Audit Trail Functional Specification

Version: 3.1

Date: 10/11/99

Document Title: Audit Trail Functional Specification

Document Type: Functional requirements specification

Abstract: This document provides a specification of the Audit Trail in

accordance with R699.

Distribution: Pathway Requirements

Pathway Audit Pathway Design Horizon Library Pathway Library

Document Status: Issued

Document Predecessor: Version 3.0

Associated Documents: See below

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Signature/Date: 10/11/99

Comments To: Author, Jan Holmes

Comments By: ASAP

0.1 CONTENT

0.1.1 DOCUMENT HISTORY

Version Date	Reason	

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1.0	17/9/96	Externally published
1.1	8/10/96	Revised for BA Audit and Pathway comments
1.2	31/1/97	Revised for POCL comments and for review towards a definitive version 2.0.
2.0	19/2/97	Revised for further comments. Definitive
2.1	19/5/97	Revised for further comments from DSS, alignment with <i>Access Control Policy</i> Version 1.0, and for review towards a further definitive version 3.0
2.2	8/9/97	Revised in response to implementation questions and further comments from DSS/POCL. Further review towards a further definitive version 3.0
2.3	20/10/97	Revised for comments received during Acceptance Specification discussions and implementation progress
2.4	5/2/99	Revised to extend definition to Commercial Audit Trail and to address Horizon comments dated 1/12/98.
2.5	9/3/99	Further comments received 23/2/99
2.6	9/4/99	Changes agreed at Acceptance Review 30/3/99
2.7	26/4/99	Changes agreed at post Acceptance Review Audit Panel meeting 22/4/99
2.8	09/06/99	Removing references to DSS/BA following their withdrawal from the contract
2.9	24/06/99	Following comments received from POIA.
3.0	01/07/99	Raised to definitive. CCN423
3.1	10/11/99	Insertion of previously missing commercial audit trail details following DSS/BA withdrawal from contract

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0.1.2 ASSOCIATED DOCUMENTS

Version	Date	Title	Source
2.0	24/2/98	Access Control Policy	Pathway
0.4	09/02/98	Host Application Database Design and Interface Standards Pathway	
3.0	3/12/97	Security Functional Specification	Pathway
4.0	30/9/97	Service Architecture Design Document	Pathway
tba		Horizon System Audit Manual	Pathway
5.0		Schedules A03	POCL

0.1.3 TERMS & ABBREVIATIONS

ACD Automated Call Distribution
ADS Advanced Distribution Systems

AP Automated Payment

APS AP Service

DLT Digital Linear Tape
EPOS Electronic Point of Sale

EPOSS EPOSS Service

ESNCS Electronic Stop Notice Control Service

HSAM Horizon System Audit Manual

IM Inventory Management

ISDN Integrated Services Digital Network

OAS OBCS Access Service

OBCS Order Book Control Service
OPS Office Platform Service

RD Reference Data

Rnnn Requirement number

SAP Systeme, Anwendungen, Produkte in der Datenverarbeitung AG, German

software manufacturer

SIS Strategic Infrastructure Service

TIP Transaction Information Processing

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TMS Transaction Management Service

CHANGES HISTORY

0.1.4.1 CHANGES AS BETWEEN 3.0 AND 3.1

Revised schematic for Invoicing procedure.

0.1.4.2 CHANGES AS BETWEEN 2.9 AND 3.0

No changes made. Version number increased.

0.1.4.3 CHANGES AS BETWEEN 2.8 AND 2.9

Minor amendments following feedback from POIA including a revised Commercial Audit Trail section on Invoicing.

0.1.4.4 CHANGES AS BETWEEN 2.7 AND 2.8

Major Surgery to remove all references to DSS and/or BA and their associated requirements following the withdrawal of the Benefit Payment Card from Horizon.

0.1.4.5 CHANGES AS BETWEEN 2.6 AND 2.7

Minor addition around caveats section to Commercial Audit Trail.

0.1.4.6 CHANGES AS BETWEEN 2.5 AND 2.6

Changes agreed at the Acceptance Review of 30/3/99 have been incorporated.

0.1.4.7 CHANGES AS BETWEEN 2.4 AND 2.5

Horizon comments dated 23/2/99 have been factored in.

0.1.4.8 CHANGES AS BETWEEN 2.3 AND 2.4

Horizon comments dated 1/12/98 have been factored in.

0.1.4.9 CHANGES AS BETWEEN VERSION 2.2 AND 2.3

A general overhaul to reflect agreements made in the course of Acceptance Specification negotiations and during design and development.

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0.1.4.10 CHANGES AS BETWEEN VERSION 2.1 AND 2.2

PDA comments dated 19 June have been factored in: defining the mainstream operational Services; extending the list of keys.

Minor clarifications.

0.1.4.11 CHANGES AS BETWEEN VERSION 2.0 AND 2.1

A further set of comments from POCL and DSS have been addressed.

A number of clarifications and corrections have been made.

0.1.4.12 CHANGES AS BETWEEN VERSION 1.2 AND 2.0

A further consolidated set of DSS and POCL comments have been addressed.

0.1.4.13 CHANGES AS BETWEEN VERSION 1.1 AND 1.2

Two sets of comments from POCL have been addressed.

OBCS has been added following the ordering of the service.

Inclusion of raw data from CMS/PAS Help Desk ACDs and the CMS Card Production Interface.

Inclusion of raw data from Horizon Help Desk ACDs.

The requirement texts have been removed pending availability of Version 6 of the agreements (in preparation).

0.1.4.14 CHANGES AS BETWEEN VERSION 1.0 AND 1.1

Clarification of meaning of Pathway native flat formats and removal of immediate dependencies on particular audit authority flat file formats.

Correction to process of record deletions.

0.1.5 CHANGES FORECAST

Addition of material for POCL commercial Clients.

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1. FUNCTIONAL SPECIFICATION

1.1 AUDITOR'S EYE VIEW

1.1.1 SCOPE

This functional specification defines the *operational* and *commercial* audit trails. These are, respectively, the audit trail associated with the operation of the services which make up the Pathway solution and the audit trail associated with that part of Pathway's internal commercial records to which POCL's Internal Auditors or Agents as set out in Schedule A03 may have access.

The operational audit trail includes that generated by the mainstream operational services and the Reconciliation Exceptions Database (RED).

The mainstream operational services are the services making up the POCL Steady State Services:

- Automated Payment Service (APS)
- EPOS Service (EPOSS)
- Order Book Control Service (OBCS)
- POCL Infrastructure Services

The RED provides an auxiliary audit trail which separately covers the treatment of exceptions encountered within the mainstream operational services. The audit trail associated with the mainstream services is never modified for the purposes of correction as such.

This specification also addresses in Section 3 certain requirements, particularly R697, which relate to access by POCL's commercial auditors to parts of Pathway's own internal records and systems. These latter requirements are met through the definition and use of a *commercial* audit trial and associated audit procedure providing for access from within Pathway.

The operational audit trail is retained for 18 months. The commercial audit trail is retained for seven years although some records are held for the life of the contract, which may be longer than seven years.

If the technology used to hold elements of the audit trail becomes obsolete then they will be copied to the new technology to maintain continuity of access.

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1.1.2 THE TOTAL MAINSTREAM PATHWAY SOLUTION

From the standpoint of the auditor, the total mainstream solution, including both the Pathway sub-systems and the source and sink subsystems, is shown in Figure A. The arrows represent the subsystem interfaces at which key auditable events occur. Pathway's responsibilities extend to the subsystems coloured green (darker) and the interfaces coloured blue (darker).

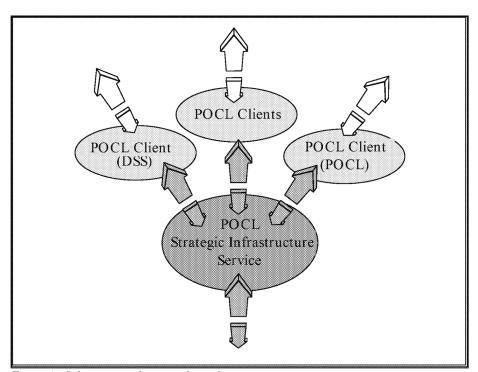


Figure A: Subsystems and principal interfaces

In addition, but not shown, are the Systems Management facilities that Pathway employs in the course of operating the hardware and software and telecommunications platforms themselves.

1.1.3 THE STRATEGIC INFRASTRUCTURE SERVICE

The Strategic Infrastructure Service (SIS) can be analysed as a number of "visible" counter applications to which the post office clerks interface:

- EPOS Service (EPOSS)
- Automated Payment Service (APS)
- Order Book Control Service (OBCS)

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running on an "invisible" middleware messaging transport system:

• Transaction Management Service (TMS)

in turn supported by an operating platform distributed across a Wide Area Network containing:

- instance s of the Office Platform Service (OPS) in each outlet
- · central servers

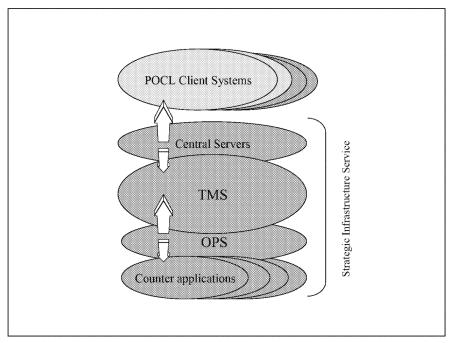


Figure B: Principal components of the Strategic Infrastructure Service

The SIS also contains a telephony interface to callers and interfaces to Systems Management functions (not illustrated).

Figure B shows the SIS components with the same interfaces remapped appropriately.

1.1.4 THE POCL <DSS> CLIENT

The distributed POCL Client representing the DSS back-end system is shown at the component level in Figure C.

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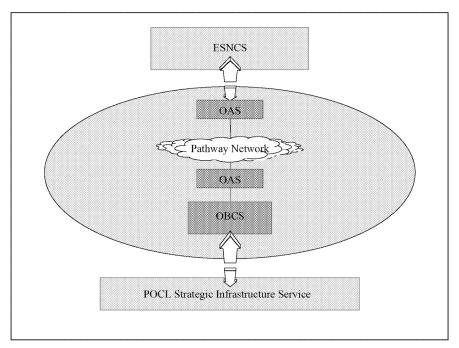


Figure C: Components of the POCL <DSS> Client

It comprises a single, large-scale database Order Book Control Service (OBCS) interfacing across a Wide Area Network through the OBCS Access Service (OAS) to the DSS Electronic Stop Notice Control System (ESNCS).

1.1.5 OTHER POCL CLIENTS

Figure D shows the relationship between the SIS and other POCL Client systems. These client systems comprise both those which belong to the POCL organisation itself and those which belong to POCL's commercial Clients, such as utilities.

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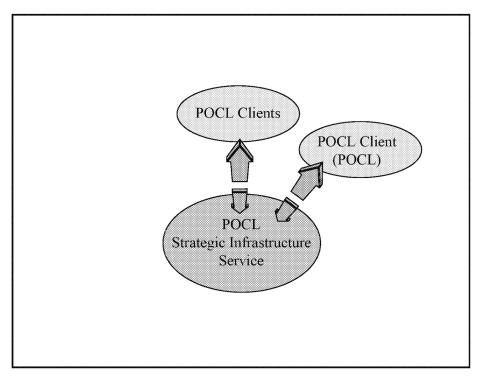


Figure D: Other POCL Clients

1.1.5.1 POCL IN-HOUSE SYSTEMS

The POCL in-house systems which interface to the Pathway SIS are:

- Reference Data
- Transaction Information Processing (TIP)
- SAP Advanced Distribution System (ADS) for inventory management (IM)
- Farnborough Host for AP

The TIP system is batch-oriented, receiving large-scale files of the outlets' transactions. These comprise daily transactions, weekly (normally) stock holdings and a cash account, daily AP Client summaries and daily BA transaction reconciliation reports.

The stock and cash account files are also produced within each office on paper. These signed paper records will, foreseeably, represent the fiduciary record of the outlet's business.

The Reference Data system is responsible for supplying transaction steering data to Pathway. This data describes the relationships and properties of the data to be processed (typing of regions, POCL organisations, outlets, Clients, items for sale, methods of payment, and transaction tokens); and the processing methods

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(processing and validation rules, check digits, calendars, accounting collation sequences, tax tables).

ADS is an on-line system but with a same-day level of response time. It handles orders, secure stock returns, transfers and secure stock inventories, providing for central control interfacing with Pathway's Logistics Feeder Service (LFS)

[DN: ADS/LFS is not implemented at Core System Release.]

Initially traffic associated with POCL's Automated Payment Clients is consolidated to a single interface with an in-house POCL system, the Farnborough AP Host. Later these Clients will have direct interfaces to the Pathway SIS for receiving files of payment records.

1.1.5.2 POCL CLIENT SYSTEMS

This level of specification does not define the audit facilities to be made available to the audit departments of POCL's Automated Payment commercial Clients. These facilities will be negotiated between POCL and the Client as part of the AP Migration Plan Interface specification for each Client. Pathway expects that these Clients will use the same methods as are used for the Farnborough host. It has been decided by POCL that such Client systems will NOT access the Pathway SIS directly to provide customer and payment scheme reference data (transaction steering data). Such data will be passed through the POCL Reference Data system.

1.2 AUDIT TRAIL RESPONSIBILITIES AND USAGE

1.2.1 RESPONSIBILITIES

1.2.1.1 TRACKS AND TRAILS

In the description below use is made of the terms *audit track* and *audit trail*. An audit track is a record of activities made within a Pathway subsystem for one or more of its interfaces. An audit trail is one or more such tracks. The data recorded in a trail's several tracks may represent the treatment of related transfers and processing.

In general it is possible to produce an audit track for an interface on either side of that interface, or, if the interface is itself problematic, on both sides.

It is of course a matter for POCL and POCL Clients to produce their own audit tracks on their sides of the interfaces to Pathway.

1.2.1.2 TWO TRACKS

The Pathway audit trail is based upon files representing the single main audit track representing the traffic running through the Pathway solution, the POCL SIS. This

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system is Pathway's operational responsibility and its operating interfaces are also under Pathway control.

As discussed above, a second audit track represents the systems management operation of the Pathway system itself.

1.2.2 PRINCIPALS, AGENTS AND RIGHTS OF ACCESS

A particular audit may be carried out by an Agent for POCL or by POCL themselves. The Agents that are permitted are defined in Schedule A03.

Pathway provides for rights of access for individual roles and enforces these rights of access. Changes to these rights is via Change Control.

1.2.3 ACCESS CONTROLS

Access controls are effected through the use of roles.

There are THREE auditor roles: POCL Emergency Manager/auditor, POCL auditor and POCL Client <C> auditor. It may not be necessary to represent the POCL Emergency Manager/auditor and POCL auditor separately.

The POCL auditor roles are further defined in the HSAM.

The POCL Emergency Manager/auditor has the same access rights as that of the Manager or Postmaster. In addition, he may delete and create a Manager/Postmaster Role, and produce a cash account. Access as POCL Emergency Manager/auditor is via initial access as POCL auditor then, if required, as in the case of the Manager or Postmaster being unavailable, a further exchange via the Horizon Help Desk to obtain a one-shot password which enables the additional Emergency Manager/auditor operations and a key reference which turns on the filestore encryption/decryption.

POCL Emergency Manager/auditor and POCL auditor have access to all TMS journal records.

The POCL auditor has no rights to modify the TMS journal. The POCL Emergency Manager/auditor is not able to modify the TMS journal, except as the auditable result of permitted operations in connection with his role as an Emergency Manager. In common with all journal updates, such permitted modifications are always in the form of appends.

The POCL Client <C> auditor role when implemented will have access only to that part of the TMS journal which deals with transactions pertaining to that Client and in accordance with the Client organisation's contract with POCL. The POCL Client <C> auditors have no rights to modify the TMS journal.

The POCL Emergency Manager/auditor has access only at the outlet. The POCL auditor has access at both the outlet and the centre. All access at the centre is via the Pathway audit function.

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1.2.5 POCL USAGE

POCL Audit functions has access to POCL SIS audit trackand the Systems Management track

1.2.6 POCL CLIENT USAGE

POCL Client Audit functions will have access to:

• POCL SIS track (subject to paragraph 1.2.2 above)

1.2.8 AUDIT TRAIL FORMATS

1.2.8.1 NATIVE FORMATS

The principle followed is that Pathway originates the audit track source data in self-describing flat files.

The format in which the TMS journal is written by Pathway operational software is that used as input to the utilities which prepare the bulk extracts for the audit authorities. That is, the Pathway native flat format <u>is</u> the operational format. This format is attribute grammar (keyword and value) format and is therefore self-describing at the field level. Subsets of the TMS journal represent the data transferred to TIP, Farnborough AP, ADS and POCL Clients, and from RD, ADS, possibly POCL Clients.

The native format of the flat files containing the data transferred between subsystems is described in file headers. They are therefore self-describing at the file level. See *Host Application Database Design and Interface Standards*.

The logs of file transfers (control files) are in one simple format.

1.2.8.2 CUSTOM FORMATS

The TMS journal native flat format is not to be further transformed.

Custom formats for other audit files may be specified at a later level of specification.

Transfer is either downloaded from disk or by CDROM.

As a principle, the less transformation the better, since this preserves more of the original raw data and removes the need to qualify and maintain transforming software.

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1.2.9 AUDIT TRAIL RETENTION PERIODS

R699 states: "Subject to Clause 801 of the Related Agreements, audit trail records shall be retained for a period consistent with Companies Act requirements, or for a period of eighteen (18) months, whichever is longer." The records described in this document are not subject to the provisions of the Companies Act. Clause 801 refers to Records which correspond to the commercial audit trail. A general retention period of 18 months is required for the operational audit trail. See also R816 and R914.

R829, which deals with Prosecution Support, requires Audit Trail and other information may be retained for potentially longer periods.

Of course, certain archived data such as EPOSS administration functions, which contain dated internal references, will itself have an implied longevity of more than 18 months.

2. THE AUDIT TRACKS

2.1 POCL SIS AUDIT TRACK

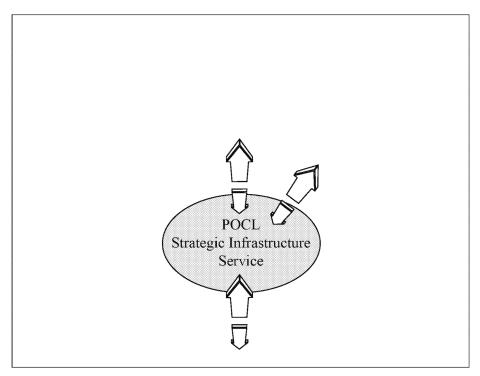


Figure E: The POCL SIS track

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2.1.1 POCL SIS TRACK CONTENT AND MAINTENANCE

The POCL SIS audit track comprises:

• the TMS journal

and those POCL files exchanged between the Pathway data centres:

- the POCL Horizon Help Desk files
- POCL's own systems' files
- AP Client files

Any other intermediate file or table constructs do not form part of the track.

2.1.1.1 TMS JOURNAL

The audit archive of the TMS journal is taken daily at the correspondence server level by copying all new messages that day to Digital Linear Tape (DLT) audit archive media.1

The TMS journal comprises records appended to the journal of each outlet within a messaging group usually in time sequence. Each group includes correspondence servers which hold a replica of the outlet. The outlet replica(s) of the journal are housekept from the front periodically to maintain a recent history to cover at least three cash account periods. The correspondence servers' replicas are similarly housekept.

The TMS journal contains the original transaction details, including its origin, when it happened, who caused it to happen, and the outcome.

2.1.1.2 HORIZON HELP DESK

The POCL Horizon Help Desk files contain the call records from the Automated Call Distribution (ACD) system. These are written during operation and harvested daily into a flat file. A control file will be written for each such daily file.

2.1.1.3 POCL SYSTEMS

These comprise:

- those at the TIP, RD, Farnborough AP and ADS interfaces holding control records describing files being transferred
- There is no systematic value in holding separate audit copies of the raw data transferred across these interfaces with TMS because this is what the TMS

¹ This represents an improved implementation. By this method the audit trail is always up to date and in one place.

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journal itself represents and because the TIP, Farnborough AP and ADS transfers are selective extracts of it.

References to ADS/LFS are not definitive at this level of specification.

2.1.1.4 AP CLIENT SYSTEMS

These are to be defined at later levels of specification. The expectation is that these will correspond to those for POCL Systems.

2.1.1.5 POCL <DSS> CLIENT

The specific DSS element of the POCL Audit Track comprises the following files outside the Pathway boundary:

· that at OAS with ESNCS

and within the boundary:

- that at OBCS
 - with TMS

Any other intermediate file and table constructs do not form part of the track.

OBCS

This comprises:

- the Control Notice updates table for access by the OBCS TMS Loader Agent, and:
- OBCS transactions, comprising encashment transactions and totals table received from the OBCS TMS Harvester Agent

The data used to represent these are the serial files transferred to and from OAS.

An audit control file provides as a permanent record of all files received and transferred by OAS.

This file is kept permanently on-line within OAS(VME). It is also transferred in its entirety to the ICL Pathway Sequent as part of the daily housekeeping process.

2.1.2 AUDIT ACCESS TO THE POCL SIS TRACK

Logical audit access will be provided as follows:

2.1.2.1 TMS JOURNAL ACCESS AT THE OUTLET

Views of the transactions which have taken place within a whole post office during the recent past are available from any counter or back office position within a post office, subject to the auditor himself having appropriate access rights. This recent

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past period for which transaction records will remain at any workstation in the post office varies inversely with the traffic conducted by that office as a whole, but is not less than the current and two previous cash account periods, such periods being typically a week. The term "transactions" here embraces both the serving of customers and EPOSS administration events. The journal is also used to carry certain Pathway control sequences. These are of no intrinsic interest to auditors but their retention within the message numbering means that auditors can be sure there are no missing records².

2.1.2.2 TMS JOURNAL ACCESS AT THE CORRESPONDENCE SERVERS

Equivalent TMS journal data is maintained at each of the two Pathway central services sites. These are not copies one of the other but are independently derived from the same original data by the same systems. They will therefore provide a natural point of systematic reconciliation: for example, on a sample basis it is possible to compare the audit track record of the same transaction recorded in two places to verify that systems were operating consistently.

Audit records are written to DLT audit archive media. They are presented in exactly the same way as recent records when retrieved although will be subject to filters appropriate to the selection and the audit authority for which the selection is being made. Archive records will take a longer time to retrieve, typically up to 30 minutes.

If and when the TMS service provider changes, then the TMS journal will be transferred to the new provider as part of the transfer agreement. Apart from the longevity of data retention and the associations of data with post offices, these views are equivalent to those taken in the post office. It is understood that the vast majority of POCL audits will be conducted within the post offices, with resort to the Correspondence Server views only where the outlet views are not available (denial, destruction) or, of course, where the historical record is required.

Access from one outlet to the data of another or to the back-history data on the correspondence servers is not provided.

Although the bulk of the TMS journal data is transferred to TIP, R699 specifies that the audit trail shall be maintained and retained by Pathway and protected by security measures.

2.1.2.3 HORIZON HELP DESK LOG FILE ACCESS

This comprises simple access to serial flat file. File selection will be by date or dates. Search of the selected file will be by ordinary text search.

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2.1.2.4 POCL SYSTEMS FILES ACCESS

This comprises simple access to the control files, potentially followed by access to other files transferred to the TMS journal.

2.1.2.5 POCL CLIENT FILES ACCESS

This will be defined at a later level of specification.

2.1.2.6 AUDITOR UTILITIES

2.1.2.6.1 Interactive access

2.1.2.6.1.1 ACCESS USING KEYS

In both the post office and correspondence server cases audit facilities are provided to retrieve, store locally, display and/or print one or more transaction records, with the selection being based on simple keys. Key elements may be drawn from certain selected keys in the transaction records.

These key elements will be:

- one or more outlets as defined by reference data, e.g. POCL Region
- stock unit
- · clerk id
- interval of time
- POCL Client identity
- one or more product codes

Other specific key elements may be defined at a later level of specification in the light of experience.

The keys which an auditor may use will be in accordance with the auditor role.

Controls will be available to limit the selection to practical length. Initially this control will be set at 256 records.

Disk serial files thus produced may be saved for later local search.

2.1.2.6.1.2 ACCESS USING STANDARD REPORTS

The following table categorises and lists the operations to be supported by POCL auditor and POCL Emergency Manager/auditor use of EPOSS facilities, taken from notes of 17/12/96. Auditor access to such operations is a function of POCL auditor or POCL Emergency Manager/auditor role management. It is believed that there are

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no auditor-specific actions required. In all meaningful cases print or print-preview is provided.

Where access to the outlet itself is not possible, as for example when an outlet has been destroyed by fire, equivalent access might be effected by visit to a correspondence server centre or by restarting the outlet at an auditor centre or a replacement centre.

Category	Report
POCL Auditor	
Outlet asset verification	Cash account for selected week
	Interrogate Transactions
	Daily summaries
	Cash on hand
	Stock on hand
	Rems in and out
	Suspense account
	History of losses and gains
Stock unit asset verification	Counter balances
,	Internal transfers
Role verification	Statement of users
Collateral verification	Order books on hand
POCL Emergency Manager/auditor	
Role management	Delete/create users
	Statement of users
Restatement on unexpected loss	Cash and stock declaration
	Rem out
	Current cash account transactions
	Daily summaries
	Cash account

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Effect transactions

Any transaction normally available to the Postmaster

2.1.2.6.2 Bulk access using keys

Bulk access is provided in the correspondence server centres only. A utility is provided to produce bulk selections according to the role of the auditor and in the custom magnetic format specified by the audit authority to which he belongs. POCL Client audit authorities may require different formats from those used by POCL but Pathway proposes that they be required to use the Pathway native flat format directly. Clearly, subject to the terms of POCL's contract with a POCL Client, the data accessed will be limited to that pertaining to that Client.

The bulk selection utilises the same keyed access methods as for interactive access. Additional key fields to represent one or more post offices will be available. The selections are, in principle, of unlimited length. Long selections, where the audit function expects greater than 1 million records from direct access or 100,000 records from archive media, or numbers of selections which would disrupt operational schedules are ordered or scheduled by mutual agreement. Selections confined to the data which is on direct access may be undertaken in emergencies.

Such bulk files are delivered to one location using media and transport methods to be agreed. Bulk selections except the very largest may be file-transferred over the same communications as are used for TIP and eventually Client AP. It is essential that the security of any such path used be no less than that of these paths. Very large selections are transferred only in CDROM form and are either collected from Pathway or couriered by Post Office Special Delivery to one location.

Regular use of bulk selections allows audit functions to build up a history for own use.

In the event that the audit function requires direct, personal and extempore access to the actual TMS operational journal then this access will be by attendance at a Pathway centre and will be supervised by Pathway.

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2.2 SYSTEMS MANAGEMENT TRACK

2.2.1 SYSTEMS MANAGEMENT TRACK CONTENT AND MAINTENANCE

The track is made up of audit events for the particular domain in question. In the Pathway solution all events are generated within domains and eventually transferred to the Tivoli Event Management Server.

Within these domains events are collected by Tivoli Agents and transformed into Tivoli Events. On non-NT platforms the Tivoli Agent role is performed by an equivalent agent function within the local systems management facility appropriate to the platform.

These non-NT platforms are:

- the Sequent Servers, whose events are relayed by BMC Patrol
- SUN Servers, whose events are notified directly
- Network Devices, such as routers, whose events are mediated by HP OpenView

Audit events comprise:

- System Events, which include Security Events
- Status Reports
- Software Distributions

System Events are gathered from all domains, and Status Reports and Software Distributions from all Windows NT domains.

Tivoli provides extensive event management facilities including central display, sorting and filtering before viewing, for example, all operations initiated by a particular operator. These facilities are accessed via a PC-based Tivoli Desktop available to the Pathway Systems Management functions located in Stevenage and Lytham St Annes and connected via the Pathway WAN to the master Tivoli Management Region, or hierarchic level which is at Bootle.

These Tivoli Events are extracted from the Tivoli Event Management Server and archived using the standard Archive Service. Filters are used to remove unusable operational events before archiving. Archiving is in Comma Separated Variable (CSV) format.

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2.2.2 AUDIT ACCESS TO THE SYSTEMS MANAGEMENT TRACK

2.2.2.1 INTERACTIVE ACCESS

Archived data may be restored from CSV format and viewed using native Tivoli facilities.

2.2.2.2 BULK ACCESS

This will be facilitated as follows:

- the Tivoli events will be archived daily
- analysis can be either by Notepad-type browsing the archive file or by importing from CSV format into a database or editor of choice

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3. THE COMMERCIAL AUDIT TRAIL

The commercial audit trail is defined to comprise material, held in either magnetic forms or definitively on paper, to which the Authorities have access.

3.1 MAGNETIC RECORDS

These comprise copies of certain Operational Support records that the Authorities receive as part of the Steady State and other Services, and those parts of ICL Pathway's internal commercial records to which the Authorities have automated access.

The tracks making up the magnetic commercial audit trail are:

- Reconciliation Exceptions Database (RED)
- Service Level Contract Administration (SLCA)

3.1.1 RED

RED is free-standing from the mainstream Pathway Solution. It is a record of the activities undertaken by the Pathway Customer Service Business Support Unit to make necessary adjustments to transactions, typically to effect accurate reconciliations. It is implemented as a Microsoft Access database. Usage is by import to Microsoft Access.

3.1.1.2 DATA RETENTION REQUIREMENTS

Requirement 697 calls for this data to be retained, in effect, for 7 years.

3.1.1.3 AUDIT ACCESS TO OPERATIONAL SUPPORT RECORDS

Access is obtained via the procedures contained within the HSAM.

3.1.2 SLCA

3.1.2.1 SLCA CONTENT AND MAINTENANCE

SLCA, and its associated reporting system Service Level Agreement Monitoring (SLAM) are used to compare the performance of the Horizon system against a

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number of measures established in the contract Schedule B03. It does this by taking information feeds from the Data Warehouse (DW) and running these against special formulae, again established in the contract. SLAM is used to report the outcome of these calculations to the Horizon Service Management Group, a Pathway/POCL committee.

The following diagram shows the main data flows within SLCA.

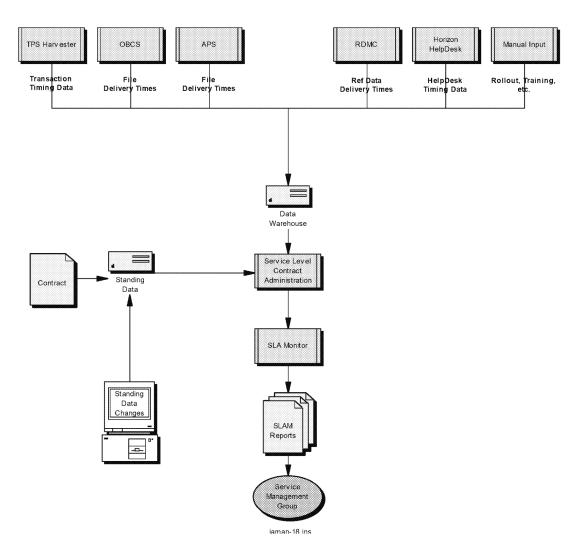


Figure H: SLCA Schematic

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3.1.2.2 INPUT STREAMS

• Automatic Transaction Data held as Oracle tables within the DW.

- Manual Transaction Data (Achievement of Rollout, achievement of Training etc).
- Standing Data SLA parameters and formulae used to calculate achievement are held as Oracle tables within the DW.

3.1.2.3 CHANGES TO STANDING DATA

Changes to the SLA Parameters and mathematical formulae are allowed via an Administration Facility within the SLCA system. Physical access to this facility is strictly controlled and password controls are used to control logical access.

Changes to the parameters and/or formulae require pre-authorisation through the Change Control process before they can be applied. A CCN number must exist for each change.

Records of changes to Standing Data, including Contract, Contract SLA, Performance Measure and Liquidated Damages are maintained:

- For each field in the Contract table created, amended or deleted a record of the change
- For each field in the Contract SLA table created, amended or deleted a record of the change
- For each field in the Performance Measures table created, amended or deleted a record of the change
- For each field in the Liquidated Damages table created, amended or deleted a record of the change

3.1.2.4 OUTPUT STREAMS

- Data output from the various calculations are passed to Service Level Agreement Monitor (SLAM) where they are converted into graphs and histograms for presentation to interested groups among them the POCL/Pathway Service Management Group. SLAM is a passive system insofar that it does not carry out any processing other than to transform tables of numbers into graphical representations.
- Remedy Calculations are generated by SLCA for subsequent application during the quarterly invoicing cycle within the Common Charging System. These values are held as Oracle tables within the DW.

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3.1.2.5 DATA RETENTION REQUIREMENTS

Requirement 697 calls for this data to be retained, in effect, for 7 years.

3.1.2.6 AUDIT ACCESS TO SLCA

Access is obtained via the procedures contained within the Horizon Audit Manual.

3.2 MANUAL RECORDS

These comprise Pathway records that are held definitively on paper to which the Authorities have access.

3.2.1 INCLUDED ITEMS

The scope of this list is restricted to items of significance to POCL.

3.2.1.1 INVOICING

System Overview

Although the generation of an Invoice is a manual activity, and the core Invoice values and frequencies are determined by the Contract between POCL and ICL Pathway, there are a number of variable elements that are applied to each Invoice:

- Transaction volumes where the actual transaction count is compared to a benchmark value and an adjustment factor calculated.
- Outlet availability during the Invoice period.
- Numbers of outlets actually rolled-out during NRO compared to original target.
- Liquidated damages arising from failures to achieve SLA commitments.

The Contract also allows for RPI adjustments.

Interim, or ad-hoc, invoices can be generated at any time although these do not become committed and are used for internal reporting purposes only.

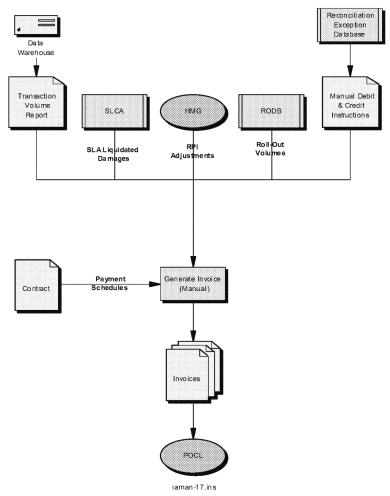
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Schematic

The following diagram shows the main data flows within the Invoicing process.



Data Input Streams

Transaction Data

Transaction volume data taken by the TPS Harvester.

Outlet Data

Outlet availability data. (NB Source of this data not yet finalised).

Count of Outlets rolled-out taken from Roll-out database.

Contractual Data

Capital sum payments during National Roll-out. Based on the later of a pre-defined date or cumulative number of Post Offices rolled out.

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Operating fees during operating period. Monthly fee subject to Transaction and Availability factors.

- Transaction Component factor. A 7% factor based on actual transactions made compared to an agreed benchmark value.
- Outlet Cost Component factor. A 32% factor based on the availability of outlets during the Invoicing period.

Manual Data

Debit Instructions from RED.

Credit Instructions from RED.

These are manual notifications that are applied to the Invoice during its production cycle. (There are, currently, no identified occurrence that might cause a RED Instruction to be raised but it is included for completeness.)

Changes to Contractual Data

Changes to any element of the Contractual data can only be achieved through formal negotiation between the two parties.

Output Stream

The invoicing suite of documents consists of the following:

- a. Capital Payment Invoice
- b. Operating Fee Invoice
- c. Advice Note for OFI.
- d. Credit Note for service credits.
- e. General Invoice for ad-hoc supply of goods and services.
- f. RPI Adjustment Tracking Schedule.

Data Retention Requirements

Requirement 697 calls for these records and data to be retained for 7 years.

3.2.1.2 CHANGE CONTROL DOCUMENTATION

Change Control is an agreed process through which changes to the Horizon are defined, notified, impacted and costed, authorised and controlled.

Documents that are output from the process and which represent the audit trail of proposed changes and their outcome are:

- Change Request: used by sponsors to request changes of Pathway.
- **Change Proposals**: used by Pathway to progress the change through the Change Control process.

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• **Change Control Note**: used by Pathway to request approval for a change from the sponsors.

- Supplier Change Request: used by Suppliers to request changes to their services to Pathway.
- **CCB Meeting minutes**: used to record the outcome of Change Control Boards where individual Change Proposals are reviewed.

Retention: Contract life or seven years whichever is the greater.

3.2.1.3 SPECIAL ASSISTANCE INVOICES

Schedule A03 of the Codified Agreements enable Pathway to charge for costs incurred in assisting POCL with audit activity following contract termination. Records relating to time spent and expenses will be maintained on a case by case basis.

Retention: Contract life or seven years whichever is the greater.

3.2.1.4 DEVELOPMENT ACTIVITY INVOICES

Where Fixed Price contracts are entered into on the basis of estimates documented in Change Control Notes (CCN) or elsewhere then the CCN under which the work is authorised forms the commercial record. Where work is conducted on a Time and Material basis records relating to time spent on that work will be maintained. Note that that this element includes studies undertaken as part of the Change Control process.

Retention: Contract life or seven years whichever is the greater.

3.2.1.5 CONTRACTS WITH SUB-CONTRACTORS

Access is limited to contractual and service related arrangements.

Retention: Contract life or seven years whichever is the greater.

3.2.2 EXCLUDED ITEMS

The following items are outside the scope of 'Records' as defined in R697:

- Financial arrangements with Pathway sub-contractors.
- Financial and employment arrangements with Pathway employees, both direct and contract.
- The ICL Pathway Business Case.
- General accounting information including funding.
- Reports from and to ICL Group or Fujitsu.

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There may be other documents or records that are subsequently added to this list.

3.2.3 CAVEATS

There are two caveats that apply to the above lists:

- Special access to records not identified as 'included' may be granted on a case by case basis, subject to request and approval at the appropriate level.
- The scope of access to records identified as 'included' must be agreed as part of agreeing Terms of Reference for an audit as described in the Joint Working Framework.

It is possible that records and/or documents will be identified during an audit that were not included in the original Terms of Reference. Pathway Internal Audit will facilitate the release of these records and/or documents through the appropriate channels subject to the records not being on the 'Excluded' list.