

Message

From: Andrew Parsons [GRO]
Sent: 17/07/2017 14:17:19
To: Rob Houghton [GRO]
CC: Rodric Williams [GRO]; Mark Underwood [GRO]; Jane MacLeod [GRO]; Amy Prime [GRO]
Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Rob

Understand your view from a technical perspective. However, the reason it is phrased this way is to give us some wriggle room. Saying "admin access is absolutely not functionality" creates a higher risk that that statement could later be proved to be incorrect. This section of the Defence is all about historic statements that were not correct, and so we need to be very careful about saying things that could be challenged. My language is, admittedly, much less clear than yours but that is intentionally so.

A

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From: Rob Houghton [GRO]
Sent: 17 July 2017 14:52
To: Andrew Parsons
Cc: Rodric Williams; Mark Underwood; Jane MacLeod; Amy Prime
Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

I've looked at it a few times during the last meeting and the problem is (and I know I'm being pedantic) but the sentence doesn't really make sense to me! The phrase "it is admitted that, although this would not usually be classified as "functionality"" –is odd. If it makes sense to a lawyer then that's fine. For the record though – it would never be classified as functionality. If that functionality was wanted (the ability for administrators to change data) then it would be coded entirely different. It's actually a known unfortunate consequence of systems and therefore you have extensive controls around it (which we do have). In fact – it's encouraging that the controls are so extensive that the risk has been really reduced down to a very small level. In most organisations then the controls are nowhere near as extensive as this. I can't think of a form of words to make this work! (other than the ones I proposed)

R

From: Andrew Parsons GRO
Sent: 17 July 2017 12:18
To: Rob Houghton
Cc: Rodric Williams; Mark Underwood GRO; Jane MacLeod; Amy Prime
Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Rob

On the first para: As this is Post Office's defence it is Post Office that has to make all the submissions, even where we are relying on FJ. Hence why it says "Post Office would characterise...." However, I'll speak to Tony about removing this sentence.

On the second para: You're amendments below create risks. First, if we say admin access is a common feature, the Claimants will say how did you miss it before? This is a hostage to fortune. The second element below sounds like the admin access was a mistake and should not have been part of the designed system. I understand the points you are making, but they could be mis-read by a judge.

Was my original amendment incorrect? Set out below for ease of reference.

. As to paragraph 27, it is admitted that, although ~~Horizon was not designed to have this functionality~~ this would not usually be classified as "functionality" within an IT system, there was a highly theoretical possibility that certain Fujitsu personnel could abuse their privileged user rights to circumvent the protections in the system as designed so as to edit or delete branch transaction data as described in paragraph [57(4)XX] above

Kind regards
Andy

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From: Rob Houghton GRO
Sent: 17 July 2017 12:03
To: Andrew Parsons

Cc: Rodric Williams; Mark Underwood; Jane MacLeod
Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Response in >>>>

Read through it all. Two comments - on this statement...

- (1) All IT systems experience software coding errors or bugs which require fixes to be developed and implemented. For a system of Horizon's scale, Post Office would characterise the number of errors or bugs in Horizon requiring fixes as relatively low. In any event, as is noted in paragraph [53 and 54XX] below, there are robust measures in place for their detection, correction and remediation.

Can we say they are relatively low? Where did this come from? Not sure I could say this without further data. THIS IS FJ's LANGUAGE AND THEY WERE HAPPY WITH IT.

>>> Can they defend it? If so – do we need to assign to FJ; the bit I am concerned about is “Post Office would characterise the number of errors or bugs in Horizon requiring fixes as relatively low...” I wouldn't/ couldn't !

2. As to paragraph 27, it is admitted that, although ~~Horizon was not designed to have this functionality~~ this would not usually be classified as "functionality", there was a highly theoretical possibility that certain Fujitsu personnel could abuse their privileged user rights to circumvent the protections in the system as designed so as to edit or delete branch transaction data as described in paragraph [57(4)XX] above.

I don't think it needs the phrase “ although Horizon was not designed to have this functionality” – its not functionality – admin access is available in every system globally. I would state – In common with all systems that have administration access (which is all). Rob – I can see the force of this argument. We've discussed this before with Tony. Although from a technical point of view admin access is not functionality, we decided that this argument would be overly technical and semantic in the eyes of the judge. Is the amended language above better?

>>> Suggest this.....

>>> As to paragraph 27, it is admitted that, ~~although Horizon was not designed to have this functionality~~ this would not usually be classified as "functionality", in common with other computer systems and not designed as part of Horizon functionality. there was IS a highly theoretical possibility that certain Fujitsu personnel could abuse their privileged user rights to circumvent the protections in the system as designed so as to edit or delete branch transaction data as described in paragraph [57(4)XX] above

R

From: Andrew Parsons (GRO)

Sent: 14 July 2017 14:39

To: Mark Underwood; Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; Mark Ellis; Melanie Corfield

Cc: Kevin Morgan; Amy Prime

Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

All

Thanks to all those who have commented so far. We're locking down the Defence at **9am on Monday** so that we can complete all the cross referencing and proof reading before the Tuesday deadline. If you have any final comments, please let us know before then.

Thanks
Andy

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From: Andrew Parsons
Sent: 12 July 2017 14:49
To: 'Mark Underwood'; Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; Mark Ellis; Melanie Corfield
Cc: Kevin Morgan; Amy Prime
Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

All

Please find attached the draft Defence for your review and comment. As discussed earlier, if possible please provide comments rather than amendments to the actual text. I've also attached the Claimants' Generic Particulars of Claim for reference.

You'll see a few points where input from Deloitte and Fujitsu is needed – we expect to get this today.

Please send any comments to me and Amy Prime (copied).

Thanks
Andy

From: Mark Underwood **GRO**
Sent: 12 July 2017 14:40
To: Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; Andrew Parsons; Mark Ellis; Melanie Corfield
Cc: Kevin Morgan
Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all, please find attached the open action list, which includes those taken today.

I have highlighted in yellow those that require people's imminent attention.

Many thanks

Mark



**2017 Winner of the Global Postal Award
for Customer Experience**

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From: Mark Underwood GRO

Sent: 11 July 2017 13:46

To: Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; 'Parsons, Andrew'; Mark Ellis; Melanie Corfield

Cc: Kevin Morgan

Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all, further to my note earlier today, please find attached the final Decision Paper.

Mark



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Mobile number: GRO

From: Mark Underwood GRO

Sent: 11 July 2017 09:30

To: Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; 'Parsons, Andrew'; Mark Ellis; Melanie Corfield

Cc: Kevin Morgan

Subject: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all,

We have a PLSG meeting on Wednesday 12 July @12 in Tonbridge (1.11). Ahead of that meeting please find attached:

1. The Agenda
2. Decision Paper: Access to Second Sight
3. Decision Paper: Standstill Agreement with Fujitsu
4. Decision Paper: Communications Strategy

5. Decision Paper: Wider Risks to POL [To follow later today]

6. Open actions list as at 11 July 2017

Please let me know if you are intending to dial in.

Many thanks, and apologies for the delay in circulating these papers.

Mark

GRO

Dial-in numbers:

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