and POL-0215625); and 9) Network Functional Reports <p>Other forms of communication: we refer you to the process set out in POL-0217803 which states that the main methods of communication between the Live Service Incident Management Team, Major Incident Escalation Group; Business Protection Team and selective Service Outage Groups were emails, telephone calls and text updates.</p>

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G14: A list of all custodians, and teams of which they formed a part, engaged by the Defendant between July 2000 to August 2010, responsible for deciding whether any matters referred to in GPOC §23, §24, §25 (matters set out above), §31.3, §31.4 and §31.5 would or should be communicated to:

- (a) contract advisers; and/or
- (b) any other personnel within the Defendant who were responsible for or involved in the conduct of branch audits or investigations; and/or
- (c) any other personnel within the Defendant who were responsible for, or involved in, taking decisions to suspend or terminate the contracts of postmasters following an audit or investigation, or to whom appeals against such a decisions were made.

Matters (para 31 GPOC, in addition to those listed in RFI F12)

In relation to investigations/ audits in respect of incorrect Branch Trading Statements, discrepancies and shortfalls, Investigators/ Auditors were:

- (a) not instructed, notified and / or informed as to the experience of other SPMRs or Investigators and/ or provided access to information about the same;
- (b) not instructed to seek out the true cause of the incorrect Branch Trading Statements, discrepancies and shortfalls and in practice proceeded on the basis that SPMRs were liable for any shortfall, unless the SPMR could prove otherwise; and/ or

The following teams may have been responsible for deciding whether any matters referred to in GPOC §23, §24, §25, §31.3, §31.4 and §31.5 would or should be communicated to those identified at (a) – (c).

1. **Product and Branch Accounting Team** - The key individuals of this team are noted throughout the Responses to the Information Requests.
2. **Debt Recovery Team** - Paul Dann (Current Agent Accounting Team (2009)) and Jacqueline Whitham (Former Agent Accounting Team (2009))
3. **Fraud Team:** in 2008, the team's email address was GRO As evidenced by the email address, the communications to persons who fall within (a) to (c) may have been decided by Royal Mail between the agreed date range. This email address falls outside of Post Office's control. Jason Collins; Ged Harbinson; Dianne Matthews; Andrew Daley and Lisa Allen were Fraud Team Managers during the relevant period.
4. **Security Team:** Dave Posnett was the Fraud Risk Manager in 2008 and 2009 and sat within the Security Team during 2010. Key contacts in the Security Team during the relevant period were Glynn Burrows and Cathy Macdonald. It is not clear whether these individuals were employees of Royal Mail Group or Post Office during the relevant time as we understand that this team straddled the two entities at different times.
5. **Network Field Support / Admin Support Teams:** the key contacts were Mike Jackson; Andrew Daley; Jane Bailey; Chris Fayers; Dave Ogleby; Sue Richardson; Wendy Mahoney and Linda McLaughlin who were Field Support Team Leaders during the relevant period.
6. **Network Intervention Team / Performance Team:** In 2010, the General Manager of Network Support was Lynn Hobbs, the Network Performance Manager was Craig Tuthill and the Network Field Support Manager was Adrian Wales.
7. **Investigation Team:** In 2008, Paul Whitaker was an Investigation Team Manager.
8. **Outlet Intervention Team:** In 2007 Julia Marwood was the Outlet Support Manager; Gayle Laverick was the Network Co-ordination manager; and Lynn Hobbs was the Network Support General Manager.
9. **Business Development Manager:** Caroline Richards; Paul Hemley; Stuart Eade; John Dixon; Andy Locker; Philip Steer

The Post Office employee make-up of those teams changed over the 10 year period across a wide breadth of functions. It is not proportionate and reasonable to identify all members of these teams. The information provided already in this document and in Appendix B to the EDQ provides the Claimants with a list of key individuals.

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<p>(c) instructed to disregard possible problems with Horizon as a possible cause for shortfalls and/ or it was POL's practice to do so and/ or Investigators did in fact do so.</p>	<p>Key individuals from Senior Management who may have been responsible for deciding whether any matters referred to in GPOC §23, §24, §25, §31.3, §31.4 and §31.5 would or should be communicated to those identified at (a) – (c) were:</p> <ol style="list-style-type: none"> 1. Anthony Marsh (Head of Security and Network Audit/ Head of Network Implementation & Security) 2. Martin Ferlinc (Head of Network Audit) 3. Julia Marwood (Outlet Field Support Manager) 4. Anthony Utting (Investigation Policy & Standards Manager) 5. Dave Pardoe (National Investigation Manager) 6. Manish Patel (Investigation Operations Manager/ National Internal Crime & Investigations Ops Manager) 7. Philip Gerrish (Internal Crime & Investigations Manager) 8. Trevor Lockey (Investigation Operations Manager) 9. Susan Lowther (Senior Security Manager) 10. John Scott (Head of Security) 11. Julian Tubbs (Senior Security Manager) 12. Stephen John Clements (Security Operations Manager) 13. Rod Ismay (Head of Risk Management and Control) 14. John Breeden (National Contract Manager) 15. Lin Norbury (National Contract Manager) <p>Royal Mail trainers may also have been responsible for deciding whether any matters referred to in GPOC §23, §24, §25, §31.3, §31.4 and §31.5 would or should be communicated to persons falling within (a) to (c). We refer you to paragraphs 4.2 and 11.3 of WBD's letter of 30 August 2010.</p>
<p>G15: A description or list of all categories of document produced, held or retained by the custodians identified pursuant to Request G14 above by which decisions (of the type referred to in G14 above) were recorded, reported or communicated within the Defendant company.</p> <p>The information to be provided is limited to the date ranges of July 2000 to August 2010.</p>	<p>We note the Claimants' request sought information in relation to <i>"all categories of documents"</i>. This request is therefore too broad and Post Office has sought to provide a reasonable and proportionate response.</p> <p>We understand from documents already disclosed in Stages 2 and 4 of Disclosure (see paragraph 11 of WBD's letter of 30 August 2019) as produced by the custodians identified under Request G14 that the following categories of documents may record, report or communicate to persons within RFI G14 (a) to (c) matters referred to in GPOC §23, §24, §25, §31.3, §31.4 and §31.5:</p> <ol style="list-style-type: none"> a) ACCs (we refer you to class 43 of documents disclosed by Post Office in Stage 2 disclosure, as set out in WBD's letter of 18 May 2018); b) auditors'/ investigators' pro forma documents which would be completed at an audit (such as Event Capture Forms); c) auditors'/ investigators' pro forma documents which would be completed if an investigation was carried out before/ after an audit; d) training materials. <p>We refer you to paragraphs 4.2 and 11.3 of WBD's letter of 30 August 2019. Prior to separation from Royal Mail in 2012, training was given to auditors, investigators and contracts advisors by Royal Mail Trainers. If for example a training aide-memoir needed to be updated, this would be updated by Royal Mail Trainers. As these custodians and the class of documents are generally outside of Post Office's control, Royal Mail has not been referenced as a custodian in G14 above.</p>

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<p><u>Information Request – handling concerns about Horizon</u></p> <p>G19: In so far as Requests G16, 17 and 18 relate to documents already disclosed to the Claimants, please identify (by reference to their existing disclosure ID (POL-[xxx])) the documents which are relevant to Requests G16, 17 and 18.</p>	<p>As explained in WBD's letter of 15 March 2019, this request required Post Office to incur the costs of identifying documents which have already been disclosed in the Common Issues and Horizon Trials in relation to Requests G16 — G18.</p> <p>WBD's letter of 19 August 2019 maintained this objection and requested clarification from the Claimants on how the Claimants believed that the identification of documents using de-duplication could be achieved. In any event, we refer to WBD's letter of 28 June 2018 which identifies a number of documents which may fall within Requests G16 to G18 and the methods by which the Claimants could locate further similar documents which have already been disclosed.</p> <p>No response has been received to this request for clarification and so this request is considered complete.</p>
<p><u>Information Request – policies on the provision of transaction data</u></p> <p>H22: A list of all custodians, and teams of which they formed a part with responsibility for the formulation and communication of any policy or guidance produced between January 2007 and August 2010 in respect of requests made by postmasters for:</p> <p>(a) transaction, event or session data;</p> <p>(b) ARQs;</p> <p>[(c) error notices – NB error notices fall outside of the agreed date range and so have not been addressed in the Response];</p> <p>(d) transaction corrections or error notices issued.</p>	<p>In response to Request H22, parts (a) and (b):</p> <p><i>It should be noted that transaction and event data is another name for ARQ data.</i></p> <p>We understand that it is / was rare in practice for a Subpostmaster to request ARQ data.</p> <p>If a request for ARQ data was made by a Subpostmaster, it would most likely be made to a Subpostmaster's contract adviser or via the NBSC helpline and so these form the likely group of relevant custodians.</p> <p>We refer you to paragraph 18.4 of WBD's letter of 30 August 2019. Session data was not available until the Post Office used a system called Horice in early/ mid 2014 and therefore no information has been provided in respect of the custodian/teams with responsibility for the formulation and communication of any policy or guidance in respect of requests made by postmasters for session data as this falls outside the agreed date range.</p> <p>In response to Request H22, part (d):</p> <p>It is not clear what information the Claimants are seeking in relation to Transaction Corrections.</p> <p>We have therefore interpreted this request to mean "which custodians, and teams of which they formed a part had responsibility for the formulation and communication of any policy or guidance produced between January 2007 and August 2010 in the issuing of Transaction Corrections and responding to the Claimants' queries in respect of Transaction Corrections".</p> <p>The teams involved in Transaction Corrections who may have had responsibility for the formulation and communication of any policy or guidance produced between January 2007 and August 2010 in the issuing of Transaction Corrections and responding to the Claimants' queries in respect of Transaction Corrections were:</p>

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	<ul style="list-style-type: none"> • Financial Services Centre Team (FSC). From 2005, the FSC were responsible for the creation of Transaction Corrections (e.g. POL-0173134); • Product and Branch Accounting team (P&BA). This team would investigate where a discrepancy appeared between POL FS data and client data. (e.g. POL-0173307 and POL-01730930); • Compliance Teams - we refer you to the disclosed Event Capture Forms (e.g. POL-0017362); • Outlet Intervention Teams (e.g. POL-0182395 and POL-0523155_0001 for team standards in 2007); • Business Development Managers (e.g. POL-0323706); • Contracts Advisors (e.g. POL-0001081); and • Debt Recovery Team (e.g. POL-0173094). <p>Error notices have not been considered in the response to this RFI as they fall outside of the date range.</p> <p>We have identified the key custodians of these teams where relevant elsewhere in this document, in particular see K30 and K31.</p>
<p>H23: A list of <i>all categories of document</i> by which policies or guidance of the nature referred to in Request H22 above were recorded or given effect.</p> <p>The information to be provided is limited to the date ranges of July 2007 to August 2010.</p>	<p>Post Office has already provided disclosure of documents relating to Transaction Corrections in Stages 2 (classes 24 and 25) and 3 Disclosure (classes 1 to 3, 5 to 10 and 15). These documents have been tagged with the document tag of "transaction corrections".</p> <p>From the disclosed documents, the Claimants are able to ascertain which teams and authors who prepared the documents. We have identified an example document(s) against each team above.</p> <p>If there are any specific documents within the disclosed documents which the Claimants would like further information about, please notify us of the respective BeginBates references and we can look into those identified documents, teams and authors.</p>

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Information Request – suspense account and branch accounts

J27: The names of all Senior Management, and their roles, who have had responsibility since 2000 for:

- (a) the processes described in §73(2) and §73(3) of the Generic Defence and any similar or related processes; and
- (b) any policy or guidance applied by the Defendant as to sums credited to its accounts as described in (or similar/related thereto) the said paragraphs of the Generic Defence.

The processes described in s.73(2) and (3) cover:

- (a) the process of reconciling its figures with its clients
- (b) the existence of processes for recording and resolving "credits" as part of Post Office's ordinary business practice and any similar or related processes; and
- (c) any policy or guidance applied by Post Office as to sums credited to its accounts.

The information to be provided is limited to the date ranges of July 2000 to August 2010.

The **Settlements and Reconciliation Team** was in operation for some of the relevant time between 2000 to 2010. The Settlements and Reconciliation team was responsible for making settlements or payments to clients for the transactions completed over the counter and accounting for receipts. There were about 10 – 15 team members.

Dawn Brooks was responsible for the **Settlements and Reconciliation Team** between 2003 to 2006.

Ms Brooks recalled the following senior individuals from management between 2000 – 2010 who may have had responsible for the processes described in §73(2) and §73(3) of the Generic Defence and/or the production of policy or guidance in relation to the operation of "suspense accounts":

- 1) **Paul Graham Uden** – Client Accounting Manager, Error Resolution Manager 2 (TP), Head of Financial Operations (TP), Support & Supplier Manager
- 2) **Victoria Ann Noble** – BPC9 Exceptions Manager, Head of Client Accounting & Cash Manager, Head of Operations (TP), Head of Product & Branch Accounting, Quality Assurance & Process Imp. Mgr (TP), Support & Supplier Manager, Training & Competence Manager (BLK)
- 3) **Jeanette Brown** – Business Architect, Cash Policy & Reporting Manager, Design Authority Manager, Design Manager, National Cash Manager, Quality Assurance & Process Imp. Mgr (TP)
- 4) **Andrew Carter** – Cash Policy & Reporting Manager, Liquidity Manager, Method of Payment Accountant, Senior Liquidity Manager
- 5) **Mandy Bonita Jepson** – BPC9 Decision Support Manager, Change and Performance Manager, Customer/Marketing Relationship Mgr (TP), Ops Control Change Manager, Planning Manager (TP), Planning Manager Transaction Processing
- 6) **Ann Clarke** – Business Change Senior, FROZEN BPC9 Finance Change Manager, Project Manager, Transformational Change Manager (TP)
- 7) **Susan Mary Harding** – Business Partner Group, Chief Process Architecture Mgr, Design Manager, Head of Business **Architecture**, Head of Operating Process, MI Project Manager, Release & Programme Manager
- 8) **Linda Tracey Anne Salem** – Test Domain Manager, Testing Analyst
- 9) **Alison Bolsover** – BPC9 Exceptions Manager, Client Accountant, Exceptions Manager, FROZEN BPC9 Head of Operations
- 10) **Peter Michael Corbett** – Finance Director

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<p>J28: A list of categories of document recording:</p> <p>(a) the processes;</p> <p>(b) policies or guidance; and</p> <p>(c) implementation of the matters described in Request J27 above.</p> <p>The information to be provided is limited to the date ranges of July 2000 to August 2010.</p>	<p>During the relevant time period, Post Office's Settlements and Reconciliation Team used a bespoke accounting solution called Client Ledger and Settlement System (CLASS). CLASS was used to create a monthly trial client balance and the Settlements and Reconciliation Team was responsible for explaining the balances on the client accounts.</p> <p>Our understanding is that a series of reports would have been produced by the Settlements and Reconciliation Team, one of which was a monthly report called a "probity summary report".</p> <p>Each appropriate product team was responsible for the balancing of the probity within their area of control. Once balanced the probity report was forwarded to the Probity Lead CSA. The Probity Lead CSA collated the reports from product teams and forwarded the final probity report to Finance and the Probity Lead STL. The Probity Lead STL compiled the Probity Summary Report. The individuals who held these roles changed numerous times during the 10 year relevant period and so have not been identified.</p> <p>The Settlements and Reconciliation Team would also receive a client transaction summary from Fujitsu (CTS report) which was compared to the client transaction balances pulled from CLASS, amongst a number of other reports which were sent by Fujitsu to the Team daily, weekly and monthly.</p>
<p>Information Request – transaction corrections and error notice issues</p> <p>K30: A list of all custodians and teams responsible between January 2006 and August 2010 for authoring policies and/or guidance on the production of transaction corrections where the documents electronically verify the authors.</p>	<p>From a review of the tagged "Transaction Correction" documents disclosed under Stage 2, Stage 3 and Stage 4 Disclosure we were able to ascertain that Jo Shooter-Holt, Martin Box, Dawn Brooks, Andy Winn, Marie Cockett, Paul I Smith, Alison Bolsover and Carol King may have been responsible for authoring policies and/ or guidance on the production of transaction corrections. We understand that the Claimants are seeking the same information as set out above in H22.</p> <p>These individuals worked within or with the following teams:</p> <ol style="list-style-type: none"> 1) FSC; 2) Product and Branch Accounting; 3) Debt Recovery; and 4) Contracts Advisors. <p>Error Notices fall outside of the agreed date range and so have not been considered in Post Office's response.</p>

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<p>K31: Post Office agreed to confirm the teams in which Richard Marples and Alison Bolsolver were in at the relevant times in relation to the below documents.</p> <p>31.1 Report disclosed under doc ID number POL- 0221544</p> <p>31.2 Review of the Creation and Management of Transaction Corrections in POLFS (10 February 2010) (POL-0173314)</p> <p>31.3 Table of transaction corrections issued in 2013-14 (disclosure date 22 October 2014) (POL-0221563)</p>	<p>In response to K31.1:</p> <ul style="list-style-type: none"> the report titled "Period 7, P&BA Transaction Correction Reporting Pack" was created in November 2012 and authored by Richard Maples (TC Pack). Richard Marples' role title was Grapevine Analyst working in the Fraud and Conformance Team. Colette McAteer was Richard's line manager at that time. Mr Marples' recollection is that he was asked to produce the TC Pack by Senior Manager, Marie Cockett, of the P&BA team. <p>In response to K31.2:</p> <ul style="list-style-type: none"> The document titled "Review of the Creation and Management of Transaction Corrections in POLFS" was created in February 2010 and lists the following individuals as working on this document: <ul style="list-style-type: none"> (a) Martin Box - Business Analyst, Business Efficiency 3 Team (b) Jo Shooter-Holt - Business Analyst, Business Efficiency 3 Team (c) Alison Bolsover - Branch Conformance and Liaison Manager – Branch Conformance and Liaison Team (d) Dawn Brooks – Banking Strategy and Change Manager, Change and Financial Control Team (e) Rod Ismay - Head of Product and Branch Accounting The document details the triggers that lead to the creation, types of and the parameters around Transaction Corrections and focuses on the work carried out by the P&BA team. We understand from Ms Bolsover that she was able to locate in her One Drive a subsequent version of the original document which was saved on 1 March 2010. The subsequent document has been tagged as an RFI document and disclosed along with this Response. All comments in the document saved on 1 March 2010 have been made by Managers within P&BA at that time as you will see noted within the document. <p>In response to K31.3:</p> <ul style="list-style-type: none"> The document titled "Table of transaction corrections issued in 2013-14" was created in October 2014. The document was authored by Ms Bolsolver, who was the Debt Recovery Team Leader and Rod Ismay, the Head of Product and Branch Accounting.
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	<ul style="list-style-type: none"> Ms Bolsover could not recall who from Post Office contributed to this specific document and / or asked for it to be prepared. However, she thought the following individuals may have been involved in TC reporting work around this time: <ul style="list-style-type: none"> Andy Winn, Mark Wood (Method of Payment Manager (FSC)), Joy Lennon (Systems and Master Data Manager – Accounting and Reporting, (FSC)); Paul I Smith (FSC Personal Banking & Camelot Team Leader/ Branch and Product Accounting Team, Team Leader); and Martin Knights (Financial Accounting Manager/ Management Reporting Manager (FSC)).
<p>K32: A list of <i>all custodians</i> (or, to avoid duplication, those of the custodians identified in answer to Requests K30 and K31 above) with responsibility for monitoring, investigating or reporting to Senior Management upon:</p> <p>32.1 The accuracy and basis of transaction corrections and error notices; and</p> <p>32.2 the extent of disputed transaction corrections and error notices and the Defendant's treatment of the same; and</p> <p>32.3 'Camelot data integrity' - as described in the Operations Board Agenda dated 17 October 2017</p> <p>The information to be provided is limited to the date ranges of January 2006 to August 2010.</p>	<p>In relation to K32.1 and K32.2:</p> <p><i>Error notices fall outside of the date range and so have not been considered in Post Office's response.</i></p> <p>Rod Ismay was the Head of Product and Branch Accounting and the Head of Risk and Management Control between 2003 and May 2016. Mr Ismay no longer works for Post Office. Post Office has attempted to contact Mr Ismay to understand who within Post Office was responsible for monitoring, investigating or reporting to Senior Management on the requested topics between 2006 and 2010 as he is the best placed person to provide this information.</p> <p>The Settlements and Reconciliation Team worked with PB&A to reconcile client data against Horizon data through Probity Reports. This team may have been responsible for monitoring, investigating or reporting to Senior Management upon the issues set out in K32.1 and K32.2 during the relevant period.</p> <p>In relation to RFI 32.3:</p> <p>The custodians who may have had responsibility for monitoring, investigating or reporting to Senior Management upon 'Camelot data integrity' - as described in the Operations Board Agenda dated 17 October 2017 are:</p> <ol style="list-style-type: none"> 1) Stuart Nesbit (Finance Director) 2) Paul I Smith (Senior Manager in FSC) 3) Allison Walton (Camelot Team Leader) 4) Alison Bolsover (Senior Debt Recovery Manager)
<p>K33: A list of repositories or locations in which any documents produced by the custodians identified in answer to Request K32 above can be found.</p>	<p>The custodians identified in answer to Request K32 above would have had access to a number of document repositories depending on what team they were a part of at the relevant time, along with use of their email account. We refer you to Appendices C, D and F of Post Office's EDQ which set out the possible repositories and locations of documents.</p>