

Witness Name: Donna Maria Munro

Statement No.: WITN06850100

Dated: 29 December 2023

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF DONNA MARIA MUNRO

I, *MS DONNA MARIA MUNRO*, will say as follows:

Introduction

1. I am a former employee of Fujitsu Services Limited ("**Fujitsu**"), having left the business in 2015.
2. This witness statement is made to assist the Post Office Horizon IT Inquiry (the "**Inquiry**") with the matters set out in the Rule 9 Request provided to me on 29 November 2023 (the "**Request**"), to the extent I have or had direct knowledge of such matters. My long-term and short-term recollection has been affected by recent medical issues, and I have very limited recollection of the events covered in the Request. For this reason, the content of my witness statement largely focusses on the documents provided to me by the Inquiry. Where I have referred to documents which have assisted my response, the URNs of the relevant documents are set out in this statement.
3. I was assisted in preparing this statement by Morrison Foerster, who represent Fujitsu in the Inquiry.

Professional Background

4. Prior to joining Fujitsu, I worked for a technology company processing orders, providing customer support and performing general administrative tasks.
5. I believe I joined Fujitsu in or around 2001 as a Systems Management Centre ("**SMC**") Technician in the Royal Mail Group Account team ("**RMG Account**"). However, I have been shown a Powerhelp call log which I opened on 15 December 2000, which suggests I must have started my role at Fujitsu in at least December 2000 ([**FUJ00144084**]). The SMC conducts Fujitsu's internal monitoring of the Horizon system and operates 24 hours a day, every day.
6. My recollection of what this role involved is very limited due to the reasons set out above. I recall that I was part of the team that was responsible for monitoring the rollout of the Horizon system through management of calls from Post Office branches in relation to the remote upgrades deployed to Horizon counters. This involved ensuring that Horizon counters within specific offices were deployed or rolled back on time. If an issue arose, I would refer to the known error log ("**KEL**") and/or engage the Software Support Centre ("**SSC**") and/or Management Systems Support ("**MSS**") to resolve the issue. As part of the SMC, I was also responsible for monitoring alerts of the Tivoli system for error messages produced by branch counters and back-end systems.
7. I did not receive formal training for this role, however on-the-job training was delivered by experienced senior team members. Due to the passage of time, I cannot recall the names of these individuals, but I do recall that Horizon system

architects Ian Bowen and Glen Stephens would also assist with the team's technical knowledge and understanding of the solutions used for raised issues.

8. I progressed to SMC Team Leader, responsible for management and workload distribution of six individuals in the team. I cannot recall specifically when I progressed to this role, but I think it is likely to have been at least one year after I joined Fujitsu. In 2005, I left the RMG Account team to support different projects across the Fujitsu business.
9. In or around June 2009 I was offered the role of Security Operations Manager in Fujitsu's Post Office Account team (the "**PO Account**"). This was a start-up role in the team which I believe I was offered given my experience in differing roles within Fujitsu. I did not have much experience within Security at the start of my role, and I raised this with the PO Account Manager, Peter Thompson. He and the Chief Information Security Officer ("**CISO**") offered support throughout my role. The role of CISO was held by various individuals across my time on the PO Account, including Tom Lillywhite, Howard Pritchard and Brad Warren.
10. On joining the PO Account, my main focus was on gaining an understanding of how the teams worked. I reviewed a number of the services provided by the Security team, including access control (implementing a joiner leavers movers process), Security clearances, patch management/monitoring, antivirus updates, and reconciliation services (the "**Reconciliation Service**"). I reviewed the documentation in place for each of these services and where appropriate produced work instructions for each process, including how and why each task was performed. The purpose of such work instructions was to ensure that any team member, after initial in-house training, could follow the instructions to complete the

task. An index of these documents was kept. [FUJ00088799] is an example of a work instruction I prepared for the User Access Process and documents how the Security team gained access to physical and technical assets within the PO Account.

11. The Inquiry has referred me to document [FUJ00230968] which includes an email from myself to Penny Thomas, Andy Dunks and Rajbinder Bains on 9 February 2011, requesting they each populate a Security Operations document index with the processes for which they were responsible. This is an example of how I performed the role described at paragraph 10 above.

12. The Security team also offered litigation and/or fraud support services (the "**Litigation Support Service**") to Post Office Limited ("**POL**"). Documentation for the Litigation Support Service was established prior to my joining the PO Account. The Inquiry has referred me to documents [FUJ00152221] and [FUJ00152225], which are examples of this documentation, which was produced, well-maintained and updated appropriately by Penny Thomas, the Subject Matter Expert ("**SME**"). I made no amendments to these documents during my time working on the PO Account.

13. I was also responsible for management of the Security team, including sickness, leave and performance monitoring, and workload distributions.

14. In my day-to-day work I reported directly to Peter Thompson in relation to PO Account services and there was an open line of communication between us. I would report my daily activities, changes I planned to implement, and any team issues. I also maintained a working relationship with the CISO and would reach out

to him for questions relating to more technical/security matters of the work carried out by the Security team.

15. From 2012, my focus moved to supporting the Payment Card Industry Data Security Standards (“**PCI DSS**”) compliance programme, though I still maintained an oversight of the Security team. Initially, I supported Bill Membery (Quality and Compliance Manager, PO Account) in the assessment of the programme, and later I took on responsibility of the PCI DSS work, working alongside the support teams, the PCI Qualified Security Assessor and POL’s representative, Connie Penn, to understand the programme’s compliance requirements. I organised interviews with each of the aforementioned teams to evidence that the compliance requirements of the PCI DSS programme had been met.

16. I left Fujitsu in 2015 to take up a role as a PCI DSS consultant within another company. Since then, I have completed several PCI DSS qualifications and attained the ISO 27001 Lead Auditor certification.

Other Fujitsu employees

17. In my role as Security Operations Manager, I was line manager to the SME responsible for the management and carrying out of the extraction of audit data (“**ARQ data**”). When I joined the PO Account team, Penny Thomas held this role, supported by Andy Dunks. Rajbinder Bains joined the team a few months later.

18. As SME, Penny Thomas was responsible for the provision of the Litigation Support Service and supported the Reconciliation Service. She was supported by the SSC (including Anne Chambers) and Gareth Jenkins as and when required.

19. In the day-to-day performance of her role, Penny Thomas reported to the PO Account Manager and the CISO, rather than to me. As her line manager, I was copied into some of Penny Thomas' email correspondence so that I could understand and manage the resourcing levels and capacity of the team. Penny Thomas also liaised directly with POL in the performance of her role as their direct point of contact for the Litigation Support Service. From memory and review of the documentation, Penny Thomas would occasionally copy me into email correspondence with POL so that I had visibility of her capacity. Penny Thomas would only reach out to me for assistance in relation to the Litigation Support Service for things like arranging cover when she was away, as I managed the team workloads. I do not recall Penny Thomas raising concerns relating to the service itself, as these would normally be raised with the PO Account Manager or CISO. I did not offer subject matter support to the Litigation Support Service.

20. Penny Thomas provided training in all areas of the Litigation Support Service and Reconciliation Service, to Rajbinder Bains and Andy Dunks. Penny Thomas also trained in the other areas of the Security services. The aim of training both Rajbinder Bains and Andy Dunks was to ensure that the Litigation Support Service and Reconciliation Service would continue to function even if a member of the team was absent.

21. I believe that Gareth Jenkins was a Senior Solution Architect for the Horizon system. He assisted Penny Thomas in understanding the ARQ data she retrieved as part of the Litigation Support Service and I believe he was, on occasion, called as an expert witness in prosecutions conducted by POL. I did not work with Gareth

Jenkins on a technical basis, and only spoke with him on a rare occasion, briefly saying 'hello' around the office.

22. Anne Chambers worked in the SSC providing third- and fourth-line support to the Horizon system. I recall one occasion where she assisted Penny Thomas with her understanding of ARQ data retrieved as part of the Litigation Support Service, and I assume this will have been a similar type of support to that offered by Gareth Jenkins, though I am uncertain of any further details of this occasion. I did not work with Anne Chambers on a regular basis in relation to Security operations. I began to work with Anne Chambers and the SSC on a more frequent basis when I joined the PCI DSS compliance programme in 2012. This would have been regarding the requirements and controls needed as part of audits.

23. Andy Dunks was the Crypto Key Manager for the team and provided Security Analyst support to Penny Thomas. The Crypto Key Manager was responsible for the renewal of counter encryption keys, a secure process carried out by two Key Custodians and overseen by a third person, who I believe needed to be a team manager or alike. From recollection, on my joining of the Security team there was no clear work instruction in place for this process. Therefore, I worked through the process step-by-step and documented the work instructions. I was a Key Custodian alongside Andy Dunks. In the day-to-day performance of his role, Andy Dunks would report to me.

24. Rajbinder Bains joined the PO Account Security team in 2009 with a focus on access control and anti-virus clearances. She also provided Security Analyst support to Penny Thomas after training as described above. In the day-to-day performance of her role, Rajbinder Bains would report to me.

25. At a high level, I was aware of the process the team carried out to extract ARQ data. The team worked in a secure room to access the audit servers via the audit workstation and would extract the ARQ data requested by POL. If required, the team would produce a corresponding witness statement in respect of how the ARQ data was gathered. The team were responsible for providing the ARQ data and witness statements to POL. If required, they could also be asked to present this evidence at court. I understood that the extraction of ARQ data was a contractual requirement of Fujitsu's relationship with POL.

26. I did not have any role in the extraction of ARQ data, provision of witness statements or the legal proceedings which followed. As mentioned above, Penny Thomas reported directly to the PO Account Manager and CISO in regard to matters of the Litigation Support Service, including in circumstances where issues needed to be escalated. As her line manager, I would be copied for awareness of potential resourcing impacts, as in documents [FUJ00154969] and [FUJ00225720] referred to me by the Inquiry.

Relationship with Post Office Limited (POL)

27. Throughout my role as Security Operations Manager, I attended monthly meetings with the CISO and POL's Senior Security Manager, Dave King, to discuss Security activities. At the monthly meetings, Fujitsu and POL would agree a Security report. Due to the passage of time, I cannot now recall the usual contents of this report, however document [FUJ00231986] appears to be a copy of the April 2011 report delivered to Dave King by the PO Account team. On occasion, POL's Head of Information Security, Sue Lowther, would also attend the meetings, however she would usually meet with the CISO independently.

28. I do not recall any specific discussions regarding the Horizon system's integrity with POL at the monthly Security meetings.

29. In the Request, the Inquiry asked that I consider [FUJ00225729]. It appears that Peter Thompson received an urgent ARQ request from POL on 1 October 2010, which originated with Paula Vennells. This was forwarded to me for information, and Penny Thomas actioned and responded to the request. I do not recall the matters discussed in this email chain, and I had no relationship with either Paula Vennells or Helen Rose. I assume communication with Paula Vennells would be via the CISO or PO Account Manager, though I do not know what kind of issues would be discussed. I do not recall there being a line of communication between anyone below the PO Account Manager or CISO level and Paula Vennells.

Audit data from Horizon

30. There was a contractual requirement for Fujitsu to retrieve different types of audit data from the Horizon system to support POL, including ARQ data, banking records and Help Desk call logs. This was provided through the Litigation Support Service.

31. There were agreed limits on the number of requests and days per requests which could be made per annum. POL could request additional data over these thresholds and, at that point, a Change Proposal would be raised and costed to provide the additional data. The Inquiry has referred me to documents [FUJ00229537], [FUJ00231940], [FUJ00231939], [FUJ00231959], [FUJ00229495] and [FUJ00156632] which have aided my recollection of the process undertaken by the PO Account to provide additional data to POL. In most cases, POL would make requests for additional data to Penny Thomas or the supporting team (Rajbinder Bains and Andy Dunks), and they would have raised

the Change Proposal with me listed as the 'owner' as their line manager. I was not responsible for the drafting of the Change Proposal or the calculation of the cost of additional ARQ data. Penny Thomas would provide costings for the provision of additional ARQ data and raise the relevant change paperwork, with the support of Change Manager Ken Westfield. Costs would be calculated by reference to an agreed spreadsheet of man-days and daily rates, which was held by Ken Westfield. I believe that additional costings were always based off of this spreadsheet. Penny Thomas would then communicate the rates and additional costings to POL.

32. As mentioned above, my role was focussed on managing the team in terms of workload and team welfare. I was not directly involved in the extraction, retrieval or provision of ARQ data to POL.

Issues with ARQ data

Duplicate Transactions issue

33. The Inquiry has referred me to documents [FUJ00097033], [FUJ00097035], [FUJ00097036], [FUJ00097042], [FUJ00097046], [FUJ00097047], [FUJ00097052], [FUJ00097053], [FUJ00097054], [FUJ00097055], [FUJ00097056], [FUJ00097057], [FUJ00097058], [FUJ00097059], [FUJ00097060], [FUJ00097062], [FUJ00121097], [FUJ00122903], [FUJ00122904], [FUJ00122961], [FUJ00122958], [FUJ00154902], [FUJ00154905], [FUJ00154918], [FUJ00155517], [FUJ00172046], [FUJ00097037], [FUJ00156217], [FUJ00225752], [FUJ00225785] and [FUJ00228770] in relation to an issue identified with audit data. I do not recall this event from memory and therefore my recollection has been supported by my review of these documents.

34. I recall being made aware of the issue by Penny Thomas but, until reviewing the documents referred to me by the Inquiry, I could not recall any details of the issue or how it was resolved. From my review of the provided documents, the issue was identified in June 2010 whereby duplicate transaction records were being shown on the retrieval of records (the “**Duplicate Transactions issue**”). I would have been first notified of the issue on 23 June 2010 when Penny Thomas shared an initial report of the problem with me via email ([FUJ00097058] and [FUJ00097055]).

35. Penny Thomas appears to have raised the Duplicate Transactions issue with the relevant teams within Fujitsu, such as the SSC, for investigation and provided the senior management team, including Tom Lillywhite, Peter Thompson, Guy Wilkerson and Geoff Butts, with full and regular updates on the matter (this is shown in [FUJ00097035], for example). I was not involved in any discussions regarding resolution or communication of the issue to POL. Once Penny Thomas had notified POL of the Duplicate Transactions issue, she shared notes of a call she attended with POL with Tom Lillywhite, Peter Thompson, Graham Welsh and me ([FUJ00121097] and [FUJ00154902]).

36. I was not directly involved in managing the Duplicate Transactions issue, but I would have been copied into some emails by Penny Thomas for visibility of what she was working on (such as [FUJ00154902] and [FUJ00097033]).

37. I can see from the email trail that a software release was issued to fix the Duplicate Transactions issue ([FUJ00154918]).

38. I cannot recall any other raised issues which may have impacted the integrity of ARQ data.

Retrieval of Historic ARQ Data / Second Sight

39. In the Request, the Inquiry has referred me to documents [FUJ00225316], [FUJ00225329], [FUJ00226141], [FUJ00232061].

40. I have very limited recollection of investigations into historic cases concerning the integrity and reliability of Horizon data referenced in the above documents.

41. After consideration of [FUJ00225316], I can recall assisting Pete Newsome with raising the Change Proposal. I believe he had received a request from POL to retrieve historical Help Desk calls and I helped him to produce the Change Proposal with the assistance of Ken Westfield, as per the process described above at paragraph 31.


42. I have no further recollection of Fujitsu and/or POL's relationship with Second Sight and am only aware of the mention of Second Sight work as it is referred to in document [FUJ00225329].

General

43. Unfortunately, I cannot recall anything further on the matters outlined in the Request or other matters relevant to the Inquiry's Terms of Reference. There are no other matters that I would like to bring to the attention of the Chair of the Inquiry.

Statement of Truth

I believe the content of this statement to be true.

 **GRO**

Dated: 29.12.2013

**INDEX TO THE FIRST WITNESS STATEMENT OF
MS DONNA MARIA MUNRO**

No.	Document Description	Control No.	URN
1	PowerHelp Call Log E-0012151527- Caller: PM Unknown- advising PM of upgrade on Monday night 18/12/00	POINQ0150278F	FUJ00144084
2	Fujitsu/Post Office®Post Office Account User Access Procedure (v4.0)	POINQ0094970F	FUJ00088799
3	Email from Penny Thomas to Donna Munro cc Andy Dunks, Rajbinder Bains RE: Documentation	POINQ0237122F	FUJ00230968
4	Audit Data Extraction Process - v1.1	POINQ0158415F	FUJ00152221
5	Management of the Litigation Support Service - v2.0	POINQ0158419F	FUJ00152225
6	Email from Penny Thomas to Peter Thompson, Jean-Phillippe Prenovost, cc: others RE FW MR Humphrey - POL Prosecution support	POINQ0161164F	FUJ00154969
7	Email chain from Penny Thomas to Andy Dunks and cc'd Donna Munro - Re: Kirkoswald - ARQ P048 - P058	POINQ0231837F	FUJ00225720
8	RMG Security Ops Service Management Report - Monthly Review - April 2011	POINQ0238140F	FUJ00231986
9	Email chain from Penny Thomas to Cheryl Card, Mark Wright John Simpkins and others - Re: FW: URGENT - ARQ request - Ferndown 282508	POINQ0231846F	FUJ00225729
10	Email from Penny Thomas to Steve Parker RE: ROM2336: New Change Request - CRO2446 - ROM - Fearndale Road - ARQ	POINQ0235691F	FUJ00229537

11	HNG-X Change Proposal - HNG-X CP0xxx - Change to Current Supply of ARQ Thresholds	POINQ0238094F	FUJ00231940
12	Email from Ken Westfield to Donna Munro and Penny Thomas re Draft CP for ARQ RWP from POL - Change to security quotas in ARQ	POINQ0238093F	FUJ00231939
13	Fujitsu - HNG-X Change Proposal - HNG-X CP0625 - Change to Current Supply of ARQ Thresholds by Penny Thomas - V 1.0	POINQ0238113F	FUJ00231959
14	Fujitsu - HNG-X CHANGE PROPOSAL - POL Request for Expert Analysis of Transaction Records for Oaktree Post Office - ORIGINATOR: Penny Thomas - Ref: PGM/CHM/TEM/0001 - V1.0	POINQ0235649F	FUJ00229495
15	Email from Ken Westfield to Penny Thomas, Torstein Godeseth RE ROM2446: New Change Request - CRO2446 ROM Fearndale Road ARQ	POINQ0162826F	FUJ00156632
16	Email correspondence between Penny Thomas and other regarding duplication of transaction records	POINQ0103204F	FUJ00097033
17	Email chain on duplication of ARQ data between Penny Thomas and Gareth Jenkins	POINQ0103206F	FUJ00097035
18	Email chain between Penny Thomas (Fujitsu), Pat Lywood (Fujitsu), Graham Welsh, and others, re: PC0200468 - Duplication of Transaction Records	POINQ0103207F	FUJ00097036
19	Email chain from Gareth Jenkins to Graham Allen, Alan Holmes, Andrew Mansfield and other re: PC0200468 - Duplication of Transaction Records with attachment	POINQ0103213F	FUJ00097042
20	Emails between Guy Wilkerson, Geoff Butts & Alan D'Alvarez re duplication of transaction records	POINQ0103217F	FUJ00097046

21	Email chain between Penny Thomas, Guy Wilkerson , Geoff Butts and others RE: Duplication of Transaction Records on ARQ Returns	POINQ0103218F	FUJ00097047
22	Email from Butts Geoff to David Cooke RE: FW: ARQs	POINQ0103223F	FUJ00097052
23	Email chain between Graham Welsh, Penny Thomas and others	POINQ0103224F	FUJ00097053
24	Email chain from Gareth Jenkins to Penny Thomas and Guy Wilkerson, RE: "Duplication of Transaction Records on ARQ Returns."	POINQ0103225F	FUJ00097054
25	Email chain between Penny Thomas, Graham Welsh, Gaetan Achte and others RE: FW: Duplication of Transaction Records on ARQ Returns	POINQ0103226F	FUJ00097055
26	Email chain between Penny Thomas, Guy Wilkerson, Graham Welsh and others; RE: Duplication of Transaction Records on ARQ Returns	POINQ0103227F	FUJ00097056
27	Email from Penny Thomas to Guy Wilkerson RE: FW: Duplication of Transaction Records on ARQ Returns	POINQ0103228F	FUJ00097057
28	Report called "Duplication of transaction Records contained in ARQ returns - 22 June 2010 by Penny Thomas	POINQ0103229F	FUJ00097058
29	Email chain between Penny Thomas, Guy Wilkerson, Gareth Jenkins RE: Duplication of Transaction Records on ARQ Returns	POINQ0103230F	FUJ00097059
30	Email chain between Geoff Butts, Guy Wilkerson, Penny Thomas and others RE: Duplication of Transaction Records on ARQ Returns	POINQ0103231F	FUJ00097060
31	Email chain between Geoff Butts, Guy Wilkerson, Penny Thomas and	POINQ0103233F	FUJ00097062

	others RE: Duplication of Transaction Records on ARQ Returns and informing POL of issues		
32	Emails between Penny Thomas, Tom Lillywhite, Peter Thompson, Graham Welsh, Donna Munro and Gareth Jenkins regarding ARQ returns containing duplicated records, including a request not to share information with POL.	POINQ0127290F	FUJ00121097
33	Email from Penny Thomas to Tom Lillywhite, Gareth Jenkins and Guy Wilkerson re: FW: Duplication of Transaction Records in ARQ Returns.	POINQ0129117F	FUJ00122903
34	Standard form Fujitsu draft witness statement Version 9.0 (0209) CS011A with mark-up and comments by Penny Thomas	POINQ0129118F	FUJ00122904
35	Email from Penny Thomas to Andy Dunks, Donna Munro, Jane M Owen and others re: FW: Regina v Wendy Buffrey	POINQ0129175F	FUJ00122961
36	Draft witness statement for Andrew Paul Dunks	POINQ0129172F	FUJ00122958
37	Seema Misra case study: Email trail from Penny Thomas to Tom Lillywhite, Peter Thompson, Graham Welsh and Donna Munro re: FW: Action Points - Duplicated Records	POINQ0161097F	FUJ00154902
38	Seema Misra case study: Email trail from Penny Thomas to Jean-Philippe Prenovost, and Tom Lillywhite cc: Graham Welsh, Gareth Jenkins, Donna Munro et al re: FW: Duplication of Transaction Records in ARQ Returns	POINQ0161100F	FUJ00154905
39	Email chain from Penny Thomas to Tom Lillywhite and Donna Munro re: FW: Duplication of Transaction Records in ARQ Returns	POINQ0161113F	FUJ00154918

40	Email from Penny Thomas to Andy Dunks, Rajbinder Bains and Donna Munro re FW: Matter Arising from ARG194/1011 regarding technical issues at Derby outlet	POINQ0161711F	FUJ00155517
41	Email chain from Gerald Barnes to Penny Thomas, RE: FW: PC0200468 - Duplication of Transaction Records	POINQ0178227F	FUJ00172046
42	Email chain between Guy Wilkerson, Penny Thomas, Gareth Jenkins and others RE: Duplication of Transaction Records on ARQ Returns	POINQ0103208F	FUJ00097037
43	Email from Penny Thomas to Gareth Jenkins re: FW: PEAK 202819 - Sysman3 Events - Service Delivery Issue	POINQ0162411F	FUJ00156217
44	Email from Sarah Selwyn to Steve Parker, Donna Munro and others re "ARQ calls - further to yesterdays rant....."	POINQ0231869F	FUJ00225752
45	Email from Donna Munro to Penny Thomas and Rajbinder Bains re: Expedited Change [Royal Mail Group Account] Note added to 043J0288930	POINQ0231902F	FUJ00225785
46	Email trail from Penny Thomas to Steve Parker and from Sarah Selwyn to Penny Thomas re FW: PC0204310 - Duplicate JSN detected	POINQ0234924F	FUJ00228770
47	CT Title: Retrieval of Historical Horizon data. CP NO; 5408 (0851). POL Ref: CRO2580. Raised by Simon Baker (POL) to Donna Munro (Fuj)	POINQ0231433F	FUJ00225316
48	Email chain from Penny Thomas to Pete Newsome cc: Donna Munro RE: Horizon data	POINQ0231446F	FUJ00225329
49	Email from James Davidson to Pete Newsome cc Donna Munro, Matthew Church Re: Request for ARQ Extract	POINQ0232258F	FUJ00226141

50	Email from Donna Munro to Pete Newsome, James Davidson and Ken Westfield re: Retrieval of Historical data	POINQ0238215F	FUJ00232061
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