

Filed on behalf of the: Defendant  
Witness: Andy Dunks  
Statement No.: First  
Date Made: 16 November 2018

**Claim No: HQ16X01238, HQ17X02637 & HQ17X04248**

**THE POST OFFICE GROUP LITIGATION  
IN THE HIGH COURT OF JUSTICE  
QUEEN'S BENCH DIVISION  
ROYAL COURTS OF JUSTICE**

**B E T W E E N:**

**ALAN BATES & OTHERS**

**Claimant**

**AND**

**POST OFFICE LIMITED**

**Defendant**

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**WITNESS STATEMENT OF ANDY DUNKS**

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I, **ANDY DUNKS** of Fujitsu, Lovelace Road, Bracknell, Berkshire, RG12 8SN **WILL SAY**  
as follows:

1. I am an Information Technology Security Analyst at Fujitsu Services Limited. I am authorised to make this statement on behalf of Post Office Limited, the Defendant in these proceedings.
2. The facts set out in this statement are within my own knowledge, or if they are outside my knowledge, I have explained the source of my information or belief.
3. I have been employed by Fujitsu Services Limited, on the POA (Post Office Account), since 11 March 2002 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 Limited to undertake extractions of audit archived data and to obtain information regarding system transactions recorded on the Horizon system.
4. During 2009/2010 the Horizon system was upgraded to Horizon HNGX and the detail contained in this witness statement refers to audited transaction records generated by this upgraded Horizon HNGX system. Unless I state otherwise in this statement when I subsequently refer to the "Horizon System" I am referring to the Horizon system as upgraded by Horizon HNGX.

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5. When information relating to individual transactions is requested, the data is extracted from the audit archive media of the Horizon System 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 person making the request. Controls have been established that provide assurances to Post Office Internal Audit (POIA) that this integrity is maintained.
6. During audit data extractions the following controls apply :
  - 6.1 Extractions can only be made through the AWs which exist at Fujitsu Services Limited, Lovelace Lane, Bracknell, Berkshire and Fujitsu Services Limited, 14 Cavendish Road Stevenage. These two 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.
  - 6.2 Logical access to the AW and its functionality is managed in accordance with the Fujitsu Services Limited's POA Security Policy and the principles of ISO 27001. This includes dedicated Logins, password control and the use of 2-factor access control.
  - 6.3 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.
  - 6.4 Extractions are only made by authorised individuals.
  - 6.5 The required files are identified and marked using the dedicated audit tools.
  - 6.6 Checksum seals are calculated for audit data files when they are written to audit archive media and re-calculated when the files are retrieved.
  - 6.7 The files are copied to the AW where they are checked and converted into the file type required.
  - 6.8 Digital signatures that were generated at the time that messages were originally sent from the counters to the Data Centre are checked as being correct.
  - 6.9 Checks are made using the JSN that all audited messages for each counter in the Branch have been retrieved and that no messages are missing.

