

THE QUEEN

v

SEEMA MISRA

TAKE NOTICE that, in addition to the evidence before the Magistrates' Court, further evidence, the effect of which is set out herein, may be given at the trial.

DATED this 26th day of February 2010

To: the Solicitors acting
for the Defendant
and to the Court

Signed J SINGH

for General Counsel to Royal Mail Group Limited
Legal Services
6a Eccleston Street
LONDON
SW1W 9LT

THE QUEEN v SEEMA MISRA

LIST OF WITNESSES

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NAME AND ADDRESS OF PROSECUTING SOLICITOR
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Witness Statement

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



Statement of Andrew Paul Dunks

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

This statement (consisting of 32 pages 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 29th day of January 2010

Signature

Further to my statement of 24th June 2009, I would now like to add the following.

I have been employed by Fujitsu Services (Fujitsu), Post Office Account, since 11 March 2002 as an IT Security Analyst where I am involved in IT Security for the Post Office Account. I have a 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 to undertake extractions of audit data held on the Horizon system and to obtain information regarding system transaction information processed on the Horizon system.

I make this Witness Statement from facts within my own knowledge unless otherwise stated. Any records to which I refer in my statement form part of the records relating to the business of Fujitsu. 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, since the nature of the helpdesk involves many engineers all at differing levels and any number could be involved in a particular call. As part of my duties, I have access to these records, but I was not involved with any of the technical aspects of these calls. This area is not my particular area of expertise and I make this witness statement simply to help clarify the call logs for the benefit of the Court.

Signature

Signature witnessed by

Witness Statement

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

Continuation of statement of Andy Dunks

An important element of the support provided to sub-postmasters and Counter Clerks is the Horizon System Helpdesk (HSH). The HSH is the Horizon user's first 'port of call' in the event of their experiencing a problem with the Horizon system or requiring advice and guidance. If the system were to malfunction, upon discovery the Horizon users (i.e. the sub-postmaster or counter clerk) would raise a call to the HSH seeking clarification or advice. HSH is a service run by Fujitsu Services for the Post Office. I have been asked to provide information pertaining the working condition of the Horizon system. The following information constitutes the calls logged by HSH recorded during the period **June 30th 2005 to December 31st 2009** for the **West Byfleet** Post Office – Branch Code **126023**.

I have reviewed the HSH calls pertaining to the **West Byfleet** branch during the period **June 30th 2005 to January 14th 2008**. There were **135** calls from branch Code **126023** to the HSH, this equates to between 3 and 4 calls a month which is average for this size Post Office. All the calls are of a routine nature and do not fall outside the normal working parameters of the system or would affect the working order of the counters.

Call reference details and an overview of each call are given in date order below:

There are a many abbreviations that the HSH use in their call details, here are many explained:

NBSC - Network Business Support Centre

PM – Post Master

CC – Counter Clerk

Bop – Back office printer

CP- Counter printer

ADSL - Asymmetric Digital Subscriber Line (network connection)

PWWDCR - Wait While Desktop Connects To Riposte

BU – Base Unit (counter)

PMMC - Postmaster Memory Card

Ithaca – make of printer

Signature

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Witness Statement

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

Continuation of statement of Andy Dunks

MLP – mail label print
OSP – One Shot Password
EOD – End of Day
BCR - Bar Code Reader
PMHTCC – Post master happy to close call
SSC - System Support Centre 3rd/4th line support

1. Sat 09 July 2005 11:17 Call E-0507090180

pm states that they cannot access training.

Resolution: Sat 09 July 2005 11:18

Call Close by Mark Outram: contact the nbsc

Outcome

Call passed to NBSC

2. Fri 29 July 2005 17:47 Call E-0507290644

no power to horizon

Resolution: Fri 29 July 2005 17:50

Call Close by Jason Rogers: cc states that has a frozen screen whilst doing a transaction. reboot required. ref offered

Outcome

System freeze resolved by a reboot.

3. Fri 26 August 2005 09:05 Call E-0508260113

pm states screen has forzen during reboot

Resolution: Fri 26 August 2005 09:08

Call Close by Holly Andrew: pm states screen has frozen during reboot advised pm to reboot

Outcome

PM advised to reboot system.

4. Thu 15 September 2005 17:44 Call E-0509150698

PM states that the bop is printing faintly, has changed toner and it is only a bit better

Resolution: Thu 15 September 2005 17:53

Call Close by Nicola Howe: PM states that her bop is printing faintly, advised her to get a new image drum, ref no given

Outcome

PM advised to order new part for printer.

Signature

Signature witnessed by

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Version 4.0 07/06

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Witness Statement

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

Continuation of statement of Andy Dunks

5. Mon 19 September 2005 10:44 Call E-0509190463

PM reports CP isn't accepting MLPs

Resolution: Tue 20 September 2005 08:46

Call Close by Russell Bull: Engineer replaced the counter printer.. Call closure code of and repair code 821

Outcome

Printer replaced.

6. Tue 20 September 2005 10:10 Call E-0509200234

BOP - makes grinding noises - red light flashes -

Resolution: Tue 20 September 2005 10:12

Call Close by Imran Hussain: BOP - makes grinding noises - red light flashes - advised change drumkit/toner - pm to order from communisis

Outcome

PM advised to change printer parts.

7. Wed 21 September 2005 10:42 Call E-0509210435

Link call e-0509200234 pm has changed the image drum and toner as requested. the new image drum prints black marks as before.

Resolution:

Call Close by Mark Brown: swapped bop Call closure code of and repair code 821

Outcome

Back office printer replaced.

8. Fri 23 September 2005 17:32 Call E-0509230688

pm states her power went and is getting power company to sort out

Resolution: Fri 23 September 2005 17:35

Call Close by Akram Ali: pm states her power went and is getting power company to sort out. advised pm to call us and power up when back

Outcome

PM advising that they have had a power loss.

9. Sat 24 September 2005 09:54 Call E-0509240165

PO closed today due to flood - power will be off during this period. PO may re-open Monday 26th Sept.

Resolution: Tue 04 October 2005 13:09

Call Close by Andrew Smith: Office closed due to flood, office re-opened on 27/09

Outcome

PO closed due to flood.

Signature

Signature witnessed by

CS011A

Version 4.0 07/08

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Witness Statement

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

Continuation of statement of Andy Dunks

10. Mon 26 September 2005 09:11 Call E-0509260175

Counter Printer - no power

Resolution: Mon 26 September 2005 11:54

Call Close by Kenneth Hudson: replaced fuse on power cable plug. Call closure code of and repair code 824

Outcome

Engineer replaced fuse in printer plug.

11. Mon 03 October 2005 11:24 Call E-0510030449

Leslie @ nbsc states that the site reopened on the 27th of september@ 0900

Resolution:

Call Close by Thomas Field: site is now open - it reopened on the 27th of September

Outcome

Call to say that site opened after flood.

12. Thu 06 October 2005 09:40 Call E-0510060251

OSP for Seema misra PM

Resolution: Thu 06 October 2005 09:54

Call Close by Darryl Johnson: OSP has been issued

Outcome

One-Shot Password supplied.

13. Fri 14 October 2005 11:40 Call E-0510140339

FAD non polling, please investigate

Resolution: Fri 14 October 2005 16:37

Call Close by Sarah Dawe: Site Communicating. EOD received

Outcome

PM states that there was a power cut, counters rebooted and network restored.

14. Mon 17 October 2005 11:05 Call E-0510170416

caller is restarting the computer and he had a blue screen but now it has gone to system busy

Resolution: Mon 17 October 2005 11:10

Call Close by Erica Tidman: system busy, adv pm this is part of normal reboot, ref given

Outcome

PM advised that reboot process is ok.

15. Sat 05 November 2005 09:57 Call E-0511050159

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Witness Statement

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

Continuation of statement of Andy Dunks

PM states touch screen is not responding

Resolution: Sat 05 November 2005 10:01

Call Close by Matthew Wilson: Touch screen not working. clean touch screen and recalibrated. screen now working

Outcome

Cleaned touch screen and recalibrated

16. Sat 05 November 2005 10:01 Call E-0511050165

BCR not working

Resolution: Sat 05 November 2005 10:02

Call Close by Matthew Wilson: BCR not working, cleaned lens and rebooted

Outcome

PM advised to clean BCR and reboot.

17. Wed 16 November 2005 09:20 Call E-0511160161

pm states he has discrepancy on system

Resolution: Wed 16 November 2005 09:21

Call Close by Akram Ali: pm states discrepancy on system advised pm to call nbsc

Outcome

Call passed to NBSC.

18. Wed 23 November 2005 10:05 Call E-0511230280

PM reports that CP isn't working.

Resolution: Wed 23 November 2005 10:08

Call Close by Barrie Curtin: pm reports that CP isn't working. Advised through checks. pm will continue unassisted and come back to us

Outcome

PM advised to carry out checks on the printer.

19. Fri 25 November 2005 16:47 Call E-0511250758

Clerk states CP is not printing mail labels

Resolution: Mon 28 November 2005 12:12

Call Close by David Dawe: Engineer replaced the counter printer. Call closure code of and repair code 821

Outcome

Printer replaced.

Signature

Signature witnessed by

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Version 4.0_07/06

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Witness Statement

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

Continuation of statement of Andy Dunks

20. Fri 25 November 2005 16:53 Call E-0511250761

Clerk states touch screen is not responding

Resolution: Fri 25 November 2005 16:57

Call Close by Matthew Wilson: Touch screen not responding. Cleaned screen and failed recalibration. Advised reboot. ref no given

Outcome

Clerk advised to reboot after recalibration of screen failed.

21. Mon 05 December 2005 18:17 Call E-0512051031

pm did a cash declaration. the machine started to make a noise.

Resolution: Tue 06 December 2005 12:05

Call Close by Mark Brown: @@CHARGE no fault found. Call closure code of and repair code 819

Outcome

Counter replaced and events checked, no errors.

22. Tue 06 December 2005 09:54 Call E-0512060215

Node 3 is non-polling, please investigate.

Resolution: Tue 06 December 2005 11:59

Call Close by Sarah Dawe: Site Communicating. EOD received

Outcome

No Fault appears to be found, connection back up after 2hrs.

23. Sat 17 December 2005 10:26 Call E-0512170158

swiss francs given to colleague - trying to transfer ands not in dropdown list

Resolution: Sat 17 December 2005 10:28

Call Close by Imran Hussain: Swiss francs given to colleague - trying to transfer ands not in dropdown list - advised reboot - pm to reboot unassisted

Outcome

PM advised to reboot to fix problem.

24. Tue 10 January 2006 09:03 Call E-0601100096

the online services are down.

Resolution: Tue 10 January 2006 09:27

Call Close by Anthony Vasse: pm has rebooted to clear a network failure.

Outcome

Pm advised to reboot to restore online services.

25. Mon 20 February 2006 10:42 Call E-0602200350

pm states that showing £ 6000 down from balance..

Signature

Signature witnessed by

CS011A

Witness Statement

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

Continuation of statement of Andy Dunks

Resolution: Mon 20 February 2006 10:44

Call Close by Joanne Rowland: pm states that showing £ 6000 down from balance. advised nbsc issue

Outcome

Call passed to NBSC

26. Mon 20 February 2006 10:45 Call E-0602200355

pm states that showing £ 6000 down from balance..advised nbsc issue pm stated she was talking to the nbsc and got cut off

Resolution: Mon 20 February 2006 10:48

Call Close by Laura Sutton: pm states that showing £ 6000 down from balance..advised nbsc issue pm stated she was talking to the nbsc and got cut off i advised pm i would put her through pm was happy with this .pmhtcc

Outcome

PM call passed through NBSC.

27. Mon 20 February 2006 15:40 Call E-0602200818

Pm states that her system is showing difference values for certain products.

Resolution: Mon 20 February 2006 15:42

Call Close by Matthew Fry: Pm states that her system is showing incorrect values. Pm transferred.

Outcome

Call passed toNBSC.

28. Tue 21 February 2006 12:45 Call E-0602210464

PM states that the last couple of weeks they have had problems with the horizon kit and it is always showing that they are down in money

Resolution: Tue 21 February 2006 12:54

Call Close by Samantha Roullier: PM states that that system is showing her as being down everyday, she has been advised by the NBSC, advised PM to follow this, REF offered

Outcome

Advised to follow NBSC instructions.

29. Thu 23 February 2006 08:59 Call E-0602230104

annetee nbsc - pm states that she has losses every week in two stock units

Resolution: Fri 03 March 2006 13:55

Call Close by David Dawe: pm was getting discrepancy's ssc have investigated and advised that the NBSC take a 2nd look at this as the office stock units appear to be in a mess.

Outcome

SSC team advice that call be passed back to NBSC for further investigation.

30. Sat 04 March 2006 10:40 Call E-0603040153

Pm states that her cp is not feeding.

Signature

Signature witnessed by

CS011A

25

Witness Statement

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

Continuation of statement of Andy Dunks

Resolution: Sat 04 March 2006 14:27

Call Close by Stephen Ashby: ** [Engineer 000163 allocated]. Call closure code of and repair code 821

Outcome

Printer replaced.

31. Wed 15 March 2006 09:13 Call E-0603150177

pm states that the system are slowing during transaction

Resolution:

Call Close by Rhian Shirley: pm states they have a slow counter. after checking event advise pm to keep a record for future calls as there is no fault. pm happy

Outcome

No fault found, PM advised to keep records of any future slow counters.

32. Wed 15 March 2006 13:36 Call E-0603150530

PM states nvl and A&L are declining

Resolution:

Call Close by Kenneth Hudson: ** [No Remark entered.] Call closure code of FAILURE and repair code 821

Outcome

PinPad not reading cards,,, PinPad replaced by engineer.

33. Wed 15 March 2006 13:42 Call E-0603150536

PM states no cards are being taken on the pinpad

Resolution:

Call Close by Kenneth Hudson: engineer swapped pinpad. tested ok. Call closure code of and repair code 821

Outcome

Faulty pinpad replaced

34. Fri 24 March 2006 09:51 Call E-0603240249

Pm states that the cps on nodes 1+3 are not printing labels and keep rejecting them.

Resolution: Fri 24 March 2006 14:09

Call Close by Darren Budge: swapped Printer, tested ok Call closure code of and repair code 821

Outcome

Counter printers replaced.

35. Fri 24 March 2006 10:04 Call E-0603240273

Pm states that the cp on node 1 is not printing labels.

Resolution:

Call Close by Darren Budge: swapped printer, tested ok Call closure code of and repair code 821

Signature

Signature witnessed by

CS011A

26

Witness Statement

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

Continuation of statement of Andy Dunks

Outcome

Printer replaced.

36. Fri 24 March 2006 17:26 Call E-0603240820

'Nothing that can be settled or refund with the method of payment' using card on Bureau transaction.

Resolution: Fri 24 March 2006 17:30

Call Close by Ricki Law: error on bureau transaction. advised this is nbsc issue, pm transferred

Outcome

Call transferred to NBSC

37. Wed 19 April 2006 12:10 Call E-0604190327

pm states cp is not printing mlps

Resolution: Wed 19 April 2006 12:10

Call Close by Sarah Dawe: engineer replaced ithaca tested ok Call closure code of and repair code 821

Outcome

Printer replaced.

38. Tue 02 May 2006 05:02 Call E-0605020017

Critical Alert Received on H12602300101 on 02/05/2006 at 03:45:10. Event Description: A fatal error has occurred. A corrupt storage unit was detected on volume %1 with LPN %2. UnitType %3 (0xC105003F). The message store will be shut down abnormally

Resolution: Tue 02 May 2006 10:07

Call Close by Mary Rainbow: engineer call raised on fad/fad call - this call can be closed

Outcome

Subsequent call raised e-0605020278, where engineer replaced ADSL cable and tested ok.

39. Tue 02 May 2006 08:56 Call E-0605020144

PM states that she has no entry signs on all icons.

Resolution: Tue 02 May 2006 08:59

Call Close by Louise Peplow: PM states that she has no entry signs on all icons. Advised pm to re-boot the counter and to call back if there are any further issues.

Outcome

PM advised to reboot..

40. Tue 02 May 2006 09:39 Call E-0605020278

PM states that she still keeps getting message please wait while desktop connects to riposte

Resolution: Tue 02 May 2006 13:19

Signature

Signature witnessed by

CS011A

27

Witness Statement

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

Continuation of statement of Andy Dunks

Call Close by Kenneth Hudson: engineer swapped adsl cable. tested ok. Call closure code of and repair code 824

Outcome

This call raised in conjunction with Call E-0605020017, cable replaced and tested ok.

41. Tue 02 May 2006 18:20 Call E-0605021966

Critical NT event at 18:05:51 02/05/06 on H -12602300101 KMRX: Riposte Error 1722. server is unavailable. (0x6BA) Riposte Close Message Port

Resolution: Wed 03 May 2006 12:37

Call Close by Darren Dutton: Reboot event received at 12:27:00. No further events to report

Outcome

This is a known error and a reboot is suggested, there were no further events to report. Repeat call E-0605030184.

42. Wed 03 May 2006 08:59 Call E-0605030155

pm states PWWDCR

Resolution: Wed 03 May 2006 09:01

Call Close by Stephen Ashby: pm states pwwdctr. reboot required. ref no offered

Outcome

This is a known error and a reboot is suggested

43. Wed 03 May 2006 09:07 Call E-0605030184

PM states the " on line services unavailable "

Resolution: Wed 03 May 2006 09:11

Call Close by Melanie Connolly: PM states " server unavailable, . advised reboot, ref offered

Outcome

This is a known error, call in conjunction with Call E-0605021966, advised to reboot.

44. Wed 03 May 2006 09:34 Call E-0605030277

pm states that she has message frozen on screen pwwdctr (Please Wait While Desktop Connects To Riposte).

Resolution: Wed 03 May 2006 14:08

Call Close by Katrina Brooks: swapped b-base, tested ok

Outcome

Base Unit replaced, reboots for calls Call E-0605030184, Call E-0605030155 and Call E-0605021966 failed to rectify problem so the counter was replaced and tested ok.

45. Sat 17 June 2006 09:19 Call E-0606170102

The online services are down. pm has pwwdctr on the gateway.

Resolution: Sat 17 June 2006 09:21

Call Close by Anthony Vasse: pm is rebooting to clear pwwdctr.

Signature

Signature witnessed by

CS011A

28

Witness Statement

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

Continuation of statement of Andy Dunks

Outcome

PM advised to reboot to fix.

46. Mon 03 July 2006 16:27 Call E-0607031108

caller states he is doing a capo card transaction and is getting message card cannot be processed by the pinpad

Resolution: Mon 03 July 2006 16:30

Call Close by Patricia Clegg: card not going through on 2 counters, fault with card

Outcome

Problem with the credit card.

47. Sat 08 July 2006 13:54 Call E-0607080339

Caller states that the counter has frozen

Resolution: Sat 08 July 2006 13:56

Call Close by Adam Robertson: Reboot required

Outcome

PM advised to reboot.

48. Wed 12 July 2006 13:46 Call E-0607120645

no power to horizon

Resolution: Wed 12 July 2006 13:48

Call Close by Imran Hussain -: no power to horizon - referred to local electrician

Outcome

Electrical problem - referred to local electrician

49. Wed 12 July 2006 13:59 Call E-0607120672

pm states there is no power to horizon system.

Resolution: - Wed 12 July 2006 14:03

Call Close by Keely Butler: pm states there is no power to horizon system. transf to nbsc.

Outcome

Call passed to NBSC.

50. Wed 12 July 2006 14:04 Call E-0607120680

PM states that the power has gone down on all of the counters - have checked the trip switch to the horizon counters and it is fine and an electrician has had a look at the fuses - all appears to be fine

Resolution: Wed 12 July 2006 14:12

Call Close by Adam Robertson -: No fault found - Trip switch had not been checked

Outcome

Signature

Signature witnessed by

CS011A

29

Witness Statement

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

Continuation of statement of Andy Dunks

No Fault found, PM happy to close call.

51. Fri 21 July 2006 09:09 Call E-0607210115

Pm states that touch screen is faulty

Resolution: - Fri 21 July 2006 09:13

Call Close by Melissa Delamaine: touch screen fault, recalibrated, now fine, ref no given

Outcome

Touch screen reset.

52. Tue 25 July 2006 09:57 Call E-0607250218

caller states that the touch screen is not working, the arrow does not follow your finger

Resolution: - Thu 27 July 2006 17:03

Call Close by Samantha Roullier: engineer replaced touch screen tested ok Job Completed: 27/07/2006 14:55:00 Call closure code of Completed and repair code 821

Outcome

Touch screen replaced by engineer.

53. Mon 14 August 2006 11:52 Call E-0608140565

FAD non polling, please investigate

Resolution: - Tue 15 August 2006 09:05

Call Close by Leanne Hudson: Site Communicating. EOD received

Outcome

PM stated that the electrician who was fitting the Air con unit cut the power off yesterday.

54. Fri 22 September 2006 09:37 Call E-0609220246

caller states that the counter printer on node 2 is not printing the receipt. there is no power to the printer.

Resolution: - Tue 26 September 2006 10:37

Call Close by Kenneth Hudson: Engineer Summary: poor & cuts out exchange & tested ok rtc 1009 Call closure code of Completed and repair code 821

Outcome

Printer replaced by engineer

55. Mon 25 September 2006 16:03 Call E-0609250857

clerk states that cp is not working and is only printing half receipt

Resolution: Tue 26 September 2006 11:33

Call Close by David Dawe -: Engineer Summary: exchange & tested ok Call closure code of Completed and repair code 821

Outcome

Printer replaced by engineer

Signature

Signature witnessed by

CS011A

30

Witness Statement

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

Continuation of statement of Andy Dunks

56. Fri 29 September 2006 13:28 Call E-0609290473

PM states that her CP was replaced last week and keeps jamming.

Resolution: - Sat 30 September 2006 17:53

Call Close by Ricki Law: ** [No Remark entered.] Call closure code of Completed and repair code 821

Outcome

Counter Printer repaired.

57. Thu 05 October 2006 11:59 Call E-0610050525

Caller states that node 2 touch screen is not working

Resolution:

Call Close by Adam Robertson: replaced touch screen and mains adaptor Call closure code of Completed and repair code 821

Outcome

Touch screen replaced by engineer.

58. Wed 08 November 2006 16:40 Call E-0611080875

the scanner is not working properly.

Resolution:

Call Close by Anthony Vasse: pm is rebooting to clear a scanner issue on node 3.

Outcome

Counter rebooted to clear scanner problem.

59. Thu 09 November 2006 09:57 Call E-0611090270

pm states bcr not working

Resolution: - Thu 09 November 2006 09:59

Call Close by Akram Ali: pm states system is stuck in loop, advised reboot pmhtcc

Outcome

PM happy to close call after reboot of counter to resolve Bar Code Ready (BCR) problem.

60. Sat 11 November 2006 11:04 Call E-0611110242

pm states that the bcr is still not working

Resolution: - Mon 13 November 2006 13:01

Call Close by Nicola Whitehead: ** [No Remark entered.] Call closure code of Completed and repair code 821

Outcome

Part replaced.

61. Fri 24 November 2006 13:10 Call E-0611240549

Signature

Signature witnessed by

CS011A

31

Witness Statement

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

Continuation of statement of Andy Dunks

Cc states cp is not printing labels

Resolution:

Call Close by David Moulden: REPLACED PRINTER Call closure code of Completed and repair code 821

Outcome

Part replaced.

62. Wed 29 November 2006 14:25 Call E-0611290624

CC states that the node 1 printer is not working

Resolution: - Wed 29 November 2006 14:31

Call Close by Samantha Roullier: PM states that the printer is not working, advised to reset,ref offered

Outcome

PM advised how to perform factory reset of the printer.

63. Wed 29 November 2006 15:49 Call E-0611290763

CC quotes E-0611290624. CP is still not working after initial checks and factory reset.

Resolution: Thu 30 November 2006 13:00

Call Close by Katrina Brooks -: rtc 09:55 Engineer Summary: the unit was rejecting the labels so the engineer replaced and tested fine. Call closure code of Completed and repair code 821

Outcome

Printer replaced.

64. Thu 07 December 2006 09:36 Call E-0612070206

Caller states that the counter keeps on turning itself off during transaction

Resolution: - Fri 08 December 2006 17:06

Call Close by Donna Thomas: Job Completed: 08/12/2006 15:30:00 Engineer Summary: counter would cut out, and CTX mains had low voltage, swapped part tested ok Call closure code of Completed and repair code 821

Outcome

Base Unit (counter) replaced by engineer.

65. Mon 15 January 2007 14:22 Call E-0701150667

pm states that her pinpad is not reading cards

Resolution: - Mon 15 January 2007 16:02

Call Close by Samantha Bowden: pm states that her pinpad is not accepting cards, advised re-installation of pinpad, pm happy to do this unassisted

Outcome

PM advised to re-install pinpad.

Signature

Signature witnessed by

CS011A

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Witness Statement

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

Continuation of statement of Andy Dunks

66. Mon 15 January 2007 16:05 Call E-0701150810

pm states that the pinpad installation failed as it failed to read the text card.

Resolution:

Call Close by Alexander Gibbs: swapped pinpad Call closure code of completed and repair code 821

Outcome

PinPad replaced by engineer.

67. Wed 24 January 2007 14:17 Call E-0701240721

CC states that Node 1 CP is not printing properly.

Resolution:

Call Close by Stephanie Byrne: CC states that CP on node 1 is jamming, advised a factory reset this was successful. ref given

Outcome

PM advised to reset printer, which cleared problem.

68. Wed 24 January 2007 14:25 Call E-0701240731

CC states that the BCR is not scanning

Resolution: - Wed 24 January 2007 14:33

Call Close by Stephanie Byrne: CC states that BCR on node 3 is not scanning, Advised CC to reboot and call back in 20 mins if problem still persists. ref given

Outcome

Counter Clerk rebooted BCR.

69. Mon 29 January 2007 10:59 Call E-0701290399

Pm states that his cp is still not printing labels

Resolution: Tue 30 January 2007 14:18

Call Close by Joseph Mould: Engineer Summary: not printing labels exchanged tested all ok Call closure code of completed and repair code 821

Outcome

Printer replaced.

70. Thu 15 February 2007 13:11 Call E-0702150566

Sup states that his is it not printing lables

Resolution: Sat 17 February 2007 13:40

Call Close by Joseph Mould: Call closure code of completed and repair code 821

Outcome

Printer replaced.

71. Mon 19 February 2007 12:17 Call E-0702190608

Signature

Signature witnessed by

CS011A

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Witness Statement

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

Continuation of statement of Andy Dunks

CC states that her cp is not printing labels

Resolution: Wed 21 February 2007 09:32

Call Close by Joseph Mould: ** [No Remark entered.] Call closure code of completed and repair code 821

Outcome

Counter printer replaced.

72. Thu 01 March 2007 09:14 Call E-0703010170

CC states that her BCR is not working

Resolution: Thu 01 March 2007 09:24

Call Close by Latoya Rodgers: CC states that her BCR is not working ,advice her of the steps and advice her to reboot and then try it and if it doesn't wrk then she needs to ring us back . ref given

Outcome

PM advised to reboot and try again.

73. Tue 06 March 2007 16:23 Call E-0703060844

pm states cp started smoking

Resolution: Wed 07 March 2007 15:32

Call Close by Tracy Scott: Engineer Summary: not print slips or labels, exchanged & tested all ok

Outcome

Counter printer replaced

74. Mon 12 March 2007 15:14 Call E-0703120773

CC states that her cp keeps rejecting labels.

Resolution: Wed 14 March 2007 10:51

Call Close by Sukhdeep Thind: Engineer Summary: Rejecting labels so replaced and tested ok. Call closure code of FAILURE and repair code 821

Outcome

Printer replaced.

75. Thu 26 April 2007 13:50 Call E-0704260661

CC states that her online services are unavailable.

Resolution: Fri 27 April 2007 09:47

Call Close by Stephanie Byrne: PM now has online services

Outcome

Loss of network connectivity, connection restored after reboot.

76. Sat 28 April 2007 09:59 Call E-0704280155

pm states that node disconnected and regained connection errors

Resolution: Sat 28 April 2007 10:01

Call Close by Joanne Rowland: pm states that nodes are all working and fine were disconnected but ok pmhtcc ref given

Signature

Signature witnessed by

CS011A

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Witness Statement

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

Continuation of statement of Andy Dunks

Outcome

Brief loss of network connectivity.

77. Thu 03 May 2007 12:01 Call E-0705030652

CC states that her cp on node 3 has no power.

Resolution: Thu 03 May 2007 14:16

Call Close by Sukhdeep Thind: pm called. can we cancel the engineer visit. the printer is now working.

Outcome

Printer problem.

78. Wed 20 June 2007 14:42 Call E-0706200766

Counter clerk states the cp is not working

Resolution: Wed 20 June 2007 15:01

Call Close by Nazma Majeed: Counter clerk states the cp is not working. Advised to reboot and call back if the problem persists. Ref given

Outcome

Printer problem.

79. Wed 20 June 2007 15:09 Call E-0706200812

pm needs to know how to reboot the counter for epson printer problem

Resolution: Thu 03 May 2007 14:16

Call Close by Ricki Law: pm needs to know how to reboot the counter for epson problem. advised how to reboot

Outcome

Printer problem.

80. Thu 05 July 2007 08:48 Call E-0707050086

the gateway is not switching on after a power failure.the screen is blank.

Resolution: Thu 05 July 2007 17:11

Call Close by Latoya Rodgers: Engineer Summary: power failed and has been changed and has been tested ok

Outcome

Base unit replaced by engineer.

81. Wed 11 July 2007 17:18 Call E-0707110847

sub pm states that node 1 screen is not responding .

Resolution: Wed 11 July 2007 17:21

Call Close by Latoya Rodgers: sub pm states that her screen is not responding . walk through the checks and it is working . ref given

Signature

Signature witnessed by

CS011A

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Witness Statement

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

Continuation of statement of Andy Dunks

Outcome

Walked through checks and tested ok.

82. Sat 14 July 2007 10:39 Call E-0707140168

No response when touching the screen. KB is working.

Resolution: Mon 16 July 2007 18:07

Call Close by Joseph Mould: Engineer Summary: Touch screen calibration failed - replaced screen - tested and ok

Outcome

Screen replaced by engineer.

83. Thu 19 July 2007 11:14 Call E-0707190374

Pm states on node 2 touch screen is not responding at all 3910000056
MON0900TUE0900WED0900THU0900FRI0900SAT0900SUN0000BNK0000 3920000056
MON0000TUE0000WED0000THU0000FRI0000SAT0000SUN0000BNK0000 3930000056
MON0000TUE0000WED0000THU0000FRI0000SAT0000SUN0000BNK0000 3940000056
MON1730TUE1730WED1730THU1730FRI1730SAT1300SUN0000BNK0000

Resolution: Thu 19 July 2007 11:18

Call Close by Kam Seshadri: Pm had a problem with the touch screen, advised calibration, calibration ok and found touch screen seemed to be working fine

Outcome

Touch screen problem, fixed by re-calibration.

84. Wed 01 August 2007 14:30 Call E-0708010603

Supervisor states that the system frozen

Resolution: Wed 01 August 2007 14:37

Call Close by Thomas Kane: screen freeze.. advised reboot.. ref given

Outcome

Screen freeze fixed by re-boot

85. Thu 23 August 2007 11:01 Call E-0708230383

Clerk reports her cp is printing blank receipts on node 1.

Resolution: Thu 23 August 2007 11:06

Call Close by Leanne Hudson: Pm states cp is printing blank, advised through checks. Pm states cp is printing ok, pm happy to continue and has ref.

Outcome

Printer problem.

Signature

Signature witnessed by

CS011A

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Witness Statement

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

Continuation of statement of Andy Dunks

86. Tue 28 August 2007 15:18 **Call E-0708280851**
 CC states CP is not printing receipts
Resolution: Tue 28 August 2007 15:23
 Call Close by Deepak Nerr: CP not printing receipts, advised to replace red ink cartridge, issue resolved. Ref Given.
Outcome
 Printer problem.

The following calls are in a different format due to the helpdesk software changing in October 2007.

87.
Incident: 10293 13/09/2007 09:29:18
Description: PM states he has an epson CP that is printing blank
 Fawthrop, Kyle 13/09/2007 09:35:50 Resolved
Desc: PM states he has an epson CP that is printing blank, cleaned the print heads and resolved the issue.

88.
Incident: 11370 14/09/2007 11:42:17
Description: PM stated green flashing. Error and Red Light. Slip light.
 Asghar, Rameez 14/09/2007 11:56:31 Resolved
Desc: PM stated that error red ink and tally roll were on. Advised reboot. REF GIVEN.

89. **Incident: 12252** 17/09/2007 09:31:03
Description: CP is not printing receipts
 Nerr, Deepak 17/09/2007 09:40:49 Close
Desc: CP not printing receipts, advised checks - issue resolved. Ref Given.

Signature

Signature witnessed by

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Witness Statement

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

Continuation of statement of Andy Dunks

90. Incident: 14215	18/09/2007 16:37:46	
Description:	bop printing blank.	
Majeed, Nazma	19/09/2007 17:18:11	Close
Desc:	Engineer Summary: refit print drum, all tested ok Call closure code 826	
91. Incident: 14468	19/09/2007 09:32:47	
Description:	PM states that his CP is not working	
Giles, Ricky	19/09/2007 09:38:09	Close
Desc:	PM states that his CP is not responding, advised to change black cart	
92. Incident: 41686	30/10/2007 10:04:46	
Description:	Counter clerk states that the cp is printing blank receipts	
Majeed, Nazma	30/10/2007 10:10:45	Close
Desc:	Advised self cleaning test x3 and this solved the problem. The cp is printing fine now	
93. Incident: 47888	08/11/2007 10:59:04	
Description:	PM states that she has had a power cut and she has gone into the lost pin screen	
Description:	PM states that she has had a power cut and she has gone into the lost pin screen	
94. Incident: 48100	08/11/2007 12:59:53	
Description:	FAD requires the Security keys updated - Contact the PM to request controlled restart and acceptance of new security data on all counters beginning with the Gateway counter. Ensure the network door	

Signature

Signature witnessed by

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Witness Statement

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

Continuation of statement of Andy Dunks

		is open for "Key Change" for the Gateway restart	
Agar, Charlene	09/11/2007 11:14:49		Close
Desc: key update complete			
95.	Incident: 48610	09/11/2007 09:39:11	
Description:		Pm states cp printing nothing at all	
Hickman, Nick	09/11/2007 09:52:11		Close
Desc: PM states cp not printing, when trying to print receipt, screen froze, advised reboot will call back later, ref given			
96.	Incident: 50596	12/11/2007 12:14:03	
Description:		PM states that she is having problems with her Moneygram	
Giles, Ricky	12/11/2007 12:15:35		Close
Desc: NBSC Issue			
97.	Incident: 56758	20/11/2007 11:22:26	
Description:		Clerk states on node 1 scanner is not scanning	
Seshadri, Kam	20/11/2007 11:27:04		Close
Desc: Pm had a problem with the bcr, advised pm to clean the lens found bcr seemed to be working fine			
98.	Incident: 56771	20/11/2007 11:28:39	
Description:		Pm states that her bcr is still not working ref from call 56758	
Thind, Sukhdeep	22/11/2007		Close

Signature

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Witness Statement

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

Continuation of statement of Andy Dunks

	09:35:47	
Desc: engineer replaced BCR.		
99.	Incident: 56802	20/11/2007 11:50:05
Description:	PM states that her base unit wont turn on	
Griffiths, Jamie	20/11/2007 11:56:23	Close
Desc: PM states that while i was checking events she got the base unit to turn on and has put in her PPMC card, gave a REF no. and told to call back if any more problems occur.		
100.	Incident: 59389	23/11/2007 12:43:23
Description:	Pin number - appears as mistyped	
Nerr, Deepak	23/11/2007 13:20:25	Close
Desc: Lost PIN, new PIN generated and accepted, POLO complete - starting services.		
101.	Incident: 59509	23/11/2007 14:30:00
Description:	pm states that they had to reboot node three and now the keyboard will not accept the pmmc card the keyboard does not recognise it	
Singh, Lucvinder	23/11/2007 14:37:51	Close
Desc: pm has logged on now and services are starting, pm happy to continue and will call back if she has any more problems, ref given		
102.	Incident: 63912	29/11/2007 13:11:19
Description:	CP is not printing.	
Law, Carla	01/12/2007 08:20:34	Close

Signature

Signature witnessed by

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Version 4.0 07/06

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Witness Statement

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

Continuation of statement of Andy Dunks

Desc: Engineer Summary: ink spill in printer exchanged printer test ok

103. Incident: 71603 07/12/2007 14:20:45

Description: PM states she has red light

Willis, Emma 07/12/2007 14:24:28 Close

Desc: PM states she has red light, Advised PM to change Black Ink cartridge, Issue Resolved

104. Incident: 72363 10/12/2007 09:01:22

Description: Pm states that her system is frozen on the message " Please wait while receipt is printing"

Asghar, Rameez 10/12/2007 09:05:55 Close

Desc: Pm states that her system is frozen on the message " Please wait while receipt is printing" Advised pm to reboot the counter and call back if the problem persists. Ref given

105. Incident: 79146 17/12/2007 10:44:49

Description: PM states CP on node 02 is not working

Brooks, Katrina 20/12/2007 09:44:14 Close

Desc: cleaned printer test ok INFO: CSR Code 000314 is known to D1 - AND updated ** PARTS USAGE VALIDATION INFORMATION ** INFO: No valid spares usage data found. INFO: No spares usage data was provided. ** END OF PARTS USAGE VALIDATION INFORMATION ** INFO: Cause Code completed is known to D1 - AND updated INFO: Repair Code 821 is known to D1 - AND updated OTI Auto Closing this call to CM.

Actual Visit:
Engineer: 000314
Arrival: 2007-12-18 14:40:00
Handed Back: 2007-12-18 15:00:00

106. Incident: 98279 14/01/2008 09:15:44

Description: OSP authorised by NSBC for Auditor - Keith Noverre.

Signature

Signature witnessed by

CS011A

Witness Statement

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

Continuation of statement of Andy Dunks

Thind, Sukhdeep 23/01/2008 16:09:09 Close
Desc: 0900 ... 15.01.08 po reopened.

108. Incident: 116574 04/02/2008 06:05:04

Description: Critical event received for node H12602300101 on the 02-04-08 @ 03:47:29. Classification = NT_Error, Source = Disk, NTID = 7. Event text reads, 'The device, \Device\Harddisk0\Partition1, has a bad block.'

Thind, Kaljinder 04/02/2008 09:44:35 Close
Desc: B Base Unit call raised - 116835

109. Incident: 116835 04/02/2008 09:37:05

Description: p/m states he has error message pwwdctr

Nerr, Deepak 04/02/2008 16:56:00 Close

Desc: Replaced b base unit.

110. Incident: 117569 04/02/2008 13:32:39

Description: PM wanted help with a transaction.

Fawthrop, Kyle 04/02/2008 13:36:21 Close

Desc: PM called in for transaction help, i have done checks and transferred to NBSC.

111. Incident: 117613 04/02/2008 13:53:46

Description: Can CLI be removed from this site to enable authentication

Signature

Signature witnessed by

CS011A

Witness Statement

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

Continuation of statement of Andy Dunks

Tidman, Erica 04/02/2008 17:29:06 Close

Desc: cli re-enabled

112. Incident: 132384 20/02/2008 09:32:28

Description: PM states he needs to do an AP reversal.

Fawthrop, Kyle 20/02/2008 09:35:42 Close

Desc: PM needed help with an AP reversal. transferred to NBSC.

113. Incident: 138233 26/02/2008 13:19:25

Description: itchica printier has an error 94

Leavesley, Carley 26/02/2008 13:28:42 Close

Desc: RMGA.H Hardware.HD07 Counter printer fault.CX6 Print Quality issue

114. Incident: 143395 03/03/2008 11:01:13

Description: PM states that his CP is printing white lines between the text.

millman, emma 03/03/2008 11:04:54 Close

Desc: PM states that his CP is printing white lines between the text. Advised to do 3 self clean tests, printing fine now. REF offered

115. Incident: 299321 05/06/2008 09:26:43

Description: CP is not printing due to red ink out light is on

Nerr, Deepak 05/06/2008 09:29:27 Close

Desc: Advised to replace the red ink cartridge.

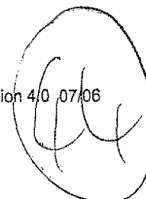
116. Incident: 388611 24/07/2008 15:06:27

Description: Manager states online services unavailable

Signature

Signature witnessed by

CS011A



Witness Statement

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

Continuation of statement of Andy Dunks

Seshadri, Kam 24/07/2008 15:09:08 Close
Desc: Pm had a problem with the online services, advised network test pinged, Advised pm that the online services are back up and running

117. Incident: 388735 24/07/2008 15:41:33
Description: pm states hes got the message Disconnected node

Poulton, Claire 24/07/2008 15:47:11 Close
Desc: checked events - nodes 2 and 3 are showing Disconnected
 advised pm to reboot both counters - gave incident

118. Incident: 391119 25/07/2008 16:31:20
Description: pm advises that he has no line online services and 1 counter: Disconnected.

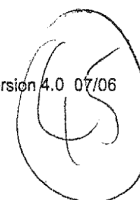
Sharma, Devan 25/07/2008 16:50:05 Close
Desc: Successfully Pinged.
 Counter has been connected.
 Advised pm to test a card transaction..
 pm advises that card transaction works.
 pm would like an engineer.
 Advised that i can send call to networks team but need to do a reboot.
 pm advises he is busy all the time.
 Advised when he is free if he can do a reboot.
 pm advises this has happened twice yesterday reference 388735 and 388611.
 pm would like to know which counter was disconnected.
 Health Check Node1-25%, Node2-0% and Node3-0%
 Advised pm Health Check Node1-25%, Node2-0% and Node3-0%
 Offered Reference.

119. Incident: 391460 26/07/2008 08:11:20
Description: *****VOICEMAIL CALL
 V260708001*****

Signature

Signature witnessed by

CS011A



Witness Statement

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

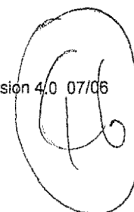
Continuation of statement of Andy Dunks

		NBSC ISSUE One Stock Unit is showing £1.000 loss unable to find where it has disappeared to.
Leavesley, Carley	26/07/2008 09:04:13	Close
Desc: Advised to call the NBSC		
120.	Incident: 393412	28/07/2008 11:42:11
Description:	When printing receipt it says "printer error" and the screen seems to be frozen	
Goad, Daniel	28/07/2008 12:41:50	Close
Desc: system now working fine after reboot to counter		
121.	Incident: 399282	30/07/2008 13:21:57
Description:	pm states that counter has froze on node 2	
Daly, Amanda	30/07/2008 13:27:51	Close
Desc: checked events all ok advised reboot ref given		
122.	Incident: 433532	15/08/2008 14:38:00
Description:	pm states no OLS	
Field, Sarah	15/08/2008	Close
Jane	14:49:44	
Desc: advised a reboot		
123.	Incident: 433735	15/08/2008 15:43:56
Description:	PM states that nodes 2 and 3 are disconnected	

Signature

Signature witnessed by

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Witness Statement

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

Continuation of statement of Andy Dunks

Sahota, Omkar	15/08/2008 16:03:57	Close
Desc: Advised reboot		
124. Incident: 433925	15/08/2008 16:52:30	
Description:	PM states following clal references 433735 and 433735, nodes 2 & 3 are still disconnected	
Sharma, Devan	18/08/2008 14:54:10	Close
Desc: Engineer Summary: Plugged in 8 port hub adaptor, tested ok		
125. Incident: 435728	18/08/2008 10:20:58	
Description:	PM need guidance on an AP reversal transaction	
Cooper, Jordan	18/08/2008 10:25:44	Close
Desc: Offered to transfer PM back to NBSC, however his office is too busy and he call them later		
126. Incident: 724071	09/12/2008 11:29:38	
Description:	Caller states CP is not printing labels.	
Sahota, Gagandeep	11/12/2008 11:41:00	Close
Desc: Engineer Summary: changed as no print changed tested working all ok		
127. Incident: 728050	10/12/2008 12:23:45	
Description:	pm has message onscreen. you are losing until the branch is rolled into the next tp. stock unit bb rolled into the current tp 42 days ago.	

Signature

Signature witnessed by

Witness Statement

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

Continuation of statement of Andy Dunks

	of new security data for nodes	
Leavesley, Carley	21/09/2009 13:44:57	Close
Desc: RMGA.S Software.SD17 Key refresh.CG9 Scheduled security data update		
132.	Incident: 1621289	06/10/2009 13:07:58
Description:	OLS are down	
Briggs , Lisa	09/10/2009 11:56:03	Close
Desc: ADSL card replaced by engr. Comms ok since. PM happy to close call.		
133.	Incident: 1621846	06/10/2009 14:33:54
Description:	OSP for PM Lisa Hothersall	
Spang, Perry	06/10/2009 15:07:39	Close
Desc: Called Post office... they said that they haven't requested a OSP at all today		
134.	Incident: 1622327	06/10/2009 15:45:43
Description:	PM said that her online services is running fine but says that it goes down every now and again	
Spang, Perry	06/10/2009 15:48:51	Close
Desc: PM said that her online services is running fine but says that it goes down every now and again		
Advised PM to call back when it next happens		
135.	Incident: 1658567	17/10/2009 09:29:25
Description:	Caller states that she has message saying "this counter has disconnected from the network"	

Signature

Signature witnessed by

CS011A

Witness Statement

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

Continuation of statement of Andy Dunks

Badenhorst, Jean	17/10/2009	Close
Paul	10:26:13	
Desc: Advised pm to reboot.		

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Signature witnessed by

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Witness Statement

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

Statement of GARETH IDRIS JENKINS

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 8 day of February 2010

Signature

I have been employed by Fujitsu Services, working on the Post Office Account, formally ICL Pathway Ltd, since 1996 as a Customer Solutions architect, involved in many aspects of design and implementation of the computer system known as Horizon. This is a computerised accounting system used by Post Office Ltd.

I have been asked if issues found at Callender Square Post Office in Falkirk could have caused the discrepancies in the case of SEEMA MISRA. At this stage, I am not aware of the details of the problems in Callender Square Post Office in Falkirk. However I expect to be able to find out the details of that case and also to compare the failing scenarios with the detailed logs that are to be extracted for the SEEMA MISRA case and should then be able to make it clear if the scenario is relevant.

I have been asked to make comments on the **3rd Interim Technical expert's report to the Court prepared by Charles Alastair McLachlan, a Director of Amsphere Consulting Ltd.**

I have listed below the statement contained within the above mentioned report in *italics* and recorded my comment beneath in **bold**. For ease I have retained the original number reference.

1.2.1 Source of problem – End to end EPOSS transaction flow: the equipment failure user guide provided identifies at subsection 14 a process for identifying lost EPOSS

Signature

Signature witnessed by

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Witness Statement

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

Continuation of statement of GARETH IDRIS JENKINS

transactions. The implication is that EPOSS transactions can be lost due to equipment failures. Without access to the sub post office data records and the intermediate data records in the end to end process it will not be possible to identify the extent to which this may explain the accounting discrepancies.

No request has been made to Fujitsu for any data relating to this branch. The logs would show any equipment failures and replacement which might possibly relate to lost transactions.

1.2.2 Source of problem – Poor integration: the helpdesk reports provided in Andy Dunks 2nd statement identify a series of problems with the network, printer and the pin terminal. It has not been possible to test whether this could give rise to inconsistent data capture and transmission at the sub post office.

Not sure what this is about. What exactly is required?

1.2.3 Source of problem – systems issues causing incomplete/inconsistent processing of transactions between sub post office and central systems: the reports provided in Andy Dunks 2nd statement identify a number of cases in which the user was required to 're-boot' the terminal. It has not been possible to test whether this could give rise to inconsistent data records in the sub post office.

Again without examining the logs it isn't possible to progress this.

1.3 Hypothesis: Errors in operator data entry are not properly reconciled by the Post Office finance function or by the Horizon system: without access to the system files it is not possible to determine whether this is the case.

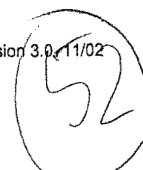
Again what is being requested? I've not seen any logs and I don't believe that they have been requested so how can this be progressed without them?

1.3.1 Source of problem – lack of reconciliation of EPOSS transactions end to end:

Signature

Signature witnessed by

CS011A



Witness Statement

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

Continuation of statement of GARETH IDRIS JENKINS

without access to the system data files it is not possible to determine whether this is the case.

What is being requested?

1.3.2 Source of problem – lack of reconciliation of other transactions end to end:
without access to the system data files it is not possible to determine whether this is the case.

Agreed, so the Logs need to be retrieved and examined.

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.

Signature

Signature witnessed by

CS011A

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Witness Statement

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

Statement of GARETH IDRIS JENKINS

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

This statement (consisting of 14 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 2 day of February 2010

Signature

I have been employed by Fujitsu Services, working on the Post Office Account, formally ICL Pathway Ltd, since 1996 as a Customer Solutions architect, involved in many aspects of design and implementation of the computer system known as Horizon. This is a computerised accounting system used by Post Office Ltd.

I have been asked to make comments on the **2nd Interim Technical expert's report to the Court prepared by Charles Alastair McLachlan, a Director of Amsphere Consulting Ltd.**

I have listed below the statement contained within the above mentioned report in *italics* and recorded my comment beneath **in bold**. For ease I have retained the original number reference.

2.1.3.3

There are consistently discrepancies arising from the use of debit cards or post office cash account cards.

Not sure I understand what is meant by a "discrepancy" in this context. My understanding is a discrepancy is where the system derived value for an item differs

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Witness Statement

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

Continuation of statement of GARETH IDRIS JENKINS

from that physically in the Stock unit and so this only applies to Cash or Stock. The Value of Debit (and Credit) Cards and POCA Cards is handled as a "Payment" and should balance with the corresponding "Receipt" recorded for the goods or Service that they are used for.

2.1.3.5

If an "Account Payable" or counter credit is entered the Horizon system assumes that there is a corresponding receipt (either physical cash, debit card transaction, Post Office Cash Account card transaction or cleared cheque).

True, and this is checked during the Settlement process. Note also that unlike a normal retail environment there may be "outpay" items (eg a cashed giro) that need to be taken into account. However the basic principle of the sum total of all transactions within a Customer session adding up to zero is maintained.

2.1.3.6

The post mistress used to receive discrepancy reports generated by the Post Office identifying when there was a mismatch between the counter credit recorded at the counter and the cleared cheque or debit card amounts reported to them by their correspondent banks or card merchant provider. She no longer receives these and concludes that the Post Office function that provided this service is non-operational or insufficiently staffed to properly reconcile all of the discrepancies. These discrepancies, if left unresolved, could create a liability for the sub postmistress.

This question is for Post Office Ltd to answer. I am aware of a function known as Transaction Corrections which is available for Post Office Ltd central functions to resolve any issues that are found.

2.1.3.7

If stock is sold, the Horizon system assumes that there is a corresponding receipt (either physical cash, debit card transaction, Post Office Cash Account card transaction).

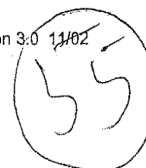
And it requests the User to specify how it is settled for and accounts for it accordingly.

2.1.3.8

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Witness Statement

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

Continuation of statement of GARETH IDRIS JENKINS

If at the end of the monthly period there is a discrepancy between the cash on hand and the credit balance expected by the Horizon system then the only way to close the period and start a new period is to "make good" the cash discrepancy and declare that the cash on hand has been brought up to the expected credit balance. There is no mechanism to record the discrepancy in a suspense account for subsequent investigation and resolution. The system imposes a declaration as part of the operating procedure that the cash is on hand. If the actual reason for the discrepancy is due to a problem with a non-cash credit (e.g. incorrectly processed card payment, incorrectly recorded cheque payment) then there is no opportunity for the sub post mistress to note her concerns on the system.

This was the requirement made by Post Office Ltd of the system. Therefore Post Office Ltd need to address this comment.

2.1.3.9

The sub post mistress demonstrated the following transactions in which the use of a debit card could result in a discrepancy in the cash account (physical + debit card/POCA amounts) at the sub post office:

Cash and Plastic (ie Credit / Debit Cards) and Banking (eg POCA) are handled separately in the accounts.

2.1.3.10

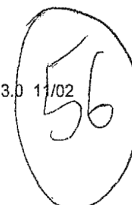
Account Payable using a Debit Card / POCA card: the customer is seeking to make a bill payment of council tax using a debit card. The card is apparently authorised at the PIN terminal for the required amount. The card receipt is apparently credited to the sub post office account. The council tax payment is debited from the sub post office account. However, during the end to end electronic fund transfer process the fund transfer fails. The central Post Office account never receives the expected electronic funds. It is supposed that the end of day process identifies that there is no credit corresponding to the bill payment and therefore there must be a cash discrepancy.

This observation needs to be explained more carefully. What exactly was observed to happen here? The back end settlement between the Merchant Acquirer (MA) and Post

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Witness Statement

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

Continuation of statement of GARETH IDRIS JENKINS

Office Ltd is totally separate from the accounting done in the Local Branch. Provided the Debit Card transaction is Authorised by the MA, then the Branch Accounts will record the Debit Card payment as the Method of Payment (MoP). However if the MA doesn't authorise the transaction then an alternative MoP is required. What action is taken should the MA fail to honour the authorised payment and whether that results in a Transaction Correction (TC) being sent to the branch to reclaim the funds is a separate issue outside my knowledge, but Post Office Ltd should be able to clarify that. Note that such rejections are rare. It is the responsibility of the clerk to ensure that the Debit Card payment was successfully authorised by the MA and to check the response received. Should they not do so and assume it was processed and touch "Fast Cash" to clear the basket without looking at the screen, then indeed the system might record a Cash transaction.

In summary, if the Debit Card payment says that it works at the time, then it is recorded as such in the branch accounts. There is no automatic feedback into the branch accounts from any subsequent MA rejections.

2.1.3.11

Debit Card/POCA withdrawal: the customer is seeking to receive an over the counter payment of cash from their debit card or POCA facility. As above [2.1.3.10] the card is apparently authorised but in fact the fund transfer fails at some point and the sub post office account is debited with the cash at the counter terminal but this is not recorded centrally against a debit card fund transfer. There is therefore an apparent cash shortfall in the till. The Horizon system only prints a receipt for the customer; there is no debit voucher for the counter staff to place in their till. At the end of the day or the end of the week it is not possible to physically reconcile the cash payments with debit vouchers.

There are clear messages to the clerk indicating whether or not any Banking or Debit Card transactions was authorised. As above there is no subsequent automatic correction due to any subsequent failures. I accept that there is no Branch Receipt produced for paper reconciliation purposes. We were specifically requested not to produce one by Post Office Ltd.

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Witness Statement

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

Continuation of statement of GARETH IDRIS JENKINS

2.1.3.12

In either of the two cases above [2.1.3.10], [2.1.3.11] the electronic funds transfer mechanism duplicates the fund transfer. This could result in the expected credit balance at the sub post office being higher than it actually is. The sub post mistress will be expected to make good this discrepancy with cash.

Sorry, but I don't understand the point being made.

2.1.4.3

She also demonstrated the weaknesses of the system in relation to the use of the debit card/POCA terminal:

- *the lack of counter vouchers,*

This was a specific Post Office Ltd request

- *the requirement to record some debit terminal transactions as cash receipts,*

This may need to be explored further. I'm not aware of any such requirement other than in the area of Refunds.

- *the delays in the system at busy periods,*

Again I'm not sure what the relevance of this is. My understanding is that the response time for online transactions is very good

- *the lack of certainty as to whether a transaction completes when there is a break in network connectivity*

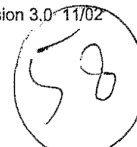
There should be clear messages in all cases as to whether the clerk should assume the transaction was successful or not. In the case of a comms failure the assumptions should always be that the transaction has failed. Recovery processes will allow this to be confirmed afterwards.

2.1.5.3

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Witness Statement

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

Continuation of statement of GARETH IDRIS JENKINS

All of the facilities of Horizon are available in off-line mode except debit/POCA transactions and access to information from the DVLC required to issue vehicle licences.

There are other exceptions now.

2.1.5.4

The Horizon system sells postal services, provides foreign exchange, supports receipts of cash, cheque and debit card/POCA for Accounts Payable services and supports payment of cash from debit card/POCA accounts.

Also other banking online services for A&L and via Link

2.2.1.2

It was clear that there is no standard operating procedure to reconcile counter credits with the actual amounts recorded. This could give rise to a range of discrepancies which the sub post mistress would rely on the Post Office to identify and reconcile. If the Post Office failed to do so then overstated amounts could give rise to a deficit at the sub post office which the sub post mistress would be required to make good with cash.

Again I'm not sure what is meant here. Post Office Ltd should comment on their processes.

2.2.2.1

The West Byfleet sub post office is set up to operate with each counter having a separate stock. Although this assists with stock control and ensures that stock discrepancies can be localised, it does not provide any assistance in management of discrepancies in debit/POCA receipts (no vouchers are automatically printed) or Accounts Payable and counter credit discrepancies (standard operating procedures do not reconcile these on a daily basis).

Again for Post Office Ltd to respond.

2.2.3.3.

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Witness Statement

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

Continuation of statement of GARETH IDRIS JENKINS

He agreed that the Horizon system provided no paper record of debit/POCA vouchers and therefore that a sub postmaster/mistress would not be able to produce any evidence that a customer had received a receipt for a debit/POCA transaction.

This information is available in the Audit data which could be supplied as evidence

2.2.3.4

He accepted that the Horizon system, as supplied, which the sub post master/mistress was required to use under contract, did not provide the facility for the sub post master/mistress to reconcile discrepancies that might arise in the operation of the system.

This is down to Post Office Ltd requirements.

3.1.1

Accounting systems are usually designed around a 'double entry' booking keeping principle. The double entry book keeping principle means that for every entry into the system there is an equal and opposite entry that should maintain the 'balance' between the accounts.

Horizon follows this principle.

3.1.2.

So, for example, if somebody at the till sells a stamp for £1 paid in cash then the stock account would be reduced by £1 value of stock and the cash on hand account would be increased by £1 – overall the balance between the accounts would be unchanged.

Horizon does this.

3.1.3

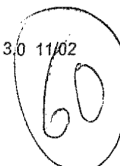
As part of the process of financial control, it would be normal for the value of stamps to be physically counted and recorded (stock value) and the value of cash on hand physically counted and recorded (cash value) and these two values compared ('reconciled') to what is recorded in the accounting system.

This is required as part of the Stock Unit Balancing process which should happen at least once per month and can be done as often as required. In particular Cash should be

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Witness Statement

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

Continuation of statement of GARETH IDRIS JENKINS

Declared (and variances checked) daily.

3.2.1

The User Interface gives rise to incorrect data entry: poor user experience design and inadequately user experience testing can give rise to poor data entry quality. In cases that users are working under pressure, insufficiently trained or are using a system presented in a language different from their first language the problems of data entry can be exacerbated.

I'm not sure what is meant by "The User Interface gives rise to incorrect data entry".

Training matters are down to Post Office Ltd.

3.2.2

The Horizon system fails to properly process transactions: accounting systems are usually carefully designed to ensure that accounts balance after each "double entry" transaction. In particular, a database technology referred to as 'two-phase' commit is used to ensure that either both entries or neither entry is recorded on the system.

Horizon does properly process transactions and does ensure that double entries are always both committed atomically. There is no need for a 2 phase commit as such in the branch accounts, but the design of the interfaces to both the MA and POCA ensure that the view of the transaction as recorded in the Branch is the "correct" view and other systems are adjusted (if necessary) to match this view through various reconciliation processes.

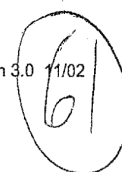
3.3.1

There are opportunities for incorrect data entry (e.g. entry of £2,000 for a cash credit rather than £200) to give rise to discrepancies in cash recorded on Horizon versus cash held at the till. The sub post office relies on the consistent, accurate and timely resolution of these discrepancies by the Post Office and the operators of the Horizon system. The sub post master/mistress has no standard operating procedure or local record that protects them from the failure of the Post Office or the operators of the Horizon system to deal with the

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Witness Statement

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

Continuation of statement of GARETH IDRIS JENKINS

discrepancies. Perversely, the Post Office and the operators of the Horizon system have no incentive to resolve discrepancies that appear as cash losses at the post office counter because the sub post office contract makes the sub post master/mistress personally liable.

I agree that the system just records what the user enters, but there is little that can be done to resolve that. However when cash is deposited messages are displayed requiring the Clerk to check the amount deposited which should minimise such errors.

3.3.2

The Horizon system does not appear to be a single monolithic mainframe based system with computer terminals with no independent processing capability. Rather the architecture relies on a number of inter dependent units: the individuals nodes (counter terminals) at the sub post office each with its own processing unit with an attached keyboard, touch screen, barcode scanner, debit card authorisation PIN terminal and printer and a network router to the wider Horizon system. Each of these components could give rise to faults that result in discrepancies: either due to problems within the components or due to problems from interaction between the components.

I accept that currently Horizon does depend on data recorded and held on the local system which is then replicated to other counters and the central system. However I am unclear why this is considered to be a fault.

3.3.3

Within the central Horizon system that is not directly visible to the counter operators I would expect there to be a set of inter-operating components that could give rise to malfunctions and discrepancies. In particular, the end to end dialogue between the counter terminal, the card authorisation terminal, the network, the core Horizon system, the electronic funds transfer component, the authorising merchant service and the central post office branch accounting system is a long running transaction with multiple points of possible failure.

Agreed that this is complex. However the key point is that the end result as seen at the counter is what is displayed to the clerk and what goes into the accounts. Any hypothetical corruption (and I'm not aware of any issues in that way) in other systems

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Witness Statement

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

Continuation of statement of GARETH IDRIS JENKINS

should not result in any discrepancies at the Branch. In particular should no response be received, then the clerk will be advised of this and that it must be assumed that the transaction failed.

3.3.4

Complex systems of this nature rarely have sufficient capability built in to deal with all possible failure points and discrepancies are very likely to arise which require manual intervention based on the reconciliation of paper and electronic logs at different points in the system. When the end to end system does not provide the counter staff with access to paper or electronic logs at the point of use then it is impossible for them to identify whether there is a system fault or operator problem.

There are full logs, but I agree that they are not all made directly available to the end user. I suspect that this is true in any complex system. There are mechanisms by which details of individual transactions can be printed off from the system if there is some uncertainty via the "Transaction Log" Reports.

4.1.1

The first problem with the provision of evidence is that the Horizon system does not automatically provide a paper voucher for retention at the post office counter when funds are withdrawn using a debit card or Post Office Cash Account card. Therefore the sub post office has no mechanism for reconciling the result of downstream processing by the Horizon system and the Post Office with what occurred at the sub post office counter either at the time or when discrepancies are identified at the end of the weekly trading period. In effect, the Horizon system makes it impossible for the sub post office to demonstrate an error occurred in the downstream processing.

This is for Post Office Ltd comment.

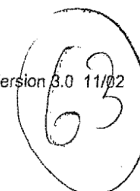
4.1.2

The second problem with the provision of evidence is that the Horizon system does not automatically provide a paper voucher for retention at the post office counter when funds are

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Witness Statement

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

Continuation of statement of GARETH IDRIS JENKINS

credited to the sub post office account as part of a bill payment (Accounts Payable) as a result of a withdrawal using a debit card or Post Office Cash Account card. Therefore the sub post office has no mechanism for reconciling the result of downstream processing by the Horizon system and the Post Office with what occurred at the sub post office counter either at the time or when discrepancies are identified at the end of the weekly trading period. In effect, the Horizon system makes it impossible for the sub post office to demonstrate an error occurred in the downstream processing.

Again this is for Post Office Ltd comment.

4.1.3

The third problem with the provision of evidence is that the standard operating procedure for post office counter clerks does not include the reconciliation of bill payment or counter credit slips with the individual amounts recorded by the counter clerk onto Horizon. In effect, this standard operation procedure makes it impossible for the sub post office to identify any failures by the Post Office or the Horizon system in identifying or dealing with discrepancies arising from incorrect data entry.

Again for Post Office Ltd comment.

4.2.1

There are two elements to this possible cause

- The sub post office staff and, in particular, the sub post master/mistress is not trained in the proper operating procedures to deal with maintaining an auditable contemporaneous record that would protect their reputations in the event that faults in the Horizon system or operator error resulted in discrepancies between the actual cash position and the centrally recorded cash position.*

Horizon does maintain a full audit of what is recorded which can be made available to Post Office Ltd. I am also aware of at least one case where this information has been made available directly to a Defence Accountant.

- The sub post office staff are not properly trained in the use of the Horizon system.*

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Witness Statement

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

Continuation of statement of GARETH IDRIS JENKINS

This is for Post Office Ltd comment.

4.2.2

In order to understand to what extent sub post office staff are trained in the necessary operating procedures, it would be necessary to review the course material provided for counter staff and sub post masters/mistresses and to review the training and assessment processes implemented by the Post Office. Finally, it would be necessary to review to what extent the necessary operating procedures could feasibly be adopted and were in fact adopted in general operating practice and in the case of Seema Misra in particular.

For Post Office Ltd to respond.

4.2.3

In order to identify whether Horizon system training is a possible cause, it would be necessary in the first instance to sit alongside a user operating in normal Post Office conditions that had only recently completed the standard systems training and who represented the kind of user engaged by the Defendant.

For Post Office Ltd to respond.

4.2.4

If there is a pattern of incorrect data entry then it would be necessary to conduct a detailed examination of the kinds of incorrect data entry that occur and the implications for failure of accounting.

I'm not sure exactly what is meant here. I'm aware of work within Post Office Ltd to explore errors in data entry and to come up with ways to reduce them.

4.2.5

There are two available technologies that could assist in examining cases of incorrect data entry:

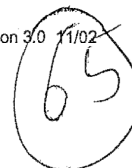
- *Screen capture technology installed on the user terminal that keeps a record of every key press/screen press and the associated screen shot.*

This is not practical. However the Audit trail that Horizon maintains does provide a

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Witness Statement

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

Continuation of statement of GARETH IDRIS JENKINS

fairly comprehensive record of what has happened.

- *Digital camera recording equipment positioned to have a clear view of the screen continuously recording the screen as it responds to operator entry*

This is clearly possible. A similar technique has also been used to benchmark system response times.

4.3.2

Further, if there is prima facie evidence of incorrect transaction processing, it would be necessary to review the technical documentation of the Horizon system and interview key individuals responsible for the system within the Fujitsu team in order to understand the potential source of the incorrect transaction processing. From my understanding of comparable retail systems architectures there are a large number of potential points of failure which could give rise to the kind of discrepancies reported by Seema Misra and the sub post mistress in the Midlands. In particular, I have reviewed the architecture for a national retailer and identified a series of possible failure points which are currently addressed by testing, review of error logs and reconciliation of discrepancy reports. See Exhibit "Point of Sale – Electronic Funds Transfer architecture".

I don't see the relevance of this diagram. It is nothing like what Horizon does. We could if necessary provide some documentation and information on Horizon. However I am confident that there is not a system problem and the issues are due to incorrect actions (whether deliberately or accidentally) by the user.

4.3.3

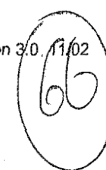
Based on the review of the technical documentation, it should be possible to identify and examine the various electronic log files maintained by different components of the systems architecture that are required by the Electronic Mastercard Visa (EMV) standard or for Payment Card Industry (PCI) compliance.

These are probably available. (I'm not sure how long they are held and they will probably have had details of Cards Obfuscated for Security reasons as required by PCI.)

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Witness Statement

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

Continuation of statement of GARETH IDRIS JENKINS

4.3.4

If the potential source of the incorrect transaction processing can be identified then it would be helpful to be able to reproduce the problems under controlled test conditions in a consistent and reproducible manner. This would require the assistance of Fujitsu in providing access to the test environments maintained in support of the Horizon system.

Again this is technically possible.

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.

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Version 3.0 11/02
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Royal Mail Group

Witness Statement

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

Statement of	Andrew Bayfield	
Age if under 18	Over 18	(If over 18 insert 'over 18')

This statement (consisting of nine (9) 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 3rd day of February 2010
the

Signature

I am employed as a Network Support Manager for Post Office® Ltd and have been so employed since December 1978 and since June 2007 in this specific role.. (My role as Network Support Manager is to manage the training and audit team for Post Office Ltd, this team consists of over 150 people who deliver induction training and on site support to new staff and subpostmasters, from the foundation course in classroom to more specialist sales and product training, my team also deliver all on site support to new subpostmasters this is 6 days of on site support when first taking ownership of the post office branch and also includes a detailed transfer of branch accounts and a follow up support office balance on the Wednesday following the completion of the sixth day of on site support. I have been involved with the use and training of the horizon system since it was first used in Post Office Ltd this is now over 11 years of use. I regularly work in a live counter environment to ensure I maintain my operating skills and I regularly visit my team when either in

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Signature witnessed by

Witness Statement

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

Continuation of statement of Andrew Bayfield

classroom or on site to ensure that I see how they operate. I have been a senior manager within frontline Post Office operational teams since 1993 and have a lot of experience of branch operations in all types of Post offices.

I have been asked by Jon Longman a Post Office® Security Advisor, to examine the 2nd Interim Technical expert's report to the Court prepared by Charles Alastair McLachlan and where applicable reply to any points raised.

The following responses that I have given are based purely on the knowledge that I have gained of the Horizon system through the various roles I have performed.

I will list the points raised from Mr McLachlan in italics and then show my responses to each question immediately below.

Q 2.1.3.6 - The post mistress used to receive discrepancy reports generated by the Post Office identifying when there was a mismatch between the counter credit recorded at the counter and the cleared cheque or debit card amounts reported to them by their correspondent banks or card merchant provider. She no longer receives these and concludes that the Post Office function that provided this service is non-operational or insufficiently staffed to properly reconcile all of the discrepancies. These discrepancies, if left unresolved, could create a liability for the sub postmistress.

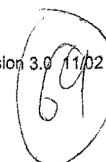
A 2.1.3.6 - Where declared transactions by the branch disagree with data provided by the client then evidence is provided to support the issuing of a transaction correction, this

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Version 3.0 11/02



Witness Statement

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

Continuation of statement of Andrew Bayfield

information and evidence is sent to the branch for "corrective action and bringing to account". The subpostmaster has the right to challenge any Transaction Correction(TC) but they need to provide counter evidence to support their challenge. If this evidence is not provided then the TC must be brought to account. I cannot offer any explanation for why the branch is seeing fewer of these other than they are correctly transacting all counter transactions.

Q 2.2.1.2 - It was clear that there is no standard operating procedure to reconcile counter credits with the actual amounts recorded. This could give rise to a range of discrepancies which the sub post mistress would rely on the Post Office to identify and reconcile. If the Post Office failed to do so then overstated amounts could give rise to a deficit at the sub post office which the sub post mistress would be required to make good with cash.

A 2.2.1.2 - There is a standard operating process and the Branch Trading Statement produced will provide a branch balance if all transactions have been processed correctly at the counter. The subpostmaster is trained to and should produce daily/weekly reports to ensure that the office balances the accounts correctly. If followed and routine checks are done by the subpostmaster then the branch will balance its account and no corrections will be issued.

Q 2.2.2.1 - The West Byfleet sub post office is set up to operate with each counter having a separate stock. Although this assists with stock control and ensures that stock discrepancies can be localised, it does not provide any assistance in management of discrepancies in debit/POCA receipts (no vouchers are automatically printed) or Accounts

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Signature witnessed by

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Witness Statement

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

Continuation of statement of Andrew Bayfield

Payable and counter credit discrepancies (standard operating procedures do not reconcile these on a daily basis).

A 2.2.2.1 - Any Post Office branch that is set up with individual stock units can clearly identify where errors were produced and thus who is accountable for them. Transaction reports are available on all transactions per stock unit, these reports can be produced by time period, by product or transaction, this linked to correct use of Horizon ID Log ons and passwords enable the subpostmaster to prove who did what, where, and when. Thus ensuring accountability for the person logged on to that particular stock unit.

Q 2.2.3.3. - *He agreed that the Horizon system provided no paper record of debit/POCA vouchers and therefore that a sub postmaster/mistress would not be able to produce any evidence that a customer had received a receipt for a debit/POCA transaction.*

A 2.2.3.3. - A paper receipt is not produced for a debit/POCA transaction for retention by the Post Office® at the time of the transaction. However, a transaction log can be printed at any time if so required by the subpostmistress to show the payment details of any debit/POCA transactions.

Q 3.2.1 - *The User Interface gives rise to incorrect data entry: poor user experience design and inadequately user experience testing can give rise to poor data entry quality. In cases that users are working under pressure, insufficiently trained or are using a system presented in a language different from their first language the problems of data entry can be exacerbated.*

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

Continuation of statement of Andrew Bayfield

A 3.2.1- Entering the right information either by scanning, bar coding or via manual entry is no more prone to incorrect entry than any other system. The screen prompts the clerk what to do and show whether there is a requirement to take payment from the customer or to give payment to the customer. The responsibility for recruitment and training of subpostmaster staff is clearly identified within their contract, so any issues above are for the subpostmaster to have resolved.

Q 4.1.1 - The first problem with the provision of evidence is that the Horizon system does not automatically provide a paper voucher for retention at the post office counter when funds are withdrawn using a debit card or Post Office Cash Account card. Therefore the sub post office has no mechanism for reconciling the result of downstream processing by the Horizon system and the Post Office with what occurred at the sub post office counter either at the time or when discrepancies are identified at the end of the weekly trading period. In effect, the Horizon system makes it impossible for the sub post office to demonstrate an error occurred in the downstream processing.

A 4.1.1 - Transaction logs are available for all transactions undertaken as stated earlier. Comparisons can then be examined should a transaction correction be forwarded to the branch for reconciling.

Q 4.1.2 - The second problem with the provision of evidence is that the Horizon system does not automatically provide a paper voucher for retention at the post office counter when funds are credited to the sub post office account as part of a bill payment (Accounts

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

Continuation of statement of Andrew Bayfield

Payable) as a result of a withdrawal using a debit card or Post Office Cash Account card. Therefore the sub post office has no mechanism for reconciling the result of downstream processing by the Horizon system and the Post Office with what occurred at the sub post office counter either at the time or when discrepancies are identified at the end of the weekly trading period. In effect, the Horizon system makes it impossible for the sub post office to demonstrate an error occurred in the downstream processing.

A 4.1.2 - Why would a piece of paper be evidence that down stream processing has occurred correctly, a piece of paper produced would only show what was on the screen, the clerk sees this and the customer gets a receipt for their transaction. If as is being suggested that a problem occurs in the down stream processing, then a piece of paper adds no value to this in terms of identifying an issue.

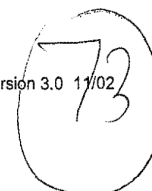
Q 4.1.3 - The third problem with the provision of evidence is that the standard operating procedure for post office counter clerks does not include the reconciliation of bill payment or counter credit slips with the individual amounts recorded by the counter clerk onto Horizon. In effect, this standard operation procedure makes it impossible for the sub post office to identify any failures by the Post Office or the Horizon system in identifying or dealing with discrepancies arising from incorrect data entry.

A 4.1.3 -On these types of transaction a customer tells the clerk what they want, the clerk transacts either via a swipe card or bar code scanning. The amount due for tender is requested and the customer gets a receipt for what they have transacted and the branch

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

Continuation of statement of Andrew Bayfield

has this transaction on its transaction log. Should errors have occurred the customer receipt and the branch transaction log can prove what was done, at what time and by whom.

Q 4.2.1 - The sub post office staff are not properly trained in the use of the Horizon system.

A 4.2.1 - We train the subpostmaster, it is their responsibility (contractually indicated to them when appointed) to train their staff in the correct use of the horizon system.

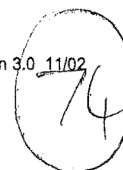
Q 4.2.2 - In order to understand to what extent sub post office staff are trained in the necessary operating procedures, it would be necessary to review the course material provided for counter staff and sub post masters/mistresses and to review the training and assessment processes implemented by the Post Office. Finally, it would be necessary to review to what extent the necessary operating procedures could feasibly be adopted and were in fact adopted in general operating practice and in the case of Seema Misra in particular.

A 4.2.2 - We have a standard training course that covers the basics of Post Office branch operations, we also provide on site support when first in post. We have a definitive operations manual in all branches. We have a helpline that subpostmasters can call. We have in many branches (West Byfleet included) a Business Development Manager (area manager in simple terms) who is regularly in branch helping and coaching the whole team in operations and sales procedures, all of this is designed to ensure understanding and

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Witness Statement

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

Continuation of statement of Andrew Bayfield

competency.

We regularly review course content and suitability, our trainers are regularly assessed by their line manager on their competency to deliver training.

Q 4.2.3 - In order to identify whether Horizon system training is a possible cause, it would be necessary in the first instance to sit alongside a user operating in normal Post Office conditions that had only recently completed the standard systems training and who represented the kind of user engaged by the Defendant.

A 4.2.3 - We do not train assistants, we train the subpostmaster who is then responsible for the ongoing training of their staff, this is a spurious request and one that would add no value as again we train subpostmasters who are contractually responsible for Post Office assets and are well aware of this.

Q 4.2.4 - If there is a pattern of incorrect data entry then it would be necessary to conduct a detailed examination of the kinds of incorrect data entry that occur and the implications for failure of accounting.

A 4.2.4 - Not at all sure how ones recognises patterns of incorrect data entry. As stated at the beginning, any transaction correction issue to a Post Office has evidence with it to support the claim, the subpostmaster can challenge this but must refute the evidence for the challenge to stand.

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Witness Statement

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

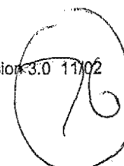
Continuation of statement of Andrew Bayfield

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

Statement of	Jon Longman	
Age if under 18	Over 18	(If over 18 insert 'over 18')

This statement (consisting of 2 (two) 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 5th day of February 2010
the

Signature

Following my statement of 6th January 2009, I would now like to add the following.

I have been a Post Office® Investigator for almost 10 years, having joined the department in June 2000.

Over the years I have developed a working knowledge of Horizon and have successfully undertaken a variety of casework involving different fraud transactions. However, my knowledge of the Horizon system is not up to the level of a counter clerk or subpostmaster who uses the system on an almost daily basis. I also have no IT knowledge as to the workings of the Horizon equipment or data transfer.

I have used the Horizon system when requested, to work at main Post Offices during strike periods and at Christmas to assist with the seasonal increase in customers. I have had minimal training on the use of Horizon but have always been able to conduct most customer transactions and balance the stock that I have been using. I have never experienced any

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Witness Statement

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

Continuation of statement of Jon LONGMAN

problems with the Horizon system other than pressing the wrong icon on the screen and requiring assistance from a more experienced clerk to get me back to the correct screen.

As an Investigator I have been tasked with investigating cases such as, Audit Shortages, Pension & Allowance Fraud, Driving Licence Application Fraud, Postage Fraud, Green Giro Fraud, Post Office® Card Account Fraud, Banking Fraud, Bureau Fraud e.g. Due to the wide variety of cases that we investigate it is not always possible to remember how the transaction is carried out on Horizon and therefore, I would seek advice from any number of sources within Post Office® Ltd such as colleagues, Branch Managers, Auditors, Contract Managers, Operations Manuals e.t.c. to fully understand the fraud and how it is being carried out. Liaison with external agencies such as Alliance & Leicester, DVLA and First Rate e.t.c is also made to assist with enquiries where necessary.

When conducting enquiries at a Post Office®, if any interview with a member of staff reveals a system problem as a possible cause for the loss then this would be followed up as a matter of course by making the necessary enquiries with our Financial Department at Chesterfield in the first instance. If during interview no mention is made of system failures and other reasons are given for cause of the losses such as staff thefts then I would not as an Investigator make system enquiries.

I am now in possession of the personnel file for Mrs Misra. Apart from the training records that have already been copied and forwarded to Post Office® Legal Services, the remainder of the file contains information relating to Mrs Misra's application to become a subpostmaster, transfer details, conditions of appointment, assessment process summary sheet, agency business plan, Seema Misra CV, provisional contract between Mahesh Kumar Patel and S & D Misra and the Reason to Urge notes of an interview held between Mrs Misra and Elaine Ridge, Contracts Manager on the 12th March 2008.

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GUILDFORD CROWN COURT

THE QUEEN

v

SEEMA MISRA

NOTICE OF ADDITIONAL EVIDENCE

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