Witness Statement

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

POH - 3832D

POST OFFICE ®

Statement of   Penelope Anne Thomas

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

This statement (consisting of 7 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   28........day of....September..... 2009

Signature   **GRO**

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

Horizon's documented procedures stipulate how the Horizon System operates, and while I am not involved with any of the technical aspects of the Horizon System, these documented processes allow me to provide a general overview.

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

The Horizon system provides a number of daily and weekly records of all completed

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transactions input into it. It enables Post Office users to obtain computer summaries for individual clients of Post Office Limited e.g. Alliance & Leicester. The Horizon system also enables the clerk to produce a periodic balance of cash and stock on hand combined with the other transactions performed in that accounting period, known as a trading period.

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

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

Information from counter transactions is written into a local database and then replicated automatically to databases on all other counters within a Post Office outlet. The information is then forwarded over ADSL (Asymmetric Digital Subscriber Line) or other communication service, to databases on a set of central Correspondence Servers at the Fujitsu Services data centres. This is undertaken by a messaging transport system within the Transaction Management Service (TMS). Various systems then transfer information to Central Servers that control the flow of information to various support services. Details of outlet transactions are normally sent at least daily via the system. Details are then forwarded daily via a file transfer

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service to the Post Office accounting department at Chesterfield and also, where appropriate, to other Post Office Clients.

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

The system clock incorporated into the desktop application on the counter visual display units is configured to indicate local time. This has been the situation at Preston Road, Branch Code 259020 since 15 November 2000 when the Horizon system was introduced at that particular Post Office.

The Horizon system records time in GMT and takes no account of Civil Time Displacements, thus during British Summer Time (BST) (generally the last Sunday in March to the last Sunday in October), system record timings are shown in GMT – one hour earlier than local time (BST).

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

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During audit data extractions the following controls apply :

1. Extractions can only be made through the AWs which exist at Fujitsu Services, Lovelace Lane, Bracknell, Berkshire and Fujitsu Services, Sackville House, Brooks Close, Lewes, East Sussex. These sites are both subject to rigorous physical security controls appropriate to each location. All AWs are located in a secure room subject to proximity pass access within a secured Fujitsu Services site.

2. Logical access to the AW and its functionality is managed in accordance with the Fujitsu Services, Post Office Account Security Policy and the principles of ISO 17799. This includes dedicated Logins, password control and the use of Microsoft Windows NT security features.

3. All extractions are logged on the AW and supported by documented Audit Record Queries (ARQs), authorised by nominated persons within Post Office Ltd. This log can be scrutinised on the AW.

4. Extractions are only made by authorised individuals.

5. Upon receipt of an ARQ from Post Office Ltd they are interpreted by CS Security. The details are checked and the printed request filed.

6. The required files are identified and marked using the dedicated audit tools.

7. Checksum seals are calculated for audit data files when they are written to audit archive media and re-calculated when the files are retrieved.

8. To assure the integrity of the audit data while on the audit archive media the checksum seal for the file is re-calculated by the Audit Track Sealer and compared to the original value calculated when the file was originally written to the audit archive media. The result is maintained in a Check Seal Table.

9. The specific ARQ details are used to obtain the specific data.

10. The files are copied to the AW where they are checked and converted into the file type required by Post Office Ltd.

11. Windows Events generated by the counters within the branch/timeframe in question are checked to ensure the counters were functioning correctly.

12. The requested information is copied onto removal CD media, sealed to prevent modification and virus checked using the latest software. It is then despatched to the

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Post Office Ltd Casework Manager using Royal Mail Special Delivery. This ensures that a receipt is provided to Fujitsu Services confirming delivery.

ARQs 482 to 486/0809 were received on 11 December 2008 and asked for information in connection with the Post Office at Preston Road, Branch code 259020.
ARQ 024/0910 was received on 23 April 2009 and asked for information in connection with the Post Office at Preston Road, Branch code 259020. I produce copies of ARQs 482 to 486/0809 and 024/0910 collectively as Exhibit PT/01.

I undertook extractions of data held on the Horizon system in accordance with the requirements of ARQs 482 to 486/0809 and followed the procedure outlined above. I produce the resultant CD as Exhibit PT/02. This CD, Exhibit PT/02, was sent to the Post Office Investigation section by Special Delivery on 17 December 2008.
I undertook extractions of data held on the Horizon system in accordance with the requirements of ARQ 0240/0910 and followed the procedure outlined above. I produce the resultant CD as Exhibit PT/03. This CD, Exhibit PT/03, was sent to the Post Office Investigation section by Special Delivery on 29 April 2009.

The report is formatted with the following headings:

      ID – relates to counter position

      User – Person Logged on to System

      SU – Stock Unit

      Date – Date of transaction

      Time – Time of transaction

      SessionId – A unique string relating to current customer session

      TxnId – A unique string relating to current transaction

      Mode – e.g. SC which translates to Serve Customer

      ProductNo – Product Item Sold

      Qty – Quantity of items sold

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SaleValue – Value of items sold

Entry method - Method of data capture for Transactions (0 = barcode, 1 = manually keyed, 2 = magnetic card, 3 = smartcard, 4 = smart key)

State – Relates to OBCS

IOP - Order Book Number – OBCS only

Result – Order Book Transaction Result – OBSC only

Foreign Indicator – Indicates whether OBCS payment was made at a local or foreign outlet (0- Local, 1- Foreign). The foreign indicator defaults to a '0' for all manually entered transactions - OBCS only

The Event report is formatted with the following headings:

Groupid – FAD code

ID – relates to counter position

Date – Date of transaction

Time – Time of transaction

User – Person Logged on to System

SU – Stock Unit

EPOSSTransaction.T – Event Description

EPOSSTransaction.Ti – Event Result

Type – Inactivity Logout noted

Logout Authority – User who logged out the account

SecurityEvent.User – User who failed to log in

There is no reason to believe that the information in this statement is inaccurate because of the improper use of the system. To the best of my knowledge and belief at all material times the system 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 within it.

Any records to which I refer in my statement form part of the records relating to the business of Fujitsu Services. These were compiled during the ordinary course of business from

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information supplied by persons who have, or may reasonably be supposed to have, personal knowledge of the matter dealt with in the information supplied, but are unlikely to have any recollection of the information or cannot be traced. As part of my duties, I have access to these records.

Signature   GRO   Signature witnessed by   GRO

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

Address	Fujitsu Services, Lovelace Road, Bracknell, Berkshire, RG12 8SN

E Mail: penny.thomas **GRO**

Mobile Tel No:		Business telephone No:	**GRO**
Occupation:.	Prosecution Support Analyst	Date and place of birth:	**GRO**
Maiden name.:	Langley	Identity code:	

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

October 2009							November 2009							December 2009							January 2010						
M	TU	W	TH	F	SA	SU	M	TU	W	TH	F	SA	SU	M	TU	W	TH	F	SA	SU	M	TU	W	TH	F	SA	SU
			1	2	3	4	30						1		1	2	3	4	5	6					1	2	3
5	6	7	8	9	10	11	2	3	4	5	6	7	8	7	8	9	10	11	12	13	4	5	6	7	8	9	10
12	13	14	15	16	17	18	9	10	11	12	13	14	15	14	15	16	17	18	19	20	11	12	13	14	15	16	17
19	20	21	22	23	24	25	16	17	18	19	20	21	22	21	22	23	24	25	26	27	18	19	20	21	22	23	24
26	27	28	29	30	31		23	24	25	26	27	28	29	28	29	30	31				25	26	27	28	29	30	31

February 2010							March 2010							April 2010							May 2010						
M	TU	W	TH	F	SA	SU	M	TU	W	TH	F	SA	SU	M	TU	W	TH	F	SA	SU	M	TU	W	TH	F	SA	SU
1	2	3	4	5	6	7	1	2	3	4	5	6	7				1	2	3	4	31					1	2
8	9	10	11	12	13	14	8	9	10	11	12	13	14	5	6	7	8	9	10	11	3	4	5	6	7	8	9
15	16	17	18	19	20	21	15	16	17	18	19	20	21	12	13	14	15	16	17	18	10	11	12	13	14	15	16
22	23	24	25	26	27	28	22	23	24	25	26	27	28	19	20	21	22	23	24	25	17	18	19	20	21	22	23
							29	30	31					26	27	28	29	30			24	25	26	27	28	29	30

Additional contact point, if difficulty with above:	Service Support Manager, RMG Account, Fujitsu Services
Address:	Lovelace Road, Bracknell, Berkshire, RG12 8SN

Telephone No: Mobile No:	**GRO**	Fax No:	

STATEMENT TAKEN BY (print name)	
Office	

Thomas Penny

From:	tony.jeffery@ ___GRO___ on behalf of fraud.team@ ___GRO___	
Sent:	23 September 2009 14:48	
To:	Thomas Penny	
Cc:	Gallacher Kirsty; Dunks Andy	
Subject:	Statement request 0910 008. ARQ's 482 - 486/0809 & 024/0910.	

Could you please provide a witness statement, covering the data suplied, in respect of
the above.

Preston Road 259020.

Regards
Tony
Letters Administrator
Post Office Ltd Security - Fraud Strand
P.O. Box 1, CROYDON, CR9 1WN
STD: ___GRO___ . Fax: ___GRO___
External email address: fraud.team@ ___GRO___

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Royal Mail Group Limited registered in England and Wales registered number
4138203 registered office 3rd Floor, 100 Victoria Embankment, London, EC4Y 0HQ

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Presto Rd
259020

024/0910   482-6/0809
Rec 23 Apr 09   Rec   11 Dec 08   15 Nov 00.
Posted 29 Apr 09   Posted 17 Dec 08.

6 Sep 00 — counters installed

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AUDIT RECORD QUERY (ARQ)

Originator:	Dave Posnett Post Office Ltd Security - Fraud Security Programme Manager PO Box 1, CROYDON, CR9 1WN	Date:	23rd April 2009
Tel:	**GRO**		

Witness Statement required (Yes or No as applicable)	NO	ARQ Ref No: APOP Ref. No:	0910/024. 0910/Not applicable.

Branch Name:	Preston Road	Code:	259020	Date Range:	03/03/08-02/04/08

Standard Format Requirements (Not required for APOP requests):	A report of all transactions and events (including inactivity logout and logon/log off information) for the office including remittances received, transfers between stock units and error notices. Information to be provided in Excel 97 format with each category in a separate column. Column headers as follows - ID, User ID, Stock unit, date, time, Session & transaction ID, Mode type - i.e. Serve Customer, Reversal, Rem In etc, Product number, quantity, Amount £p, entry method. Also where applicable dependant on date range, please specify whether an OBCS (& state) of scan accompanied the transaction.

Additional Requirements	YES/NO
APOP Voucher information is required for voucher number(s):	NO
Analyses of hsh call logs (detail period if different from above date range). Period: .	NO
Confirmation that there was no reported system malfunctions during the date range period.	NO
Barcode information for all remittance pouches (inward & outward) during the period.	NO
Barcode and car licence details for all DVLA related transactions.	NO
PAN or equivalent identifier (i.e. credit / debit card details).	NO
Other (Provide details): .	NO

Signed:	VIA E MAIL - *Dave Posnett*

AUDIT RECORD QUERY (ARQ)

Originator:	Dave Posnett Post Office Ltd Investigation Team Casework Manager PO Box 1, CROYDON, CR9 1WN		Date:	11ᵗʰ December 2008
Tel:	GRO			

Witness Statement required (Yes or No as applicable)		NO	ARQ Ref No:	0809/482-486
			APOP Ref. No:	0809/Not applicable

Branch Name:	Preston Road	Code:	259020	Date Range:	03/04/08-03/05/08
					04/05/08-03/06/08
					04/06/08-04/07/08
					05/07/08-04/08/08
					05/08/08-03/09/08

Standard Format Requirements (Not required for APOP requests):	A report of all transactions and events (including inactivity logout and logon/log off information) for the office including remittances received, transfers between stock units and error notices. Information to be provided in Excel 97 format with each category in a separate column. Column headers as follows - ID, User ID, Stock unit, date, time, Session & transaction ID, Mode type - i.e. Serve Customer, Reversal, Rem In etc, Product number, quantity, Amount £p, entry method. Also where applicable dependant on date range, please specify whether an OBCS (& state) of scan accompanied the transaction.

Additional Requirements	YES/NO
APOP Voucher information is required for voucher number(s):	NO
Analyses of HSH call logs (detail period if different from above date range). **PERIOD:**	NO
Confirmation that there was no reported system malfunctions during the date range period.	NO
Barcode information for all remittance pouches (inward & outward) during the period.	NO
Barcode and car licence details for all DVLA related transactions.	NO
PAN or equivalent identifier (i.e. credit / debit card details).	NO
Other (Provide details): .	NO

Signed:	VIA E MAIL – *Dave Posnett*

V4 November 2007