

1 Wednesday, 13 December 2023

2 (10.00 am)

3 **MS PRICE:** Good morning, sir. Can you see and hear
4 us?

5 **SIR WYN WILLIAMS:** Yes, I can, thank you.

6 **MS PRICE:** Sir, may we please call Mr Knight.

7 **Announcement re Evidence of MARTIN SMITH**

8 **SIR WYN WILLIAMS:** Just before you do that, I need
9 to make a public announcement. Yesterday
10 I caused the Inquiry Team to notify Mr Smith,
11 who was due to give evidence tomorrow, and Core
12 Participants, that it would not be possible for
13 Mr Smith to give his evidence on account of
14 there being significant disclosure of documents
15 over the last number of days, which were
16 relevant to his evidence.

17 I want to stress publicly that the members
18 of the Inquiry Team are working extremely hard
19 to ensure that, when they are faced with late
20 disclosure, they assess the relevance of the
21 documents in the hope that a witness to whom the
22 documents relate will be able to give evidence
23 as scheduled. In most instances, happily, that
24 has occurred.

25 However, as everyone now knows, from time to

1

1 confirm your full name, please.

2 **A.** It's Christopher Granville Knight.

3 **Q.** Thank you for coming to the Inquiry to assist it
4 in its work and for providing a statement in
5 advance of today. You should have in front of
6 you a hard copy of that statement. It is dated
7 23 October 2023. Do you have that statement?

8 **A.** I do, yes.

9 **Q.** If you turn to page 41 of that, please --

10 **A.** Yes.

11 **Q.** -- you should have a copy with a visible
12 signature; is that right?

13 **A.** Correct.

14 **Q.** Is that your signature?

15 **A.** It is, yes.

16 **Q.** Are the contents of that statement true to the
17 best of your knowledge and belief?

18 **A.** Yes, they are.

19 **Q.** For the purposes of the transcript the reference
20 for the statement is WITN08290100.

21 Starting, please, Mr Knight, with
22 an overview of your career at the Post Office,
23 you've worked for the Post Office since 1983; is
24 that right?

25 **A.** That's correct.

3

1 time that is not possible and it was not
2 possible in Mr Smith's case to deal with
3 upwards, as I understand it, of 700 documents in
4 the time available between the disclosure of
5 those documents and Mr Smith's evidence
6 tomorrow.

7 As I have said repeatedly, fairness demands
8 that witnesses see relevant documents in good
9 time to digest them and understand them before
10 they give their evidence to the Inquiry.

11 As it happens, no great damage has been
12 caused by this latest episode, save for the loss
13 of one day of the Inquiry's time, because
14 Mr Smith can return at a later stage, as was
15 always anticipated that he would, and so instead
16 of his giving evidence over two days, his
17 evidence will be given over one day at some
18 suitable date in the New Year.

19 Thank you, Ms Price. Over to you.

20 **MS PRICE:** Thank you, sir.

21 **CHRISTOPHER GRANVILLE KNIGHT (sworn)**

22 **Questioned by MS PRICE**

23 **MS PRICE:** Good morning, Mr Knight. My name is Emma
24 Price and, as you know, I will be asking you
25 questions on behalf of the Inquiry. Could you

2

1 **Q.** You remain employed by the Post Office today?

2 **A.** I do, yes.

3 **Q.** In the last 40 years you have held a range of
4 roles including Postal Officer roles, various
5 investigator roles and now a role within the
6 Intelligence Team; is that right?

7 **A.** That's correct.

8 **Q.** You say in your statement that in 1997, you
9 applied and were promoted within the Post Office
10 Investigation Department from a Postal Officer
11 role to an Assistant Investigation Officer; is
12 that right?

13 **A.** That's correct.

14 **Q.** You held this role until the year 2000?

15 **A.** Yes.

16 **Q.** What kind of investigations were you involved in
17 when you held this Assistant Investigation
18 Officer role?

19 **A.** It was working for the Post Office Investigation
20 Department, which was a sort of corporate
21 Investigation Department that sat over the
22 business and, initially, I was in a team, and
23 the first enquiries we did was regarding
24 postage, we used postage stamps, counterfeit
25 stamps, things like that. And then I moved on

4

1 to a team, I think there was six of us and we
 2 looked at losses of Special Delivery items over
 3 the Royal Mail Network, so it sort of covered
 4 the country.

5 **Q.** You say in your statement that, when you were in
 6 this role, the Post Office Investigation
 7 Department underwent a structure change and
 8 changed its name to the Post Office Security and
 9 Investigation Service. How did your role change
 10 when these structural and name changes came in?

11 **A.** There was the name change, that was a major
 12 change, and then I think it was in 2000 there
 13 was options to move into other parts of the
 14 business, and I ended up moving to a newly
 15 formed part of the business called Cash Handling
 16 and Distribution which was an amalgamation of
 17 the Cash Centres and the in-house Cash In
 18 Transit business.

19 **Q.** When you moved into that role, you say you were
 20 a Lead Investigator; is that right?

21 **A.** I think I was the only -- I think there was two
 22 of us who went over, we were the only
 23 Investigators. The previous or the current, as
 24 it were, Security Managers were physical
 25 Security Managers.

5

1 Investigator, or whatever.

2 **Q.** You were doing the job of an Investigator?

3 **A.** Yes, yeah.

4 **Q.** This was a role you held until 2016, when you
 5 moved to your current role in the Intelligence
 6 Team?

7 **A.** That's correct.

8 **Q.** Is it right that in your current role you have
 9 no involvement in internal investigations?

10 **A.** There aren't any. Yes, correct.

11 **Q.** Turning, please, to the training you received as
 12 an Investigator, in 1997 when you first started
 13 as an Assistant Investigator Officer, did you
 14 have any experience of criminal investigations?

15 **A.** No.

16 **Q.** Is it right that you recall attending
 17 a three-week residential training course when
 18 you took up the role?

19 **A.** Yes, I believe it was three weeks.

20 **Q.** You say in your statement at paragraph 5 that
 21 you recall this covering the Police and Criminal
 22 Evidence Act Codes of Practice and the relevant
 23 investigation forms that were used to ensure
 24 adherence to the Police and Criminal Evidence
 25 Act. Do you recall disclosure obligations being

7

1 **Q.** Is it right that your investigations in this
 2 role focused on possible criminal offences,
 3 involving the in-house Cash in Transit Service
 4 and Cash Centre staff?

5 **A.** Yes, that's correct.

6 **Q.** You say the role soon became one of physical
 7 security; is that right?

8 **A.** It became, yeah, dual yeah.

9 **Q.** You stayed in this role until around 2003 --

10 **A.** 2003/2004, I think, yes.

11 **Q.** -- at which point you took up a role as
 12 an Investigator for the Post Office,
 13 investigating possible criminal offences within
 14 the network?

15 **A.** That's correct.

16 **Q.** This related to both directly managed branches,
 17 formally Crown Office branches --

18 **A.** Yes.

19 **Q.** -- and also the Branch Network; is that right?

20 **A.** That's correct.

21 **Q.** Your job title during this period was
 22 Investigation Manager?

23 **A.** Yes, it -- yeah. There was sort of -- I think
 24 it sort of changed but, ultimately, it was the
 25 same job, it was just different types: Fraud

6

1 covered on that initial three-week course?

2 **A.** I can't say that I remember it fully. It was
 3 '97, so I apologise for that. There were --
 4 I think as I've stated, there were disclosure
 5 forms that were part of the sort of plethora of
 6 forms that were used in investigations. So it
 7 would have been covered within that, I believe.

8 **Q.** So you recall being introduced to the forms on
 9 that initial training course?

10 **A.** Yeah, yeah, and the disclosure. Yeah.

11 **Q.** You did some study in 1999 and 2000, as part of
 12 an NVQ level 4 in Investigation but you didn't
 13 end up completing that qualification; is that
 14 right?

15 **A.** Yeah, I started it, I believe, when I was in
 16 POID and my line manager was the assessor or
 17 mentor, or whatever, but when I moved over to
 18 CH -- Cash Handling and Distribution, CH&D,
 19 there wasn't many investigations, so some of --
 20 you had to sort of covering certain aspects of
 21 an investigating role. So it sort of got
 22 prolonged and then I got towards the end and it
 23 never got sort of finalised, but --

24 **Q.** You then had some Cash Handling and
 25 Distribution-specific training in the year 2000;

8

1 is that right?
 2 **A.** It would have been around then, yes.
 3 **Q.** When you started in your role as
 4 an Investigation Manager for the Post Office --
 5 and so I think you say that was around three or
 6 2004 --
 7 **A.** I think so, yeah.
 8 **Q.** -- were you given any refresher training on
 9 criminal investigation?
 10 **A.** I don't believe so. I don't believe so.
 11 **Q.** Could we have on screen, please, paragraph 10 of
 12 Mr Knight's statement. That is page 7 of
 13 WITN08290100.
 14 In the context of the role of Investigation
 15 Manager, you say this:
 16 "During this time, although I cannot recall
 17 exactly when, I attended Chesterfield Future
 18 Walk building to receive counter training. The
 19 training would have given a basic understanding
 20 of Horizon, ie how the system performed
 21 transactions, not data analysis. There was also
 22 a refresher course where we were tasked with
 23 working in the DMBs for 3 days during the
 24 Christmas period and again when we were tasked
 25 with covering strike action win the DMBs ..."
 9

1 looked and assessed and reported, whether it
 2 pointed to or away from the suspect. Also,
 3 every line of inquiry that was reasonable would
 4 be followed. I would have been aware of this
 5 process through the policies that were in place
 6 and training that was provided although I can no
 7 longer remember the specifics."
 8 So you are clear, are you, that you
 9 understood when you were an Investigator, that
 10 you had an obligation to pursue lines of inquiry
 11 which pointed away from the guilt of a suspect,
 12 as well as towards?
 13 **A.** Yes.
 14 **Q.** Going over the page, please, to paragraph 49.
 15 You say here:
 16 "As mentioned previously in this statement
 17 the Investigator disclosure obligation would be
 18 by discharged by completing the various PO SEC
 19 disclosure forms, 006 A, B, C & D. I would have
 20 been aware of the disclosure forms from the
 21 policies that were in place although I can no
 22 longer remember the exact policy in place during
 23 my time in the team. I also received training
 24 when I joined the team as well as guidance from
 25 the Legal team."
 11

1 So those are directly managed branches?
 2 **A.** Yes.
 3 **Q.** "... (possibly 2006 to 2008, I cannot recall
 4 exactly). We also received training on security
 5 equipment at various times when I was within POL
 6 as the role covered both investigative and
 7 physical security. I also recall Cartwright
 8 King giving specific training which covered
 9 notebook use, interviewing and disclosure to
 10 solicitors at interview."
 11 The Cartwright King training you refer to
 12 here, is that the Cartwright King training which
 13 happened in 2013, which is addressed in a number
 14 of emails sent to you by the Inquiry for the
 15 purposes of preparing your statement?
 16 **A.** I think it would be latterly, yes.
 17 **Q.** You address at paragraphs 44 and 45 of your
 18 statement the refresher training that you do
 19 recall receiving dealing with interviews and
 20 taking statements. Could we turn, please, to
 21 page 18 of this statement, paragraph 47, and you
 22 say this:
 23 "Investigators had a duty to investigate
 24 a case fully. During an investigation any
 25 evidence/information that came to light would be
 10

1 You refer here to the Investigator
 2 disclosure obligations.
 3 **A.** Mm-hm.
 4 **Q.** Could we have on screen, please, a document
 5 provided to you by the Inquiry for the purposes
 6 of preparing your statement, which governs the
 7 disclosure of unused material to the defence.
 8 The document reference is POL00104762.
 9 This document is dated May 2001, which we
 10 can see at the bottom and we can see from the
 11 title at the top that it refers to the Criminal
 12 Procedure and Investigations Act 1996 Codes of
 13 Practice. Did you recognise this document when
 14 it was sent to you by the Inquiry?
 15 **A.** Yes, I did, the content of it. I don't know
 16 whether it was this particular one as in the
 17 date but, yeah, I recognised it.
 18 **Q.** Do you think it was provided to you when you
 19 were an Investigator?
 20 **A.** I would suggest it was available, yes, and
 21 provided.
 22 **Q.** Under "Purpose", the document says this:
 23 "The aim of this policy is to ensure that
 24 Security Managers know and understand the
 25 Investigation Procedures in relation to the
 12

1 Disclosure of Unused Material as described in
 2 the Criminal Procedure and Investigations Act
 3 1996 Codes of Practice, which must be adhered to
 4 by all Consignia staff undertaking
 5 investigations."

6 You refer in your statement to the Inquiry
 7 to the Criminal Procedure and Investigations
 8 Act, governing the conduct of your
 9 investigations. At the time you were
 10 an Investigator, were you aware of the Criminal
 11 Procedure and Investigations Act Code of
 12 Practice?

13 **A.** Yes, I believe it was -- I think it might have
 14 been a little book.

15 **Q.** Were you aware that this applied to your work as
 16 an Investigator?

17 **A.** Yes.

18 **Q.** The document explains in the "Introduction"
 19 that:

20 "The rules relating to the disclosure of
 21 unused material to the defence are laid down in
 22 the Criminal Procedure and Investigations Act
 23 1996.

24 "In light of the Human Rights Act 1998 the
 25 Attorney General has issued new Guidelines on

13

1 Do you recall that being the case, that the
 2 Investigator and the Disclosure Officer in
 3 a case were usually the same person?

4 **A.** Usually. There was only one Investigator in the
 5 case. So yes.

6 **Q.** You refer in your statement at paragraph 49,
 7 which we've looked at, to the disclosure forms
 8 which were completed by the Investigator. Did
 9 you understand, when you were an Investigator
 10 completing disclosure documentation, that you
 11 were acting as the Disclosure Officer in the
 12 case?

13 **A.** I don't know in those terms. I knew that they
 14 were to be completed. I guess, by its
 15 reference, that if I was disclosing it then
 16 I would be the Disclosure Officer but I wouldn't
 17 associate myself as that, I'd just be the
 18 Investigator providing those documents --
 19 completing those forms.

20 **Q.** At the time, did you understand that the
 21 Disclosure Officer role was a distinct role over
 22 and above your role as an Investigator, which
 23 imposed on you additional and distinct duties?

24 **A.** I don't recall thinking that. I don't know.

25 **Q.** In terms of your training on the Horizon system,

15

1 the disclosure of unused material. The
 2 Guidelines clarify the responsibilities of
 3 Investigators, Disclosure Officers, Prosecutors
 4 and Defence Practitioners."

5 Were you aware at the time you were
 6 an investigator of the Attorney General's
 7 Guidelines on Disclosure?

8 **A.** I don't recall that specifically.

9 **Q.** It is not referenced in this document but were
 10 you aware of, and did you ever refer to, the
 11 Code for Crown Prosecutors?

12 **A.** I don't believe so.

13 **Q.** Further down this page, we have the general
 14 principles section with a section on
 15 Investigators and Disclosure Officers. Then
 16 over the page, please, the second paragraph on
 17 this page says this:

18 "The Disclosure Officer is the person
 19 responsible for examining material retained
 20 during an investigation, revealing material to
 21 Legal Services during the investigation and any
 22 criminal proceedings resulting from it, and
 23 certifying to Legal Services that he has done
 24 this. Normally the Investigator and the
 25 Disclosure Officer will be the same person."

14

1 we have looked on screen at paragraph 10 of your
 2 statement already. You deal in that paragraph
 3 with the counter training you received on the
 4 Horizon system. Do you recall the rollout of
 5 the Horizon system?

6 **A.** I don't, no.

7 **Q.** Were you told, when you were trained on the
 8 Horizon system, about any Acceptance Incidents
 9 or technical problems with the system arising
 10 during the rollout?

11 **A.** No. The training was literally just seeing the
 12 screen and using it to do little transactions.

13 **Q.** Were you ever given any training on Horizon from
 14 the point of view of an Investigator looking at
 15 Horizon data in the course of an investigation?

16 **A.** I don't believe there was specific training of
 17 looking at data.

18 **Q.** Turning, please, to the supervision there was of
 19 Investigators' work, could we have on screen,
 20 please, paragraph 24 of Mr Knight's statement.
 21 That is page 11 of the statement. You say here:

22 "The Inquiry has asked me what supervision
 23 there was over criminal investigations conducted
 24 by Security Managers. From what I recall
 25 between 2004 to 2007 Senior Managers would view

16

1 case papers that were submitted for legal advice
 2 via our Casework Team and would add comments or
 3 give advice to the Investigator. I believe this
 4 then grew into the Case Compliance process.
 5 This was a checklist setting out a list of
 6 actions to ensure everything had been completed
 7 correctly. In addition, during my latter years
 8 as an Investigator there was a monthly Cases on
 9 Hand meeting where Security Managers would
 10 provide updates on their cases and what actions
 11 were needed. The team leaders would discuss and
 12 come up back with any recommendations. In
 13 general, I could always ask my team leader or
 14 a peer for advice on a current investigation.
 15 But my memory of how things changed over the
 16 years is not complete."

17 Should we take it from this that, at least
 18 within your team, Investigators would discuss
 19 their cases with each other?
 20 **A.** Not in a formal -- there might be a mention of
 21 a case. It wasn't a discussion about this case
 22 and this was what happened. It might just be
 23 a -- almost over a coffee type discussion.
 24 **Q.** Going back a page, please, to paragraph 23 of
 25 Mr Knight's statement. Here you address the
 17

1 employees?
 2 **A.** I don't believe so.
 3 **Q.** Turning, please, to the involvement of
 4 Investigators following an audit identifying
 5 an apparent shortfall. Could we have on screen,
 6 please, paragraph 29 of Mr Knight's statement,
 7 that is page 13. You say here:
 8 "In the early 2000s an Investigator was more
 9 likely to get called to an audit to enable them
 10 to approach the SPM and/or staff and arrange
 11 further enquiries. In later years this approach
 12 diminished as Auditors were instructed to write
 13 down any significant comments made by the SPM or
 14 staff. Auditors were trained in this and the
 15 fact that they should not solicit comments as
 16 they should not get into an interview scenario.
 17 This relates to adhering to PACE (cautioning
 18 someone before they were asked or if they were
 19 starting to admit to a crime)."

20 Were you aware of the practice of Auditors
 21 taking so-called admission statements from
 22 an SPM and getting them to sign it before the
 23 arrival of an Investigator?
 24 **A.** I don't know if I was aware. I -- presumably
 25 there must have been because I guess this is why
 19

1 process for dealing with complaints about the
 2 conduct of an investigation by the Security
 3 Team, and you say this:

4 "I am not sure of the process or if there
 5 was one. I would expect if an SPM had an issue
 6 with an investigation, they would raise it with
 7 their Contract Manager or the National
 8 Federation of SubPostmasters who would then
 9 follow up the issue with senior management in
 10 the Security Team."

11 This deals with subpostmasters. Do you know
 12 what the route or process was for Crown Office
 13 employees if they had an issue with
 14 an investigation? Those individuals, of course,
 15 would not have the benefit of the membership of
 16 the NFSP.

17 **A.** Potentially they would have their own union, the
 18 UCW. So, it would be basically a union,
 19 an equivalent union or, potentially, a line
 20 manager, which would be the same sort of
 21 structure as in the network.

22 **Q.** As far as you were aware, did Crown Office
 23 employees, through any union or representative,
 24 have any input into the policies and procedures
 25 governing the investigation of Crown Office
 18

1 this was brought in. So -- I don't know how to
 2 answer that, if I'm honest. I can't think of
 3 any examples but I would assume that there must
 4 have been something -- or I can't remember any
 5 examples but I assume there must have been
 6 something for this to have been implemented.

7 **Q.** By "this", do you mean training of Auditors?
 8 What do you mean by "this"?

9 **A.** Sorry, yes. They called it a -- I think they
 10 brought a form in and it was "Significant
 11 Comment". I forget the title of it. Notes --
 12 something of significant comment, and Auditors,
 13 I believe, were -- I don't know who they were
 14 trained -- I think they were possibly trained by
 15 maybe some of the Security Team at team
 16 meetings, or whatever, but there would be
 17 something to give them details that, as it says
 18 there, that they weren't to elicit -- you know,
 19 get into a questioning scenario but if,
 20 something was said to them, then they were to
 21 write it down and get the person to sign it as
 22 an agreed content.

23 **Q.** At paragraph 30, you deal with the circumstances
 24 in which an investigation would take place, and
 25 you say this:
 20

1 "In order to determine if an investigation
2 was to take place, the information would be
3 given to an Investigator by the Team Leader. It
4 is my understanding that the decision would be
5 made if the loss reached a threshold (from
6 memory I think it was £5,000) or there was
7 suspected/admitted dishonesty. If the matter
8 was being dealt with by the Contract Team and
9 there was no suspected criminality
10 an investigation case would not be raised."

11 You have used the word "or" between "the
12 loss reaching a certain threshold" and there
13 being "suspected/admitted dishonesty". Should
14 the Chair understand from that that, where there
15 was an apparent shortfall identified at audit,
16 providing the amount met the threshold, there
17 would be an investigation, regardless of whether
18 there was suspected or admitted dishonesty?

19 **A.** This wasn't my role to, you know, begin
20 an investigation but I think there was some
21 criteria. Like I say, £5,000, I think that was
22 but I couldn't be certain of it. But I think
23 there was certainly some sort of criteria
24 involved but, again, it wasn't something that
25 I would be doing. It was a Team Leader role.

21

1 **Q.** Can have on screen please document reference
2 POL00126810. This is a copy of your CV from
3 a point in the past, I'm not sure exactly the
4 date of this document but you've seen this
5 before and were provided with a copy for the
6 purposes of preparing your statement. At the
7 top, you list a number of key achievements. The
8 third bullet point down says this:

9 "being the Lead Investigator in a number of
10 cases where the employees have been found guilty
11 after progressing an investigation to Court."

12 Was pressure ever placed on Investigators to
13 increase the number of successful prosecutions?

14 **A.** No. I don't see how it could be but, no, it
15 certainly wasn't, as far as I was aware.

16 **Q.** Was your performance ever assessed by reference
17 to the number of cases where an individual had
18 been found guilty after an investigation was
19 progressed to court?

20 **A.** No, not at all.

21 **Q.** Were bonuses or financial reviews ever linked to
22 the number of successful prosecutions achieved,
23 either by an individual Investigator or a team
24 of Investigators?

25 **A.** No. I don't believe so, no.

23

1 **Q.** Going over the page, please, to paragraph 32,
2 about five lines up from the bottom of
3 paragraph 32, you say:

4 "During the investigation of a case the
5 decision as to what crime (Theft or False
6 Accounting), if any, had been committed and the
7 points to prove would have to be covered. The
8 relevant information would be passed to the
9 Legal Team who would have the final decision on
10 whether a case should progress to court."

11 In terms of the culture of the Investigation
12 Team, were investigations viewed as
13 a fact-finding activity or were they seen
14 instead as a form of prosecutorial support?

15 **A.** I would have to say the former, fact-finding,
16 because I certainly, from experience, I can
17 recall interviewing somebody and realising that
18 this person wasn't either the suspect or there
19 was something else, so it was a start point.

20 **Q.** Looking at the wording there about points to
21 prove, were investigations seen as the vehicle
22 by which points were proved?

23 **A.** What I mean by that is the points to prove for
24 the offence. That would be to cover the *mens*
25 *rea* and *actus reus*, those points.

22

1 **Q.** Why was it that you considered it a professional
2 achievement to have been the Lead Investigator
3 in cases which led to guilty verdicts after
4 prosecution?

5 **A.** I don't -- well, it's obviously on my CV.
6 I don't recall when it was done. I'm guessing
7 at the time, ultimately, if you're investigating
8 a case and it went through to court and it had
9 been found guilty, you'd sort of done your job,
10 is only the way I can, you know, sort of explain
11 it.

12 **Q.** Could we have on screen, please, document
13 reference POL00167241. This is an email from
14 Chris Card, whose role is described as Law
15 Enforcement and Performance Manager, if we can
16 scroll down a little, please -- at the bottom
17 there: Law Enforcement and Performance Manager
18 for Royal Mail Security.

19 The email itself, going back up to the top,
20 please, is dated 1 November 2011 and you are one
21 of a long list of recipients. The email
22 attached to it, if we can scroll down, please,
23 showing the attachment, an Investigation
24 Communication, "Investigation Communication 5".

25 Could we have that communication on screen,

24

1 please, the reference is POL00167242. This is
2 also dated 1 November 2011. It says it is
3 issued to "Royal Mail Letters Security
4 (Investigations)". Can you help with why it was
5 being sent to Post Office Investigators?

6 **SIR WYN WILLIAMS:** Sorry, Ms Price, both those
7 documents on screen, I think, are dated 2010,
8 not '11.

9 **MS PRICE:** My apologies, sir. That is my
10 misdescription. You're entirely right.

11 **SIR WYN WILLIAMS:** That's okay. I just want to be
12 sure I had the right document, that's all.

13 **MS PRICE:** You entirely do, sir. My apologies.
14 It's 2010.

15 The "Issued to" lists "All Royal Mail
16 Letters Security (Investigations)". Can you
17 help with why it was being sent to Post Office
18 Investigators?

19 **A.** Hopefully I can, yes. Obviously, up until Royal
20 Mail and Post Office Limited split in 2012
21 I believe it was, up until that time, so 2010,
22 Royal Mail would have been the lead security
23 investigation policyholder so they would have
24 driven the policies and then disseminated it to
25 everybody, as you've seen in that list.

25

1 Investigators in Royal Mail Letters Security
2 with clear guidance on the procedure to be
3 adopted to ensure that the recovery of business
4 assets dishonestly obtained is maximised and
5 that appropriate applications are made for
6 Compensation and Cost Orders at Court."

7 At paragraph 3.1, there is this:

8 "The recovery of criminal assets and
9 business losses is of paramount importance to
10 Royal Mail Group Limited. This not only
11 increases the deterrent effect of committing
12 acquisitive crime it also makes complete
13 commercial sense. Accordingly Investigators
14 must ensure that whenever possible offenders
15 repay the value of any benefit acquired as
16 a result of their criminality and any costs
17 incurred by the business as a result of the
18 investigation or prosecution."

19 Do you recall reading this document now?

20 **A.** I don't, I'm afraid, no.

21 **Q.** Do you recall there being any discussion about
22 why it was felt necessary to stress to
23 Investigators that the recovery of criminal
24 assets and business losses is of paramount
25 importance to Royal Mail Group?

27

1 **Q.** The Procedures & Standards document is referred
2 to in here but, reading the content of this
3 communication:

4 "The recovery of criminal assets and
5 business losses is of paramount importance to
6 Royal Mail Group Limited. This not only
7 increases the deterrent effect of committing
8 acquisitive crime it also makes complete
9 commercial sense. Accordingly, new Procedures &
10 Standards dealing with the Recovery of Property
11 Obtained Dishonestly, Compensation, Costs and
12 Final Disposal of Case Exhibits have been
13 published on the Royal Mail Security SharePoint
14 site.

15 "Investigators should familiarise themselves
16 with the provisions of the new P&S and bring
17 them and the new forms into immediate effect."

18 The Procedures & Standards document referred
19 to in this investigation communication is at
20 POL00104846. Could we have that on screen,
21 please. We can see the title there "Recovery of
22 Property Obtained Dishonestly, Compensation,
23 Costs and Final Disposal of Case Exhibits, P&S
24 document 9.6", and the "Purpose" is:

25 "The aim of this document is to provide

26

1 **A.** I don't know why it was worded like that or sent
2 like that.

3 **Q.** As an Investigator, did you ever feel any
4 pressure to use prosecutions as a means of
5 recovery apparent losses from subpostmasters and
6 branch staff?

7 **A.** No, no. Just on that one, branch staff -- well,
8 yeah. Sorry, no. I was going to say branch
9 staff, if they have losses in branch, they don't
10 cover it but, if they were prosecuted
11 potentially, yes, so I apologise.

12 **Q.** Could we have on screen, please, document
13 reference POL00167366. This is an email from
14 Jane Owen to you and a number of others, and it
15 is dated 14 April 2010. The subject of the
16 email is "Matters affecting case closures and
17 failings", and it reads as follows:

18 "Dear All

19 "Just a reminder that you need to ensure
20 that we are sent separate notifications for both
21 the case closure and the failings.

22 "There have been a couple of instances
23 whereby the failings have been included on the
24 closure document which has then been sent to
25 Secondary Stakeholders. We need to be mindful

28

1 of the audience that receives the failings as
2 these are to identify improvements within the
3 business and not for sharing with the external
4 customer."

5 Do you recall the issue being raised in this
6 email?

7 **A.** I don't, if I'm honest, no.

8 **Q.** Why would it have been a problem for secondary
9 stakeholders to have been aware of failings
10 identified in the course of an investigation?

11 **A.** The way I read that, and, presumably, if I read
12 it back then, would be because, obviously, the
13 Post Office conducts transactions on behalf of
14 numerous other stakeholders, so if there was
15 a failure in a product or a transaction of
16 a product, or something of that nature, that's
17 what I'm guessing what is being referred to.

18 **Q.** Was this reflective of a wider culture within
19 the Post Office to conceal failings from those
20 outside of the business?

21 **A.** I don't know.

22 **Q.** Could we have on screen, please, paragraph 33 of
23 Mr Knight's statement to the Inquiry, that is
24 page 14. At paragraph 33 you say this:

25 "When I received a case for investigation
29

1 Credence data?

2 **A.** Yes.

3 **Q.** So you did that in all cases?

4 **A.** Yes.

5 **Q.** Before Credence data was available, what did you
6 rely upon?

7 **A.** I don't know. I don't know.

8 **Q.** Can you recall there being Horizon printouts
9 obtained by the Auditor printed from the counter
10 in a branch?

11 **A.** I do recall printouts. There was various
12 documentation that is produced by a branch at
13 various points, in a day, in a month, or
14 whatever.

15 **Q.** In general terms, did you consider that Credence
16 data was sufficient to evidence a loss to the
17 business?

18 **A.** I don't know whether it would evidence a loss.
19 It would just be sort of transactional data, as
20 I've said there, if there was something specific
21 you're looking for, it was transactional data.
22 Nothing sort of stood out, per se.

23 **Q.** Where you had a report from an Auditor saying
24 what had been found in terms of cash and stock
25 in a branch and that was being compared to

31

1 I would start by understanding the background,
2 including the audit result and why the audit had
3 taken place. Usually, the branch was targeted
4 for audit as the branch had come to the
5 attention of the Branch Analysis Team (BAT) due
6 to anomalies or concerns. For example, this may
7 be because the branch had not returned cash when
8 asked to do so or had complete suspicious
9 transactions such as a large number of reversals
10 or excess spoiled postage. I would also obtain
11 the last 3 months of Credence data to view the
12 updated data in relation to concerns raised by
13 BAT. If necessary, further archive data may
14 have been needed via the ARQ process."

15 You say here that you would obtain the last
16 three months of Credence data to view data
17 relating to concerns by the Branch Analysis
18 Team. First of all, what was the Branch
19 Analysis Team and where did it sit within the
20 structure of the business?

21 **A.** I think it sat in the FSC, the Finance Service
22 Centre, initially.

23 **Q.** In cases where the audit had taken place in the
24 absence of any concerns being raised by the BAT,
25 would you obtain the last three months' of

30

1 Credence data about what the Horizon system said
2 should be in branch, in that context, did you
3 consider that the comparison between those two
4 things was sufficient to evidence a loss to the
5 business?

6 **A.** The audit would be the result. So they would do
7 their balance of what the Horizon system in
8 branch said should be there and they would count
9 it and if it was there or wasn't there. If it
10 wasn't there, obviously, there was a loss. The
11 Credence data was just the data of all the
12 transactions along the way. Obviously, there
13 was other data and the back office data, for
14 transfers and logging on and logging off and
15 suchlike. That was the data. So it wasn't used
16 to verify the audit, if that makes sense.

17 **Q.** So from your perspective, the audit report
18 produced from the Auditor, was that the evidence
19 that you considered proved a loss to the
20 business?

21 **A.** Yes.

22 **Q.** What guidance was given to Investigators to
23 assist them in obtaining Horizon data from
24 Fujitsu?

25 **A.** I just -- you could request it from the Security

32

1 Team, the archived data. So anything over three
 2 months, obviously. You could request it from --
 3 or they would request it on your behalf from
 4 Fujitsu.

5 **Q.** You've referred to anything over three months.
 6 Was that the only reason you would seek ARQ data
 7 from Fujitsu, if you wanted to go further back
 8 in time?

9 **A.** That was -- I guess so, yes.

10 **Q.** Could we have on screen, please, paragraph 57 of
 11 Mr Knight's statement. That is page 22, please.
 12 You say in the first sentence here:
 13 "When required, Credence data would more
 14 than likely be used as that showed exactly the
 15 same information as ARQ data."
 16 Who told you that that was the case?

17 **A.** I don't know whether anybody told me that was
 18 the case. I think it was -- I think it was
 19 because it was transactional data, if that ...

20 **Q.** Were you aware, when you were an Investigator,
 21 that the audit trail data held by Fujitsu
 22 contained more information than in the standard
 23 ARQ response?

24 **A.** Sorry, say that again?

25 **Q.** Were you aware that there was additional data

33

1 **A.** I don't know. I don't recall.

2 **Q.** Do you recall ever doing that?

3 **A.** I don't know -- no, I don't recall.

4 **Q.** Was this step ever taken before a decision was
 5 made to prosecute?

6 **A.** I don't know.

7 **Q.** Was this step ever taken before a not guilty
 8 plea was entered, to your recollection?

9 **A.** Again, I don't recall.

10 **Q.** Were you aware at the time that there was
 11 a quota placed on audit request queries made of
 12 Fujitsu?

13 **A.** I don't know. I'm aware now because of the team
 14 I'm in, we manage that process. So I'm aware
 15 now. I don't know if I was aware then. I think
 16 I probably was. I think there was made mention
 17 of quotas but I don't think I could pinpoint
 18 what it was at the time. But I think I was
 19 aware.

20 **Q.** Was this something which you were ever conscious
 21 of when deciding whether to seek further data
 22 from Fujitsu?

23 **A.** No, I don't believe so.

24 **Q.** You say at paragraph 38 of your statement to the
 25 Inquiry that NBSC call logs were requested to

35

1 held by Fujitsu, which contained more
 2 information than you would find in a standard
 3 ARQ response to a request?

4 **A.** I don't know, I can't recall.

5 **Q.** Were you ever made aware that an enhanced
 6 interrogation of the audit trail could show when
 7 a transaction or event had been performed by the
 8 system?

9 **A.** There was transactional data and event data, if
 10 that makes -- so one was the transaction and was
 11 sort of the front end, and the other one was the
 12 back office. That's what I understand.

13 **Q.** Were you aware that others could perform
 14 enhanced interrogation of audit data and find
 15 more information, particularly when
 16 a transaction or event had been performed by the
 17 system?

18 **A.** I don't know if I was aware of that.

19 **Q.** Who was responsible for deciding whether to
 20 retrieve Horizon data from Fujitsu?

21 **A.** I'd say the Investigator.

22 **Q.** Were there ever circumstances in which you would
 23 request more detailed audit data from Fujitsu
 24 before you interviewed a subpostmaster or branch
 25 staff member?

34

1 understand if the branch had reporting issues
 2 that related to the Inquiry. Would you request
 3 NBSC call logs in all apparent shortfall cases
 4 you dealt with?

5 **A.** Possibly not.

6 **Q.** In what circumstances would you?

7 **A.** Um ... I don't know. If somebody had been
 8 querying something, if they thought they'd been
 9 queried it, or just to check, I don't recall.

10 **Q.** In what circumstances would you request Horizon
 11 helpline call logs in addition to the NBSC call
 12 logs?

13 **A.** I think that was probably -- I can't recall
 14 doing it. Probably latterly, I would suggest.
 15 I can't think -- sort of early, when I joined
 16 POL.

17 **Q.** You say latterly. Why latterly?

18 **A.** I think there was -- just because that was --
 19 I think that was sort of brought in towards --
 20 I want to say latterly, probably 2010-ish,
 21 around that way, I think.

22 **Q.** Turning, please, to the role of the Security
 23 Team in relation to prosecution decisions.
 24 Could we have on screen, please, paragraph 40 of
 25 Mr Knight's statement to the Inquiry, which is

36

1 page 16. You say here:
 2 "Once the Investigator had concluded the
 3 investigation or got to a point where legal
 4 advice was needed, the case file would be passed
 5 to the Legal Team who would decide if a case was
 6 to be taken to Court. The Designated Authority
 7 Manager (DAM), a senior member of the Security
 8 Team, would give the final consent to continue
 9 to prosecution."
 10 Was the Designated Authority Manager the
 11 same role as the Designated Prosecution
 12 Authority?
 13 **A.** Yes, I've probably called it the wrong name but,
 14 yes.
 15 **Q.** Did an Investigator conducting the relevant
 16 investigation have any input into the decision
 17 as to whether someone should be prosecuted?
 18 **A.** No.
 19 **Q.** Did it ever strike you as being inappropriate
 20 that a Senior Security Manager from the Security
 21 Team, which was responsible for conducting
 22 initial investigations, was the one to give the
 23 final consent to continue to prosecution?
 24 **A.** I never thought about it. It was just
 25 a process.

37

1 down the page, please, Robert Daily asks:
 2 "And your experience with Horizon, how would
 3 you -- how would you rate it?"
 4 Mr Holmes says:
 5 "Very slow, um, it's okay it's an auditor's
 6 tool. Um, that particular one we had problems
 7 with because it was connected to a telephone
 8 line that also had the fax machine connected to
 9 it."
 10 Robert Daily says:
 11 "The one's that? Jesmond?"
 12 Mr Holmes says:
 13 "At Jesmond [the branch]. And we had BT
 14 engineers in looking at the line, we had Horizon
 15 engineers in looking at the line. And
 16 eventually we had to take the fax machine out,
 17 throw it away and get a new one in, provided by
 18 Mr Canner. And now it seemed to work. But
 19 there was a time when --
 20 "What, what", says Mr Daily.
 21 "It wasn't so slow -- it wasn't so good.
 22 People using cards just weren't getting
 23 through."
 24 Mr Daily says:
 25 "Err, what period was that?"

39

1 **Q.** Could we have, please, paragraph 56 of
 2 Mr Knight's statement on the screen, please.
 3 It's page 9 -- it's not page 9, my apologies.
 4 It's page 22, paragraph 56. You say this:
 5 "During my time in the Security Team before
 6 the GLO, I do not recall an SPM, SPM assistant
 7 or Crown Office employee attributing a shortfall
 8 to problems with Horizon."
 9 Could we have on screen, please, document
 10 reference POL00066743. This is a transcript of
 11 the interview with Peter Holmes on 19 September
 12 2008, for which you were a second officer, and
 13 this is one of the cases you address in your
 14 statement. You were provided with the record of
 15 tape recorded interview for the purposes of
 16 providing your statement and you've more
 17 recently been provided with this transcript of
 18 the tape. Have you had a chance to read through
 19 it?
 20 **A.** I believe I have, yes.
 21 **Q.** It is just a full transcript, as opposed to the
 22 summary and partial transcription we find in
 23 a record of tape recorded interview.
 24 **A.** Right.
 25 **Q.** Could we go, please, to page 7. About halfway

38

1 "Um, I suppose nine month ago for three
 2 month.
 3 "So we're talking about the beginning of
 4 this year? December?
 5 "I'm not very good with times, but yes,
 6 possibly."
 7 Mr Holmes, at this point in the interview,
 8 was raising some technical problems with the
 9 functioning of the system here, wasn't he?
 10 **A.** It seems that way.
 11 **Q.** Could we go, please, to page 27 of this
 12 document, and this Robert Daily again asking the
 13 questions. About two-thirds of the way down the
 14 page there, he says:
 15 "Yeah. So what can you tell me about the
 16 shortage then?"
 17 Mr Holmes says:
 18 "I have absolutely no idea.
 19 "No idea?"
 20 "Absolutely no idea. Unless it's the
 21 Horizon that's let us down. I -- I mean there's
 22 nobody in there storing 46,000, I haven't got
 23 it, it's not in my bank account. Um, I spent
 24 too many years in the police force seeing things
 25 go wrong to start stealing money from anybody.

40

1 Um, I just -- I really do not know.
 2 "Okay, [says Robert Daily]. Why is there
 3 two cash declarations then?
 4 "There was one in because I knew we were
 5 showing short and I covered it up.
 6 Mr Daley: "Covered what up?"
 7 Mr Holmes: "The fact we were short in cash.
 8 "By how much?
 9 "... I can't remember ..."
 10 So Mr Holmes here was offering, as
 11 a possible explanation, the shortage being
 12 caused by the computer system, the computer
 13 system letting them down, wasn't he?
 14 **A.** Yes, from reading that, on top of what he was
 15 saying, it was slow and not very functional.
 16 **Q.** Could we have on screen, please, document
 17 reference POL00120627. This is a suspect
 18 offender report sent by you to the Fraud Team
 19 and to Graham Ward on 1 February 2009, relating
 20 to the investigation of Scott Darlington. Next
 21 to the "BRIEF summary of facts of the case",
 22 there is this:
 23 "Audit shortage, £40K. [Subpostmaster] told
 24 auditors immediately that there would be
 25 a shortage. He said he was expecting TCs."

41

1 see at the bottom it's from Jarnail Singh,
 2 Senior Lawyer, Criminal Law Division.
 3 Going back to the first page at the top,
 4 please. This is sent to Post Office Security
 5 and copied to you and Graham Ward, as well as
 6 the Press Office, and it is dated 2 March 2010.
 7 Mr Singh is reporting back on the outcome of the
 8 Darlington case, and he says this:
 9 "The above named Defendant having pleaded
 10 Guilty to all 5 counts of false accounting at
 11 Chester Crown Court on 1 February 2010. He
 12 attended Chester Crown Court for sentence on
 13 23 February. The prosecution was conducted by
 14 Deborah White and the defendant was also
 15 represented and the case was heard by His Honour
 16 Judge Dulton.
 17 "On hearing the facts of the case His Honour
 18 Judge Dulton enquired whether there was
 19 an actual loss or whether the missing funds were
 20 the result of a 'glitch' in Royal Mail systems.
 21 Counsel for the defence maintained that he had
 22 pleaded on the basis that although there was
 23 a shortfall Mr Darlington was not responsible
 24 for it and had merely covered it up.
 25 Prosecution counsel requested a Newton Hearing

43

1 That's transaction corrections, isn't it?
 2 **A.** Mm-hm.
 3 **Q.** Then under this, next to "BRIEF summary of
 4 admissions/denials made at interview":
 5 "Admitted false accounting since first
 6 shortage in September/October Trading Period.
 7 Denied stealing -- adamant that it would be
 8 errors and TCs would come to light."
 9 So this subpostmaster was saying that the
 10 shortage was caused by errors and he expected
 11 transaction corrections to come to light. Is
 12 that a fair summary of what this document is
 13 saying?
 14 **A.** Yes.
 15 **Q.** Would you not categorise this as a subpostmaster
 16 attributing a shortfall to the Horizon system?
 17 **A.** No, I wouldn't. Not that. Errors to me -- and
 18 TCs were errors, something that had occurred in
 19 the branch by somebody making a mistake or, you
 20 know, an error, not a technical Horizon
 21 deficiency.
 22 **Q.** Could we have on screen, please, document
 23 reference POL00120600. This is a memo from
 24 Jarnail Singh, if we can scroll down, please, to
 25 the second page. Apologies, down again. You

42

1 to address the issue however having considered
 2 the request His Honour Judge refused the
 3 adjournment that the expense of the delay of
 4 further investigation was unjustifiable and that
 5 he proposed to proceed on the basis most
 6 favourable for the defendant. As a result
 7 Mr Darlington was sentenced on the basis that no
 8 money was missing and His Honour Judge sentenced
 9 as follows ..."
 10 Then further down that page, the sentence is
 11 set out.
 12 Do you recall being made aware that the
 13 judge had queried in this case whether there was
 14 an actual loss or whether instead there was
 15 a glitch in the Royal Mail systems?
 16 **A.** I believe I was but I think I was actually --
 17 I think I was actually in the -- not in the
 18 court but in the court building, I think, at the
 19 time. But I don't remember the specifics like
 20 that, and obviously to that but, yes.
 21 **Q.** Did this cause you any concern at the time?
 22 **A.** I don't think I sort of understood it, as such.
 23 I think it was just something that was said
 24 there. I don't know what a glitch, or however
 25 it -- meant. Obviously, you know, hindsight and

44

1 where we are now, looking back, but, at the
 2 time, I wasn't thinking of Horizon issues.
 3 **Q.** Can you recall if there was any discussion
 4 within the Security Team or with the Criminal
 5 Law Team following this judicial comment?
 6 **A.** I don't believe I was -- if there was, I don't
 7 think I was party to it. I don't recall.
 8 **Q.** Can you recall anyone suggesting there should be
 9 a review of what had happened in this case?
 10 **A.** No, I don't.
 11 **Q.** Were you ever trained or given instruction by
 12 the Criminal Law Team or anyone else at the Post
 13 Office on proof of loss when relying on Horizon
 14 data?
 15 **A.** I would say not. As I said, previously, I think
 16 the loss was derived from an audit.
 17 **Q.** Can you recall there being any discussion
 18 following this case of what would be required to
 19 prove loss when Horizon data was being relied
 20 upon?
 21 **A.** I don't recall that.
 22 **Q.** Did the judicial comment in this case cause you
 23 to question your approach to proof of loss in
 24 any future cases?
 25 **A.** I would say no because the process -- it was

45

1 "It's something to do with some sort of
 2 discrepancy."
 3 Mrs Hall says:
 4 "I think it's to do with discrepancy with
 5 the Lottery, and I'm hoping that we can come to
 6 the bottom of this."
 7 You say, "Right".
 8 Mrs Hall says:
 9 "I will pay any money back, what's owed to
 10 Post Office Limited. I am not a thief. I will
 11 pay anything back, but I just want all this to
 12 be looked at in detail, and because Horizon
 13 system's not 100%, if I've got all the details
 14 here. I'd like that to, um, be taken into
 15 account, please."
 16 You say:
 17 "Right, and that's fine. I understand that,
 18 and like I said, I, you know, I don't want to
 19 harp on the subject. Yes, you have given me
 20 some details."
 21 Why did you not want to "harp on the
 22 subject" of the problems with Horizon being
 23 reported by Mrs Hall here?
 24 **A.** I don't think I was relating to the Horizon
 25 problem. I think I was just relating to that

47

1 always the audit.
 2 **Q.** Could we have on screen, please, document
 3 reference POL00021244. This is the transcript
 4 of the second tape from an interview which you
 5 conducted with Alison Hall on 28 September 2010,
 6 some six months after the outcome in the
 7 Darlington case had been communicated via that
 8 correspondence we've just looked at.
 9 **A.** Mm-hm.
 10 **Q.** Again, you were provided with the record of tape
 11 recorded interview for the purposes of preparing
 12 your statement and have more recently been
 13 provided with this transcript of the tapes.
 14 Again, have you had a chance to look through it?
 15 **A.** I've had a look through it, yes.
 16 **Q.** Could we go, please, to page 4 of this
 17 transcript. About two-thirds of the way down
 18 the page, you say this:
 19 "Right, so you're adamant that the £14,000
 20 is nothing that you've done, criminally,
 21 fraudulently, however you want to put it."
 22 Alison Hall says:
 23 "I have not taken a penny out of that Post
 24 Office, criminally. I wouldn't dare."
 25 You say:

46

1 we'd been speaking about the Lottery. I don't
 2 say it would have been the Horizon system.
 3 I don't think there was a discussion much about
 4 that.
 5 **Q.** That comment from you about not wanting to "harp
 6 on the subject" is not included in the record of
 7 tape recorded interview that we've got. Do you
 8 know why that is?
 9 **A.** I don't know. I would suggest when I was --
 10 if -- presumably I did this summary, that that
 11 wasn't a significant comment or anything.
 12 **Q.** Mrs Hall was telling you that the Horizon system
 13 was not 100 per cent and asking for that to be
 14 taken into account. Do you accept that Mrs Hall
 15 was directly raising Horizon integrity issues in
 16 her interview?
 17 **A.** Looking at it now, looking back, but, at the
 18 time, I don't think I took that as great
 19 substance. Just -- it was just -- it just
 20 seemed there, because Horizon not 100 per cent.
 21 Lots of computers, you might say, you know, like
 22 the one previously, if it's slow, or whatever it
 23 might be, it's what the context is of why is it
 24 not 100 per cent.
 25 **Q.** Could we have on screen, please, document

48

1 reference POL00091063. This is the report for
2 the Criminal Law Team which you produced
3 relating to Mrs Hall's case after interviewing
4 her. If we go, please, to the last page of that
5 document, maybe the penultimate page -- forgive
6 me. If we go back two pages, and again, and to
7 the bottom of that page, please, and that's the
8 last page of that document with your name and
9 the date of the report. That's 18 October 2010.

10 **A.** Yes.

11 **Q.** Have you had a chance to read through this
12 document recently?

13 **A.** Yes.

14 **Q.** In this report, you recounted the parts of the
15 interview, if we can go, please, to page 2.
16 Without going through line by line, you set out
17 the parts of the interview with Mrs Hall where
18 she raised issues relating to the Lottery
19 scratchcards but, having looked through this
20 a number of times, I can't find any reference to
21 Mrs Hall's request that the matter be looked at
22 in detail because Horizon was not 100 per cent.
23 Do you agree that that isn't in your report?

24 **A.** Yes, yes.

25 **Q.** Why didn't you include that in your report?

49

1 of where we are now but, back then, again, as
2 I said, that comment about not 100 per cent,
3 I wouldn't have taken that as something that was
4 fundamentally wrong with the system. And the
5 other bits and pieces, you said about the
6 glitch, I don't recall ever being given the full
7 explanation of, you know, what glitches and
8 whatever there was.

9 **Q.** Could we have on screen, please, document
10 reference POL00055783. This is an email from
11 Rob Wilson to Dianne Chan, prosecution counsel,
12 copied to you. It is dated 17 November 2010 and
13 it relates to Mrs Henderson's case. The email
14 reads as follows:

15 "Dianne, have received a defence statement
16 today despite the telephone conversation
17 yesterday. A hard copy has been put in the post
18 today.

19 "At point 2 the Defence allege that any
20 discrepancy was as a result of the Horizon
21 system. There is also a challenge to the
22 initial missing figure of £18,000 which was
23 reduced according to the Defence statement in
24 a matter of minutes. The statement also
25 maintains that further investigation by the

51

1 **A.** I guess I didn't take it as a comment. She was
2 talking about scratchcards and Lottery, and
3 that's what I was sort of focused on.

4 **Q.** By the time you completed this report, you were
5 aware of at least two cases of subpostmasters
6 raising issues to do with Horizon: Mr Holmes'
7 case that we've looked at and Mr Darlington's
8 case. You were also aware of the judge's
9 comments in the Darlington case.

10 You were aware at the time, weren't you,
11 that the advice given by the Criminal Law Team
12 on charging and prosecution decisions was based
13 on the information contained in
14 an Investigator's report to them; were you aware
15 of that?

16 **A.** Yes.

17 **Q.** It was this document which the Criminal Law Team
18 considered when assessing whether any further
19 investigation was needed as well, wasn't it?

20 **A.** I presume so, yes.

21 **Q.** Would you accept, therefore, that it was
22 important for your report fully to reflect any
23 and all reasonable lines of inquiry raised by
24 Mrs Hall in interview?

25 **A.** I would concede that viewing this and in light

50

1 auditor 'would have discovered the whereabouts
2 of the alleged missing sum'."

3 Mrs Henderson had, by this point, made it
4 part of her pleaded case that any discrepancy
5 was as a result the Horizon system, hadn't she?

6 **A.** I believe the defence statement mentioned
7 that -- not during the interview, I think it was
8 the defence statement, I believe. I might be
9 corrected on that but ...

10 **Q.** Indeed. This email is telling you that
11 a defence statement received that day contained
12 an allegation that the discrepancy was as
13 a result of the Horizon system, and you were
14 being told about this, weren't you, in this
15 email from Mr Wilson?

16 **A.** Yes.

17 **Q.** Could we have on screen, please, document
18 reference POL00169422. This is an email from
19 Jane Owen to you and others. It is dated
20 18 January 2011. The subject line is "Urgent
21 update required", and Ms Owen's email reads as
22 follows:

23 "Dear All

24 "Can I please ask for your help urgently.

25 I have been asked to provide an update on the

52

1 attached cases where Horizon integrity has come
2 into question and need the information by
3 tomorrow.

4 "I have checked against the spreadsheet but
5 am unable to cover off the 'gaps' which are
6 namely

7 "Court case details

8 "Result

9 "Accused's defence (exactly).

10 "Could you either add into the spreadsheet
11 using bright pink font as I have done in the
12 recoveries column or just pop updates on
13 an email and I will collate.

14 "Many thanks."

15 Ms Owen attached a spreadsheet. Could we
16 have that on screen, please. The reference is
17 POL00169423.

18 Just scrolling through this spreadsheet, if
19 we're able to, we can see a number of cases
20 listed and, four columns in, column D, we see
21 the Post Office branch being listed, with some
22 information relating to each of those cases --

23 **A.** Mm-hm.

24 **Q.** -- which are said to be ones where Horizon
25 integrity has come into question, as Ms Owen

53

1 **SIR WYN WILLIAMS:** Well, let's say 11.40, is it?

2 **MS PRICE:** 11.40, sir, thank you.

3 (11.23 am)

4 (A short break)

5 (11.40 am)

6 **MS PRICE:** Hello, sir, can you see hear us?

7 **SIR WYN WILLIAMS:** Yes, thank you.

8 **MS PRICE:** Mr Knight, in light of the answers you
9 gave us before the break, I'd like to go to one
10 further document and the reference is
11 POL00325402.

12 This top email is from you to Steve Bradshaw
13 dated 4 February 2010, forwarding the email
14 below which is the subject "Horizon challenges".
15 If we can go, please, to the email below, this
16 is you to Andy Hayward, Iain Murphy, Andrew
17 Daley and Jason Collins. "Horizon challenges",
18 you say:

19 "Gentlemen,

20 "Further to my remark in my previous email.

21 "Regards,

22 "CK."

23 You seem to be providing links there
24 underneath to various articles and resources
25 including Computer Weekly, The Grocer, BBC,

55

1 puts it. On my count, this spreadsheet lists 20
2 cases. Mr Darlington's case is one of these.

3 Do you accept that by January 2011, when
4 Ms Owen sent this email, you were aware that
5 there were at least 20 cases where Horizon
6 integrity had come into question?

7 **A.** Yes, I would have to say that viewing this, but
8 I don't know at the time if I was -- if that
9 had -- had comprehended that.

10 **SIR WYN WILLIAMS:** Well, the email is pretty
11 straightforward in its terms, Mr Knight.

12 **A.** Yes, sir, it's -- I understand what the email,
13 and this sheet -- I -- again, I don't know.
14 I've got no response for it.

15 **SIR WYN WILLIAMS:** Would I be fair if I concluded
16 that, if you had read that email, you must have
17 understood that the attachment contained 20
18 cases where Horizon integrity issues had been
19 raised?

20 **A.** Yes, I would say that's a reasonable assumption.

21 **SIR WYN WILLIAMS:** Thanks.

22 **MS PRICE:** Sir, I wonder if that might be
23 an appropriate moment for the morning break.

24 **SIR WYN WILLIAMS:** Yes.

25 **MS PRICE:** If we could take 15 minutes, please.

54

1 Talking Retail. Just scrolling down, please,
2 that's the bottom of the email, but we've got
3 the title there "Horizon challenges" of that
4 email.

5 Did you understand those Horizon challenges
6 to be challenges to the integrity of the Horizon
7 system when you sent that email?

8 **A.** I don't recall, obviously, what the content of
9 each one of those articles was but I knew that
10 there was a growing media -- as those, you know,
11 a talking point, a topic or whatever. But,
12 again, in comparison with what the business was
13 saying, I think that was probably my point, that
14 we were told that everything is fine, that -- we
15 weren't told anything different but there was
16 this under current.

17 **Q.** In terms of what you say in your statement at
18 paragraph 56, that you do not recall an SPM, SPM
19 assistant or Crown Office employee attributing
20 a shortfall to problems with Horizon, is that
21 not exactly what this is: an email about
22 subpostmasters attributing shortfalls to
23 Horizon?

24 **A.** It is, again, from where we are today, looking
25 back -- but, again, at the time, my viewpoint

56

1 would have been one of what the business was
 2 saying and any sort of challenges, you know, to
 3 Horizon that had been upheld.

4 **Q.** So is paragraph 56 of your statement wrong, in
 5 that case?

6 **A.** I don't know if it's wrong. I don't know how --
 7 how I'm interpreting this information. I'm
 8 going by what I sort of believed at the time,
 9 and what the message was, the overarching
 10 message, I should say, from the business that
 11 everything was okay.

12 **Q.** We'll come in due course to the business message
 13 but could we have on screen, please, document
 14 reference POL00167369. This an email from
 15 Graham Ward to a list of recipients, including
 16 you. It is dated 14 April 2011, and the subject
 17 line is "Credence v Fujitsu" and Mr Ward says
 18 this in his email:

19 "All
 20 "If anyone has any evidence of disparities
 21 between Fujitsu and Credence transaction data,
 22 please get in touch (eg timing issues ...
 23 session numbers not matching for postage label
 24 transactions etc).
 25 "Ta muchly."

57

1 **Q.** This should, shouldn't it, have led you to
 2 question the reliability of the Credence data
 3 you were relying on to prove loss, where you
 4 hadn't requested further data from Fujitsu?

5 **A.** Yes, looking at this in its -- you know, in the
 6 sentence, yes. What those disparities were,
 7 it's given some examples of timing issues,
 8 session numbers not matching. I don't know if
 9 they would have affected the reliability of the
 10 data. I don't know.

11 **Q.** Could we have on screen, please, document
 12 reference POL00107683. This is a report to
 13 Legal Services which was produced by Stephen
 14 Bradshaw on 18 April 2011, four days after
 15 Mr Ward's email about Credence data versus
 16 Fujitsu data. It relates to a case where you
 17 sat in on an interview as a second officer.

18 Could we have page 3 of this report, please.
 19 About halfway down the page is a heading
 20 covering the interview, with Ms Threlfall.
 21 Underneath, Mr Bradshaw says this:

22 "At 12.13 am I interviewed Mrs Rita
 23 Catherine Threlfall at the Liverpool North
 24 Delivery Office ... Present throughout the
 25 interview was Mr Christopher Knight Fraud

59

1 What was your understanding of why this
 2 enquiry was made of you?

3 **A.** I don't honestly recall the email, or -- the
 4 email -- the question. Reading it there,
 5 I don't -- just discrepancies between the
 6 Fujitsu and the Credence data, so ...

7 **Q.** On its face, it suggests there was an issue
 8 being investigated by Mr Ward of a disparity
 9 between the transaction data shown on Credence
 10 and the data held by Fujitsu, doesn't it?

11 **A.** Yes, I guess it does, from the -- on the face of
 12 it, yes.

13 **Q.** That would be potentially very significant,
 14 would it not, where Investigators like you
 15 understood the Credence data to show exactly the
 16 same information as ARQ data?

17 **A.** Yes.

18 **Q.** Did this concern you at all at the time or can
 19 you simply not remember?

20 **A.** I don't -- I don't recall, I'm afraid.

21 **Q.** Looking at it now, would it have concerned you
 22 at the time?

23 **A.** With hindsight, and everything that's gone on
 24 subsequently, I think it would have made me
 25 think, yes.

58

1 Investigator."

2 Then two paragraphs down, Mr Bradshaw
 3 explains that a pre-prepared statement was read
 4 out in the interview by the legal representative
 5 in attendance and the content of that statement
 6 is then set out towards the bottom of that page
 7 and over to the next page. Going over to the
 8 next page, please, the third paragraph down:

9 "She then explained the type of transactions
 10 performed when she took over the branch, the
 11 contact she had with Post Office Limited and
 12 that she used to perform a weekly balance and
 13 that mistakes could readily [be] found."

14 Then going down four paragraphs, please, the
 15 paragraph starting "She then said":

16 "She then said that the system upgrades
 17 started to be implemented and that she did not
 18 know how these upgrades affected the balances.
 19 She told to leave the computer switched on.

20 "She said that when there were discrepancies
 21 it was difficult to get a result from the
 22 transaction log and she received a printed
 23 message stating 'no transaction found'.

24 "She then said that monies were placed to
 25 make good the supposed cash shortages due to

60

1 discrepancies becoming increasingly difficult to
2 uncover. She said that on the balance snapshot
3 the figures show an amount defined as cash and
4 this fixed is meant to equal the declared cash
5 and that for some considerable time these
6 figures at her office differed greatly."

7 She sets out a number of other issues below
8 and then, over the page, please, the second
9 paragraph:

10 "She denied stealing any Post Office monies
11 or false accounted and that she had received no
12 assistance from Post Office Ltd. If these
13 losses had happened at her office, then they
14 must be happening at many more offices."

15 This is another example, is it not, of
16 a subpostmaster, in an interview you were
17 present at, attributing shortfalls to the
18 Horizon system?

19 **A.** Yes, it is.

20 **Q.** Could we have on screen, please, document
21 reference POL00323734. This is an email chain
22 containing emails sent between you and Neil
23 Thorneycroft on 24 May 2011, a little over
24 a month after Mr Ward's email about Credence
25 data versus Fujitsu data. Can you explain,

61

1 a phantom."

2 Then your response to Mr Thorneycroft is at
3 the top, and you say this:

4 "Neil.

5 "Thanks. I hope it won't go to court
6 either.

7 "I have heard she is blaming Horizon now
8 ...!!!!!"

9 There is no way of characterising Mrs Hall's
10 position in this case other than she was
11 attributing shortfalls to the Horizon system, is
12 there?

13 **A.** It was around the Lottery -- she was saying it
14 was Lottery and I tried to, you know, get to the
15 bottom of that and it didn't seem it was
16 Lottery.

17 **Q.** But you're saying here, as a separate issue,
18 aren't you, "I have heard she is blaming Horizon
19 now"?

20 **A.** Yes.

21 **Q.** You were fully aware of that position at the
22 time because it's said, in terms, in this email,
23 weren't you?

24 **A.** It's what, sorry?

25 **Q.** You were fully aware that she was attributing

63

1 please, who Mr Thorneycroft was?

2 **A.** He worked in the Finance Service Centre on the
3 Lottery Team.

4 **Q.** The emails relate to Mrs Hall's case and
5 starting, please, towards the bottom of the
6 page, you email Mr Thorneycroft attaching
7 a statement you put together for him from
8 previous notes about the case.

9 Just pausing there, was it usual for you to
10 prepare draft witness statements for court for
11 witnesses?

12 **A.** It would be, yeah, to go through it because
13 the -- obviously, a member of staff wouldn't
14 know how to complete a witness statement, so it
15 would go through and then obviously he would
16 check that everything is correct that's been put
17 in it.

18 **Q.** Mr Thorneycroft's email replies in the middle of
19 the page, and he says this:

20 "Hi Chris.

21 "Made a few amendments. I'm no longer
22 working as the Lottery Team manager, I've gone
23 back to my previous PO role.

24 "I hope this won't go to court. The
25 perceived Lottery discrepancy was a bit of

62

1 shortfalls to the Horizon system because you
2 have said in terms that that is the case in this
3 email?

4 **A.** I think I must have heard it from Legal
5 Services.

6 **Q.** In Mrs Hall's case you made some enquiries of
7 those responsible for the Lottery and we've seen
8 the interaction here with Mr Thorneycroft but
9 did you make any enquiries of Fujitsu or anyone
10 else within Post Office to explore Mrs Hall's
11 assertion that Horizon was not 100 per cent?

12 **A.** I believe I asked -- I got call logs, if she'd
13 reported any Lottery issues. I don't think
14 there was any Lottery calls to the helpline.

15 **Q.** So what --

16 **A.** But, no --

17 **Q.** -- you were looking for was Lottery calls?

18 **A.** Yes, I was focused on the Lottery.

19 **Q.** Is it the case that when you made your statement
20 and you say you don't recall cases where people
21 were attributing shortfalls to Horizon, is the
22 reason that you didn't recall that you didn't
23 treat the concerns raised as being significant?

24 **A.** That's probably a good explanation. I think it
25 was there was no -- I had no background on what

64

1 the claims were. And, obviously -- and I know
2 you said you're going to get on to it but
3 obviously what the business was saying. So that
4 was probably my thoughts on it.

5 **Q.** Would you accept now that you were unduly
6 dismissive of the concerns which were being
7 raised about the integrity of the Horizon
8 system?

9 **A.** Probably looking at it now, on the information
10 I had then, I was unaware, I would suggest, with
11 all the other information, as we said, about the
12 business and such like. So yeah, in hindsight.

13 **Q.** Do you accept that, at least in Mrs Hall's case,
14 by not exploring concerns about Horizon, you
15 failed to pursue a reasonable line of inquiry?

16 **A.** Again, I say, I was going with the Lottery, so,
17 in essence -- in view of that, I would have to
18 concede to that, I'd suggest.

19 **Q.** Could we have on screen, please, page 40 of
20 Mr Knight's statement paragraph 116. In the
21 first sentence at 116 you say this:

22 "I do not recall being aware of any robust
23 challenges to Horizon (other than the GLO)."

24 What do you mean by "robust challenges to
25 Horizon"?

65

1 but I can't recall them exactly. But it was
2 an overarching message, you know, that the
3 system was fine, and the -- this -- you know,
4 these -- as I say, these claims, or whatever,
5 were not an issue. Just that seemed to be --
6 that was the message.

7 **Q.** You've mentioned John Scott. Was the message
8 coming from outside of the Security Team as
9 well?

10 **A.** I think it was. I think it was. I can't recall
11 who it was but I think it was other senior, you
12 know, managers, who probably had an awareness of
13 what our team did and the business.

14 **Q.** Can you recall what level within the business
15 you're talking about?

16 **A.** I think it would have been more senior people,
17 you know, it would have been senior -- I guess
18 on a level with Mr Scott or potentially more --
19 higher. I can't recall exactly but it just
20 seemed to be that that was the message.

21 **Q.** Did you ever question the party line, given the
22 mounting number of cases which you were aware
23 of, where Horizon integrity was being raised?

24 **A.** No, is the answer to that.

25 **Q.** Do you think you should have?

67

1 **A.** Robust challenges where something had been shown
2 as Horizon was -- had failed or something had
3 been thrown out, you know, completely by
4 Horizon, or some message or something had come
5 through. Obviously, the GLO was the big piece.
6 So I think I was basing it on that type of level
7 of detailed information.

8 **Q.** But, in the context of criminal prosecutions,
9 isn't that the wrong way round? It is for the
10 prosecution to prove the guilt of someone, not
11 for them to prove their innocence?

12 **A.** Yes, that ...

13 **Q.** You go on:

14 "I dealt with a number of people who
15 admitted their dishonesty and so the integrity
16 of Horizon was not at the forefront of my mind.
17 The business message was consistent that Horizon
18 was robust so there was never any doubt in my
19 mind."

20 Who was the business message that Horizon
21 was robust coming from?

22 **A.** It was obviously within our Security Team, you
23 know, John Scott, and it was -- it just seemed
24 to be the business message. I think there was
25 other people, other Senior Managers, you know,

66

1 **A.** I think that email you showed where I sent the
2 four links, I think that was my point of seeing
3 these things and being -- you know, passing it
4 on. But, as for challenging the business ethos,
5 I don't know how I would have done that and I've
6 certainly -- I wouldn't have done that, and
7 I didn't, obviously.

8 **Q.** Regardless of what the business message was, you
9 were under a duty as an Investigator to pursue
10 reasonable lines of inquiry, weren't you?

11 **A.** Yes.

12 **Q.** What was a reasonable line of inquiry was your
13 call, wasn't it, nobody else's?

14 **A.** Yes.

15 **Q.** So would you accept that reassurance from the
16 business about Horizon could not have justified
17 a decision not to pursue an otherwise reasonable
18 line of inquiry?

19 **A.** Yes.

20 **Q.** Could we have on screen, please, document
21 reference POL00141218. This is an email from
22 Andrew Daley, dated 5 July 2010, forwarding to
23 you and others an email from Jane Owen below,
24 dated 2 July 2010, and there are a number of
25 other emails beneath hers. The subject is

68

1 "Duplication of Transaction Records in ARQ
2 Returns", and this is a document you comment on
3 at paragraph 61 of your statement to the
4 Inquiry.

5 Ms Owen's email reads as follows, scrolling
6 down a little, please:

7 "Dear Both ..."

8 The original recipients being Jason Collins
9 and Andrew Daley:

10 "Please see email below from Penny Thomas.

11 "Mark, Alan Simpson and myself have had
12 a conference call today to look at potential
13 problems that this is likely to cause. Firstly
14 the suggested workaround will need to be put to
15 our Legal Team and until that has been agreed
16 any further ARQ requests, including those which
17 have already been submitted, will be suspended.

18 "There are 2 cases currently with the
19 court -- West Byfleet and Porters Avenue and
20 I will speak to Lisa and Jon about these as we
21 need to know what in the way of ARQs and the
22 corresponding statements have been presented to
23 court. In addition I have identified the
24 following offices from the casework spreadsheet
25 as ones that potentially could have already had

69

1 subpostmasters were raising concerns about the
2 integrity of the Horizon system, did it occur to
3 you, looking at this, that they might be right,
4 that there might be a problem, not just with the
5 ARQ data produced to support prosecutions but
6 with the integrity of the Horizon data itself?

7 **A.** Probably not. Again, I'm going back to thinking
8 back then, not from, you know, hindsight. And
9 this was an ARQ -- potentially an ARQ issue but
10 the Horizon data was -- you know, its integrity
11 was intact. I think that was the thought.

12 **Q.** I'd like to go back, please, to your involvement
13 in the investigation and prosecution of Allison
14 Henderson and we touched on an email about that
15 case earlier.

16 Could we have on screen, please,
17 paragraph 79 of Mr Knight's statement to the
18 Inquiry. It's page 29. At paragraph 79, you
19 say this:

20 "In order to progress the investigation, the
21 next step was to interview Ms Henderson. The
22 timing of the interview is down to the Lead
23 Investigator. It was standard procedure to have
24 a second officer at all interviews. In this
25 case it was my colleague Mr Paul Whitaker.

71

1 information presented to the court. Could you
2 please confirm whether or not this is the case
3 and also whether there are any I have missed as
4 Fujitsu will need to take corrective action."

5 On the face of things, this email is
6 expressing concern, is it not, that inaccurate
7 data may have been presented to the court in
8 support of prosecutions?

9 **A.** Yes, it is, ARQ, yeah.

10 **Q.** Was it your understanding, based on what you say
11 in your statement, that the issue affected the
12 integrity of ARQ data provided by Fujitsu?

13 **A.** That's what I put in my statement. That's --
14 I don't recall this but that's, I think, how
15 I understood it, that when it was -- yeah,
16 however it was taken off the main system, that
17 something had happened with the duplication.

18 **Q.** Did this concern you or, if you can't recall,
19 would it have concerned you at the time that
20 incorrect data might have been provided to the
21 court in support of prosecutions brought by the
22 Post Office?

23 **A.** Well, yeah, any -- anything that's not correct,
24 yeah.

25 **Q.** In circumstances where an increasing number of

70

1 I can see that in Ms Henderson's witness
2 statement she states, 'I was allowed to bring my
3 Federation rep, but he was not allowed to speak
4 during the interview'. As part of PO rules
5 a person being interviewed can have someone from
6 the union present. This is only to act as
7 an observer. They are told at the start of the
8 interview of their role. They may be permitted
9 to speak if it helps facilitate the interview."

10 Can you help with the circumstances in which
11 it might facilitate the interview if a union
12 representative was allowed to speak?

13 **A.** I'm having -- relating an occasion, trying to
14 explain -- if I'm trying to talk about
15 a transaction or something like that, and maybe
16 I'm not explaining it how the postmaster would
17 understand it, and maybe if the Federation rep
18 can sort of see past my confusion or whatever,
19 is to just facilitate it.

20 **Q.** You go on at paragraph 80 to say this:

21 "Disclosure would only be made to
22 a solicitor not the suspect so that the
23 solicitor could advise their client."

24 Do you mean by this that pre-interview
25 disclosure would only be provided if someone was

72

1 represented by a solicitor?

2 **A.** Yes, we would only give the disclosure to

3 a solicitor.

4 **Q.** Who was it who instructed or trained you to the

5 effect that pre-interview disclosure should only

6 be made if someone was legally represented?

7 **A.** I believe that's how I understood it to be:

8 disclosure for the solicitor.

9 **Q.** What was the reasoning behind this?

10 **A.** Just so they could advise their client.

11 **Q.** Forgive me, what was the reason for not

12 providing it, if there wasn't a solicitor?

13 **A.** Probably -- mainly probably because we were

14 talking about something that person would

15 already know, I guess. I don't know.

16 **Q.** Mrs Henderson's position in interview was that

17 she did not know what the cause of the apparent

18 shortfall was and that it was a complete shock

19 to her when the shortage was found on audit. In

20 effect, she was saying the cause of the apparent

21 shortfall was unexplained. Would you agree with

22 that, having that the opportunity to read the

23 documents?

24 **A.** Yeah, yeah.

25 **Q.** The interview took place on 11 March 2010. That

73

1 **Q.** Could we have on screen, please, paragraph 75 of

2 Mr Knight's statement. It's page 28. You say

3 here:

4 "In this case I was what was known as the

5 1st Officer or Lead Investigator. Various data

6 would have been obtained from Credence, which

7 gives the same data as ARQ but is immediately

8 accessible to download rather than having to

9 request from Fujitsu. Credence data covers the

10 3-month period prior to the current date. It's

11 also easier to read than the ARQ data as the

12 'Item Long name' is shown rather than just

13 an item ID. From Credence you can obtain

14 transactional data and event data (back office

15 items)."

16 So the data you obtained in this case was

17 Credence data not ARQ data; is that right?

18 **A.** That's correct, yes.

19 **Q.** Could we have on screen, please, POL00047155.

20 This is a memo from Rob Wilson. If we can go to

21 the bottom of that, please, and over the page,

22 so we see Rob Wilson, Head of Criminal Law.

23 Going back to the top of the first page,

24 please, it's dated 25 March 2010, and

25 Mr Wilson's memo, which is sent to the Security

75

1 was nine days after Jarnail Singh had reported

2 to you and others the result of the Darlington

3 case with the judicial comment we looked at.

4 Mrs Henderson was someone apparently completely

5 in the dark about the reasons for a shortfall.

6 Did occur to you at the time, with what you knew

7 by that point, that the Horizon data you were

8 relying on might be wrong?

9 **A.** No. It didn't.

10 **Q.** Did you consider that you were under any

11 obligation to get to the bottom of the

12 shortfall?

13 **A.** Yes, that's -- you're always looking to

14 understand what it was.

15 **Q.** You've had an opportunity to look at the record

16 of interview in Mrs Henderson's case. Your

17 questions in interview tend to suggest you were

18 convinced that Mrs Henderson was guilty of

19 theft. By way of example, you told her it was

20 difficult to believe she did not know what

21 happened to the money. Is that the case, that

22 you were convinced she was guilty of theft?

23 **A.** I believe she -- well, yeah -- of theft,

24 I believe she knew something that what she

25 wasn't telling me, but ...

74

1 Team and copied to you, reads as follows:

2 "I understand from the papers that an audit

3 discovered a shortage of just in excess of

4 £11,900 at a sub post office that was only open

5 on a limited basis.

6 "I also understand from the papers that

7 whilst the suspect would maintain that she was

8 unaware of the loss, the suspicion is that when

9 she completed the branch trading statement on

10 6 January 2010 she would have been aware of the

11 loss. Could you explain to me why she would

12 have been aware of the loss? I note there is

13 reference to a table in Appendix B which leads

14 to the suspicion that she knew of the loss.

15 I am not able to understand why it shows that

16 she would have been aware that the accounts were

17 short on that occasion.

18 "Presumably, we would be able to interrogate

19 Horizon and establish a full accounting pattern

20 for the sub office to show all transactions that

21 were conducted and therefore how much money was

22 paid out, how much was received in remittances

23 and therefore how much should have been present

24 in the account.

25 "Accordingly, I would like to understand how

76

1 it is that we can pinpoint where this loss
 2 occurred. You may think it sensible at this
 3 stage, bearing in mind it is most unlikely that
 4 she will plead guilty that we start to put
 5 together full witness [statement] and exhibit
 6 bundles."
 7 You replied to Mr Wilson on 20 April 2010.
 8 Could we have this reply on screen, please?
 9 It's POL00044501. You say here:
 10 "I believe that Mrs Henderson would have
 11 been aware of the shortage on 6 January 2010
 12 when she completed the Branch Trading statement
 13 as a discrepancy was shown in the Horizon Events
 14 log.
 15 "I have spoken to a manager at the Crown
 16 Office and she couldn't understand why such
 17 a large figure had been entered. She confirmed
 18 that the 'CASH' figures would have been entered
 19 manually and then the system produces the
 20 Discrepancy Positive or Negative entry. It
 21 would appear very strange that an 'error' was
 22 £20 different to the audit shortage discovered 4
 23 weeks later.
 24 "Circumstantial possibly but Mrs Henderson
 25 hasn't been able to offer an explanation."

77

1 "In my opinion the evidence is sufficient to
 2 afford a realistic prospect of conviction of the
 3 above named on a charge of theft as set out on
 4 the attached Schedule. I have not drafted
 5 a commencement date in the theft as I am not
 6 clear when we are saying the losses started.
 7 Can you fill in such a date and explain to me
 8 your rationale for relying on this particular
 9 date.
 10 "Bearing in mind Mrs Henderson's explanation
 11 in relation to the loss, it does not seemed
 12 appropriate to consider false accounting
 13 charges. It would be helpful if we could obtain
 14 some evidence to refute the possibility that the
 15 money she alleges must have gone missing was
 16 not, in fact, in the account during the last
 17 accounting period prior to the audit."
 18 He requests some further evidence in this
 19 memo. Going over the page, please, at 4 he
 20 says:
 21 "Reference is also made in the report at
 22 page 27 to the initial entry for £6,967.28. The
 23 paragraph goes on to explain that the other cash
 24 figure of 11,970.69 was probably a discrepancy
 25 shown which has been re-input to achieve a zero

79

1 Then two paragraphs down, you say this:
 2 "If Mrs Henderson is to be believed and the
 3 BT was correct on 6 January 2010 she lost nearly
 4 £12K in 5 weeks to 10 February 2010. Then
 5 factor in that she is open two full days and two
 6 half days, so in essence three (3) full days.
 7 The £12K loss has occurred in 15 days. The
 8 largest transaction in that period was a Post
 9 Office Card Account withdrawal for £400."
 10 Just above that, we can see your sentence
 11 here:
 12 "I hope you feel we can continue with
 13 charges(s) of theft and false accounting."
 14 Was it usual for you to express hope that
 15 the Criminal Law Team would advise in favour of
 16 charges?
 17 **A.** I think that's probably badly written on my
 18 part, for how it comes across. I think it was
 19 more of a -- that I've answered your questions
 20 and we can progress. It wasn't anything
 21 malicious or anything of that nature.
 22 **Q.** Could we have on screen, please, POL00047159.
 23 This is the Criminal Law Team's advice dated
 24 21 May 2010 from Rob Wilson, who says this in
 25 the first two paragraphs:

78

1 balance. Could this theory also be explained in
 2 the form of a witness statement producing all
 3 documents that establish the theory. In other
 4 words, the prosecution really need to try to
 5 prove that the thefts in this case took place
 6 over a period of time in circumstances where the
 7 defendant must be the thief as she is the only
 8 person who has access to the cash at the Post
 9 Office."
 10 A further memo was sent by Mr Wilson on the
 11 19 August 2010. Could we have that on screen,
 12 please. It's POL00055189. This is sent direct
 13 to you and it reads as follows:
 14 "The above-named entered a not guilty plea
 15 in relation to the current charge. The charge
 16 has been amended to read between 1 January 1997
 17 and 10 February 2010. Clearly, this cannot be
 18 the full period of the fraud and no doubt some
 19 indication as to the beginning date will be
 20 given in due course.
 21 "The prosecution are now required to prepare
 22 the witness [statement] and exhibit bundles and
 23 serve the disclosure evidence. I would be
 24 grateful if the statements as outlined in my
 25 advice of 21 May could be obtained. In addition

80

1 to those statements, it would be helpful to
2 understand why the audit took place on
3 10 February.

4 "I am sure that this case will be one of
5 those cases where the Horizon evidence will be
6 challenged and in due course I expect we will
7 need to obtain expert evidence from Mr Jenkins
8 of Fujitsu."

9 So Mr Wilson was flagging that this may be
10 a case where Horizon evidence was challenged,
11 wasn't he?

12 **A.** Yes.

13 **Q.** At this stage, there was still some doubt,
14 wasn't there, as to the date period in relation
15 to the alleged theft or fraud?

16 **A.** Yes.

17 **Q.** Could we have on screen, please, POL00055314.
18 This is a memo dated 29 September 2010, to you,
19 again from Rob Wilson. In the third and fourth
20 paragraphs, Mr Wilson says this:

21 "The current charge covers a period from
22 1 January 1997 to 10 February 2010. Is there
23 any indication from the Horizon documentation,
24 the defendant's bank statements, or any other
25 material, when this money first went missing?"

81

1 why it wasn't obtained.

2 **Q.** Going back, please, to the email from Mr Wilson
3 dated 17 November 2010. Could we have that back
4 on screen, please. It's POL00055783.

5 This is the email we looked at a little
6 earlier and we looked at the first two
7 paragraphs there. In the last paragraph here:

8 "Clearly if there were to be a plea to false
9 accounting but on the basis that the Horizon
10 system was at fault that would not be
11 an acceptable basis of plea for the
12 prosecution".

13 Looking at the email below this, this is Rob
14 Wilson to Dianne Chan, the day before on
15 16 November, he says:

16 "Dianne

17 "Have spoken to defence solicitor who
18 indicated that the defendant may be filling to
19 plead to false accounting and pay money back.
20 Taken instructions from Chris who has confirmed
21 that he would be happy to proceed on this
22 basis."

23 Is the "Chris" there a reference to you?

24 **A.** I would guess it is.

25 **Q.** Did you form any view at the time about the

83

1 Can you confirm when the last audit took place
2 so that if necessary that date can actually
3 appear in the indictment?

4 "At the moment I suspect that this will be
5 a case where Horizon itself is challenged and,
6 as such, the Prosecution will be under pressure
7 to disclose a huge amount of Horizon data. It
8 would therefore be extremely useful if we could
9 identify something that assists the prosecution
10 in the pursuit of this criminal allegation."

11 So it appears, even at this late stage, that
12 nobody could pinpoint when the alleged loss
13 first occurred; is that right?

14 **A.** Yes.

15 **Q.** Given all the doubt over the date in this case,
16 did it not occur to you that you should seek
17 further data from Fujitsu?

18 **A.** Yes, I presume it would.

19 **Q.** Why didn't you?

20 **A.** I don't know. I can't recall that.

21 **Q.** Did it not concern you, as an investigator, that
22 a theft charge was proceeding when nobody could
23 say when or how the loss occurred?

24 **A.** Yeah, it would have done, asking that -- he's
25 asking that question, I don't recall the reason

82

1 appropriateness of making a guilty plea to false
2 accounting, contingent upon Mrs Henderson not
3 making reference to her belief that the
4 discrepancies were as a result of the Horizon
5 system?

6 **A.** That -- the wording of that, "taken instructions
7 from Chris, who has confirmed he would be happy
8 to proceed on the basis", I don't know how --
9 why that's written like that, because he
10 wouldn't have taken -- wouldn't have taken
11 instruction from me on anything. So I'd have to
12 query the meaning of that sentence.

13 **Q.** Could we have on screen, please, document
14 reference POL00019111. This is a case file
15 event log and it relates, this time, to Alison
16 Hall's case. Was this event log completed by
17 you?

18 **A.** I believe -- yes, it was.

19 **Q.** There is an entry in it on 30 June 2011, if we
20 can scroll down, please. You say here:

21 "Phone call from Adrian Chaplin, Barrister,
22 while at Leeds Crown Court. Asked if we'd
23 accept False Accounting. I said we would but
24 nothing mention against Horizon."

25 This is your note in which you say the plea

84

1 was okay but nothing mentioned against Horizon.
 2 You deal with this in your statement at
 3 paragraph 107, if we could have that on screen,
 4 please. It's page 37. You've dealt with this
 5 earlier in this paragraph but, as a point of
 6 general principle, about halfway down this page
 7 you say:

8 "I have never had any involvement in making
 9 a plea deal or applying conditions to such
 10 a deal and this would be outside of my remit as
 11 an Investigator."

12 Does that remain your position,
 13 notwithstanding the case event log that we've
 14 just looked at?

15 **A.** Yes, because that case -- what I'm saying here,
 16 I've never had involvement in -- I think I'm
 17 trying to explain that case log, that I would
 18 have been passing on a message because counsel
 19 had phoned me. I wouldn't have been giving
 20 instructions, it would be more so passing on
 21 a message because I wouldn't have been involved
 22 in plea deals or conditions of any sort.

23 **Q.** You have referred a number of times to the
 24 business line in relation to Horizon. In
 25 relation to your own involvement, particularly

85

1 **Q.** I am going to say something --

2 **A.** Oh, sorry.

3 **Q.** -- for the document management team. If we can
 4 bring it up at page 2 at the very end, we can
 5 see where the email trail starts, and you can
 6 see there we start with a request from Simon
 7 Baker dated on 9 June 2013. I'll take it very
 8 quickly there. It's about a Spot Review, which
 9 we understand were exercises that were conducted
 10 during the Second Sight review, so not something
 11 we'd have expected you to see at the time.

12 **A.** Right.

13 **Q.** If we can scroll up, we see a reply to that
 14 email from Dave Posnett and, at the bottom of
 15 page 1 you can see the start of that. You see
 16 Dave Posnett replies on 10 June 2013.

17 **A.** Yes.

18 **Q.** What I want to look at, if we can scroll on to
 19 the next page, it's first two paragraphs or
 20 three paragraphs there. If you can read that to
 21 yourself, I'll read it for the record.

22 "I've read the associated document and
 23 I would say there were issues ... the
 24 scratchcard process worked but some SPMRs
 25 [subpostmasters] had trouble getting to grips

87

1 in the cases of Mrs Hall and Mrs Henderson, do
 2 you feel any responsibility for what happened to
 3 those two subpostmistresses?

4 **A.** I was the Investigator, so I guess that would be
 5 part of it, yes.

6 **MS PRICE:** Sir, those are all the questions I have
 7 for Mr Knight. Do you have any questions before
 8 I turn to Core Participants?

9 **SIR WYN WILLIAMS:** No, thank you, no.

10 **MS PRICE:** Ms Patrick has some questions.

11 **SIR WYN WILLIAMS:** Certainly.

12 **Questioned by MS PATRICK**

13 **MS PATRICK:** Mr Knight, my name is Angela Patrick.

14 I act with Mr Moloney KC for a number of
 15 subpostmasters who were prosecuted and who have
 16 subsequently had their convictions quashed. We
 17 act including for Ms Henderson and Ms Hall, who
 18 sits next to me today.

19 I want to ask you about two topics and the
 20 first is about a document which is at
 21 POL00136717. This isn't a message that we'd
 22 have expected you to see at the time, I just
 23 want to ask you about it. If we can start at
 24 page 2.

25 **A.** Excuse me, nothing has come up.

86

1 and understanding it. The volume of TCs [which
 2 we know are transaction corrections] across the
 3 network were, I recall, a concern. I owned
 4 Scratchcards as a fraud risk programme when
 5 I was Fraud Risk Manager up until around
 6 May 2010. The problem was that scratchcards
 7 were the only product which wasn't simply remmed
 8 in and then sold. Instead, they had to be
 9 accepted on the Lottery Terminal as received and
 10 then activated as and when required on the
 11 Lottery Terminal and remmed in on Horizon when
 12 activated, then sold, and then prizes/stock
 13 holdings were recorded on Horizon ... as well as
 14 online sales.

15 "I ran a number of intervention/education
 16 initiatives and associate a zip file of two such
 17 initiatives (1 & 2) ... both of which featured
 18 Hightown ... "

19 Now Hightown was Ms Hall's branch:

20 "... (so they weren't left to flounder as
 21 seems to be the insinuation). There are also
 22 help guides and comms articles included and
 23 I would think that POL sent out many more comms
 24 to branches and the Lottery Team made numerous
 25 TP calls each month, as well as the Ops Manual

88

1 as a point of reference in branch."
 2 He goes on:
 3 "Also in the file [and he refers to
 4 a spreadsheet]. From this data we determined
 5 branches that would be telephoned and branches
 6 that I would request an audit. If you see the
 7 'branches of concern' tab you can get a sense of
 8 the concerns around perceived scratchcard
 9 holdings. There were many audit shortages and
 10 scratchcard holding concerns seemed to highlight
 11 other problems at branches."
 12 Now, what I wanted to ask you, Mr Knight,
 13 was a few questions. This seems to suggest that
 14 there were problems known to the Post Office
 15 arising from the management of Lottery
 16 scratchcards in 2010; is that fair?
 17 **A.** That's what that seems to imply, yes.
 18 **Q.** And that those were problems that called, at the
 19 time, for initiatives and interventions on the
 20 part of the Post Office; is that fair?
 21 **A.** Yeah, that's what it seems to be saying, some
 22 sort of, yeah, clarity, yeah.
 23 **Q.** And that those initiatives included Hightown,
 24 which was Ms Hall's branch. That's recorded
 25 there in that message, isn't it?
 89

1 interview, and I'd quite like to look at
 2 page 11, please.
 3 I'd like to start at the point where there
 4 is 00.07.37, so 7 minutes and 37 seconds into
 5 the transcript, please. Sorry, if I can just
 6 catch up and check that we're all at the same
 7 place.
 8 So we see there, can you see Mr Knight, at
 9 the top of that page, you say:
 10 "okay, um, can you tell me why there's
 11 a cash shortage of £14,000 in the account?"
 12 Can you see that?
 13 **A.** Yes, I can see that.
 14 **Q.** I'm going to read that just so we can all be
 15 looking at the same thing. Mrs Hall says:
 16 "Well, I think it's all to do with the
 17 scratchers, um, I've been having problems with
 18 them for a while now, and I should have asked
 19 for help earlier on, and I didn't. Um, I can't
 20 see it being anything else. I know sometimes we
 21 get, err, discrepancies for missing giros and
 22 cheques and stuff, but I don't think it's going
 23 to add up to that amount."
 24 You go on:
 25 "Right. Right, I'll ask you another
 91

1 **A.** Yeah, yeah.
 2 **Q.** He goes on to say that there were many audit
 3 shortages and concerns which highlighted other
 4 branches.
 5 Now, this information about the education
 6 initiatives involving Hightown and that there
 7 was a known problem around scratchcards and
 8 associated audit shortages, is that something
 9 you would have known at the time you were
 10 investigating Ms Hall in 2010?
 11 **A.** I don't believe so. I don't think I've seen
 12 this document -- or aware of the content of it.
 13 **Q.** That content is all information that would have
 14 been relevant to your investigation, isn't it?
 15 **A.** It would have been, yes, it would have been
 16 relevant.
 17 **Q.** Thank you. Can we move on to the second topic,
 18 and that's Ms Hall's interview. Now, you've
 19 answered a number of questions from Ms Price on
 20 Ms Hall raising Horizon Issues and integrity,
 21 and your failure to explore that as a reasonable
 22 line of inquiry. I only want to ask you a few
 23 questions about the interview to be absolutely
 24 clear on what she said to you. Can we look at
 25 POL00021252 and that's the transcript of
 90

1 question more. You said a while."
 2 She says, "Mm.
 3 "Can you, you know, put some time frame on
 4 that?
 5 "I don't know, really. It's just probably
 6 six months.
 7 You say:
 8 "... probably six months.
 9 "Yeah.
 10 "So, are we in, let's say, beginning of
 11 September.
 12 "I think it maybe started at the beginning
 13 of the year, when it all started, um, I'm
 14 building up."
 15 Now stopping there, Ms Hall was referring to
 16 problems and she thought the problems might be
 17 about the Lottery, didn't she?
 18 **A.** Yes, that's what we were talking about.
 19 **Q.** That's just what she thought, wasn't it?
 20 **A.** Yes.
 21 **Q.** But she was raising other issues, wasn't she?
 22 **A.** Sorry, in what sense?
 23 **Q.** She's saying:
 24 "There were other problems, there's missing
 25 giros, cheques and stuff, discrepancies, it
 92

1 might not add up to that amount, but um ..."

2 She didn't know what was going on, did she?

3 **A.** Sorry, yeah.

4 **Q.** She couldn't explain the shortfalls, could she?

5 **A.** No.

6 **Q.** But she was telling you they'd been going on

7 from the start of the year and this was you in

8 September, wasn't she?

9 **A.** Yes.

10 **Q.** That was a period of more than three months,

11 wasn't it?

12 **A.** Yes.

13 **Q.** Okay. Now, if we can read on, if we go over the

14 page. Just checking you can see it.

15 **A.** Yes, I can see.

16 **Q.** At the beginning she starts:

17 "And I've been trying to rectify it and been

18 calling the helpline, the Lottery line. Just

19 trying to get everything sorted, and it's just

20 got on top of me. And I actually asked for

21 an audit myself."

22 You say, "When was that?"

23 She says:

24 "Um, I can't remember all the dates.

25 I spoke to Denise at Chesterfield, and she put

93

1 "Yeah."

2 Now, I just want to ask you a few questions.

3 Stopping there, Ms Hall was telling you she knew

4 she had problems and she wanted help, wasn't

5 she?

6 **A.** Yes.

7 **Q.** She wanted help to get to the bottom of it,

8 didn't she?

9 **A.** Yes.

10 **Q.** She'd been experiencing problems over many

11 months, hadn't she?

12 **A.** Yes.

13 **Q.** That was at around the time of the transition to

14 Horizon Online?

15 **A.** I believe so.

16 **Q.** Thank you.

17 We don't have any more questions for you,

18 Mr Knight. Thank you.

19 **MS PRICE:** Mr Jacobs has some questions, sir.

20 **Questioned by MR JACOBS**

21 **MR JACOBS:** Thank you, sir.

22 I'm going to ask you about Peter Holmes.

23 I represent him and a large number of other

24 subpostmasters who were the victims in this

25 scandal.

95

1 me in touch with another lady. I wish I'd have

2 wrote all the reference number down and I didn't

3 'cause I was just in such a state, but she --"

4 You say:

5 "That's fine. When did you phone up?"

6 She said:

7 "This is before, when I came back off, um,

8 holiday. It all started because the branch was

9 rolling over. No, not the branch, the, the

10 online, the, the, we were going online."

11 You say:

12 "Oh, you were going onto the next, yeah,

13 changing [onto] the new, the next generation,

14 yes."

15 She says, "Yeah, onto the new, new change

16 and that. So, I asked, um, I spoke to Denise at

17 Chesterfield, and she gave me another lady's

18 number to ring, and I requested an audit because

19 I wanted all this sorting out. So, I've got

20 nothing to hide, I just want it all sorting out,

21 so I can get back to my post.

22 "Right. Right, you're saying, just going

23 back. You said that it looks like it's been

24 happening from the beginning of the year, you've

25 had a problem.

94

1 You have given evidence at paragraph 69 to

2 73 of your statement in relation to the

3 prosecution of Mr Holmes and your investigation

4 of him.

5 **A.** I can't see anything. I don't know if you're

6 showing me something, sorry.

7 **Q.** Okay, perhaps if we could turn that up.

8 WITN08290100. That's your witness statement,

9 and it's paragraphs 63 to 79. That's where you

10 deal with Mr Holmes' case.

11 Oh, yes, we'll locate the page number now.

12 It is 27. Thank you.

13 So you say you were involved as the second

14 officer in that case.

15 **A.** Yes.

16 **Q.** Do you recall that you attended a search of

17 Mr Holmes' family home?

18 **A.** I don't recall, I'm sorry, no.

19 **Q.** With Mr Daily, you don't recall it?

20 **A.** I don't recall it, no.

21 **Q.** You've answered questions from Ms Price about

22 what Mr Holmes said at the interview that you

23 attended? He said that he believed the Horizon

24 system may have been responsible for the alleged

25 shortfalls. He repeated his concerns of the

96

1 Horizon system during the interview and he said
2 that he was hoping that error notices would have
3 come back but he thought it was something the
4 computer had done or hadn't done. Those were
5 his words, effectively.

6 Now, his conviction, his subsequent
7 conviction, was overturned by the Court of
8 Appeal and quashed in 2021. Mr Holmes had died
9 in 2015, so it was a posthumous overturning of
10 his conviction, and the Court of Appeal found
11 that Mr Holmes' prosecution was an abuse of
12 process. They found that there was no evidence
13 to corroborate the Horizon evidence, they found
14 there was no investigation into the integrity of
15 the Horizon figures and they found that there
16 was no proof of any actual loss to the Post
17 Office.

18 Now, can we look at paragraph 73 of your
19 statement, so just scrolling down, please.
20 Page 28, thank you. You say:

21 "The Inquiry has asked me for my reflections
22 on the way the investigation and prosecution of
23 Mr Holmes was conducted ... with regard to the
24 Court of Appeal judgment ..."

25 I have just given you the findings of the
97

1 involved in any other part of it.

2 **Q.** Well, I appreciate, of course, that you were the
3 second officer and we're going to be asking very
4 similar, if not the same, questions of Mr Daily
5 who was the primary interviewing officer?

6 **A.** Right.

7 **Q.** But surely, as an investigating officer, present
8 and in attendance at that interview, when
9 a subpostmaster, as so many others did, was
10 making these claims, wouldn't that, as
11 an Investigator, at least raise a few red flags
12 in your mind and wouldn't you have said, or
13 ought to have properly said, "Well, surely we
14 should look into this?" even though, as you say,
15 you weren't leading the investigation.

16 **A.** Yeah, I appreciate what you're saying. It's
17 a very difficult question to answer, really,
18 because, as I said to Ms Price, it's -- from
19 what -- where we are now, looking back then,
20 I don't think there was anything of that -- that
21 there wasn't a process in place to sort of raise
22 it and discuss it, if that makes sense.
23 Probably not a very good answer, I apologise.

24 **Q.** No, I can see what you're saying. You're saying
25 that there wasn't a set procedure --

99

1 Court of Appeal. You say, from what you recall,
2 you did not have any concerns with the way the
3 investigation was run at the time as second
4 officer.

5 The question that we ask you, on behalf of
6 Marion Holmes, who is the widow of Peter Holmes,
7 is: surely you must have been concerned when you
8 were aware of this outcome from the Court of
9 Appeal that Mr Holmes had repeatedly challenged
10 the Horizon system and it was not investigated.
11 Why didn't you, as an Investigating Officer,
12 investigate the issue that Mr Holmes had raised
13 repeatedly at his interview?

14 **A.** I was the second officer, so I was literally
15 there on the day. I wasn't investigating the
16 case. I was there on the day to be a second
17 person for safety and other reasons, to
18 facilitate the interviews and searches, and such
19 like. So I was going by that, you know, and,
20 obviously, the case had been prosecuted so
21 I hadn't -- subsequently, obviously, having seen
22 the overturned and the reasons for that, then
23 that was that.

24 But, at the time, I believed it was -- from
25 the bits I saw, that was fine. I wasn't

98

1 **A.** Yeah, it wasn't like a forum --

2 **Q.** -- for looking into allegations that
3 subpostmasters made.

4 **A.** Mm.

5 **Q.** Surely that's part of the investigating function
6 though, to follow things through?

7 **A.** Yes, it would be.

8 **Q.** Right. The final question in relation to
9 Mr Holmes is, with the benefit of hindsight, now
10 you know what the Court of Appeal said, do you
11 accept that Mr Daily and you failed properly to
12 investigate Mr Holmes' case in light of what he
13 said at interview?

14 **A.** It sounds like I'm trying to cop out, I'm not.
15 I was second officer, I was literally there on
16 the day so, yes, I appreciate, as you've just
17 said, what I would have heard, and no action.
18 What Mr Daily did, I'm not fully aware. So
19 that --

20 **Q.** Well, perhaps I'll put it in a different way.

21 As the second officer, do you accept that you
22 should have done more to ensure that this case
23 was properly investigated?

24 **A.** In hindsight, but, as the process was back then,
25 a second officer was just there on the day.

100

1 Sorry if that's --

2 **Q.** All right, well, I'll move on. I want to ask

3 you about Rita Threlfall, and Ms Price has asked

4 you about your involvement in her interview.

5 **A.** Mm-hm.

6 **Q.** If I could perhaps ask you just to refresh your

7 memory to go to the -- if we could ask -- if we

8 could go to the document POL00107683, and it's

9 page 3 of 9. This is the document Ms Price took

10 you through, it's the investigation report of

11 Ms Threlfall.

12 **A.** Oh, right.

13 **Q.** 3 of 9, please. I think we can see that it

14 says:

15 "... I interviewed [and this is Mr Bradshaw

16 writing this] Ms Rita Threlfall at the Liverpool

17 North Office, Crown Street Liverpool ... Present

18 throughout the interview was Mr Christopher

19 Knight, Fraud Investigator."

20 That interview took place on 10 March 2011

21 and you confirmed you were there and present at

22 that interview.

23 **A.** Yes.

24 **Q.** Now, can we turn to the witness statement of

25 Ms Threlfall and I'll give you the reference for

101

1 **Q.** It's quite striking, isn't it, that a disabled

2 lady, who is wheelchair dependent, has

3 an interview arranged up a staircase that she

4 cannot access and is transferred to the

5 interview room in a tiny parcel lift. Surely

6 that is something that you ought to have

7 remembered?

8 **A.** I don't. I don't remember it. Now, I would

9 imagine when we interviewed -- and I'm speaking

10 sort of generically, if that makes -- if we

11 interviewed people, then we would find

12 a location and I don't know whether -- was this

13 at a Royal Mail site?

14 **Q.** She says Liverpool --

15 **A.** Mail -- Sorting -- Post Office.

16 **Q.** -- sorting --

17 **A.** Yeah, it would be a Royal Mail Sorting Office.

18 So that would have been a room within that

19 building. I'd imagine, as a sorting office, the

20 ground floor would be where they're doing their

21 sorting, so this would have been up there.

22 I didn't arrange it, so Mr Bradshaw did.

23 And talking about the tiny parcel lift,

24 knowing Royal Mail buildings, it would be

25 a lift. It would be a working -- not

103

1 that, it is WITN02360100. Page 7 of 15, please.

2 I should make it clear, this isn't a document

3 that you've seen previously.

4 **A.** Okay.

5 **Q.** If we could go, please, to paragraph 49. So we

6 can see, in fact starting at 48 -- I should say

7 that Ms Threlfall is wheelchair dependent and

8 disabled. She says:

9 "Upon arrival they left my husband and me in

10 a hallway, we asked for a chair and never

11 received one. I ended up having to sit down on

12 the stairs.

13 "The interview room was upstairs and I told

14 them there was no way I could make it up the

15 stairs. In order to make it to the interview

16 room I was placed in a tiny parcel lift."

17 Now, Ms Threlfall is watching this hearing

18 today. She was going to give evidence in the

19 Human Impact part of the Inquiry but was too

20 upset to do so and so on 23 February 2002

21 Mr Stein, King's Counsel read a summary of her

22 statement to the Inquiry. Do you recall this

23 treatment of my client?

24 **A.** I don't, I'm afraid, no. I don't recall any of

25 the -- that day.

102

1 a passenger lift, as it were, it would be

2 a working lift. I don't know the size of it so

3 it might have appeared to be a bit rough and

4 ready not a -- as you would imagine a lift being

5 in a superstore or whatever.

6 **Q.** Well, her evidence, and this evidence is that

7 has been received by the Inquiry, is that it was

8 a tiny lift, it was inappropriate. She is still

9 shaken by that experience. She says in her

10 evidence that she suffers from crippling anxiety

11 and depression. Do you think this is any

12 appropriate way to treat a disabled person who

13 you're investigating, or at all?

14 **A.** It's not -- no, taking this aside, everybody

15 should be treated fairly. So I don't know the

16 circumstances of how -- what this lift was, tiny

17 in comparison to what? You know, and all I'm

18 going by what I'm reading here is, if you go

19 into a first floor and there's a lift, then that

20 would be the lift.

21 **Q.** Well, given that she says it is a tiny parcel

22 lift --

23 **A.** I can't argue either way. I don't know.

24 **Q.** You're still a current employee with Post

25 Office.

104

1 A. Yes.

2 Q. Would Post Office put a disabled person into
3 such a lift today?

4 A. Probably not but I don't know what lifts --
5 whatever lift we had today, if we had a lift and
6 somebody is going up to another floor, we would
7 go in that lift. Over my years within the
8 business, I've been in some -- some buildings
9 had very old lifts with the old shutter, the
10 concertina shutter you pull across and then that
11 would go, whereas now they're more modern. So
12 I can't comment on what this was.

13 Q. If we can then go back to the statement, which
14 is still on the screen, paragraph 50,
15 Ms Threlfall says that she was interviewed under
16 caution. She says the interviewer was
17 horrendous, she had a solicitor with her and she
18 provided a no comment interview on advice.

19 Then scrolling down very slightly please,
20 paragraph 52. She says:

21 "At the end of the interview the Post Office
22 Investigator turned off the tape and the chap
23 turned to me and said 'Do you wear a watch,
24 I said yes and can I see your earrings and
25 rings, and, what are the colour of your eyes',

105

1 questions you'd have to go through. So that
2 sounds to me that that is what is taking place
3 there, although she's not possibly describing
4 it. She's describing how she took it but that's
5 what I would suggest is taking place.

6 Q. Mrs Threlfall, who is watching today, says that
7 she believes -- in her words that she's used to
8 us today, she believes that she was deliberately
9 persecuted and the question I have for you is:
10 was there a strategy or a tactic employed by
11 Investigators to unsettle or unnerve or
12 intimidate subpostmasters and subpostmistresses
13 under investigation to exert pressure upon them
14 during interviews and in the investigating
15 process?

16 A. No, not at all. Not --

17 Q. Do you accept from Ms Threlfall's evidence that
18 that is exactly what we see happening here?

19 A. It's her feelings, so I can't argue with how she
20 feels. So if she's saying she felt like that
21 then I would have to accept that. But I don't
22 believe that was how it was delivered.

23 Q. Mrs Threlfall says the only motive for treating
24 her in this way was to unsettle her, belittle
25 her, humiliate her and that was what Mr Bradshaw

107

1 so I responded and he said in a joking manner
2 'Good so we've got a description of you for when
3 they come'. It was so awful I nearly fell to
4 the floor when he said that. I couldn't believe
5 what I had heard."

6 Now, it was Mr Bradshaw who was the Lead
7 Investigator?

8 A. Yes.

9 Q. Do you recall these comments being made?

10 A. As I said, I don't but I could give you
11 an explanation of what I believe was taking
12 place. Following an interview and, again, I'm
13 not talking about this specifically, I'm talking
14 about all interviews, we have to fill a form out
15 called a NPA01, Non-police Prosecution
16 Authority 01 form and, on that form, there's
17 lots of questions and it's basically identifying
18 a person.

19 I think it mirrors -- if you get arrested by
20 the police you go into custody and they take
21 your fingerprints, so I think it mirrors that.
22 So basically, you'd have your name, da, da, da,
23 and then it would be: male, female; left-handed
24 or right-handed; scars, tattoos, distinguishing
25 marks; build; and there would be various

106

1 was doing and you were involved in that as the
2 Second Investigator?

3 A. I don't believe that at all. I don't believe
4 that at all because, if you're interviewing --
5 it's putting somebody at ease rather than
6 putting them on the -- you know, aggravating
7 them.

8 Q. I'm going to ask to see if I have any more
9 questions.

10 Mrs Threlfall was originally prosecuted for
11 false accounting and theft, the Post Office
12 dropped the charges and she was formally
13 recorded as not guilty, as a verdict. She's
14 watching today. As someone who was involved in
15 her investigation, do you have anything that
16 you'd like to say to her now?

17 A. There was -- well, as far as -- I don't remember
18 it but would say there was nothing, as you've
19 said there, malicious.

20 Q. Are you sorry for the way she was treated?

21 A. If that's how she felt she was treated, then
22 that's not nice for her.

23 Q. Are you sorry for how she was treated or are you
24 sorry --

25 A. I don't know --

108

1 Q. -- if that's how she felt she was being treated?

2 A. I don't believe -- I wouldn't have treated
3 anybody disrespectively (*sic*) so, if she felt
4 like that, then that's -- you know, I'm sorry
5 that she feels like that, but --

6 MR JACOBS: Thank you. I haven't any further
7 questions for you?

8 SIR WYN WILLIAMS: Anyone else?

9 MS PRICE: Sir, I think those are all the questions
10 from Core Participants.

11 SIR WYN WILLIAMS: All right, thank you.

12 I hope that Ms Hall and Mrs Threlfall have
13 found today's proceedings informative.

14 Thank you very much for making a witness
15 statement and for coming to give evidence,
16 Mr Knight. I'm grateful to you.

17 Where do we go from here, Ms Price?

18 MS PRICE: Sir, if we can come back at 2.00 for this
19 afternoon's witness, please, if we take lunch
20 now.

21 SIR WYN WILLIAMS: Fine, all right.

22 MS PRICE: Thank you.

23 (12.57 pm)

(The Short Adjournment)

24 (2.00 pm)

109

1 involvement in the case study of Angela Sefton
2 and Anne Nield.

3 First, I'd like to ask you some questions
4 about your professional background. Is it
5 correct that you joined the Post Office in 1985
6 as a counter clerk?

7 A. It is, yes.

8 Q. Is it correct that you are still employed by the
9 Post Office?

10 A. I am.

11 Q. Is it fair to say that you've had a varied
12 career, over almost 38 years you've been working
13 for the Post Office?

14 A. Very much so, yes.

15 Q. I just want to ask you about some of the roles
16 that you've held. Is it right that in 1997 you
17 became a National Field Trainer?

18 A. I did, yes.

19 Q. Do you remember the Horizon system being rolled
20 out during the time you held that role?

21 A. I'm not sure whether it was before I held that
22 role or -- I'm not sure exactly the date it was
23 rolled out. But I did use Horizon in that role,
24 yes.

25 Q. Were you involved in training subpostmasters to

111

1 MS MILLAR: Good afternoon, sir. Can you see and
2 hear me?

3 SIR WYN WILLIAMS: Yes, I can, thank you.

4 MS MILLAR: May we please call Mr Ryan.

5 KEVIN JAMES RYAN (*affirmed*)

6 Questioned by MS MILLAR

7 MS MILLAR: Could you please confirm your full name
8 Mr Ryan?

9 A. It's Kevin James Ryan.

10 Q. You should have in front of you a witness
11 statement, which is dated 16 November 2023. If
12 you turn to the last page of that, which is
13 page 44, is that your signature?

14 A. It is.

15 Q. Are the contents of that statement true to the
16 best of your knowledge and belief?

17 A. They are.

18 Q. For the purposes of the transcript, the URN is
19 WITN08950100. My name is Megan Millar and, as
20 you know, I will be asking you questions today
21 on behalf of the Inquiry.

22 I'm going to be asking you about issues
23 which arise in Phase 4 of the Inquiry, focusing
24 on your involvement as an Investigator in the
25 Security Team and, in particular, your

110

1 use Horizon?

2 A. Yes, that was part of the training.

3 Q. From 2005 to 2006, you were an Area Intervention
4 Manager; is that right?

5 A. Yes.

6 Q. Can you please give a brief description of what
7 that role entailed?

8 A. It was dealing with issues raised via a number
9 of sources, branch support, the helpline, Retail
10 Line Managers. I worked for a Retail Line
11 Manager and they would send me issues in
12 a branch, could be anything from customer
13 complaints, and it would be a case of trying to
14 resolve any issues in branches for the Retail
15 Line.

16 Q. In April 2010, you were appointed a Horizon
17 Migration Manager for a short time until August
18 2010?

19 A. Yes.

20 Q. Is that right? At the end of 2010, is it right
21 that you were initially going to take redundancy
22 but you then saw the Security Team advertising
23 vacancies and decided to apply?

24 A. Yes.

25 Q. What motivated you to apply for a job in the

112

1 Security Team at that point?
 2 **A.** I wanted to stay in the Post Office.
 3 Unfortunately, the role I'd previously had as
 4 sales manager wasn't something that I enjoyed,
 5 so I decided to leave rather than continue in
 6 that role. When the Security Manager role came
 7 up I thought it was appropriate to my skillset,
 8 so I applied for it.
 9 **Q.** Is it then correct that you joined the team as
 10 a Security Manager in January 2011?
 11 **A.** Yes.
 12 **Q.** For a six-week period in July 2013, did you
 13 temporarily step up in a Security Team Leader
 14 role?
 15 **A.** Yeah, the team leader that was my team leader
 16 left the Post Office and I was asked to stand in
 17 temporarily until they either appointed somebody
 18 or, due to restructure, they were not going to
 19 replace that person, so they would shrink the
 20 team -- the number of Team Leaders, sorry.
 21 **Q.** Who was that, who was your team leader?
 22 **A.** At that point it was Keith Gilchrist.
 23 **Q.** Moving on then, please, to the structure of the
 24 Security Team. Is it correct that when you
 25 joined in 2011 the physical Security Team and

113

1 **Q.** Then when you became a Team Leader temporarily
 2 in 2013 you reported to the Senior Security
 3 Manager, who you remember being Andy Hayward?
 4 **A.** Yes.
 5 **Q.** When you were a Team Leader, is it correct then
 6 that you had three or four Security Managers
 7 reporting to you?
 8 **A.** Yeah, it may have been five, I'm not exactly
 9 sure of the number.
 10 **Q.** The Security Managers you recall reporting to
 11 you were Mike Stanway, Steve Bradshaw and Robert
 12 Daily; is that right?
 13 **A.** Yes.
 14 **Q.** You explain at paragraph 11 of your statement
 15 that you don't recall providing any in-depth
 16 supervision to those Security Managers; is that
 17 right?
 18 **A.** Not a great deal, no. That I can recall -- and
 19 I've checked with Post Office HR -- I think
 20 I was only in the role for about seven weeks,
 21 maybe a little bit longer. So really speaking,
 22 it was literally just a stopgap to fill a role
 23 while a replacement was sourced.
 24 **Q.** But you did remember doing some of their
 25 performance reviews and conducting one-to-ones

115

1 the Fraud and Crime Investigation Team emerged?
 2 **A.** Yes.
 3 **Q.** At that time there were three teams responsible
 4 for three regions in the UK --
 5 **A.** Yeah.
 6 **Q.** -- north, Midlands and South; is that right?
 7 **A.** Yeah.
 8 **Q.** Each time at that point had approximately 18 to
 9 20 Security Managers; is that right?
 10 **A.** I think so, yes. I can't exactly remember the
 11 numbers too clearly but it was larger than the
 12 team is currently.
 13 **Q.** You explain in your statement that, over the
 14 years, the size of the team has decreased, so
 15 now there are eight Security Managers and one
 16 Team Leader in total?
 17 **A.** Yes.
 18 **Q.** You've told us that when you became a Security
 19 Manager you reported to a team leader; is that
 20 correct?
 21 **A.** Yeah.
 22 **Q.** The team leaders you remember were Leslie
 23 Frankland, Keith Gilchrist, Simon Hutchinson,
 24 Helen Dickinson and Simon Talbot; is that right?
 25 **A.** Yes.

114

1 and meetings; is that right?
 2 **A.** Yeah, it was one-to-ones, yeah, some one-to-ones
 3 with some of them.
 4 **Q.** You go on later in your statement at
 5 paragraph 28 to explain that Team Leaders
 6 regularly provided supervision to Security
 7 Managers conducting criminal investigations.
 8 Did you provide it in that respect?
 9 **A.** No, I didn't really have the experience, so
 10 anything to do with the fraud side of things was
 11 done by one of the other Team Leaders because
 12 I was only standing in and I'd only been there
 13 in the team for just over two years. I didn't
 14 really have the experience to supervise on
 15 fraud.
 16 **Q.** So one of the other team leaders managed the
 17 Security Managers reporting to you in respect of
 18 fraud; is that correct?
 19 **A.** Yes.
 20 **Q.** Who was that?
 21 **A.** I seem to think it was a lady by the name of
 22 Sharron Logan but I'm not 100 per cent sure on
 23 that.
 24 **Q.** Can we, please, have a document with the
 25 reference POL00127137 on screen, please. This

116

1 is a one-to-one meeting record between you and
2 your line manager at the time, Simon Hutchinson.
3 At page 2, if we can have a look at that,
4 please, at the bottom of the page, the very
5 bottom of the page, I think it's a comment from
6 you saying:

7 "Glad to be back in my old role and area and
8 a job I enjoy. Team Leader role was simply not
9 for me but will fully support Simon in that
10 role."

11 Can you explain why you didn't think that
12 the Team Leader role was for you?

13 **A.** Throughout my career I've been working in the
14 field, being a desk job, I just didn't feel
15 comfortable with it, so -- and also there's the
16 pressures that were on that role at the time.
17 I just wanted to get back to doing what I know.

18 **Q.** Moving on, then, to the training you received
19 when you joined the Security Team. That
20 document can come down. Thank you. In your
21 statement you say that when you joined the
22 Security Team, you'd been working for the Post
23 Office for 26 years but you hadn't gained any
24 experience of investigations; is that correct?

25 **A.** Yes.

117

1 those areas.

2 "Additionally training was provided in
3 respect of RIPA, Safe Systems of Work and PORA
4 ..."

5 What do you understand that to be
6 a reference to?

7 **A.** I can't remember. No, I can't recall what that
8 one is.

9 **Q.** "... NPA forms, notes of interview, tape
10 summaries and offender reports."

11 Are those the things you remember being
12 covered?

13 **A.** Yes.

14 **Q.** Thank you. That can come down. You explain at
15 paragraph 45 of your statement that you believe
16 you would have learned when to seek relevant
17 evidence from third parties and about your
18 disclosure obligations through mentorship and
19 shadowing; is that right?

20 **A.** Yes.

21 **Q.** Does that mean that you don't remember receiving
22 training on those topics?

23 **A.** It was -- I would say it was probably on-the-job
24 training, so, as you were going through things,
25 the mentor would talk you through how to deal

119

1 **Q.** Did you have any knowledge of criminal law?

2 **A.** No.

3 **Q.** After you were offered the position, you went on
4 a residential training course, which lasted
5 three weeks; is that correct?

6 **A.** Yes.

7 **Q.** You remembered this training being delivered by
8 two Royal Mail Security Managers called Paul
9 Whitaker and Paul Southin; is that right?

10 **A.** Yes.

11 **Q.** Do you remember any lawyers being involved in
12 delivering this training?

13 **A.** Not in that training, no.

14 **Q.** Could we have the document reference POL00129182
15 on screen, please. So we can see that's
16 "Investigations Workshop Feedback", and is that
17 then the residential training course?

18 **A.** Yes, it looks like, yes.

19 **Q.** We can see underneath the title "Course
20 Content":

21 "The topics covered on the course enabled
22 the focus to be centred on interviewing suspect
23 offenders and witnesses, the cognitive witness
24 interview process, searching and notebook
25 entries. Detailed training was provided in

118

1 with certain things. I don't remember it
2 specifically, no.

3 **Q.** What did the mentorship and shadowing involve,
4 then?

5 **A.** Basically, initially when we started -- when
6 I started, sorry, I would only be involved as
7 Second Officers for a number of months, so
8 shadowing the mentor mostly, and then eventually
9 I'd be allocated some cases and the mentor would
10 take me from start to finish right through the
11 cases, making sure that I covered all of the
12 relevant points that need to be covered.

13 **Q.** Your mentor was Steve Bradshaw; is that right?

14 **A.** It was, yes.

15 **Q.** How long was the period of on the job training
16 before you were able to take on investigations
17 on your own?

18 **A.** I think I got my first lead -- well, you never
19 really took them on on your own, you always had
20 somebody as a second officer, which nearly
21 always was Steve Bradshaw but my first case as
22 a Lead Investigator, I think, was in late 2011.

23 **Q.** At paragraph 29 of your statement, you refer to
24 the fact that, even after you started
25 undertaking your own investigations, that Steve

120

1 Bradshaw attended interviews as your Second
2 Officer?

3 **A.** Yes.

4 **Q.** For how long was that period of time where he
5 would attend interviews with you?

6 **A.** Probably until we really stopped doing full
7 investigations. We were very small team, so
8 myself and Steve Bradshaw lived relatively
9 close, so it was easier to always be -- work
10 together.

11 **Q.** Was that in 2013?

12 **A.** Yes.

13 **Q.** Then at paragraph 48 of your statement you say
14 that Cartwright King Solicitors started to
15 deliver training in 2013. Do you know why they
16 started running the training at that point?

17 **A.** I don't know the reason behind it, no. They did
18 run number of courses, usually once a year, for
19 a few years.

20 **Q.** Can we please have POL00129310 on screen,
21 please. So this is an email from Dave Posnett
22 to you and a number of others, dated 22 March
23 2013, and the subject is "Cartwright King
24 Training Day". So if we scroll down just
25 a little bit, please. There's a list of

121

1 that list on screen, please. It's page 10 of
2 your witness statement, which is WITN08950100.

3 If we can just go down to the end of that
4 list, please. In your statement you say that
5 you don't recognise the first 21 documents we
6 provided you with. So is it correct, then, that
7 you do recognise the final four in that list?

8 **A.** Yeah, I've probably seen them, yes, at some
9 point.

10 **Q.** Thank you. That can come down.

11 Could we then, please, have POL00122557 on
12 screen, please. At the bottom of page 1 we can
13 see this is an email from Rob King and you're
14 cc'd in and it was sent on 21 July 2013. He is
15 sending through the draft case review policy and
16 key points document.

17 If we go then to the top of that page. So
18 we can see this is an email from you to another
19 address which appears to be in your name. Is
20 that your personal email address?

21 **A.** It was at the time, yes.

22 **Q.** I think you explain in your statement that you
23 sent policies to your personal email to enable
24 you to print and review them when you were
25 working away from the office; is that correct?

123

1 proposed topics, which includes: awkward
2 interviewees; significant statements; points to
3 prove; interviewing techniques; defence
4 solicitor role; pre-interviewing/caution; and
5 borrow v dishonesty.

6 Do you remember attended that training?

7 **A.** Yes.

8 **Q.** What was your view of the training delivered by
9 Cartwright King?

10 **A.** Obviously, as a relatively new Security Manager,
11 any kind of training was useful. So, yeah,
12 I found it useful.

13 **Q.** Thank you. That document can come down. Do you
14 remember receiving any other refresher training
15 during your time as Security Manager?

16 **A.** We did sessions when we had team meetings on
17 various aspects of the role but I can't remember
18 anything specific, other than the Cartwright
19 King days.

20 **Q.** Moving on, then, to the guidance which was
21 available to you, relating to the conduct of
22 criminal investigations. The Inquiry provided
23 you with a number of policy and guidance
24 documents, which you list in your statement at
25 paragraph 19. Could we have just the end of

122

1 **A.** Yes.

2 **Q.** So do we take from that that you couldn't access
3 those documents from your work devices when you
4 were away from the office?

5 **A.** We could access them but couldn't print them
6 when you're away from the office, you can
7 only -- because it wouldn't connect to
8 a personal printer. At that time, we weren't
9 allocated work printers at home, so the only way
10 to print something off at home would be to send
11 it to my own email address so I could print it
12 at home, so I could be able to read it.

13 **Q.** So you could access them remotely from your work
14 device?

15 **A.** Yes.

16 **Q.** You just couldn't print; is that correct?

17 **A.** Just couldn't print.

18 **Q.** Thank you, that can come down.

19 Where do you remember policy and guidance
20 documents being stored?

21 **A.** I would imagine they'd have been on a database
22 that we had access to.

23 **Q.** If I could turn, then, please, to casework
24 compliance. The Inquiry has provided you with
25 a number of emails from 2011 from David Posnett

124

1 relating to casework compliance. Is it right
 2 that compliance checks were introduced shortly
 3 after you joined the Security Team?
 4 **A.** Yes, they were.
 5 **Q.** What was your understanding of the reason those
 6 checks were introduced?
 7 **A.** I think they just wanted uniformity in the way
 8 case files were put together, so that everybody
 9 was doing everything in a standard fashion.
 10 **Q.** Did you understand that there'd been a problem
 11 with that before?
 12 **A.** No, it was mentioned that it had been something
 13 that had been done in the past with previous
 14 Investigation Managers, so they thought, because
 15 we had so many new people, it would be
 16 worthwhile running again.
 17 **Q.** So one of the documents which Mr Posnett asked
 18 recipients of his email to familiarise
 19 themselves with was the Identification Codes
 20 document, and this is a document which you
 21 comment on at paragraph 58 of your statement and
 22 you refer to as a "disgrace". The Inquiry is
 23 familiar with this document and I don't intend
 24 to display it on screen but do you know the
 25 document I'm referring to?

125

1 identification codes you're referring to?
 2 **A.** That's the form we used, yes.
 3 **Q.** Can you remember using any other identification
 4 codes?
 5 **A.** With physical security, sometimes we'd get
 6 police reports that would have them on, so, if
 7 I didn't know one, I would use Google to find
 8 the latest ID codes. That's how I would refer
 9 to it.
 10 **Q.** Rather than using the Post Office documents?
 11 **A.** Yeah.
 12 **Q.** So if there were only those Identification Codes
 13 documents being used by the Post Office, can you
 14 think of any reason why Mr Posnett would have
 15 circulated a separate Identification Codes
 16 document?
 17 **A.** I don't know.
 18 **Q.** I'd like to ask you some questions about the
 19 involvement of Post Office Investigators
 20 following the identification of an apparent
 21 shortfall at audit.
 22 Who made the decision to commence a criminal
 23 investigation?
 24 **A.** As far as I recall, the cases were raised by
 25 Team Leaders. Later on it may have been the

127

1 **A.** I do, yes.
 2 **Q.** Does it remain your position that you don't
 3 recall ever having seen this document before?
 4 **A.** No, I don't.
 5 **Q.** Can you think of any reason why you wouldn't
 6 have seen it, given Mr Posnett asked you to
 7 familiarise yourself with the documents attached
 8 and you were fairly new to the team?
 9 **A.** I'd never really used identity codes, so it's
 10 not something that I was familiar with anyway.
 11 I mean, I may have opened the document but
 12 I wouldn't have read it in depth but I can't
 13 recall whether I did or not.
 14 **Q.** So you go on to explain in your statement that
 15 Security Managers used identification codes for
 16 reporting offences following prosecution, and
 17 these were recorded using the NPA01 form at
 18 interview and NPA02 form at conviction; is that
 19 correct?
 20 **A.** Yes.
 21 **Q.** Could we have a document reference POL00118374
 22 on screen, please. This is a blank NPA01 form,
 23 if we could go to the top of page 2, please. So
 24 we can see there's number of options for
 25 recording ethnic appearance. Are those the

126

1 Casework Team but, so far as I remember, it was
 2 Team Leaders who'd make the decision to commence
 3 an investigation.
 4 **Q.** When you were a Team Leader in 2013, do you
 5 remember what factors you would have considered
 6 in raising a case?
 7 **A.** No, because, again, I didn't really raise --
 8 that I can remember, I didn't raise any cases.
 9 It was done centrally at that point. But,
 10 again, possibly by another team leader.
 11 **Q.** So it wasn't your responsibility to raise a case
 12 whenever you became --
 13 **A.** Due to experience, no.
 14 **Q.** At paragraph 36 of your statement, you explain
 15 that you believe the level of loss required
 16 changed over time. Can you explain what you
 17 mean by that?
 18 **A.** I think once everything started to reduce with
 19 regards to investigations, the team got smaller,
 20 I think they didn't start looking at criminal
 21 investigations until the value -- it started to
 22 increase before they'd start looking at it.
 23 I can't remember any exact details but I did
 24 hear that they were looking at different figures
 25 at different times.

128

1 Q. When you refer to value, do you mean the --
 2 A. Cash.
 3 Q. -- the size of the loss?
 4 A. Yes.
 5 Q. At paragraph 31 of your statement, you explain
 6 that if a significant shortage was reported
 7 during a routine audit, your Team Leader may ask
 8 you to attend to begin investigating the issue
 9 as an open inquiry. Can you please explain what
 10 an open inquiry is?
 11 A. That's just an initial inquiry to find out the
 12 facts of what's happened before any decision is
 13 made on whether it would go to a full
 14 investigation.
 15 Q. So that was a step before --
 16 A. Yeah.
 17 Q. -- criminal investigation being commenced?
 18 A. Yes.
 19 Q. At paragraph 32, you explain that you might also
 20 be asked to attend an audit which was going to
 21 be raised due to a suspicious activity?
 22 A. Yes.
 23 Q. Can you help us with what you mean by
 24 "suspicious activity"?
 25 A. Chesterfield -- the admin centre in

129

1 obtained. What would that include at that
 2 point?
 3 A. Well, obviously, the auditors would run off
 4 Horizon logs, cash declarations, et cetera, and
 5 eventually they would produce an audit report,
 6 so all those documents would be passed to the
 7 Lead Investigator.
 8 Q. What tools were available to you as
 9 an Investigator to investigate that information
 10 you'd been provided with?
 11 A. Tools, as in?
 12 Q. Transaction data or any requests that you could
 13 make for further evidence?
 14 A. Right, yeah. Obviously, we had access to
 15 different types of data, such as Credence,
 16 HORice, ARQ data, as well.
 17 Q. How did you decide which type of transaction
 18 data you would request in a certain case?
 19 A. It varied from, in different circumstances --
 20 depends on the circumstances, whether you
 21 would -- I mean, Credence was virtually
 22 downloaded on every occasion. ARQ data
 23 occasionally, sometimes. It just depended on
 24 the facts of the case.
 25 Q. With regard, then, specifically to ARQ data,

131

1 Chesterfield, they may have noticed some
 2 suspicious transactions going through, or Cash
 3 Management might have raised an issue with cash
 4 not being sent back when the branch is holding
 5 an excessive amount of cash. So, under those
 6 circumstances, we may have been aware of
 7 an audit taking place that may result in
 8 a shortage, so we may be asked to attend on the
 9 day.
 10 Q. You explain in your statement at paragraph 37
 11 that, where there was prior notice of
 12 a potential shortage which resulted in an audit,
 13 the Security Manager would speak to the
 14 necessary individuals in the Post Office at the
 15 outset.
 16 A. Yeah.
 17 Q. So who would that include?
 18 A. The auditors, usually, and the postmaster or the
 19 staff member who was on site at the time.
 20 Q. Would those individuals be contacted in every
 21 case?
 22 A. If -- yeah, I would -- yes, eventually, yes.
 23 Sometimes a postmaster might not be on site, so
 24 you'd have to contact them by phone.
 25 Q. You go on to say that all relevant data would be

130

1 what circumstances would you request ARQ data?
 2 A. I think I only ever requested it on one or two
 3 occasions. Certainly high-value losses, later
 4 on, as -- obviously as Horizon Issues became
 5 more prevalent, then under those circumstances,
 6 as well.
 7 Q. You explain in your statement that you vaguely
 8 remember a case you worked on in Newcastle --
 9 A. Yeah.
 10 Q. -- where a subpostmaster had attributed
 11 a shortfall to Horizon and you requested two
 12 months' worth of ARQ data?
 13 A. Yes.
 14 Q. Did you request the ARQ data because they'd
 15 attributed the shortfall to Horizon in that
 16 case?
 17 A. It was requested because my line manager at the
 18 time asked me to get the data to basically
 19 rebuild the account over two months, to see if
 20 I could find any evidence of transactions that
 21 were out of sorts, out of place.
 22 Q. Is it correct that you remember going through
 23 the data yourself to rebuild the accounts?
 24 A. Yes.
 25 Q. Do you believe you had the necessary expertise

132

1 to interpret the ARQ data?
 2 **A.** Probably not, if I'm being honest. I did manage
 3 to rebuild the accounts, everything seemed to
 4 balance on that occasion but I'd never had any
 5 training in going through ARQ data at all.
 6 **Q.** Would you personally be able to recognise the
 7 bug or an error with Horizon from looking at the
 8 ARQ data?
 9 **A.** No.
 10 **Q.** You say that, as far as you recall, Fujitsu
 11 would not have gone through the data in this
 12 case?
 13 **A.** Not that I am aware of, no. They would just
 14 provide the data.
 15 **Q.** Was there a reason why they wouldn't have gone
 16 through it?
 17 **A.** I'm not aware of.
 18 **Q.** You go on to say, then, you're unsure if Fujitsu
 19 went through the data in any other case; is that
 20 correct?
 21 **A.** Yeah, I wouldn't be aware of that.
 22 **Q.** Would you not have expected Fujitsu to be asked
 23 to go through the data, given it was their data
 24 that they were providing?
 25 **A.** Looking back probably, yes.

133

1 **A.** No. I mean, I'd only been in the role for two
 2 months, so I wasn't really aware of any issues.
 3 **Q.** Do you remember any further discussion about
 4 that issue at the time?
 5 **A.** No.
 6 **Q.** Thank you. That can come down.
 7 So you also explain in your statement that,
 8 as part of the investigation, any activity would
 9 be recorded on an event log. Again, is that by
 10 the Security Manager?
 11 **A.** Yes, the person who was running the case as part
 12 of the case file. There was an event log that
 13 every action you took, you would list.
 14 **Q.** Were entries made throughout the investigation
 15 or just at a specific part?
 16 **A.** Throughout that, that I recall.
 17 **Q.** Was that from 2011 when you joined the Security
 18 Team?
 19 **A.** It may have started a little bit after that.
 20 But I certainly did use event logs a lot.
 21 **Q.** Is it correct that you were also involved in
 22 conducting interviews as a Security Manager?
 23 **A.** Yes.
 24 **Q.** So at paragraph 59 of your statement, you
 25 explain you recall a new set of interview

135

1 **Q.** Do you remember there being a limit on the
 2 number of ARQ requests, which could be provided
 3 by Fujitsu?
 4 **A.** There was a limit on the number of free ones,
 5 yes.
 6 **Q.** Do you ever recall being told you could not have
 7 ARQ data because of those limits?
 8 **A.** No.
 9 **Q.** Could we please have POL00167369 on screen,
 10 please. This is an email from Graham Ward to
 11 you and number of others and it's dated 14 April
 12 2011. The subject is "Credence v Fujitsu" and
 13 the body of the email says:
 14 "All
 15 "If anyone has any evidence of disparities
 16 between Fujitsu and Credence transaction data,
 17 please get in touch ([for example] timing issues
 18 ... session numbers not matching for postage
 19 label transactions etc)."
 20 Do you remember there being disparities
 21 between the Fujitsu and the Credence transaction
 22 data?
 23 **A.** I've never had an example of that, no.
 24 **Q.** Did this email cause you concern when you
 25 received it?

134

1 questions were provided to Security Managers in
 2 2013?
 3 **A.** Yes.
 4 **Q.** Can we please have POL00031005 on screen,
 5 please. This is the "Conduct of Criminal
 6 Investigations Policy", which is one of the
 7 documents you were provided with, and if we just
 8 go to the bottom of the page, please. We can
 9 see just at the very top right it's effective
 10 from 29 August 2013.
 11 **A.** Yeah.
 12 **Q.** If we can go to the bottom of page 16, please,
 13 just starting at paragraph 5.11.6, it says:
 14 "Should the recent Second Sight review be
 15 brought up by a suspect or his representative
 16 during a PACE interview the Security Manager
 17 should state: 'I will listen to any personal
 18 concerns or issues that you may have had with
 19 the Horizon system during the course of this
 20 interview.'"
 21 It goes on in the next paragraph to say:
 22 "The following three areas need to be
 23 covered in as much detail as possible at
 24 an appropriate point during all PACE interviews,
 25 regardless of whether Horizon is mentioned or

136

1 not. Where the case clearly has no link with
2 Horizon ([for example] theft of mail) then you
3 must gain authorisation from your line manager
4 to proceed outside of this process."

5 So if we could scroll down just a bit
6 further, we can see there's three topics:
7 training, support and Horizon. Are those the
8 new questions you're referring to?

9 **A.** Yeah, we were sent those on an email and,
10 obviously, they've been incorporated into that.

11 **Q.** Thank you. Can we please have POL00166044,
12 please. So this is a document we will come back
13 to again later, but it's a record of a case file
14 governance meeting, which took place on
15 31 July 2013. We can see that you were present.

16 **A.** Yeah.

17 **Q.** If we look at the fourth point in that document,
18 please. It says:

19 "Produce Template to assist Security
20 Managers for investigation interviews (questions
21 to include 'subpostmaster training, induction,
22 support')." "

23 We see your initials as one of the leads
24 beside that point. Are those the new interview
25 questions?

137

1 **A.** I think they just wanted to cover the bases with
2 regard to questions about it, to make sure that
3 they've asked about the training, the support
4 that the branches have been given, et cetera.

5 **Q.** Was it because you understood there had been
6 a problem with that previously?

7 **A.** With?

8 **Q.** With covering the bases, in terms of training
9 and Horizon issues in interviews?

10 **A.** I don't think so, no.

11 **Q.** You explain at paragraph 59 of your witness
12 statement that, when the new interview questions
13 were introduced, if a subpostmaster raised
14 issues with Horizon, Investigators would have to
15 report this in the case file?

16 **A.** That's the way I understood it, yes.

17 **Q.** And that an Investigator also had to request ARQ
18 data for the relevant period?

19 **A.** Yes, as far as I remember.

20 **Q.** Do we understand from that that these weren't
21 explicit requirements before 2013?

22 **A.** I don't remember being told explicitly to do
23 that in the past, no.

24 **Q.** Could we have your witness statement on screen,
25 please, at the bottom of page 43. It's page 43

139

1 **A.** Yes. The initials are the people that the
2 action was given to. However, that was not
3 drawn up by myself. It was drawn up by a lady
4 called Sharron Logan, because the email that
5 I've got with that on, has come from Sharron.

6 **Q.** Were you involved in drafting, then, the new
7 questions --

8 **A.** No.

9 **Q.** -- in the policy documents?

10 **A.** No, not at all.

11 **Q.** So what questions are those referring to that --

12 **A.** They are those questions but it's just that that
13 action was actually transferred to somebody
14 else.

15 **Q.** Okay, so even though it says you're one of the
16 leads, that's incorrect?

17 **A.** It's incorrect, yes.

18 **Q.** Thank you. That document can come down.

19 Do you remember the reason why those new
20 questions were introduced?

21 **A.** I think it came after the Second Sight report.
22 That's when it was drafted for us to use at
23 interview.

24 **Q.** Why did you understand Second Sight prompting
25 new --

138

1 and paragraph 97. You say:

2 "Following the introduction of further
3 questions to be asked to [subpostmasters] in
4 an interview relating to the Horizon system,
5 I believe that I would have considered
6 a challenge to the integrity of Horizon in one
7 case to be relevant to others. We had to ask
8 them in all new cases going forwards. I cannot
9 recall if I would have thought the same from
10 when I started in 2011 ..."

11 So is it your position that, before 2011,
12 you don't know whether you would have thought
13 that one Horizon case might be relevant to
14 another?

15 **A.** No, I don't think that's particularly clear. If
16 there were issues with Horizon, then, yes, it
17 would always have been relevant to other cases.

18 **Q.** Is that your position even before 2013?

19 **A.** Yes, yeah.

20 **Q.** So at all points when you were a Security
21 Manager, you would have thought a challenge
22 would have been relevant to another case?

23 **A.** If we'd been aware of anything, then, yes, it
24 would be relevant. Of course it would.

25 **Q.** When you say "aware of anything", do you mean

140

1 aware of a bug or aware of an allegation? What
 2 do you mean by that?
 3 **A.** Yeah, aware of any bugs in the system that would
 4 affect balancing.
 5 **Q.** What about if there was allegations that the
 6 Horizon system was at fault for a loss?
 7 **A.** Well, obviously that would need to be looked
 8 into.
 9 **Q.** Thank you. That can come down.
 10 Is it correct that following the interview,
 11 the Lead Investigator would complete a report
 12 which was reviewed by the Team Leader, before
 13 being passed to the Legal Team?
 14 **A.** Yes, unless he had any further investigation to
 15 do before he completed the case file. But
 16 eventually the case file would be passed to the
 17 Team Leader and then on to the Legal Team.
 18 **Q.** That case file would contain a report which is
 19 sometimes referred to as an offender report?
 20 **A.** Yes.
 21 **Q.** Who then made the decision to proceed to
 22 prosecute someone?
 23 **A.** That would be the Legal Team.
 24 **Q.** So you say in your statement that, at the end of
 25 the offender report, there was a conclusion
 141

1 to."
 2 **A.** Yes.
 3 **Q.** My question was: is that another way of saying
 4 that we recommended charges which were
 5 appropriate?
 6 **A.** Wouldn't be recommended, it would be what it
 7 showed, what the Investigator's opinion would
 8 be. But it wouldn't recommend charges.
 9 **Q.** So would it be "It's my opinion that the
 10 evidence shows that there is theft in this
 11 case"?
 12 **A.** I can't recall, to be honest.
 13 **Q.** Do you think that Investigators were qualified
 14 to provide a summary of what the facts pointed
 15 to in terms of criminal offences?
 16 **A.** Possibly Senior Investigators, maybe, yes.
 17 Obviously, it took time to learn those skills.
 18 **Q.** By a Senior Investigator, do you mean Security
 19 Managers that have been in the post for a long
 20 time or team leaders and above?
 21 **A.** Probably both.
 22 **Q.** Who made the decision, then, to recover a loss
 23 from a subpostmaster who was being prosecuted?
 24 **A.** That would be the Financial Investigators.
 25 **Q.** Did you have any involvement in relation to that
 143

1 section --
 2 **A.** Mm-hm.
 3 **Q.** -- where a summary could be provided of which
 4 offence the facts pointed to; is that correct?
 5 **A.** Yes.
 6 **Q.** So is that another way of saying that
 7 the Investigator would recommend which charges
 8 they considered to be appropriate?
 9 **A.** No, just what the evidence showed.
 10 **Q.** But would they say "The evidence shows that this
 11 is false accounting", "The evidence shows this
 12 is theft"?
 13 **A.** Can you just show me the phrase at the end of
 14 the report? I just can't remember it. Just
 15 repeat that question again?
 16 **Q.** Of course, no problem. So in your statement at
 17 paragraph 39, you say that, at the end of the
 18 report which went to the Legal Team -- I can get
 19 that up for you. It's page 18 of your
 20 statement.
 21 **A.** Ah right, yeah.
 22 **Q.** You say at the end of that paragraph 39:
 23 "At the end of the report there was
 24 a conclusion section where a summary could be
 25 provided in relation to what the facts pointed
 142

1 decision to recover losses?
 2 **A.** Not that I recall, no.
 3 **Q.** Could we please have POL00105025 on screen,
 4 please. This sets out the Security Team
 5 objectives from April 2013 to March 2014. If we
 6 could go to page 117 of that document, please.
 7 Thank you. Are those your objectives for
 8 that year?
 9 **A.** They are, yes.
 10 **Q.** Go to the bottom of that document, section 3.
 11 So we see the objective is:
 12 "To ensure a robust approach to fraud loss
 13 recovery with a return rate of 65%."
 14 Do you remember that being a personal
 15 objective or a team objective?
 16 **A.** It was a team objective.
 17 **Q.** Did you personally receive any benefit if that
 18 objective was met?
 19 **A.** Not that I recall, no.
 20 **Q.** Thank you very much, that document can come
 21 down.
 22 In the two cases that we will go on to touch
 23 on in a moment, you explain that you were the
 24 Second Officer in both cases; is that correct?
 25 **A.** Yes.
 144

- 1 **Q.** Can you just briefly explain the difference
2 between the Second Officer and the First or Lead
3 Investigator in a case?
- 4 **A.** The Second Officer is usually just in attendance
5 at an interview, sometimes at an audit shortage,
6 as well. At the interview, it would be around
7 meeting the interviewee, setting up the room,
8 making sure everything was set up for the
9 interview. You could interject with questions
10 if you felt there was a relevant one but most of
11 the questions would normally be done by the Lead
12 Investigator.
- 13 **Q.** Would the First and Second Officer typically
14 discuss a case before an interview?
- 15 **A.** Potentially, yes.
- 16 **Q.** Would there be any discussion afterwards about
17 further enquiries which might be necessary?
- 18 **A.** Not that I recall no. Usually once the
19 interview was done, the Second Officer would
20 step away.
- 21 **Q.** If you had a concern in respect of issues raised
22 during an interview or any other aspect of
23 a case, would you raise it with the First
24 Officer?
- 25 **A.** Yes.

145

- 1 **Q.** Is it also correct that you attended one of the
2 court hearings in his case?
- 3 **A.** Yes, I did attend. It was more of a learning
4 experience because I'd never actually been to
5 a live courtroom.
- 6 **Q.** Was it for your own experience rather than you
7 were there to provide any assistance?
- 8 **A.** Yes, it was just for my own experience.
- 9 **Q.** Did you have any further involvement in this
10 case?
- 11 **A.** Nothing at all. No.
- 12 **Q.** Moving on, then, to the case of Angela Sefton
13 and Anne Nield, who were employed at Fazakerley
14 Post Office.
- 15 **A.** Yeah.
- 16 **Q.** Could we please have POL00113343 on screen,
17 please, at page 6. This is a judgment of the
18 Court of Appeal in which the court quashed
19 Ms Sefton and Ms Nield's convictions, along with
20 others. If we could go to page 6, please,
21 starting at paragraph 23, I won't read the full
22 extract but I just wanted to highlight the
23 following paragraphs.
- 24 So at paragraph 23, then:
25 "On 11 April 2013, in the Crown Court at

147

- 1 **Q.** Turning first, please, to the case of Khayyam
2 Ishaq, who was the subpostmaster at Birkenshaw
3 Post Office, is it correct that you attended
4 Mr Ishaq's follow-up interview with Steve
5 Bradshaw --
- 6 **A.** Yes.
- 7 **Q.** -- which took place on 27 September 2011?
- 8 **A.** Yes.
- 9 **Q.** Were you aware at that time that Mr Ishaq had
10 previously been interviewed earlier that year?
- 11 **A.** Yes.
- 12 **Q.** Prior to attending the interview, did you
13 discuss the case with Mr Bradshaw?
- 14 **A.** Vaguely. I can vaguely remember discussions on
15 the basics on the case, yeah.
- 16 **Q.** What did you understand about the case before
17 you attended the interview?
- 18 **A.** Not a great deal, to be honest. As I say, the
19 case had already been running for a while.
20 I was just asked to come along for the second
21 interview, the follow-up interview.
- 22 **Q.** Is it right that you subsequently provided
23 a witness statement in the case exhibiting the
24 interview transcript?
- 25 **A.** Yes.

146

- 1 Liverpool before [His or Her Honour Judge]
2 Hatton, Angela Sefton and Anne Nield each
3 pleaded guilty to one count of false accounting
4 with which they were jointly charged. The
5 allegation against them was in short that
6 between 1 January 2006 and 6 January 2012 they
7 had falsified giro deposit entries on Horizon in
8 relation to the receipt of £34,115.50 in
9 donations made to the charity Animals In Need."
- 10 So paragraph 25 states:
11 "Ms Nield was employed as the branch manager
12 in the Fazakerley Post Office where Ms Sefton
13 was employed as a clerk. Their employer was the
14 [subpostmaster] but he was rarely at the branch
15 owing to illness. In 2006, the [subpostmaster]
16 identified an explained shortage of £4,000. He
17 paid half of the shortage and they paid the
18 other half. He told them that, from then on,
19 they would be responsible for all losses."
- 20 Paragraph 26:
21 "In December 2011, Santander bank contacted
22 [the Post Office] following a complaint to
23 Santander by Animals In Need that there was
24 a significant delay between money being
25 deposited in the Fazakerley Post Office and

148

1 payment into the charity's bank account. This
2 triggered an investigation."

3 Then paragraph 27:

4 "[The Post Office] audited the branch on
5 6 January 2012. During the audit, 40 giro
6 deposit slips and a number of cheque envelopes
7 were recovered from a cupboard which showed
8 suppressed deposits in the sum of £34,219.
9 Ms Sefton and Ms Nield handed the Auditor
10 a jointly signed letter in which they said
11 they'd tried to repay shortages by using their
12 own credit cards and their holiday money. They
13 had eventually run out of funds. As a result,
14 they began to covering up shortages by delaying
15 the processing of business deposits to Santander
16 and to one other bank. They could not explain
17 the shortages. They had reached 'breaking
18 point' in their lives and health had been deeply
19 affected."

20 Then paragraph 28:

21 "On 20 January 2012, Ms Sefton and Ms Nield
22 were each interviewed."

23 We'll come back to that interview. Over the
24 page at paragraph 33, then. The court's
25 conclusion was:

149

1 audit had already been arranged at the branch
2 for the next day; is that correct?

3 **A.** Yes, due to the complaint made by Santander.

4 **Q.** Do you understand it then to be a coincidence
5 the timing of her phoning Mr Bradshaw the day
6 before?

7 **A.** Yes, I don't think -- she wouldn't have been
8 aware that the Auditors were going.

9 **Q.** Is it correct, then, that you attended the audit
10 of the Fazakerley branch on 6 January 2012 with
11 Mr Bradshaw?

12 **A.** Yes, I accompanied Steve Bradshaw, yeah.

13 **Q.** When you arrived at the branch, the audit was
14 already under way; is that correct?

15 **A.** Yes.

16 **Q.** So what was your role during the audit?

17 **A.** I think Steve took me along just -- again, just
18 for experience and to have somebody with him in
19 case it moved on to searches, which it did. So
20 he obviously being local -- fairly local to
21 Steve, he asked me to come with him because it
22 was fairly short notice anyway.

23 **Q.** But your evidence is that you didn't actually
24 have any kind of active role during the audit?

25 **A.** No.

151

1 "In these circumstances, [the Post Office]

2 accepts that the prosecution of Ms Sefton and of
3 Ms Nield was unfair and an affront to justice."

4 That can come down.

5 So you explain at paragraph 76 of your
6 statement that the first thing you recall about
7 this case is Ms Nield phoning Steve Bradshaw on
8 the 5 January 2012; is that correct?

9 **A.** At the time, yes.

10 **Q.** Is it right that you understood she asked to
11 speak to him outside work about a matter?

12 **A.** Yes.

13 **Q.** What did you understand she wanted to speak to
14 him about?

15 **A.** I don't know until the day we went to the audit,
16 when Steve told me that they were having
17 balancing difficulties and they wanted to tell
18 somebody about it.

19 **Q.** Why was it Mr Bradshaw that she contacted in
20 those circumstances, do you know?

21 **A.** As Steve lives in Liverpool, so he's probably
22 aware of the office and the staff in the office,
23 so he's probably had previous dealings with
24 them.

25 **Q.** At the time that Ms Nield phoned Mr Bradshaw, an
150

1 **Q.** You explain in your statement that you witnessed
2 Ms Nield hand a letter to Mr Bradshaw; is that
3 correct?

4 **A.** Yes.

5 **Q.** Can you describe the circumstances in which the
6 letter was handed to Mr Bradshaw?

7 **A.** I can't recall, no.

8 **Q.** Do you remember if anything prompted the letter
9 being handed over, a question from Mr Bradshaw?

10 **A.** No, I don't think so.

11 **Q.** So you then explain that you were directed to
12 a number of Girobank deposit slips; is that
13 correct?

14 **A.** Yes.

15 **Q.** Who was that by?

16 **A.** I can't recall for certainty. I think it was
17 Ms Sefton but I'm not sure on that.

18 **Q.** So at this point, then, had the audit finished?

19 **A.** No, I think it was still ongoing.

20 **Q.** Was there a reason that you were then directed
21 to participate rather than the Auditors?

22 **A.** Just because the -- I think the ladies told
23 Steve where to find the documents.

24 **Q.** So there was a conversation with Mr Bradshaw
25 during the Audit?

152

1 A. Yes.

2 Q. Is it correct, then, that you subsequently
3 attended the searches of both Ms Sefton and
4 Ms Nield's homes later that day?

5 A. Yes.

6 Q. What was your role during those searches?

7 A. Just to assist Steve.

8 Q. You were also present during their interviews on
9 20 January 2012; is that correct?

10 A. Yes.

11 Q. If we could go, then, to the transcript of
12 Ms Sefton's interview, please, and the reference
13 is POL00044010. We can see that the date of the
14 interview is 20 January 2012 and you and
15 Mr Bradshaw attended along with Ms Sefton's
16 solicitor. If we go to page 2, please. So at
17 7 minutes and 53 seconds in, it says:
18 "SB read out the letter."
19 Do you understand that to be a reference to
20 the letter handed to Mr Bradshaw during the
21 audit?

22 A. Yes.

23 Q. The start of letter reads:
24 "In 2005 we had a change of computer systems
25 by the Post Office. It occurred that we had

153

1 with an upgrade of Horizon ..."

2 Just pausing there, who is the OIC in those
3 circumstances?

4 A. Officer in charge, so that would be -- I think
5 it was Anne Nield, I think. I think she was
6 the -- managing the office at the time.

7 Q. So in that context, then, the officer in charge
8 is the person at the branch --

9 A. Yes.

10 Q. -- rather than a criminal investigator?

11 A. No.

12 Q. "... and a problem with the declaration of the
13 cash. There is no errors so I am unable to put
14 in suspense. OIC is unable to make good as the
15 [postmaster] on holiday until 12/09/05.
16 "Please contact office and reply within
17 7 days."
18 Then the next paragraph, it says:
19 "I attended the office today to find that
20 the loss has now cleared for no apparent reason.
21 The office balanced £1,330 short last week but
22 this was due to a £1,250 entry with the ATM
23 meaning that this should straighten itself out
24 on balancing today. This will make a shortage
25 of £80 which the [subpostmaster] will make

155

1 a £4,000 shortage. The Post Office said they
2 would leave the shortage in abeyance for 6
3 months so that all work could be checked.
4 Nobody could find the shortage so the postmaster
5 was asked to pay it back in full."
6 So, stopping there, from the documents
7 provided to you by the Inquiry, do you know
8 whether the audit was the first time you
9 attended Fazakerley branch?

10 A. No, from the documents you provided, I didn't
11 remember them, but had done a couple of
12 intervention visits there back in, I think, it
13 was 2005.

14 Q. Thank you. That document can come down. If we
15 could have on the screen POL00044222. Thank
16 you. So we can see this is an "Area
17 Intervention Manager Visit Log". The date of
18 the visit is 14 September 2005, and the name of
19 the AIM -- is that Area Intervention Manager --

20 A. Yes.

21 Q. -- is yourself?

22 A. Yeah.

23 Q. So the details of visit read as follows:
24 "The above office has a loss from week 19 of
25 £592.21. OIC states this is something to do

154

1 good."

2 Do you remember this visit?

3 A. I don't.

4 Q. Do you accept, looking at that first
5 paragraph -- first of all, actually, did you
6 complete the "Details of visit"? Would that
7 have been your entry?

8 A. The top half is what would have been sent to me.
9 The bottom half is what I would have responded
10 with.

11 Q. So what we can see on screen at the minute --

12 A. Yeah --

13 Q. -- is that your entry or somebody else's?

14 A. Yeah, the above office bit, down to "Please
15 contact office", that would have been
16 pre-populated when it was sent out to me.

17 Q. Okay.

18 A. The bottom bit "I attended the office today",
19 that would have been the bit that I would have
20 filled in.

21 Q. So the top bit, would that have been
22 pre-populated by Ann Wilde? We can see that --

23 A. Yes.

24 Q. Do you know who that would have been?

25 A. I think she used to work in Chesterfield but I'm

156

1 not 100 per cent sure. But I used to get --
 2 some of these would come from Chesterfield.
 3 **Q.** So are the circumstances this: that a problem
 4 would be reported from a branch to Chesterfield?
 5 **A.** Yes.
 6 **Q.** Chesterfield would pre-populate part of the
 7 form --
 8 **A.** Yes.
 9 **Q.** -- send it to you to go to the branch?
 10 **A.** To arrange a visit, yes.
 11 **Q.** Then you would provide a response?
 12 **A.** A response, yeah.
 13 **Q.** If we could then just look at the first
 14 paragraph. Do you accept that, from looking at
 15 that, that there seems to be a problem, at least
 16 on the face of it, with the Horizon system?
 17 **A.** That seems to be what they've put it down to,
 18 yes.
 19 **Q.** When you attended the office, you found that the
 20 loss had cleared for no apparent reason?
 21 **A.** Yeah, it may well have been that they've
 22 accepted another transaction correction because,
 23 having read all the documents, they used to get
 24 quite a few transaction corrections.
 25 **Q.** But you can't tell that --

157

1 **Q.** Okay. So that would have been your entry but
 2 you can't help us with --
 3 **A.** I have no idea what a "DUPOF Visit" was because
 4 it's obviously come out to me with just "DUPOF",
 5 so at the time I assume I would have known what
 6 that was about, so I must have been getting
 7 a few of those at the time.
 8 **Q.** Then, finally on this topic, can we please have
 9 POL00044223 on the screen, please. This is the
 10 third log and the date of the visit is
 11 8 February 2006. In "Details of visit", we see
 12 there's a £3,959 shortage in week 41. Would
 13 that have been your entry?
 14 **A.** That would have been -- again, that would have
 15 been pre-populated and sent out to me with the
 16 details. I assume the branch must have settled
 17 that centrally, so it's gone to Chesterfield so
 18 they will have populated it to send somebody out
 19 to see if they could --
 20 **Q.** Sorry, can you just repeat your answer?
 21 **A.** Can you just scroll it back down again a second
 22 for me?
 23 **Q.** Can we just go to the top, thank you.
 24 **A.** Yeah, the top part of that would have been
 25 pre-populated. I would assume that the branch

159

1 **A.** No.
 2 **Q.** -- from looking at this --
 3 **A.** No.
 4 **Q.** -- and you have no independent recollection of
 5 it?
 6 **A.** I can't recall, no.
 7 **Q.** If we could go then to consider POL00068605,
 8 please. This is another log, again with your
 9 name on it, and the date of the visit is
 10 18 January 2006. The "Details of visit" say
 11 "DUPOF Visit".
 12 **A.** Yes.
 13 **Q.** What does this refer to?
 14 **A.** I saw this one, I think you sent me this one
 15 last week and I have no recollection of what
 16 "DUPOF" stands for. I can only assume there was
 17 some work going on at the branch. It could have
 18 been disability access, or other things it could
 19 have been involved with is security
 20 installation, cameras, et cetera. But
 21 I honestly cannot recall what that visit was
 22 about.
 23 **Q.** But would that -- would you have completed that
 24 "Details of visit" section?
 25 **A.** Yes.

158

1 has settled the shortage centrally, so it's gone
 2 to Chesterfield, and they would have
 3 pre-populated the form and sent it out as
 4 a request to go and assist.
 5 **Q.** Thank you. If we could go to the bottom of that
 6 page, then, please, we see another box which
 7 says, "Current issues" -- would that have been
 8 your entry, this box --
 9 **A.** Yes.
 10 **Q.** -- which says:
 11 "I attended the office as they had received
 12 a request for payment for the loss sustained in
 13 TP09. Chesterfield have now put a temporarily
 14 block on this awaiting a transaction correction.
 15 I have checked all the office documents,
 16 transaction logs and events logs for the week
 17 concerned and there is no sign of what has
 18 caused this loss. I have contacted Girobank,
 19 who are looking to see if there are any errors
 20 that have come to light. I have advised the
 21 manager that Chesterfield will only allow the
 22 block to stand for so long unless they can
 23 discover where the errors were made. If not,
 24 then the postmaster will have to make
 25 arrangements to settle with Chesterfield.

160

1 Girobank have stated that there is no
2 discrepancy showing."

3 Do you remember this visit?

4 **A.** I don't remember the visit, no.

5 **Q.** Do you, at any point, have a recollection of
6 speaking to either the subpostmaster or
7 Ms Sefton and Ms Nield?

8 **A.** I mean, obviously, I have visited the branch or
9 I must have spoken to them. I know the
10 postmaster wasn't in branch very often, he left
11 them to run the branch for them, so I would
12 assume I've spoken to one of the two ladies
13 there.

14 **Q.** Do you accept, then, that you've said that there
15 is no sign of what's caused this almost £4,000
16 loss?

17 **A.** Yeah, I mean, my role in the visit was to go
18 through all of the documents to see if I could
19 see anything. Obviously, I can only go through
20 what was on hand. So, obviously, I'm not
21 finding anything, I've contacted Girobank. In
22 those days, sometimes we could ring them to try
23 to speed up an error process, if there'd been
24 an error. And then I'd completed this to send
25 it back to where it came from so that they could

161

1 **Q.** Which you couldn't find an explanation for --

2 **A.** Yes.

3 **Q.** -- when you attended? Do you accept that this
4 sounds similar to the loss reported in the
5 letter handed to Mr Bradshaw, the £4,000 loss?

6 **A.** Yeah, it's similar. I'm not sure on the
7 timeline how far away it was from then.

8 **Q.** They say it was 2005, and the date of this visit
9 is 2006 --

10 **A.** Right.

11 **Q.** -- at the start of 2006.

12 **A.** Possibly. I don't know, honestly.

13 **Q.** Did you inform Mr Bradshaw that you'd attended
14 this branch previously when it was experiencing
15 shortages?

16 **A.** No, because I had no recollection of it at the
17 time.

18 **Q.** Did you ever check your records to see if you'd
19 previously visited a branch you were involved in
20 investigating?

21 **A.** Unfortunately, as I said to you earlier, that
22 I was -- I'd decided to take redundancy, so
23 I was going through that process, so one of the
24 parts of that process was to clear my laptop, so
25 I didn't have all those records any more.

163

1 make further checks. So I had no access to any
2 other data.

3 **Q.** So you would have completed that and sent it
4 back to Chesterfield --

5 **A.** Yes.

6 **Q.** -- is that your description?

7 So would it have been usual for you to have
8 received anything back from Chesterfield or
9 would it be usual for you to not hear anything
10 after that?

11 **A.** It would be -- usually, I would not hear
12 anything. I was just boots on the ground to go
13 and have a look to see if I could help and then
14 it goes back to Chesterfield.

15 **Q.** Would you have been concerned about that
16 situation, where you've got quite a large loss
17 and no sign of what's caused it?

18 **A.** In those days, the problem was a lot of errors
19 took a very long time to come back, hence the
20 shortcut by ringing Girobank to see if they
21 could identify anything because, historically,
22 Girobank were very, very slow on sending errors
23 back. But that wasn't -- I wouldn't say it was
24 common but it happened, where you'd have losses
25 like that.

162

1 **Q.** So even if you'd wanted to --

2 **A.** No.

3 **Q.** -- when you joined the Security Team you
4 couldn't have checked your records?

5 **A.** No.

6 **Q.** Did you ever ask whether those checks could be
7 made or think about making those checks?

8 **A.** Not that I recall, no.

9 **Q.** Can you see any potential problems with not
10 making those checks?

11 **A.** I mean, ordinarily when an investigation is
12 going on, they would be checking for losses
13 anyway on the branch.

14 **Q.** But, in this circumstance, where maybe
15 Mr Bradshaw might not have known, can you see
16 any problems with you not having independently
17 told him that you'd been at this branch before?

18 **A.** Yeah, obviously, if I'd recalled it, then
19 I would have told him but I didn't at the time.

20 **Q.** You subsequently provided a witness statement in
21 this case, dated 21 March 2012; is that right?

22 **A.** Yeah.

23 **Q.** That dealt with the audit, the searches --

24 **A.** Yes.

25 **Q.** -- and the interview. Did you have any further

164

1 involvement in this case?
 2 **A.** Nothing at all, no.
 3 **MS MILLAR:** Thank you, sir. I wonder if that would
 4 be a convenient moment. I don't have many more
 5 questions for Mr Ryan but if we could have
 6 a 15-minute break, please.
 7 **SIR WYN WILLIAMS:** Yes, certainly so what time shall
 8 we --
 9 **MS MILLAR:** 3.25?
 10 **SIR WYN WILLIAMS:** 3.25. All right, fine.
 11 **MS MILLAR:** Thank you very much.
 12 **(3.05 pm)**
 13 **(A short break)**
 14 **(3.25 pm)**
 15 **MS MILLAR:** Thank you, sir, can you see and hear us?
 16 **SIR WYN WILLIAMS:** Yes, thanks, yes.
 17 **MS MILLAR:** Thank you.
 18 Mr Ryan, earlier on I'd taken you to one of
 19 the logs where it said "DUPOF".
 20 **A.** Yes.
 21 **Q.** You couldn't remember what that was. Does
 22 "Deprived Urban Post Office Fund" sound correct?
 23 **A.** Yes, yes, it does. It was basically a fund for
 24 helping postmasters do branches up so that that
 25 equates to the work that was done in the branch.

165

1 always came from the top. I don't know where it
 2 came from beyond John Scott, but we were always
 3 told it was business as usual, "Carry on,
 4 Horizon is fine".
 5 **Q.** Were those oral assurances, written assurances?
 6 **A.** Mostly oral at team meetings on conference
 7 calls.
 8 **Q.** Who from Fujitsu assured you that Horizon was
 9 robust?
 10 **A.** I had no contact direct from Fujitsu.
 11 **Q.** So when you say in your statement "We were
 12 always assured by the Post Office and Fujitsu
 13 that the Horizon system was robust" --
 14 **A.** Yeah, the comments were -- from John Scott would
 15 be that Fujitsu had informed him, et cetera,
 16 et cetera, and he filtered that down to us, that
 17 Horizon is robust.
 18 **Q.** So it was something that he was passing on --
 19 **A.** Yes.
 20 **Q.** -- coming from Fujitsu?
 21 **A.** Yes.
 22 **Q.** Was your understanding?
 23 **A.** That's my understanding, yeah.
 24 **Q.** Could we please have POL00094108 on screen,
 25 please. We can see this is an internal memo to

167

1 So, obviously, the Post Office had paid or
 2 helped to pay for some renovations in some way.
 3 Thank you. That's just for completeness.
 4 Finally, I just want to turn to ask you some
 5 questions about your knowledge about problems
 6 with the Horizon system. At paragraph 53 of
 7 your witness statement, you say:
 8 "I do not recall ever having any issues or
 9 errors with the Horizon system being reported to
 10 me. We were always assured by the Post Office
 11 and Fujitsu that the Horizon system was robust."
 12 **A.** Yeah.
 13 **Q.** Does that remain your position?
 14 **A.** Yes.
 15 **Q.** You also say in your statement that you were
 16 regularly informed the same by the Post Office
 17 in your team meetings?
 18 **A.** That's correct.
 19 **Q.** Can you help us with the names of the
 20 individuals from the Post Office who assured you
 21 that Horizon was robust?
 22 **A.** It was a number of people from the top down, so
 23 I -- John Scott, Andy Hayward, and any of the
 24 team leaders that I had over that timescale. So
 25 Helen Dickinson, Keith Gilchrist. I think it

166

1 the Post Office Security Team from Helen
 2 Dickinson, and it's dated 9 September 2011.
 3 If we go down the page, then, please, we can
 4 see that it discusses a financial investigation
 5 which has now been concluded:
 6 "The subpostmaster ... was reinstated at the
 7 branch as there had been failings in the
 8 training given by Post Office Limited. He
 9 intimated to the Auditor that Horizon system had
 10 'lost' data. The Contracts Manager, Paul
 11 Williams, felt that due to these issues he would
 12 have to reinstate with conditions attached
 13 including a full repayment of the shortage."
 14 Next paragraph, it says:
 15 "Kevin Ryan, Security Manager discussed the
 16 case with Leslie Frankland and Dave Pardoe and
 17 it was decided that there was no point in
 18 continuing with the investigation."
 19 Do you have any recollection of that case?
 20 **A.** No, that would have been one of the very early
 21 cases that I would have been allocated in 2011.
 22 From reading that, I would say, the Contract
 23 Manager, probably following a discussion with
 24 him, he decided that there was enough to put the
 25 postmaster back in place. So I raised that with

168

1 my Team Leader, they decided that, under those
 2 circumstances, we wouldn't proceed with
 3 an investigation.
 4 **Q.** Do you accept that, on one reading, the reason
 5 for his reinstatement and the stopping of the
 6 investigation was because the Horizon system had
 7 lost data?
 8 **A.** Well, the postmaster has intimated that. I had
 9 no information on that at the time.
 10 **Q.** Can you recall what information you had or --
 11 **A.** I can't, no.
 12 **Q.** Thank you. If we --
 13 **SIR WYN WILLIAMS:** It wasn't just -- excuse me, it
 14 wasn't the postmaster saying it. I think
 15 Ms Millar's point is that, if you carry on
 16 reading, the Contracts Manager, Mr Williams,
 17 appears to have accepted it.
 18 **A.** Yes.
 19 **SIR WYN WILLIAMS:** Do you know why he accepted it.
 20 **A.** I can't recall why, no. He's obviously had his
 21 own discussion with the postmaster.
 22 **SIR WYN WILLIAMS:** But this is an example, is it
 23 not, of a complaint about Horizon apparently
 24 being accepted by the Post Office?
 25 **A.** Feasibly, yes.

169

1 together that listed the whole -- all the active
 2 cases, so that he could study every single case.
 3 **Q.** Did that just involve you providing him
 4 literally with the case files?
 5 **A.** With the information, yeah. No, with the
 6 information from the case files. It was just
 7 an Excel spreadsheet, effectively, that had all
 8 the active cases on.
 9 **Q.** Were you responsible, then, for populating that
 10 spreadsheet with information from the case
 11 files?
 12 **A.** I don't recall ever populating it, it was just
 13 putting the spreadsheet together. As I say,
 14 I was surprised to be in the role because it was
 15 quite early in my career. So I was just asked
 16 to put that together. That tended to be the
 17 kind of thing that they asked me to do.
 18 **Q.** You go on to say that you were tasked with
 19 putting together the spreadsheet and adjusting
 20 it, as and when requested by John Scott?
 21 **A.** Yes.
 22 **Q.** What does that mean: adjusting it as and when
 23 requested?
 24 **A.** One of the forms we saw earlier on mentioned
 25 about adding certain tabs and lines to add

171

1 **SIR WYN WILLIAMS:** Yes, okay thanks.
 2 **MS MILLAR:** Do you remember that when you stepped
 3 into the role of Team Leader that the Second
 4 Sight report was published around the same time?
 5 **A.** Yes.
 6 **Q.** What was your understanding at the time of the
 7 significance of that report for criminal
 8 investigations?
 9 **A.** Again, we were informed that we would carry on
 10 as normal, because they would defend Horizon.
 11 So that's what they were telling us, so that's
 12 what we were led to believe, so that's what we
 13 continued to do.
 14 **Q.** Could we, please, have POL00125273 on screen,
 15 please. This is a "Profile Form" and it's got
 16 your name on it. At the top of page 9 then,
 17 please, it explains some of the activities that
 18 you undertook as the Team Leader and mentions
 19 that it came at an exceptionally busy time when
 20 the Second Sight Report was published and this
 21 resulted in a lot of work being generated around
 22 case file governance.
 23 Can you help us with what that means?
 24 **A.** John Scott decided he wanted to see every case
 25 file. So I was asked to put a spreadsheet

170

1 further information to the spreadsheet.
 2 **Q.** This may be the document you're referring to but
 3 could we go back, then, to POL00166044. This is
 4 the record of the case file governance meeting
 5 that we looked at earlier, and we've looked at
 6 point 4 already. Could we look at point 7, just
 7 further down the page. It says:
 8 "Cascade to Security Managers: Requirement
 9 to censure emails, particularly with reference
 10 to Second Sight review/Horizon and any
 11 personal/opinionated comments that could become
 12 public/requested under the Freedom of
 13 Information Act."
 14 Similar to earlier, we see that your
 15 initials are beside the lead for that point.
 16 Can you help us with what that means?
 17 **A.** Basically, that was a message from John Scott
 18 and the other Senior Security Managers and that
 19 was to be passed on to the members of your team.
 20 **Q.** What was it that had to be passed on?
 21 **A.** Basically, the message that is within that
 22 information there.
 23 **Q.** When it says, "The requirement to censure
 24 emails", is that censor, remove information?
 25 **A.** No, just not to put any comments on around --

172

1 banter, that type of thing that you would get
 2 between Security Managers, like people do in
 3 a workplace. So just to be careful what you put
 4 in an email regarding Second Sight.
 5 **Q.** Can you tell help us with what kind of banter
 6 there was going around at the time that needed
 7 to be controlled?
 8 **A.** Yeah, just everyday stuff, you know, asking
 9 people what they were doing at the weekend and
 10 making jokes about it. Nothing to do with your
 11 case files, it was just everything else. On
 12 that particular point, he was asking us not to
 13 make too many references to Second Sight.
 14 **Q.** Why did you understand he was making that
 15 request --
 16 **A.** I don't know. I just followed what I was told
 17 to do.
 18 **Q.** Did you ever question what you were being told
 19 to do?
 20 **A.** No.
 21 **Q.** Point 8, then:
 22 "Liaison Cases: Ensure Security Managers
 23 have oversight and are aware of third party
 24 operations (Royal Mail/Police), that could
 25 impact on the Second Sight Review/Horizon
 173

1 was just to make them aware of it, is all I can
 2 recall.
 3 **Q.** Thank you. That document can come down.
 4 So having considered all of those documents
 5 and the other ones provided to you by the
 6 Inquiry, does it remain your position that you
 7 don't recall ever having any issues or errors
 8 with the Horizon system reported to you?
 9 **A.** Not that I can remember, no.
 10 **Q.** You explain in your statement at paragraph 14
 11 that the decision was made not to pursue any new
 12 prosecutions in 2013; is that correct?
 13 **A.** I think there may have been one or two after
 14 then but I certainly wasn't involved in any.
 15 **Q.** Were you told about the reasons for that
 16 decision at the time?
 17 **A.** They were looking for a new subject matter
 18 expert to defend Horizon.
 19 **Q.** Did you understand that there had been an expert
 20 previously that they were looking to replace?
 21 **A.** Yes.
 22 **Q.** Who was that, please?
 23 **A.** Gareth Jenkins.
 24 **Q.** Did you have any interaction with Mr Jenkins
 25 that you can remember?
 175

1 integrity."
 2 Again, we see your name beside the lead.
 3 **A.** Yeah.
 4 **Q.** Can you help us with what that is?
 5 **A.** Yeah, there were a lot of cases that were police
 6 liaison cases. So, as an example, if
 7 a postmaster reported one of his clerks for
 8 theft to the police, then we needed to notify
 9 the police regarding the information around
 10 Second Sight.
 11 **Q.** So that was to provide information about Second
 12 Sight --
 13 **A.** Yes.
 14 **Q.** -- to those people?
 15 **A.** Yeah, we were given a document that we would
 16 send in those cases, we'd send out to the
 17 police.
 18 **Q.** Do you remember what that document says?
 19 **A.** I don't but I'm pretty sure I've probably got it
 20 somewhere.
 21 **Q.** Was the message in the document that the Second
 22 Sight had taken place and was there any
 23 undertaking as to the integrity of Horizon in
 24 that --
 25 **A.** I can't remember exactly what was in it but it
 174

1 **A.** No.
 2 **Q.** Who told you that he was the subject matter
 3 expert?
 4 **A.** It would have, again, been relayed at a team
 5 meeting, he would have been mentioned. I know
 6 from the documents you've provided he was
 7 involved in the two cases that you raised
 8 earlier.
 9 **Q.** But at that point in both of those cases, you
 10 had no involvement; is that correct?
 11 **A.** No.
 12 **Q.** So when you say they were looking for a new
 13 expert, what did you understand that led them to
 14 seek a new subject matter expert?
 15 **A.** I don't know. All I know was there was a reason
 16 why Gareth Jenkins couldn't be used in the
 17 future. So they were -- we were told that, once
 18 they'd found a new subject matter expert, we
 19 would continue doing prosecutions.
 20 **Q.** Was that reason explained to you at the time?
 21 **A.** No.
 22 **Q.** Could we please have POL00124105 on screen,
 23 please, at page 3. This is an email from Mark
 24 Raymond to you and a number of others. Can you
 25 help us with who Mark Raymond is, please?
 176

1 **A.** He's the current Head of Security.
 2 **Q.** It's dated 20 December 2017. The first
 3 paragraph says:
 4 "I just wanted to give you a quick update
 5 from the prosecution's meeting ..."
 6 The second paragraph says:
 7 "A report has been produced externally
 8 examining the issues with regard to the Group
 9 Action litigation ..."
 10 Do you have any understanding of what that
 11 was at the time?
 12 **A.** No.
 13 **Q.** The last two sentences of that paragraph read:
 14 "The report has been considered by
 15 a specialist external lawyer."
 16 Can you help us with who that was?
 17 **A.** I have no idea at all, no.
 18 **Q.** "Certain findings have been referred back for
 19 clarity but overall there appear to be no major
 20 flaws."
 21 What did you understand that to be
 22 a reference to?
 23 **A.** I would imagine that's in relation to Horizon
 24 but I'm only assuming that. I don't know for
 25 certain.

177

1 **Q.** Thank you. That can come down.
 2 With the benefit of hindsight, then, do you
 3 have any reflections in respect of the way in
 4 which criminal investigations were conducted by
 5 the Post Office?
 6 **A.** Yeah, I wish we'd have been privy to all the
 7 facts because we certainly weren't.
 8 **MS MILLAR:** Thank you for your assistance, Mr Ryan.
 9 I don't have any further questions for you.
 10 Sir, do you have any questions before I turn
 11 to the representatives from the Core
 12 Participants?
 13 **SIR WYN WILLIAMS:** No, thank you, no.
 14 **MS MILLAR:** I think those are all of the questions
 15 for Mr Ryan. Thank you.
 16 **SIR WYN WILLIAMS:** All right.
 17 Well, thank you very much, Mr Ryan, for
 18 coming to give evidence to the Inquiry and
 19 providing your witness statement in advance.
 20 I'm obliged to you.
 21 **THE WITNESS:** Thank you.
 22 **MS MILLAR:** Thank you, sir.
 23 **SIR WYN WILLIAMS:** I think, Ms Millar, tomorrow is
 24 now a non-sitting day and we will resume on
 25 Friday, yes?

179

1 **Q.** Can you remember receiving this email?
 2 **A.** No.
 3 **Q.** If we go down, then, to the fourth paragraph, it
 4 says:
 5 "What has been highlighted is the risk of
 6 testing a case in the criminal court prior to
 7 the civil hearing, where the burden of proof has
 8 to be beyond all reasonable doubt, as opposed to
 9 the balance of probability in civil cases. The
 10 risk is that should a trial collapse or not
 11 guilty advert be reached, this could have
 12 a devastating impact on the civil cases ..."
 13 The next paragraph reads:
 14 "At this stage the risk appetite dictates
 15 that every case will be reviewed on its merits,
 16 weight of evidence and public interest as it is
 17 now, however we are unlikely to proceed to
 18 prosecute until post-civil action ..."
 19 Did you understand that to mean that there
 20 was going to be a pause on prosecutions because
 21 of the civil litigation?
 22 **A.** Yes, I would say so.
 23 **Q.** What was your view of the decision?
 24 **A.** At the time, I suppose they would know better
 25 than I would, so we just accepted that.

178

1 **MS MILLAR:** Correct, sir. Thank you.
 2 **SIR WYN WILLIAMS:** All right, 10.00 on Friday.
 3 **(3.41 pm)**
 4 **(The hearing adjourned until 10.00 am**
 5 **on Friday 15 December 2023)**
 6
 7
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

180

I N D E X

Announcement re Evidence of MARTIN SMITH	1
CHRISTOPHER GRANVILLE KNIGHT (sworn)	2
Questioned by MS PRICE	2
Questioned by MS PATRICK	86
Questioned by MR JACOBS	95
KEVIN JAMES RYAN (affirmed)	110
Questioned by MS MILLAR	110

<p>MR JACOBS: [2] 95/21 109/6</p> <p>MS MILLAR: [13] 110/1 110/4 110/7 165/3 165/9 165/11 165/15 165/17 170/2 179/8 179/14 179/22 180/1</p> <p>MS PATRICK: [1] 86/13</p> <p>MS PRICE: [17] 1/3 1/6 2/20 2/23 25/9 25/13 54/22 54/25 55/2 55/6 55/8 86/6 86/10 95/19 109/9 109/18 109/22</p> <p>SIR WYN WILLIAMS: [27] 1/5 1/8 25/6 25/11 54/10 54/15 54/21 54/24 55/1 55/7 86/9 86/11 109/8 109/11 109/21 110/3 165/7 165/10 165/16 169/13 169/19 169/22 170/1 179/13 179/16 179/23 180/2</p> <p>THE WITNESS: [1] 179/21</p> <hr/> <p>'11 [1] 25/8 '97 [1] 8/3 'branches [1] 89/7 'breaking [1] 149/17 'CASH' [1] 77/18 'cause [1] 94/3 'Do [1] 105/23 'error' [1] 77/21 'gaps' [1] 53/5 'glitch' [1] 43/20 'Good [1] 106/2 'I [2] 72/2 136/17 'I was [1] 72/2 'I will [1] 136/17 'Item [1] 75/12 'lost' [1] 168/10 'no [1] 60/23 'subpostmaster [1] 137/21 'would [1] 52/1</p> <hr/> <p>0</p> <p>00.07.37 [1] 91/4 006 [1] 11/19 01 [1] 106/16 05 [1] 155/15</p> <hr/> <p>1</p> <p>1 February 2009 [1] 41/19 1 February 2010 [1] 43/11</p>	<p>1 January [2] 80/16 81/22 1 January 2006 [1] 148/6 1 November [1] 24/20 1 November 2011 [1] 25/2 1,250 [1] 155/22 1,330 [1] 155/21 10 [4] 9/11 16/1 101/20 123/1 10 February [1] 81/3 10 February 2010 [3] 78/4 80/17 81/22 10 June 2013 [1] 87/16 10.00 [3] 1/2 180/2 180/4 100 [7] 47/13 48/20 48/24 51/2 64/11 116/22 157/1 100 per cent [2] 48/13 49/22 107 [1] 85/3 11 [4] 16/21 91/2 115/14 147/25 11 March 2010 [1] 73/25 11,900 [1] 76/4 11,970.69 [1] 79/24 11.23 [1] 55/3 11.40 [3] 55/1 55/2 55/5 116 [2] 65/20 65/21 117 [1] 144/6 12.13 am [1] 59/22 12.57 [1] 109/23 12/09/05 [1] 155/15 12K [2] 78/4 78/7 13 [1] 19/7 13 December 2023 [1] 1/1 14 [2] 29/24 175/10 14 April [2] 57/16 134/11 14 April 2010 [1] 28/15 14 September 2005 [1] 154/18 14,000 [2] 46/19 91/11 15 [3] 54/25 78/7 102/1 15 December [1] 180/5 16 [2] 37/1 136/12 16 November [1] 83/15 16 November 2023 [1] 110/11 17 November [1] 51/12 17 November 2010 [1] 83/3</p>	<p>18 [3] 10/21 114/8 142/19 18 April [1] 59/14 18 January [2] 52/20 158/10 18 October [1] 49/9 18,000 [1] 51/22 19 [3] 80/11 122/25 154/24 19 September [1] 38/11 1983 [1] 3/23 1985 [1] 111/5 1996 [3] 12/12 13/3 13/23 1997 [5] 4/8 7/12 80/16 81/22 111/16 1998 [1] 13/24 1999 [1] 8/11 1st [1] 75/5</p> <hr/> <p>2</p> <p>2 July 2010 [1] 68/24 2 March [1] 43/6 2.00 [2] 109/18 109/25 20 [5] 54/1 54/5 54/17 77/22 114/9 20 April 2010 [1] 77/7 20 December 2017 [1] 177/2 20 January [1] 153/9 20 January 2012 [2] 149/21 153/14 2000 [4] 4/14 5/12 8/11 8/25 2000s [1] 19/8 2001 [1] 12/9 2002 [1] 102/20 2003 [1] 6/9 2003/2004 [1] 6/10 2004 [3] 6/10 9/6 16/25 2005 [5] 112/3 153/24 154/13 154/18 163/8 2006 [8] 10/3 112/3 148/6 148/15 158/10 159/11 163/9 163/11 2007 [1] 16/25 2008 [2] 10/3 38/12 2009 [1] 41/19 2010 [31] 25/7 25/14 25/21 28/15 43/6 43/11 46/5 49/9 51/12 55/13 68/22 68/24 73/25 75/24 76/10 77/7 77/11 78/3 78/4 78/24 80/11 80/17 81/18 81/22 83/3 88/6 89/16 90/10 112/16 112/18 112/20 2010-ish [1] 36/20</p>	<p>2011 [21] 24/20 25/2 52/20 54/3 57/16 59/14 61/23 84/19 101/20 113/10 113/25 120/22 124/25 134/12 135/17 140/10 140/11 146/7 148/21 168/2 168/21 2012 [9] 25/20 148/6 149/5 149/21 150/8 151/10 153/9 153/14 164/21 2013 [18] 10/13 87/7 87/16 113/12 115/2 121/11 121/15 121/23 123/14 128/4 136/2 136/10 137/15 139/21 140/18 144/5 147/25 175/12 2014 [1] 144/5 2015 [1] 97/9 2016 [1] 7/4 2017 [1] 177/2 2021 [1] 97/8 2023 [4] 1/1 3/7 110/11 180/5 21 [1] 123/5 21 July 2013 [1] 123/14 21 March 2012 [1] 164/21 21 May [1] 80/25 21 May 2010 [1] 78/24 22 [2] 33/11 38/4 22 March [1] 121/22 23 [3] 17/24 147/21 147/24 23 February [1] 43/13 23 February 2002 [1] 102/20 23 October [1] 3/7 24 [1] 16/20 24 May 2011 [1] 61/23 25 [1] 148/10 25 March 2010 [1] 75/24 26 [1] 148/20 26 years [1] 117/23 27 [4] 40/11 79/22 96/12 149/3 27 September 2011 [1] 146/7 28 [4] 75/2 97/20 116/5 149/20 28 September [1] 46/5 29 [3] 19/6 71/18 120/23 29 August 2013 [1] 136/10 29 September 2010 [1] 81/18</p>	<p>3</p> <p>3,959 [1] 159/12 3-month [1] 75/10 3.05 [1] 165/12 3.1 [1] 27/7 3.25 [3] 165/9 165/10 165/14 3.41 [1] 180/3 30 [1] 20/23 30 June 2011 [1] 84/19 31 [1] 129/5 31 July 2013 [1] 137/15 32 [3] 22/1 22/3 129/19 33 [3] 29/22 29/24 149/24 34,115.50 [1] 148/8 34,219 [1] 149/8 36 [1] 128/14 37 [3] 85/4 91/4 130/10 38 [1] 35/24 38 years [1] 111/12 39 [2] 142/17 142/22</p> <hr/> <p>4</p> <p>4 February 2010 [1] 55/13 4,000 [4] 148/16 154/1 161/15 163/5 40 [3] 36/24 65/19 149/5 40 years [1] 4/3 400 [1] 78/9 40K [1] 41/23 41 [2] 3/9 159/12 43 [2] 139/25 139/25 44 [2] 10/17 110/13 45 [2] 10/17 119/15 46,000 [1] 40/22 47 [1] 10/21 48 [2] 102/6 121/13 49 [3] 11/14 15/6 102/5</p> <hr/> <p>5</p> <p>5 January 2012 [1] 150/8 5 July 2010 [1] 68/22 5,000 [2] 21/6 21/21 5.11.6 [1] 136/13 50 [1] 105/14 52 [1] 105/20 53 [2] 153/17 166/6 56 [4] 38/1 38/4 56/18 57/4 57 [1] 33/10 58 [1] 125/21 59 [2] 135/24 139/11 592.21 [1] 154/25</p>
---	---	--	---	---

6	above [8] 15/22 43/9 78/10 79/3 80/14 143/20 154/24 156/14	activated [2] 88/10 88/12	affecting [1] 28/16	176/15 177/17 178/8
6 January 2010 [1] 78/3	above-named [1] 80/14	active [3] 151/24 171/1 171/8	affirmed [2] 110/5 181/12	179/6 179/14 179/16 180/2
6 January 2012 [2] 148/6 151/10	absence [1] 30/24	activities [1] 170/17	afford [1] 79/2	allegation [4] 52/12
6,967.28 [1] 79/22	absolutely [3] 40/18 40/20 90/23	activity [4] 22/13 129/21 129/24 135/8	affront [1] 150/3	82/10 141/1 148/5
61 [1] 69/3	abuse [1] 97/11	actual [3] 43/19 44/14 97/16	afraid [3] 27/20 58/20 102/24	allegations [2] 100/2 141/5
63 [1] 96/9	accept [16] 48/14 50/21 54/3 65/5 65/13 68/15 84/23 100/11 100/21 107/17 107/21 156/4 157/14 161/14 163/3 169/4	actually [8] 44/16 44/17 82/2 93/20 138/13 147/4 151/23 156/5	after [15] 23/11 23/18 24/3 46/6 49/3 59/14 61/24 74/1 118/3 120/24 125/3 135/19 138/21 162/10 175/13	allege [1] 51/19
65 [1] 144/13	acceptable [1] 83/11	actus [1] 22/25	afternoon [1] 110/1	alleged [4] 52/2 81/15 82/12 96/24
69 [1] 96/1	Acceptance [1] 16/8	adamant [2] 42/7 46/19	afternoon's [1] 109/19	alleges [1] 79/15
7	accepted [6] 88/9 157/22 169/17 169/19 169/24 178/25	add [5] 17/2 53/10 91/23 93/1 171/25	afterwards [1] 145/16	Allison [1] 71/13
7 days [1] 155/17	accepts [1] 150/2	adding [1] 171/25	again [31] 9/24 21/24 33/24 35/9 40/12 42/25 46/10 46/14 49/6 51/1 54/13 56/12 56/24 56/25 65/16 71/7 81/19 106/12 125/16 128/7 128/10 135/9 137/13 142/15 151/17 158/8 159/14 159/21 170/9 174/2 176/4	allocated [3] 120/9 124/9 168/21
7 minutes [1] 153/17	access [9] 80/8 103/4 124/2 124/5 124/13 124/22 131/14 158/18 162/1	addition [4] 17/7 36/11 69/23 80/25	aggravating [1] 108/6	allow [1] 160/21
700 [1] 2/3	accessible [1] 75/8	additional [2] 15/23 33/25	ago [1] 40/1	allowed [3] 72/2 72/3 72/12
73 [2] 96/2 97/18	accompanied [1] 151/12	Additionally [1] 119/2	agree [2] 49/23 73/21 69/15	almost [3] 17/23 111/12 161/15
75 [1] 75/1	according [1] 51/23	address [7] 10/17 17/25 38/13 44/1 123/19 123/20 124/11	against [4] 53/4 84/24 85/1 148/5	along [5] 32/12 146/20 147/19 151/17 153/15
76 [1] 150/5	Accordingly [3] 26/9 27/13 76/25	addressed [1] 10/13	aggravating [1] 108/6	already [8] 16/2 69/17 69/25 73/15 146/19 151/1 151/14 172/6
79 [3] 71/17 71/18 96/9	account [10] 1/13 40/23 47/15 48/14 76/24 78/9 79/16 91/11 132/19 149/1	adhered [1] 13/3	ago [1] 40/1	also [30] 6/19 9/21 10/4 10/7 11/2 11/23 25/2 26/8 27/12 30/10 39/8 43/14 50/8 51/21 51/24 70/3 75/11 76/6 79/21 80/1 88/21 89/3 117/15 129/19 135/7 135/21 139/17 147/1 153/8 166/15
8	accounted [1] 61/11	adherence [1] 7/24	agree [2] 49/23 73/21 69/15	although [5] 9/16 11/6 11/21 43/22 107/3
8 February [1] 159/11	accounting [14] 22/6 42/5 43/10 76/19 78/13 79/12 79/17 83/9 83/19 84/2 84/23 108/11 142/11 148/3	adhering [1] 19/17	aim [3] 12/23 26/25 154/19	always [12] 2/15 17/13 46/1 74/13 120/19 120/21 121/9 140/17 166/10 167/1 167/2 167/12
80 [2] 72/20 155/25	accounts [3] 76/16 132/23 133/3	adjoining [1] 180/4	Alan [1] 69/11	am [15] 1/2 18/4 47/10 53/5 55/3 55/5 59/22 76/15 79/5 81/4 87/1 111/10 133/13 155/13 180/4
9	Accused's [1] 53/9	adjournment [2] 44/3 109/24	Alison [3] 46/5 46/22 84/15	amalgamation [1] 5/16
9 June 2013 [1] 87/7	achieve [1] 79/25	adjusting [2] 171/19 171/22	Alison Hall [1] 46/22	amended [1] 80/16
9 September [1] 168/2	achieved [1] 23/22	admin [1] 129/25	all [72] 13/4 23/20 25/12 25/15 28/18 30/18 31/3 32/11 36/3 43/10 47/11 47/13 50/23 52/23 57/19 58/18 65/11 71/24 76/20 80/2 82/15 86/6 90/13 91/6 91/14 91/16 92/13 93/24 94/2 94/8 94/19 94/20 101/2 104/13 104/17 106/14 107/16 108/3 108/4 109/9 109/11 109/21 120/11 130/25 131/6 133/5 134/14 136/24 138/10 140/8 140/20 147/11 148/19 154/3 156/5 157/23 160/15 161/18 163/25 165/2 165/10 171/1 171/7 175/1 175/4	amendments [1] 62/21
9.6 [1] 26/24	achievement [1] 24/2	admission [1] 19/21	amount [6] 21/16 61/3 82/7 91/23 93/1 130/5	analysis [4] 9/21 30/5 30/17 30/19
97 [1] 140/1	achievements [1] 23/7	admissions [1] 42/4	amount [6] 21/16 61/3 82/7 91/23 93/1 130/5	Andrew [3] 55/16 68/22 69/9
A	acting [1] 15/11	admissions/denials [1] 42/4	amended [1] 80/16	Andy [3] 55/16 115/3 166/23
abeyance [1] 154/2	action [8] 9/25 70/4 100/17 135/13 138/2 138/13 177/9 178/18	admit [1] 19/19	amendments [1] 62/21	Angela [4] 86/13 111/1 147/12 148/2
able [8] 1/22 53/19 76/15 76/18 77/25	actions [2] 17/6 17/10	admitted [5] 21/7 21/13 21/18 42/5 66/15	amendments [1] 62/21	
about [80] 16/8 17/21 18/1 22/2 22/20 27/21 32/1 37/24 38/25 40/3 40/13 40/15 46/17 48/1 48/3 48/5 50/2 51/2 51/5 52/14 56/21 59/15 59/19 61/24 62/8 65/7 65/11 65/14 67/15 68/16 69/20 71/1 71/14 72/14 73/14 74/5 83/25 85/6 86/19 86/20 86/23 87/8 90/5 90/23 92/17 92/18 95/22 96/21 101/3 101/4 103/23 106/13 106/14 110/22 111/4 111/15 115/20 119/17 127/18 135/3 139/2 139/3 141/5 145/16 146/16 150/6 150/11 150/14 150/18 158/22 159/6 162/15 164/7 166/5 166/5 169/23 171/25 173/10 174/11 175/15		advised [1] 160/20	amendments [1] 62/21	
		advertis [1] 178/11	amount [6] 21/16 61/3 82/7 91/23 93/1 130/5	
		advertising [1] 112/22	analysis [4] 9/21 30/5 30/17 30/19	
		advice [8] 17/1 17/3 17/14 37/4 50/11 78/23 80/25 105/18	Andrew [3] 55/16 68/22 69/9	
		advise [3] 72/23 73/10 78/15	Andy [3] 55/16 115/3 166/23	
		advised [1] 160/20	Angela [4] 86/13 111/1 147/12 148/2	
		affect [1] 141/4		
		affected [4] 59/9 60/18 70/11 149/19		

A	anything [25] 33/1 33/5 47/11 48/11 56/15 70/23 78/20 78/21 84/11 91/20 96/5 99/20 108/15 112/12 116/10 122/18 140/23 140/25 152/8 161/19 161/21 162/8 162/9 162/12 162/21	11/8 13/21 24/20 25/7 27/5 28/20 29/2 45/1 51/1 53/5 53/24 56/24 68/24 69/18 70/3 72/7 79/6 80/21 86/6 88/2 88/21 92/10 99/19 105/25 108/20 108/23 108/23 109/9 110/15 110/17 111/8 114/15 119/11 126/25 137/7 137/24 138/1 138/11 138/12 144/7 144/9 157/3 160/19 160/19 172/15 173/23 178/17 179/14	93/20 94/16 97/21 101/3 102/10 113/16 125/17 126/6 129/20 130/8 132/18 133/22 139/3 140/3 146/20 150/10 151/21 154/5 170/25 171/15 171/17	160/11 163/3 163/13 attending [2] 7/16 146/12 attention [1] 30/5 Attorney [2] 13/25 14/6 attributed [2] 132/10 132/15 attributing [8] 38/7 42/16 56/19 56/22 61/17 63/11 63/25 64/21 audience [1] 29/1 audit [49] 19/4 19/9 21/15 30/2 30/2 30/4 30/23 32/6 32/16 32/17 33/21 34/6 34/14 34/23 35/11 41/23 45/16 46/1 73/19 76/2 77/22 79/17 81/2 82/1 89/6 89/9 90/2 90/8 93/21 94/18 127/21 129/7 129/20 130/7 130/12 131/5 145/5 149/5 150/15 151/1 151/9 151/13 151/16 151/24 152/18 152/25 153/21 154/8 164/23 audit had [1] 151/1 audited [1] 149/4 auditor [6] 31/9 31/23 32/18 52/1 149/9 168/9 auditor's [1] 39/5 auditors [10] 19/12 19/14 19/20 20/7 20/12 41/24 130/18 131/3 151/8 152/21 August [3] 80/11 112/17 136/10 authorisation [1] 137/3 Authority [4] 37/6 37/10 37/12 106/16 Authority 01 [1] 106/16 available [5] 2/4 12/20 31/5 122/21 131/8 Avenue [1] 69/19 awaiting [1] 160/14 aware [53] 11/4 11/20 13/10 13/15 14/5 14/10 18/22 19/20 19/24 23/15 29/9 33/20 33/25 34/5 34/13 34/18 35/10 35/13 35/14 35/15 35/19 44/12 50/5 50/8 50/10 50/14 54/4 63/21 63/25 65/22 67/22 76/10 76/12 76/16 77/11 90/12
Animals [2] 148/9 148/23 Ann [1] 156/22 Anne [4] 111/2 147/13 148/2 155/5 announcement [3] 1/7 1/9 181/2 anomalies [1] 30/6 another [14] 61/15 91/25 94/1 94/17 105/6 123/18 128/10 140/14 140/22 142/6 143/3 157/22 158/8 160/6 answer [5] 20/2 67/24 99/17 99/23 159/20 answered [3] 78/19 90/19 96/21 answers [1] 55/8 anticipated [1] 2/15 anxiety [1] 104/10 any [109] 7/10 7/14 9/8 10/24 14/21 16/8 16/13 17/12 18/23 18/24 19/13 20/3 20/4 22/6 27/15 27/16 27/21 28/3 30/24 37/16 44/21 45/3 45/17 45/24 47/9 49/20 50/18 50/22 51/19 52/4 57/2 57/20 61/10 64/9 64/13 64/14 65/22 66/18 69/16 70/3 70/23 74/10 81/23 81/24 83/25 85/8 85/22 86/2 86/7 95/17 97/16 98/2 99/1 102/24 104/11 108/8 109/6 112/14 115/15 117/23 118/1 118/11 122/11 122/14 126/5 127/3 127/14 128/8 128/23 129/12 131/12 132/20 133/4 133/19 134/15 135/2 135/3 135/8 136/17 141/3 141/14 143/25 144/17 145/16 145/22 147/7 147/9 151/24 160/19 161/5 162/1 163/25 164/9 164/16 164/25 166/8 166/23 168/19 172/10 172/25 174/22 175/7 175/11 175/14 175/24 177/10 179/3 179/9 179/10 anybody [3] 33/17 40/25 109/3 anyone [6] 45/8 45/12 57/20 64/9 109/8 134/15	anyway [3] 126/10 151/22 164/13 apologies [4] 25/9 25/13 38/3 42/25 apologise [3] 8/3 28/11 99/23 apparent [9] 19/5 21/15 28/5 36/3 73/17 73/20 127/20 155/20 157/20 apparently [2] 74/4 169/23 Appeal [7] 97/8 97/10 97/24 98/1 98/9 100/10 147/18 appear [3] 77/21 82/3 177/19 appearance [1] 126/25 appeared [1] 104/3 appears [3] 82/11 123/19 169/17 Appendix [1] 76/13 Appendix B [1] 76/13 appetite [1] 178/14 applications [1] 27/5 applied [3] 4/9 13/15 113/8 apply [2] 112/23 112/25 applying [1] 85/9 appointed [2] 112/16 113/17 appreciate [3] 99/2 99/16 100/16 approach [4] 19/10 19/11 45/23 144/12 appropriate [8] 27/5 54/23 79/12 104/12 113/7 136/24 142/8 143/5 appropriateness [1] 84/1 approximately [1] 114/8 April [8] 28/15 57/16 59/14 77/7 112/16 134/11 144/5 147/25 April 2010 [1] 112/16 April 2013 [2] 144/5 147/25 archive [1] 30/13 archived [1] 33/1 are [54] 1/18 1/19 3/16 3/18 10/1 11/8	area [4] 112/3 117/7 154/16 154/19 areas [2] 119/1 136/22 aren't [2] 7/10 63/18 argue [2] 104/23 107/19 arise [1] 110/23 arising [2] 16/9 89/15 around [15] 6/9 9/2 9/5 36/21 63/13 88/5 89/8 90/7 95/13 145/6 170/4 170/21 172/25 173/6 174/9 ARQ [28] 30/14 33/6 33/15 33/23 34/3 58/16 69/1 69/16 70/9 70/12 71/5 71/9 71/9 75/7 75/11 75/17 131/16 131/22 131/25 132/1 132/12 132/14 133/1 133/5 133/8 134/2 134/7 139/17 ARQs [1] 69/21 arrange [3] 19/10 103/22 157/10 arranged [2] 103/3 151/1 arrangements [1] 160/25 arrested [1] 106/19 arrival [2] 19/23 102/9 arrived [1] 151/13 articles [3] 55/24 56/9 88/22 as [202] aside [1] 104/14 ask [21] 17/13 52/24 86/19 86/23 89/12 90/22 91/25 95/2 95/22 98/5 101/2 101/6 101/7 108/8 111/3 111/15 127/18 129/7 140/7 164/6 166/4 asked [28] 16/22 19/18 30/8 52/25 64/12 84/22 91/18	ask [10] 2/24 40/12 48/13 82/24 82/25 99/3 110/20 110/22 173/8 173/12 asks [1] 39/1 aspect [1] 145/22 aspects [2] 8/20 122/17 assertion [1] 64/11 assess [1] 1/20 assessed [2] 11/1 23/16 assessing [1] 50/18 assessor [1] 8/16 assets [4] 26/4 27/4 27/8 27/24 assist [5] 3/3 32/23 137/19 153/7 160/4 assistance [3] 61/12 147/7 179/8 assistant [5] 4/11 4/17 7/13 38/6 56/19 assists [1] 82/9 associate [2] 15/17 88/16 associated [2] 87/22 90/8 assume [7] 20/3 20/5 158/16 159/5 159/16 159/25 161/12 assuming [1] 177/24 assumption [1] 54/20 assurances [2] 167/5 167/5 assured [4] 166/10 166/20 167/8 167/12 at [270] at page 2 [1] 87/4 ATM [1] 155/22 attached [6] 24/22 53/1 53/15 79/4 126/7 168/12 attaching [1] 62/6 attachment [2] 24/23 54/17 attend [5] 121/5 129/8 129/20 130/8 147/3 attendance [3] 60/5 99/8 145/4 attended [19] 9/17 43/12 96/16 96/23 121/1 122/6 146/3 146/17 147/1 151/9 153/3 153/15 154/9 155/19 156/18 157/19	

A	30/24 BBC [1] 55/25 be [196] bearing [2] 77/3 79/10 became [7] 6/6 6/8 111/17 114/18 115/1 128/12 132/4 because [47] 2/13 19/25 22/16 29/12 30/7 33/19 35/13 36/18 39/7 41/4 45/25 47/12 48/20 49/22 62/12 63/22 64/1 73/13 84/9 85/15 85/18 85/21 94/8 94/18 99/18 108/4 116/11 124/7 125/14 128/7 132/14 132/17 134/7 138/4 139/5 147/4 151/21 152/22 157/22 159/3 162/21 163/16 169/6 170/10 171/14 178/20 179/7 become [1] 172/11 becoming [1] 61/1 been [138] 2/11 8/7 9/2 11/4 11/20 13/14 17/6 19/25 20/4 20/5 20/6 22/6 23/10 23/18 24/2 24/9 25/22 26/12 28/22 28/23 28/24 29/8 29/9 30/14 31/24 34/7 34/16 36/7 36/8 38/17 46/7 46/12 48/1 48/2 51/17 52/25 54/18 57/1 57/3 62/16 66/1 66/3 67/16 67/17 69/15 69/17 69/22 70/7 70/20 75/6 76/10 76/12 76/16 76/23 77/11 77/17 77/18 77/25 79/25 80/16 85/18 85/19 85/21 90/14 90/15 90/15 91/17 93/6 93/17 93/17 94/23 95/10 96/24 98/7 98/20 103/18 103/21 104/7 105/8 111/12 115/8 116/12 117/13 117/22 124/21 125/10 125/12 125/13 127/25 130/6 131/10 135/1 137/10 139/4 139/5 140/17 140/22 140/23 143/19 146/10 146/19 147/4 149/18 151/1 151/7 156/7 156/8 156/15 156/19 156/21 156/24 157/21 158/18 158/19 159/1 159/6 159/13 159/14 159/15 159/24 160/7 161/23 162/7	162/15 164/17 168/5 168/7 168/20 168/21 175/13 175/19 176/4 176/5 177/7 177/14 177/18 178/5 179/6 before [32] 1/8 2/9 19/18 19/22 23/5 31/5 34/24 35/4 35/7 38/5 55/9 83/14 86/7 94/7 111/21 120/16 125/11 126/3 128/22 129/12 129/15 139/21 140/11 140/18 141/12 141/15 145/14 146/16 148/1 151/6 164/17 179/10 began [1] 149/14 begin [2] 21/19 129/8 beginning [6] 40/3 80/19 92/10 92/12 93/16 94/24 behalf [5] 2/25 29/13 33/3 98/5 110/21 behind [2] 73/9 121/17 being [61] 1/14 7/25 8/8 15/1 21/8 21/13 23/9 25/5 25/17 27/21 29/5 29/17 30/24 31/8 31/25 37/19 41/11 44/12 45/17 45/19 47/22 51/6 52/14 53/21 58/8 64/23 65/6 65/22 67/23 68/3 69/8 72/5 91/20 104/4 106/9 109/1 111/19 115/3 117/14 118/7 118/11 119/11 124/20 127/13 129/17 130/4 133/2 134/1 134/6 134/20 139/22 141/13 143/23 144/14 148/24 151/20 152/9 166/9 169/24 170/21 173/18 belief [3] 3/17 84/3 110/16 believe [39] 7/19 8/7 8/15 9/10 9/10 13/13 14/12 16/16 17/3 19/2 20/13 23/25 25/21 35/23 38/20 44/16 45/6 52/6 52/8 64/12 73/7 74/20 74/23 74/24 77/10 84/18 90/11 95/15 106/4 106/11 107/22 108/3 108/3 109/2 119/15 128/15 132/25 140/5 170/12 believed [4] 57/8 78/2 96/23 98/24 believes [2] 107/7 107/8 belittle [1] 107/24 below [6] 55/14	55/15 61/7 68/23 69/10 83/13 beneath [1] 68/25 benefit [5] 18/15 27/15 100/9 144/17 179/2 beside [3] 137/24 172/15 174/2 best [2] 3/17 110/16 better [1] 178/24 between [16] 2/4 16/25 21/11 32/3 57/21 58/5 58/9 61/22 80/16 117/1 134/16 134/21 145/2 148/6 148/24 173/2 beyond [2] 167/2 178/8 big [1] 66/5 Birkenshaw [1] 146/2 bit [10] 62/25 104/3 115/21 121/25 135/19 137/5 156/14 156/18 156/19 156/21 bits [2] 51/5 98/25 blaming [2] 63/7 63/18 blank [1] 126/22 block [2] 160/14 160/22 body [1] 134/13 bonuses [1] 23/21 book [1] 13/14 boots [1] 162/12 borrow [1] 122/5 both [10] 6/16 10/6 25/6 28/20 69/7 88/17 143/21 144/24 153/3 176/9 bottom [24] 12/10 22/2 24/16 43/1 47/6 49/7 56/2 60/6 62/5 63/15 74/11 75/21 87/14 95/7 117/4 117/5 123/12 136/8 136/12 139/25 144/10 156/9 156/18 160/5 box [2] 160/6 160/8 Bradshaw [30] 55/12 59/14 59/21 60/2 101/15 103/22 106/6 107/25 115/11 120/13 120/21 121/1 121/8 146/5 146/13 150/7 150/19 150/25 151/5 151/11 151/12 152/2 152/6 152/9 152/24 153/15 153/20 163/5 163/13 164/15 branch [54] 6/19 28/6 28/7 28/8 28/9 30/3 30/4 30/5 30/7 30/17 30/18 31/10	31/12 31/25 32/2 32/8 34/24 36/1 39/13 42/19 53/21 60/10 76/9 77/12 88/19 89/1 89/24 94/8 94/9 112/9 112/12 130/4 148/11 148/14 149/4 151/1 151/10 151/13 154/9 155/8 157/4 157/9 158/17 159/16 159/25 161/8 161/10 161/11 163/14 163/19 164/13 164/17 165/25 168/7 branches [11] 6/16 6/17 10/1 88/24 89/5 89/5 89/11 90/4 112/14 139/4 165/24 break [5] 54/23 55/4 55/9 165/6 165/13 brief [3] 41/21 42/3 112/6 briefly [1] 145/1 bright [1] 53/11 bring [3] 26/16 72/2 87/4 brought [5] 20/1 20/10 36/19 70/21 136/15 BT [2] 39/13 78/3 bug [2] 133/7 141/1 bugs [1] 141/3 build [1] 106/25 building [4] 9/18 44/18 92/14 103/19 buildings [2] 103/24 105/8 bullet [1] 23/8 bundles [2] 77/6 80/22 burden [1] 178/7 business [33] 4/22 5/14 5/15 5/18 26/5 27/3 27/9 27/17 27/24 29/3 29/20 30/20 31/17 32/5 32/20 56/12 57/1 57/10 57/12 65/3 65/12 66/17 66/20 66/24 67/13 67/14 68/4 68/8 68/16 85/24 105/8 149/15 167/3 busy [1] 170/19 but [131] 6/24 8/12 8/17 8/23 12/17 14/9 15/16 17/15 20/3 20/5 20/16 20/19 21/20 21/22 21/22 21/24 23/4 23/14 26/2 28/10 35/17 35/18 37/13 39/18 40/5 44/16 44/18 44/19 44/20 45/1 47/11 48/17 49/19 51/1 52/9 53/4 54/7 56/2 56/9 56/11
----------	--	---	--	---

B
but... [91] 56/15
 56/25 57/13 63/17
 64/8 64/16 65/2 66/8
 67/1 67/1 67/11 67/19
 68/4 70/14 71/5 71/9
 72/3 74/25 75/7 77/24
 83/9 84/23 85/1 85/5
 87/24 91/22 92/21
 93/1 93/6 94/3 97/3
 98/24 99/7 100/24
 102/19 105/4 106/10
 107/4 107/21 108/18
 109/5 111/23 112/22
 114/11 115/24 116/22
 117/9 117/23 120/21
 122/17 124/5 125/24
 126/11 126/12 128/1
 128/9 128/23 133/4
 135/20 137/13 138/12
 141/15 142/10 143/8
 145/10 147/22 148/14
 151/23 152/17 154/11
 155/21 156/25 157/1
 157/25 158/20 158/23
 159/1 162/23 162/24
 164/14 164/19 165/5
 167/2 169/22 172/2
 174/19 174/25 175/14
 176/9 177/19 177/24
Byfleet [1] 69/19

C
call [10] 1/6 35/25
 36/3 36/11 36/11
 64/12 68/13 69/12
 84/21 110/4
called [9] 5/15 19/9
 19/21 20/9 37/13
 89/18 106/15 118/8
 138/4
calling [1] 93/18
calls [4] 64/14 64/17
 88/25 167/7
came [9] 5/10 10/25
 94/7 113/6 138/21
 161/25 167/1 167/2
 170/19
cameras [1] 158/20
can [149] 1/3 1/5
 2/14 11/6 11/21 12/10
 12/10 22/16 23/1
 24/10 24/15 24/22
 25/4 25/16 25/19
 26/21 31/8 40/15
 42/24 45/3 45/8 45/17
 47/5 49/15 52/24
 53/19 55/6 55/15
 58/18 61/25 67/14
 72/1 72/5 72/10 72/18
 75/13 75/20 77/1
 78/10 78/12 78/20
 79/7 82/1 82/2 84/20

86/23 87/3 87/4 87/5
 87/13 87/15 87/18
 87/20 89/7 90/17
 90/24 91/5 91/8 91/10
 91/12 91/13 91/14
 92/3 93/13 93/14
 93/15 94/21 97/18
 99/24 101/13 101/24
 102/6 105/13 105/24
 109/18 110/1 110/3
 112/6 115/18 116/24
 117/3 117/11 117/20
 118/15 118/19 119/14
 121/20 122/13 123/3
 123/10 123/12 123/18
 124/6 124/18 126/5
 126/24 127/3 127/13
 128/8 128/16 129/9
 129/23 135/6 136/4
 136/8 136/12 137/6
 137/11 137/15 138/18
 141/9 142/13 142/18
 144/20 145/1 146/14
 150/4 152/5 153/13
 154/14 154/16 156/11
 156/22 158/16 159/8
 159/20 159/21 159/23
 160/22 161/19 164/9
 164/15 165/15 166/19
 167/25 168/3 169/10
 170/23 172/16 173/5
 174/4 175/1 175/3
 175/9 175/25 176/24
 177/16 178/1 179/1
can't [35] 8/2 20/2
 20/4 34/4 36/13 36/15
 41/9 49/20 67/1 67/10
 67/19 70/18 82/20
 91/19 93/24 96/5
 104/23 105/12 107/19
 114/10 119/7 119/7
 122/17 126/12 128/23
 142/14 143/12 152/7
 152/16 157/25 158/6
 159/2 169/11 169/20
 174/25
Canner [1] 39/18
cannot [6] 9/16 10/3
 80/17 103/4 140/8
 158/21
Card [2] 24/14 78/9
cards [2] 39/22
 149/12
career [4] 3/22
 111/12 117/13 171/15
careful [1] 173/3
carry [3] 167/3
 169/15 170/9
Cartwright [7] 10/7
 10/11 10/12 121/14
 121/23 122/9 122/18
Cascade [1] 172/8
case [127] 2/2 10/24
 15/1 15/3 15/5 15/12

17/1 17/4 17/21 17/21
 21/10 22/4 22/10 24/8
 26/12 26/23 28/16
 28/21 29/25 33/16
 33/18 37/4 37/5 41/21
 43/8 43/15 43/17
 44/13 45/9 45/18
 45/22 46/7 49/3 50/7
 50/8 50/9 51/13 52/4
 53/7 54/2 57/5 59/16
 62/4 62/8 63/10 64/2
 64/6 64/19 65/13 70/2
 71/15 71/25 74/3
 74/16 74/21 75/4
 75/16 80/5 81/4 81/10
 82/5 82/15 84/14
 84/16 85/13 85/15
 85/17 96/10 96/14
 98/16 98/20 100/12
 100/22 111/1 112/13
 120/21 123/15 125/8
 128/6 128/11 130/21
 131/18 131/24 132/8
 132/16 133/12 133/19
 135/11 135/12 137/1
 137/13 139/15 140/7
 140/13 140/22 141/15
 141/16 141/18 143/11
 145/3 145/14 145/23
 146/1 146/13 146/15
 146/16 146/19 146/23
 147/2 147/10 147/12
 150/7 151/19 164/21
 165/1 168/16 168/19
 170/22 170/24 171/2
 171/4 171/6 171/10
 172/4 173/11 178/6
 178/15
cases [42] 17/8
 17/10 17/19 23/10
 23/17 24/3 30/23 31/3
 36/3 38/13 45/24 50/5
 53/1 53/19 53/22 54/2
 54/5 54/18 64/20
 67/22 69/18 81/5 86/1
 120/9 120/11 127/24
 128/8 140/8 140/17
 144/22 144/24 168/21
 171/2 171/8 173/22
 174/5 174/6 174/16
 176/7 176/9 178/9
 178/12
casework [5] 17/2
 69/24 124/23 125/1
 128/1
cash [23] 5/15 5/17
 5/17 6/3 6/4 8/18 8/24
 30/7 31/24 41/3 41/7
 60/25 61/3 61/4 79/23
 80/8 91/11 129/2
 130/2 130/3 130/5
 131/4 155/13
catch [1] 91/6
categorise [1] 42/15

Catherine [1] 59/23
cause [6] 44/21
 45/22 69/13 73/17
 73/20 134/24
caused [7] 1/10 2/12
 41/12 42/10 160/18
 161/15 162/17
caution [2] 105/16
 122/4
cautioning [1] 19/17
cc'd [1] 123/14
cancel [1] 172/24
censure [2] 172/9
 172/23
cent [8] 48/13 48/20
 48/24 49/22 51/2
 64/11 116/22 157/1
centrally [3] 128/9
 159/17 160/1
centre [4] 6/4 30/22
 62/2 129/25
centred [1] 118/22
Centres [1] 5/17
certain [8] 8/20 21/12
 21/22 120/1 131/18
 171/25 177/18 177/25
certainly [10] 21/23
 22/16 23/15 68/6
 86/11 132/3 135/20
 165/7 175/14 179/7
certainty [1] 152/16
certifying [1] 14/23
cetera [5] 131/4
 139/4 158/20 167/15
 167/16
CH [2] 8/18 8/18
chain [1] 61/21
chair [2] 21/14
 102/10
challenge [3] 51/21
 140/6 140/21
challenged [4] 81/6
 81/10 82/5 98/9
challenges [9] 55/14
 55/17 56/3 56/5 56/6
 57/2 65/23 65/24 66/1
challenging [1] 68/4
Chan [2] 51/11 83/14
chance [3] 38/18
 46/14 49/11
change [6] 5/7 5/9
 5/11 5/12 94/15
 153/24
changed [4] 5/8 6/24
 17/15 128/16
changes [1] 5/10
changing [1] 94/13
chap [1] 105/22
Chaplin [1] 84/21
characterising [1]
 63/9
charge [7] 79/3 80/15
 80/15 81/21 82/22
 155/4 155/7

charged [1] 148/4
charges [7] 78/13
 78/16 79/13 108/12
 142/7 143/4 143/8
charging [1] 50/12
charity [1] 148/9
charity's [1] 149/1
check [4] 36/9 62/16
 91/6 163/18
checked [5] 53/4
 115/19 154/3 160/15
 164/4
checking [2] 93/14
 164/12
checklist [1] 17/5
checks [6] 125/2
 125/6 162/1 164/6
 164/7 164/10
cheque [1] 149/6
cheques [2] 91/22
 92/25
Chester [2] 43/11
 43/12
Chesterfield [17]
 9/17 93/25 94/17
 129/25 130/1 156/25
 157/2 157/4 157/6
 159/17 160/2 160/13
 160/21 160/25 162/4
 162/8 162/14
Chris [5] 24/14 62/20
 83/20 83/23 84/7
Christmas [1] 9/24
CHRISTOPHER [5]
 2/21 3/2 59/25 101/18
 181/4
circulated [1] 127/15
circumstance [1]
 164/14
circumstances [19]
 20/23 34/22 36/6
 36/10 70/25 72/10
 80/6 104/16 130/6
 131/19 131/20 132/1
 132/5 150/1 150/20
 152/5 155/3 157/3
 169/2
Circumstantial [1]
 77/24
civil [5] 178/7 178/9
 178/12 178/18 178/21
CK [1] 55/22
claims [3] 65/1 67/4
 99/10
clarify [1] 14/2
clarity [2] 89/22
 177/19
clear [7] 11/8 27/2
 79/6 90/24 102/2
 140/15 163/24
cleared [2] 155/20
 157/20
clearly [4] 80/17 83/8
 114/11 137/1

C	27/13	conditions [3] 85/9 85/22 168/12	controlled [1] 173/7	68/16 68/20 69/25
clerk [2] 111/6 148/13	committed [1] 22/6	conduct [4] 13/8 18/2 122/21 136/5	convenient [1] 165/4	70/1 71/16 72/23
clerks [1] 174/7	committing [2] 26/7 27/11	conducted [7] 16/23 43/13 46/5 76/21 87/9 97/23 179/4	conversation [2] 51/16 152/24	73/10 75/1 75/19 76/11 77/8 78/22
client [3] 72/23 73/10 102/23	common [1] 162/24	conducting [5] 37/15 37/21 115/25 116/7 135/22	conviction [5] 79/2 97/6 97/7 97/10 126/18	79/13 80/1 80/11 80/25 81/17 82/8 82/12 82/22 83/3
close [1] 121/9	comms [2] 88/22 88/23	conducts [1] 29/13	convictions [2] 86/16 147/19	84/13 85/3 93/4 96/7 101/6 101/7 101/8
closure [2] 28/21 28/24	communicated [1] 46/7	conference [2] 69/12 167/6	convinced [2] 74/18 74/22	102/5 102/14 106/10 110/7 112/12 118/14
closures [1] 28/16	communication [5] 24/24 24/24 24/25 26/3 26/19	confirm [4] 3/1 70/2 82/1 110/7	cop [1] 100/14	122/25 123/11 124/5
Code [2] 13/11 14/11	compared [1] 31/25	confirmed [4] 77/17 83/20 84/7 101/21	copied [3] 43/5 51/12 76/1	124/11 124/12 124/13
codes [11] 7/22 12/12 13/3 125/19 126/9 126/15 127/1 127/4 127/8 127/12 127/15	comparison [3] 32/3 56/12 104/17	confusion [1] 72/18	copy [5] 3/6 3/11 23/2 23/5 51/17	124/23 126/21 126/23
coffee [1] 17/23	Compensation [3] 26/11 26/22 27/6	connect [1] 124/7	Core [4] 1/11 86/8 109/10 179/11	131/12 132/20 134/2
cognitive [1] 118/23	complaint [3] 148/22 151/3 169/23	connected [2] 39/7 39/8	corporate [1] 4/20	134/6 134/9 137/5
coincidence [1] 151/4	complaints [2] 18/1 112/13	conscious [1] 35/20	correct [47] 3/13 3/25 4/7 4/13 6/5 6/15 6/20 7/7 7/10 62/16 70/23 75/18 78/3 111/5 111/8 113/9 113/24 114/20 115/5 116/18 117/24 118/5 123/6 123/25 124/16 126/19 132/22 133/20 135/21 141/10 142/4 144/24 146/3 147/1 150/8 151/2 151/9 151/14 152/3 152/13 153/2 153/9 165/22 166/18 175/12 176/10 180/1	139/24 142/3 142/24 144/3 144/6 145/9 147/16 147/20 149/16
collapse [1] 178/10	complete [8] 17/16 26/8 27/12 30/8 62/14 73/18 141/11 156/6	consent [2] 37/8 37/23	correct [47] 3/13 3/25 4/7 4/13 6/5 6/15 6/20 7/7 7/10 62/16 70/23 75/18 78/3 111/5 111/8 113/9 113/24 114/20 115/5 116/18 117/24 118/5 123/6 123/25 124/16 126/19 132/22 133/20 135/21 141/10 142/4 144/24 146/3 147/1 150/8 151/2 151/9 151/14 152/3 152/13 153/2 153/9 165/22 166/18 175/12 176/10 180/1	153/11 154/3 154/4 154/15 157/13 158/7 158/17 158/18 159/19 160/5 161/18 161/22 161/25 162/13 162/21 164/6 165/5 167/24 170/14 171/2 172/3 172/6 172/11 173/24 176/22 178/11
collate [1] 53/13	completed [11] 15/8 15/14 17/6 50/4 76/9 77/12 84/16 141/15 158/23 161/24 162/3	consider [5] 31/15 32/3 74/10 79/12 158/7	correction [2] 157/22 160/14	176/22 178/11
colleague [1] 71/25	completely [2] 66/3 74/4	considerable [1] 61/5	corrections [4] 42/1 42/11 88/2 157/24	couldn't [12] 21/22 77/16 93/4 106/4 124/2 124/5 124/16 124/17 163/1 164/4 165/21 176/16
Collins [2] 55/17 69/8	completeness [1] 166/3	considered [9] 24/1 32/19 44/1 50/18 128/5 140/5 142/8 175/4 177/14	corrective [1] 70/4	counsel [5] 43/21 43/25 51/11 85/18 102/21
colour [1] 105/25	completing [4] 8/13 11/18 15/10 15/19	Consignia [1] 13/4	corrected [1] 52/9	count [3] 32/8 54/1 148/3
column [2] 53/12 53/20	compliance [4] 17/4 124/24 125/1 125/2	consistent [1] 66/17	correction [2] 157/22 160/14	counter [4] 9/18 16/3 31/9 111/6
columns [1] 53/20	comprehended [1] 54/9	contact [5] 60/11 130/24 155/16 156/15 167/10	correctly [1] 17/7	counterfeit [1] 4/24
come [35] 17/12 30/4 42/8 42/11 47/5 53/1 53/25 54/6 57/12 66/4 86/25 97/3 109/18 117/20 119/14 122/13 123/10 124/18 135/6 137/12 138/5 138/18 141/9 144/20 146/20 149/23 150/4 151/21 154/14 157/2 159/4 160/20 162/19 175/3 179/1	computer [6] 41/12 41/12 55/25 60/19 97/4 153/24	contacted [5] 130/20 148/21 150/19 160/18 161/21	correspondence [1] 46/8	country [1] 5/4
come' [1] 106/3	computers [1] 48/21	contain [1] 141/18	corresponding [1] 69/22	counts [1] 43/10
comes [1] 78/18	conceal [1] 29/19	contained [5] 33/22 34/1 50/13 52/11 54/17	corroborate [1] 97/13	couple [2] 28/22 154/11
comfortable [1] 117/15	concede [2] 50/25 65/18	containing [1] 61/22	Cost [1] 27/6	course [18] 7/17 8/1 8/9 9/22 16/15 18/14 29/10 57/12 80/20 81/6 99/2 118/4 118/17 118/19 118/21 136/19 140/24 142/16
coming [6] 3/3 66/21 67/8 109/15 167/20 179/18	concern [8] 44/21 58/18 70/6 70/18 82/21 88/3 134/24 145/21	content [8] 12/15 20/22 26/2 56/8 60/5 90/12 90/13 118/20	costs [3] 26/11 26/23 27/16	courses [1] 121/18
commence [2] 127/22 128/2	concern' [1] 89/7	contents [2] 3/16 110/15	could [124] 2/25 9/11 10/20 12/4 16/19 17/13 19/5 23/14 24/12 24/25 26/20 28/12 29/22 32/25 33/2 33/10 34/6 34/13 35/17 36/24 38/1 38/9 38/25 40/11 41/16 42/22 46/2 46/16 48/25 51/9 52/17 53/10 53/15 54/25 57/13 59/11 59/18 60/13 61/20 65/19	court [31] 22/10 23/11 23/19 24/8 27/6 37/6 43/11 43/12 44/18 44/18 53/7 62/10 62/24 63/5 69/19 69/23 70/1 70/7 70/21 84/22 97/7 97/10 97/24 98/1 98/8 100/10 147/2 147/18 147/18 147/25 178/6
commenced [1] 129/17	concerned [5] 58/21 70/19 98/7 160/17 162/15	context [5] 9/14 32/2 48/23 66/8 155/7	could [124] 2/25 9/11 10/20 12/4 16/19 17/13 19/5 23/14 24/12 24/25 26/20 28/12 29/22 32/25 33/2 33/10 34/6 34/13 35/17 36/24 38/1 38/9 38/25 40/11 41/16 42/22 46/2 46/16 48/25 51/9 52/17 53/10 53/15 54/25 57/13 59/11 59/18 60/13 61/20 65/19	court's [1] 149/24
commencement [1] 79/5	concerns [14] 30/6 30/12 30/17 30/24 64/23 65/6 65/14 71/1 89/8 89/10 90/3 96/25 98/2 136/18	contingent [1] 84/2	continued [1] 170/13	courtroom [1] 147/5
comment [14] 20/11 20/12 45/5 45/22 48/5 48/11 50/1 51/2 69/2 74/3 105/12 105/18 117/5 125/21	concertina [1] 105/10	continue [5] 37/8 37/23 78/12 113/5 176/19	continuing [1] 168/18	
comments [8] 17/2 19/13 19/15 50/9 106/9 167/14 172/11 172/25	concluded [3] 37/2 54/15 168/5	Contract [3] 18/7 21/8 168/22	contracts [2] 168/10 169/16	
commercial [2] 26/9	conclusion [3] 141/25 142/24 149/25			

C	106/22	day [17] 2/13 2/17 31/13 52/11 83/14 98/15 98/16 100/16 100/25 102/25 121/24 130/9 150/15 151/2 151/5 153/4 179/24	delaying [1] 149/14 deliberately [1] 107/8 deliver [1] 121/15 delivered [3] 107/22 118/7 122/8 delivering [1] 118/12 Delivery [2] 5/2 59/24 demands [1] 2/7 denials [1] 42/4 denied [2] 42/7 61/10 Denise [2] 93/25 94/16 Department [4] 4/10 4/20 4/21 5/7 depended [1] 131/23 dependent [2] 102/7 103/2 depends [1] 131/20 deposit [3] 148/7 149/6 152/12 deposited [1] 148/25 deposits [2] 149/8 149/15 depression [1] 104/11 Deprived [1] 165/22 depth [2] 115/15 126/12 derived [1] 45/16 describe [1] 152/5 described [2] 13/1 24/14 describing [2] 107/3 107/4 description [3] 106/2 112/6 162/6 Designated [3] 37/6 37/10 37/11 desk [1] 117/14 despite [1] 51/16 detail [3] 47/12 49/22 136/23 detailed [3] 34/23 66/7 118/25 details [11] 20/17 47/13 47/20 53/7 128/23 154/23 156/6 158/10 158/24 159/11 159/16 determine [1] 21/1 determined [1] 89/4 deterrent [2] 26/7 27/11 devastating [1] 178/12 device [1] 124/14 devices [1] 124/3 Dianne [4] 51/11 51/15 83/14 83/16 Dickinson [3] 114/24 166/25 168/2 dictates [1] 178/14 did [82] 4/23 5/9 7/13 8/11 12/13 12/15	14/10 15/8 15/20 18/22 28/3 30/19 31/3 31/5 31/15 32/2 37/15 37/19 44/21 45/22 47/21 48/10 56/5 58/18 60/17 64/9 67/13 67/21 70/18 71/2 73/17 74/6 74/10 74/20 82/16 82/21 83/25 93/2 94/5 98/2 99/9 100/18 103/22 111/18 111/23 113/12 115/24 116/8 118/1 120/3 121/17 122/16 125/10 126/13 128/23 131/17 132/14 133/2 134/24 135/20 138/24 143/25 144/17 146/12 146/16 147/3 147/9 150/13 151/19 156/5 163/13 163/18 164/6 164/25 171/3 173/14 173/18 175/19 175/24 176/13 177/21 178/19 didn't [28] 8/12 49/25 50/1 63/15 64/22 64/22 68/7 74/9 82/19 91/19 92/17 93/2 94/2 95/8 98/11 103/22 116/9 116/13 117/11 117/14 127/7 128/7 128/8 128/20 151/23 154/10 163/25 164/19 died [1] 97/8 differed [1] 61/6 difference [1] 145/1 different [8] 6/25 56/15 77/22 100/20 128/24 128/25 131/15 131/19 difficult [4] 60/21 61/1 74/20 99/17 difficulties [1] 150/17 digest [1] 2/9 diminished [1] 19/12 direct [2] 80/12 167/10 directed [2] 152/11 152/20 directly [3] 6/16 10/1 48/15 disability [1] 158/18 disabled [4] 102/8 103/1 104/12 105/2 discharged [1] 11/18 disclose [1] 82/7 disclosing [1] 15/15 disclosure [33] 1/14 1/20 2/4 7/25 8/4 8/10 10/9 11/17 11/19 11/20 12/2 12/7 13/1 13/20 14/1 14/3 14/7 14/15 14/18 14/25 15/2 15/7 15/10 15/11
cover [4] 22/24 28/10 53/5 139/1 covered [14] 5/3 8/1 8/7 10/6 10/8 22/7 41/5 41/6 43/24 118/21 119/12 120/11 120/12 136/23 covering [6] 7/21 8/20 9/25 59/20 139/8 149/14 covers [2] 75/9 81/21 Credence [25] 30/11 30/16 31/1 31/5 31/15 32/1 32/11 33/13 57/17 57/21 58/6 58/9 58/15 59/2 59/15 61/24 75/6 75/9 75/13 75/17 131/15 131/21 134/12 134/16 134/21 credit [1] 149/12 crime [5] 19/19 22/5 26/8 27/12 114/1 criminal [39] 6/2 6/13 7/14 7/21 7/24 9/9 12/11 13/2 13/7 13/10 13/22 14/22 16/23 26/4 27/8 27/23 43/2 45/4 45/12 49/2 50/11 50/17 66/8 75/22 78/15 78/23 82/10 116/7 118/1 122/22 127/22 128/20 129/17 136/5 143/15 155/10 170/7 178/6 179/4 criminality [2] 21/9 27/16 criminally [2] 46/20 46/24 crippling [1] 104/10 criteria [2] 21/21 21/23 Crown [13] 6/17 14/11 18/12 18/22 18/25 38/7 43/11 43/12 56/19 77/15 84/22 101/17 147/25 culture [2] 22/11 29/18 cupboard [1] 149/7 current [11] 5/23 7/5 7/8 17/14 56/16 75/10 80/15 81/21 104/24 160/7 177/1 currently [2] 69/18 114/12 custody [1] 106/20 customer [2] 29/4 112/12 CV [2] 23/2 24/5	Daily [11] 39/1 39/10 39/20 39/24 40/12 41/2 96/19 99/4 100/11 100/18 115/12 Daley [4] 41/6 55/17 68/22 69/9 DAM [1] 37/7 damage [1] 2/11 dare [1] 46/24 dark [1] 74/5 Darlington [7] 41/20 43/8 43/23 44/7 46/7 50/9 74/2 Darlington's [2] 50/7 54/2 data [94] 9/21 16/15 16/17 30/11 30/12 30/13 30/16 30/16 31/1 31/5 31/16 31/19 31/21 32/1 32/11 32/11 32/13 32/13 32/15 32/23 33/1 33/6 33/13 33/15 33/19 33/21 33/25 34/9 34/9 34/14 34/20 34/23 35/21 45/14 45/19 57/21 58/6 58/9 58/10 58/15 58/16 59/2 59/4 59/10 59/15 59/16 61/25 61/25 70/7 70/12 70/20 71/5 71/6 71/10 74/7 75/5 75/7 75/9 75/11 75/14 75/14 75/16 75/17 75/17 82/7 82/17 89/4 130/25 131/12 131/15 131/16 131/18 131/22 131/25 132/1 132/12 132/14 132/18 132/23 133/1 133/5 133/8 133/11 133/14 133/19 133/23 133/23 134/7 134/16 134/22 139/18 162/2 168/10 169/7 database [1] 124/21 date [18] 2/18 12/17 23/4 49/9 75/10 79/5 79/7 79/9 80/19 81/14 82/2 82/15 111/22 153/13 154/17 158/9 159/10 163/8 dated [24] 3/6 12/9 24/20 25/2 25/7 28/15 43/6 51/12 52/19 55/13 57/16 68/22 68/24 75/24 78/23 81/18 83/3 87/7 110/11 121/22 134/11 164/21 168/2 177/2 dates [1] 93/24 Dave [4] 87/14 87/16 121/21 168/16 David [1] 124/25	declared [1] 61/4 decreased [1] 114/14 deeply [1] 149/18 defence [13] 12/7 13/21 14/4 43/21 51/15 51/19 51/23 52/6 52/8 52/11 53/9 83/17 122/3 defend [2] 170/10 175/18 defendant [5] 43/9 43/14 44/6 80/7 83/18 defendant's [1] 81/24 deficiency [1] 42/21 defined [1] 61/3 delay [2] 44/3 148/24		
D	da [3] 106/22 106/22			

D	86/1 86/7 91/16 96/16 100/10 100/21 102/20 102/22 104/11 106/9 107/17 108/15 109/17 111/19 116/10 118/11 119/5 121/15 122/6 122/13 123/7 124/2 124/19 125/24 126/1 128/4 129/1 132/25 134/1 134/6 134/20 135/3 138/19 139/20 139/22 140/25 141/2 141/15 143/13 143/18 144/14 150/20 151/4 152/8 153/19 154/7 154/25 156/2 156/4 156/24 157/14 161/3 161/5 161/14 163/3 165/24 166/8 168/19 169/4 169/19 170/2 170/13 171/17 173/2 173/10 173/17 173/19 174/18 177/10 179/2 179/10	doesn't [1] 58/10 doing [12] 7/2 21/25 35/2 36/14 103/20 108/1 115/24 117/17 121/6 125/9 173/9 176/19 don't [129] 9/10 9/10 12/15 14/8 14/12 15/13 15/24 15/24 16/6 16/16 19/2 19/24 20/1 20/13 23/14 23/25 24/5 24/6 27/20 28/1 28/9 29/7 29/21 31/7 31/7 31/18 33/17 34/4 34/18 35/1 35/1 35/3 35/3 35/6 35/9 35/13 35/15 35/17 35/23 36/7 36/9 44/19 44/22 44/24 45/6 45/6 45/7 45/10 45/21 47/18 47/24 48/1 48/3 48/9 48/18 51/6 54/8 54/13 56/8 57/6 57/6 58/3 58/5 58/20 58/20 59/8 59/10 64/13 64/20 68/5 70/14 73/15 82/20 82/25 84/8 90/11 90/11 91/22 92/5 95/17 96/5 96/18 96/19 96/20 99/20 102/24 102/24 103/8 103/8 103/12 104/2 104/15 104/23 105/4 106/10 107/21 108/3 108/3 108/17 108/25 109/2 115/15 119/21 120/1 121/17 123/5 125/23 126/2 126/4 127/17 139/10 139/22 140/12 140/15 150/15 151/7 152/10 156/3 161/4 163/12 165/4 167/1 171/12 173/16 174/19 175/7 176/15 177/24 179/9	122/13 123/3 123/10 124/18 135/6 137/5 138/18 141/9 144/21 150/4 154/14 156/14 157/17 159/21 166/22 167/16 168/3 172/7 175/3 178/3 179/1 download [1] 75/8 downloaded [1] 131/22 draft [2] 62/10 123/15 drafted [2] 79/4 138/22 drafting [1] 138/6 drawn [2] 138/3 138/3 driven [1] 25/24 dropped [1] 108/12 dual [1] 6/8 due [12] 1/11 30/5 57/12 60/25 80/20 81/6 113/18 128/13 129/21 151/3 155/22 168/11 Dulton [2] 43/16 43/18 duplication [2] 69/1 70/17 DUPOF [5] 158/11 158/16 159/3 159/4 165/19 during [31] 6/21 9/16 9/23 10/24 11/22 14/20 14/21 16/10 17/7 22/4 38/5 52/7 72/4 79/16 87/10 97/1 107/14 111/20 122/15 129/7 136/16 136/19 136/24 145/22 149/5 151/16 151/24 152/25 153/6 153/8 153/20 duties [1] 15/23 duty [2] 10/23 68/9	effective [1] 136/9 effectively [2] 97/5 171/7 eg [1] 57/22 eg timing [1] 57/22 eight [1] 114/15 either [7] 22/18 23/23 53/10 63/6 104/23 113/17 161/6 elicit [1] 20/18 else [7] 22/19 45/12 64/10 91/20 109/8 138/14 173/11 else's [2] 68/13 156/13 email [63] 24/13 24/19 24/21 28/13 28/16 29/6 51/10 51/13 52/10 52/15 52/18 52/21 53/13 54/4 54/10 54/12 54/16 55/12 55/13 55/15 55/20 56/2 56/4 56/7 56/21 57/14 57/18 58/3 58/4 59/15 61/21 61/24 62/6 62/18 63/22 64/3 68/1 68/21 68/23 69/5 69/10 70/5 71/14 83/2 83/5 83/13 87/5 87/14 121/21 123/13 123/18 123/20 123/23 124/11 125/18 134/10 134/13 134/24 137/9 138/4 173/4 176/23 178/1 emails [7] 10/14 61/22 62/4 68/25 124/25 172/9 172/24 emerged [1] 114/1 Emma [1] 2/23 employed [6] 4/1 107/10 111/8 147/13 148/11 148/13 employee [3] 38/7 56/19 104/24 employees [4] 18/13 18/23 19/1 23/10 employer [1] 148/13 enable [2] 19/9 123/23 enabled [1] 118/21 end [13] 8/13 8/22 34/11 87/4 105/21 112/20 122/25 123/3 141/24 142/13 142/17 142/22 142/23 ended [2] 5/14 102/11 Enforcement [2] 24/15 24/17 engineers [2] 39/14 39/15 enhanced [2] 34/5 34/14
	document [70] 12/4 12/8 12/9 12/13 12/22 13/18 14/9 23/1 23/4 24/12 25/12 26/1 26/18 26/24 26/25 27/19 28/12 28/24 38/9 40/12 41/16 42/12 42/22 46/2 48/25 49/5 49/8 49/12 50/17 51/9 52/17 55/10 57/13 59/11 61/20 68/20 69/2 84/13 86/20 87/3 87/22 90/12 101/8 101/9 102/2 116/24 117/20 118/14 122/13 123/16 125/20 125/20 125/23 125/25 126/3 126/11 126/21 127/16 137/12 137/17 138/18 144/6 144/10 144/20 154/14 172/2 174/15 174/18 174/21 175/3	donations [1] 148/9 done [18] 14/23 24/6 24/9 46/20 53/11 68/5 68/6 82/24 97/4 97/4 100/22 116/11 125/13 128/9 145/11 145/19 154/11 165/25 doubt [5] 66/18 80/18 81/13 82/15 178/8 down [53] 13/21 14/13 19/13 20/21 23/8 24/16 24/22 39/1 40/13 40/21 41/13 42/24 42/25 44/10 46/17 56/1 59/19 60/2 60/8 60/14 69/6 71/22 78/1 84/20 85/6 94/2 97/19 102/11 105/19 117/20 119/14 121/24	E each [7] 17/19 53/22 56/9 88/25 114/8 148/2 149/22 earlier [11] 71/15 83/6 85/5 91/19 146/10 163/21 165/18 171/24 172/5 172/14 176/8 early [4] 19/8 36/15 168/20 171/15 earrings [1] 105/24 ease [1] 108/5 easier [2] 75/11 121/9 education [2] 88/15 90/5 effect [5] 26/7 26/17 27/11 73/5 73/20	documentation [3] 15/10 31/12 81/23 documents [29] 1/14 1/21 1/22 2/3 2/5 2/8 15/18 25/7 73/23 80/3 122/24 123/5 124/3 124/20 125/17 126/7 127/10 127/13 131/6 136/7 138/9 152/23 154/6 154/10 157/23 160/15 161/18 175/4 176/6 does [11] 58/11 79/11 85/12 119/21 126/2 158/13 165/21 165/23 166/13 171/22 175/6

E	28/3 34/5 34/22 35/2 35/4 35/7 35/20 37/19 45/11 51/6 67/21 126/3 132/2 134/6 163/18 164/6 166/8 171/12 173/18 175/7 every [7] 11/3 130/20 131/22 135/13 170/24 171/2 178/15 everybody [3] 25/25 104/14 125/8 everyday [1] 173/8 everyone [1] 1/25 everything [11] 17/6 56/14 57/11 58/23 62/16 93/19 125/9 128/18 133/3 145/8 173/11 evidence [45] 1/7 1/11 1/13 1/16 1/22 2/5 2/10 2/16 2/17 7/22 7/24 10/25 31/16 31/18 32/4 32/18 57/20 79/1 79/14 79/18 80/23 81/5 81/7 81/10 96/1 97/12 97/13 102/18 104/6 104/6 104/10 107/17 109/15 119/17 131/13 132/20 134/15 142/9 142/10 142/11 143/10 151/23 178/16 179/18 181/2 evidence/information [1] 10/25 exact [2] 11/22 128/23 exactly [14] 9/17 10/4 23/3 33/14 53/9 56/21 58/15 67/1 67/19 107/18 111/22 114/10 115/8 174/25 examining [2] 14/19 177/8 example [8] 30/6 61/15 74/19 134/17 134/23 137/2 169/22 174/6 examples [3] 20/3 20/5 59/7 Excel [1] 171/7 exceptionally [1] 170/19 excess [2] 30/10 76/3 excessive [1] 130/5 excuse [2] 86/25 169/13 exercises [1] 87/9 exert [1] 107/13 exhibit [2] 77/5 80/22 exhibit bundles [1] 80/22 exhibiting [1] 146/23	Exhibits [2] 26/12 26/23 expect [2] 18/5 81/6 expected [4] 42/10 86/22 87/11 133/22 expecting [1] 41/25 expense [1] 44/3 experience [12] 7/14 22/16 39/2 104/9 116/9 116/14 117/24 128/13 147/4 147/6 147/8 151/18 experiencing [2] 95/10 163/14 expert [7] 81/7 175/18 175/19 176/3 176/13 176/14 176/18 expertise [1] 132/25 explain [32] 24/10 61/25 72/14 76/11 79/7 79/23 85/17 93/4 114/13 115/14 116/5 117/11 119/14 123/22 126/14 128/14 128/16 129/5 129/9 129/19 130/10 132/7 135/7 135/25 139/11 144/23 145/1 149/16 150/5 152/1 152/11 175/10 explained [4] 60/9 80/1 148/16 176/20 explaining [1] 72/16 explains [3] 13/18 60/3 170/17 explanation [7] 41/11 51/7 64/24 77/25 79/10 106/11 163/1 explicit [1] 139/21 explicitly [1] 139/22 explore [2] 64/10 90/21 exploring [1] 65/14 express [1] 78/14 expressing [1] 70/6 external [2] 29/3 177/15 externally [1] 177/7 extract [1] 147/22 extremely [2] 1/18 82/8 eyes' [1] 105/25	facts [8] 41/21 43/17 129/12 131/24 142/4 142/25 143/14 179/7 failed [3] 65/15 66/2 100/11 failings [7] 28/17 28/21 28/23 29/1 29/9 29/19 168/7 failure [2] 29/15 90/21 fair [5] 42/12 54/15 89/16 89/20 111/11 fairly [4] 104/15 126/8 151/20 151/22 fairness [1] 2/7 false [13] 22/5 42/5 43/10 61/11 78/13 79/12 83/8 83/19 84/1 84/23 108/11 142/11 148/3 falsified [1] 148/7 familiar [2] 125/23 126/10 familiarise [3] 26/15 125/18 126/7 family [1] 96/17 far [8] 18/22 23/15 108/17 127/24 128/1 133/10 139/19 163/7 fashion [1] 125/9 fault [2] 83/10 141/6 favour [1] 78/15 favourable [1] 44/6 fax [2] 39/8 39/16 Fazakerley [5] 147/13 148/12 148/25 151/10 154/9 Feasibly [1] 169/25 featured [1] 88/17 February [10] 41/19 43/11 43/13 55/13 78/4 80/17 81/3 81/22 102/20 159/11 Federation [3] 18/8 72/3 72/17 Feedback [1] 118/16 feel [4] 28/3 78/12 86/2 117/14 feelings [1] 107/19 feels [2] 107/20 109/5 fell [1] 106/3 felt [7] 27/22 107/20 108/21 109/1 109/3 145/10 168/11 female [1] 106/23 few [8] 62/21 89/13 90/22 95/2 99/11 121/19 157/24 159/7 field [2] 111/17 117/14 figure [3] 51/22 77/17 79/24 figures [5] 61/3 61/6	77/18 97/15 128/24 file [13] 37/4 84/14 88/16 89/3 135/12 137/13 139/15 141/15 141/16 141/18 170/22 170/25 172/4 files [5] 125/8 171/4 171/6 171/11 173/11 fill [3] 79/7 106/14 115/22 filled [1] 156/20 filling [1] 83/18 filtered [1] 167/16 final [7] 22/9 26/12 26/23 37/8 37/23 100/8 123/7 finalised [1] 8/23 finally [2] 159/8 166/4 Finance [2] 30/21 62/2 financial [3] 23/21 143/24 168/4 find [12] 34/2 34/14 38/22 49/20 103/11 127/7 129/11 132/20 152/23 154/4 155/19 163/1 finding [3] 22/13 22/15 161/21 findings [2] 97/25 177/18 fine [8] 47/17 56/14 67/3 94/5 98/25 109/21 165/10 167/4 fingerprints [1] 106/21 finish [1] 120/10 finished [1] 152/18 first [29] 4/23 7/12 30/18 33/12 42/5 43/3 65/21 75/23 78/25 81/25 82/13 83/6 86/20 87/19 104/19 111/3 120/18 120/21 123/5 145/2 145/13 145/23 146/1 150/6 154/8 156/4 156/5 157/13 177/2 Firstly [1] 69/13 five [2] 22/2 115/8 fixed [1] 61/4 flagging [1] 81/9 flags [1] 99/11 flaws [1] 177/20 floor [4] 103/20 104/19 105/6 106/4 flounder [1] 88/20 focus [1] 118/22 focused [3] 6/2 50/3 64/18 focusing [1] 110/23 follow [4] 18/9 100/6 146/4 146/21
----------	---	--	---	---

F	Friday [3] 179/25 180/2 180/5 front [3] 3/5 34/11 110/10 FSC [1] 30/21 Fujitsu [35] 32/24 33/4 33/7 33/21 34/1 34/20 34/23 35/12 35/22 57/17 57/21 58/6 58/10 59/4 59/16 61/25 64/9 70/4 70/12 75/9 81/8 82/17 133/10 133/18 133/22 134/3 134/12 134/16 134/21 166/11 167/8 167/10 167/12 167/15 167/20 full [14] 3/1 38/21 51/6 76/19 77/5 78/5 78/6 80/18 110/7 121/6 129/13 147/21 154/5 168/13 fully [7] 8/2 10/24 50/22 63/21 63/25 100/18 117/9 function [1] 100/5 functional [1] 41/15 functioning [1] 40/9 fund [2] 165/22 165/23 fundamentally [1] 51/4 funds [2] 43/19 149/13 further [29] 14/13 19/11 30/13 33/7 35/21 44/4 44/10 50/18 51/25 55/10 55/20 59/4 69/16 79/18 80/10 82/17 109/6 131/13 135/3 137/6 140/2 141/14 145/17 147/9 162/1 164/25 172/1 172/7 179/9 future [3] 9/17 45/24 176/17	Gentlemen [1] 55/19 get [24] 19/9 19/16 20/19 20/21 39/17 57/22 60/21 63/14 65/2 74/11 89/7 91/21 93/19 94/21 95/7 106/19 117/17 127/5 132/18 134/17 142/18 157/1 157/23 173/1 getting [4] 19/22 39/22 87/25 159/6 Gilchrist [3] 113/22 114/23 166/25 giro [2] 148/7 149/5 Girobank [6] 152/12 160/18 161/1 161/21 162/20 162/22 giros [2] 91/21 92/25 give [16] 1/11 1/13 1/22 2/10 17/3 20/17 37/8 37/22 73/2 101/25 102/18 106/10 109/15 112/6 177/4 179/18 given [23] 2/17 9/8 9/19 16/13 21/3 32/22 45/11 47/19 50/11 51/6 59/7 67/21 80/20 82/15 96/1 97/25 104/21 126/6 133/23 138/2 139/4 168/8 174/15 gives [1] 75/7 giving [3] 2/16 10/8 85/19 Glad [1] 117/7 glitch [3] 44/15 44/24 51/6 glitches [1] 51/7 GLO [3] 38/6 65/23 66/5 go [59] 33/7 38/25 40/11 40/25 46/16 49/4 49/6 49/15 55/9 55/15 62/12 62/15 62/24 63/5 66/13 71/12 72/20 75/20 91/24 93/13 101/7 101/8 102/5 104/18 105/7 105/11 105/13 106/20 107/1 109/17 116/4 123/3 123/17 126/14 126/23 129/13 130/25 133/18 133/23 136/8 136/12 144/6 144/10 144/22 147/20 153/11 153/16 157/9 158/7 159/23 160/4 160/5 161/17 161/19 162/12 168/3 171/18 172/3 178/3 goes [5] 79/23 89/2 90/2 136/21 162/14 going [46] 11/14	17/24 22/1 24/19 28/8 43/3 49/16 57/8 60/7 60/14 65/2 65/16 71/7 75/23 79/19 83/2 87/1 91/14 91/22 93/2 93/6 94/10 94/12 94/22 95/22 98/19 99/3 102/18 104/18 105/6 108/8 110/22 112/21 113/18 119/24 129/20 130/2 132/22 133/5 140/8 151/8 158/17 163/23 164/12 173/6 178/20 gone [7] 58/23 62/22 79/15 133/11 133/15 159/17 160/1 good [11] 1/3 2/8 2/23 39/21 40/5 60/25 64/24 99/23 110/1 155/14 156/1 Google [1] 127/7 got [19] 8/21 8/22 8/23 37/3 40/22 47/13 48/7 54/14 56/2 64/12 93/20 94/19 106/2 120/18 128/19 138/5 162/16 170/15 174/19 governance [3] 137/14 170/22 172/4 governing [2] 13/8 18/25 governs [1] 12/6 Graham [4] 41/19 43/5 57/15 134/10 Graham Ward [2] 43/5 134/10 GRANVILLE [3] 2/21 3/2 181/4 grateful [2] 80/24 109/16 great [4] 2/11 48/18 115/18 146/18 greatly [1] 61/6 grew [1] 17/4 grips [1] 87/25 Grocer [1] 55/25 ground [2] 103/20 162/12 Group [4] 26/6 27/10 27/25 177/8 growing [1] 56/10 guess [9] 15/14 19/25 33/9 50/1 58/11 67/17 73/15 83/24 86/4 guessing [2] 24/6 29/17 guidance [6] 11/24 27/2 32/22 122/20 122/23 124/19 Guidelines [3] 13/25 14/2 14/7 guides [1] 88/22	guilt [2] 11/11 66/10 guilty [14] 23/10 23/18 24/3 24/9 35/7 43/10 74/18 74/22 77/4 80/14 84/1 108/13 148/3 178/11
		H	had [131] 8/20 8/24 10/23 11/10 17/6 18/5 18/13 22/6 23/17 24/8 25/12 30/2 30/4 30/7 30/8 30/23 31/23 31/24 34/7 34/16 36/1 36/7 37/2 38/18 39/6 39/8 39/13 39/14 39/16 42/18 43/21 43/24 44/13 45/9 46/7 46/14 46/15 49/11 52/3 54/6 54/9 54/9 54/16 54/18 57/3 60/11 61/11 61/13 64/25 65/10 66/1 66/2 66/2 66/4 67/12 69/11 69/25 70/17 74/1 74/15 77/17 85/8 85/16 85/19 86/16 87/25 88/8 94/25 95/4 97/4 97/8 98/9 98/12 98/20 105/5 105/5 105/9 105/17 106/5 111/11 113/3 114/8 115/6 120/19 122/16 124/22 125/12 125/13 125/15 131/14 132/10 132/25 133/4 134/23 136/18 139/5 139/17 140/7 141/14 145/21 146/9 146/19 148/7 149/13 149/17 149/18 150/23 151/1 152/18 153/24 153/25 154/11 157/20 160/11 162/1 163/16 166/1 166/24 167/10 167/15 168/7 168/9 169/6 169/8 169/10 169/20 171/7 172/20 174/22 175/19 176/10 hadn't [6] 52/5 59/4 95/11 97/4 98/21 117/23 half [5] 78/6 148/17 148/18 156/8 156/9 halfway [3] 38/25 59/19 85/6 Hall [17] 46/5 46/22 47/3 47/8 47/23 48/12 48/14 49/17 50/24 86/1 86/17 90/10 90/20 91/15 92/15 95/3 109/12 Hall's [11] 49/3 49/21 62/4 63/9 64/6 64/10	

H	141/15 148/14 148/16 148/18 151/20 151/21 161/10 167/16 167/18 168/8 168/11 168/24 169/19 170/24 171/2 173/12 173/14 176/2 176/5 176/6 he's [5] 82/24 150/21 150/23 169/20 177/1 Head [2] 75/22 177/1 heading [1] 59/19 health [1] 149/18 hear [7] 1/3 55/6 110/2 128/24 162/9 162/11 165/15 heard [6] 43/15 63/7 63/18 64/4 100/17 106/5 hearing [5] 43/17 43/25 102/17 178/7 180/4 hearings [1] 147/2 held [10] 4/3 4/14 4/17 7/4 33/21 34/1 58/10 111/16 111/20 111/21 Helen [3] 114/24 166/25 168/1 Hello [1] 55/6 help [18] 25/4 25/17 52/24 72/10 88/22 91/19 95/4 95/7 129/23 159/2 162/13 166/19 170/23 172/16 173/5 174/4 176/25 177/16 helped [1] 166/2 helpful [2] 79/13 81/1 helping [1] 165/24 helpline [4] 36/11 64/14 93/18 112/9 helps [1] 72/9 hence [1] 162/19 Henderson [11] 52/3 71/14 71/21 74/4 74/18 77/10 77/24 78/2 84/2 86/1 86/17 Henderson's [5] 51/13 72/1 73/16 74/16 79/10 her [24] 48/16 49/4 52/4 61/6 61/13 73/19 74/19 84/3 101/4 102/21 104/6 104/9 105/17 107/7 107/19 107/24 107/24 107/25 107/25 108/15 108/16 108/22 148/1 151/5 here [25] 10/12 11/15 12/1 16/21 17/25 19/7 26/2 30/15 33/12 37/1 40/9 41/10 47/14 47/23 63/17 64/8 75/3 77/9 78/11 83/7 84/20	85/15 104/18 107/18 109/17 hers [1] 68/25 Hi [1] 62/20 hide [1] 94/20 high [1] 132/3 high-value [1] 132/3 higher [1] 67/19 highlight [2] 89/10 147/22 highlighted [2] 90/3 178/5 Hightown [4] 88/18 88/19 89/23 90/6 him [12] 62/7 95/23 96/4 150/11 150/14 151/18 151/21 164/17 164/19 167/15 168/24 171/3 hindsight [7] 44/25 58/23 65/12 71/8 100/9 100/24 179/2 his [22] 1/13 1/16 2/16 2/16 43/15 43/17 44/2 44/8 57/18 96/25 97/5 97/6 97/6 97/10 98/13 125/18 136/15 147/2 148/1 169/5 169/20 174/7 historically [1] 162/21 hm [6] 12/3 42/2 46/9 53/23 101/5 142/2 holding [2] 89/10 130/4 holdings [2] 88/13 89/9 holiday [3] 94/8 149/12 155/15 Holmes [17] 38/11 39/4 39/12 40/7 40/17 41/7 41/10 95/22 96/3 96/22 97/8 97/23 98/6 98/6 98/9 98/12 100/9 Holmes' [5] 50/6 96/10 96/17 97/11 100/12 home [4] 96/17 124/9 124/10 124/12 homes [1] 153/4 honest [5] 20/2 29/7 133/2 143/12 146/18 honestly [3] 58/3 158/21 163/12 Honour [5] 43/15 43/17 44/2 44/8 148/1 hope [6] 1/21 62/24 63/5 78/12 78/14 109/12 Hopefully [1] 25/19 hoping [2] 47/5 97/2 HORice [1] 131/16 Horizon [130] 9/20 15/25 16/4 16/5 16/8	16/13 16/15 31/8 32/1 32/7 32/23 34/20 36/10 38/8 39/2 39/14 40/21 42/16 42/20 45/2 45/13 45/19 47/12 47/22 47/24 48/2 48/12 48/15 48/20 49/22 50/6 51/20 52/5 52/13 53/1 53/24 54/5 54/18 55/14 55/17 56/3 56/5 56/6 56/20 56/23 57/3 61/18 63/7 63/11 63/18 64/1 64/11 64/21 65/7 65/14 65/23 65/25 66/2 66/4 66/16 66/17 66/20 67/23 68/16 71/2 71/6 71/10 74/7 76/19 77/13 81/5 81/10 81/23 82/5 82/7 83/9 84/4 84/24 85/1 85/24 88/11 88/13 90/20 95/14 96/23 97/1 97/13 97/15 98/10 111/19 111/23 112/1 112/16 131/4 132/4 132/11 132/15 133/7 136/19 136/25 137/2 137/7 139/9 139/14 140/4 140/6 140/13 140/16 141/6 148/7 155/1 157/16 166/6 166/9 166/11 166/21 167/4 167/8 167/13 167/17 168/9 169/6 169/23 170/10 172/10 173/25 174/23 175/8 175/18 177/23 horrendous [1] 105/17 house [2] 5/17 6/3 how [36] 5/9 9/20 17/15 20/1 23/14 39/2 39/3 41/8 57/6 57/7 60/18 62/14 68/5 70/14 72/16 73/7 76/21 76/22 76/23 76/25 78/18 82/23 84/8 104/16 107/4 107/19 107/22 108/21 108/23 109/1 119/25 120/15 121/4 127/8 131/17 163/7 however [7] 1/25 44/1 44/24 46/21 70/16 138/2 178/17 HR [1] 115/19 huge [1] 82/7 Human [2] 13/24 102/19 humiliate [1] 107/25 husband [1] 102/9 Hutchinson [2]	114/23 117/2 I I accompanied [1] 151/12 I act [1] 86/14 I actually [1] 93/20 I also [2] 11/23 76/6 I am [9] 18/4 47/10 76/15 79/5 81/4 87/1 111/10 133/13 155/13 I apologise [3] 8/3 28/11 99/23 I applied [1] 113/8 I appreciate [3] 99/2 99/16 100/16 I asked [2] 64/12 94/16 I assume [3] 20/5 159/5 159/16 I attended [4] 9/17 155/19 156/18 160/11 I be [1] 54/15 I believe [20] 7/19 8/7 8/15 13/13 17/3 20/13 25/21 38/20 44/16 52/6 52/8 64/12 73/7 74/23 74/24 77/10 84/18 95/15 106/11 140/5 I believed [1] 98/24 I came [1] 94/7 I can [20] 11/6 11/21 22/16 24/10 25/19 72/1 91/5 91/13 93/15 94/21 99/24 110/3 115/18 128/8 142/18 146/14 158/16 161/19 175/1 175/9 I can't [30] 8/2 20/2 20/4 34/4 36/15 41/9 49/20 67/1 67/10 67/19 82/20 91/19 93/24 96/5 104/23 105/12 107/19 114/10 119/7 119/7 122/17 126/12 128/23 143/12 152/7 152/16 158/6 169/11 169/20 174/25 I cannot [3] 9/16 10/3 140/8 I caused [1] 1/10 I certainly [3] 22/16 135/20 175/14 I concluded [1] 54/15 I could [11] 17/13 35/17 101/6 102/14 106/10 124/11 124/12 124/23 132/20 161/18 162/13 I couldn't [2] 21/22 106/4 I covered [2] 41/5 120/11
----------	--	---	--	---

<p>I I dealt [1] 66/14 I decided [1] 113/5 I did [8] 12/15 48/10 111/18 111/23 126/13 128/23 133/2 147/3 I didn't [13] 50/1 68/7 91/19 94/2 103/22 116/9 116/13 127/7 128/7 128/8 154/10 163/25 164/19 I do [7] 3/8 4/2 31/11 38/6 65/22 126/1 166/8 I don't [117] 9/10 9/10 12/15 14/8 14/12 15/13 15/24 15/24 16/6 16/16 19/2 19/24 20/1 20/13 23/14 23/25 24/5 24/6 27/20 28/1 29/7 29/21 31/7 31/7 31/18 33/17 34/4 34/18 35/1 35/1 35/3 35/3 35/6 35/9 35/13 35/15 35/17 35/23 36/7 36/9 44/19 44/22 44/24 45/6 45/6 45/7 45/10 45/21 47/18 47/24 48/1 48/3 48/9 48/18 51/6 54/8 54/13 56/8 57/6 57/6 58/3 58/5 58/20 58/20 59/8 59/10 64/13 68/5 70/14 73/15 82/20 82/25 84/8 90/11 90/11 91/22 92/5 96/5 96/18 96/20 99/20 102/24 102/24 103/8 103/8 103/12 104/2 104/15 104/23 105/4 106/10 107/21 108/3 108/3 108/17 108/25 109/2 120/1 121/17 125/23 126/4 127/17 139/22 140/15 150/15 152/10 156/3 161/4 163/12 165/4 167/1 171/12 173/16 174/19 176/15 177/24 179/9 I ended [2] 5/14 102/11 I enjoy [1] 117/8 I enjoyed [1] 113/4 I expect [1] 81/6 I forget [1] 20/11 I found [1] 122/12 I got [3] 8/22 64/12 120/18 I guess [8] 15/14 19/25 33/9 50/1 58/11 67/17 73/15 86/4 I had [8] 25/12 64/25 65/10 106/5 162/1</p>	<p>163/16 167/10 169/8 I hadn't [1] 98/21 I have [25] 2/7 38/20 40/18 46/23 52/25 53/4 53/11 63/7 63/18 69/23 70/3 77/15 79/4 85/8 86/6 97/25 107/9 108/8 158/15 159/3 160/15 160/18 160/20 161/8 177/17 I haven't [2] 40/22 109/6 I held [1] 111/21 I honestly [1] 158/21 I hope [4] 62/24 63/5 78/12 109/12 I interviewed [2] 59/22 101/15 I joined [2] 11/24 36/15 I just [14] 25/11 32/25 41/1 47/11 94/20 95/2 111/15 117/14 117/17 142/14 147/22 166/4 173/16 177/4 I knew [3] 15/13 41/4 56/9 I know [6] 65/1 91/20 117/17 161/9 176/5 176/15 I may [1] 126/11 I mean [8] 22/23 40/21 126/11 131/21 135/1 161/8 161/17 164/11 I might [1] 52/8 I moved [2] 4/25 8/17 I must [3] 64/4 159/6 161/9 I nearly [1] 106/3 I need [1] 1/8 I never [1] 37/24 I note [1] 76/12 I only [2] 90/22 132/2 I owned [1] 88/3 I presume [2] 50/20 82/18 I probably [1] 35/16 I put [1] 70/13 I raised [1] 168/25 I read [2] 29/11 29/11 I recall [6] 16/24 88/3 127/24 144/19 145/18 164/8 I received [1] 29/25 I recognised [1] 12/17 I remember [3] 8/2 128/1 139/19 I represent [1] 95/23 I requested [1] 94/18 I responded [1] 106/1</p>	<p>I said [8] 45/15 47/18 51/2 84/23 99/18 105/24 106/10 163/21 I saw [2] 98/25 158/14 I say [5] 21/21 65/16 67/4 146/18 171/13 I see [1] 105/24 I seem [1] 116/21 I sent [1] 68/1 I should [4] 57/10 91/18 102/2 102/6 I sort [2] 44/22 57/8 I spent [1] 40/23 I spoke [2] 93/25 94/16 I started [3] 8/15 120/6 140/10 I suppose [2] 40/1 178/24 I suspect [1] 82/4 I think [85] 5/1 5/12 5/21 5/21 6/10 6/23 8/4 9/5 9/7 10/16 13/13 20/9 20/14 21/20 21/21 21/22 25/7 30/21 33/18 33/18 35/15 35/16 35/18 36/13 36/18 36/19 36/21 44/16 44/17 44/18 44/23 45/15 47/4 47/25 52/7 56/13 58/24 64/4 64/24 66/6 66/24 67/10 67/10 67/11 67/16 68/1 68/2 70/14 71/11 78/17 78/18 85/16 91/16 92/12 101/13 106/19 106/21 109/9 114/10 115/19 117/5 120/18 120/22 123/22 125/7 128/18 128/20 132/2 138/21 139/1 151/17 152/16 152/19 152/22 154/12 155/4 155/5 155/5 156/25 158/14 166/25 169/14 175/13 179/14 179/23 I thought [1] 113/7 I told [1] 102/13 I took [1] 48/18 I tried [1] 63/14 I turn [2] 86/8 179/10 I understand [4] 34/12 47/17 54/12 76/2 I understood [3] 70/15 73/7 139/16 I used [1] 157/1 I want [5] 1/17 36/20 86/19 87/18 101/2 I wanted [3] 89/12 94/19 113/2</p>	<p>I was [47] 4/22 5/21 8/15 10/5 15/15 19/24 23/15 28/8 34/18 35/15 35/18 44/16 44/16 44/17 45/6 45/7 47/24 47/25 48/9 50/3 54/8 64/18 65/10 66/6 75/4 86/4 88/5 94/3 98/14 98/14 98/16 98/19 100/15 100/15 102/16 113/16 115/20 116/12 126/10 146/20 162/12 163/22 163/23 170/25 171/14 171/15 173/16 I wasn't [4] 45/2 98/15 98/25 135/2 I will [6] 2/24 47/9 47/10 53/13 69/20 110/20 I wish [2] 94/1 179/6 I won't [1] 147/21 I wonder [1] 165/3 I worked [1] 112/10 I would [50] 11/4 11/19 12/20 15/16 18/5 20/3 21/25 22/15 30/1 30/10 36/14 45/15 45/25 48/9 50/25 54/7 54/20 65/10 65/17 68/5 76/25 80/23 83/24 85/17 87/23 88/23 89/6 100/17 103/8 107/5 107/21 119/23 120/6 124/21 127/7 127/8 130/22 140/5 140/9 156/9 159/5 159/25 161/11 162/11 164/19 168/21 168/22 177/23 178/22 178/25 I wouldn't [11] 15/16 42/17 46/24 51/3 68/6 85/19 85/21 109/2 126/12 133/21 162/23 I'd [24] 15/17 34/21 47/14 55/9 65/18 71/12 84/11 91/1 91/3 94/1 103/19 111/3 113/3 116/12 120/9 126/9 127/18 133/4 135/1 147/4 161/24 163/22 164/18 165/18 I'll [6] 87/7 87/21 91/25 100/20 101/2 101/25 I'm [52] 20/2 23/3 24/6 27/20 29/7 29/17 35/13 35/14 35/14 40/5 47/5 57/7 57/7 58/20 62/21 71/7 72/13 72/14 72/16 85/15 85/16 91/14 92/13 95/22 96/18</p>	<p>100/14 100/14 100/18 102/24 103/9 104/17 104/18 106/12 106/13 108/8 109/4 109/16 110/22 111/21 111/22 115/8 116/22 125/25 133/2 133/17 152/17 156/25 161/20 163/6 174/19 177/24 179/20 I'm having [1] 72/13 I've [24] 8/4 31/20 37/13 46/15 47/13 54/14 62/22 68/5 78/19 85/16 87/22 90/11 91/17 93/17 94/19 105/8 115/19 117/13 123/8 134/23 138/5 161/12 161/21 174/19 Iain [1] 55/16 ID [2] 75/13 127/8 idea [5] 40/18 40/19 40/20 159/3 177/17 identification [7] 125/19 126/15 127/1 127/3 127/12 127/15 127/20 identified [4] 21/15 29/10 69/23 148/16 identify [3] 29/2 82/9 162/21 identifying [2] 19/4 106/17 identity [1] 126/9 ie [1] 9/20 ie how [1] 9/20 if [160] 3/9 15/15 18/4 18/5 18/13 19/18 19/24 20/2 20/19 21/1 21/5 21/7 22/6 24/7 24/15 24/22 28/9 28/10 29/7 29/11 29/14 30/13 31/20 32/9 32/9 32/16 33/7 33/19 34/9 34/18 35/15 36/1 36/7 36/8 37/5 42/24 45/3 45/6 47/13 48/10 48/22 49/4 49/6 49/15 53/18 54/8 54/8 54/15 54/16 54/22 54/25 55/15 57/6 57/20 59/8 61/12 64/12 70/18 72/9 72/11 72/14 72/17 72/25 73/6 73/12 75/20 78/2 79/13 80/24 82/2 82/8 83/8 84/19 84/22 85/3 86/23 87/3 87/13 87/18 87/20 89/6 91/5 93/13 93/13 96/5 96/7 99/4 99/22 101/1 101/6 101/7 101/7 102/5 103/10 103/10</p>
--	--	---	--	--

I	in	instructed [2] 19/12 146/10 149/22	investigations [31] 4/16 6/1 7/9 7/14 8/6 8/19 12/12 13/2 13/5 13/7 13/9 13/11 13/22 16/23 22/12 22/21 25/4 25/16 37/22 116/7 117/24 118/16 120/16 120/25 121/7 122/22 128/19 128/21 136/6 170/8 179/4
if... [65] 104/18 105/5 105/13 106/19 107/20 108/4 108/8 108/21 109/1 109/3 109/18 109/19 110/11 117/3 121/24 123/3 123/17 124/23 126/23 127/6 127/12 129/6 130/22 132/19 133/2 133/18 134/15 136/7 136/12 137/5 137/17 139/13 140/9 140/15 140/23 141/5 144/5 144/17 145/10 145/21 147/20 152/8 153/11 153/16 154/14 157/13 158/7 159/19 160/5 160/19 160/23 161/18 161/23 162/13 162/20 163/18 164/1 164/18 165/3 165/5 168/3 169/12 169/15 174/6 178/3	incurred [1] 27/17	integrity [18] 48/15 53/1 53/25 54/6 54/18 56/6 65/7 66/15 67/23 70/12 71/2 71/6 71/10 90/20 97/14 140/6 174/1 174/23	investigative [1] 10/6
illness [1] 148/15	indeed [1] 52/10	Intelligence [2] 4/6 7/5	investigator [58] 4/5 5/20 6/12 7/1 7/2 7/12 7/13 11/9 11/17 12/1 12/19 13/10 13/16 14/6 14/24 15/2 15/4 15/8 15/9 15/18 15/22 16/14 17/3 17/8 19/8 19/23 21/3 23/9 23/23 24/2 28/3 33/20 34/21 37/2 37/15 60/1 68/9 71/23 75/5 82/21 85/11 86/4 99/11 101/19 105/22 106/7 108/2 110/24 120/22 131/7 131/9 139/17 141/11 142/7 143/18 145/3 145/12 155/10
imagine [5] 103/9 103/19 104/4 124/21 177/23	independent [1] 158/4	intend [1] 125/23	Investigator's [2] 50/14 143/7
immediate [1] 26/17	independently [1] 164/16	interaction [2] 64/8 175/24	Investigators [22] 5/23 10/23 14/3 14/15 17/18 19/4 23/12 23/24 25/5 25/18 26/15 27/1 27/13 27/23 32/22 58/14 107/11 127/19 139/14 143/13 143/16 143/24
immediately [2] 41/24 75/7	indicated [1] 83/18	interest [1] 178/16	Investigators' [1] 16/19
impact [3] 102/19 173/25 178/12	indication [2] 80/19 81/23	interject [1] 145/9	involve [2] 120/3 171/3
implemented [2] 20/6 60/17	indictment [1] 82/3	internal [2] 7/9 167/25	involved [16] 4/16 21/24 85/21 96/13 99/1 108/1 108/14 111/25 118/11 120/6 135/21 138/6 158/19 163/19 175/14 176/7
imply [1] 89/17	individual [2] 23/17 23/23	interpret [1] 133/1	involvement [14] 7/9 19/3 71/12 85/8 85/16 85/25 101/4 110/24 111/1 127/19 143/25 147/9 165/1 176/10
importance [3] 26/5 27/9 27/25	individuals [4] 18/14 130/14 130/20 166/20	interpreting [1] 57/7	involving [2] 6/3 90/6
important [1] 50/22	induction [1] 137/21	interrogate [1] 76/18	is [329]
imposed [1] 15/23	inform [1] 163/13	interrogation [2] 34/6 34/14	ish [1] 36/20
improvements [1] 29/2	information [30] 10/25 21/2 22/8 33/15 33/22 34/2 34/15 50/13 53/2 53/22 57/7 58/16 65/9 65/11 66/7 70/1 90/5 90/13 131/9 169/9 169/10 171/5 171/6 171/10 172/1 172/13 172/22 172/24 174/9 174/11	intervention [5] 88/15 112/3 154/12 154/17 154/19	Ishaq [2] 146/2 146/9
inaccurate [1] 70/6	informative [1] 109/13	intervention/education [1] 88/15	Ishaq's [1] 146/4
inappropriate [2] 37/19 104/8	informed [3] 166/16 167/15 170/9	interventions [1] 89/19	isn't [8] 42/1 49/23 66/9 86/21 89/25 90/14 102/2 103/1
Incidents [1] 16/8	initial [6] 8/1 8/9 37/22 51/22 79/22 129/11	interview [76] 10/10 19/16 38/11 38/15 38/23 40/7 42/4 46/4 46/11 48/7 48/16 49/15 49/17 50/24 52/7 59/17 59/20 59/25 60/4 61/16 71/21 71/22 72/8 72/9 72/11 72/24 73/5 73/16 73/25 74/16 74/17 90/18 90/23 91/1 96/22 97/1 98/13 99/8 100/13 101/4 101/18 101/20 101/22 102/13 102/15 103/3 103/5 105/18 105/21 106/12 118/24 119/9 126/18 135/25 136/16 137/24 138/23 139/12 140/4 141/10 145/5 145/6 145/9 145/14 145/19 145/22 146/4 146/12 146/17 146/21 146/21 146/24 149/23 153/12 153/14 164/25	issue [14] 18/5 18/9 18/13 29/5 44/1 58/7 63/17 67/5 70/11 71/9
include [4] 49/25 130/17 131/1 137/21	initially [4] 4/22 30/22 112/21 120/5	interview' [2] 72/4 136/20	
included [4] 28/23 48/6 88/22 89/23	initials [3] 137/23 138/1 172/15	interviewed [9] 34/24 59/22 72/5 101/15 103/9 103/11 105/15	
includes [1] 122/1	initiatives [5] 88/16 88/17 89/19 89/23 90/6		
including [7] 4/4 30/2 55/25 57/15 69/16 86/17 168/13	innocence [1] 66/11		
incorporated [1] 137/10	input [3] 18/24 37/16 79/25		
incorrect [3] 70/20 138/16 138/17	inquiry [39] 1/10 1/18 2/10 2/25 3/3 10/14 11/3 11/10 12/5 12/14 13/6 16/22 29/23 35/25 36/2 36/25 50/23 65/15 68/10 68/12 68/18 69/4 71/18 90/22 97/21 102/19 102/22 104/7 110/21 110/23 122/22 124/24 125/22 129/9 129/10 129/11 154/7 175/6 179/18		
increase [2] 23/13 128/22	Inquiry's [1] 2/13		
increases [2] 26/7 27/11	insinuation [1] 88/21		
increasing [1] 70/25	installation [1] 158/20		
increasingly [1] 61/1	instances [2] 1/23 28/22		
	instead [4] 2/15 22/14 44/14 88/8		

I	69/8 Jenkins [4] 81/7 175/23 175/24 176/16 Jesmond [2] 39/11 39/13 job [9] 6/21 6/25 7/2 24/9 112/25 117/8 117/14 119/23 120/15 John [8] 66/23 67/7 166/23 167/2 167/14 170/24 171/20 172/17 John Scott [7] 66/23 67/7 166/23 167/2 167/14 171/20 172/17 joined [10] 11/24 36/15 111/5 113/9 113/25 117/19 117/21 125/3 135/17 164/3 jointly [2] 148/4 149/10 jokes [1] 173/10 joking [1] 106/1 Jon [1] 69/20 judge [6] 43/16 43/18 44/2 44/8 44/13 148/1 judge's [1] 50/8 judgment [2] 97/24 147/17 judicial [3] 45/5 45/22 74/3 July [5] 68/22 68/24 113/12 123/14 137/15 July 2013 [1] 113/12 June [3] 84/19 87/7 87/16 just [113] 1/8 6/25 15/17 16/11 17/22 25/11 28/7 28/19 31/19 32/11 32/25 36/9 36/18 37/24 38/21 39/22 41/1 44/23 46/8 47/11 47/25 48/19 48/19 48/19 53/12 53/18 56/1 58/5 62/9 66/23 67/5 67/19 71/4 72/19 73/10 75/12 76/3 78/10 85/14 86/22 91/5 91/14 92/5 92/19 93/14 93/18 93/19 94/3 94/20 94/22 95/2 97/19 97/25 100/16 100/25 101/6 111/15 115/22 116/13 117/14 117/17 121/24 122/25 123/3 124/16 124/17 125/7 129/11 131/23 133/13 135/15 136/7 136/9 136/13 137/5 138/12 139/1 142/9 142/13 142/14 142/14 145/1 145/4 146/20 147/8 147/22 151/17 151/17 152/22 153/7	155/2 157/13 159/4 159/20 159/21 159/23 162/12 166/3 166/4 169/13 171/3 171/6 171/12 171/15 172/6 172/25 173/3 173/8 173/11 173/16 175/1 177/4 178/25 justice [1] 150/3 justified [1] 68/16	K KC [1] 86/14 Keith [3] 113/22 114/23 166/25 KEVIN [4] 110/5 110/9 168/15 181/12 Kevin Ryan [1] 168/15 key [2] 23/7 123/16 Khayyam [1] 146/1 kind [5] 4/16 122/11 151/24 171/17 173/5 King [8] 10/8 10/11 10/12 121/14 121/23 122/9 122/19 123/13 King's [1] 102/21 knew [7] 15/13 41/4 56/9 74/6 74/24 76/14 95/3 Knight [16] 1/6 2/21 2/23 3/2 3/21 54/11 55/8 59/25 86/7 86/13 89/12 91/8 95/18 101/19 109/16 181/4 Knight's [11] 9/12 16/20 17/25 19/6 29/23 33/11 36/25 38/2 65/20 71/17 75/2	121/17 125/24 127/7 127/17 140/12 150/15 150/20 154/7 156/24 161/9 163/12 167/1 169/19 173/8 173/16 176/5 176/15 176/15 177/24 178/24 knowing [1] 103/24 knowledge [4] 3/17 110/16 118/1 166/5 known [6] 75/4 89/14 90/7 90/9 159/5 164/15 knows [1] 1/25	L label [2] 57/23 134/19 ladies [2] 152/22 161/12 lady [4] 94/1 103/2 116/21 138/3 lady's [1] 94/17 laid [1] 13/21 laptop [1] 163/24 large [4] 30/9 77/17 95/23 162/16 larger [1] 114/11 largest [1] 78/8 last [14] 1/15 4/3 30/11 30/15 30/25 49/4 49/8 79/16 82/1 83/7 110/12 155/21 158/15 177/13 lasted [1] 118/4 late [3] 1/19 82/11 120/22 later [8] 2/14 19/11 77/23 116/4 127/25 132/3 137/13 153/4 latest [2] 2/12 127/8 latter [1] 17/7 latterly [5] 10/16 36/14 36/17 36/17 36/20 law [12] 24/14 24/17 43/2 45/5 45/12 49/2 50/11 50/17 75/22 78/15 78/23 118/1 lawyer [2] 43/2 177/15 lawyers [1] 118/11 lead [15] 5/20 23/9 24/2 25/22 71/22 75/5 106/6 120/18 120/22 131/7 141/11 145/2 145/11 172/15 174/2 leader [21] 17/13 21/3 21/25 113/13 113/15 113/15 113/21 114/16 114/19 115/1 115/5 117/8 117/12 128/4 128/10 129/7 141/12 141/17 169/1	170/3 170/18 leaders [10] 17/11 113/20 114/22 116/5 116/11 116/16 127/25 128/2 143/20 166/24 leading [1] 99/15 leads [3] 76/13 137/23 138/16 learn [1] 143/17 learned [1] 119/16 learning [1] 147/3 least [6] 17/17 50/5 54/5 65/13 99/11 157/15 leave [3] 60/19 113/5 154/2 led [4] 24/3 59/1 170/12 176/13 Leeds [1] 84/22 left [5] 88/20 102/9 106/23 113/16 161/10 left-handed [1] 106/23 legal [15] 11/25 14/21 14/23 17/1 22/9 37/3 37/5 59/13 60/4 64/4 69/15 141/13 141/17 141/23 142/18 legally [1] 73/6 Leslie [2] 114/22 168/16 let [1] 40/21 let's [2] 55/1 92/10 letter [8] 149/10 152/2 152/6 152/8 153/18 153/20 153/23 163/5 Letters [3] 25/3 25/16 27/1 letting [1] 41/13 level [5] 8/12 66/6 67/14 67/18 128/15 level 4 [1] 8/12 liaison [2] 173/22 174/6 lift [16] 102/16 103/5 103/23 103/25 104/1 104/2 104/4 104/8 104/16 104/19 104/20 104/22 105/3 105/5 105/5 105/7 lifts [2] 105/4 105/9 light [8] 10/25 13/24 42/8 42/11 50/25 55/8 100/12 160/20 like [30] 4/25 21/21 28/1 28/2 44/19 47/14 47/18 48/21 55/9 58/14 65/12 71/12 72/15 76/25 84/9 91/1 91/3 94/23 98/19 100/1 100/14 107/20 108/16 109/4 109/5 111/3 118/18 127/18
J	Jacobs [3] 95/19 95/20 181/10 JAMES [3] 110/5 110/9 181/12 Jane [3] 28/14 52/19 68/23 January [17] 52/20 54/3 76/10 77/11 78/3 80/16 81/22 113/10 148/6 148/6 149/5 149/21 150/8 151/10 153/9 153/14 158/10 January 2011 [2] 54/3 113/10 Jarnail [3] 42/24 43/1 74/1 Jason [2] 55/17 69/8 Jason Collins [1]					

L	long [7] 24/21 75/12 120/15 121/4 143/19 160/22 162/19	made [31] 19/13 21/5 27/5 34/5 35/5 35/11 35/16 42/4 44/12 52/3 58/2 58/24 62/21 64/6 64/19 72/21 73/6 79/21 88/24 100/3 106/9 127/22 129/13 135/14 141/21 143/22 148/9 151/3 160/23 164/7 175/11	16/25 17/9 66/25 67/12 112/10 114/9 114/15 115/6 115/10 115/16 116/7 116/17 118/8 125/14 126/15 136/1 137/20 143/19 172/8 172/18 173/2 173/22	159/4 159/15 159/22 166/10 169/13 171/17
like... [2] 162/25 173/2	longer [4] 11/7 11/22 62/21 115/21	mail [20] 5/3 24/18 25/3 25/15 25/20 25/22 26/6 26/13 27/1 27/10 27/25 43/20 44/15 103/13 103/15 103/17 103/24 118/8 137/2 173/24	managing [1] 155/6	mean [21] 20/7 20/8 22/23 40/21 65/24 72/24 119/21 126/11 128/17 129/1 129/23 131/21 135/1 140/25 141/2 143/18 161/8 161/17 164/11 171/22 178/19
likely [3] 19/9 33/14 69/13	look [14] 46/14 46/15 69/12 74/15 87/18 90/24 91/1 97/18 99/14 117/3 137/17 157/13 162/13 172/6	main [1] 70/16	manner [1] 106/1	meaning [2] 84/12 155/23
limit [2] 134/1 134/4	looked [16] 5/2 11/1 15/7 16/1 46/8 47/12 49/19 49/21 50/7 74/3 83/5 83/6 85/14 141/7 172/5 172/5	mainly [1] 73/13	Manual [1] 88/25	means [3] 28/4 170/23 172/16
limited [7] 25/20 26/6 27/10 47/10 60/11 76/5 168/8	looking [32] 16/14 16/17 22/20 31/21 39/14 39/15 45/1 48/17 48/17 56/24 58/21 59/5 64/17 65/9 71/3 74/13 83/13 91/15 99/19 100/2 128/20 128/22 128/24 133/7 133/25 156/4 157/14 158/2 160/19 175/17 175/20 176/12	maintain [1] 76/7	manually [1] 77/19	meant [2] 44/25 61/4
limits [1] 134/7	looks [2] 94/23 118/18	maintained [1] 43/21	many [12] 8/19 40/24 53/14 61/14 88/23 89/9 90/2 95/10 99/9 125/15 165/4 173/13	media [1] 56/10
line [23] 8/16 11/3 18/19 39/8 39/14 39/15 49/16 49/16 52/20 57/17 65/15 67/21 68/12 68/18 85/24 90/22 93/18 112/10 112/10 112/15 117/2 132/17 137/3	loss [39] 2/12 21/5 21/12 31/16 31/18 32/4 32/10 32/19 43/19 44/14 45/13 45/16 45/19 45/23 59/3 76/8 76/11 76/12 76/14 77/1 78/7 79/11 82/12 82/23 97/16 128/15 129/3 141/6 143/22 144/12 154/24 155/20 157/20 160/12 160/18 161/16 162/16 163/4 163/5	Mail/Police [1] 173/24	March [7] 43/6 73/25 75/24 101/20 121/22 144/5 164/21	meeting [7] 17/9 117/1 137/14 145/7 172/4 176/5 177/5
lines [5] 11/10 22/2 50/23 68/10 171/25	losses [13] 5/2 26/5 27/9 27/24 28/5 28/9 61/13 79/6 132/3 144/1 148/19 162/24 164/12	major [2] 5/11 177/19	March 2011 [1] 101/20	meetings [5] 20/16 116/1 122/16 166/17 167/6
link [1] 137/1	lost [2] 78/3 169/7	make [16] 1/9 60/25 64/9 102/2 102/14 102/15 128/2 131/13 139/2 155/14 155/24 155/25 160/24 162/1 173/13 175/1	March 2014 [1] 144/5	Megan [1] 110/19
linked [1] 23/21	lot [4] 135/20 162/18 170/21 174/5	male [1] 106/23	Marion [1] 98/6	member [4] 34/25 37/7 62/13 130/19
links [2] 55/23 68/2	lots [2] 48/21 106/17	malicious [2] 78/21 108/19	Mark [3] 69/11 176/23 176/25	members [2] 1/17 172/19
Lisa [1] 69/20	Lottery [22] 47/5 48/1 49/18 50/2 62/3 62/22 62/25 63/13 63/14 63/16 64/7 64/13 64/14 64/17 64/18 65/16 88/9 88/11 88/24 89/15 92/17 93/18	manage [2] 35/14 133/2	marks [1] 106/25	membership [1] 18/15
list [11] 17/5 23/7 24/21 25/25 57/15 121/25 122/24 123/1 123/4 123/7 135/13	ltd [1] 61/12	managed [3] 6/16 10/1 116/16	MARTIN [2] 1/7 181/2	memo [7] 42/23 75/20 75/25 79/19 80/10 81/18 167/25
listed [3] 53/20 53/21 171/1	lunch [1] 109/19	management [4] 18/9 87/3 89/15 130/3	matching [3] 57/23 59/8 134/18	memory [3] 17/15 21/6 101/7
listen [1] 136/17	M	manager [40] 6/22 8/16 9/4 9/15 18/7 18/20 24/15 24/17 37/7 37/10 37/20 62/22 77/15 88/5 112/4 112/11 112/17 113/4 113/6 113/10 114/19 115/3 117/2 122/10 122/15 130/13 132/17 135/10 135/22 136/16 137/3 140/21 148/11 154/17 154/19 160/21 168/10 168/15 168/23 169/16	material [7] 12/7 13/1 13/21 14/1 14/19 14/20 81/25	mention [3] 17/20 35/16 84/24
lists [2] 25/15 54/1	machine [2] 39/8 39/16	makes [6] 26/8 27/12 32/16 34/10 99/22 103/10	matter [8] 21/7 49/21 51/24 150/11 175/17 176/2 176/14 176/18	mentioned [8] 11/16 52/6 67/7 85/1 125/12 136/25 171/24 176/5
literally [5] 16/11 98/14 100/15 115/22 171/4		making [12] 42/19 84/1 84/3 85/8 99/10 109/14 120/11 145/8 164/7 164/10 173/10 173/14	Matters [1] 28/16	mentions [1] 170/18
litigation [2] 177/9 178/21		male [1] 106/23	maximised [1] 27/4	mentor [5] 8/17 119/25 120/8 120/9 120/13
little [9] 13/14 16/12 24/16 61/23 69/6 83/5 115/21 121/25 135/19		malicious [2] 78/21 108/19	may [28] 1/6 12/9 30/6 30/13 61/23 70/7 72/8 77/2 78/24 80/25 81/9 83/18 88/6 96/24 110/4 115/8 126/11 127/25 129/7 130/1 130/6 130/7 130/8 135/19 136/18 157/21 172/2 175/13	mentorship [2] 119/18 120/3
live [1] 147/5		manage [2] 35/14 133/2	May 2001 [1] 12/9	merely [1] 43/24
lived [1] 121/8		managed [3] 6/16 10/1 116/16	May 2010 [1] 88/6	merits [1] 178/15
Liverpool [6] 59/23 101/16 101/17 103/14 148/1 150/21		management [4] 18/9 87/3 89/15 130/3	maybe [8] 20/15 49/5 72/15 72/17 92/12 115/21 143/16 164/14	message [20] 57/9 57/10 57/12 60/23 66/4 66/17 66/20 66/24 67/2 67/6 67/7 67/20 68/8 85/18 85/21 86/21 89/25 172/17 172/21 174/21
lives [2] 149/18 150/21		manager [40] 6/22 8/16 9/4 9/15 18/7 18/20 24/15 24/17 37/7 37/10 37/20 62/22 77/15 88/5 112/4 112/11 112/17 113/4 113/6 113/10 114/19 115/3 117/2 122/10 122/15 130/13 132/17 135/10 135/22 136/16 137/3 140/21 148/11 154/17 154/19 160/21 168/10 168/15 168/23 169/16	me [42] 16/22 33/17 40/15 42/17 47/19 49/6 58/24 73/11 74/25 76/11 79/7 84/11 85/19 86/18 86/25 91/10 93/20 94/1 94/17 96/6 97/21 102/9 105/23 107/2 110/2 112/11 117/9 120/10 132/18 142/13 150/16 151/17 151/21 156/8 156/16 158/14	met [2] 21/16 144/18
local [2] 151/20 151/20		managers [26] 5/24 5/25 12/24 16/24	mentioned [8] 11/16 52/6 67/7 85/1 125/12 136/25 171/24 176/5	middle [1] 62/18
locate [1] 96/11			mentions [1] 170/18	Midlands [1] 114/6
location [1] 103/12			mentor [5] 8/17 119/25 120/8 120/9 120/13	might [21] 13/13 17/20 17/22 48/21 48/23 52/8 54/22 70/20 71/3 71/4 72/11 74/8 92/16 93/1 104/3 129/19 130/3 130/23
log [11] 60/22 77/14 84/15 84/16 85/13 85/17 135/9 135/12 154/17 158/8 159/10			memory [3] 17/15 21/6 101/7	
Logan [2] 116/22 138/4			mens [1] 22/24	
logging [2] 32/14 32/14			mention [3] 17/20 35/16 84/24	
logs [10] 35/25 36/3 36/11 36/12 64/12 131/4 135/20 160/16 160/16 165/19			mentioned [8] 11/16 52/6 67/7 85/1 125/12 136/25 171/24 176/5	

M	morning [3] 1/3 2/23 54/23 most [4] 1/23 44/5 77/3 145/10 mostly [2] 120/8 167/6 motivated [1] 112/25 move [1] 107/23 mounting [1] 67/22 move [3] 5/13 90/17 101/2 moved [5] 4/25 5/19 7/5 8/17 151/19 moving [5] 5/14 113/23 117/18 122/20 147/12 Mr [118] 1/6 1/10 1/13 2/2 2/5 2/14 2/23 3/21 9/12 16/20 17/25 19/6 29/23 33/11 36/25 38/2 39/4 39/12 39/18 39/20 39/24 40/7 40/17 41/6 41/7 41/10 43/7 43/23 44/7 50/6 50/7 52/15 54/2 54/11 55/8 57/17 58/8 59/15 59/21 59/25 60/2 61/24 62/1 62/6 62/18 63/2 64/8 65/20 67/18 71/17 71/25 75/2 75/25 77/7 80/10 81/7 81/9 81/20 83/2 86/7 86/13 86/14 89/12 91/8 95/18 95/19 95/20 96/3 96/10 96/17 96/19 96/22 97/8 97/11 97/23 98/9 98/12 99/4 100/9 100/11 100/12 100/18 101/15 101/18 102/21 103/22 106/6 107/25 109/16 110/4 110/8 125/17 126/6 127/14 146/4 146/9 146/13 150/19 150/25 151/5 151/11 152/2 152/6 152/9 152/24 153/15 153/20 163/5 163/13 164/15 165/5 165/18 169/16 175/24 179/8 179/15 179/17 181/10 Mr Bradshaw [20] 59/21 60/2 101/15 103/22 106/6 107/25 146/13 150/19 150/25 151/5 151/11 152/2 152/6 152/9 152/24 153/15 153/20 163/5 163/13 164/15 Mr Canner [1] 39/18 Mr Christopher [1] 101/18 Mr Christopher Knight [1] 59/25	Mr Daily [6] 39/20 39/24 96/19 99/4 100/11 100/18 Mr Daley [1] 41/6 Mr Darlington [2] 43/23 44/7 Mr Darlington's [2] 50/7 54/2 Mr Holmes [12] 39/4 39/12 40/7 40/17 41/7 41/10 96/3 96/22 97/8 98/9 98/12 100/9 Mr Holmes' [5] 50/6 96/10 96/17 97/11 100/12 Mr Ishaq [1] 146/9 Mr Ishaq's [1] 146/4 Mr Jacobs [3] 95/19 95/20 181/10 Mr Jenkins [2] 81/7 175/24 Mr Knight [11] 1/6 2/23 3/21 54/11 55/8 86/7 86/13 89/12 91/8 95/18 109/16 Mr Knight's [11] 9/12 16/20 17/25 19/6 29/23 33/11 36/25 38/2 65/20 71/17 75/2 Mr Moloney [1] 86/14 Mr Paul [1] 71/25 Mr Posnett [3] 125/17 126/6 127/14 Mr Ryan [7] 110/4 110/8 165/5 165/18 179/8 179/15 179/17 Mr Scott [1] 67/18 Mr Singh [1] 43/7 Mr Smith [3] 1/10 1/13 2/14 Mr Smith's [2] 2/2 2/5 Mr Stein [1] 102/21 Mr Thorneycroft [4] 62/1 62/6 63/2 64/8 Mr Thorneycroft's [1] 62/18 Mr Ward [2] 57/17 58/8 Mr Ward's [2] 59/15 61/24 Mr Williams [1] 169/16 Mr Wilson [6] 52/15 77/7 80/10 81/9 81/20 83/2 Mr Wilson's [1] 75/25 Mrs [33] 47/3 47/8 47/23 48/12 48/14 49/3 49/17 49/21 50/24 51/13 52/3 59/22 62/4 63/9 64/6 64/10 65/13 73/16	74/4 74/16 74/18 77/10 77/24 78/2 79/10 84/2 86/1 86/1 91/15 107/6 107/23 108/10 109/12 Mrs Hall [9] 47/3 47/8 47/23 48/12 48/14 49/17 50/24 86/1 91/15 Mrs Hall's [7] 49/3 49/21 62/4 63/9 64/6 64/10 65/13 Mrs Henderson [8] 52/3 74/4 74/18 77/10 77/24 78/2 84/2 86/1 Mrs Henderson's [4] 51/13 73/16 74/16 79/10 Mrs Rita [1] 59/22 Mrs Threlfall [4] 107/6 107/23 108/10 109/12 Ms [62] 2/19 2/22 25/6 52/21 53/15 53/25 54/4 59/20 69/5 71/21 72/1 86/10 86/12 86/17 86/17 88/19 89/24 90/10 90/18 90/19 90/20 92/15 95/3 96/21 99/18 101/3 101/9 101/11 101/16 101/25 102/7 102/17 105/15 107/17 109/12 109/17 110/6 147/19 147/19 148/11 148/12 149/9 149/9 149/21 149/21 150/2 150/3 150/7 150/25 152/2 152/17 153/3 153/4 153/12 153/15 161/7 161/7 169/15 179/23 181/6 181/8 181/14 Ms Hall [6] 86/17 90/10 90/20 92/15 95/3 109/12 Ms Hall's [3] 88/19 89/24 90/18 Ms Henderson [2] 71/21 86/17 Ms Henderson's [1] 72/1 MS MILLAR [3] 110/6 179/23 181/14 Ms Millar's [1] 169/15 Ms Nield [8] 148/11 149/9 149/21 150/3 150/7 150/25 152/2 161/7 Ms Nield's [2] 147/19 153/4 Ms Owen [3] 53/15 53/25 54/4	Ms Owen's [2] 52/21 69/5 Ms Patrick [3] 86/10 86/12 181/8 Ms Price [10] 2/19 2/22 25/6 90/19 96/21 99/18 101/3 101/9 109/17 181/6 Ms Rita Threlfall [1] 101/16 Ms Sefton [8] 147/19 148/12 149/9 149/21 150/2 152/17 153/3 161/7 Ms Sefton's [2] 153/12 153/15 Ms Threlfall [6] 59/20 101/11 101/25 102/7 102/17 105/15 Ms Threlfall's [1] 107/17 much [11] 41/8 48/3 76/21 76/22 76/23 109/14 111/14 136/23 144/20 165/11 179/17 muchly [1] 57/25 Murphy [1] 55/16 must [15] 13/3 19/25 20/3 20/5 27/14 54/16 61/14 64/4 79/15 80/7 98/7 137/3 159/6 159/16 161/9 my [56] 2/23 8/16 11/23 17/7 17/13 17/15 21/4 21/19 24/5 25/9 25/9 25/13 38/3 38/5 40/23 54/1 55/20 55/20 56/13 56/25 62/23 65/4 66/16 66/18 68/2 70/13 71/25 72/2 72/18 78/17 79/1 80/24 85/10 86/13 94/21 97/21 102/9 102/23 105/7 110/19 113/7 113/15 117/7 117/13 120/18 120/21 124/11 132/17 143/3 143/9 147/8 161/17 163/24 167/23 169/1 171/15 myself [5] 15/17 69/11 93/21 121/8 138/3
			N	
			name [17] 2/23 3/1 5/8 5/10 5/11 37/13 49/8 86/13 106/22 110/7 110/19 116/21 123/19 154/18 158/9 170/16 174/2 name' [1] 75/12 named [3] 43/9 79/3 80/14	

N	28/8 29/7 35/3 35/23 37/18 40/18 40/19 40/20 42/17 44/7 45/10 45/25 54/14 61/11 62/21 63/9 64/16 64/25 64/25 67/24 74/9 80/18 86/9 86/9 93/5 94/9 96/18 96/20 97/12 97/14 97/16 99/24 100/17 102/14 102/24 104/14 105/18 107/16 115/18 116/9 118/2 118/13 119/7 120/2 121/17 125/12 126/4 128/7 128/13 133/9 133/13 134/8 134/23 135/1 135/5 137/1 138/8 138/10 139/10 139/23 140/15 142/9 142/16 144/2 144/19 145/18 147/11 151/25 152/7 152/10 152/19 154/10 155/11 155/13 155/20 157/20 158/1 158/3 158/4 158/6 158/15 159/3 160/17 161/1 161/4 161/15 162/1 162/17 163/16 163/16 164/2 164/5 164/8 165/2 167/10 168/17 168/20 169/9 169/11 169/20 171/5 172/25 173/20 175/9 176/1 176/10 176/11 176/21 177/12 177/17 177/17 177/19 178/2 179/13 179/13	58/14 58/19 59/8 60/17 61/15 64/11 65/14 65/22 66/10 66/16 67/5 68/16 68/17 70/2 70/6 70/23 71/4 71/7 71/8 72/3 72/16 72/22 73/11 73/17 74/20 75/17 76/15 79/4 79/5 79/11 79/16 80/14 82/16 82/21 83/10 84/2 87/10 93/1 94/9 98/2 98/10 99/4 99/23 100/14 100/18 103/25 104/4 104/14 105/4 106/13 107/3 107/16 107/16 108/13 108/22 111/21 111/22 113/18 115/8 115/18 116/22 117/8 118/13 126/10 126/13 130/4 130/23 133/2 133/11 133/13 133/17 133/22 134/6 134/18 137/1 138/2 138/10 144/2 144/19 145/18 146/18 149/16 152/17 157/1 160/23 161/20 162/9 162/11 163/6 164/8 164/9 164/15 164/16 166/8 169/23 172/25 173/12 175/9 175/11 178/10	114/15 155/20 160/13 168/5 178/17 179/24 NPA [1] 119/9 NPA01 [3] 106/15 126/17 126/22 NPA02 [1] 126/18 number [40] 1/15 10/13 23/7 23/9 23/13 23/17 23/22 28/14 30/9 49/20 53/19 61/7 66/14 67/22 68/24 70/25 85/23 86/14 88/15 90/19 94/2 94/18 95/23 96/11 112/8 113/20 115/9 120/7 121/18 121/22 122/23 124/25 126/24 134/2 134/4 134/11 149/6 152/12 166/22 176/24 numbers [4] 57/23 59/8 114/11 134/18 numerous [2] 29/14 88/24 NVQ [1] 8/12	82/16 occurred [7] 1/24 42/18 77/2 78/7 82/13 82/23 153/25 October [3] 3/7 42/6 49/9 off [7] 32/14 53/5 70/16 94/7 105/22 124/10 131/3 offence [2] 22/24 142/4 offences [4] 6/2 6/13 126/16 143/15 offender [4] 41/18 119/10 141/19 141/25 offenders [2] 27/14 118/23 offer [1] 77/25 offered [1] 118/3 offering [1] 41/10 office [99] 3/22 3/23 4/1 4/9 4/19 5/6 5/8 6/12 6/17 9/4 18/12 18/22 18/25 25/5 25/17 25/20 29/13 29/19 32/13 34/12 38/7 43/4 43/6 45/13 46/24 47/10 53/21 56/19 59/24 60/11 61/6 61/10 61/12 61/13 64/10 70/22 75/14 76/4 76/20 77/16 78/9 80/9 89/14 89/20 97/17 101/17 103/15 103/17 103/19 104/25 105/2 105/21 108/11 111/5 111/9 111/13 113/2 113/16 115/19 117/23 123/25 124/4 124/6 127/10 127/13 127/19 130/14 146/3 147/14 148/12 148/22 148/25 149/4 150/1 150/22 150/22 153/25 154/1 154/24 155/6 155/16 155/19 155/21 156/14 156/15 156/18 157/19 160/11 160/15 165/22 166/1 166/10 166/16 166/20 167/12 168/1 168/8 169/24 179/5 officer [35] 4/4 4/10 4/11 4/18 7/13 14/18 14/25 15/2 15/11 15/16 15/21 38/12 59/17 71/24 75/5 96/14 98/4 98/11 98/14 99/3 99/5 99/7 100/15 100/21 100/25 120/20 121/2 144/24 145/2 145/4 145/13 145/19 145/24 155/4 155/7
namely [1] 53/6 names [1] 166/19 National [2] 18/7 111/17 nature [2] 29/16 78/21 NBSC [3] 35/25 36/3 36/11 nearly [3] 78/3 106/3 120/20 necessary [6] 27/22 30/13 82/2 130/14 132/25 145/17 need [14] 1/8 28/19 28/25 53/2 69/14 69/21 70/4 80/4 81/7 120/12 136/22 141/7 148/9 148/23 needed [6] 17/11 30/14 37/4 50/19 173/6 174/8 Negative [1] 77/20 Neil [2] 61/22 63/4 network [5] 5/3 6/14 6/19 18/21 88/3 never [11] 8/23 37/24 66/18 85/8 85/16 102/10 120/18 126/9 133/4 134/23 147/4 new [25] 2/18 13/25 26/9 26/16 26/17 39/17 94/13 94/15 94/15 122/10 125/15 126/8 135/25 137/8 137/24 138/6 138/19 138/25 139/12 140/8 175/11 175/17 176/12 176/14 176/18 New Year [1] 2/18 Newcastle [1] 132/8 newly [1] 5/14 Newton [1] 43/25 next [14] 41/20 42/3 60/7 60/8 71/21 86/18 87/19 94/12 94/13 136/21 151/2 155/18 168/14 178/13 NFSP [1] 18/16 nice [1] 108/22 Nield [12] 111/2 147/13 148/2 148/11 149/9 149/21 150/3 150/7 150/25 152/2 155/5 161/7 Nield's [2] 147/19 153/4 nine [2] 40/1 74/1 no [131] 2/11 7/9 7/15 11/6 11/21 16/6 16/11 21/9 23/14 23/14 23/20 23/25 23/25 27/20 28/7 28/7	28/8 29/7 35/3 35/23 37/18 40/18 40/19 40/20 42/17 44/7 45/10 45/25 54/14 61/11 62/21 63/9 64/16 64/25 64/25 67/24 74/9 80/18 86/9 86/9 93/5 94/9 96/18 96/20 97/12 97/14 97/16 99/24 100/17 102/14 102/24 104/14 105/18 107/16 115/18 116/9 118/2 118/13 119/7 120/2 121/17 125/12 126/4 128/7 128/13 133/9 133/13 134/8 134/23 135/1 135/5 137/1 138/8 138/10 139/10 139/23 140/15 142/9 142/16 144/2 144/19 145/18 147/11 151/25 152/7 152/10 152/19 154/10 155/11 155/13 155/20 157/20 158/1 158/3 158/4 158/6 158/15 159/3 160/17 161/1 161/4 161/15 162/1 162/17 163/16 163/16 164/2 164/5 164/8 165/2 167/10 168/17 168/20 169/9 169/11 169/20 171/5 172/25 173/20 175/9 176/1 176/10 176/11 176/21 177/12 177/17 177/17 177/19 178/2 179/13 179/13 nobody [5] 40/22 68/13 82/12 82/22 154/4 non [2] 106/15 179/24 Non-police [1] 106/15 normal [1] 170/10 normally [2] 14/24 145/11 north [3] 59/23 101/17 114/6 not [148] 1/12 2/1 2/1 9/21 14/9 17/16 17/20 18/4 18/15 19/15 19/16 21/10 23/3 23/20 25/8 26/6 27/10 29/3 30/7 35/7 36/5 38/3 38/6 40/5 40/23 41/1 41/15 42/15 42/17 42/20 43/23 44/17 45/15 46/23 47/10 47/13 47/21 48/5 48/6 48/13 48/20 48/24 49/22 51/2 52/7 56/18 56/21 57/23	58/14 58/19 59/8 60/17 61/15 64/11 65/14 65/22 66/10 66/16 67/5 68/16 68/17 70/2 70/6 70/23 71/4 71/7 71/8 72/3 72/16 72/22 73/11 73/17 74/20 75/17 76/15 79/4 79/5 79/11 79/16 80/14 82/16 82/21 83/10 84/2 87/10 93/1 94/9 98/2 98/10 99/4 99/23 100/14 100/18 103/25 104/4 104/14 105/4 106/13 107/3 107/16 107/16 108/13 108/22 111/21 111/22 113/18 115/8 115/18 116/22 117/8 118/13 126/10 126/13 130/4 130/23 133/2 133/11 133/13 133/17 133/22 134/6 134/18 137/1 138/2 138/10 144/2 144/19 145/18 146/18 149/16 152/17 157/1 160/23 161/20 162/9 162/11 163/6 164/8 164/9 164/15 164/16 166/8 169/23 172/25 173/12 175/9 175/11 178/10 note [2] 76/12 84/25 notebook [2] 10/9 118/24 notes [3] 20/11 62/8 119/9 nothing [10] 31/22 46/20 84/24 85/1 86/25 94/20 108/18 147/11 165/2 173/10 notice [2] 130/11 151/22 noticed [1] 130/1 notices [1] 97/2 notifications [1] 28/20 notify [2] 1/10 174/8 notwithstanding [1] 85/13 November [6] 24/20 25/2 51/12 83/3 83/15 110/11 now [41] 1/25 4/5 27/19 35/13 35/15 39/18 45/1 48/17 51/1 58/21 63/7 63/19 65/5 65/9 80/21 88/19 89/12 90/5 90/18 91/18 92/15 93/13 95/2 96/11 97/6 97/18 99/19 100/9 101/24 102/17 103/8 105/11 106/6 108/16 109/20	O objective [5] 144/11 144/15 144/15 144/16 144/18 objectives [2] 144/5 144/7 obligation [3] 11/10 11/17 74/11 obligations [3] 7/25 12/2 119/18 obliged [1] 179/20 observer [1] 72/7 obtain [6] 30/10 30/15 30/25 75/13 79/13 81/7 obtained [9] 26/11 26/22 27/4 31/9 75/6 75/16 80/25 83/1 131/1 obtaining [1] 32/23 obviously [33] 24/5 25/19 29/12 32/10 32/12 33/2 44/20 44/25 56/8 62/13 62/15 65/1 65/3 66/5 66/22 68/7 98/20 98/21 122/10 131/3 131/14 132/4 137/10 141/7 143/17 151/20 159/4 161/8 161/19 161/20 164/18 166/1 169/20 occasion [4] 72/13 76/17 131/22 133/4 occasionally [1] 131/23 occasions [1] 132/3 occur [3] 71/2 74/6	

<p>O</p> <p>Officers [3] 14/3 14/15 120/7</p> <p>offices [2] 61/14 69/24</p> <p>often [1] 161/10</p> <p>Oh [4] 87/2 94/12 96/11 101/12</p> <p>OIC [3] 154/25 155/2 155/14</p> <p>okay [13] 25/11 39/5 41/2 57/11 85/1 91/10 93/13 96/7 102/4 138/15 156/17 159/1 170/1</p> <p>old [3] 105/9 105/9 117/7</p> <p>on [293]</p> <p>on Investigators [1] 23/12</p> <p>once [5] 37/2 121/18 128/18 145/18 176/17</p> <p>one [53] 2/13 2/17 6/6 12/16 15/4 18/5 24/20 28/7 34/10 34/11 37/22 38/13 39/6 39/17 41/4 48/22 54/2 55/9 56/9 57/1 81/4 102/11 114/15 115/25 116/2 116/2 116/11 116/16 117/1 117/1 119/8 125/17 127/7 132/2 136/6 137/23 138/15 140/6 140/13 145/10 147/1 148/3 149/16 158/14 158/14 161/12 163/23 165/18 168/20 169/4 171/24 174/7 175/13</p> <p>one's [1] 39/11</p> <p>ones [7] 53/24 69/25 115/25 116/2 116/2 134/4 175/5</p> <p>ongoing [1] 152/19</p> <p>online [4] 88/14 94/10 94/10 95/14</p> <p>only [30] 5/21 5/22 15/4 24/10 26/6 27/10 33/6 72/6 72/21 72/25 73/2 73/5 76/4 80/7 88/7 90/22 107/23 115/20 116/12 116/12 120/6 124/7 124/9 127/12 132/2 135/1 158/16 160/21 161/19 177/24</p> <p>onto [3] 94/12 94/13 94/15</p> <p>open [4] 76/4 78/5 129/9 129/10</p> <p>opened [1] 126/11</p> <p>operations [1] 173/24</p>	<p>opinion [3] 79/1 143/7 143/9</p> <p>opinionated [1] 172/11</p> <p>opportunity [2] 73/22 74/15</p> <p>opposed [2] 38/21 178/8</p> <p>Ops [1] 88/25</p> <p>options [2] 5/13 126/24</p> <p>or [119] 5/23 7/1 8/16 8/17 9/5 11/2 16/9 17/2 17/13 18/4 18/7 18/12 18/19 18/23 19/10 19/13 19/18 20/4 20/16 21/6 21/11 21/18 22/5 22/13 22/18 23/21 23/23 27/18 28/1 29/15 29/16 30/6 30/8 30/10 31/13 32/9 33/3 34/7 34/16 34/24 36/9 37/3 38/7 42/19 43/19 44/14 44/24 45/4 45/11 45/12 48/11 48/22 53/12 56/11 56/19 58/3 58/18 61/11 64/9 66/2 66/4 66/4 67/4 67/18 70/2 70/18 72/15 72/18 73/4 75/5 77/20 78/21 81/15 81/24 82/23 85/9 85/22 87/19 90/12 97/4 99/12 104/5 104/13 106/24 107/10 107/11 107/11 108/23 111/22 113/18 115/6 126/13 130/2 130/18 131/12 132/2 133/7 135/15 136/15 136/18 136/25 141/1 143/20 144/15 145/2 145/22 148/1 156/13 158/18 161/6 161/8 162/8 164/7 166/1 166/8 169/10 175/7 175/13 178/10</p> <p>oral [2] 167/5 167/6</p> <p>order [3] 21/1 71/20 102/15</p> <p>Orders [1] 27/6</p> <p>ordinarily [1] 164/11</p> <p>original [1] 69/8</p> <p>originally [1] 108/10</p> <p>other [38] 5/13 17/19 29/14 32/13 34/11 51/5 61/7 63/10 65/11 65/23 66/25 66/25 67/11 68/25 79/23 80/3 81/24 89/11 90/3 92/21 92/24 95/23 98/17 99/1 116/11 116/16 122/14 122/18</p>	<p>127/3 133/19 140/17 145/22 148/18 149/16 158/18 162/2 172/18 175/5</p> <p>others [11] 28/14 34/13 52/19 68/23 74/2 99/9 121/22 134/11 140/7 147/20 176/24</p> <p>otherwise [1] 68/17</p> <p>ought [2] 99/13 103/6</p> <p>our [4] 17/2 66/22 67/13 69/15</p> <p>out [32] 17/5 31/22 39/16 44/11 46/23 49/16 60/4 60/6 61/7 66/3 76/22 79/3 88/23 94/19 94/20 100/14 106/14 111/20 111/23 129/11 132/21 132/21 144/4 149/13 153/18 155/23 156/16 159/4 159/15 159/18 160/3 174/16</p> <p>outcome [3] 43/7 46/6 98/8</p> <p>outlined [1] 80/24</p> <p>outset [1] 130/15</p> <p>outside [5] 29/20 67/8 85/10 137/4 150/11</p> <p>over [38] 1/15 2/16 2/17 2/19 4/21 5/2 5/22 8/17 11/14 14/16 15/21 16/23 17/15 17/23 22/1 33/1 33/5 60/7 60/7 60/10 61/8 61/23 75/21 79/19 80/6 82/15 93/13 94/9 95/10 105/7 111/12 114/13 116/13 128/16 132/19 149/23 152/9 166/24</p> <p>overall [1] 177/19</p> <p>overarching [2] 57/9 67/2</p> <p>oversight [1] 173/23</p> <p>overturned [2] 97/7 98/22</p> <p>overturning [1] 97/9</p> <p>overview [1] 3/22</p> <p>owed [1] 47/9</p> <p>Owen [6] 28/14 52/19 53/15 53/25 54/4 68/23</p> <p>Owen's [2] 52/21 69/5</p> <p>owing [1] 148/15</p> <p>own [10] 18/17 85/25 120/17 120/19 120/25 124/11 147/6 147/8 149/12 169/21</p> <p>owned [1] 88/3</p>	<p>P</p> <p>PACE [3] 19/17 136/16 136/24</p> <p>page [83] 3/9 9/12 10/21 11/14 14/13 14/16 14/17 16/21 17/24 19/7 22/1 29/24 33/11 37/1 38/3 38/3 38/4 38/25 39/1 40/11 40/14 42/25 43/3 44/10 46/16 46/18 49/4 49/5 49/7 49/8 49/15 59/18 59/19 60/6 60/7 60/8 61/8 62/6 62/19 65/19 71/18 75/2 75/21 75/23 79/19 79/22 85/4 85/6 86/24 87/4 87/15 87/19 91/2 91/9 93/14 96/11 97/20 101/9 102/1 110/12 110/13 117/3 117/4 117/5 123/1 123/12 123/17 126/23 136/8 136/12 139/25 139/25 142/19 144/6 147/17 147/20 149/24 153/16 160/6 168/3 170/16 172/7 176/23</p> <p>page 1 [2] 87/15 123/12</p> <p>page 10 [1] 123/1</p> <p>page 11 [2] 16/21 91/2</p> <p>page 117 [1] 144/6</p> <p>page 13 [1] 19/7</p> <p>page 14 [1] 29/24</p> <p>page 16 [2] 37/1 136/12</p> <p>page 18 [2] 10/21 142/19</p> <p>page 2 [5] 49/15 86/24 117/3 126/23 153/16</p> <p>page 22 [2] 33/11 38/4</p> <p>page 27 [2] 40/11 79/22</p> <p>page 28 [2] 75/2 97/20</p> <p>page 29 [1] 71/18</p> <p>page 3 [3] 59/18 101/9 176/23</p> <p>page 37 [1] 85/4</p> <p>page 4 [1] 46/16</p> <p>page 40 [1] 65/19</p> <p>page 41 [1] 3/9</p> <p>page 43 [2] 139/25 139/25</p> <p>page 44 [1] 110/13</p> <p>page 6 [2] 147/17 147/20</p> <p>page 7 [3] 9/12 38/25</p>	<p>102/1</p> <p>page 9 [3] 38/3 38/3 170/16</p> <p>page number [1] 96/11</p> <p>pages [1] 49/6</p> <p>paid [4] 76/22 148/17 148/17 166/1</p> <p>papers [3] 17/1 76/2 76/6</p> <p>paragraph [79] 7/20 9/11 10/21 11/14 14/16 15/6 16/1 16/2 16/20 17/24 19/6 20/23 22/1 22/3 27/7 29/22 29/24 33/10 35/24 36/24 38/1 38/4 56/18 57/4 60/8 60/15 61/9 65/20 69/3 71/17 71/18 72/20 75/1 79/23 83/7 85/3 85/5 96/1 97/18 102/5 105/14 105/20 115/14 116/5 119/15 120/23 121/13 122/25 125/21 128/14 129/5 129/19 130/10 135/24 136/13 136/21 139/11 140/1 142/17 142/22 147/21 147/24 148/10 148/20 149/3 149/20 149/24 150/5 155/18 156/5 157/14 166/6 168/14 175/10 177/3 177/6 177/13 178/3 178/13</p> <p>paragraph 10 [2] 9/11 16/1</p> <p>paragraph 107 [1] 85/3</p> <p>paragraph 11 [1] 115/14</p> <p>paragraph 116 [1] 65/20</p> <p>paragraph 14 [1] 175/10</p> <p>paragraph 19 [1] 122/25</p> <p>paragraph 23 [3] 17/24 147/21 147/24</p> <p>paragraph 24 [1] 16/20</p> <p>paragraph 25 [1] 148/10</p> <p>Paragraph 26 [1] 148/20</p> <p>paragraph 27 [1] 149/3</p> <p>paragraph 28 [2] 116/5 149/20</p> <p>paragraph 29 [2] 19/6 120/23</p> <p>paragraph 3.1 [1] 27/7</p> <p>paragraph 30 [1]</p>
--	---	---	--	--

P	87/19 87/20 96/9 147/23	48/20 48/24 49/22 51/2 64/11 116/22 157/1	174/22	40/7 51/19 52/3 56/11 56/13 68/2 74/7 85/5 89/1 91/3 113/1 113/22 114/8 121/16 123/9 128/9 131/2 136/24 137/17 137/24 152/18 161/5 168/17 169/15 172/6 172/6 172/15 173/12 173/21 176/9
paragraph 30... [1] 20/23	paragraphs 44 [1] 10/17	per se [1] 31/22	placed [4] 23/12 35/11 60/24 102/16	point' [1] 149/18
paragraph 31 [1] 129/5	paragraphs 63 [1] 96/9	perceived [2] 62/25 89/8	plea [8] 35/8 80/14 83/8 83/11 84/1 84/25 85/9 85/22	pointed [5] 11/2 11/11 142/4 142/25 143/14
paragraph 32 [3] 22/1 22/3 129/19	paramount [3] 26/5 27/9 27/24	perform [2] 34/13 60/12	pled [2] 77/4 83/19	points [10] 22/7 22/20 22/22 22/23 22/25 31/13 120/12 122/2 123/16 140/20
paragraph 33 [3] 29/22 29/24 149/24	parcel [4] 102/16 103/5 103/23 104/21	performance [4] 23/16 24/15 24/17 115/25	pleaded [4] 43/9 43/22 52/4 148/3	POL [3] 10/5 36/16 88/23
paragraph 36 [1] 128/14	Pardoe [1] 168/16	performed [4] 9/20 34/7 34/16 60/10	please [148] 1/6 3/1 3/9 3/21 7/11 9/11 10/20 11/14 12/4 14/16 16/18 16/20 17/24 19/3 19/6 22/1 23/1 24/12 24/16 24/20 24/22 25/1 26/21 28/12 29/22 33/10 33/11 36/22 36/24 38/1 38/2 38/9 38/25 39/1 40/11 41/16 42/22 42/24 43/4 46/2 46/16 47/15 48/25 49/4 49/7 49/15 51/9 52/17 52/24 53/16 54/25 55/15 56/1 57/13 57/22 59/11 59/18 60/8 60/14 61/8 61/20 62/1 62/5 65/19 68/20 69/6 69/10 70/2 71/12 71/16 75/1 75/19 75/21 75/24 77/8 78/22 79/19 80/12 81/17 83/2 83/4 84/13 84/20 85/4 91/2 91/5 97/19 101/13 102/1 102/5 105/19 109/19 110/4 110/7 112/6 113/23 116/24 116/25 117/4 118/15 121/20 121/21 121/25 123/1 123/4 123/11 123/12 124/23 126/22 126/23 129/9 134/9 134/10 134/17 136/4 136/5 136/8 136/12 137/11 137/12 137/18 139/25 144/3 144/4 144/6 146/1 147/16 147/17 147/20 153/12 153/16 155/16 156/14 158/8 159/8 159/9 160/6 165/6 167/24 167/25 168/3 170/14 170/15 170/17 175/22 176/22 176/23 176/25	POL00019111 [1] 84/14
paragraph 37 [1] 130/10	part [17] 5/15 8/5 8/11 52/4 72/4 78/18 86/5 89/20 99/1 100/5 102/19 112/2 135/8 135/11 135/15 157/6 159/24	perhaps [3] 96/7 100/20 101/6	pledged [4] 43/9 43/22 52/4 148/3	POL00021244 [1] 46/3
paragraph 38 [1] 35/24	partial [1] 38/22	period [16] 6/21 9/24 39/25 42/6 75/10 78/8 79/17 80/6 80/18 81/14 81/21 93/10 113/12 120/15 121/4 139/18	please [148] 1/6 3/1 3/9 3/21 7/11 9/11 10/20 11/14 12/4 14/16 16/18 16/20 17/24 19/3 19/6 22/1 23/1 24/12 24/16 24/20 24/22 25/1 26/21 28/12 29/22 33/10 33/11 36/22 36/24 38/1 38/2 38/9 38/25 39/1 40/11 41/16 42/22 42/24 43/4 46/2 46/16 47/15 48/25 49/4 49/7 49/15 51/9 52/17 52/24 53/16 54/25 55/15 56/1 57/13 57/22 59/11 59/18 60/8 60/14 61/8 61/20 62/1 62/5 65/19 68/20 69/6 69/10 70/2 71/12 71/16 75/1 75/19 75/21 75/24 77/8 78/22 79/19 80/12 81/17 83/2 83/4 84/13 84/20 85/4 91/2 91/5 97/19 101/13 102/1 102/5 105/19 109/19 110/4 110/7 112/6 113/23 116/24 116/25 117/4 118/15 121/20 121/21 121/25 123/1 123/4 123/11 123/12 124/23 126/22 126/23 129/9 134/9 134/10 134/17 136/4 136/5 136/8 136/12 137/11 137/12 137/18 139/25 144/3 144/4 144/6 146/1 147/16 147/17 147/20 153/12 153/16 155/16 156/14 158/8 159/8 159/9 160/6 165/6 167/24 167/25 168/3 170/14 170/15 170/17 175/22 176/22 176/23 176/25	POL00021252 [1] 90/25
paragraph 39 [2] 142/17 142/22	Participants [4] 1/12 86/8 109/10 179/12	period [16] 6/21 9/24 39/25 42/6 75/10 78/8 79/17 80/6 80/18 81/14 81/21 93/10 113/12 120/15 121/4 139/18	pledged [4] 43/9 43/22 52/4 148/3	POL00031005 [1] 136/4
paragraph 40 [1] 36/24	participate [1] 152/21	permitted [1] 72/8	pledged [4] 43/9 43/22 52/4 148/3	POL00044010 [1] 153/13
paragraph 45 [1] 119/15	particular [5] 12/16 39/6 79/8 110/25 173/12	persecuted [1] 107/9	pledged [4] 43/9 43/22 52/4 148/3	POL00044222 [1] 154/15
paragraph 47 [1] 10/21	particularly [4] 34/15 85/25 140/15 172/9	person [15] 14/18 14/25 15/3 20/21 22/18 72/5 73/14 80/8 98/17 104/12 105/2 106/18 113/19 135/11 155/8	pledged [4] 43/9 43/22 52/4 148/3	POL00044223 [1] 159/9
paragraph 48 [1] 121/13	parties [1] 119/17	personal [6] 123/20 123/23 124/8 136/17 144/14 172/11	pledged [4] 43/9 43/22 52/4 148/3	POL00044501 [1] 77/9
paragraph 49 [3] 11/14 15/6 102/5	parts [4] 5/13 49/14 49/17 163/24	personal/opinionated [1] 172/11	pledged [4] 43/9 43/22 52/4 148/3	POL00047155 [1] 75/19
paragraph 5 [1] 7/20	party [3] 45/7 67/21 173/23	personally [2] 133/6 144/17	pledged [4] 43/9 43/22 52/4 148/3	POL00047159 [1] 78/22
paragraph 5.11.6 [1] 136/13	passed [7] 22/8 37/4 131/6 141/13 141/16 172/19 172/20	perspective [1] 32/17	pledged [4] 43/9 43/22 52/4 148/3	POL00055189 [1] 80/12
paragraph 50 [1] 105/14	passenger [1] 104/1	Peter [3] 38/11 95/22 98/6	pledged [4] 43/9 43/22 52/4 148/3	POL00055314 [1] 81/17
paragraph 52 [1] 105/20	passing [4] 68/3 85/18 85/20 167/18	phantom [1] 63/1	pledged [4] 43/9 43/22 52/4 148/3	POL00055783 [2] 51/10 83/4
paragraph 53 [1] 166/6	past [4] 23/3 72/18 125/13 139/23	Phase [1] 110/23	pledged [4] 43/9 43/22 52/4 148/3	POL00066743 [1] 38/10
paragraph 56 [4] 38/1 38/4 56/18 57/4	Patrick [4] 86/10 86/12 86/13 181/8	Phase 4 [1] 110/23	pledged [4] 43/9 43/22 52/4 148/3	POL00068605 [1] 158/7
paragraph 57 [1] 33/10	pattern [1] 76/19	phone [3] 84/21 94/5 130/24	pledged [4] 43/9 43/22 52/4 148/3	POL00091063 [1] 49/1
paragraph 58 [1] 125/21	Paul [4] 71/25 118/8 118/9 168/10	phoned [2] 85/19 150/25	pledged [4] 43/9 43/22 52/4 148/3	POL00094108 [1] 167/24
paragraph 59 [2] 135/24 139/11	pause [1] 178/20	phoning [2] 150/7 151/5	pledged [4] 43/9 43/22 52/4 148/3	POL00104762 [1] 12/8
paragraph 61 [1] 69/3	pausing [2] 62/9 155/2	phrase [1] 142/13	pledged [4] 43/9 43/22 52/4 148/3	POL00104846 [1] 26/20
paragraph 69 [1] 96/1	pay [5] 47/9 47/11 83/19 154/5 166/2	physical [5] 5/24 6/6 10/7 113/25 127/5	pledged [4] 43/9 43/22 52/4 148/3	POL00105025 [1] 144/3
paragraph 73 [1] 97/18	payment [2] 149/1 160/12	piece [1] 66/5	pledged [4] 43/9 43/22 52/4 148/3	POL00107683 [2] 59/12 101/8
paragraph 75 [1] 75/1	peer [1] 17/14	pieces [1] 51/5	pledged [4] 43/9 43/22 52/4 148/3	POL00113343 [1] 147/16
paragraph 76 [1] 150/5	penny [2] 46/23 69/10	pink [1] 53/11	pledged [4] 43/9 43/22 52/4 148/3	
paragraph 79 [2] 71/17 71/18	Penny Thomas [1] 69/10	pinpoint [3] 35/17 77/1 82/12	pledged [4] 43/9 43/22 52/4 148/3	
paragraph 80 [1] 72/20	penultimate [1] 49/5	place [23] 11/5 11/21 11/22 20/24 21/2 30/3 30/23 73/25 80/5 81/2 82/1 91/7 99/21 101/20 106/12 107/2 107/5 130/7 132/21 137/14 146/7 168/25	pledged [4] 43/9 43/22 52/4 148/3	
paragraph 97 [1] 140/1	people [12] 39/22 64/20 66/14 66/25 67/16 103/11 125/15 138/1 166/22 173/2 173/9 174/14	per [9] 31/22 48/13	pledged [4] 43/9 43/22 52/4 148/3	
paragraphs [11] 10/17 60/2 60/14 78/1 78/25 81/20 83/7			pledged [4] 43/9 43/22 52/4 148/3	

<p>P</p> <p>POL00118374 [1] 126/21</p> <p>POL00120600 [1] 42/23</p> <p>POL00120627 [1] 41/17</p> <p>POL00122557 [1] 123/11</p> <p>POL00124105 [1] 176/22</p> <p>POL00125273 [1] 170/14</p> <p>POL00126810 [1] 23/2</p> <p>POL00127137 [1] 116/25</p> <p>POL00129182 [1] 118/14</p> <p>POL00129310 [1] 121/20</p> <p>POL00136717 [1] 86/21</p> <p>POL00141218 [1] 68/21</p> <p>POL00166044 [2] 137/11 172/3</p> <p>POL00167241 [1] 24/13</p> <p>POL00167242 [1] 25/1</p> <p>POL00167366 [1] 28/13</p> <p>POL00167369 [2] 57/14 134/9</p> <p>POL00169422 [1] 52/18</p> <p>POL00169423 [1] 53/17</p> <p>POL00323734 [1] 61/21</p> <p>POL00325402 [1] 55/11</p> <p>police [11] 7/21 7/24 40/24 106/15 106/20 127/6 173/24 174/5 174/8 174/9 174/17</p> <p>policies [5] 11/5 11/21 18/24 25/24 123/23</p> <p>policy [7] 11/22 12/23 122/23 123/15 124/19 136/6 138/9</p> <p>policyholder [1] 25/23</p> <p>pop [1] 53/12</p> <p>populate [1] 157/6</p> <p>populated [6] 156/16 156/22 159/15 159/18 159/25 160/3</p> <p>populating [2] 171/9 171/12</p> <p>PORA [1] 119/3</p>	<p>Porters [1] 69/19</p> <p>position [10] 63/10 63/21 73/16 85/12 118/3 126/2 140/11 140/18 166/13 175/6</p> <p>Positive [1] 77/20</p> <p>Posnett [7] 87/14 87/16 121/21 124/25 125/17 126/6 127/14</p> <p>possibility [1] 79/14</p> <p>possible [8] 1/12 2/1 2/2 6/2 6/13 27/14 41/11 136/23</p> <p>possibly [9] 10/3 20/14 36/5 40/6 77/24 107/3 128/10 143/16 163/12</p> <p>post [69] 3/22 3/23 4/1 4/9 4/19 5/6 5/8 6/12 9/4 25/5 25/17 25/20 29/13 29/19 43/4 45/12 46/23 47/10 51/17 53/21 60/11 61/10 61/12 64/10 70/22 76/4 78/8 80/8 89/14 89/20 94/21 97/16 103/15 104/24 105/2 105/21 108/11 111/5 111/9 111/13 113/2 113/16 115/19 117/22 127/10 127/13 127/19 130/14 143/19 146/3 147/14 148/12 148/22 148/25 149/4 150/1 153/25 154/1 165/22 166/1 166/10 166/16 166/20 167/12 168/1 168/8 169/24 178/18 179/5</p> <p>post-civil [1] 178/18</p> <p>postage [5] 4/24 4/24 30/10 57/23 134/18</p> <p>Postal [2] 4/4 4/10</p> <p>posthumous [1] 97/9</p> <p>postmaster [12] 72/16 130/18 130/23 154/4 155/15 160/24 161/10 168/25 169/8 169/14 169/21 174/7</p> <p>postmasters [1] 165/24</p> <p>potential [3] 69/12 130/12 164/9</p> <p>potentially [8] 18/17 18/19 28/11 58/13 67/18 69/25 71/9 145/15</p> <p>practice [5] 7/22 12/13 13/3 13/12 19/20</p> <p>Practitioners [1] 14/4</p> <p>pre [10] 60/3 72/24 73/5 122/4 156/16</p>	<p>156/22 157/6 159/15 159/25 160/3</p> <p>pre-interview [2] 72/24 73/5</p> <p>pre-interviewing/caution [1] 122/4</p> <p>pre-populate [1] 157/6</p> <p>pre-populated [5] 156/16 156/22 159/15 159/25 160/3</p> <p>prepare [2] 62/10 80/21</p> <p>prepared [1] 60/3</p> <p>preparing [4] 10/15 12/6 23/6 46/11</p> <p>present [9] 59/24 61/17 72/6 76/23 99/7 101/17 101/21 137/15 153/8</p> <p>presented [3] 69/22 70/1 70/7</p> <p>Press [1] 43/6</p> <p>pressure [4] 23/12 28/4 82/6 107/13</p> <p>pressures [1] 117/16</p> <p>presumably [4] 19/24 29/11 48/10 76/18</p> <p>presume [2] 50/20 82/18</p> <p>pretty [2] 54/10 174/19</p> <p>prevalent [1] 132/5</p> <p>previous [6] 5/23 55/20 62/8 62/23 125/13 150/23</p> <p>previously [10] 11/16 45/15 48/22 102/3 113/3 139/6 146/10 163/14 163/19 175/20</p> <p>Price [11] 2/19 2/22 2/24 25/6 90/19 96/21 99/18 101/3 101/9 109/17 181/6</p> <p>primary [1] 99/5</p> <p>principle [1] 85/6</p> <p>principles [1] 14/14</p> <p>print [6] 123/24 124/5 124/10 124/11 124/16 124/17</p> <p>printed [2] 31/9 60/22</p> <p>printer [1] 124/8</p> <p>printers [1] 124/9</p> <p>printouts [2] 31/8 31/11</p> <p>prior [5] 75/10 79/17 130/11 146/12 178/6</p> <p>privy [1] 179/6</p> <p>prizes [1] 88/12</p> <p>prizes/stock [1] 88/12</p> <p>probability [1] 178/9</p>	<p>probably [29] 35/16 36/13 36/14 36/20 37/13 56/13 64/24 65/4 65/9 67/12 71/7 73/13 73/13 78/17 79/24 92/5 92/8 99/23 105/4 119/23 121/6 123/8 133/2 133/25 143/21 150/21 150/23 168/23 174/19</p> <p>problem [13] 29/8 47/25 71/4 88/6 90/7 94/25 125/10 139/6 142/16 155/12 157/3 157/15 162/18</p> <p>problems [19] 16/9 38/8 39/6 40/8 47/22 56/20 69/13 89/11 89/14 89/18 91/17 92/16 92/16 92/24 95/4 95/10 164/9 164/16 166/5</p> <p>procedure [8] 12/12 13/2 13/7 13/11 13/22 27/2 71/23 99/25</p> <p>procedures [5] 12/25 18/24 26/1 26/9 26/18</p> <p>proceed [7] 44/5 83/21 84/8 137/4 141/21 169/2 178/17</p> <p>proceeding [1] 82/22</p> <p>proceedings [2] 14/22 109/13</p> <p>process [19] 11/5 17/4 18/1 18/4 18/12 30/14 35/14 37/25 45/25 87/24 97/12 99/21 100/24 107/15 118/24 137/4 161/23 163/23 163/24</p> <p>processing [1] 149/15</p> <p>produce [2] 131/5 137/19</p> <p>produced [6] 31/12 32/18 49/2 59/13 71/5 177/7</p> <p>produces [1] 77/19</p> <p>producing [1] 80/2</p> <p>product [3] 29/15 29/16 88/7</p> <p>professional [2] 24/1 111/4</p> <p>Profile [1] 170/15</p> <p>programme [1] 88/4</p> <p>progress [3] 22/10 71/20 78/20</p> <p>progressed [1] 23/19</p> <p>progressing [1] 23/11</p> <p>prolonged [1] 8/22</p> <p>promoted [1] 4/9</p> <p>prompted [1] 152/8</p> <p>prompting [1] 138/24</p>	<p>proof [4] 45/13 45/23 97/16 178/7</p> <p>properly [3] 99/13 100/11 100/23</p> <p>Property [2] 26/10 26/22</p> <p>proposed [2] 44/5 122/1</p> <p>prosecute [3] 35/5 141/22 178/18</p> <p>prosecuted [6] 28/10 37/17 86/15 98/20 108/10 143/23</p> <p>prosecution [23] 24/4 27/18 36/23 37/9 37/11 37/23 43/13 43/25 50/12 51/11 66/10 71/13 80/4 80/21 82/6 82/9 83/12 96/3 97/11 97/22 106/15 126/16 150/2</p> <p>prosecution's [1] 177/5</p> <p>prosecutions [10] 23/13 23/22 28/4 66/8 70/8 70/21 71/5 175/12 176/19 178/20</p> <p>prosecutorial [1] 22/14</p> <p>Prosecutors [2] 14/3 14/11</p> <p>prospect [1] 79/2</p> <p>prove [9] 22/7 22/21 22/23 45/19 59/3 66/10 66/11 80/5 122/3</p> <p>proved [2] 22/22 32/19</p> <p>provide [9] 17/10 26/25 52/25 116/8 133/14 143/14 147/7 157/11 174/11</p> <p>provided [32] 11/6 12/5 12/18 12/21 23/5 38/14 38/17 39/17 46/10 46/13 70/12 70/20 72/25 105/18 116/6 118/25 119/2 122/22 123/6 124/24 131/10 134/2 136/1 136/7 142/3 142/25 146/22 154/7 154/10 164/20 175/5 176/6</p> <p>providing [10] 3/4 15/18 21/16 38/16 55/23 73/12 115/15 133/24 171/3 179/19</p> <p>provisions [1] 26/16</p> <p>public [3] 1/9 172/12 178/16</p> <p>public/requested [1] 172/12</p> <p>publicly [1] 1/17</p> <p>published [3] 26/13</p>
--	---	--	---	--

<p>P</p> <p>published... [2] 170/4 170/20</p> <p>pull [1] 105/10</p> <p>Purpose [2] 12/22 26/24</p> <p>purposes [7] 3/19 10/15 12/5 23/6 38/15 46/11 110/18</p> <p>pursue [5] 11/10 65/15 68/9 68/17 175/11</p> <p>pursuit [1] 82/10</p> <p>put [20] 46/21 51/17 62/7 62/16 69/14 70/13 77/4 92/3 93/25 100/20 105/2 125/8 155/13 157/17 160/13 168/24 170/25 171/16 172/25 173/3</p> <p>puts [1] 54/1</p> <p>putting [4] 108/5 108/6 171/13 171/19</p>	<p>157/24 162/16 171/15</p> <p>quota [1] 35/11</p> <p>quotas [1] 35/17</p> <hr/> <p>R</p> <p>raise [7] 18/6 99/11 99/21 128/7 128/8 128/11 145/23</p> <p>raised [19] 21/10 29/5 30/12 30/24 49/18 50/23 54/19 64/23 65/7 67/23 98/12 112/8 127/24 129/21 130/3 139/13 145/21 168/25 176/7</p> <p>raising [7] 40/8 48/15 50/6 71/1 90/20 92/21 128/6</p> <p>ran [1] 88/15</p> <p>range [1] 4/3</p> <p>rarely [1] 148/14</p> <p>rate [2] 39/3 144/13</p> <p>rather [8] 75/8 75/12 108/5 113/5 127/10 147/6 152/21 155/10</p> <p>rationale [1] 79/8</p> <p>Raymond [2] 176/24 176/25</p> <p>re [3] 1/7 79/25 181/2</p> <p>re-input [1] 79/25</p> <p>rea [1] 22/25</p> <p>reached [3] 21/5 149/17 178/11</p> <p>reaching [1] 21/12</p> <p>read [22] 29/11 29/11 38/18 49/11 54/16 60/3 73/22 75/11 80/16 87/20 87/21 87/22 91/14 93/13 102/21 124/12 126/12 147/21 153/18 154/23 157/23 177/13</p> <p>readily [1] 60/13</p> <p>reading [8] 26/2 27/19 41/14 58/4 104/18 168/22 169/4 169/16</p> <p>reads [8] 28/17 51/14 52/21 69/5 76/1 80/13 153/23 178/13</p> <p>ready [1] 104/4</p> <p>realising [1] 22/17</p> <p>realistic [1] 79/2</p> <p>really [12] 41/1 80/4 92/5 99/17 115/21 116/9 116/14 120/19 121/6 126/9 128/7 135/2</p> <p>reason [16] 33/6 64/22 73/11 82/25 121/17 125/5 126/5 127/14 133/15 138/19 152/20 155/20 157/20 169/4 176/15 176/20</p>	<p>reasonable [9] 11/3 50/23 54/20 65/15 68/10 68/12 68/17 90/21 178/8</p> <p>reasoning [1] 73/9</p> <p>reasons [4] 74/5 98/17 98/22 175/15</p> <p>reassurance [1] 68/15</p> <p>rebuild [3] 132/19 132/23 133/3</p> <p>recall [87] 7/16 7/21 7/25 8/8 9/16 10/3 10/7 10/19 14/8 15/1 15/24 16/4 16/24 22/17 24/6 27/19 27/21 29/5 31/8 31/11 34/4 35/1 35/2 35/3 35/9 36/9 36/13 38/6 44/12 45/3 45/7 45/8 45/17 45/21 51/6 56/8 56/18 58/3 58/20 64/20 64/22 65/22 67/1 67/10 67/14 67/19 70/14 70/18 82/20 82/25 88/3 96/16 96/18 96/19 96/20 98/1 102/22 102/24 106/9 115/10 115/15 115/18 119/7 126/3 126/13 127/24 133/10 134/6 135/16 135/25 140/9 143/12 144/2 144/19 145/18 150/6 152/7 152/16 158/6 158/21 164/8 166/8 169/10 169/20 171/12 175/2 175/7</p> <p>recalled [1] 164/18</p> <p>receipt [1] 148/8</p> <p>receive [2] 9/18 144/17</p> <p>received [17] 7/11 10/4 11/23 16/3 29/25 51/15 52/11 60/22 61/11 76/22 88/9 102/11 104/7 117/18 134/25 160/11 162/8</p> <p>receives [1] 29/1</p> <p>receiving [4] 10/19 119/21 122/14 178/1</p> <p>recent [1] 136/14</p> <p>recently [3] 38/17 46/12 49/12</p> <p>recipients [4] 24/21 57/15 69/8 125/18</p> <p>recognise [4] 12/13 123/5 123/7 133/6</p> <p>recognised [1] 12/17</p> <p>recollection [6] 35/8 158/4 158/15 161/5 163/16 168/19</p> <p>recommend [2] 142/7 143/8</p>	<p>recommendations [1] 17/12</p> <p>recommended [2] 143/4 143/6</p> <p>record [9] 38/14 38/23 46/10 48/6 74/15 87/21 117/1 137/13 172/4</p> <p>recorded [9] 38/15 38/23 46/11 48/7 88/13 89/24 108/13 126/17 135/9</p> <p>recording [1] 126/25</p> <p>records [4] 69/1 163/18 163/25 164/4</p> <p>recounted [1] 49/14</p> <p>recover [2] 143/22 144/1</p> <p>recovered [1] 149/7</p> <p>recoveries [1] 53/12</p> <p>recovery [8] 26/4 26/10 26/21 27/3 27/8 27/23 28/5 144/13</p> <p>rectify [1] 93/17</p> <p>red [1] 99/11</p> <p>reduce [1] 128/18</p> <p>reduced [1] 51/23</p> <p>redundancy [2] 112/21 163/22</p> <p>refer [10] 10/11 12/1 13/6 14/10 15/6 120/23 125/22 127/8 129/1 158/13</p> <p>reference [38] 3/19 12/8 15/15 23/1 23/16 24/13 25/1 28/13 38/10 41/17 42/23 46/3 49/1 49/20 51/10 52/18 53/16 55/10 57/14 59/12 61/21 68/21 76/13 79/21 83/23 84/3 84/14 89/1 94/2 101/25 116/25 118/14 119/6 126/21 153/12 153/19 172/9 177/22</p> <p>referenced [1] 14/9</p> <p>references [1] 173/13</p> <p>referred [7] 26/1 26/18 29/17 33/5 85/23 141/19 177/18</p> <p>referring [6] 92/15 125/25 127/1 137/8 138/11 172/2</p> <p>refers [2] 12/11 89/3</p> <p>reflect [1] 50/22</p> <p>reflections [2] 97/21 179/3</p> <p>reflective [1] 29/18</p> <p>refresh [1] 101/6</p> <p>refresher [4] 9/8 9/22 10/18 122/14</p> <p>refused [1] 44/2</p>	<p>refute [1] 79/14</p> <p>regard [4] 97/23 131/25 139/2 177/8</p> <p>regarding [3] 4/23 173/4 174/9</p> <p>regardless [3] 21/17 68/8 136/25</p> <p>regards [2] 55/21 128/19</p> <p>regions [1] 114/4</p> <p>regularly [2] 116/6 166/16</p> <p>reinstate [1] 168/12</p> <p>reinstated [1] 168/6</p> <p>reinstatement [1] 169/5</p> <p>relate [2] 1/22 62/4</p> <p>related [2] 6/16 36/2</p> <p>relates [4] 19/17 51/13 59/16 84/15</p> <p>relating [12] 13/20 30/17 41/19 47/24 47/25 49/3 49/18 53/22 72/13 122/21 125/1 140/4</p> <p>relation [14] 12/25 30/12 36/23 79/11 80/15 81/14 85/24 85/25 96/2 100/8 142/25 143/25 148/8 177/23</p> <p>relatively [2] 121/8 122/10</p> <p>relayed [1] 176/4</p> <p>relevance [1] 1/20</p> <p>relevant [17] 1/16 2/8 7/22 22/8 37/15 90/14 90/16 119/16 120/12 130/25 139/18 140/7 140/13 140/17 140/22 140/24 145/10</p> <p>reliability [2] 59/2 59/9</p> <p>relied [1] 45/19</p> <p>rely [1] 31/6</p> <p>relying [4] 45/13 59/3 74/8 79/8</p> <p>remain [5] 4/1 85/12 126/2 166/13 175/6</p> <p>remark [1] 55/20</p> <p>remember [52] 8/2 11/7 11/22 20/4 41/9 44/19 58/19 93/24 103/8 108/17 111/19 114/10 114/22 115/3 115/24 118/11 119/7 119/11 119/21 120/1 122/6 122/14 122/17 124/19 127/3 128/1 128/5 128/8 128/23 132/8 132/22 134/1 134/20 135/3 138/19 139/19 139/22 142/14 144/14 146/14 152/8</p>
---	---	--	--	--

R	179/11	reversals [1] 30/9	113/3 113/6 113/6	59/17
remember... [11]	represented [3]	review [8] 45/9 87/8	113/14 115/20 115/22	save [1] 2/12
154/11 156/2 161/3	43/15 73/1 73/6	87/10 123/15 123/24	117/7 117/8 117/10	saw [4] 98/25 112/22
161/4 165/21 170/2	request [20] 32/25	136/14 172/10 173/25	117/12 117/16 122/4	158/14 171/24
174/18 174/25 175/9	33/2 33/3 34/3 34/23	review/Horizon [2]	122/17 135/1 151/16	say [100] 4/8 5/5 5/19
175/25 178/1	35/11 36/2 36/10 44/2	172/10 173/25	151/24 153/6 161/17	6/6 7/20 8/2 9/5 9/15
remembered [2]	49/21 75/9 87/6 89/6	reviewed [2] 141/12	170/3 171/14	10/22 11/15 16/21
103/7 118/7	131/18 132/1 132/14	178/15	roles [4] 4/4 4/4 4/5	18/3 19/7 20/25 21/21
reminder [1] 28/19	139/17 160/4 160/12	reviews [2] 23/21	111/15	22/3 22/15 28/8 29/24
remit [1] 85/10	173/15	115/25	rolled [2] 111/19	30/15 33/12 33/24
remittances [1]	requested [10] 35/25	right [58] 3/12 3/24	111/23	34/21 35/24 36/17
76/22	43/25 59/4 94/18	4/6 4/12 5/20 6/1 6/7	rolling [1] 94/9	36/20 37/1 38/4 45/15
remmed [2] 88/7	132/2 132/11 132/17	6/19 7/8 7/16 8/14 9/1	rollout [2] 16/4 16/10	45/25 46/18 46/25
88/11	171/20 171/23 172/12	25/10 25/12 38/24	room [5] 102/13	47/7 47/16 48/2 48/21
remotely [1] 124/13	requests [4] 69/16	46/19 47/7 47/17 71/3	102/16 103/5 103/18	54/7 54/20 55/1 55/18
remove [1] 172/24	79/18 131/12 134/2	75/17 82/13 87/12	145/7	56/17 57/10 63/3
renovations [1]	required [6] 33/13	91/25 91/25 94/22	rough [1] 104/3	64/20 65/16 65/21
166/2	45/18 52/21 80/21	94/22 99/6 100/8	round [1] 66/9	67/4 70/10 71/19
rep [2] 72/3 72/17	88/10 128/15	101/2 101/12 106/24	route [1] 18/12	72/20 75/2 77/9 78/1
repay [2] 27/15	requirement [2]	109/11 109/21 111/16	routine [1] 129/7	82/23 84/20 84/25
149/11	172/8 172/23	112/4 112/20 112/20	Royal [18] 5/3 24/18	85/7 87/1 87/23 90/2
repayment [1]	requirements [1]	114/6 114/9 114/24	25/3 25/15 25/19	91/9 92/7 92/10 93/22
168/13	139/21	115/12 115/17 116/1	25/22 26/6 26/13 27/1	94/4 94/11 96/13
repeat [2] 142/15	residential [3] 7/17	118/9 119/19 120/10	27/10 27/25 43/20	97/20 98/1 99/14
159/20	118/4 118/17	120/13 125/1 131/14	44/15 103/13 103/17	102/6 108/16 108/18
repeated [1] 96/25	resolve [1] 112/14	136/9 142/21 146/22	103/24 118/8 173/24	111/11 117/21 119/23
repeatedly [3] 2/7	resources [1] 55/24	150/10 163/10 164/21	rules [2] 13/20 72/4	121/13 123/4 130/25
98/9 98/13	respect [5] 116/8	165/10 179/16 180/2	run [5] 98/3 121/18	133/10 133/18 136/21
replace [2] 113/19	116/17 119/3 145/21	right-handed [1]	131/3 149/13 161/11	140/1 140/25 141/24
175/20	179/3	106/24	running [4] 121/16	142/10 142/17 142/22
replacement [1]	responded [2] 106/1	Rights [1] 13/24	125/16 135/11 146/19	146/18 158/10 162/23
115/23	156/9	ring [2] 94/18 161/22	Ryan [11] 110/4	163/8 166/7 166/15
replied [1] 77/7	response [6] 33/23	ringing [1] 162/20	110/5 110/8 110/9	167/11 168/22 171/13
replies [2] 62/18	34/3 54/14 63/2	rings [1] 105/25	165/5 165/18 168/15	171/18 176/12 178/22
87/16	157/11 157/12	RIPA [1] 119/3	179/8 179/15 179/17	saying [23] 31/23
reply [3] 77/8 87/13	responsibilities [1]	risk [5] 88/4 88/5	181/12	41/15 42/9 42/13
155/16	14/2	178/5 178/10 178/14	S	56/13 57/2 63/13
report [30] 31/23	responsibility [2]	Rita [3] 59/22 101/3	Safe [1] 119/3	63/17 65/3 73/20 79/6
32/17 41/18 49/1 49/9	86/2 128/11	101/16	safety [1] 98/17	85/15 89/21 92/23
49/14 49/23 49/25	responsible [9]	Rita Threlfall [1]	said [46] 2/7 20/20	94/22 99/16 99/24
50/4 50/14 50/22	14/19 34/19 37/21	101/3	31/20 32/1 32/8 41/25	99/24 107/20 117/6
59/12 59/18 79/21	43/23 64/7 96/24	Rob [7] 51/11 75/20	44/23 45/15 47/18	142/6 143/3 169/14
101/10 131/5 138/21	114/3 148/19 171/9	75/22 78/24 81/19	51/2 51/5 53/24 60/15	says [53] 12/22
139/15 141/11 141/18	restructure [1]	83/13 123/13	60/16 60/20 60/24	14/17 20/17 23/8 25/2
141/19 141/25 142/14	113/18	Rob Wilson [4] 75/20	61/2 63/22 64/2 65/2	39/4 39/10 39/12
142/18 142/23 170/4	result [15] 27/16	75/22 78/24 81/19	65/11 84/23 90/24	39/20 39/24 40/14
170/7 170/20 177/7	27/17 30/2 32/6 43/20	Robert [5] 39/1 39/10	92/1 94/6 94/23 96/22	40/17 41/2 43/8 46/22
177/14	44/6 51/20 52/5 52/13	40/12 41/2 115/11	96/23 97/1 99/12	47/3 47/8 57/17 59/21
reported [12] 11/1	53/8 60/21 74/2 84/4	Robert Daily [3]	99/13 99/18 100/10	62/19 78/24 79/20
47/23 64/13 74/1	130/7 149/13	39/10 40/12 41/2	100/13 100/17 105/23	81/20 83/15 91/15
114/19 115/2 129/6	resulted [2] 130/12	robust [11] 65/22	105/24 106/1 106/4	92/2 93/23 94/15
157/4 163/4 166/9	170/21	65/24 66/1 66/18	106/10 108/19 149/10	101/14 102/8 103/14
174/7 175/8	resulting [1] 14/22	66/21 144/12 166/11	154/1 161/14 163/21	104/9 104/21 105/15
reporting [6] 36/1	resume [1] 179/24	166/21 167/9 167/13	165/19	105/16 105/20 107/6
43/7 115/7 115/10	Retail [4] 56/1 112/9	167/17	sales [2] 88/14 113/4	107/23 134/13 136/13
116/17 126/16	112/10 112/14	role [53] 4/5 4/11	same [14] 6/25 14/25	137/18 138/15 153/17
reports [2] 119/10	retained [1] 14/19	4/14 4/18 5/6 5/9 5/19	15/3 18/20 33/15	155/18 160/7 160/10
127/6	retrieve [1] 34/20	6/2 6/6 6/9 6/11 7/4	37/11 58/16 75/7 91/6	168/14 172/7 172/23
represent [1] 95/23	return [2] 2/14	7/5 7/8 7/18 8/21 9/3	91/15 99/4 140/9	174/18 177/3 177/6
representative [4]	144/13	9/14 10/6 15/21 15/21	166/16 170/4	178/4
18/23 60/4 72/12	returned [1] 30/7	15/22 21/19 21/25	Santander [4] 148/21	SB [1] 153/18
136/15	Returns [1] 69/2	24/14 36/22 37/11	148/23 149/15 151/3	scandal [1] 95/25
representatives [1]	reus [1] 22/25	62/23 72/8 111/20	sat [3] 4/21 30/21	scars [1] 106/24
	revealing [1] 14/20	111/22 111/23 112/7		scenario [2] 19/16

S	seconds [2] 91/4 153/17	88/21 89/13 89/17 89/21 157/15 157/17	settled [2] 159/16 160/1	89/9 90/3 90/8 149/11 149/14 149/17 163/15
scenario... [1] 20/19	section [6] 14/14 14/14 142/1 142/24 144/10 158/24	seen [11] 22/13 22/21 23/4 25/25 64/7 90/11 98/21 102/3 123/8 126/3 126/6	seven [1] 115/20	shortcut [1] 162/20
Schedule [1] 79/4	section 3 [1] 144/10	Sefton [11] 111/1 147/12 147/19 148/2 148/12 149/9 149/21 150/2 152/17 153/3 161/7	shadowing [3] 119/19 120/3 120/8	shortfall [14] 19/5 21/15 36/3 38/7 42/16 43/23 56/20 73/18 73/21 74/5 74/12 127/21 132/11 132/15
scheduled [1] 1/23	security [73] 5/8 5/24 5/25 6/7 10/4 10/7 12/24 16/24 17/9 18/2 18/10 20/15 24/18 25/3 25/16 25/22 26/13 27/1 32/25 36/22 37/7 37/20 37/20 38/5 43/4 45/4 66/22 67/8 75/25 110/25 112/22 113/1 113/6 113/10 113/13 113/24 113/25 114/9 114/15 114/18 115/2 115/6 115/10 115/16 116/6 116/17 117/19 117/22 118/8 122/10 122/15 125/3 126/15 127/5 130/13 135/10 135/17 135/22 136/1 136/16 137/19 140/20 143/18 144/4 158/19 164/3 168/1 168/15 172/8 172/18 173/2 173/22 177/1	Sefton's [2] 153/12 153/15	SharePoint [1] 26/13	shortly [1] 125/2
Scott [10] 41/20 66/23 67/7 67/18 166/23 167/2 167/14 170/24 171/20 172/17	see [70] 1/3 2/8 12/10 12/10 23/14 26/21 43/1 53/19 53/20 55/6 69/10 72/1 72/18 75/22 78/10 86/22 87/5 87/6 87/11 87/13 87/15 87/15 89/6 91/8 91/8 91/12 91/13 91/20 93/14 93/15 96/5 99/24 101/13 102/6 105/24 107/18 108/8 110/1 118/15 118/19 123/13 123/18 126/24 132/19 136/9 137/6 137/15 137/23 144/11 153/13 154/16 156/11 156/22 159/11 159/19 160/6 160/19 161/18 161/19 162/13 162/20 163/18 164/9 164/15 165/15 167/25 168/4 170/24 172/14 174/2	send [7] 112/11 124/10 157/9 159/18 161/24 174/16 174/16	shaking [1] 104/9	shortfalls [7] 56/22 61/17 63/11 64/1 64/21 93/4 96/25
scratchcard [3] 87/24 89/8 89/10	seeing [3] 16/11 40/24 68/2	sending [2] 123/15 162/22	shall [1] 165/7	should [29] 3/5 3/11 17/17 19/15 19/16 21/13 22/10 26/15 32/2 32/8 37/17 45/8 57/10 59/1 67/25 73/5 76/23 82/16 91/18 99/14 100/22 102/2 102/6 104/15 110/10 136/14 136/17 155/23 178/10
scratchcards [6] 49/19 50/2 88/4 88/6 89/16 90/7	seek [5] 33/6 35/21 82/16 119/16 176/14	senior [13] 16/25 18/9 37/7 37/20 43/2 66/25 67/11 67/16 67/17 115/2 143/16 143/18 172/18	sharing [1] 29/3	shouldn't [1] 59/1
scratchers [1] 91/17	seem [3] 55/23 63/15 116/21	sense [6] 26/9 27/13 32/16 89/7 92/22 99/22	Sharron [3] 116/22 138/4 138/5	show [5] 34/6 58/15 61/3 76/20 142/13
screen [58] 9/11 12/4 16/1 16/12 16/19 19/5 23/1 24/12 24/25 25/7 26/20 28/12 29/22 33/10 36/24 38/2 38/9 41/16 42/22 46/2 48/25 51/9 52/17 53/16 57/13 59/11 61/20 65/19 68/20 71/16 75/1 75/19 77/8 78/22 80/11 81/17 83/4 84/13 85/3 105/14 116/25 118/15 121/20 123/1 123/12 125/24 126/22 134/9 136/4 139/24 144/3 147/16 154/15 156/11 159/9 167/24 170/14 176/22	seems [7] 40/10	sensible [1] 77/2	she [106] 49/18 50/1 52/5 60/9 60/10 60/11 60/12 60/15 60/16 60/17 60/19 60/20 60/22 60/24 61/2 61/7 61/10 61/11 63/7 63/10 63/13 63/18 63/25 72/2 73/17 73/20 74/20 74/22 74/23 74/24 74/24 76/7 76/9 76/10 76/11 76/14 76/16 77/4 77/12 77/16 77/17 78/3 78/5 79/15 80/7 90/24 92/2 92/16 92/17 92/19 92/21 92/21 93/2 93/2 93/4 93/4 93/6 93/8 93/16 93/23 93/25 94/3 94/6 94/15 94/17 95/3 95/4 95/4 95/5 95/7 95/8 95/11 102/8 102/18 103/3 103/14 104/8 104/9 104/10 104/21 105/15 105/16 105/17 105/17 105/20 107/4 107/7 107/8 107/8 107/19 107/20 108/12 108/20 108/21 108/21 108/23 109/1 109/1 109/3 109/5 150/10 150/13 150/19 151/7 155/5 156/25	showed [5] 33/14 68/1 142/9 143/7 149/7
scroll [9] 24/16 24/22 42/24 84/20 87/13 87/18 121/24 137/5 159/21	see [70] 1/3 2/8 12/10 12/10 23/14 26/21 43/1 53/19 53/20 55/6 69/10 72/1 72/18 75/22 78/10 86/22 87/5 87/6 87/11 87/13 87/15 87/15 89/6 91/8 91/8 91/12 91/13 91/20 93/14 93/15 96/5 99/24 101/13 102/6 105/24 107/18 108/8 110/1 118/15 118/19 123/13 123/18 126/24 132/19 136/9 137/6 137/15 137/23 144/11 153/13 154/16 156/11 156/22 159/11 159/19 160/6 160/19 161/18 161/19 162/13 162/20 163/18 164/9 164/15 165/15 167/25 168/4 170/24 172/14 174/2	sense [6] 26/9 27/13 32/16 89/7 92/22 99/22	she'd [2] 64/12 95/10	showing [4] 24/23 41/5 96/6 161/2
scrolling [5] 53/18 56/1 69/5 97/19 105/19	seeing [3] 16/11 40/24 68/2	sentence [7] 33/12 43/12 44/10 59/6 65/21 78/10 84/12	she's [6] 92/23 107/3 107/4 107/7 107/20 108/13	shown [5] 58/9 66/1 75/12 77/13 79/25
se [1] 31/22	seek [5] 33/6 35/21 82/16 119/16 176/14	sent [27] 10/14 12/14 25/5 25/17 28/1 28/20 28/24 41/18 43/4 54/4 56/7 61/22 68/1 75/25 80/10 80/12 88/23 123/14 123/23 130/4 137/9 156/8 156/16 158/14 159/15 160/3 162/3	shows [4] 76/15 142/10 142/11 143/10	shrinks [1] 113/19
search [1] 96/16	seem [3] 55/23 63/15 116/21	sentence [7] 33/12 43/12 44/10 59/6 65/21 78/10 84/12	shrink [1] 113/19	shutter [2] 105/9 105/10
searches [5] 98/18 151/19 153/3 153/6 164/23	seeing [3] 16/11 40/24 68/2	sentences [1] 177/13	shrink [1] 113/19	shutter [2] 105/9 105/10
searching [1] 118/24	seek [5] 33/6 35/21 82/16 119/16 176/14	separate [3] 28/20 63/17 127/15	shrink [1] 113/19	shutter [2] 105/9 105/10
SEC [1] 11/18	seem [3] 55/23 63/15 116/21	September [9] 38/11 42/6 46/5 81/18 92/11 93/8 146/7 154/18 168/2	shrink [1] 113/19	shutter [2] 105/9 105/10
second [41] 14/16 38/12 42/25 46/4 59/17 61/8 71/24 87/10 90/17 96/13 98/3 98/14 98/16 99/3 100/15 100/21 100/25 108/2 120/7 120/20 121/1 136/14 138/21 138/24 144/24 145/2 145/4 145/13 145/19 146/20 159/21 170/3 170/20 172/10 173/4 173/13 173/25 174/10 174/11 174/21 177/6	seem [3] 55/23 63/15 116/21	September/October [1] 42/6	shrink [1] 113/19	shutter [2] 105/9 105/10
secondary [2] 28/25 29/8	seemed [8] 39/18 48/20 66/23 67/5 67/20 79/11 89/10 133/3	serve [1] 80/23	shrink [1] 113/19	shutter [2] 105/9 105/10

S	37/17 66/10 72/5 72/25 73/6 74/4 108/14 141/22	19/13 19/22 38/6 38/6 56/18 56/18	62/14 64/19 65/20 69/3 70/11 70/13 71/17 72/2 75/2 76/9 77/5 77/12 80/2 80/22 85/2 96/2 96/8 97/19 101/24 102/22 105/13 109/15 110/11 110/15 114/13 115/14 116/4 117/21 119/15 120/23 121/13 122/24 123/2 123/4 123/22 125/21 126/14 128/14 129/5 130/10 132/7 135/7 135/24 139/12 139/24 141/24 142/16 142/20 146/23 150/6 152/1 164/20 166/7 166/15 167/11 175/10 179/19	study [3] 8/11 111/1 171/2 stuff [3] 91/22 92/25 173/8 sub [2] 76/4 76/20 subject [14] 28/15 47/19 47/22 48/6 52/20 55/14 57/16 68/25 121/23 134/12 175/17 176/2 176/14 176/18 submitted [2] 17/1 69/17 subpostmaster [15] 34/24 41/23 42/9 42/15 61/16 99/9 132/10 139/13 143/23 146/2 148/14 148/15 155/25 161/6 168/6 subpostmasters [13] 18/8 18/11 28/5 50/5 56/22 71/1 86/15 87/25 95/24 100/3 107/12 111/25 140/3 subpostmistresses [2] 86/3 107/12 subsequent [1] 97/6 subsequently [6] 58/24 86/16 98/21 146/22 153/2 164/20 substance [1] 48/19 successful [2] 23/13 23/22 such [12] 30/9 44/22 65/12 77/16 79/7 82/6 85/9 88/16 94/3 98/18 105/3 131/15 suchlike [1] 32/15 suffers [1] 104/10 sufficient [3] 31/16 32/4 79/1 suggest [8] 12/20 36/14 48/9 65/10 65/18 74/17 89/13 107/5 suggested [1] 69/14 suggesting [1] 45/8 suggests [1] 58/7 suitable [1] 2/18 sum [1] 149/8 sum' [1] 52/2 summaries [1] 119/10 summary [9] 38/22 41/21 42/3 42/12 48/10 102/21 142/3 142/24 143/14 superstore [1] 104/5 supervise [1] 116/14 supervision [4] 16/18 16/22 115/16 116/6 support [8] 22/14 70/8 70/21 71/5 112/9
Singh [4] 42/24 43/1 43/7 74/1 single [1] 171/2 sir [20] 1/3 1/6 2/20 25/9 25/13 54/12 54/22 55/2 55/6 86/6 95/19 95/21 109/9 109/18 110/1 165/3 165/15 179/10 179/22 180/1 sit [2] 30/19 102/11 site [4] 26/14 103/13 130/19 130/23 sits [1] 86/18 sitting [1] 179/24 situation [1] 162/16 six [5] 5/1 46/6 92/6 92/8 113/12 size [3] 104/2 114/14 129/3 skills [1] 143/17 skillset [1] 113/7 slightly [1] 105/19 slips [2] 149/6 152/12 slow [5] 39/5 39/21 41/15 48/22 162/22 small [1] 121/7 smaller [1] 128/19 SMITH [5] 1/7 1/10 1/13 2/14 181/2 Smith's [2] 2/2 2/5 snapshot [1] 61/2 so [222] so-called [1] 19/21 sold [2] 88/8 88/12 solicit [1] 19/15 solicitor [10] 72/22 72/23 73/1 73/3 73/8 73/12 83/17 105/17 122/4 153/16 solicitors [2] 10/10 121/14 some [42] 2/17 8/11 8/19 8/24 20/15 21/20 21/23 40/8 46/6 47/1 47/20 53/21 59/7 61/5 64/6 66/4 79/14 79/18 80/18 81/13 86/10 87/24 89/21 92/3 95/19 105/8 105/8 111/3 111/15 115/24 116/2 116/3 120/9 123/8 127/18 130/1 157/2 158/17 166/2 166/2 166/4 170/17 somebody [12] 22/17 36/7 42/19 105/6 108/5 113/17 120/20 138/13 150/18 151/18 156/13 159/18 someone [9] 19/18	something [35] 20/4 20/6 20/12 20/17 20/20 21/24 22/19 29/16 31/20 35/20 36/8 42/18 44/23 47/1 51/3 66/1 66/2 66/4 70/17 72/15 73/14 74/24 82/9 87/1 87/10 90/8 96/6 97/3 103/6 113/4 124/10 125/12 126/10 154/25 167/18 sometimes [7] 91/20 127/5 130/23 131/23 141/19 145/5 161/22 somewhere [1] 174/20 soon [1] 6/6 sorry [19] 20/9 25/6 28/8 33/24 63/24 87/2 91/5 92/22 93/3 96/6 96/18 101/1 108/20 108/23 108/24 109/4 113/20 120/6 159/20 sort [27] 4/20 5/3 6/23 6/24 8/5 8/20 8/21 8/23 18/20 21/23 24/9 24/10 31/19 31/22 34/11 36/15 36/19 44/22 47/1 50/3 57/2 57/8 72/18 85/22 89/22 99/21 103/10 sorted [1] 93/19 sorting [7] 94/19 94/20 103/15 103/16 103/17 103/19 103/21 sorts [1] 132/21 sound [1] 165/22 sounds [3] 100/14 107/2 163/4 sourced [1] 115/23 sources [1] 112/9 South [1] 114/6 Southin [1] 118/9 speak [7] 69/20 72/3 72/9 72/12 130/13 150/11 150/13 speaking [4] 48/1 103/9 115/21 161/6 Special [1] 5/2 specialist [1] 177/15 specific [6] 8/25 10/8 16/16 31/20 122/18 135/15 specifically [4] 14/8 106/13 120/2 131/25 specifics [2] 11/7 44/19 speed [1] 161/23 spent [1] 40/23 split [1] 25/20 SPM [8] 18/5 19/10	SPMRs [1] 87/24 spoiled [1] 30/10 spoke [2] 93/25 94/16 spoken [4] 77/15 83/17 161/9 161/12 Spot [1] 87/8 spreadsheet [13] 53/4 53/10 53/15 53/18 54/1 69/24 89/4 170/25 171/7 171/10 171/13 171/19 172/1 staff [11] 6/4 13/4 19/10 19/14 28/6 28/7 28/9 34/25 62/13 130/19 150/22 stage [5] 2/14 77/3 81/13 82/11 178/14 staircase [1] 103/3 stairs [2] 102/12 102/15 stakeholders [3] 28/25 29/9 29/14 stamps [2] 4/24 4/25 stand [2] 113/16 160/22 standard [4] 33/22 34/2 71/23 125/9 Standards [3] 26/1 26/10 26/18 standing [1] 116/12 stands [1] 158/16 Stanway [1] 115/11 start [15] 22/19 30/1 40/25 72/7 77/4 86/23 87/6 87/15 91/3 93/7 120/10 128/20 128/22 153/23 163/11 started [17] 7/12 8/15 9/3 60/17 79/6 92/12 92/13 94/8 120/5 120/6 120/24 121/14 121/16 128/18 128/21 135/19 140/10 starting [7] 3/21 19/19 60/15 62/5 102/6 136/13 147/21 starts [2] 87/5 93/16 state [2] 94/3 136/17 stated [2] 8/4 161/1 statement [98] 3/4 3/6 3/7 3/16 3/20 4/8 5/5 7/20 9/12 10/15 10/18 10/21 11/16 12/6 13/6 15/6 16/2 16/20 16/21 17/25 19/6 23/6 29/23 33/11 35/24 36/25 38/2 38/14 38/16 46/12 51/15 51/23 51/24 52/6 52/8 52/11 56/17 57/4 60/3 60/5 62/7	62/14 64/19 65/20 69/3 70/11 70/13 71/17 72/2 75/2 76/9 77/5 77/12 80/2 80/22 85/2 96/2 96/8 97/19 101/24 102/22 105/13 109/15 110/11 110/15 114/13 115/14 116/4 117/21 119/15 120/23 121/13 122/24 123/2 123/4 123/22 125/21 126/14 128/14 129/5 130/10 132/7 135/7 135/24 139/12 139/24 141/24 142/16 142/20 146/23 150/6 152/1 164/20 166/7 166/15 167/11 175/10 179/19 statements [8] 10/20 19/21 62/10 69/22 80/24 81/1 81/24 122/2 states [3] 72/2 148/10 154/25 stating [1] 60/23 stay [1] 113/2 stayed [1] 6/9 stealing [3] 40/25 42/7 61/10 Stein [1] 102/21 step [6] 35/4 35/7 71/21 113/13 129/15 145/20 Stephen [1] 59/13 stepped [1] 170/2 Steve [15] 55/12 115/11 120/13 120/21 120/25 121/8 146/4 150/7 150/16 150/21 151/12 151/17 151/21 152/23 153/7 still [6] 81/13 104/8 104/24 105/14 111/8 152/19 stock [2] 31/24 88/12 stood [1] 31/22 stopgap [1] 115/22 stopped [1] 121/6 stopping [4] 92/15 95/3 154/6 169/5 stored [1] 124/20 storing [1] 40/22 straighten [1] 155/23 straightforward [1] 54/11 strange [1] 77/21 strategy [1] 107/10 Street [1] 101/17 stress [2] 1/17 27/22 strike [2] 9/25 37/19 striking [1] 103/1 structural [1] 5/10 structure [4] 5/7 18/21 30/20 113/23	

S	109/19 112/21 120/10 120/16 124/2 163/22 taken [16] 30/3 30/23 35/4 35/7 37/6 46/23 47/14 48/14 51/3 70/16 83/20 84/6 84/10 84/10 165/18 174/22 taking [7] 10/20 19/21 104/14 106/11 107/2 107/5 130/7 Talbot [1] 114/24 talk [2] 72/14 119/25 talking [10] 40/3 50/2 56/1 56/11 67/15 73/14 92/18 103/23 106/13 106/13 tape [8] 38/15 38/18 38/23 46/4 46/10 48/7 105/22 119/9 tapes [1] 46/13 targeted [1] 30/3 tasked [3] 9/22 9/24 171/18 tattoos [1] 106/24 TCs [4] 41/25 42/8 42/18 88/1 team [110] 1/10 1/18 4/6 4/22 5/1 7/6 11/23 11/24 11/25 17/2 17/11 17/13 17/18 18/3 18/10 20/15 20/15 21/3 21/8 21/25 22/9 22/12 23/23 30/5 30/18 30/19 33/1 35/13 36/23 37/5 37/8 37/21 38/5 41/18 45/4 45/5 45/12 49/2 50/11 50/17 62/3 62/22 66/22 67/8 67/13 69/15 76/1 78/15 87/3 88/24 110/25 112/22 113/1 113/9 113/13 113/15 113/15 113/20 113/20 113/21 113/24 113/25 114/1 114/12 114/14 114/16 114/19 114/22 115/1 115/5 116/5 116/11 116/13 116/16 117/8 117/12 117/19 117/22 121/7 122/16 125/3 126/8 127/25 128/1 128/2 128/4 128/10 128/19 129/7 135/18 141/12 141/13 141/17 141/17 141/23 142/18 143/20 144/4 144/15 144/16 164/3 166/17 166/24 167/6 168/1 169/1 170/3 170/18 172/19 176/4 Team's [1] 78/23 teams [1] 114/3	technical [3] 16/9 40/8 42/20 techniques [1] 122/3 telephone [2] 39/7 51/16 telephoned [1] 89/5 tell [5] 40/15 91/10 150/17 157/25 173/5 telling [6] 48/12 52/10 74/25 93/6 95/3 170/11 Template [1] 137/19 temporarily [4] 113/13 113/17 115/1 160/13 tend [1] 74/17 tended [1] 171/16 Terminal [2] 88/9 88/11 terms [11] 15/13 15/25 22/11 31/15 31/24 54/11 56/17 63/22 64/2 139/8 143/15 testing [1] 178/6 than [18] 33/14 33/22 34/2 63/10 65/23 75/8 75/11 75/12 93/10 108/5 113/5 114/11 122/18 127/10 147/6 152/21 155/10 178/25 thank [48] 1/5 2/19 2/20 3/3 55/2 55/7 86/9 90/17 95/16 95/18 95/21 96/12 97/20 109/6 109/11 109/14 109/22 110/3 117/20 119/14 122/13 123/10 124/18 135/6 137/11 138/18 141/9 144/7 144/20 154/14 154/15 159/23 160/5 165/3 165/11 165/15 165/17 166/3 169/12 175/3 179/1 179/8 179/13 179/15 179/17 179/21 179/22 180/1 thanks [5] 53/14 54/21 63/5 165/16 170/1 that [866] that I [3] 144/2 156/19 166/24 that's [63] 3/25 4/7 4/13 6/5 6/15 6/20 7/7 25/11 25/12 29/16 34/12 40/21 42/1 47/17 49/7 49/9 50/3 54/20 56/2 58/23 62/16 64/24 70/13 70/13 70/14 70/23 73/7 74/13 75/18 78/17 84/9 89/17 89/21 89/24 90/18	90/25 92/18 92/19 94/5 96/8 96/9 100/5 101/1 107/4 108/21 108/22 109/1 109/4 118/15 127/2 127/8 129/11 138/16 138/22 139/16 140/15 166/3 166/18 167/23 170/11 170/11 170/12 177/23 theft [14] 22/5 74/19 74/22 74/23 78/13 79/3 79/5 81/15 82/22 108/11 137/2 142/12 143/10 174/8 thefts [1] 80/5 their [21] 2/10 17/10 17/19 18/7 18/17 27/16 32/7 66/11 66/15 72/8 72/23 73/10 86/16 103/20 115/24 133/23 148/13 149/11 149/12 149/18 153/8 them [37] 2/9 2/9 19/9 19/22 20/17 20/20 26/17 32/23 41/13 50/14 66/11 67/1 91/18 102/14 107/13 108/6 108/7 116/3 120/19 123/8 123/24 124/5 124/5 124/13 127/6 130/24 140/8 148/5 148/18 150/24 154/11 161/9 161/11 161/11 161/22 175/1 176/13 themselves [2] 26/15 125/19 then [111] 4/25 5/12 8/22 8/24 9/2 14/15 15/15 17/4 18/8 20/20 25/24 28/24 29/12 35/15 40/16 41/3 42/3 44/10 51/1 60/2 60/6 60/9 60/14 60/15 60/16 60/24 61/8 61/13 62/15 63/2 65/10 71/8 77/19 78/1 78/4 88/8 88/10 88/12 88/12 98/22 99/19 100/24 103/11 104/19 105/10 105/13 105/19 106/23 107/21 108/21 109/4 112/22 113/9 113/23 115/1 115/5 117/18 118/17 120/4 120/8 121/13 122/20 123/6 123/11 123/17 124/23 131/25 132/5 133/18 137/2 138/6 140/16 140/23 141/17 141/21 143/22 147/12 147/24 148/18 149/3 149/20 149/24 151/4	151/9 152/11 152/18 152/20 153/2 153/11 155/7 155/18 157/11 157/13 158/7 159/8 160/6 160/24 161/14 161/24 162/13 163/7 164/18 168/3 170/16 171/9 172/3 173/21 174/8 175/14 178/3 179/2 theory [2] 80/1 80/3 there [182] there'd [2] 125/10 161/23 there's [10] 40/21 91/10 92/24 104/19 106/16 117/15 121/25 126/24 137/6 159/12 therefore [4] 50/21 76/21 76/23 82/8 these [17] 5/10 29/2 54/2 60/18 61/5 61/12 67/4 67/4 68/3 69/20 99/10 106/9 126/17 139/20 150/1 157/2 168/11 they [95] 1/19 1/20 2/10 3/18 15/13 18/6 18/13 18/17 19/15 19/16 19/18 19/18 20/9 20/9 20/13 20/14 20/18 20/20 22/13 25/23 28/9 28/9 28/10 32/6 32/8 33/3 36/8 59/9 61/13 71/3 72/7 72/8 73/10 88/8 88/20 97/12 97/13 97/15 102/9 106/3 106/20 110/17 112/11 113/17 113/18 113/19 121/15 121/17 125/4 125/7 125/14 128/20 128/24 130/1 131/5 133/13 133/15 133/24 138/12 139/1 142/8 142/10 144/9 148/4 148/6 148/17 148/19 149/10 149/12 149/14 149/16 149/17 150/16 150/17 154/1 157/23 159/18 159/19 160/2 160/11 160/22 161/25 162/20 163/8 164/12 169/1 170/10 170/11 171/17 173/9 175/17 175/20 176/12 176/17 178/24 they'd [7] 36/8 93/6 124/21 128/22 132/14 149/11 176/18 they're [2] 103/20 105/11 they've [4] 137/10 139/3 157/17 157/21 thief [2] 47/10 80/7
T				
Ta [1] 57/25 tab [1] 89/7 table [1] 76/13 tabs [1] 171/25 tactic [1] 107/10 take [15] 17/17 20/24 21/2 39/16 50/1 54/25 70/4 87/7 106/20				

T	56/9 56/10 59/6 64/7 69/16 81/1 81/5 86/3 86/6 89/18 89/23 97/4 109/9 115/16 119/1 119/11 119/22 124/3 125/5 126/25 127/12 130/5 130/20 131/6 132/5 134/7 137/7 137/9 137/24 138/11 138/12 138/19 143/17 144/7 150/20 153/6 155/2 159/7 161/22 162/18 163/25 164/6 164/7 164/10 167/5 169/1 174/14 174/16 175/4 176/9 179/14	58/22 61/5 63/22 70/19 74/6 80/6 83/25 84/15 86/22 87/11 89/19 90/9 92/3 95/13 98/3 98/24 111/20 112/17 114/3 114/8 117/2 117/16 121/4 122/15 123/21 124/8 128/16 130/19 132/18 135/4 143/17 143/20 146/9 150/9 150/25 154/8 155/6 159/5 159/7 162/19 163/17 164/19 165/7 169/9 170/4 170/6 170/19 173/6 175/16 176/20 177/11 178/24	55/12 63/3 75/23 91/9 93/20 123/17 126/23 136/9 156/8 156/21 159/23 159/24 166/22 167/1 170/16	transferred [2] 103/4 138/13 transfers [1] 32/14 Transit [2] 5/18 6/3 transition [1] 95/13 treat [2] 64/23 104/12 treated [6] 104/15 108/20 108/21 108/23 109/1 109/2 treating [1] 107/23 treatment [1] 102/23 trial [1] 178/10 tried [2] 63/14 149/11 triggered [1] 149/2 trouble [1] 87/25 true [2] 3/16 110/15 try [2] 80/4 161/22 trying [7] 72/13 72/14 85/17 93/17 93/19 100/14 112/13 turn [9] 3/9 10/20 86/8 96/7 101/24 110/12 124/23 166/4 179/10 turned [2] 105/22 105/23 Turning [5] 7/11 16/18 19/3 36/22 146/1 two [29] 2/16 5/21 32/3 40/13 41/3 46/17 49/6 50/5 60/2 78/1 78/5 78/5 78/25 83/6 86/3 86/19 87/19 88/16 116/13 118/8 132/2 132/11 132/19 135/1 144/22 161/12 175/13 176/7 177/13 two months [1] 132/19 two pages [1] 49/6 two paragraphs [4] 60/2 78/1 78/25 87/19 two years [1] 116/13 two-thirds [2] 40/13 46/17 type [5] 17/23 60/9 66/6 131/17 173/1 types [2] 6/25 131/15 typically [1] 145/13
things [12] 4/25 17/15 32/4 40/24 68/3 70/5 100/6 116/10 119/11 119/24 120/1 158/18 think [114] 5/1 5/12 5/21 5/21 6/10 6/23 8/4 9/5 9/7 10/16 12/18 13/13 20/2 20/9 20/14 21/6 21/20 21/21 21/22 25/7 30/21 33/18 33/18 35/15 35/16 35/17 35/18 36/13 36/15 36/18 36/19 36/21 44/16 44/17 44/18 44/22 44/23 45/7 45/15 47/4 47/24 47/25 48/3 48/18 52/7 56/13 58/24 58/25 64/4 64/13 64/24 66/6 66/24 67/10 67/10 67/11 67/16 67/25 68/1 68/2 70/14 71/11 77/2 78/17 78/18 85/16 88/23 90/11 91/16 91/22 92/12 99/20 101/13 104/11 106/19 106/21 109/9 114/10 115/19 116/21 117/5 117/11 120/18 120/22 123/22 125/7 126/5 127/14 128/18 128/20 132/2 138/21 139/1 139/10 140/15 143/13 151/7 151/17 152/10 152/16 152/19 152/22 154/12 155/4 155/5 155/5 156/25 158/14 164/7 166/25 169/14 175/13 179/14 179/23 thinking [3] 15/24 45/2 71/7 third [6] 23/8 60/8 81/19 119/17 159/10 173/23 thirds [2] 40/13 46/17 this [284] Thomas [1] 69/10 Thornycroft [5] 61/23 62/1 62/6 63/2 64/8 Thornycroft's [1] 62/18 those [63] 2/5 10/1 15/13 15/18 15/19 18/14 22/25 25/6 29/19 32/3 53/22 56/5	though [3] 99/14 100/6 138/15 thought [11] 36/8 37/24 71/11 92/16 92/19 97/3 113/7 125/14 140/9 140/12 140/21 thoughts [1] 65/4 three [18] 7/17 7/19 8/1 9/5 30/16 30/25 33/1 33/5 40/1 78/6 87/20 93/10 114/3 114/4 115/6 118/5 136/22 137/6 three-week [1] 8/1 Threalfall [13] 59/20 59/23 101/3 101/11 101/16 101/25 102/7 102/17 105/15 107/6 107/23 108/10 109/12 Threalfall's [1] 107/17 threshold [3] 21/5 21/12 21/16 through [32] 11/5 18/23 24/8 38/18 39/23 46/14 46/15 49/11 49/16 49/19 53/18 62/12 62/15 66/5 100/6 101/10 107/1 119/18 119/24 119/25 120/10 123/15 130/2 132/22 133/5 133/11 133/16 133/19 133/23 161/18 161/19 163/23 throughout [5] 59/24 101/18 117/13 135/14 135/16 throw [1] 39/17 thrown [1] 66/3 time [79] 1/25 2/1 2/4 2/9 2/13 9/16 11/23 13/9 14/5 15/20 24/7 25/21 33/8 35/10 35/18 38/5 39/19 44/19 44/21 45/2 48/18 50/4 50/10 54/8 56/25 57/8 58/18	timeline [1] 163/7 times [5] 10/5 40/5 49/20 85/23 128/25 timescale [1] 166/24 timing [5] 57/22 59/7 71/22 134/17 151/5 tiny [6] 102/16 103/5 103/23 104/8 104/16 104/21 title [6] 6/21 12/11 20/11 26/21 56/3 118/19 today [17] 3/5 4/1 51/16 51/18 56/24 69/12 86/18 102/18 105/3 105/5 107/6 107/8 108/14 110/20 155/19 155/24 156/18 today's [1] 109/13 together [8] 62/7 77/5 121/10 125/8 171/1 171/13 171/16 171/19 told [25] 16/7 33/16 33/17 41/23 52/14 56/14 56/15 60/19 72/7 74/19 102/13 114/18 134/6 139/22 148/18 150/16 152/22 164/17 164/19 167/3 173/16 173/18 175/15 176/2 176/17 tomorrow [4] 1/11 2/6 53/3 179/23 too [4] 40/24 102/19 114/11 173/13 took [18] 6/11 7/18 48/18 60/10 73/25 80/5 81/2 82/1 101/9 101/20 107/4 120/19 135/13 137/14 143/17 146/7 151/17 162/19 tool [1] 39/6 tools [2] 131/8 131/11 top [20] 12/11 23/7 24/19 41/14 43/3	topic [3] 56/11 90/17 159/8 topics [5] 86/19 118/21 119/22 122/1 137/6 total [1] 114/16 touch [4] 57/22 94/1 134/17 144/22 touched [1] 71/14 towards [5] 8/22 11/12 36/19 60/6 62/5 TP [1] 88/25 TP09 [1] 160/13 trading [3] 42/6 76/9 77/12 trail [3] 33/21 34/6 87/5 trained [6] 16/7 19/14 20/14 20/14 45/11 73/4 Trainer [1] 111/17 training [46] 7/11 7/17 8/9 8/25 9/8 9/18 9/19 10/4 10/8 10/11 10/12 10/18 11/6 11/23 15/25 16/3 16/11 16/13 16/16 20/7 111/25 112/2 117/18 118/4 118/7 118/12 118/13 118/17 118/25 119/2 119/22 119/24 120/15 121/15 121/16 121/24 122/6 122/8 122/11 122/14 133/5 137/7 137/21 139/3 139/8 168/8 transaction [22] 29/15 34/7 34/10 34/16 42/1 42/11 57/21 58/9 60/22 60/23 69/1 72/15 78/8 88/2 131/12 131/17 134/16 134/21 157/22 157/24 160/14 160/16 transactional [5] 31/19 31/21 33/19 34/9 75/14 transactions [11] 9/21 16/12 29/13 30/9 32/12 57/24 60/9 76/20 130/2 132/20 134/19 transcript [12] 3/19 38/10 38/17 38/21 46/3 46/13 46/17 90/25 91/5 110/18 146/24 153/11 transcription [1] 38/22	U UCW [1] 18/18 UK [1] 114/4 ultimately [2] 6/24 24/7 um [15] 36/7 39/5 39/6 40/1 40/23 41/1 47/14 91/10 91/17 91/19 92/13 93/1 93/24 94/7 94/16 unable [3] 53/5 155/13 155/14 unaware [2] 65/10

U	25/21 41/5 41/6 43/24 86/25 87/4 87/13 88/5 91/6 91/23 92/14 93/1 94/5 96/7 102/11 102/14 103/3 103/21 105/6 113/7 113/13 136/15 138/3 138/3 142/19 145/7 145/8 146/4 146/21 149/14 161/23 165/24	11/18 31/11 31/13 55/24 75/5 106/25 122/17 vehicle [1] 22/21 verdict [1] 108/13 verdicts [1] 24/3 verify [1] 32/16 versus [2] 59/15 61/25 very [25] 39/5 40/5 41/15 58/13 77/21 87/4 87/7 99/3 99/17 99/23 105/9 105/19 109/14 111/14 117/4 121/7 136/9 144/20 161/10 162/19 162/22 162/22 165/11 168/20 179/17 via [4] 17/2 30/14 46/7 112/8 victims [1] 95/24 view [8] 16/14 16/25 30/11 30/16 65/17 83/25 122/8 178/23 viewed [1] 22/12 viewing [2] 50/25 54/7 viewpoint [1] 56/25 virtually [1] 131/21 visible [1] 3/11 visit [18] 154/17 154/18 154/23 156/2 156/6 157/10 158/9 158/10 158/11 158/21 158/24 159/3 159/10 159/11 161/3 161/4 161/17 163/8 visited [2] 161/8 163/19 visits [1] 154/12 volume [1] 88/1	17/21 21/19 21/24 22/18 23/15 32/9 32/10 32/15 39/21 39/21 40/9 41/13 45/2 48/11 50/19 68/13 73/12 74/25 78/20 81/11 81/14 83/1 88/7 92/19 92/21 93/8 93/11 95/4 98/15 98/25 99/21 99/25 100/1 113/4 128/11 135/2 161/10 162/23 169/13 169/14 175/14 watch [1] 105/23 watching [3] 102/17 107/6 108/14 way [27] 24/10 29/11 32/12 36/21 40/10 40/13 46/17 63/9 66/9 69/21 74/19 97/22 98/2 100/20 102/14 104/12 104/23 107/24 108/20 124/9 125/7 139/16 142/6 143/3 151/14 166/2 179/3 we [254] we'd [8] 48/1 84/22 86/21 87/11 127/5 140/23 174/16 179/6 we'll [3] 57/12 96/11 149/23 we're [4] 40/3 53/19 91/6 99/3 we've [9] 15/7 46/8 48/7 50/7 56/2 64/7 85/13 106/2 172/5 wear [1] 105/23 Wednesday [1] 1/1 week [8] 7/17 8/1 113/12 154/24 155/21 158/15 159/12 160/16 weekend [1] 173/9 weekly [2] 55/25 60/12 weeks [5] 7/19 77/23 78/4 115/20 118/5 weight [1] 178/16 well [30] 11/12 11/24 24/5 28/7 43/5 50/19 54/10 55/1 67/9 70/23 74/23 88/13 88/25 91/16 99/2 99/13 100/20 101/2 104/6 104/21 108/17 120/18 131/3 131/16 132/6 141/7 145/6 157/21 169/8 179/17 went [7] 5/22 24/8 81/25 118/3 133/19 142/18 150/15 were [208] weren't [12] 20/18 39/22 50/10 52/14 56/15 63/23 68/10	88/20 99/15 124/8 139/20 179/7 West [1] 69/19 West Byfleet [1] 69/19 what [158] 4/16 16/22 16/24 17/10 17/22 18/12 20/8 22/5 22/23 29/17 29/17 30/18 31/5 31/24 32/1 32/7 32/22 34/12 35/18 36/6 36/10 39/20 39/20 39/25 40/15 41/6 41/14 42/12 44/24 45/9 45/18 48/23 50/3 51/7 54/12 56/8 56/12 56/17 56/21 57/1 57/8 57/9 58/1 59/6 63/24 64/15 64/25 65/3 65/24 67/13 67/14 68/8 68/12 69/21 70/10 70/13 73/9 73/11 73/17 74/6 74/14 74/20 74/24 75/4 85/15 86/2 87/18 89/12 89/17 89/21 90/24 92/18 92/19 92/22 93/2 96/22 98/1 99/16 99/19 99/24 100/10 100/12 100/17 100/18 104/16 104/17 104/18 105/4 105/12 105/25 106/5 106/11 107/2 107/5 107/18 107/25 112/6 112/25 117/17 119/5 119/7 120/3 122/8 125/5 128/5 128/16 129/9 129/23 131/1 131/8 132/1 138/11 141/1 141/5 142/9 142/25 143/6 143/7 143/14 146/16 150/13 151/16 153/6 156/8 156/9 156/11 157/17 158/13 158/15 158/21 159/3 159/5 160/17 161/20 165/7 165/21 169/10 170/6 170/11 170/12 170/12 170/23 171/22 172/16 172/20 173/3 173/5 173/9 173/16 173/18 174/4 174/18 174/25 176/13 177/10 177/21 178/5 178/23 what's [4] 47/9 129/12 161/15 162/17 whatever [11] 7/1 8/17 20/16 31/14 48/22 51/8 56/11 67/4 72/18 104/5 105/5 wheelchair [2] 102/7 103/2	
unaware... [1] 76/8 uncover [1] 61/2 under [13] 12/22 42/3 56/16 68/9 74/10 82/6 105/15 107/13 130/5 132/5 151/14 169/1 172/12 underneath [3] 55/24 59/21 118/19 understand [33] 2/3 2/9 12/24 15/9 15/20 21/14 34/12 36/1 47/17 54/12 56/5 72/17 74/14 76/2 76/6 76/15 76/25 77/16 81/2 87/9 119/5 125/10 138/24 139/20 146/16 150/13 151/4 153/19 173/14 175/19 176/13 177/21 178/19 understanding [11] 9/19 21/4 30/1 58/1 70/10 88/1 125/5 167/22 167/23 170/6 177/10 understood [9] 11/9 44/22 54/17 58/15 70/15 73/7 139/5 139/16 150/10 undertaking [3] 13/4 120/25 174/23 undertook [1] 170/18 underwent [1] 5/7 unduly [1] 65/5 unexplained [1] 73/21 unfair [1] 150/3 Unfortunately [2] 113/3 163/21 uniformity [1] 125/7 union [6] 18/17 18/18 18/19 18/23 72/6 72/11 unjustifiable [1] 44/4 unless [3] 40/20 141/14 160/22 unlikely [2] 77/3 178/17 unnerve [1] 107/11 unsettle [2] 107/11 107/24 unsure [1] 133/18 until [15] 4/14 6/9 7/4 25/19 25/21 69/15 88/5 112/17 113/17 121/6 128/21 150/15 155/15 178/18 180/4 unused [4] 12/7 13/1 13/21 14/1 up [41] 5/14 6/11 7/18 8/13 17/12 18/9 22/2 24/19 25/19	update [3] 52/21 52/25 177/4 updated [1] 30/12 updates [2] 17/10 53/12 upgrade [1] 155/1 upgrades [2] 60/16 60/18 upheld [1] 57/3 upon [5] 31/6 45/20 84/2 102/9 107/13 upset [1] 102/20 upstairs [1] 102/13 upwards [1] 2/3 Urban [1] 165/22 Urgent [1] 52/20 urgently [1] 52/24 URN [1] 110/18 us [22] 1/4 5/1 5/22 40/21 55/6 55/9 107/8 114/18 129/23 138/22 159/2 165/15 166/19 167/16 170/11 170/23 172/16 173/5 173/12 174/4 176/25 177/16 use [7] 10/9 28/4 111/23 112/1 127/7 135/20 138/22 used [16] 4/24 7/23 8/6 21/11 32/15 33/14 60/12 107/7 126/9 126/15 127/2 127/13 156/25 157/1 157/23 176/16 useful [3] 82/8 122/11 122/12 using [7] 16/12 39/22 53/11 126/17 127/3 127/10 149/11 usual [5] 62/9 78/14 162/7 162/9 167/3 usually [8] 15/3 15/4 30/3 121/18 130/18 145/4 145/18 162/11	via [4] 17/2 30/14 46/7 112/8 victims [1] 95/24 view [8] 16/14 16/25 30/11 30/16 65/17 83/25 122/8 178/23 viewed [1] 22/12 viewing [2] 50/25 54/7 viewpoint [1] 56/25 virtually [1] 131/21 visible [1] 3/11 visit [18] 154/17 154/18 154/23 156/2 156/6 157/10 158/9 158/10 158/11 158/21 158/24 159/3 159/10 159/11 161/3 161/4 161/17 163/8 visited [2] 161/8 163/19 visits [1] 154/12 volume [1] 88/1	vacancies [1] 112/23 vaguely [3] 132/7 146/14 146/14 value [4] 27/15 128/21 129/1 132/3 varied [2] 111/11 131/19 various [9] 4/4 10/5	Walk [1] 9/18 want [16] 1/17 25/11 36/20 46/21 47/11 47/18 47/21 86/19 86/23 87/18 90/22 94/20 95/2 101/2 111/15 166/4 wanted [15] 33/7 89/12 94/19 95/4 95/7 113/2 117/17 125/7 139/1 147/22 150/13 150/17 164/1 170/24 177/4 wanting [1] 48/5 Ward [6] 41/19 43/5 57/15 57/17 58/8 134/10 Ward's [2] 59/15 61/24 was [549] wasn't [42] 8/19	W Weekend [1] 173/9 weekly [2] 55/25 60/12 weeks [5] 7/19 77/23 78/4 115/20 118/5 weight [1] 178/16 well [30] 11/12 11/24 24/5 28/7 43/5 50/19 54/10 55/1 67/9 70/23 74/23 88/13 88/25 91/16 99/2 99/13 100/20 101/2 104/6 104/21 108/17 120/18 131/3 131/16 132/6 141/7 145/6 157/21 169/8 179/17 went [7] 5/22 24/8 81/25 118/3 133/19 142/18 150/15 were [208] weren't [12] 20/18 39/22 50/10 52/14 56/15 63/23 68/10

W	140/12 154/8 164/6	126/5 127/14 133/15	124/13 150/11 154/3	94/24 121/18 144/8
when [100] 1/19 4/17	which [88] 1/15 4/20	138/19 138/24 150/19	156/25 158/17 165/25	146/10
5/5 5/10 5/19 7/4 7/12	5/16 6/11 10/8 10/12	169/19 169/20 173/14	170/21	years [11] 4/3 17/7
7/17 8/15 8/17 9/3	10/13 11/11 12/6 12/9	176/16	workaround [1]	17/16 19/11 40/24
9/17 9/24 10/5 11/9	13/3 15/7 15/8 15/22	wider [1] 29/18	69/14	105/7 111/12 114/14
11/24 12/13 12/18	18/20 20/24 22/22	widow [1] 98/6	worked [5] 3/23 62/2	116/13 117/23 121/19
15/9 16/7 24/6 29/25	24/3 28/24 34/1 34/22	Wilde [1] 156/22	87/24 112/10 132/8	yes [209]
30/7 33/13 33/20 34/6	35/20 36/25 37/21	will [30] 1/22 2/17	working [10] 1/18	yesterday [2] 1/9
34/15 35/21 36/15	38/12 46/4 49/2 50/17	2/24 14/25 47/9 47/10	4/19 9/23 62/22	51/17
39/19 45/13 45/19	51/22 53/5 53/24	53/13 69/14 69/17	103/25 104/2 111/12	you [809]
48/9 50/18 54/3 56/7	55/14 59/13 65/6	69/20 70/4 77/4 80/19	117/13 117/22 123/25	you'd [12] 24/9
60/10 60/20 64/19	67/22 69/16 72/10	81/4 81/5 81/6 82/4	workplace [1] 173/3	106/22 107/1 108/16
70/15 73/19 76/8	75/6 75/25 76/13	82/6 110/20 117/9	Workshop [1] 118/16	117/22 130/24 131/10
77/12 79/6 81/25 82/1	79/25 84/25 86/20	136/17 137/12 144/22	worth [1] 132/12	162/24 163/13 163/18
82/12 82/22 82/23	87/8 88/1 88/7 88/17	155/24 155/25 159/18	worthwhile [1]	164/1 164/17
88/4 88/10 88/11	89/24 90/3 105/13	160/21 160/24 178/15	125/16	you're [23] 24/7
92/13 93/22 94/5 94/7	110/11 110/12 110/23	179/24	would [273]	25/10 31/21 46/19
98/7 99/8 103/9 106/2	118/4 120/20 122/1	Williams [2] 168/11	wouldn't [23] 15/16	63/17 65/2 67/15
106/4 113/6 113/24	122/20 122/24 123/2	169/16	42/17 46/24 51/3	74/13 94/22 96/5
114/18 115/1 115/5	123/19 125/17 125/20	Wilson [12] 51/11	62/13 68/6 84/10	99/16 99/24 99/24
117/19 117/21 119/16	129/20 130/12 131/17	52/15 75/20 75/22	84/10 85/19 85/21	104/13 104/24 108/4
120/5 120/5 122/16	134/2 136/6 137/14	77/7 78/24 80/10 81/9	99/10 99/12 109/2	123/13 124/6 127/1
123/24 124/3 124/6	141/12 141/18 142/3	81/19 81/20 83/2	124/7 126/5 126/12	133/18 137/8 138/15
128/4 129/1 130/4	142/7 142/18 143/4	83/14	133/15 133/21 143/6	172/2
134/24 135/17 138/22	145/17 146/7 147/18	Wilson's [1] 75/25	143/8 151/7 162/23	you've [22] 3/23 23/4
139/12 140/10 140/20	148/4 149/7 149/10	win [1] 9/25	169/2	25/25 33/5 38/16
140/25 150/16 151/13	151/19 152/5 155/25	wish [2] 94/1 179/6	write [2] 19/12 20/21	46/20 67/7 74/15 85/4
156/16 157/19 163/3	160/6 160/10 163/1	withdrawal [1] 78/9	writing [1] 101/16	90/18 94/24 96/21
163/14 164/3 164/11	168/5 179/4	within [17] 4/5 4/9	written [3] 78/17 84/9	100/16 102/3 108/18
167/11 170/2 170/19	while [5] 84/22 91/18	6/13 8/7 10/5 17/18	167/5	111/11 111/12 111/16
171/20 171/22 172/23	92/1 115/23 146/19	29/2 29/18 30/19 45/4	wrong [7] 37/13	114/18 161/14 162/16
176/12	whilst [1] 76/7	64/10 66/22 67/14	40/25 51/4 57/4 57/6	176/6
whenever [2] 27/14	Whitaker [2] 71/25	103/18 105/7 155/16	66/9 74/8	your [161] 3/1 3/14
128/12	118/9	172/21	wrote [1] 94/2	3/17 3/22 4/8 5/5 5/9
where [53] 9/22 17/9	White [1] 43/14	Without [1] 49/16	Y	6/1 6/21 7/5 7/8 7/20
21/14 23/10 23/17	who [54] 1/11 5/22	WITN02360100 [1]		9/3 10/15 10/17 12/6
30/19 30/23 31/23	18/8 20/13 22/9 33/16	102/1	yeah [79] 6/8 6/8	13/6 13/8 13/15 15/6
37/3 45/1 49/17 51/1	34/19 37/5 62/1 66/14	WITN08290100 [3]	6/23 7/3 8/10 8/10	15/22 15/25 16/1
53/1 53/24 54/5 54/18	66/20 67/11 67/12	3/20 9/13 96/8	8/10 8/15 9/7 12/17	17/18 23/2 23/6 23/16
56/24 58/14 59/3	73/4 73/4 78/24 80/8	WITN08950100 [2]	28/8 40/15 62/12	24/9 32/17 33/3 35/8
59/16 64/20 66/1	83/17 83/20 84/7	110/19 123/2	65/12 70/9 70/15	35/24 38/13 38/16
67/23 68/1 70/25 77/1	86/15 86/15 86/17	witness [20] 1/21	70/23 70/24 73/24	39/2 45/23 46/12 49/8
80/6 81/5 81/10 82/5	95/24 98/6 99/5 103/2	62/10 62/14 72/1 77/5	73/24 74/23 82/24	49/23 49/25 50/22
87/5 91/3 96/9 99/19	104/12 106/6 107/6	80/2 80/22 96/8	89/21 89/22 89/22	52/24 56/17 57/4 58/1
103/20 109/17 121/4	108/14 113/21 113/21	101/24 109/14 109/19	90/1 90/1 92/9 93/3	63/2 64/19 68/12 69/3
124/19 130/11 132/10	115/3 116/20 127/22	110/10 118/23 123/2	94/12 94/15 95/1	70/10 70/11 71/12
137/1 142/3 142/24	130/17 130/19 135/11	139/11 139/24 146/23	99/16 100/1 103/17	74/16 78/10 78/19
148/12 152/23 160/23	141/21 143/22 143/23	164/20 166/7 179/19	113/15 114/5 114/7	79/8 84/25 85/2 85/12
161/25 162/16 162/24	146/2 147/13 152/15	witnessed [1] 152/1	114/21 115/8 116/2	85/25 90/14 90/21
164/14 165/19 167/1	155/2 156/24 160/19	witnesses [3] 2/8	116/2 122/11 123/8	96/2 96/3 96/8 97/18
178/7	166/20 167/8 175/22	62/11 118/23	127/11 129/16 130/16	99/12 101/4 101/6
whereabouts [1]	176/2 176/25 177/16	won't [3] 62/24 63/5	130/22 131/14 132/9	105/24 105/25 106/21
52/1	who'd [1] 128/2	147/21	133/21 136/11 137/9	106/22 110/7 110/13
whereas [1] 105/11	whole [1] 171/1	wonder [2] 54/22	137/16 140/19 141/3	110/16 110/24 110/25
whereby [1] 28/23	whom [1] 1/21	165/3	142/21 146/15 147/15	111/4 113/21 114/13
whether [25] 11/1	whose [1] 24/14	word [1] 21/11	151/12 154/22 156/12	115/14 116/4 117/2
12/16 21/17 22/10	why [36] 19/25 24/1	worded [1] 28/1	156/14 157/12 157/21	117/20 119/15 119/17
31/18 33/17 34/19	25/4 25/17 27/22 28/1	wording [2] 22/20	159/24 161/17 163/6	120/13 120/17 120/19
35/21 37/17 43/18	29/8 30/2 36/17 41/2	84/6	164/18 164/22 166/12	120/23 120/25 121/1
43/19 44/13 44/14	47/21 48/8 48/23	words [3] 80/4 97/5	167/14 167/23 171/5	121/13 122/8 122/15
50/18 70/2 70/3	49/25 58/1 76/11	107/7	173/8 174/3 174/5	122/24 123/2 123/4
103/12 111/21 126/13	76/15 77/16 81/2	work [15] 3/4 13/15	174/15 179/6	123/19 123/20 123/22
129/13 131/20 136/25	82/19 83/1 84/9 91/10	16/19 39/18 119/3	year [10] 2/18 4/14	123/23 124/3 124/13
	98/11 117/11 121/15	121/9 124/3 124/9	8/25 40/4 92/13 93/7	125/5 125/21 126/2

Y

your... [53] 126/14
128/11 128/14 129/5
129/7 130/10 132/7
135/7 135/24 137/3
137/23 139/11 139/24
140/11 140/18 141/24
142/16 142/19 144/7
147/6 150/5 151/16
151/23 152/1 153/6
156/7 156/13 158/8
159/1 159/13 159/20
160/8 162/6 163/18
164/4 166/5 166/7
166/13 166/15 166/17
167/11 167/22 170/6
170/16 172/14 172/19
173/10 174/2 175/6
175/10 178/23 179/8
179/19

yourself [4] 87/21
126/7 132/23 154/21

Z

zero [1] 79/25
zip [1] 88/16