

GMT

Witness Statement

(CJ Act 1967, s9; MC Act 1980, ss 5A(3)(a)
and 5B, MC Rules 1981, r 70)



Statement of	Penelope Anne Thomas	
Age if under 18	Over 18	(If over 18 insert 'over 18')

This statement (consisting of eight pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe true.

Dated the 17th day of June 2004

Signature **GRO**

I have been employed by Fujitsu Services, Post Office Account, formally ICL Pathway Ltd., since 20 January 2004 as an Information Technology (IT) Security Analyst responsible for audit data extractions and IT Security. I have working knowledge of the computer system known as Horizon, which is a computerised accounting system used by Post Office Ltd. I am authorised by Fujitsu Services to undertake extractions of audit data held on the Horizon system and to obtain information regarding system transaction information processed on the Horizon system.

Horizon's documented processes relate to each Post Office outlet. They state that at each Post Office, there are counter positions which each have a computer terminal, a visual display unit and a keyboard and printer. This individual system records all transactions input by the counter clerk working at that counter position. Each clerk logs on to the system by using their own unique password. The transactions performed by each clerk, and the associated cash and stock level information are recorded by the computer system in a stock unit. Once logged on, any transactions performed by the clerk must be recorded and entered on the computer and are accounted for within the user's allocated stock unit.

The Horizon system provides a number of daily and weekly records of all transactions input into it. It enables Post Office users to obtain computer summaries for individual clients of Post Office Limited e.g. National Savings Bank, Girobank, Driving Vehicle Licence Agency and the

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Continuation of statement of Penelope Anne Thomas

Department of Working Pensions (DWP). The Horizon system also enables the clerk to produce a weekly balance of cash and stock on hand combined with the other transactions performed in that accounting period.

Where local reports are required these are accessed from an icon on the desktop menu. The user is presented with a parameter driven menu, which enables the report to be customised to requirements. The report is then populated from transaction data that is held in the local database and is printed out on the tally roll printer. The system also allows for information to be transferred to the main accounting department at Chesterfield in order for the office accounts to be balanced.

The Post Office counter processing functions are provided through a series of counter applications: the Order Book Control Service (OBCS) that ascertains the validity of DWP order books before payment is made; the Electronic Point of Sale Service (EPOSS) that enables Postmasters to conduct general retail trade at the counter and sell products on behalf of their clients; the Automated Payments Service (APS) provides support for utility companies and others who provide incremental in-payment mechanisms based on the use of cards and other tokens and the Logistics Feeder Service (LFS) which supports the management of cash and value stock movements to and from the outlet, principally to minimise cash held overnight in outlets. The counter desktop service and the office platform service on which it runs provides various common functions for transaction recording and settlement as well as user access control and session management.

Information from counter transactions is written into a local database and then replicated automatically to databases on all other counters within a Post Office outlet. The information is then forwarded over ISDN (or other communication service) to databases on a set of central Correspondence Servers at the Fujitsu Services data centres. This is undertaken by a messaging transport system within the Transaction Management Service (TMS). Various systems then transfer information to Central Servers that control the flow of information to

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various support services. Details of outlet transactions are normally sent at least daily via the system. Details relating to the outlet's stock holding and cash account are sent weekly. Details are then forwarded daily via a file transfer service to the Post Office accounting department at Chesterfield and also, where appropriate, to other Post Office Clients.

An audit of all information handled by the TMS is taken daily by copying all new messages to archive media. This creates a record of all original outlet transaction details including its origin - outlet and counter, when it happened, who caused it to happen and the outcome. The TMS journal is maintained at each of the Fujitsu Services Data Centre sites and is created by securely replicating all transaction records that occurred in every Outlet. They therefore provide the ability to compare the audit track record of the same transaction recorded in two places to verify that systems were operating correctly. All exceptions are investigated and reconciled. Records of all transactions are written to audit archive media.

The Horizon system consistently records time in GMT and therefore takes no account of Civil Time Displacements. The clock incorporated into the desktop application on the counter visual display units is however configured to indicate local time. This has been the situation at Forest Gate (FAD 100002) since 31 January 2001 when the Horizon system was introduced at that particular Post Office.

The Order Book Control System (OBCS) software, linked to the Horizon system was developed in conjunction with the DWP. OBCS provides details of DWP order books on the national stop payment list, and, enables data regarding the movement of order books, and, encashments to be captured on their behalf. Each Horizon terminal at a Post Office counter has access to the national stop list through OBCS, when a barcoded DWP order book is scanned at the Post Office counter, or the order book details are manually keyed into Horizon at the Post Office counter. Each night, the national stop payment list is updated from information supplied electronically from the DWP computer centre. National stop payment list data is held centrally

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within the Horizon system, and is available to all Post Offices. However, certain information from the national stop payment list is also downloaded to individual Post Offices for faster access; this download process is called polling. The polling of individual Post Offices also involves receiving details of order book movements and encashments at Post Offices, centrally within Horizon, for onward transmission to the DWP.

I have access to reports that monitor faults, polling failures, equipment failures and calls for advice and guidance logged by the Horizon System Helpdesk. During 1 October 2002 and 31 January 2003, there were 13 calls from Forest Gate (FAD 100002) to the Helpdesk. They consisted of:-

Printer Problems - 8 calls were received as a result of the printer not printing for various reasons. These calls were logged on 2 October 2002, 4 October 2002, 18 October 2002, 29 October 2002, 28 November 2002, 14 December 2002, 09:13 17 January 2003 and 16:53 17 January 2003, when the printer was replaced.

Other Hardware Problems – 4 other hardware related calls were received. They were:-

21 January 2003 when a Bar Code Reader was not scanning;

13:03 23 January 2003 when an engineer installing a pinpad had the incorrect One Shot Password, and 14.03 23 January 2003 when the engineer again called for the correct One Shot Password to install the pinpad;

10:19 30 January 2003 when an auditor required a One Shot Password.

Software Problem – 09.16 30 January 2003 when Riposte error 1726 was experienced on counter 6. This is a known error - Known Error Log (KEL) title – KMRX (Key Management Distribution Receiver Service) Riposte Error 1726. This error message occurs when the KMRX Service attempts to connect before the Riposte Service is ready for connection. The counter was re-booted at 09:32 and the error was cleared. Counter 6 subsequently logged on at 10:23:13.

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Continuation of statement of Penelope Anne Thomas

None of these calls relate to faults which would have had an effect on the integrity of the information held on the system.

When information relating to individual transactions is requested, the data is extracted from the audit archive media via the Audit Workstations (AW's). Information is presented in exactly the same way as the data held in the archive although it can be filtered depending upon the type of information requested. The integrity of audit data is guaranteed at all times from its origination, storage and retrieval to subsequent despatch to the requester. Controls have been established that provide assurances to Post Office Internal Audit (POIA) that this integrity is maintained.

During audit data extractions the following controls apply :

1. Extractions can only be made through the AWs, which exist at Fujitsu Services, Forest Road, Feltham, Middlesex, Fujitsu Services, Lovelace Lane, Bracknell, Berkshire and the two Fujitsu Services Data Centres. These are all subject to rigorous physical security controls appropriate to that location. Specifically, the Feltham and Bracknell AWs – where most extractions take place – are located in a secure room subject to proximity pass access within a secured Fujitsu Services site.
2. Logical access to the AW and its functionality is managed in accordance with the Fujitsu Services, Post Office Account Security Policy and the principles of ISO 17799. This includes dedicated Logins, password control and the use of Microsoft Windows NT security features.
3. All extraction's are logged on the AW and supported by documented Audit Record Queries (ARQ's), authorised by nominated persons within Post Office Ltd. This log can be scrutinised on the AW.
4. Extractions are only made by authorised individuals.
5. Upon receipt of an ARQ from Post Office Ltd they are interpreted by CS Security. The details

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- are checked and the printed request filed.
6. The required files are identified and marked using the dedicated audit tools.
 7. Checksum seals are calculated for audit data files when they are written to audit archive media and re-calculated when the files are retrieved.
 8. To assure the integrity of the audit data while on the audit archive media the checksum seal for the file is re-calculated by the Audit Track Sealer and compared to the original value calculated when the file was originally written to the audit archive media. The result is maintained in a Check Seal Table.
 9. The specific ARQ details are used to obtain the specific data.
 10. The files are copied to the AW where they are checked and converted into the file type required by Post Office Ltd.
 11. The requested information is copied onto removal CD media, sealed to prevent modification and virus checked using the latest software. It is then despatched to the Post Office Ltd Casework Manager using Royal Mail Special Delivery. This ensures that a receipt is provided to Fujitsu Services confirming delivery.

ARQs 198, 199 and 200 were received on 23 July 2003 and asked for information in connection with the Post Office at Forest Gate (FAD 100002). The data was originally supplied to Post Office Ltd on 29 August 2003 by Neneh Lowther who is currently on **GRO** leave. I now produce a copy of ARQs 198, 199 and 200 as Exhibits PT/01, PT/02 and PT/03 respectively. On various dates and at various times between 13 May 2004 and 27 May 2004, I undertook extractions of data held on the Horizon system in accordance with the requirements of ARQs 198, 199 and 200 and followed the procedure outlined above. I produce the resultant CD as Exhibit PT/04. This CD contains additional transactional data to that which was originally supplied in August 2003.

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The report is formatted with the following headings:

- ID – relates to counter position
- User – Person Logged on to System
- SU – Stock Unit
- Date – Date of transaction
- Time – Time of transaction
- SessionId – A unique string relating to current customer session
- TxnId – A unique string relating to current transaction
- Mode – e.g. SC which translates to Serve Customer
- ProductNo – Product Item Sold
- Qty – Quantity of items sold
- SaleValue – Value of items sold
- Entry method - Method of data capture for OBCS Transactions (0 = barcode, 1 = manually keyed)
- State – Method of manual keyed Entry Method.
- IOP - Order Book Number
- Result – Order Book Transaction Result
- Foreign Indicator – Indicates whether OBCS payment was made at a local or foreign outlet (0- Local, 1- Foreign). The foreign indicator defaults to a '0' for all manually entered transactions.

The Event report is formatted with the following headings:

- Groupid – FAD code
- ID – relates to counter position
- Date – Date of transaction
- Time – Time of transaction
- User – Person Logged on to System
- SU – Stock Unit

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Continuation of statement of Penelope Anne Thomas

EPOSSTransaction.T – Event Description

EPOSSTransaction.Ti – Event Result

The CD (Exhibit PT/02) was sent to the Post Office Investigation section by Special Delivery on 27 May 2004.

There is no reason to believe that the information in this statement is inaccurate because of the improper use of the computer. To the best of my knowledge and belief at all material times the computer was operating properly, or if not, any respect in which it was not operating properly, or was out of operation was not such as to effect the information held on it. I hold a responsible position in relation to the working of the computer.

Any records to which I refer in my statement form part of the records relating to the business of Fujitsu Services. These were compiled during the ordinary course of business from information supplied by persons who have or may reasonably be supposed to have personal knowledge of the matter dealt with in the information supplied, but are unlikely to have any recollection of the information or cannot be traced. As part of my duties, I have access to these records.

Signature

GRO

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Signature witnessed by

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NOTE: This side B to be completed only when the original statement is overleaf. When this form is used to make a copy of a statement side B is to be left blank.

Address **GRO**

Mobile Tel No: Business telephone No: **GRO**

Occupation: **IT Security Analyst** Date and place of birth: **GRO**

Maiden name.: **Langley** Identity code:

Dates to be avoided. Delete dates of non availability of witness

Month of: July 2004							Month of: August 2004							Month of: September 2004						
1	X	3	4	5	6	7	1	2	3	4	5	X	7	1	2	X	4	5	6	7
8	X	10	11	12	13	14	8	X	10	11	12	X	14	8	9	X	11	12	13	14
15	X	17	18	19	20	21	15	16	17	18	19	X	21	15	16	X	18	19	20	21
22	X	24	25	26	27	28	22	23	24	25	26	X	28	22	23	X	25	26	27	28
29	X	31					29	30	31					29	30					
Month of: October 2004							Month of: November 2004							Month of: December 2004						
X	2	3	4	5	6	7	1	2	3	4	X	6	7	1	2	X	4	5	6	7
X	9	10	11	12	13	14	8	9	10	11	X	13	14	8	9	X	11	12	13	14
X	16	17	18	19	20	21	15	16	17	18	X	20	21	15	16	X	X	X	X	X
X	23	24	25	26	27	28	22	23	24	25	X	27	28	X	X	X	X	X	X	X
X	30	31					29	30						X	X	X				

Contact point, if different from above: **Security Manager, Post Office Account, Fujitsu Services**

Address: **GRO**

Telephone No: **GRO**
Mobile No:

STATEMENT TAKEN BY (print name)

Office

Witness Statement

(CJ Act 1967, s9; MC Act 1980, ss 5A(3)(a)
and 5B, MC Rules 1981, r 70)

Statement of **William Leslie Mitchell**

Age if under 18 Over 18 (If over 18 insert 'over 18')

This statement (consisting of pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe true.

Dated the 17th day of June 2004

Signature **GRO**

I have been employed by Fujitsu Services, Post Office Account, formally ICL Pathway Ltd., since the 22nd September 2003 as Security Manager where I am responsible for IT Security and the Audit Retrieval Query service. I have working knowledge of the computer system known as Horizon, which is a computerised accounting system used by Post Office Ltd. I am authorised by Fujitsu Services to undertake and supervise extractions of audit data held on the Horizon system and to obtain information regarding system transaction information processed on the Horizon system.

Further to the statements submitted by Beatrice Neneh Lowther and Penelope Anne Thomas regarding extraction of data for ARQ's 198, 199 and 200 relating to Forest Gate Post Office, FAD Code 100002. I confirmed that at Fujitsu Services, Forest Road, Feltham, TW13 7EJ between the 25th and the 28th May 2004 I carried out a comparison of the Forest Gate ARQ data as extracted by Beatrice Neneh Lowther and forwarded to Post Office Limited as Exhibits NL/1B, NL/2B and NL/3B and the Forest Gate ARQ as extracted by Penelope Anne Thomas and submitted to Post Office Limited on the 27th May 2004 as Exhibit PT/02. The recreation of the data and the check was due to Beatrice Neneh Lowther's absence on **GRO** leave and the possibility of a witness being required to attend a planned court date.

These comparison checks revealed the following omissions in the data provide by Beatrice Neneh Lowther as Exhibits NL/1B, NL/2B and NL/3B. This request is split over 3 ARQ, No's 198, 199 & 200 as follows.

Signature **GRO**

Signature witnessed by **GRO**

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Continuation of statement of William Leslie Mitchell

ARQ 198 – The ARQ covers the period 14/10/02 to 13/11/2002, totalling 31 query days. The root cause for the omission of data from this ARQ is that the retrieval was executed as a single task with the resultant data retrieval exceeding the available 100Gb limit of the Message Store area on the Audit Server. This forced the Audit Server to randomly drop 11,135 data entries. A total of 10 days were affected these dates are:

16/10 – Partial, no end of day

17/10 – Partial, no end of day

19/10 – No data retrieved.

21/10 – Partial, no end of day

22/10 – Partial, no end of day

23/10 – Partial, no end of day

25/10 – Partial, no end of day

26/10 – No data retrieved

29/10 – No data retrieved

30/10 – Partial, no end of day

ARQ 199: The ARQ covers the period 14/11/02 to 11/12/2002, totalling 28 query days. The root cause for the omission of data from this ARQ is when an ARQ is retrieved it is necessary to add additional days to the end of the requested date span to ensure a full and complete capture of the data which may have been harvested at different times. The operator should then confirm that an end of day log off is present and extract only the required data files. In this case the operator added two additional days to each ARQ, which is normally sufficient, but it appears did not confirm that an end of day log off was present, consequently an additional 235 data entries were not included in the data extraction. The affected date was 27/11/2002 – Partial, no end of day.

ARQ 200: The ARQ covers the period 12/12/2002 to 08/01/2003, totalling 28 query days. The root cause for the omission of data from this ARQ was the same as ARQ 199 above and 679

Sign

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CS01

version 3.0 11/02

Witness Statement

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Continuation of statement of William Leslie Mitchell

additional data entries were not included in the data extraction. The affected date was 03/01/2003 – Partial, no end of day.

All records to which I refer in my statement form part of the records relating to the business of Fujitsu Services. These were compiled during the ordinary course of business from information supplied by persons who have or may reasonably be supposed to have personal knowledge of the matter dealt with in the information supplied, but are unlikely to have any recollection of the information or cannot be traced. As part of my duties, I have access to these records. Having reviewed both sets of data I have confirmed that the omissions made within the data provided by Beatrice Neneh Lowther have not been repeated in the ARQ data provided by Penelope Anne Thomas as Exhibit PT/02 and that the data is complete in accordance with the original ARQ.

Sign

GRO

Signature witnessed by

GRO

CS01

Version 3.0 11/02