

Message

From: Jane MacLeod [GRO]
Sent: 21/11/2016 08:47:18
To: Parsons, Andrew [GRO]; Mark Underwood [GRO];
 Rodric Williams [GRO]
CC: Lukas, Elisa [GRO]; Prime, Amy [GRO]
Subject: RE: Remote Access Wording
Attachments: Remote Access Rider.pdf

I've attached my minor comments, but there is a more substantive one as to how we present the argument under 'Administrator Access'.

I think the sequence of statements should be as follows – note this is not drafting(!) and much of the existing wording could be used:

- The question of access has come up many times starting with the Rudkin allegations, and including many specific questions raised by SS
- In relation to such specific questions, PO reverted to FJ to clarify the technical details in order to respond appropriately to the specific question asked
- PO has recently commissioned further work and this is wider in scope than the specific questions previously asked.
- In summary:
 - PO does not have access or the ability to change transaction data
 - There are a small number of staff within FJ who currently and historically have had administrator access. This means
 - FJ have advised us that there are controls in place to ensure that this administrator access is not used inappropriately [tbc]

Happy to discuss.

jane



Jane MacLeod

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Mobile number: [GRO]

From: Parsons, Andrew [mailto:Andrew.Parsons@GRO]
Sent: 20 November 2016 13:17
To: Mark Underwood [GRO]; Jane MacLeod [GRO]; Rodric Williams [GRO]
Cc: Lukas, Elisa [GRO]; Prime, Amy [GRO]
Subject: RE: Remote Access Wording

Thanks Mark.

I've updated the attached. Where I agreed with your suggested amendments, I've included them and deleted the respective comment. In relation to your other questions, I've added my answers to the attached.

A

Andrew Parsons
Partner
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From: Mark Underwood [GRO]
Sent: 18 November 2016 21:15
To: Parsons, Andrew; Jane MacLeod; Rodric Williams
Cc: Lukas, Elisa; Prime, Amy
Subject: RE: Remote Access Wording

Andy, Jane & Rod,

I have track changed my comments, for your consideration, in the attached version.

Mark

From: Parsons, Andrew [GRO]
Sent: 18 November 2016 19:25
To: Jane MacLeod; Rodric Williams
Cc: Mark Underwood [GRO]; Lukas, Elisa; Prime, Amy
Subject: Remote Access Wording

Jane, Rodric

As discussed in the con with Tony, please find attached our draft wording on the "remote access" issues. This wording will be part of a longer letter to Freeths that we hope to circulate next week.

In the attached, we refer to certain information provided by FJ to Post Office about editing transaction data. This information was by way of an email (attached) that was arguably subject to litigation privilege. By referring to this information in our letter (i) we may be waiving privilege in that email and (ii) Freeths could push for a collateral waiver of privilege in other emails from FJ on the same topic.

We have not expressly referred to the email in the letter to minimise this risk. However, my view is that if we do not explain that Post Office relied on information provided by FJ, Post Office's story is severely weakened and hence some risk of waiving privilege should be taken.

Happy to discuss this point in more detail. All comments on the attached are welcomed.

Kind regards
Andy

Andrew Parsons
Partner
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