

**Witness name: Simon Oldnall**

**Statement No: WITN03680400**

**Dated: 9 October 2024**

**POST OFFICE HORIZON IT INQUIRY**

---

**FOURTH WITNESS STATEMENT OF SIMON GEOFFREY OLDNALL**

**ON BEHALF OF POST OFFICE LIMITED IN THE POST OFFICE**

**HORIZON IT INQUIRY**

---

I, Simon Oldnall, of 100 Wood Street, London, EC2V 7ER, say as follows:

**INTRODUCTION**

1 I am the Branch Technology Director at Post Office Limited (“**Post Office**”). I have been employed by Post Office since September 2020 in this role. This is my fourth witness statement to the Post Office Horizon IT Inquiry (“**the Inquiry**”). In my third witness statement to the Inquiry, I outlined my career experience and responsibilities as Branch Technology director [**WITN03680300**]. In particular, I noted that, in my role as Branch Technology Director, I am responsible for working with third party suppliers involved in the Horizon IT system and other related branch technologies (“**Horizon**”). This includes Fujitsu Services Ltd (“**Fujitsu**”). In particular I am responsible for managing the contractual relationship between Post Office and Fujitsu.

- 2 The facts in this witness statement are true, complete and accurate to the best of my knowledge and belief. Where my knowledge and belief, as set out in this witness statement, has been informed by another person or by documents, I acknowledge that it has been informed in that manner. I have been assisted in preparing this witness statement by Burges Salmon and Fieldfisher ("**BSFf**"). BSFf is assisting Post Office in the Inquiry.
- 3 This witness statement has been prepared in response to a request by email from the Inquiry, dated 4 October 2024, that Post Office provide the Inquiry with a statement from an appropriate individual to speak to the contents of a letter from BSFf sent on behalf of Post Office and dated 1 October 2024 regarding the process for and cost of making ARQ requests to Fujitsu. That letter is [**POL00460623**] (the "**Letter**").
- 4 As outlined in [**POL00460623**] at paragraph [1.1] and [1.2], I understand that the request from the Inquiry relates to Rule 9 (58) question 30(b), which was addressed in the first witness statement of my colleague Melanie Park (Central Operations Director) ("**Ms Park**") [**WITN11600100**] from paragraph 160 to 163 and, in particular, paragraph 162.
- 5 Further, I understand that the Inquiry had asked for the current cost of an ARQ data request for a 1-month period (in a letter dated 19 August 2024 responding to the draft first witness statement of Ms Park). I understand that my colleague Ms Park explained that her department has never had a budget allocated for ARQ requests and that it makes the ARQ requests to the Security Team.

- 6 In my role as Branch Technology Director, I am responsible for managing Post Office's contractual relationship with Fujitsu. As part of that contractual relationship, Post Office is entitled to make ARQ requests. I am not involved in the day-to-day practicalities of making individual ARQ requests to Fujitsu (the process is managed by the Network Crime and Risk Support Team ("**NCRST**"), formerly the Security Team), however, when the NCRST makes ARQ requests to Fujitsu they are exercising Post Office's rights under the contractual relationship with Fujitsu that I (and my team) manage. If required I may have input into the processing of an individual ARQ request (typically if questions arise from the NCRST) and if significant issues arise with the ARQ request process, or broader decisions need to be made regarding that process, I am involved in managing the discussions with Fujitsu. An example of this is the decision by Fujitsu to reimburse Post Office for previous ARQ request costs (as outline below at paragraph 10(a)).
- 7 For those reasons, I assisted BSFf by providing information required for the Letter which outlines the ARQ request process and the cost of an ARQ request for a 1-month period [**POL00460623**]. I also reviewed the Letter before it was sent and was satisfied that it was accurate. To the extent that colleagues who work on this process on a day-to-day basis were better placed to assist BSFf by providing the content required for the Letter, they have done so but I confirm that the Letter represents my understanding of the ARQ request process at Post Office to the best of my knowledge and belief. In accordance with the request from the Inquiry for a statement from

an appropriate individual to speak to the content of the letter, I set out the contents of the Letter in this statement.

8 In particular, in relation to the current process for making an ARQ request:

- (a) To make an ARQ request, currently, a requestor must complete an ARQ form and send it to the NCRST (the template ARQ form has been produced to the Inquiry as **[POL00448281]**).
- (b) A member of the NCRST checks that all boxes on the form have been filled out and submits completed ARQ forms to Fujitsu via email to process. Fujitsu will securely send the output data to the NCRST and the NCRST then transfers the data securely onwards to the requestor.
- (c) Fujitsu's typical response time for an ARQ request is 2-6 weeks. However, there is a fast-track process for requests from the Remediation Unit, pursuant to which responses are provided within two weeks.
- (d) As I explained in paragraph 84 of my third witness statement **[WITN03680300]**, Post Office is currently updating and amending this process.

9 Further, in relation to the cost of making an ARQ request:

- (a) Post Office's contract with Fujitsu provides for Post Office to make 720 ARQ requests on a rolling annual basis for no additional cost above the base contract cost. Post Office is only additionally invoiced for requests above that level.

- (b) Post Office typically uses and exceeds the full annual allowance of requests for ARQ data. The cost of any ARQ request additional to the abovementioned annual allowance is £225 (it is a flat fee and does not vary depending on the period for which data is requested). Accordingly, the current cost of an ARQ data request for a 1-month period is £225.
- (c) Fujitsu invoices Post Office for additional ARQ requests beyond the current allowance under the contract and those costs are met by the cost centre for the Horizon Shortfall Scheme within Post Office's Remediation Unit (the additional demand is driven largely by the Horizon Shortfall Scheme as in order to assess claims Post Office often requires access to data dating back further than the previous 12 months).

10 For completeness I also note that:

- (a) Fujitsu recently provided a rebate to Post Office for all additional ARQ requests made between July 2020 and December 2023 in recognition of those requests having been made to support Post Office in resolving queries from Postmasters and, going forward, Fujitsu has told Post Office it will not charge Post Office for any additional ARQ requests that relate to the Horizon Shortfall Scheme.
- (b) It is not necessary for Post Office to make ARQ requests for data that is 12 months old, or less. I refer to paragraph 161 of the first witness statement of Ms Park **[WITN11600100]**.

11 I exhibit the Letter with my statement [POL00460623] and I am able to speak to the contents of the Letter and this statement should the Inquiry require further information.

**Statement of Truth**

I believe the contents of this witness statement to be true

Signed: 

Dated: 09 October 2024

**Index to Fourth Witness Statement of Simon Oldnall**

<b>Exhibit No.</b>	<b>URN</b>	<b>Document Description</b>	<b>Control No.</b>
1.	POL00460623	Letter from Post Office to the Inquiry re ARQ requests (1 October 2024).	POL-BSFF-150-0000001
2.	POL00448281	ARQ form 2024	POL-BSFF-104-0000240