From: Parsons, Andrew GRO

Sent: Fri 09/05/2014 3:01:05 PM (UTC)

To: Angela Van-Den-Bogerd GRO

Cc: Rodric Williams GRO

Subject: RE: Strictly Private & Confidential - Subject to Privilege [BD-4A.FID20472253]

Angela

I spoken to Rodric. The interim answer to SS' question is:

∀ As requested at the WG meeting Post Office are asked to produce a formal certification that it is not possible for anyone to access Horizon/HOL and amend transaction data without the knowledge of the Subpostmaster or their staff.

"It is not clear what is meant by "formal certification" but enquiries have been made of senior personnel at Fujitsu and in Post Office's IT team. There is no functionality in the Horizon system (through either a front-end terminal or back-end server) to edit or delete transaction data once it has been transmitted from a branch to the central branch data centre. The transmission of this data is encrypted, transferred to the branch data centre and then stored in a separate audit server where they are sealed using industry standard secure protocols to ensure the data's integrity. Although it is possible to input additional transactions into a branch's accounts (eg. by way of say a transaction correction), a SPMR will always have visibility of these extra transactions as they are shown separately in the branch's accounts. A more detailed note will follow on this subject but this won't be ready before the Factfile needs to be submitted".

Kind regards

Andy

Andrew Parsons

Senior Associate

for and on behalf of Bond Dickinson LLP



Direct: GRO
Fax: GRO

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From: Rodric Williams [mailto: GRO

Sent: 09 May 2014 15:35 **To:** Parsons, Andrew **Cc:** Angela Van-Den-Bogerd

Subject: RE: Strictly Private & Confidential - Subject to Privilege [BD-4A.FID20472253]

Andy – pls give me a call.

Thanks, Rodric

Rodric Williams I Litigation Lawyer

148 Old Street, LONDON, EC1V 9HQ

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From: Parsons, Andrew [mailto: GRO GRO

Sent: 09 May 2014 14:31 **To:** Rodric Williams **Cc:** Angela Van-Den-Bogerd

Subject: RE: Strictly Private & Confidential - Subject to Privilege [BD-4A.FID20472253]

Rodric

Have you had a chance to look at the attached note? SS are now pushing for this answer so that they can build it into the factfile so we need an answer asap.

The question posed by SS is:

∀ As requested at the WG meeting Post Office are asked to produce a formal certification that it is not possible for anyone to access Horizon/HOL and amend transaction data without the knowledge of the Subpostmaster or their staff.

I wonder if, as a holding response, we could say:

"It is not clear what is meant by "formal certification" but enquiries have been made of senior personnel at Fujitsu and in Post Office's IT team. There is no functionality in the Horizon system (through either a front-end terminal or backend server) to edit or delete transaction data once it has been transmitted from a branch to the central branch data centre. The transmission of this data is encrypted, transferred to the branch data centre and then stored in a separate audit server where they are sealed using industry standard secure protocols to ensure the data's integrity. Although it is possible to input additional transactions into a branch's accounts (eg. by way of say a transaction correction) but a SPMR will always have visibility of these extra transactions as they are shown separately in the branch's accounts. A more detailed note will follow on this subject but this won't be ready before the Factfile needs to be submitted". Kind regards

Andy

Andrew Parsons

Senior Associate

for and on behalf of Bond Dickinson LLP

Bond Dickinson

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Mobile GRO

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From: Parsons, Andrew Sent: 22 April 2014 15:42 To: Rodric Williams

Subject: RE: Strictly Private & Confidential - Subject to Privilege [BD-4A.FID20472253]

Rodric

First draft of the note attached – thoughts?

I've intentionally not referred to the "Winn/Lusher" email as it distracts from what is otherwise a very clear picture. I suggest that you, me and FJ get the attached doc near to final form before we escalate to Angela, Chris and Belinda for approval. It is probably then best that this document is sent by Angela to SS.

My hope is that this will hopefully put this matter to bed with SS and we will not need to escalate to the WG. However, we'll not know that answer until we see the SS thematic report.

Α

Andrew Parsons

Senior Associate

for and on behalf of Bond Dickinson LLP

Rond Dickinson Direct: GRO Mobile: Fax: GRO Follow Bond Dickinson: www.bonddickinson.com From: Rodric Williams [mailto: **GRO** Sent: 22 April 2014 12:28 To: Parsons, Andrew Subject: RE: Strictly Private & Confidential - Subject to Privilege [BD-4A.FID20472253] Sounds good – thanks. Do we cc Tony/Working Group? Rodric Williams I Litigation Lawyer 148 Old Street, LONDON, EC1V 9HQ GRO Postline: **GRO** 0 (0) (@) Post Office stories @postofficenews (8) From: Parsons, Andrew [mailto: **GRO** Sent: 22 April 2014 12:27 To: Rodric Williams Subject: RE: Strictly Private & Confidential - Subject to Privilege [BD-4A.FID20472253] I suggest that I draft this information into a formal response to go from POL to SS - do you agree? Kind regards Andy **Andrew Parsons** Senior Associate for and on behalf of Bond Dickinson LLP Direct: **GRO** Mobile: Fax: GRO Follow Bond Dickinson:

GRO

From: Rodric Williams [mailto: Sent: 22 April 2014 12:04

www.bonddickinson.com

To: Parsons, Andrew

Subject: FW: Strictly Private & Confidential - Subject to Privilege

Andy - please see FJ response to the questions we put to them on the "Andy Winn/Alan Lusher email".

Where does this take us? Kind regards, Rodric

Rodric Williams I Litigation Lawyer

148 Old Street, LONDON, EC1V 9HQ

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GRO

From: Davidson James [mailto:

Sent: 17 April 2014 16:27
To: Rodric Williams

Cc: Harvey Michael; Newsome Pete

Subject: RE: Strictly Private & Confidential - Subject to Privilege

Rodric,

Please see Fujitsu's response below.

Summary:

- ∀ There is no ability to delete or change records a branch creates in either old Horizon or Horizon online.

 Transactions in both systems are created in a secure and auditable way to assure integrity, and have either a checksum (Old Horizon) or a digital signature (Horizon Online), are time stamped, have a unique sequential number and are securely stored via the core audit process in the audit vault
- ∀ Whilst a facility exists to 'inject' additional transactions in the event of a system error, these transactions would have a signature that is unique, sub-postmaster id's are not used and the audit log would house a record of these. As above, this does not delete or amend original transactions but creates a new and additional transactions
- ∀ This facility is built into the system to enable corrections to be made if a system error / bug is identified and the master database needs updating as a result, this is not a unique feature of Horizon
- ∀ Approvals to 'inject' new transactions are governed by the change process, 2 factor authentications and a 'four eyes' process. A unique identifier is created and can be audited for this type of transaction within HNGX, Horizon would require more extensive work to investigate as explained below.
 - 1. Can Post Office change branch transaction data without a subpostmaster being aware of the change? No
 - 2. Can Fujitsu change branch transaction data without a subpostmaster being aware of the change? Once created, branch transaction data cannot be changed, only additional data can be inserted. If this is required, the additional transactions would be visible on the trading statements but would not require acknowledgement / approval by a sub-postmaster, the approval is given by Post Office via the change process. In response to a previous query Fujitsu checked last year when this was done on Horizon Online and we found only one occurrence in March 2010 which was early in the pilot for Horizon Online and was covered

by an appropriate change request from Post Office and an auditable log. For Old Horizon, a detailed examination of archived data would have to be undertaken to look into this across the lifetime of use. This would be a significant and complex exercise to undertake and discussed previously with Post Office but discounted as too costly and impractical.

3. If not, where is the evidence for this conclusion? See Answer 2

4. If so:

- a) How does this happen? See above
- b) Why was this functionality built into the system design? To allow for data to be corrected if there were any defects found in the system
- c) Why would Fujitsu need to use this functionality? As above and under instructions from Post Office Ltd.
- d) What controls are in place to prevent the unauthorised use of this method of access? This is achieved through a number of industry standard controls (RBAC, 2 factor authentication etc) which are robustly audited under ISO 27001 / IAS 3402, Link, PCI.
- e) When has branch data been accessed in this way in the past? See above
- 5. In relation to the Winn/Lusher email:
 - a) What is "message store"? This is the repository (or database) where all transactions were written to in the old Horizon system
 - b) Can this be used to access and change branch records? It can be used to access the records. Data cannot be changed, but new data could be inserted into it. Any such inserted data would be tightly controlled by operational processes explained above.
 - c) What is the "impact" of this change on branch records? The impact would depend on exactly what records were inserted.
 - d) Would the subpostmaster be aware of this change? Yes, via the trading statement but spm's are not required to approve the change, this is provided by Post Office.
 - e) Why would this method of access be used? To correct errors if a software defect is identified.
 - f) What controls are in place to prevent misuse of this method of access? As above.

Regards,

James Davidson

Post Office

Fuiitsu

Lovelace Road, Bracknell, RG12 8SN

Mob: Email

Web: http://uk.fujitsu.com









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From: Rodric Williams [mailto: **GRO**

Sent: 17 April 2014 15:25 To: Davidson James

Subject: RE: Strictly Private & Confidential - Subject to Privilege

Thanks James.

Rodric Williams I Litigation Lawyer

148 Old Street, LONDON, EC1V 9HQ (4)

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From: Davidson James [mailto: **GRO**

Sent: 17 April 2014 14:02

To: Rodric Williams

Subject: RE: Strictly Private & Confidential - Subject to Privilege

Rodric,

Just to update, I have a response in draft following a review the technical guys. I have passed this to legal for review and expect this back this pm. Will advise as soon as I have the go ahead to release.

Regards,

James Davidson

Post Office

Fujitsu

Lovelace Road, Bracknell, RG12 8SN

Mob: GRO Email

Web: http://uk.fujitsu.com









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Please consider the environment - do you really need to print this email?

GRO From: Rodric Williams [mailto:

Sent: 14 April 2014 15:59 To: Davidson James

Subject: Strictly Private & Confidential - Subject to Privilege

James,

Could Fujitsu please answer the questions below so that we can respond to a specific challenge put to us by Second Sight in connection with a Mediation Scheme complaint, namely that:

"the Andy Winn/Alan Lusher email in the case of Ward [...] explicitly states that Fujitsu can remotely change the figures in the branches without the SPMs' knowledge or authority".

The Winn/Lusher email is attached. The part of the email in question is:

"Fujitsu have the ability to impact branch records via the message store but have extremely rigorous procedures in place to prevent adjustments being made without prior authorisation - within POL and Fujitsu these controls form the core of our court defence if we get to that stage."

Questions:

- 6. Can Post Office change branch transaction data without a subpostmaster being aware of the change?
- 7. Can Fujitsu change branch transaction data without a subpostmaster being aware of the change?
- 8. If not, where is the evidence for this conclusion?
- 9. If so:
 - a) How does this happen?
 - b) Why was this functionality built into the system design?
 - c) Why would Fujitsu need to use this functionality?
 - d) What controls are in place to prevent the unauthorised use of this method of access?
 - e) When has branch data been accessed in this way in the past?
- 10. In relation to the Winn/Lusher email:
 - a) What is "message store"?
 - b) Can this be used to access and change branch records?
 - c) What is the "impact" of this change on branch records?
 - d) Would the subpostmaster be aware of this change?
 - e) Why would this method of access be used?
 - f) What controls are in place to prevent misuse of this method of access?

Please let me know if it would be easier to address these in a phone call in the first instance.

Kind regards, Rodric

Rodric Williams I Litigation Lawyer



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