

Wednesday 17 April 2024

1
2 (10.00 am)
3 **MR BLAKE:** Good morning, sir, can you see and hear me?
4 **SIR WYN WILLIAMS:** Yes, I can, thank you.
5 **MR BLAKE:** Thank you very much. This morning we're going to
6 hear from Jon Longman. Mr Longman has been given
7 permission to appear remotely today for medical reasons.
8 **SIR WYN WILLIAMS:** Yes.
9 **JONATHAN LONGMAN (sworn)**
10 **Questioned by MR BLAKE**
11 **MR BLAKE:** Can you give your full name, please.
12 **A.** Yes, it's Jonathan Geoffrey(?) Longman.
13 **Q.** Thank you, Mr Longman, you should have in front of
14 a witness statement dated 8 November 2023; is that
15 correct?
16 **A.** I do, yes.
17 **Q.** That should have the Unique Reference Number
18 WITN04670100. Could I ask you, please, to turn to the
19 final substantive page, that's page 47?
20 **A.** Yes, I have that.
21 **Q.** Can you confirm that is your signature?
22 **A.** It is.
23 **Q.** Can you confirm that that statement is true to the best
24 of your knowledge and belief?
25 **A.** It is. I --

1

1 Mrs O'Dell --
2 **A.** Yes.
3 **Q.** -- who did?
4 **A.** As Lead Investigator, yes.
5 **Q.** Thank you. What are the other changes?
6 **A.** They're just dates corrections. In my statement,
7 paragraphs 58 and 64 --
8 **Q.** So that's page 27.
9 **A.** -- it's the date I visited West Byfleet. It's got it --
10 you can see it's 14 August 2008. It should be
11 14 January 2008.
12 **Q.** The further amendment?
13 **A.** Paragraph 76, please.
14 **Q.** That's page 39. I think if, we scroll down, is it
15 paragraph 76, regarding instructions to Mr Jenkins?
16 **A.** Yes, if you can scroll down to the date --
17 **Q.** It's over the page, I think.
18 **A.** -- can you see after "The email chain at FUJ00153371" --
19 **Q.** Yes.
20 **A.** -- "seems to indicate this as it shows Warwick emailing
21 Mr Jenkins on" -- and that should be 7 October 2010.
22 **Q.** Thank you very much. Are those the only changes you'd
23 like to make?
24 **A.** Yes, that's correct.
25 **Q.** Thank you very much, Mr Longman. That statement will

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1 **Q.** I believe there are couple of corrections you'd like to
2 make?
3 **A.** Yes, if I may.
4 **Q.** Absolutely.
5 **A.** The first amendment I would like to make is regarding
6 paragraphs 53 and 54.
7 **Q.** Thank you. Could I just ask for that to be brought up
8 on the screen, WITN04670100. Thank you. Paragraph 54
9 was the first paragraph.
10 **A.** 53 and 54.
11 **Q.** That's page 24. If we could scroll slightly up. Thank
12 you very much. What's the amendment you'd like to make?
13 **A.** Well, having reviewed the documents E37 and E38 in the
14 additional documents bundle, I can see that there was
15 a matter in which I acted as a Lead Investigator and the
16 subpostmaster had attributed losses to issues with the
17 Horizon system during the initial investigation stages.
18 Until receiving the documents, I couldn't recall that,
19 but I'd just like to mention that it was Mrs O'Dell at
20 Great Staughton Post Office.
21 **Q.** Thank you very much, at paragraph 54, you say, "As I've
22 never experienced a situation where a [subpostmaster]
23 attributed a shortfall to problems with the Horizon
24 during the initial investigation stages", and now you
25 can see that you were at least involved in the case of

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1 now go into evidence and will be published on the
2 Inquiry's website.
3 I'd like to start today by asking you a little bit
4 about your background. You worked for the Post Office
5 for approximately 36 years; is that correct?
6 **A.** That is right, yes.
7 **Q.** You started as a counter clerk in a Crown Office?
8 **A.** Yes, correct.
9 **Q.** You moved then to a Head Office in Watford?
10 **A.** That's right.
11 **Q.** You joined the Security Team in 2000 as an Investigator?
12 **A.** That's correct.
13 **Q.** You worked as an Investigator until late 2012/early
14 2013; is that right?
15 **A.** I think it was late 2011 or early 2012.
16 **Q.** Thank you.
17 **A.** I can't remember the exact date that I transferred to
18 a different job.
19 **Q.** The job you transferred to was the Network
20 Transformation team and you worked there until you left
21 in 2016; is that correct?
22 **A.** That's correct.
23 **Q.** Can you assist us with why you left the Post Office?
24 **A.** Well, there was a number of reasons. The job that
25 I was -- well, the job as a Network Transformation

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1 Officer, they were looking for people to take redundancy
2 or to leave, and just personal circumstances also
3 prompted me to decide that was a time to leave, and
4 yeah, they're the reasons.

5 **Q.** Thank you. We have your statement on screen. Can we
6 just look at a few paragraphs in your statement can we
7 start on page 18, please. It's paragraphs 38 to 39.
8 I just want to clarify a few matters in your statement.

9 Am I right to say that it's your evidence that you
10 didn't know what test was applied to those making
11 prosecution and charging decisions? We see that at
12 paragraph 38. I think it's your evidence that you
13 didn't know what test was applied by those making those
14 decisions?

15 **A.** Well, just the general comments that there must be
16 sufficient evidence and I think I've put in my statement
17 a bit further down that it should be in the public
18 interest. They were the only two things that I --

19 **Q.** So you had a vague idea that they considered two things
20 but you didn't know precisely what test they --

21 **A.** Whether they were correct or not. No, I'm not saying it
22 from a position of authority. But, yeah, sufficient
23 evidence and in the public interest were two things that
24 come to mind.

25 **Q.** Could we scroll down, please, to the bottom of page 26.

5

1 the penultimate paragraph of your witness statement.
2 You say at paragraph 97 that, at the time, you didn't
3 believe that you considered a challenge to the Horizon
4 system in one case to be relevant to other cases; is
5 that correct?

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

7 **Q.** That affects things like cross-disclosure between cases;
8 do you understand that?

9 **A.** Um ...

10 **Q.** We'll come on to look at specifics in due course but, at
11 the time, you didn't think that a challenge to the
12 Horizon system in one case was relevant to another case?

13 **A.** If a bug had been discovered, then, obviously, it could
14 be relevant, thinking of the West Byfleet case, a bug at
15 another office had been identified but it was
16 an isolated bug and didn't have any bearing on the West
17 Byfleet case.

18 **Q.** So you say here that you didn't believe that you
19 considered a challenge to the Horizon system in one case
20 to be relevant to another case. So are you saying there
21 that, irrespective of a number of challenges to Horizon,
22 you didn't consider that they would be relevant to
23 a case that you were conducting --

24 **A.** No, I --

25 **Q.** -- subject to that one clarification that you just made?

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1 That's the bottom of paragraph 56. We see there the
2 very final paragraph, it's also your evidence that you
3 weren't aware of any specific rules governing
4 independent expert advice and you can't recall if you
5 were given advice or assisted in that regard; is that
6 correct?

7 **A.** That is correct, yes.

8 **Q.** Moving to page 37, please, paragraph 71. We'll look at
9 this in more detail in due course but, if we scroll down
10 to the bottom of that page, in the middle of that
11 paragraph it says that you would like to point out to
12 the Inquiry you didn't realise at the time -- this is in
13 relation to Seema Misra's case -- that you had the title
14 of Disclosure Officer; is that correct?

15 **A.** That is correct. I dealt with the disclosure but
16 I didn't know I had that official title of Disclosure
17 Officer.

18 **Q.** Could we move on to page 40, please, paragraph 77,
19 halfway through paragraph 77 on page 40. You say there
20 that you are unaware of what the difference would be
21 between an expert or a lay witness; is that correct?

22 **A.** At the time, yes. I seem to -- as the Inquiry's been
23 running, I think I'm picking up some indication of what
24 an expert witness is now.

25 **Q.** Finally, if we move on to page 46, please, paragraph 97,

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1 **A.** Yes, not unless a bug had been found. So, if it was
2 just a challenge but it hadn't been a -- a bug hadn't
3 been discovered, then I wouldn't have thought it was
4 relevant to another case.

5 **Q.** Can we please look at page 42 of your statement,
6 paragraph 86. You say there:

7 "I have reviewed the judgment of the Court of Appeal
8 in [*Hamilton & Others*]. Upon reflection on this case,
9 I do not think that I would have done anything
10 differently."

11 Do you think that you have properly reflected on
12 your actions in respect of the cases that we're going to
13 be looking at?

14 **A.** When I say I don't think I would have done anything
15 differently, I was talking about the initial
16 investigation, the offender report and -- well, up to
17 the offender report and the charging. When it got to
18 court, obviously, there are things that I wish had been
19 done differently.

20 **Q.** Do you think that you would have familiarised yourself
21 a little bit better with relevant tests, relevant
22 responsibilities that you had at the time?

23 **A.** Well, this is referring to the West Byfleet case, isn't
24 it, this --

25 **Q.** I think this is a general statement that you don't think

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1 you would have had done anything differently. Are you
2 saying that's --

3 **A.** Well --

4 **Q.** -- simply in relation to Ms Misra's case?

5 **A.** Yeah, well, with reflection, then, yes, more ARQ would
6 have been obtained, forwarded to Fujitsu. So yes,
7 things would have been done differently.

8 **Q.** Do you think you would have thought a little harder
9 about how much disclosure you give to defendants, for
10 example?

11 **A.** Well, yes. I mean, again, I thought the disclosure
12 I had given in the *Misra* case was correct at the time,
13 but if there are -- if there was a review of that case
14 and I was told I hadn't done this or I hadn't done that
15 then, obviously, I would try and correct that in --
16 going forward.

17 **Q.** But, I mean, you've read the case of *Hamilton*, you've
18 read the Court of Appeal's judgment and, upon
19 reflection, you didn't think you would that have done
20 anything differently. What do you mean by that?

21 **A.** Well, I would have done -- I think I would have been
22 more forceful in making sure that the disclosure
23 requests were all actioned, if I had that authority.
24 And obviously, yeah, there was a lot of -- there was
25 disclosure requests that didn't get actioned, for one

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1 looking at, Mr Longman, confined to your view of the
2 Seema Misra case or is it a general statement about your
3 general approach to all the cases you were involved in?

4 **A.** Well, I think that was reflecting on the Seema Misra
5 case.

6 **SIR WYN WILLIAMS:** I mean, I know it's under the heading
7 "Seema Misra", so to speak. Well, what confused me
8 anyway, paragraph 86 is introduced with the words
9 "I have reviewed the judgment of the Court of Appeal in
10 *Hamilton & Others*", all right? Now, do you mean by that
11 the whole of the judgment or just that part which
12 relates to Seema Misra?

13 **A.** I'd say it's just the part that relates to Seema Misra.

14 **SIR WYN WILLIAMS:** All right.

15 **MR BLAKE:** Moving on to the topic of training, you say at
16 paragraph 41 to 42 of your statement, that you undertook
17 a five-week training course. Are you able to assist us,
18 was that training while you were working or was that
19 separate to your work and just focusing five days a week
20 on training?

21 **A.** That was a course that all new Investigators were sent
22 on. It was a residential course, at Milton Keynes,
23 I think it was and, having applied for the role, I spent
24 some time in an office before the course became
25 available and then I was sent on this residential

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1 reason or another, when they should have been actioned.

2 **Q.** We've spoken about the difference between an expert
3 witness and a lay witness, for example. Do you think
4 you would have brushed up a little more on the
5 difference between the two?

6 **A.** Yes, once it was brought to my attention, if I was aware
7 that I'd done -- that we hadn't treated a witness as
8 an expert witness and only as a lay witness, then, yes,
9 that would have been a learning -- I'd have learnt from
10 that and made sure that, you know, the next case where
11 we needed an expert witness it was done in the correct
12 manner.

13 **Q.** So that sentence there in your witness statement, do you
14 still stand by that sentence or do you think we can
15 scrub that one out?

16 **A.** Well, no, I think I would have done -- the initial
17 investigation was done properly but the -- after it went
18 to trial, there was things that I would have done
19 differently, yes.

20 **Q.** I'm going to move on to the training that you were
21 provided with. The statement can come down, please.

22 You say --

23 **SIR WYN WILLIAMS:** Mr Blake, I'm sorry to be pedantic but
24 I'm not entirely certain, so let me ask the direct
25 question: is your paragraph 86 that we've just been

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1 course, along with other Investigators.

2 **Q.** Do you recall if it was residential for five weeks or
3 was there a period of learning prior to the residential
4 part of the course?

5 **A.** Oh, prior to going on the course, I was in
6 an Investigation Department and I was given a lot of
7 work manuals, different modules to just read, work
8 through, just continually go through, which covered
9 different areas of investigations and the law, while
10 I was waiting for the course to become available.

11 **Q.** Was there any focus during that training on the Horizon
12 system?

13 **A.** No.

14 **Q.** You worked for 12 or 13 years in the Security Team.
15 Were there any refresher courses provided to you during
16 that period?

17 **A.** I think there were half-day courses here or a day course
18 there but I can't be more specific. I can remember
19 going to one of the counter training schools for,
20 I think, half a day but I can't remember any other
21 training.

22 **Q.** So in the 12/13-year period, there was some training
23 here and there but nothing so significant that you can
24 recall it?

25 **A.** No, not like -- no, not a significant period of

12

1 training, no.

2 **Q.** Was part of your training about the role of a Disclosure
3 Officer and what that might involve?

4 **A.** Well, again, I'm sure it was covered at the -- on the
5 residential course. As to how much detail it went into,
6 I can't recall.

7 **Q.** Paragraph 71 of your statement -- and this is in
8 relation to the *Misra* case, you say:

9 "I wouldn't have had any involvement in providing
10 disclosure to the defence team."

11 Were you aware at that time that the Disclosure
12 Officer had a separate and distinct role to the
13 Investigating Officer?

14 **A.** No.

15 **Q.** Were you aware that it was part of the Disclosure
16 Officer's duty to disclose material to an accused?

17 **A.** Yes. What I mean in that statement is that I would
18 complete the disclosure schedules and would send them to
19 our Legal Services Team, who would then send them on to
20 the defence solicitor if requested. What I mean by
21 that, I wouldn't send stuff directly to the defence. It
22 would go through --

23 **Q.** We'll come to disclosure in due course but were you
24 involved in the decision-making process in terms of
25 disclosure or did you see your job principally as

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1 The subject there is "West Byfleet", so this seems
2 to be an email in the context of Ms Misra's case; is
3 that correct?

4 **A.** That is correct, yes.

5 **Q.** Thank you. Were you aware that the Callendar Square bug
6 was a bug that could cause discrepancies in Horizon?

7 **A.** I became aware of it as the case progressed. I think it
8 was responded to in a statement from Mr Jenkins but
9 I had no knowledge about Callendar Square until it was
10 mentioned in this particular case of West Byfleet.

11 **Q.** Were you aware, for example, that it dated back to the
12 year 2000?

13 **A.** I thought it was around 2005/2006, Callendar Square. So
14 no, I didn't know it related back to 2000.

15 **Q.** Who did you discuss Callendar Square with?

16 **A.** Well, moving on with the case, I think Gareth Jenkins
17 dealt with it in a statement but my conversations were
18 with Penny, Penny Thomas, and it was responded to about
19 this bug by a statement from Gareth Jenkins.

20 **Q.** We see there a reference to Anne Chambers. Anne
21 Chambers gave evidence in the *Lee Castleton* case in
22 2006. Had you heard of the *Lee Castleton* case by
23 January 2010?

24 **A.** I don't know. I don't think so but I don't know, is my
25 answer, I'm afraid.

15

1 completing that schedule?

2 **A.** Completing that schedule, listing everything that was
3 unused or if there was any sensitive --

4 **Q.** Thank you. I'm going to move on to the topic of bugs,
5 errors of defects in the Horizon system. I'm going to
6 focus particularly on the *Seema Misra* case. Can we
7 start by looking at FUJ00152897, please. We're going to
8 start on 28 January 2010. If we scroll over the page,
9 please, we have an email from you to Penny Thomas. Do
10 you remember Penny Thomas?

11 **A.** Yes, she was a contact. She was the sort of like
12 doorway into Fujitsu. She would deal with any requests
13 and she also provided ARQ data.

14 **Q.** Did you see her role as administrative or more
15 substantial than that?

16 **A.** Administrative.

17 **Q.** Thank you. You say there:

18 "Penny
19 "My barrister telephoned me yesterday evening and
20 requested that I found out any information that Fujitsu
21 may hold in relation to an office called Callendar
22 Square in Falkirk. Apparently, Anne Chambers, a Systems
23 Specialist employed by Fujitsu was cross-examined and it
24 is said that she had full knowledge of an error in the
25 Horizon system at this Post Office."

14

1 **Q.** Were you aware of any cases challenging the integrity of
2 the Horizon system by January 2010?

3 **A.** My colleague -- from the additional documentation, my
4 colleague who I worked with had a case that was going on
5 by the name of *Hosi* -- I think it's *Hosi* -- and that was
6 potentially a challenge to the Horizon system. I think
7 there were -- there was rumours about other cases where
8 there may be challenges to the Horizon but, no, as far
9 as I was aware, no bugs had been identified. I think
10 this Callendar Square, Falkirk was the first one that
11 I was actually informed that there was bug.

12 **Q.** If we please go to page 1 of this document we can see
13 there a reference to the *Hosi* case. It's an email from
14 Penny Thomas to her colleagues, including Gareth
15 Jenkins, and it says:

16 "Tom/Gareth
17 "We have 2 cases running at the moment where expert
18 witness input is required -- that's Gareth."
19 Then she refers at the bottom to Porters Avenue and
20 that's the *Jerry Hosi* case that you were just talking
21 about.

22 **A.** Yes.

23 **Q.** Did you have involvement in that particular case?

24 **A.** Again, from the additional documents, yes, I was
25 assisting, I think, at the first interview, back in --

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1 I forget, 2006, I think, around that time. So I sat in
 2 on an interview to assist the Lead Investigator.
 3 **Q.** And that Lead Investigator was Lisa Allen?
 4 **A.** That's correct.
 5 **Q.** Yes. Did you speak to Lisa Allen around this time about
 6 similar issues in your two cases, allegations about the
 7 Horizon system?
 8 **A.** Well, obviously, Lisa Allen knew that I had the West
 9 Byfleet case and we would have just dealt with our own
 10 cases, really. I don't think there'd have been much
 11 cross talk about where you were with your case, so to
 12 speak. But, yeah, from this email you can see that
 13 expert witness was probably going to be needed for
 14 Porters Avenue, but you tended just to focus on your own
 15 case and you wouldn't really have time or get into too
 16 much detail with discussing other cases with other
 17 Investigators.
 18 **Q.** Can we look at POL00167138, please. Around a similar
 19 time, a few days later, if we could scroll down to the
 20 bottom, please. We see there 1 February, and that is
 21 an email that's sent to yourself, I think, from Dave
 22 Posnett the Fraud Risk Manager. Was he your manager
 23 or --
 24 **A.** He was my line manager at some stage before moving on
 25 to -- he had other roles within the Investigation

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1 I think it was Computer Weekly, and that sort of alerted
 2 me that there was more challenges to Horizon. I don't
 3 remember The Grocer article but I think there was
 4 a Computer Weekly article that was --
 5 **Q.** That was 2009, the Computer Weekly article.
 6 **A.** Right.
 7 **Q.** It says there:
 8 "I've been assured previously (Dave Smith) ..."
 9 It seems as though that's who we know as Dave X
 10 Smith, the IT Director:
 11 "... that our Criminal Law Team are being kept
 12 updated regarding questions surrounding Horizon
 13 integrity."
 14 Were you aware from conversations with Dave Smith or
 15 from conversations with somebody else that there were
 16 a growing number of cases by this stage?
 17 **A.** Well, I knew there was -- I knew there was -- seemed to
 18 be more challenges to Horizon but I can't, I don't think
 19 I spoke to Dave Smith regarding this. As I say, the
 20 article in Computer Weekly had come out, I think, the
 21 year before and, later, when I helped the Civil
 22 Litigation lawyers, I was -- I started putting
 23 a schedule together, and that's when I became aware
 24 that, you know, other investigators also had potential
 25 challenges to Horizon being mentioned at interview.

19

1 Department.
 2 **Q.** If we scroll down here we can see that at this time,
 3 1 February 2010, he was something called the Fraud Risk
 4 Manager.
 5 **A.** Right.
 6 **Q.** Would that have been your line manager?
 7 **A.** No, no. He'd have been -- he would have been Security
 8 Team Leader, if he was my manager. That's the title
 9 they had when --
 10 **Q.** If we could scroll up slightly, we can see the title of
 11 the email is "Another article from The Grocer re
 12 Horizon", I believe The Grocer is a magazine, a trade
 13 journal. It says:
 14 "This ties in with previous correspondence I've
 15 submitted -- in that Defence teams can and do challenge
 16 Horizon in prosecution cases.
 17 "Jon Longman is the Investigation Manager in this
 18 case."
 19 Do you remember that article in The Grocer?
 20 **A.** No, I don't.
 21 **Q.** Were you aware at this stage that defence teams can and
 22 do challenge Horizon in prosecution cases, other than
 23 the case that you were, at that time, involved in?
 24 **A.** Well, I think, when Mrs Misra's defence team came to
 25 court on the first occasion, they brought an article,

18

1 **Q.** I mean, we'll look at that in due course but I think
 2 that's much later on, that's at least 2011 at the
 3 earliest. As at early 2010, it seems to be brought to
 4 your attention here that there are, it seems, a growing
 5 number of cases challenging Horizon. What did you do
 6 with this information?
 7 **A.** I can't recall.
 8 **Q.** I mean, if we scroll up, please, we can see you sent it
 9 to counsel in the *Seema Misra* case, prosecution counsel
 10 and also Jarnail Singh. You say, "FYI". What was your
 11 understanding of the purpose of that email below?
 12 **A.** Well, if I received the -- if I did receive the article,
 13 which I did, then I thought that the barrister and
 14 solicitor should be just made aware of it to see whether
 15 there should be -- whether it should be disclosed or
 16 what advice, you know, should be fed back to me
 17 regarding it.
 18 **Q.** At this stage, did you have any concerns about the
 19 growing number of cases challenging Horizon?
 20 **A.** No, I -- we were always told Horizon was robust and fit
 21 for purpose. So, no, I didn't.
 22 **Q.** Can we please look at POL00054430. Moving to 11 March
 23 2010, can we look at page 3, please. At the bottom of
 24 page 3 we have an email from you to a number of people.
 25 You say there:

20

1 "Dear All

2 "Following a lengthy hearing yesterday where the
3 defence are claiming abuse of process (because they say
4 not all disclosure has been provided to them) the judge
5 has ruled that the trial will not go ahead next week.
6 He is going to review the arguments made by the defence
7 and will make a ruling on Friday afternoon as to whether
8 you new trial date will be set."

9 If you scroll up, there's an email from you to Mandy
10 Talbot saying:

11 "Carole Cross has asked me to keep you informed in
12 this case."

13 Are you able to assist us with who Carole Cross was?

14 **A.** No, I'm sorry, I can't recall who she was.

15 **Q.** And Mandy Talbot?

16 **A.** I can't remember. I thought she was something to do
17 with Legal.

18 **Q.** Yes, if we scroll up, we can see her sign-off. She's
19 been a witness in this Inquiry. If we scroll up, we can
20 see there a member of the Dispute Resolution Team. I'm
21 going to read the email that she sends to you in
22 response. Can we please just scroll up slightly, she
23 says:

24 "Jon

25 "Thank you for the update. I presume that Rob G

21

1 suspects with a grievance", were you aware who they
2 were?

3 **A.** No, I wasn't.

4 **Q.** Were you aware of a belief within the business that
5 there were a number of usual suspects with a grievance?

6 **A.** No.

7 **Q.** "I contacted the Chairman's Office, the business and
8 Iron Mountain to retrieve everything we had on these
9 cases. As such I cannot understand how a claim of
10 failure to disclose can be sustained."

11 Your response is above that. It's you responding to
12 Mandy Talbot. You say as follows:

13 "Jarnail Singh was present at the hearing so he will
14 no doubt inform Rob of events.

15 "In relation to the disclosure issue, the defence
16 are suggesting that we have not reacted quickly enough
17 to providing them Fujitsu transaction log data and that
18 it was not until February 2010 that an expert from
19 Fujitsu agreed to talk to the defence expert."

20 We'll be looking at that in a bit more detail
21 shortly:

22 "One of the sticking points in all of this was that
23 the defence indicated they needed 5 years of transaction
24 log data, but this would cost the Post Office over
25 £15,000. We asked them to be more precise with what

23

1 Wilson and Jarnail Singh have also been notified. Do
2 you or they have an opinion on the inference which will
3 be drawn if the charge of theft is in effect is
4 withdrawn because of the alleged failure in disclosure?"

5 Just pausing there, what do you understand or what
6 did you understand that to mean? Was there a concern
7 that dropping theft might look bad?

8 **A.** Well, in this case, initially, it was going to be false
9 accounting were going to be the charges, and then theft
10 was added to the charge. I was content to go just with
11 false accounting in this particular case. I thought
12 it's what the evidence suggested and I think the
13 defendant was going to plead to false accounting. But
14 I don't really know what to say in -- I don't think
15 I had an opinion.

16 **Q.** It continues:

17 "The only information which the prosecution
18 barrister showed me was a copy of a magazine page which
19 named a number of the usual suspects in terms of
20 postmasters with a grievance."

21 Did you understand that sentence?

22 **A.** I can't remember The Grocer magazine article in detail,
23 but --

24 **Q.** As you say, that may be the Computer Weekly article, it
25 may be The Grocer article, but "the number of usual

22

1 transactions specifically they were looking for on
2 Horizon and to consider a small period of, say, a couple
3 of months. Communications from this point on seems to
4 have been misinterpreted by both sides."

5 Just stopping there, do you recall cost being
6 an issue with regards to disclosure?

7 **A.** On the transaction log data, I think it was actually
8 three years the defence requested and it was rejected,
9 and then I fed it back to Legal -- to the solicitor
10 dealing with this case and I think he spoke to the
11 barrister about trying to get a smaller period of
12 transaction log data. The data was refused because it
13 would take up a lot of our ARQ requests. We only had so
14 many we could have per month or over the course of the
15 year and, I think, if we needed additional ones then
16 there would be a cost, so ...

17 **Q.** You then go on to say:

18 "As for the inference that may be drawn if a theft
19 charge is 'stayed' I would suggest that you speak
20 directly with Jarnail for his opinion. However, I am
21 sure that the defence solicitor will obviously notify
22 the various publications of this and it may well
23 encourage further challenges as to the integrity of
24 Horizon, something that my colleagues and I are
25 experiencing in a number of other cases."

24

1 So it is clear from that stage that you were aware
 2 that Horizon was being challenged in a number of cases?
 3 **A.** Yes, I think there were challenges but I can't recall
 4 how many challenges, when I sent this email, that I was
 5 aware of.
 6 **Q.** Why was there a concern that more challenges would be
 7 encouraged if a theft charge was stayed?
 8 **A.** Sorry, could you repeat that question, sorry?
 9 **Q.** You seem in your response to have been concerned about
 10 encouraging further challenges. Why is it that dropping
 11 a theft charge or staying a theft charge would encourage
 12 further challenges and why would you be concerned about
 13 that?
 14 **A.** I don't know if that is actually my comment or whether
 15 I've got it from somewhere else --
 16 **Q.** Is this your name at the bottom --
 17 **A.** Yes, I know that, but --
 18 **Q.** Were you concerned about further challenges to the
 19 integrity of Horizon?
 20 **A.** Well, I suppose the answer is yes. If -- really,
 21 I think what I'm saying is that it needed to go up to
 22 the solicitor for his opinion.
 23 **Q.** You didn't hold back on providing your own opinion,
 24 though, did you?
 25 **A.** Well, I have said that -- I just can't remember, writing
 25

1 for the losses and refused to make good the audit
 2 shortage."
 3 If we turn to page 5, the bottom of page 5, please,
 4 you say:
 5 "In my view there is not sufficient evidence to
 6 prove that Mrs O'Dell, her son Daniel, or her husband
 7 have stolen any monies from the Post Office. However,
 8 there are admissions from Mrs O'Dell that she has been
 9 failing to make losses good in the Post Office since the
 10 end of May 2009 and has inflated the Monthly Branch
 11 Trading Accounts to show a balance. Mrs O'Dell was
 12 unable to offer an explanation that made any sense as to
 13 why multiple cash declarations were made in December
 14 2009. Mrs O'Dell is adamant that the losses are as
 15 a result of discrepancies on Horizon but could not
 16 suggest exactly what type of transactions have caused
 17 the errors. Mrs O'Dell has contacted the Post Office
 18 helpline on a number of occasions and informed them of
 19 the accumulating losses and that she is inflating the
 20 cash on hand to cover the losses. Mrs O'Dell said that
 21 she was very disappointed by the lack of assistance she
 22 received. Two weeks before the audit was carried out,
 23 Mrs O'Dell had written to her Contracts Manager, Sue
 24 Muddeman and further expressed her concerns over the
 25 balancing within the Post Office. The fact that she
 27

1 that paragraph, what my thinking was when I wrote that.
 2 Yeah, I'm sorry, I can't really answer that.
 3 **Q.** Just to recap as to where we are by March, by spring
 4 2010, we've seen that you knew about an issue at
 5 Callendar Square branch.
 6 **A.** Yes.
 7 **Q.** You knew about an article in at least The Grocer and
 8 probably Computer Weekly, as well?
 9 **A.** Yes, that's correct.
 10 **Q.** You knew that Dave Smith and the Criminal Law Team's
 11 were aware of questions being raised surrounding Horizon
 12 integrity --
 13 **A.** Mm-hm.
 14 **Q.** -- and you and your colleagues seemed to be experiencing
 15 challenges to the integrity of Horizon?
 16 **A.** Yes, that's right.
 17 **Q.** Can we please look at POL00105147, please. This is not
 18 long after, it's 14 June 2010 and you're dealing with
 19 another case, this is the case of Mrs O'Dell and that's
 20 the case you mentioned I your clarification earlier this
 21 morning.
 22 **A.** Yes.
 23 **Q.** Can we please look at the bottom of page 2. We can see
 24 there at the bottom she says that your report says:
 25 "Throughout the interview, Mrs O'Dell blamed Horizon
 26

1 raised her difficulties with the Post Office Helpline
 2 will in my view provide strong mitigation on her behalf
 3 and may lead to some damning questions as to why
 4 an audit of the post office was deferred for 5 months
 5 after she first raised concerns in early August 2009."
 6 Then you say:
 7 "If charges of false accounting are to be considered
 8 then section 1 of the Fraud Act would seem most
 9 appropriate."
 10 That's 14 June 2010. Can you assist us, you say
 11 that it would provide strong mitigation; I mean, it may
 12 also provide a defence, mightn't it?
 13 **A.** That's correct, yes.
 14 **Q.** It's right to say in your analysis here you couldn't
 15 show that money had actually been stolen from the Post
 16 Office, could you?
 17 **A.** No, no, and she hadn't been provided with transaction
 18 log data either which she had requested, and --
 19 **Q.** She had been reporting, it's clear, to the helpline
 20 problems with the Horizon system?
 21 **A.** That's right.
 22 **Q.** I mean, a question that, in fact, former Lord Justice
 23 Hooper raised in his evidence last week was why would
 24 somebody tell the victim of a crime, so the Post Office
 25 in this case, that they were committing criminality and
 28

1 knowing that they would ultimately be liable for that
2 money? Was that a consideration that went through your
3 head at all?

4 **A.** Yes, it was. I seem to recall that this was a case
5 where I asked "Why is it being sent over to the
6 Investigation Department" because 95 per cent of the
7 investigation had already been carried out by the Retail
8 Line. So the Retail Line -- most of this information in
9 my report I already knew before I went to interview
10 Mrs O'Dell and, yeah, I don't think this should have
11 ever been an investigation case. It's a one -- because
12 I agree with you, if you're ringing up the helpline as
13 she was, and saying that "I'm incurring losses", and all
14 the helpline, I think, was saying was "Well, you've just
15 got to make it good", and she was said, "I wasn't going
16 to make it good because I haven't taken the money", you
17 know, there wasn't much assistance there.

18 But yes, it was the one case that was allocated to
19 me where I think I did speak to a manager or someone and
20 say why has this been passed over to us? I can't be
21 100 per cent sure but I did have reservations with this
22 case.

23 **Q.** That's because there's a real possibility in this case
24 that it might have been a fault with Horizon that was
25 causing the losses?

29

1 **Q.** Would it create problems because it is suggestive of
2 a problem with the Horizon system?

3 **A.** Yes -- well, as I say, it should have been. This, to
4 me, is a clear case where there's nothing else going on.
5 It's -- you know, with some of the other cases, some
6 subpostmasters have said, "I've had losses", but they've
7 also, other things have been going on as well. This one
8 is just out and out -- it's the system. So yeah, it
9 should have been investigated and it would have -- yeah,
10 there's -- it should have been either proven one way or
11 another whether there were faults or bugs with the
12 Horizon system at this office.

13 **Q.** I'll ask that question once more about what this is
14 suggestive of. Does it suggest to you that it may have
15 been a problem with Horizon?

16 **A.** Yes, sorry, yes.

17 **Q.** Can we please look at POL00143570, please. This is the
18 same case, 6 July 2010. This is a memo from Jarnail
19 Singh, copied to you, and he says:

20 "Having read the papers and also having spoken to
21 [you], the evidence gives rise to an offence of
22 fraud/false accounting.

23 "Briefly", and then he summarises the issues.

24 He then says:

25 "It is well documented that Mrs O'Dell had contacted

31

1 **A.** Well, it wasn't tested. Transaction log data had been
2 refused on cost grounds but, looking back on it, yeah,
3 this was a case that should have gone up to -- or should
4 have gone through a process of seeing if there was
5 a fault. Most probably, it should have gone up to
6 Fujitsu for review because I think I've said in my
7 statement that I would consider that Fujitsu would be
8 the ones to be able to identify a problem or a fault
9 more than an Investigator.

10 **Q.** You were still at the investigation stage, though.
11 I mean, it would have been possible to have carried out
12 more of an investigation at this stage. The suggestion
13 here in this paragraph that we've just been looking at
14 is that it's going to be a difficult case because she's
15 has evidence of reporting problems with Horizon. Do you
16 think -- is that fair summary of that paragraph?

17 **A.** Yes, I do. As I say, I was never comfortable with this
18 case.

19 **Q.** Is it because there is a possibility that this may have
20 been because of a problem with Horizon?

21 **A.** Well, we'll never know because it was never tested but
22 the reason that she, Mrs O'Dell, raised it with the
23 Helpdesk on many occasions and told them what she was
24 doing would, obviously, create problems, I think, going
25 forward.

30

1 the Helpline on a number of occasions informing them of
2 the losses and also that she had been inflating the
3 cash-on-hand figure to cover those losses. The
4 defendant had been notifying the helpline of her
5 concerns since August 2009, five months before she was
6 audited in December 2009. I understand that two weeks
7 before the audit she had written to her Contracts
8 Manager ... highlighting her concerns.

9 "The circumstances of the facts will cause
10 difficulties in proving this case and the Business will
11 come under grave criticism which the Defence will
12 exploit as can be seen in recent prosecution cases."

13 Was that a concern that you shared?

14 **A.** Yes, I would say so.

15 **Q.** If we go over the page, please:

16 "I Also understand the losses fall short of the
17 £15,000 threshold and therefore this case will not be
18 recovered by means of confiscation."

19 Were you aware of whether or not a matter can lead
20 to confiscation being a factor that's taken into account
21 as to whether to prosecute?

22 **A.** Well, yes, I think it may have been that I was asked to
23 investigate this case despite my concerns because
24 Mrs O'Dell wasn't paying back the money, maybe to have
25 it -- have an investigation interview. There would have

32

1 been more -- I don't know -- then it could have gone
 2 through a recovery process, if there was a prosecution.
 3 **Q.** Was confiscation, whether money could be confiscated,
 4 whether it was over a particular threshold, relevant to
 5 the decision to whether to prosecute or not?
 6 **A.** No, I don't think so.
 7 **Q.** He then says:
 8 "In the circumstances, my view is that a caution
 9 should be administered in this case."
 10 He sets out there terms of the caution. Were you
 11 aware of whether or not the Post Office had the ability
 12 to issue a caution?
 13 **A.** Yes, I think it was -- I think I was aware.
 14 **Q.** I want to take you back to your witness statement
 15 WITN04670100. Am I right in saying that this case,
 16 therefore, didn't proceed?
 17 **A.** Well, a caution was drawn up and I telephoned Mrs O'Dell
 18 to say I had the caution. She says she wasn't going to
 19 sign it and it was just left on file.
 20 **Q.** So the matter proceeded no further.
 21 **A.** That's correct.
 22 **Q.** If we go back to page 46 of your witness statement,
 23 paragraph 97, it's a paragraph we've looked at already
 24 this morning. 97, paragraph 46, if we scroll down, this
 25 the paragraph where you say:

33

1 should have been at least mentioned to the solicitor or
 2 the barrister in our *Misra* case -- Mrs Misra's case.
 3 **Q.** Looking back at that memo from Jarnail Singh, was the
 4 concern one that the business will come under grave
 5 criticism if it were known about?
 6 **A.** Well, that wasn't my view. Yeah, as an Investigator,
 7 you should be fair and open. I take what you're saying,
 8 this should have been disclosed or mentioned at least
 9 and then advice given from our barrister as to what
 10 should happen in terms of whether it should be
 11 disclosed.
 12 **Q.** Trying to think through the reason for its
 13 non-disclosure, was it simply because you didn't
 14 consider that those matters should be disclosed or was
 15 there a wider concern for the business, as suggested by
 16 Jarnail Singh's memo?
 17 **A.** No, I would say because this hadn't been fully
 18 investigated and a bug had been identified, and that's
 19 the reason it wasn't disclosed.
 20 **Q.** But it wasn't fully investigated, was it --
 21 **A.** Well --
 22 **Q.** -- and nobody looked into whether a bug did or didn't
 23 exist?
 24 **A.** Again, costs come into it, transactional data and --
 25 **Q.** Can you see I problem, though, in where you don't

35

1 "At the time, I did not believe that I considered
 2 a challenge to the Horizon system in one case to be
 3 relevant to other cases."
 4 Looking back at the case that we've been looking at,
 5 the O'Dell case, isn't that a case that would have been
 6 relevant to the case of Seema Misra?
 7 **A.** Looking back at it now, yes. It was another case where
 8 Horizon was being blamed for losses, so yes.
 9 **Q.** It's not just -- I mean, you said earlier today that
 10 where there is a proven error with Horizon, that would
 11 be something you should have disclosed. Where there was
 12 a case that was discontinued because of a concern that
 13 there may have been a problem with Horizon, do you
 14 accept now that that is something that should have been
 15 disclosed in Seema Misra's case?
 16 **A.** Yes, my thinking at the time was only cases where a bug
 17 had been identified needed to be disclosed but I can see
 18 what you're saying now, that, yes, this should have been
 19 mentioned, or presented to the defence so that,
 20 obviously, they could make their own enquiries or
 21 representations about this.
 22 **Q.** It's a similar time period, it was you who was involved
 23 in that case. It must have been in your mind at the
 24 time to some extent, mustn't it?
 25 **A.** Well, yes, I'd say so. It was around the time and it

34

1 continue with the case because there may be a bug but
 2 you don't look into that bug and, therefore, you don't
 3 consider it to be a case that merits disclosing because
 4 you haven't identified that bug?
 5 **A.** Yes, I understand what you're saying and, with
 6 hindsight, that was the case that, as I said earlier
 7 should have gone up to Fujitsu for an investigation.
 8 **Q.** Was a tactical decision taken not to investigate it
 9 further because it might actually show a bug?
 10 **A.** No, I wouldn't say that, no. There was no deliberate
 11 attempt to not -- I think the -- to not investigate it,
 12 I think it was because the transaction log data had been
 13 refused on cost, so, without transaction log data, you
 14 can't investigate, you know, for faults or bugs on
 15 Horizon. That's my understanding.
 16 **Q.** At the time, though, that you wrote that investigation
 17 report, you still could have requested transaction data.
 18 It hadn't been deleted by that time, had it?
 19 **A.** No, I just went by the fact that the costs was
 20 a prohibitive factor, and it wasn't being provided.
 21 I also think I said -- I was asking Mrs O'Dell if there
 22 was a smaller period of time where she could identify
 23 problems, during the interview, so that a smaller and
 24 less costly amount of data could be achieved or
 25 obtained, sorry.

36

1 Q. Do you think putting a burden on a defendant to identify
 2 a smaller period, do you think that is a difficult
 3 burden to put on them?
 4 A. Well, yes, and I think when Horizon was mentioned at
 5 an interview or there's been problems with the system,
 6 as an Investigator, I wasn't really aware of what that
 7 meant, so I always thought was it a certain transaction,
 8 you notice it during this week that you started having
 9 problems? So I didn't know that we're talking about the
 10 whole Horizon system that was possibly having glitches
 11 or faults. I thought it could be certain transactions
 12 that they were putting through or, you know, did it
 13 happen during a certain time period.
 14 Q. Do you recognise now that that is a difficult burden to
 15 put on defendants in criminal proceedings?
 16 A. Well, yes but I'm also trying to say that I wasn't fully
 17 aware of what these faults or potential bugs with
 18 Horizon were.
 19 Q. Can we look at FUJ00122928, please. We're on 15 July
 20 2010. We can see, at the bottom of this, page an email
 21 from yourself and it relates to Gareth Jenkins' witness
 22 statement in Mrs Misra's trial and an issue with ARQ
 23 data. If we turn to page 5, please, we can see
 24 an explanation of what that issue was with ARQ data.
 25 It's an issue that the Inquiry has heard quite a lot

1 "We had a meeting with Penny from Fujitsu today in
 2 respect of a problem that has potentially been in
 3 existence since January."
 4 This is 2 July that he's writing. Were you in that
 5 meeting?
 6 A. No, I don't believe so.
 7 Q. So it's since January, we're now in July, so it's been
 8 happening for about five months or so; is that correct?
 9 A. Sorry, when ...
 10 Q. So he says there it's potentially been in existence
 11 since January and he's writing in July?
 12 A. That's about five/six months, yes.
 13 Q. "It appears that the audit data has a number of
 14 duplicate transactions contained within ... It is
 15 potentially as a result of systems backing and
 16 rechecking itself up towards the close of play as it
 17 appears to affect data from around 16.40 until close."
 18 He says as follows:
 19 "The duplicate transactions have the same
 20 transaction number so can be readily identified, so
 21 there is no danger of mistaking them for fraudulent
 22 duplicate transactions such as POCA [I think that's
 23 Proceeds of Crime Act] duplicate withdrawals.
 24 Unfortunately you may feel this works in favour of the
 25 defence as this may strengthen claims as they question

1 about in Phase 4. We can see there an email from Penny
 2 Thomas, so that's in the bottom of the chain that you
 3 ultimately are involved with, and she describes it as
 4 follows. She says:
 5 "However it has recently been noticed that the HNG-X
 6 [that's Horizon Online] retrieval mechanism does not
 7 remove such duplicates and a quick scan of the ARQs
 8 [audit transaction data] provided to Post Office Limited
 9 since the change to the new system indicates that about
 10 35% of the ARQs might contain some duplicate data.
 11 A PEAK has been raised [that's an error log] to enhance
 12 the extraction tool set and remove such duplicate data
 13 in the future. However, until the fix is developed,
 14 tested and deployed, there is a possibility that data is
 15 duplicated."
 16 If we scroll up, please, we have an email from Mark
 17 Dinsdale, who was the Security Programme Manager. At
 18 this stage was he a member of your team; was he senior
 19 to you; where did he fit into the overall scheme of your
 20 department?
 21 A. He was senior, more senior to me, and I think he worked
 22 in a sort of like an old Casework Team sort of
 23 department.
 24 Q. Thank you. This is his email and he says as follows, he
 25 says:

1 the integrity of Horizon."
 2 We see there another concern about questions being
 3 raised about the integrity of Horizon. We've seen that
 4 in a number of emails so far. So, by this time, the
 5 summer of 2010, was there a general concern within your
 6 department about defendants questioning the integrity of
 7 Horizon?
 8 A. I would say -- well, looking at that email, yes.
 9 Q. He continues and he says:
 10 "The duplication of audited records has not, in any
 11 way, affected actual physical transactions record on any
 12 counter at any outlet. The duplication of records has
 13 occurred during the auditing process when records were
 14 in the process to of being recorded purely for audit
 15 purposes from the correspondence servers to the audit
 16 servers. It should be noted that this duplication of
 17 data in the audit stream has always been happening.
 18 However the Horizon retrieval process automatically
 19 discarded duplicate records before creating the ARQ
 20 spreadsheets, while the current [Horizon Online]
 21 retrieval process for Horizon data does not do so.
 22 "Therefore I'm not sure of the course of action we
 23 should take. My initial response was to CEO that
 24 Fujitsu provide a witness statement to quantify the
 25 above that we could attach to each case (as

1 appropriate), and treat each case where this is not
2 accepted individually."
3 Just looking at that, were you concerned about
4 historic cases? We've seen that you were involved in
5 a number of cases prior to this. Were you concerned
6 about the potential for audit data to have been provided
7 that wasn't accurate?

8 **A.** I can't say that -- well, my dealing with duplication
9 data was sort of limited to West Byfleet but I take your
10 point that it maybe should have been a trigger to sort
11 of look back at other cases to see if there was any
12 duplicated data in those, but it wasn't undertaken, no.

13 **Q.** Can we please look at FUJ00122929.

14 Sorry, actually, if we could just go back the
15 previous one, FUJ00122928. In the first of the emails
16 that I showed you, I just draw these to your attention,
17 you say there on page 1, the bottom of page 1, you say:

18 "Gareth's statement is fine. It explains why the
19 duplicates occurred and most importantly of all it
20 confirms that it has no affect on Horizon's accuracy.
21 I have added an extra paragraph to tie it in with the
22 trial of Seema Misra and can confirm that only ARQ447
23 has any duplications within the disk you produced ..."

24 So it seems as though a statement has been obtained
25 from Gareth Jenkins explaining the duplication issue in

41

1 **Q.** Did you at that stage still believe that what occurred
2 in one case was not necessarily disclosable in another
3 case, with regards to issues with the Horizon?

4 **A.** Well, again, not at the time but I can say that it
5 should have been disclosed, even though this duplicated
6 data didn't cause any discrepancies within Horizon.

7 **Q.** Because potentially it shows that the system itself is
8 prone to errors?

9 **A.** Well, it's prone to errors, albeit maybe my thinking was
10 because it didn't create, or that it didn't create any
11 data integrity issues then, it wasn't going to affect
12 anything.

13 **Q.** It did create data integrity issues: it affected the
14 audit data and resulted in them being duplicated but it
15 seems that a workaround was in place and that, in
16 future, it wouldn't show up.

17 **A.** That's right. But when there was duplicated
18 transactions I think the statement makes it clear that
19 it wouldn't have affected the data, although it was
20 a fault, it didn't actually affect --

21 **Q.** It wouldn't have affected the terminal data; it would
22 have affected only the record of the audit data?

23 **A.** That's right.

24 **Q.** I want to move on to conducting investigations. At
25 paragraph 6 of your witness statement you say that you

43

1 this particular case but, as you just explained, that
2 doesn't necessarily address what happened in previous
3 cases or previous investigations?

4 **A.** No, I think his statement initially addressed duplicated
5 transactions generally. There was a general statement
6 about duplicated --

7 **Q.** Yes.

8 **A.** This additional paragraph was just to make the reader of
9 that statement aware as to which particular ARQ had the
10 duplications in the Seema Misra case.

11 **Q.** If we look at FUJ00122929, that's the witness statement,
12 if we scroll down to the second page, I think we can see
13 the words that you added in are in bold on that second
14 page, if we scroll down.

15 **A.** Yes.

16 **Q.** Are those the words that you added in to that statement?

17 **A.** I can't recall exactly but, because it's in bold,
18 I would say, yes.

19 **Q.** Thank you. Just pausing there and trying to identify
20 where we're at in terms of timing, this is the summer of
21 2010. In addition to Callendar Square and all those
22 other matters that I mentioned previously, by the summer
23 of 2010, you had also been told about an error that
24 occurred that affected auditing data?

25 **A.** Mm-hm, yes.

42

1 were aware of the duty placed on investigators to follow
2 all lines of inquiry; is that correct?

3 **A.** That's correct.

4 **Q.** You were aware that you needed to pursue lines of
5 inquiry that pointed away from the guilt of a suspect;
6 is that correct?

7 **A.** That is correct.

8 **Q.** I want to begin by looking at a statement that you
9 produced in Seema Misra's case. Can we please look at
10 POL00054041, please. Thank you. These redactions are
11 slightly heavy and they should have been removed but
12 we'll try and make the best we can out of it. If I tell
13 you that that was 5 February 2010, that will assist you
14 with the date.

15 Could we scroll down, please. Do you remember
16 preparing this statement and submitting it in Seema
17 Misra's case?

18 **A.** This might have been in relation to the defence expert
19 questioning what knowledge Investigators had about the
20 system, I think.

21 **Q.** I'll take you through it. If we look at that second
22 substantive paragraph, the final sentence, it says:

23 "Also have no IT knowledge as to the workings of
24 Horizon equipment or data transfer."

25 You then, in the next paragraph, say you have had

44

1 minimal training on Horizon.
 2 **A.** That's correct.
 3 **Q.** Then the final sentence on that page and over to the
 4 next page, it says:
 5 "I have never experienced any problems with the
 6 Horizon system other than pressing the wrong icon on the
 7 screen and requiring assistance from a more experienced
 8 clerk to get me back to the correct screen."
 9 Now, I'm not suggesting that that is untruthful
 10 because you've made very clear that you don't really use
 11 the Horizon system, but what was the purpose of that
 12 sentence?
 13 **A.** Well, I was just referring to my personal experience of
 14 when I used Horizon on those very few occasions, that,
 15 you know, it was fairly straightforward to use,
 16 although, on occasions, when I was working on the
 17 counter, I did get into a bit of a pickle, if I can put
 18 it in that way, and needed someone to come and help me
 19 get back onto the right screen.
 20 **Q.** Why would you want say in criminal proceedings that you
 21 have never experienced problems with the Horizon system?
 22 Was it in some way meant to be supportive of the
 23 reliability of the Horizon system?
 24 **A.** Well, I suppose -- it was just saying that, when I used
 25 Horizon, albeit briefly, I never encountered a problem.

45

1 a subpostmaster to raise system problems and, if they
 2 didn't raise system problems, no such problems would be
 3 investigated; is that right?
 4 **A.** Well, that is correct, if a subpostmaster or manager or
 5 whatever at interview did not mention system failures
 6 but explained other reasons for why there was
 7 a deficiency in the cash, then you would write up your
 8 report, and forward it to Legal Services for review ...
 9 **Q.** What if they didn't know? What if they were
 10 experiencing shortfalls but didn't know what caused
 11 them?
 12 **A.** Well, normally, there was a reason given for the
 13 shortfall.
 14 **Q.** Perhaps we can look and see how this worked in practice.
 15 If we look at the interview with Jerry Hosi, that's
 16 FUJ00123110. So that's a case that was proceeding along
 17 the same track as Seema Misra. You've already explained
 18 you weren't the Investigating Officer, that was Lisa
 19 Allen, but you were present at that interview. That
 20 interview took place in November 2006. If we please
 21 turn to page 10, I'm just going to read a little bit of
 22 the transcript. If we could scroll down, please, Lisa
 23 Allen says:
 24 "I believe you when you say you've been inflating
 25 your cash-on-hand figure, to cover up for the losses,

47

1 If I'd used the system and I had encountered a problem,
 2 then I would have -- you know, that would have been
 3 something that I would have mentioned.
 4 **Q.** Did you think at that time that that supported the
 5 reliability of the Horizon system or that it didn't take
 6 matters --
 7 **A.** No, it's just reporting what my experience was. I'm
 8 not -- I wasn't trying to defend Horizon with that
 9 sentence, I'm just saying that that was my experience of
 10 Horizon when I used it, that I hadn't had any issues.
 11 **Q.** If we scroll down and this is the paragraph that I want
 12 to ask you about with regards to investigations, you
 13 say:
 14 "When conducting enquiries at Post Office, if any
 15 interview with a member of staff reveals a system
 16 problem as a possible cause for the loss then this would
 17 be followed up as a matter of course by making the
 18 necessary enquiries with our Financial Department at
 19 Chesterfield in the first instance. If during interview
 20 no mention is made of system failures and other reasons
 21 are given for the cause of loss such as ... thefts then
 22 I would not as an Investigator make [such] enquiries."
 23 So it seems then that this is consistent with the
 24 evidence you have given in your witness statement for
 25 this Inquiry, that the burden is very much on

46

1 but what I don't believe is that the losses are genuine.
 2 I think you have taken the money that belongs to Post
 3 Office Limited."
 4 He says:
 5 "This is what you believe because you see that, that
 6 is the only thing ...
 7 **"Question:** I have no evidence to suggest otherwise.
 8 **"Answer:** No, no, no, what evidence can you ... you
 9 say that you believe that I took the money.
 10 **"Question:** The money has been stolen from the Post
 11 Office.
 12 **"Answer:** Why do you believe that?
 13 **"Question:** Well, where is it, £70,000-odd?"
 14 Then there's discussion about working on the Post
 15 Office Counter, and Mr Hosi says:
 16 "This was my first experience and I didn't take the
 17 money, but the money is lost, what can I do?
 18 She says:
 19 "Well, there's only three people that work in the
 20 post office, isn't there, there's you, your son and your
 21 wife. I can't see how £70,000 can get lost in the
 22 system anyhow.
 23 **"Answer:** Because it's not one day."
 24 She says, "It's not one day?"
 25 **"Answer:** Yeah.

48

1 "Question: Well what evidence have you got for this
2 £70,000 of errors with the system? You've talked about
3 your error notices and transaction corrections but
4 nothing in the region of £70,000. The £70,000 one has
5 already ..."

6 He says:

7 "My dear, I told you and if there us [maybe 'is']
8 something you can check with your data, then please
9 I would ask you to do that because I don't take the
10 money and my wife, my son, no one of us would take of
11 the money. Even if you see they are chasing me [the
12 council for] this thing", and he goes on.

13 Do you accept that it wouldn't have been possible
14 for somebody like Mr Hosi to have said "There is a bug
15 in Horizon, I know that there is a bug, identify a bug
16 that you can investigate". I mean, it's pretty
17 difficult isn't it for somebody who is being interviewed
18 to raise issues with Horizon to the level that you seem
19 to have expected?

20 A. Yeah, I -- you know, from what you've just read, then
21 there should have been an investigation into what he was
22 saying to see if Horizon was at his office causing
23 glitches or problems. I think the hardware was analysed
24 but, again, I agree there should have been some
25 investigation into whether what he was saying about the

49

1 "I believe there to be a loss of around £40,000 in
2 the office. It seems to have been building up over
3 a period of several months. It appears to be in the
4 main safe which is MM stock. To make the stock unit
5 balance I declare cash that wasn't there. How this has
6 accumulated I do not know. I have tried to search the
7 units before but haven't been able to find where the
8 loss could be. I do feel that none of the staff have
9 been involved in the loss."

10 Then, if we go over the page to page 3. She's
11 asked:

12 "What can you tell me about that?"

13 She says:

14 "I really can't tell you anything about that. It
15 seemed to start some time last year in the middle of the
16 year, about July or something."

17 Pausing there, we seem to have a number of
18 interviews where those who are being accused of having
19 stolen from Horizon aren't able to pinpoint exact
20 transactions, exact periods. They know that significant
21 periods of time have passed and losses have developed
22 over that period. Reflecting on that, do you think that
23 it was unrealistic to expect them to provide you with
24 more specificity about when these losses were incurred?

25 A. Yes, I would agree, from my point of view, I always

51

1 Horizon system had any merit.

2 Q. But is that sufficient for your purposes to trigger your
3 investigation into the Horizon system? What are you
4 going to be looking for there?

5 A. Well, I -- well, again, I would be looking at -- if it
6 was me, I'd be asking "Can you remember specific
7 transactions or a time period when you think this
8 started?" But, yeah, transaction data should have been
9 obtained. But I do -- I seem to recall that the
10 computer system was analysed at this branch but, not
11 being my case, I'm not 100 per cent sure. There were
12 some checks carried out but --

13 Q. Let's look at one more which is the interview with Dawn
14 O'Connell and that's at UKGI00015099. I can take this
15 one quite briefly. You, again, are not the main
16 interviewing officer but you are present and do ask some
17 questions in interview. If we scroll down, Ms Allen
18 says:

19 "This morning the Investigation Team received a call
20 to say there was going to be an audit shortage at West
21 End Post Office. The Auditors have gone to the office
22 and you have spoken to the Auditor and said it is going
23 to be about £40,000-odd short."

24 If we go over the page, please. Ms O'Connell says
25 as follows:

50

1 thought that you may -- as a subpostmaster you may be
2 able to identify when the losses started and give some
3 steer on to what sort of data to obtain but, yeah, in
4 these cases you just read out, there's no -- they're not
5 able to give a specific date or transaction. So what
6 we -- or what I would be asking for doesn't always seem
7 possible for a subpostmaster to give me back, you know,
8 a response to when this started.

9 Q. The first was an interview in 2006, this one is
10 an interview in 2008. Knowing what you knew in 2010,
11 we've looked at Callendar Square, we've looked at the
12 ARQ issue, we've looked at the growing number of cases,
13 The Grocer, the Computer Weekly article. Did that make
14 you rethink those cases that you had previously been
15 involved in at all?

16 A. Well, yes. There should have been much more
17 investigation in regards to claims where they've had
18 unexpected losses.

19 Q. Going back to where we started today, about the part of
20 your witness statement that said that you wouldn't have
21 done anything differently, I know it's been your
22 evidence that that related to the *Seema Misra* case only.
23 Looking back at these cases and knowing what you know
24 now, would you have approached them differently?

25 A. Yes, I think I would have applied for transaction log

52

1 data and, really, I think we probably needed a process
2 in place so that it was a consistent approach by all
3 Investigators, so that, if you came up across examples
4 like you've just put up, there was a process to follow.
5 Whether Horizon could cope with all these extra
6 enquiries, I don't know, but that's by the by, that's
7 for -- you know, there should have been a process and
8 a protocol maybe in place earlier for dealing with
9 unexplained losses.

10 **MR BLAKE:** Sir, that might be a convenient moment for us to
11 take our mid-morning break.

12 **SIR WYN WILLIAMS:** Yes.

13 **MR BLAKE:** Could we please come back at 11.45.

14 **SIR WYN WILLIAMS:** Yes, certainly.

15 **MR BLAKE:** Thank you very much.

16 (11.26 am)

(A short break)

18 (11.45 am)

19 **MR BLAKE:** Sir, can you see and hear us?

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

21 **MR BLAKE:** Thank you very much.

22 Mr Longman, I'm going to move on to the issue of
23 disclosure in Seema Misra's case and it's a matter we
24 have touched upon. Could we look at POL00050750. It's
25 the Schedule of Non-Sensitive Unused Material. You

53

1 either provided instructions on whether or not to
2 disclose or at least inputted on the timing that the
3 disclosure was provided, whether or not something was or
4 was not reasonable?

5 **A.** No, I just compiled the schedule. That's how I saw my
6 role, just to list the items on this schedule.

7 **Q.** Can we please look at FUJ00152817. I'm going to start
8 in June 2009, so very early on and, if we scroll down,
9 it's an email from you to Andrew Dunks, and you say:

10 "Let's run with this statement as it is. If the
11 defence wants details of the 107 calls then a further
12 statement will be needed at a later stage."

13 That's a reference to Helpdesk calls?

14 **A.** That's correct.

15 **Q.** It seems from that email that you took the decision that
16 you didn't need to provide the Helpdesk calls to the
17 defence as at June 2009; is that correct?

18 **A.** Yes, that's what the statement says, yes.

19 **Q.** So, insofar as those kinds of things were concerned, you
20 did input as to whether or not it was necessary to
21 provide something to the defence?

22 **A.** That was my view at that time, yes.

23 **Q.** So it wasn't simply a matter of compiling a schedule; it
24 was also providing, certainly with respect to some
25 matters, whether or not something needed to be disclosed

55

1 compiled this list of unused material, didn't you?

2 **A.** Yes, I did.

3 **Q.** If we scroll down we can see your signature, your name:
4 your signature is covered by a restriction order. You
5 can see there that you were, it says, "Signature of
6 officer", and if we look at the very top of the list,
7 sorry. If we scroll up, it says:

8 "The Disclosure Officer believes that the following
9 material which does not form part of the prosecution
10 case is [non-sensitive]."

11 You've very candidly admitted in your evidence that
12 you weren't aware that you were something called the
13 Disclosure Officer. Who did you consider to be
14 responsible for disclosure?

15 **A.** Well, me. But I didn't know I held -- I was actually
16 called the Disclosure Officer.

17 **Q.** You've said that you understood your role to include
18 updating this schedule.

19 **A.** Yes.

20 **Q.** Did you also make decisions as to the reasonableness of
21 the disclosure and the timing of disclosure?

22 **A.** What do you mean by that, sorry?

23 **Q.** Well, we'll come to look at the approach that was taken
24 to disclosure. Do you feel that you were just somebody
25 who compiled a schedule or were you also somebody who

54

1 at a particular time?

2 **A.** That's correct.

3 **Q.** Can we please look at POL00107817. The bottom email is
4 from you to Jarnail Singh, and you say:

5 "At the hearing on 14 July 2009, the defence
6 indicated that they would be seeking the services of
7 a forensic accountant to analyse the Horizon data as
8 Ms Misra is now challenging the accuracy of Horizon.
9 I have tried to order the data for the time Ms Misra was
10 subpostmaster (3 years) but as you can see from the
11 email from Dave Posnett there are a number of issues."

12 Perhaps we can scroll down to those issues. He has
13 said to you as follows:

14 "Due to the size of the ARQ request I cannot
15 authorise Fujitsu to proceed at this stage. This
16 equates to approximately 31 ARQs (1 per month of data).
17 We have an annual allowance of 670 ARQs, so the defence
18 request represents quite a chunk of our quota. Also, we
19 can only Request 60 ARQs per month, so this defence
20 request could be detrimental to other prosecution
21 requests."

22 Just pausing there, did you think that was
23 an appropriate consideration to take into account when
24 deciding whether something should or shouldn't be
25 disclosed to a defendant?

56

1 **A.** Well, with hindsight, I wish all the data requested had
2 been provided but, at the time, when I put the
3 application in, I knew it was going to take up a lot of
4 our requests, so I probably wasn't surprised that it was
5 turned down in the first instance.

6 **Q.** He says:

7 "We have a contract with Fujitsu to acquire ARQs for
8 our prosecution cases, and we pay for these. We do
9 assist where we can and where requests are reasonable in
10 terms of our quota, eg police, other parts of the
11 business, small defence requests, etc."

12 So it seems to distinguish between where requests
13 are needed for the police and where requests are
14 requested by the defence. He says:

15 "For 'lumpy' defence requests, we can obtain a quote
16 from Fujitsu for the work, which will then sit outside
17 our quota. Defence can then 1) pay-up, 2) seek [legal
18 advice] and pay up, 3) cancel the request, or 4) seek
19 authority from the court to insist that the request is
20 carried out."

21 Were you aware that that was the approach that was
22 taken to ARQ requests by defendants that are considered
23 to be "lumpy"?

24 **A.** Well, all the ARQs that I'd got previously were for
25 smaller periods. This is, I think, probably the first

57

1 second paragraph, isn't it, saying police would get the
2 data, other parts of the business and small defence
3 requests would get the data but large defences wouldn't
4 get the data. So that's clearly not really right.

5 **Q.** Did you take it up with Mr Posnett at all?

6 **A.** I didn't. I referred this to Mr Singh, that the
7 requests had been refused.

8 **Q.** Did you have a discussion with Mr Posnett where you took
9 issue with his approach?

10 **A.** No, I just referred it to Mr Singh.

11 **Q.** If we scroll down the page over to page 3, please, we
12 can see that there are three requests. The second there
13 is for transaction data which is the ARQ data, the third
14 is for the Helpdesk logs, and that's a matter that we've
15 seen earlier in that earlier email from 2009 and we'll
16 come on to look at the approach taken to those two
17 things: transaction data and Helpdesk data.

18 Can we start by looking at the Helpdesk logs,
19 POL00052234. If we scroll down, please. It's headed,
20 the subject, "[Witness statement] for West Byfleet HSH
21 calls", so it looks as though this email is about the
22 Helpdesk logs, and Mr Posnett says that it's going to
23 take around six weeks to obtain. Is my reading of that
24 correct?

25 **A.** Yes, it would take about six weeks to obtain.

59

1 ARQ for, you know, a wider period, a longer period. So
2 this was probably my first -- I can't say this was my
3 first time I'd had an ARQ request turned down.

4 I can't -- I'm pretty sure that it may have been my only
5 ARQ request that had been turned down but I'm not
6 positive on that. But, yes, it was because it was such
7 a long period that was requested.

8 **Q.** It goes on to say:

9 "Aside from the costs and our quota, another reason
10 for this approach is because many cases plead guilty at
11 the eleventh hour and/or nothing is found by 'experts'
12 to challenge Fujitsu data -- the usual attempts of
13 muddying the waters."

14 Was this is an email that came by surprise at all?

15 **A.** Not the rejection. You know, when I put it in, maybe
16 I was expecting a response "Maybe could the defence
17 consider maybe only a year's worth of data initially
18 and, if something is found, then further data could be
19 released". But yeah, I suppose the last -- the two
20 paragraphs are a surprise.

21 **Q.** You were surprised or, on reflection, you're now
22 surprised?

23 **A.** No, I am surprised. It's basically saying that, you
24 know, that some people can have -- or some organisations
25 can have the data and some can't. So, sorry, that's the

58

1 **Q.** These were the Helpdesk logs that we saw in that email
2 that you didn't consider it necessary to obtain back in
3 June 2009?

4 **A.** What, the ones that were refused? You're talking about
5 the ARQ data?

6 **Q.** No, so we looked at an email from June 2009 where you
7 said, "Let's run with the statement as is, if the
8 defence do want details of the 107 calls, then a further
9 statement will be needed at that stage". It seems that
10 things had moved on by August and that there is
11 a request for those 107 calls.

12 **A.** That's right, yes, sorry. I'm with you now. Yes. So
13 it's taken six weeks to get that data.

14 **Q.** If we scroll up, you tell Phil Taylor that it's about
15 six weeks for that data. So a witness statement, by
16 this stage, had already been submitted which suggested
17 that the number of calls wasn't actually particularly
18 high; do you recall that? I think it was three to four
19 per month was not seen as high?

20 **A.** Yeah, a review had been undertaken, I think, of that
21 data and, yeah, that the number of calls per week or per
22 month were not deemed excessive or, you know, alarming
23 by Fujitsu.

24 **Q.** But it would still take six weeks to obtain that data or
25 that information?

60

1 A. To get the underlying data, you know, the raw data for
 2 it, yes.

3 Q. Can we look at FUJ00154851, please. A letter is written
 4 to the defence. Dave Posnett emails you to say:
 5 "Jon
 6 "A good letter -- I like it."
 7 If we scroll to page 4, please, we can see the
 8 letter that had been written to the defence. Thank you.
 9 If we scroll down, please, it's a letter, I think, from
 10 Jarnail Singh although -- oh no, it's from Phil Taylor,
 11 if we scroll down, over the page, please, we can see
 12 it's signed off by Phil Taylor, Legal Executive,
 13 Criminal Law Division. If we scroll up, please. Are
 14 you able to assist us with who wrote this letter? Did
 15 you input into it?

16 A. No, I don't think I did. This is from somebody who
 17 worked in the Legal Department, probably somebody more
 18 junior to Mr Singh.

19 Q. I'm just going to read to you a few paragraphs. It
 20 says:
 21 "The data will take some 6-8 weeks to produce.
 22 Additionally your client made 107 calls to the Horizon
 23 Helpdesk during her period of tenure which equates to
 24 roughly 2-3 calls per month. In order to provide the
 25 data Fujitsu will wish to know exactly what is required

61

1 having -- you just read it back to me and I didn't have
 2 any input into this, this was -- this letter was written
 3 by the individual who's obviously signed it, without any
 4 input from me whatsoever.

5 Q. You were the Disclosure Officer in this case, as we've
 6 seen from the schedule. Are you were you concerned at
 7 all? I mean, you did receive this. You've sent it on
 8 to Dave Posnett. Were you concerned at the time about
 9 the tone and the content?

10 A. Well, no, because it came from the Legal Department,
 11 I accepted it, you know, on face value that this is --
 12 this was their view. If they said, "No, we will
 13 retrieve the data", then, obviously, we would have got
 14 the data straight away but, because it's come from the
 15 Legal Department, I didn't question them.

16 Q. So was your view at this stage that you didn't mind
 17 providing disclosure to Seema Misra?

18 A. No, I would provide any disclosure to Seema Misra that
 19 I was asked to.

20 Q. You weren't reluctant in any way to provide disclosure
 21 to Seema Misra?

22 A. No, not at all. I wish that everything had been
 23 provided but, when I had asked for -- when I was given
 24 a list of disclosure or asked to get this or asked to
 25 get that, if there was a barrier to getting that

63

1 and for exactly what period. Please could you also
 2 advise as to why you consider the data relevant. You
 3 will already have the Notice of Additional Evidence from
 4 Andrew Dunks of Fujitsu dealing with the calls to the
 5 Helpdesk.
 6 "The retrieval of data by Fujitsu is not a free
 7 service. It is very expensive and depends on the amount
 8 of that which has to be retrieved which is why you are
 9 requested to be very precise. At that stage a firm
 10 quotation can be obtained and counsel will be asked to
 11 give further advice as to disclosure and payment for
 12 this service. The Post Office will not underwrite the
 13 cost if counsel considers the data irrelevant. You will
 14 of course be aware that the same system operates
 15 throughout the country and was not particular to your
 16 client's sub post office.
 17 "I have set out the matter above quite clearly
 18 because in the past many thousands of pounds have been
 19 spent on obtaining this type of data subsequent to which
 20 a late plea of guilty is tendered which means that the
 21 exercise has been a complete waste of time and money."
 22 Now, that letter is clearly an attempt to dissuade
 23 the defendant from seeking the underlying data; do you
 24 agree with that?

25 A. Well, I agree with that and I have to say that I --

62

1 disclosure, then I'd have to refer it to somebody else
 2 to see -- to take advice.

3 Q. But your personal view was neutral on the subject, was
 4 it?

5 A. No, my role would have been much easier if I'd just been
 6 able to get every disclosure item to the defence. We
 7 wouldn't have had all this toing and froing of -- you
 8 know, and all these legal arguments about disclosure.
 9 I genuinely wished that all the requests that had come
 10 in from defence I'd been able to obtain without question
 11 and provide it. So, you know, I wasn't objecting to any
 12 disclosure being sent to Mrs Misra but, obviously, there
 13 were barriers in terms of costs that were put up by
 14 others as to why this information should be provided.

15 Q. Can we please look at POL00053527. This is an email
 16 from you to Phil Taylor and others, November 2009, and
 17 you say:
 18 "Phil
 19 "She will be lucky to get any of it at this ...
 20 stage. Is she attending at 10.30 tomorrow at West
 21 Byfleet."
 22 That appears to be showing a lack of concern in
 23 respect of disclosure and, contrary to the evidence you
 24 have just given, what do you say about that?

25 A. No, I think it must be some information -- information

64

1 that's due to come from Fujitsu or some other
 2 department, and I'm just really saying that there's no
 3 way we're going to get it by the hearing tomorrow.
 4 I mean, yeah, my phrasing could have been a bit more
 5 professional at the beginning but, no, it's not -- it's
 6 not --
 7 **Q.** I think the trial was 30 November, this was 16 November.
 8 **A.** There must have been a request for some data, I must
 9 have been asked when is this data coming and I'm just
 10 replying quickly saying "At the moment, there's
 11 a hold-up and, you know, they'll be lucky to get it at
 12 this late stage".
 13 **Q.** Was there a deliberate attempt to delay disclosure until
 14 as late as possible in the day before the trial?
 15 **A.** Not on my part, no. As I said to you, all the
 16 disclosure requests that I received I tried to action
 17 and get the data. The transaction log data -- I think
 18 there was some -- when that was refused, the three years
 19 worth of data, it did take a long time for the -- to
 20 come back with what data was acceptable. But that
 21 wasn't my doing. I just referred it -- any rejections
 22 to disclosure being made and there always seemed to be
 23 discussions between our Legal Services and the defence
 24 solicitor as to whether they would accept a smaller
 25 sample.

65

1 where there was going to be proceedings taken for theft
 2 and false accounting but that weren't proceeded with
 3 because of potential issues with Horizon?
 4 **A.** Yeah, sorry, can you just -- this advice has come from?
 5 **Q.** This is a request from the defence in the *Misra* case.
 6 They're seeking information.
 7 **A.** Right.
 8 **Q.** That request for information seems to be very much
 9 a request of the kind of knowledge that you had in
 10 relation to the O'Dell case.
 11 **A.** Right, and this advice would have been sent to?
 12 **Q.** Well, it's a request for disclosure. You were the
 13 Disclosure Officer. Did you see this request for
 14 disclosure? If we scroll up, you can have a look at the
 15 format.
 16 **A.** I don't know if I received it in this format or whether
 17 it was sent to the Legal Department and then a memo sent
 18 regarding this. I can't really comment.
 19 **Q.** Am I right to say that at no point during the *Seema*
 20 *Misra* case did you consider whether you should or
 21 shouldn't disclose information relating to the O'Dell
 22 case?
 23 **A.** No, I didn't consider disclosing that, no.
 24 **Q.** If we scroll down, please, there are a number of other
 25 requests. We won't go through them all. I'll take you

67

1 But I want to make it clear that I never delayed
 2 or -- getting disclosure. Wanted to get the disclosure
 3 as I was asked but --
 4 **Q.** Can we look at POL00054008, please. This is a document
 5 entitled "Third request for disclosure". By this stage
 6 it seems the trial has been adjourned and there has been
 7 an order made by the judge on 1 February 2010, and the
 8 defence have submitted a request for disclosure. If we
 9 look to take some examples, if we scroll down,
 10 "Contract" 2, the request is:
 11 "The Post Office case has always been that the
 12 Horizon system is robust and does not have any problems.
 13 If there are subpostmasters who have had losses on the
 14 Horizon system, but have not been prosecuted for theft
 15 and false accounting, this would tend to suggest
 16 an acceptance by the Post Office that problems can
 17 exist, a situation which is borne out by the immediate
 18 recognition of Callendar Place [I think that's meant to
 19 be Callendar Square], Falkirk by a Fujitsu analyst as
 20 referred to in paragraph 23 of the *Castleton* judgment.
 21 This information would, therefore, potentially undermine
 22 the prosecution case and/or assist the defence case.
 23 Please comply with the request."
 24 Now, isn't that exactly a request for the kind of
 25 information that we saw in the O'Dell case, somebody

66

1 through this relatively quickly. Over the page, please,
 2 paragraph 6, we see that that's, 6(a), still requesting
 3 the Helpdesk logs.
 4 If we scroll down to 7, please. There's a reference
 5 there to EPOSS transactions that can get lost. That's
 6 something that the Inquiry has heard quite a lot about
 7 in Phase 2.
 8 **A.** Right.
 9 **Q.** If we scroll down, please, to 8, that's just a repeat of
 10 the request regarding information about other cases.
 11 Paragraphs 9 and 10, there's a request for a witness
 12 statement and that's one that we've seen -- your witness
 13 statement that we see later.
 14 Then, at 10:
 15 "We repeat the second half of this request. Given
 16 the Investigator's lack of understanding of the system
 17 and his reliance on counter clerks who, by your own
 18 view, can be of questionable quality, what back-up teams
 19 does the Post Office have to ensure that all reasonable
 20 explanations are considered before a criminal
 21 investigation is commenced?"
 22 What they seem to be questioning there is, given
 23 your own evidence that you weren't very familiar with
 24 the Horizon system, how can it be that the Post Office
 25 ensures that all reasonable explanations are considered?

68

1 Do you think that there was an issue there, at the Post
 2 Office, with having somebody who was in charge of
 3 pursuing reasonable lines of inquiry but who didn't have
 4 a significant knowledge of the Horizon system?
 5 **A.** Well, yes, I mean, the onus was then on the Investigator
 6 to find the people who could explain how the system
 7 worked, hence, I think in the *Seema Misra* case, we had
 8 to get a statement from a Mr Bayfield to outline some of
 9 the Post Office procedures. But, yeah, it was -- when
 10 putting a case together, if there were questions about
 11 Post Office procedures that I couldn't answer, yeah, it
 12 was a task to find someone who could provide a statement
 13 to that effect, and --
 14 **Q.** If we scroll down to number 11, this is a repeated
 15 request for the transaction data. Do you see that
 16 there?
 17 **A.** Which paragraph is it?
 18 **Q.** 11(a).
 19 **A.** Yeah, can I just -- was this not responded to by Legal
 20 Services and some of it rejected or --
 21 **Q.** Absolutely. We will come to that but the question
 22 really for you is -- and we're now in 2010, February
 23 2010 -- the impression that you get from the documents
 24 might be that Seema Misra really needed to fight for
 25 disclosure, particularly in relation to those logs, the

69

1 He is there providing Gareth Jenkins' witness statement,
 2 and he says as follows in the bottom paragraph that we
 3 see there. He says:
 4 "One concern is that [the Post Office] have not
 5 apparently requested transaction data for West Byfleet
 6 for the period and transactions in question. This would
 7 normally be provided in previous cases and would include
 8 Fujitsu extracting log files from the system to enable
 9 us to provide details of transactions. Surprisingly
 10 this has not been requested in this case. Perhaps you
 11 would consider the need for this."
 12 So you have there Fujitsu themselves questioning why
 13 transaction data hasn't been obtained; do you recall
 14 that at all?
 15 **A.** Well, I do. I mean, what was the date of this email?
 16 **Q.** If we scroll up we can see 5 February 2010, so quite
 17 late on, really. We've looked at emails from 2009, we
 18 see November 2009 there was meant to be a trial, the
 19 trial was postponed, we then have the defence request
 20 for disclosure and you have there, in February 2010,
 21 Fujitsu raising a concern that the transaction data
 22 hadn't been obtained.
 23 **A.** Well, I think in August '08, or was it '09, that the
 24 initial transaction log data for three years was
 25 requested. I fully accept that transaction log data

71

1 Helpdesk logs and the transaction logs; is that
 2 something you agree with or disagree with?
 3 **A.** I'd have to agree with it, yes.
 4 **Q.** Can you assist us with why that might be?
 5 **A.** Well, some of it was costs, as we've -- the transaction
 6 log data. As for the rest, why it wasn't provided, that
 7 wasn't my decision. You know, if it -- if this request
 8 had gone thorough to Legal Services and then it said,
 9 "Please obtain all this as soon as possible", and I'd
 10 received that, then I would have got all this data
 11 together. Again, if I came up against any other
 12 department not providing the data within Post Office,
 13 I'd have had to refer it back for advice but, what I'm
 14 trying to say is, if I was asked to get this data, I'd
 15 have made every effort to get this data.
 16 **Q.** Is there any point at which you think "Well, I'm the
 17 Disclosure Officer, I'm the Investigator, as well,
 18 I think that it's only fair to obtain this data
 19 irrespective of cost"?
 20 **A.** I agree. Costs shouldn't have come into it.
 21 **Q.** Can we please look at POL00029369, please, page 3.
 22 We'll see shortly that you are on this email chain
 23 eventually, you're not on this particular email but it's
 24 an email to Jarnail Singh from David Jones, who is the
 25 Head of Legal, UK Private Sector Division at Fujitsu.

70

1 should have been provided to both experts for analysis,
 2 but the data was refused for three years, the amount of
 3 that was refused and it went back to Legal Services and
 4 then, for some reason, it's taken a ridiculously long
 5 period of time before -- I don't know how the agreement
 6 was made that only a year's data would be given but, you
 7 know, data should have been provided and I can't explain
 8 why it took so long to just finally supply a year's
 9 amount of data. That was -- that had been referred to
 10 Legal Services, so I can't tell you why it took that
 11 amount of time.
 12 **Q.** If we could scroll up, this chain addresses a number of
 13 other issues, requests for disclosure or requests for
 14 explanation. If we go to page 1, we see at page 1
 15 an email from Warwick Tatford to Jarnail Singh, and he
 16 says:
 17 "Dear Jarnail,
 18 "Jon Longman sets out in his email below the extra
 19 matters that I asked Mr Jenkins to look at."
 20 They relate to the Callendar Square issue and also
 21 whether there were any known problems with the Horizon
 22 system. He says as follows, he says:
 23 "The areas where Mr Jenkins says 'for POL to
 24 respond' should be deleted from the statement. These
 25 areas will only lead to a flood of further disclosure

72

1 requests and I am afraid that POL will never respond."

2 Are you able to assist us with that? I mean, how
3 did you understand Mr Tatford's approach to disclosure
4 to be? Were you content with the advice he gave in
5 respect of disclosure?

6 **A.** Are you referring to that second paragraph or --

7 **Q.** The second paragraph and also your general reflections?

8 **A.** Well, my understanding of the second paragraph is that
9 Mr Jenkins did do a draft statement and, on certain
10 points, he said that it was for POL to respond and we
11 did find somebody within POL to respond and provide
12 a statement.

13 **Q.** But the reference there to a "flood of further
14 disclosure requests", was the general atmosphere by
15 February 2010 that there were too many disclosure
16 requests coming from Ms Misra's team?

17 **A.** Yes, I'd say so. Again, it wasn't my view, but --

18 **Q.** Whose view was it, to the best of your recollection?

19 **A.** Well, I have to say it's Mr Tatford's, if he's written
20 that.

21 **Q.** How about Mr Singh, were you aware of his views on the
22 matter?

23 **A.** Well, Mr Singh would deal with -- I recall that when
24 there was a lengthy amount of disclosure requested by
25 the defence, he made mention that we wouldn't provide it

73

1 requesting what they wanted and actually getting some of
2 the items or not getting the full information but
3 I stress it wasn't my -- I wasn't trying to delay or
4 prevent the defence from getting any of this disclosure.

5 If I was asked to get this disclosure, or get this item
6 or this item on the disclosure list, I would try and, if
7 it wasn't a positive response from whichever department
8 I went to, then I would refer it back to discussion,
9 I presume, between Mr Singh and the defence solicitors.

10 **Q.** Can we look at FUJ00153157, please. We're now in July
11 2010. If we look down to page 2, we see there a request
12 from Ms Misra's solicitor, Issy Hogg and it relates to
13 a meeting that's taken place between the defence expert,
14 Charles McLachlan, and Gareth Jenkins. She's requesting
15 access to the system in the Midlands where it appears
16 there are live, reproducible errors. She refers there
17 to the Known Error Log in that third bullet point?

18 **A.** Yes.

19 **Q.** If we scroll up, please, Jarnail Singh is sending
20 an email to you and to Warwick Tatford saying:

21 "Could you please be kind enough to let me have your
22 urgent instructions as to access and information she is
23 requesting in respect of the system in the Midlands and
24 the operation at Chesterfield and the error logs."

25 Now, who did you understand Mr Singh to be asking

75

1 and that they'd have to do something called a Section 8
2 statement or Section 8 application at court. I can
3 remember that about some of the disclosure requests and
4 also that we weren't obliged to supply this or that. So
5 they're the things I can recall about disclosure by
6 Mr Singh.

7 **Q.** Can we please look at POL00054557, please. This is
8 a message from Jarnail Singh to yourself of 6 April
9 2010. If we have a look there, it looks as though it
10 took until approximately that time to disclose the
11 transaction logs and also the Helpdesk logs?

12 **A.** Yes.

13 **Q.** It says:

14 "I understand that the defence have now reviewed the
15 disk containing", and it refers to the 430,000
16 transactions.

17 Then it says, if we scroll down:

18 "With regards to the defence request for all the
19 Helpdesk calls ... I now have the disk containing the
20 information which I have copied and will forward ... you
21 ..."

22 Am I right to understand your evidence that you
23 accept that that's all rather late in the day and it
24 simply shouldn't have taken this amount of time?

25 **A.** Yes, there was a really long period between the defence

74

1 for instructions with regards to disclosure?

2 **A.** Well, I'd have thought it would be to me, to find out
3 about the system in the Midlands and the operation at
4 Chesterfield. I can remember dealing with those or
5 trying to deal with those items.

6 **Q.** Did you regard yourself as somebody who could give
7 instructions?

8 **A.** No.

9 **Q.** Who, in your view, would have been the appropriate
10 person to provide instructions?

11 **A.** Well, Mr Singh -- or, sorry, Mr Tatford.

12 **Q.** Mr Tatford was counsel in the case, so counsel
13 traditionally takes instructions, rather than gives
14 them.

15 **A.** I'm a bit confused by the question. If I can just take
16 a moment --

17 **Q.** Who did you regard in this particular case to be the
18 client who provided instructions to their Legal Team?

19 **A.** Well, that would be Mr Singh, wouldn't it? He would
20 provide instructions to -- I'm not sure.

21 **Q.** If we scroll up, you have emailed Penny Thomas asking
22 Gareth to explain in more detail those points and, if we
23 scroll to page 1 we see a detailed response from Penny
24 Thomas. She refers to access to the system in the
25 Midlands and she says:

76

1 "It would appear that challenges is aware of a Post
2 Office which was having issues similar to those which
3 have resulted in prosecution ..."

4 Are you aware of which case that is, at all?

5 **A.** It doesn't mention it, does it?

6 **Q.** No, it just refers to a system in the Midlands.

7 **A.** No, I don't. I don't believe I do, no.

8 **Q.** "System Change Requests", at the bottom, it says:

9 "Basically, he was asking to look at all system
10 faults. I suggested that as we kept all testing and
11 Live faults in the same system and there were about
12 200,000 of them then this wasn't going to get him far."

13 After that she says:

14 "My view is that Charles is 'fishing' and I don't
15 personally support any of these requests. However they
16 seem harmless -- other than wasting a lot of people's
17 time -- and hence money."

18 We're now very far down the line, July 2010. You're
19 being told about something called a Known Error Log.

20 Did you know what the Known Error Log was?

21 **A.** No.

22 **Q.** No? A post Office in the Midlands experiencing
23 problems, 200,000 system faults: when you add that to
24 the knowledge that we've established that you had about
25 Callendar Square, about magazine articles, growing

77

1 more able witness to be cross-examined [than] Anne.
2 Penny is unaware at the moment as to what the issue was
3 with Callendar Square but hopefully a statement should
4 be with me by the end of [the] week."

5 Are you able to assist us with what was meant there
6 by the fact that Gareth Jenkins would be a "more able
7 witness" to be cross-examined?

8 **A.** I think this is what I was -- again, I think I recall
9 there were some emails from Anne to Gareth asking if he
10 could deal with it and Gareth agreed, I think.

11 **Q.** Were you aware, for example, of any concerns that Anne
12 Chambers had expressed after the *Lee Castleton* trial in
13 January 2007 about giving evidence?

14 **A.** I think there's a document that was served late
15 yesterday that I was asked to look at, and I think, in
16 there, Anne Chambers has said that she was approached by
17 an Investigator to give some evidence but she --

18 **Q.** So you've seen now this reflections document that the
19 Inquiry has seen but, at the time, as at January 2010,
20 were you aware of concerns that had been expressed by
21 Anne Chambers about giving evidence?

22 **A.** No, I don't recall. I don't recall much about Anne
23 Chambers.

24 **Q.** So "more able to be cross-examined". What does that
25 mean? Does that mean --

79

1 number of cases, the issue with ARQ data, why didn't all
2 of those together change your view as to the reliability
3 and integrity of the Horizon system?

4 **A.** Well, with hindsight, it should have done but, at the
5 time, I was probably focused on only offices where
6 an actual fault with Horizon had been identified.

7 **Q.** I'm going to move on now to expert evidence and I'll
8 only be relatively brief on this. Jarnail Singh has
9 given evidence that you were Gareth Jenkins' main point
10 of contact. Would you agree with that?

11 **A.** Well, I would go through Penny Thomas, we used Penny
12 Thomas and then she would -- I'd contact Penny Thomas
13 and say, "Can we have this, this, this and this", and
14 then she would probably forward it to Gareth.

15 **Q.** You've been very open in your witness statement about
16 not being aware of the various duties of an expert and
17 I'd just like to ask you a little bit about your
18 relationship with Mr Jenkins and your level of
19 involvement with the evidence that he gave. Can we
20 please look at POL00167129. So we're going back in time
21 now to January 2010. This is in the context of
22 Ms Misra's case. You say to counsel, Warwick Tatford:
23 "Penny Thomas telephoned me late yesterday and said
24 that their expert, Gareth, would compose a witness
25 statement dealing with Callendar Square as he would be

78

1 **A.** Well, maybe had more knowledge about the Callendar
2 Square bug. That's --

3 **Q.** "More able witness to be cross-examined" though. It
4 suggests that some sort of judgement has been made about
5 how they would present to the court or whether they
6 might be undermined; do you recall making any kind of
7 judgement along those lines?

8 **A.** No, I wouldn't. I really can't add much to that at all.

9 **Q.** Can we move on then to FUJ00153029. 5 March 2010, if we
10 look at the bottom email we have an email from Penny
11 Thomas to Jarnail Singh and to you and she says:

12 "Jon

13 "We need some help with analysis and witness
14 statement generation for Gareth, would you be available
15 Monday or Tuesday to visit us and help?"

16 Are you able to assist us with what she may have
17 meant by "analysis and witness statement generation for
18 Gareth"?

19 **A.** All I can recall, my only -- my intention was to go and
20 take a witness statement from Mr Jenkins, and I actually
21 travelled to their Fujitsu Head Office with my laptop to
22 sit down with him and to obtain a statement but he
23 advised me that he would write his own witness
24 statement, so ...

25 **Q.** Did you help him with some analysis, though?

80

1 A. No, I've got no knowledge in that area or -- you know,
2 to offer any help with analysis for Mr Jenkins.

3 Q. Could we please look at FUJ00122906. This is the
4 witness statement we looked at before, where you did
5 insert a paragraph relating to Seema Misra's case,
6 a Seema Misra-specific paragraph. It's also the
7 statement where he describes the issues with Horizon
8 Online and the duplication in ARQ data and I'd like your
9 assistance, please, with the handwritten note that's on
10 page 2. Is that your handwriting there?

11 A. No, I've tried to read it but I can't, if --

12 Q. Let me tell you what I think it says and you may be able
13 to assist us with whether that jogs your memory about
14 a conversation. It looks like it says:
15 "Rang Jon Longman 12.00, 21 July and advised that
16 contrary to paragraph 2, page 2, POL had not greet to
17 this workaround."
18 It may say "workaround", that's one reading of it:
19 "He said he was happy that as a representative of
20 POL he had agreed this process in this case. He will
21 come back to me if he requires a replacement statement."
22 Do you recall a discussion about the workaround to
23 provide in respect of the duplicate ARQ issue and that
24 it seems as though, on one reading of this, you were
25 content for it to happen in this particular case but you

81

1 we're now in October 2010, and you say:
2 "Gareth
3 "I have scanned a few of the Branch Trading Accounts
4 for analysis as agreed last night. I have more, but
5 would envisage that this sample should be enough for you
6 to prove whether she was hiding money in the cash in
7 pouches awaiting collection figure and more importantly
8 whether it was increasing."
9 Are you able to assist us with the work that you
10 were carrying at there and whether or not this was some
11 sort of analysis or assistance you were providing to
12 Gareth Jenkins?

13 A. No, it's no form of analysis. It was just sending
14 Mr Jenkins branch trading accounts for him to look at,
15 and do what whatever analysis he thought he needed to do
16 to see if there was any money that was being hidden in
17 cash and pouches.

18 Q. Wasn't that something -- I mean, Mr Jenkins, presumably,
19 would have had access to the Horizon data from the
20 Fujitsu side. Why would he need you to assist him in
21 providing information like that?

22 A. Well, I had the copies of these branch trading accounts
23 so I just copied them and sent them to him.

24 Q. Did you see the two of you in some way working together?

25 A. No, not at all. All I'm doing is just sending him some

83

1 weren't giving a view as to, for example, whether the
2 Post Office was happy with that going forward?

3 A. I'm afraid I can't recall what was meant by that or
4 what's meant by that note. I really don't know what it
5 means or why -- and, you know, what my thoughts were at
6 the time on this. I'm sorry, I just can't offer any --

7 Q. That's absolutely fine. There's another statement
8 that's produced by Gareth Jenkins. Very quickly go to
9 FUJ00122999. I'm only taking this really for
10 chronological reasons. We're now in 6 October 2010 and
11 he emails to say:
12 "It was good to meet you last night and put some
13 faces to names and voices. Following that I've now
14 attempted to draft a witness statement ...
15 "Here is the first draft and I'd appreciate feedback
16 as to whether I have captured your requirements as to
17 style and approach. I appreciate that you probably
18 cannot comment on factual content."
19 Then behind that we see a further witness statement,
20 and perhaps, if we just look at page 9, we can see that
21 this is the statement that refers to Callendar Square,
22 at page 9.
23 In respect of whether you assisted Mr Jenkins with
24 some analysis, can we please look at FUJ00154934,
25 please. It's an email sent by you to Gareth Jenkins,

82

1 documents. Nothing more than that.

2 Q. I'm going to move on now to my final topic, which is
3 specific, really, to this phase, Phases 5 and 6, and
4 growing concerns about Horizon within the business.
5 Can we start by looking at POL00175972. So we're
6 here in the summer of 2010, 19 July 2010, and this is
7 an email chain that is sent to you. But I want to start
8 at the bottom of the chain, so over the page, please.
9 There's an email from somebody called Andrew Daley
10 Security Programme Manager. He was part of your team?

11 A. Yes, he was.

12 Q. He says "Hi All", and I don't think this one is sent to
13 you but you're on the chain higher above:
14 "Have you guys heard anything from the [Post Office]
15 Executive on the Horizon integrity risk?
16 "The Investigators are concerned that if we lose
17 a case based on the Horizon integrity, we'll be in
18 a world of trouble. They have also been getting queries
19 from solicitors during case briefings. So this is still
20 very much in the spotlight and not going away."
21 Now, this is during the time that we've seen quite
22 a lot of the correspondence relating to Seema Misra's
23 case. What were you aware of, in respect of the Post
24 Office Executives concern regarding the Horizon
25 integrity risk?

84

1 A. No, I had not heard anything or -- about the Post Office
 2 Executive or, you know, on the Horizon integrity risk.
 3 Q. It says:
 4 "The Investigators are concerned that if we lose the
 5 case based on Horizon integrity, we'll be in a world of
 6 trouble."
 7 You were one of the Investigators dealing, at that
 8 moment in time, with a case relating to Horizon
 9 integrity. Are you one of those Investigators who
 10 thought that you might be in a world of trouble?
 11 A. Well, no, I mean, all I can say is that Andrew Daley
 12 wasn't an Investigator in my team. I think he was maybe
 13 up north somewhere, so maybe it's his particular team
 14 that --
 15 Q. Yes, so if we scroll down, it says he's part of Fraud
 16 Strand North?
 17 A. Yeah, I think he was up in Scotland.
 18 Q. So you weren't aware at that stage about concerns
 19 amongst the Post Office Executive?
 20 A. No.
 21 Q. If we scroll up, please, we have an email from Andrew
 22 Hayward, I think, to Andrew Daley. He says:
 23 "Andrew,
 24 "Sue Lowther's team have reviewed this on behalf of
 25 Security ..."

85

1 email from Andy Hayward and he says to Graham:
 2 "At yesterday's SLT [I think that's Senior
 3 Leadership Team] Nigel Viles ..."
 4 Do you recall Nigel Viles?
 5 A. I haven't heard of Nigel Viles.
 6 Q. You have or haven't, sorry?
 7 A. I haven't sorry.
 8 Q. "... mentioned that one of the Investigators had
 9 mentioned concerns re: Horizon challenges in one of his
 10 cases (this being you I believe). Please see my recent
 11 reply to the team on this matter. If however you need
 12 further and specific support please let Jason/myself
 13 know or if required contact Dave K."
 14 Then above there's an email copied to you. It says:
 15 "I know my memory isn't what it used to be but
 16 I think this might relate to Jon Longman's West Byfleet
 17 case. Apparently it was raised by a couple of the team
 18 (not Jon) at a recent focus group meeting led by Nigel."
 19 So it seems to have been sent to you because you
 20 were involved in Seema Misra's case, in July 2010, so
 21 prior to the conclusion of Seema Misra's case, and
 22 referring to concerns within the business, the Senior
 23 Leadership Team, also a reference to the Post Office
 24 Executive, and concerns regarding the Horizon integrity
 25 risk. Is this not something that would have jumped out

87

1 Was that your team?
 2 A. Security, yes, well --
 3 Q. Sue Lowther's team?
 4 A. I wasn't in Sue -- no, Sue Lowther, she wasn't in the
 5 Investigations Strand. She might have been in one of
 6 the other strands in Security, I don't know.
 7 Q. "... and will be producing a briefing summary for the
 8 stakeholders. In essence it will state that there are
 9 no underlying issues or trends identified regarding the
 10 Horizon challenges to date and that we will continue to
 11 'manage' each case as and when further challenges arise.
 12 This is also the recommendation from the Legal Team in
 13 that if we carry out a 'drains up' exercise we are
 14 leaving ourselves open to an even greater risk of
 15 challenge (ie in simple terms: why are you looking if
 16 you say everything is okay!)."
 17 What did you understand by that when you received
 18 this email? I know that you're not a direct recipient
 19 here but you are -- if we look above, this is an email
 20 that was sent to you. Do you recall receiving that
 21 email?
 22 A. I don't recall the contents of it, no. If I'm copied
 23 in, I must have received it, but --
 24 Q. So we see the top email from Graham Brander to yourself.
 25 I'll just read the one just below that first. It's an

86

1 at you at the time, as being a real concern?
 2 A. I just don't recall these. You know, I can see that
 3 I've been copied in there. I really can't comment -- it
 4 doesn't, you know, jog any memory at all. Never heard
 5 of Nigel Viles that I can recall, anyway.
 6 Q. Let's move on in time, to POL00055590. We're now in
 7 October 2010. This is the well-known email that we've
 8 seen a number of times in the Inquiry from Jarnail
 9 Singh, congratulating people on the success in the *Seema*
 10 *Misra* case:
 11 "We were beset with an unparalleled degree of
 12 disclosure requests ... we were able to destroy to the
 13 criminal standard of proof ... every single suggestion
 14 made by the defence.
 15 "It is to be hoped the case will set a marker to
 16 dissuade other defendants from jumping on the Horizon
 17 bashing bandwagon."
 18 Was that a view that you shared at the time, that
 19 there was a Horizon-bashing bandwagon?
 20 A. No, not at all. I do recall this email. I think I had
 21 to read it twice to sort of really make sure what -- you
 22 know, just to confirm what had been written and I'd have
 23 to say that I don't know why that comment was put in.
 24 I mean, it wasn't necessary and I didn't respond to that
 25 email. I remember. I remember it clearly and, you

88

1 know, I don't see that there was a Horizon-bashing
 2 bandwagon going on.
 3 **Q.** Well, it is, though, consistent with that previous email
 4 that we just looked at, relating to the large number of
 5 challenges that are going on at that time relating to
 6 the Horizon system. Were you aware --
 7 **A.** Sorry --
 8 **Q.** Did you think that the *Seema Misra* case was significant
 9 in relation to dissuading other defendants from
 10 challenging Horizon?
 11 **A.** No, I don't think it was going to dissuade. It
 12 developed, if you like, into -- and I didn't know this
 13 at the time but I think there was a lot of people in
 14 different departments within the Post Office watching
 15 the outcome of this very closely. So it sort of
 16 developed into a bit of a test case, I suppose you could
 17 say.
 18 **Q.** You say you didn't know it at the time. Can we please
 19 look at POL00169170. This the follow-up email from Rod
 20 Ismay that the Inquiry has also seen, 22 October. He
 21 says there, and you're included in this email:
 22 "... please note Dave Smith's thanks to all of you
 23 for your work on this important case."
 24 I think that's who we know as David Y Smith, former
 25 Managing Director.

89

1 **Q.** By 22 October 2010, were you aware of very senior
 2 interest in your case?
 3 **A.** Well, I can see from that email, yes, that what I was
 4 trying -- the point I was and to make is I didn't know
 5 at the time the case was progressing that it had gone up
 6 to a senior level and that there was a -- you know,
 7 there was a close eye on the case because I wasn't
 8 reporting to anybody -- any of these people. Obviously,
 9 Jarnail and Mr Tatford but I wasn't really talking to
 10 any of these other people.
 11 **Q.** Putting this email to one side, by this stage, were you
 12 aware that members of the Executive Team had been
 13 interested in the case? Even if you weren't aware
 14 during the case, were you aware at that stage that they
 15 were, by then, interested?
 16 **A.** Well, only by seeing this email. Sorry, did you say
 17 "put this to one side"?
 18 **Q.** Yes, if we put this email to one side, do you recall any
 19 conversations or anyone telling you?
 20 **A.** No, no. Not at all, that I can recall.
 21 **Q.** Can we please look at POL00176080. Moving to the next
 22 month, November 2010, we have an email at the bottom
 23 there from Ann Bailey, Former Agents Accounting, and she
 24 says:
 25 "On the West Byfleet case have you received the

91

1 **A.** Right.
 2 **Q.** It says:
 3 "Dave and the ET [the Executive Team] have been
 4 aware of the significance of these challenges and have
 5 been supportive of the excellent work going on in so
 6 many teams to justify the confidence that we have in
 7 Horizon and in our supporting processes."
 8 So you were presumably aware at that time, October
 9 2010, that there was quite senior people discussing,
 10 aware of and interested in the result of your case?
 11 **A.** No.
 12 **Q.** Were you not aware of that?
 13 **A.** No, this case came to me and I dealt with Mr Singh and
 14 Mr Tatford, and that's -- it was the three of us who
 15 just dealt with this case. I didn't know that anybody
 16 was reporting to anybody on the Executive Team or
 17 keeping them informed on this case. I don't --
 18 **Q.** I mean, you're copied into this email. Didn't you think
 19 "Oh, gosh, you know, some very senior people in this
 20 business are very happy with the work that I've done"?
 21 **A.** Well, yes, I can see that but, during the conduct of the
 22 case and going to trial, I wasn't aware that, you know,
 23 other than the three names I mentioned, myself, Mr Singh
 24 and Mr Tatford, that anybody else was watching this case
 25 as closely as they were.

90

1 official notice from the court yet and would it be
 2 possible to let us have anything or would you know of
 3 where we could get the court transcripts?"
 4 Then she says:
 5 "I was [very] surprised to hear from Sarah that
 6 Mrs O'Dell is now trying to go down the route of blaming
 7 Horizon for the loss."
 8 Now, this is quite late, November 2010. We started
 9 today looking at the O'Dell case. Who was Ann Bailey
 10 and why, as far as you were aware, would she be
 11 interested in those two cases?
 12 **A.** Well, it says she's a former agent, so I don't know if
 13 she's tasked with trying to recover monies as a result
 14 of losses. She's based in Chesterfield and that's what
 15 she's typed and that's what's she's made her view to be,
 16 that Mrs O'Dell was going down the route of blaming
 17 Horizon for the loss. But I'd like to say that that
 18 wasn't my -- you know, there's no input from me and that
 19 wasn't my view.
 20 **Q.** I mean, we spoke earlier about your thoughts about
 21 whether or not you should have been disclosing in the
 22 *Misra* case the facts relating to the O'Dell case. Did
 23 this November 2010 email not make you think "Ooh, gosh,
 24 maybe I should have been drawing some dots between the
 25 two"?

92

1 A. No, it didn't. Maybe I should have done but, at the
2 time, it didn't. It didn't occur.

3 Q. We're going to move on now to September 2011. Can we
4 look at POL00056857, and we see an email here at the
5 bottom from Penny Thomas to you, and the title there is
6 "Horizon Integrity Challenges", and it refers to the
7 cases of Scott Darlington and Julian Wilson. Are you
8 able to assist us with what your involvement was with
9 Horizon integrity challenges by September 2011?

10 A. I'll try to give you a shortened version but, after
11 Ms Misra's trial, it was either the -- some solicitors
12 sitting at London asked either Dave Pardoe or John Scott
13 who worked in Security whether I could go and assist
14 them with getting some of the documentation, because
15 they were having -- I think Shoosmiths was the
16 solicitors acting for these two post offices and they
17 were making quite a number of disclosure requests and
18 they thought that I could be -- you know, I could be
19 useful in helping them get these disclosure requests.

20 Q. Thank you. I'm going to take you to one other document
21 around the same time, POL00056928. Did you have formal
22 role at all in relation to drawing together these
23 various cases by 2011?

24 A. Well, they were trying to free up some of my workload in
25 the Investigation Department, so that I could spend more

93

1 yes.

2 Q. If we turn to page 3, please, the bottom of page 3.
3 I think the evidence that you've just given is that you
4 were concerned about having sufficient time to dedicate
5 to this particular task; is that right?

6 A. Yes, that's right. I was -- they wanted me to assist
7 them as much as possible but I still had other jobs to
8 do within the Investigation Department. So I had to
9 bring it up with my manager to try to free up some of my
10 investigation cases, so that I could spend more time
11 helping the -- the solicitors.

12 Q. If we scroll up, we can see there that you're described
13 as, it says there -- "his help" -- sorry, the top of
14 page 3:
15 "... it looks as though there may be an issue with
16 Jon Longman's ability to assist on the Horizon claims.
17 His help is extremely valuable and is saving
18 considerable legal cost, so I wonder if anything can be
19 done to free him up ..."

20 If we keep on scrolling up to page 2, there's even
21 a reference at the top of page 2, from Hugh Flemington,
22 saying:
23 "Apparently having Jon Longman help us is saving us
24 hundreds of thousands in external fees.
25 "Problem is [he] is being pulled in [many]

95

1 time trying to, you know, retrieve documents, training
2 records, whatever was requested. So I was doing a bit
3 of my existing job and trying to dedicate as much as
4 I could to retrieving documents to help serve on
5 Shoosmiths.

6 Q. Can we please turn to page 5 of this email chain.
7 There's reference at the bottom email there, or the
8 middle email, to the case of Julian Wilson, do you
9 recall being involved in that?

10 A. In terms of retrieving documents, yes, but I had no
11 involvement in the actual investigation.

12 Q. So is this the same job? I mean, we saw there before
13 Scott Darlington and Julian Wilson. I'm just going to
14 read a little bit to you here, it says:
15 "As you may be aware, we have just received two
16 claims from former subpostmasters challenging the
17 integrity of Horizon and claiming they did not receive
18 adequate training -- we expect to receive more in the
19 next few weeks as this has been building a head of steam
20 for years."
21 Was that a sentiment that you shared at that time,
22 that Horizon challenges had been building a head of
23 steam for years?

24 A. Yes, I think they'd been increasing, the number of
25 challenges. So I would have agreed with that comment,

94

1 directions."
2 How is it you were saving them hundreds of thousands
3 in external fees; what is it you were doing?

4 A. All I was doing was trying to retrieve documents, like
5 training records -- well, just dealing with any
6 disclosure requests that the Shoosmiths solicitors --
7 I think it was Shoosmiths -- wanted. So maybe I was
8 cheaper to employ than a solicitor to employ and do this
9 type of work. That's -- I don't know of hundreds of
10 thousands but, yeah, that's all I can offer on that
11 point.

12 MR BLAKE: Sir, I only have two more documents to go to.
13 Would you like to take our lunch now, and come back
14 perhaps ten minutes early? We do, I'm told, have
15 sufficient time this afternoon.

16 SIR WYN WILLIAMS: Well, I am in your hands, really,
17 Mr Blake, as to what you think is the more efficient.

18 MR BLAKE: Perhaps if I could finish now, so if we could sit
19 until 1.10, I think that would be helpful.

20 SIR WYN WILLIAMS: All right, fine.

21 MR BLAKE: Thank you very much.
22 Can we please look at POL00056927, please. We're
23 now on 15 September 2011. Over the page, please.
24 There's an email from Dave Pardoe saying:
25 "Jason, would you please give me a feel for what Jon

96

1 has on at the moment -- has he discussed with you his
 2 Horizon commitment? Other than the FS piece what else
 3 has he got on please? Clearly, the Horizon issue
 4 a biggie and we may need to look at stripping out his
 5 workload to accommodate."

6 Then if we scroll up, we see an email that sets out
 7 your current workload. You had 12 operational cases on
 8 hand, various other matters. If we look down, it says:

9 "10 cases have been identified by Civil Litigation
 10 in regards to potential challenges, when engaged in
 11 seeking recovery for outstanding debts to former
 12 [subpostmasters], of these 10, 2 have enacted no win, no
 13 fee lawyers and were challenging the business."

14 Then it explains what you were doing. You were
 15 a facilitator to the matter, assisting in the provision
 16 of evidential information or individual experts in areas
 17 that require witness statement support and, moving
 18 forward, you have asked for a steer.

19 I'm going to move on to one other document on the
 20 same point and that is FUJ00155070. So you were
 21 gathering all this information for the civil litigation
 22 or potential civil litigation, presumably using the
 23 knowledge that you had obtained over the years in
 24 dealing with cases?

25 **A.** Well, a lot of the retrieval of information where I had
 97

1 four post offices for the following periods."

2 I mean, is this a theme now that has translated from
 3 the criminal cases that you were doing now to the civil
 4 cases, that it's all going to cost too much and,
 5 therefore, the number of requests should be limited?

6 **A.** Well, can I just make it clear that that wasn't my
 7 comment. That was what was said by the solicitors at
 8 the meeting. So I didn't go there and say, "Oh, it's
 9 very costly, you should challenge it". I just want to
 10 make that clear. It came out from the meeting with the
 11 solicitors that this was their feeling and I hadn't --
 12 you know, I had no involvement in that. They just came
 13 up with this, so I can't comment whether it's crossed
 14 over from the criminal side of the investigation to the
 15 civil lit side.

16 **Q.** But did you notice a similar approach taken by the Post
 17 Office with regards to disclosure of information to
 18 those requesting it?

19 **A.** Well, again, as you can see, costs was a big issue to --
 20 in disclosing this information.

21 **Q.** Was it just costs or were there other concerns? Let me
 22 take you to another document, it's POL00057175. Thank
 23 you. If we scroll down to page 3, we have an email from
 24 Emily Springford, who is a principal lawyer and in
 25 dispute resolution. This is an email not sent to you,
 99

1 knowledge was about Fujitsu data and a lot of it was
 2 that they wanted costings for this amount of ARQ data.
 3 I wouldn't say I had a lot of knowledge about retrieving
 4 our training records and records from within the Post
 5 Office because that turned into a bit of a nightmare at
 6 times, trying to retrieve stuff like that. But I think
 7 the main point they might have wanted to use me for was
 8 to access or be the key to the door to get into Fujitsu
 9 and, you know, knowing the relevant people there for
 10 getting the information from them.

11 **Q.** If we look at page 3, there's an email from you raising
 12 some concerns about the costs of that work. You say, as
 13 follows:

14 "I have just had a meeting with some of our lawyers
 15 who are dealing with the Horizon integrity issues ...

16 "The requests for information are getting very large
 17 and the feeling from the meeting is a lot of this
 18 information is unnecessary and should be challenged.

19 A decision was also made that we need to make the
 20 solicitors acting for subpostmasters aware of the cost
 21 of retrieving the data from Fujitsu and get
 22 an undertaking that they are willing to meet this cost.

23 Therefore, I would be grateful if a costing could be
 24 obtained as soon as possible from Fujitsu for the
 25 Transaction Log data and Fujitsu error log data for all
 98

1 it's sent to a number of senior individuals within the
 2 Post Office business. She refers to the four letters of
 3 claim. This is an email regarding document disclosure
 4 and preservation and also addresses future
 5 communications. She says, for example:

6 "Please ensure that this communication reaches
 7 everyone in your department who has access to, or who is
 8 in a position to create, documents relating to the
 9 issues arising in the claims ..."

10 This is an email that we may well come on to in due
 11 course in this phase. If we scroll down, it addresses
 12 documentation preservation and also document creation.
 13 But I want to ask you about the very final paragraph.
 14 So, over the page to page 5, please. It says:

15 "The volume of information required is significant,
 16 so in order to make this fact-finding exercise as
 17 manageable as possible, our external lawyers have
 18 highlighted in yellow the information which it is
 19 absolutely necessary to gather in the next week or so.
 20 The information which is not highlighted is less urgent.
 21 Jon Longman in [Post Office] Security has been tasked
 22 with gathering this information but he is encountering
 23 some difficulties from various business areas in getting
 24 responses back quickly. Please would you support Jon as
 25 much as possible in the process ..."
 100

1 Did you experience problems in obtaining information
 2 within the Post Office in respect of the civil
 3 litigation?
 4 **A.** Yeah, as I think I mentioned it briefly earlier, things
 5 like training records were some of the documents that
 6 were requested, and you'd ask for the training records,
 7 and they weren't where they should be. And we were
 8 having real issues trying to track down that sort of
 9 information. It became a bit of a nightmare for certain
 10 items. So that's what I'm referring -- well, that's
 11 what I think she might be referring to, that I was
 12 having difficulty, you know, I was getting mainly
 13 cooperation from all the other departments but there
 14 were some documents that were difficult to pinpoint and
 15 find.
 16 **Q.** Thank you very much.
 17 Looking at your work during 2011 on all of those
 18 Horizon integrity cases, the civil challenges, did you
 19 ever reflect on the work that you had undertaken as
 20 an Investigator and did that make you question some of
 21 the lines that you had taken over the years regarding
 22 the reliability and robustness of Horizon?
 23 **A.** The -- Horizon -- we've never been made aware that
 24 Horizon had any bugs or issues. All our cases where we
 25 used ARQ data was always supported by statements from
 101

1 Participants. Perhaps we could come back at 2.00.
 2 **SIR WYN WILLIAMS:** All right, fine.
 3 **MR BLAKE:** Thank you very much, sir.
 4 (1.10 pm)
 5 (The Short Adjournment)
 6 (2.00 pm)
 7 **MR BLAKE:** Good afternoon, sir, can you see and hear me?
 8 **SIR WYN WILLIAMS:** Yes, I can, thank you.
 9 **MR BLAKE:** Sir, we have some questions from Core
 10 Participants, they should last around 30 minutes. First
 11 we're going to hear from Ms Oliver, on behalf of Gareth
 12 Jenkins, and then from Mr Henry, and then from Mr Stein,
 13 and then we'll proceed to a very short break while
 14 everyone will stay in the room for five minutes, and
 15 we'll go on to hear from Mr Leighton.
 16 **SIR WYN WILLIAMS:** Very well.
 17 **MR BLAKE:** Thank you.
 18 Questioned by MS OLIVER
 19 **MS OLIVER:** Good afternoon Mr Longman, I ask questions on
 20 behalf of Gareth Jenkins.
 21 I just want to look at two occasions, if I may,
 22 where you received information from Mr Jenkins during
 23 the course of the *Seema Misra* case. Firstly, if we can
 24 have up, please, POL00175703, please.
 25 Thank you very much. This is an email from you to
 103

1 Fujitsu saying it was in working order. So -- but as
 2 I performed this role, I began to get even more aware
 3 that there was more challenges coming in. Now, if these
 4 challenges had been investigated and they all had bugs
 5 then, obviously, that would have, you know, had
 6 a greater emphasis that there was something wrong with
 7 Horizon.
 8 At this stage, they were just -- they'd -- nothing
 9 had been proven with the Horizon system. So yeah, I was
 10 becoming aware that Horizon integrity challenges were
 11 increasing.
 12 **Q.** But did it not make you think "Ooh, I was involved in
 13 the prosecution of Seema Misra, there seemed to be
 14 a number of people who are saying that they've had
 15 serious problems with Horizon, maybe she was right all
 16 along"?
 17 **A.** Well, the fact that we were successful in the case of
 18 Seema Misra probably suggested to me that there wasn't
 19 anything wrong with Horizon.
 20 **Q.** Did it make you question the disclosure decisions that
 21 you had made throughout that case?
 22 **A.** No, not until this Inquiry came about did I realise that
 23 there were issues with disclosure.
 24 **MR BLAKE:** Thank you, sir. I think that is an appropriate
 25 moment. There will be some questions from Core
 102

1 Penny Thomas on 29 January 2010 and it says:
 2 "Penny
 3 "When Gareth completes his statement about Callendar
 4 Square could he also mention whether there are any known
 5 problems with the Horizon system that Fujitsu are aware
 6 of. If none could this be clarified in the statement."
 7 Do you remember making that request?
 8 **A.** Yes, I do.
 9 **Q.** Did that request derive from some advice that you had
 10 received from Mr Tatford --
 11 **A.** It did, yes.
 12 **Q.** -- in relation to POL's disclosure obligations?
 13 **A.** Yes.
 14 **Q.** Thank you. If we can have up, then, please,
 15 FUJ00167159. It's FUJ00167159 -- let me check that
 16 reference, I'm sorry.
 17 It is an email we've looked at over lunch on the
 18 system, so I'm hoping that it will be available. Can we
 19 try it, this may be my error, I'm sorry if it is.
 20 Can we try POL00167159. Apologies.
 21 Thank you. That's the one, I apologise.
 22 Can we scroll down, please, thank you. This is
 23 an email from David Jones to Mr Singh that was forwarded
 24 to you on 8 February 2010. Do you recall that email?
 25 **A.** Well, if I was copied into it, you know, I would have
 104

1 read it at the time.
 2 **Q.** All right. Thank you. If we can look at paragraph 3,
 3 what Mr Jones says there is:
 4 "He is not currently in a position to make a clear
 5 statement. It is possible for there to be problems
 6 where transactions have been 'lost' in particular
 7 circumstances due to locking issues. When this happens
 8 then we have events in the underlying eventing logs to
 9 indicate that there was an issue. Whenever we provide
 10 transaction logs to POL we check for any such events.
 11 In the case of West Byfleet we have not been asked to
 12 provide any transaction logs and so have not made these
 13 checks."

14 This, I suggest, was a response to your question of
 15 the 29 January as to whether there are any known
 16 problems within Horizon; do you recall that?

17 **A.** I remember asking, obviously, the question on the
 18 previous statement. Whether this particular paragraph
 19 relates to that, I'm not sure.

20 **Q.** All right. But what is clear, isn't it, is that what
 21 Mr Jenkins or what you are being told from Mr Jenkins is
 22 that he can't make a clear statement to that effect and
 23 that there are possibly problems where transactions can
 24 be lost within Horizon; do you agree with that?

25 **A.** Yes, and that it needs transaction logs to make checks
 105

1 and, if I can please have up -- and I hope I've got the
 2 reference right -- it's FUJ00153157. If we can scroll
 3 down, please. You've been taken to this document
 4 earlier in your evidence. If we can scroll down,
 5 I think to page 2, please -- a little further -- the
 6 email from Issy Hogg, who was the defence solicitor for
 7 Mrs Misra. We can see here that the defence have made
 8 some further disclosure requests and the third of those
 9 is access to the system change requests, Known Error Log
 10 and new release documentation to understand what
 11 problems have had to be fixed. Do you recall that
 12 disclosure request?

13 **A.** Yes, I do.

14 **Q.** Thank you. Then, if we can scroll right up to the top,
 15 please -- thank you -- to point 3 within that email. So
 16 this is an email from Penny Thomas to you indicating
 17 that she's had a discussion with Gareth and outlining
 18 what his views -- or at least what his recollection of
 19 his discussion with Charles McLachlan was. At point 3:

20 "System Change Requests: Basically, he was asking to
 21 look at all system faults. I suggested that as we kept
 22 all testing and Live faults in the same system and that
 23 there were around 200,000 of them, then this wasn't
 24 going to get him far. He then suggested looking at
 25 system changes and would like to see all the changes
 107

1 for the West Byfleet case to see if there was any
 2 issues.

3 **Q.** Can you recall whether this information about
 4 potentially lost transactions prompted any further
 5 investigative steps by you?

6 **A.** I can't recall any, no.

7 **Q.** Did you consider this material from Mr Jenkins in light
 8 of your disclosure obligations?

9 **A.** No, I probably didn't at the time.

10 **Q.** Do you recall whether you sought any advice about this
 11 material from Mr Singh or Mr Tatford?

12 **A.** Well, I don't know. I don't think so but I'm not sure.
 13 Can I just -- who was copied into this email?

14 **Q.** So if we scroll up, we can see that the original email
 15 goes to Mr Singh and is copied to Mr Jenkins, and then,
 16 if we scroll up to the top of that page, please, it's
 17 forwarded "Warwick and Jon for your information and
 18 comments", from Mr Singh?

19 **A.** So myself, Mr Singh and Mr Tatford knew about that
 20 paragraph.

21 **Q.** Yes. Can you recall if there was any discussion between
 22 you as to what to do with that material you'd been told
 23 by Mr Jenkins?

24 **A.** No, I can't, I'm afraid.

25 **Q.** Thank you. If we can turn, then, to the second topic
 106

1 that have happened to the system. Again, I don't think
 2 this will help and I don't know how practical it is for
 3 Fujitsu's Release Management to provide that. I think
 4 all we can do is ask the question."

5 Do you recall that email?

6 **A.** Yes, I do.

7 **Q.** Thank you. This, isn't it, is Mr Jenkins saying that
 8 this information that the defence have mentioned about
 9 system faults and changes exists and could be
 10 investigated by Fujitsu?

11 **A.** Yes. I'll go along with that.

12 **Q.** Thank you. A final document, please. Can I have
 13 POL00055073. Thank you. This was forwarded on by you
 14 to Mr Singh -- sorry, if we can just scroll down
 15 a little bit please. We see on 27 July 2010:

16 "Jarnail,

17 "This is the response that I have received from
 18 Penny following Issy Hogg's email."

19 If we can scroll down to the bottom of that page,
 20 please. Thank you:

21 "As for point 3, I will ask Penny Thomas whether
 22 Fujitsu's Release Management Team can provide the
 23 defence expert with system fault data."

24 So this is you indicating to Mr Singh that, in line
 25 with what has been suggested by Mr Jenkins, further
 108

1 enquiries can be made of Fujitsu about this material; is
 2 that right?
 3 **A.** That's correct.
 4 **Q.** Did you receive any guidance from Mr Singh or Mr Tatford
 5 about investigative steps that ought to be undertaken in
 6 relation to what you've been told about system faults
 7 and changes?
 8 **A.** I don't recall any guidance given.
 9 **Q.** Do you recall any guidance being given by Mr Singh or
 10 Mr Tatford in relation to how that material and
 11 information might impact on POL's disclosure
 12 obligations?
 13 **A.** Again, I can't recall any.
 14 **Q.** Did you consider how that material might impact on POL's
 15 disclosure obligations?
 16 **A.** It depends on what -- where this went, when I asked
 17 Penny Thomas -- sorry, I said I will ask Penny Thomas
 18 whether Fujitsu's Release Management Team can provide
 19 the defence expert with system fault data; it depends
 20 what was -- what happened thereafter.
 21 **Q.** Well, were you aware that work was done within Fujitsu
 22 as to what investigating that system change data would
 23 involve?
 24 **A.** No, I wasn't aware.
 25 **Q.** Okay. But, nonetheless, the defence requests regarding

109

1 That indicates a degree of communication, doesn't
 2 it?
 3 **A.** Yes, because when I picked up the civil litigation --
 4 when I was asked to assist with civil litigation,
 5 another thing that came out was that, because there
 6 could be more challenges, that any documentation for
 7 offices where Horizon could be raised as a challenge, we
 8 should make sure that we secure all documentation and
 9 don't shred anything or destroy it in line with our
 10 normal retention periods; we should keep it longer.
 11 So I was asked -- I can't remember how it came
 12 about -- but I was asked to devise a schedule or find
 13 out if anybody had any potential offices or had done any
 14 interviews where Horizon integrity may be raised and, if
 15 so, I was then trying to save all that data from being
 16 destroyed in line with retention policies, and that's
 17 how that schedule came together.
 18 **Q.** Thank you, Mr Longman.
 19 You had good communication with the Criminal Law
 20 Team, didn't you?
 21 **A.** What, during this case or --
 22 **Q.** Yes, during Mrs Misra's case.
 23 **A.** Yes, yes.
 24 **Q.** You also had liaison with Mr Jenkins, didn't you?
 25 **A.** Through Penny Thomas, yes.

111

1 system changes, the known error log and new release
 2 documents were refused before Fujitsu could feed back on
 3 that work. Were you aware of that?
 4 **A.** Again, because of the passage of time, I know certain
 5 disclosure requests were refused and this may have been
 6 one of them but I can't actually recall without seeing
 7 a document that says that.
 8 **MS OLIVER:** Thank you very much, Mr Longman, that's all
 9 I had.
 10 **SIR WYN WILLIAMS:** Thank you, Ms Oliver.
 11 Next, please.
 12 **Questioned by MR HENRY**
 13 **MR HENRY:** Thank you, sir.
 14 Mr Longman, I represent Seema Misra.
 15 Communication between you and your colleagues as
 16 Investigators in the Security Department, there must
 17 have been good communication between you?
 18 **A.** Well, between -- as an Investigator, you normally work
 19 with one or two colleagues on a regular basis and you'd
 20 probably have communication with them but, as a national
 21 team, I wouldn't say there was a good communication, no.
 22 **Q.** Well, you said earlier today:
 23 "When I started putting schedules together I became
 24 aware that other investigators had potential challenges
 25 to Horizon."

110

1 **Q.** But you felt able to, as it were, make changes to his
 2 statement and you must have had direct dealings with him
 3 during the course of the trial and in the run-up to the
 4 trial?
 5 **A.** No, I wouldn't -- I would say Mr Tatford really would
 6 liaise with Mr Jenkins more than I did.
 7 **Q.** Are you saying that you had no contact at all with
 8 Mr Jenkins in the run-up to the trial and during the
 9 trial?
 10 **A.** Well, I'd have limited contact, yes. I'd speak to
 11 him -- with regards to the statement that you mentioned,
 12 that paragraph was -- I was asked to review his
 13 statement. I don't recall a great deal of conversation
 14 or communication between me and Mr Jenkins.
 15 **Q.** Right. I'm moving on to a different topic now. The
 16 receipts and payments mismatch bug, when did you first
 17 hear of that bug?
 18 **A.** I'm not sure what you're referring to.
 19 **Q.** On 12 December 2023, when answering my questions,
 20 Mr Wilson said that he and Mr Jarnail Singh and
 21 Ms Juliet McFarlane became aware of the receipts and
 22 payments mismatch bug on 8 October 2010. You know that
 23 Mrs Misra's trial began on 11 October 2010.
 24 **A.** Mm.
 25 **Q.** I asked Mr Wilson what he did in respect of that

112

1 information and he said this:
 2 "I think what I did was I spoke to Jon Longman."
 3 Did he?
 4 **A.** I don't recall that. I don't recall. I'm not familiar
 5 with what you've just mentioned. So he said he thinks
 6 he mentioned it to me but I've got no recollection of
 7 a conversation about it. That's not to say that
 8 I didn't but it doesn't ring any bells.
 9 **Q.** I see. "I think what I did was I spoke to Jon Longman";
 10 you're not saying these lying, are you?
 11 **A.** I'm saying I don't know.
 12 **Q.** So you're prepared to accept that what he said is
 13 potentially correct?
 14 **A.** It might be right, it might be wrong. That's all I can
 15 say.
 16 **Q.** All right. You were surely -- I mean, Gareth Jenkins,
 17 he was aware, we know this -- he was aware of the
 18 receipts and payments mismatch bug. Did you discuss
 19 that with him?
 20 **A.** No, not that I can recall.
 21 **Q.** It wasn't disclosed in Mrs Misra's trial, the existence
 22 of an important bug: the receipts and payments mismatch
 23 bug was not disclosed in Mrs Misra's trial. Was that
 24 deliberate?
 25 **A.** Not on my part, no, because I don't think I was aware of
 113

1 was summarised I thought there was a further two
 2 statements containing the full raw data that those --
 3 I'm sure it was disclosed to the defence.
 4 **Q.** Her calls to the helpline were effectively censored to
 5 remove complaints about the Horizon system. Was that
 6 anything to do with you?
 7 **A.** No.
 8 **Q.** ARQ data was not provided in an unfiltered state but was
 9 culled and didn't cover the indictment period. Was that
 10 anything to do with you?
 11 **A.** No, as previously explained, that was -- I had asked for
 12 the full three years of data, but it was refused on
 13 costs grounds.
 14 **Q.** No examination of that data for bugs, errors and defects
 15 or to justify evidence of theft. Was that anything to
 16 do with you?
 17 **A.** No.
 18 **Q.** No evidence to corroborate the Horizon evidence. You
 19 were the Investigator and Disclosure Officer: was that
 20 anything to do with you?
 21 **A.** Well, to identify any bugs with Horizon, we would have
 22 been relying on Fujitsu. So -- to analyse the data that
 23 was provided, which was one year. So I wouldn't be able
 24 to identify a bug or a glitch in the system.
 25 **Q.** So what are you apologising for because you don't appear
 115

1 it.
 2 **Q.** Look, I'm now going to ask you, what did you do wrong in
 3 Seema Misra's case?
 4 **A.** Well, at the time, I didn't think I'd done anything
 5 wrong but, obviously, since the Inquiry, it seems that
 6 the disclosure of other potential Horizon integrity
 7 issues should have been made known to the defence.
 8 **Q.** Right. You stated, of course, at page 42, paragraph 86
 9 of your statement, it appeared, at least, that you'd
 10 read the *Hamilton* judgment and you had no regrets. So
 11 I just want to now go through some evidence that we've
 12 heard in the Inquiry and also the Court of Appeal's
 13 findings, very quickly.
 14 First of all, you did not ensure that full and
 15 accurate records of her calls to the helpline were
 16 disclosed and presented at her trial; do you accept
 17 that?
 18 **A.** Is this to the Fujitsu helpline you're referring to?
 19 **Q.** Yes.
 20 **A.** A CD containing it was, I thought, exhibited by Mr Dunks
 21 to the defence.
 22 **Q.** It was summarised Mr Longman. That CD. They were
 23 summarised in ways which left out significant technical
 24 problems. Did that have anything to do with you?
 25 **A.** Well, no, but I thought the actual raw -- although it
 114

1 to be accepting responsibility for any of the matters
 2 I put to you?
 3 **A.** Well, I'm apologising because, with hindsight, maybe
 4 I should have been a bit more forceful with trying to
 5 get this disclosure to the defence and realising that,
 6 where there were previous cases where there are
 7 unexplained losses, that these should also have been
 8 made available to the defence.
 9 **Q.** Right. Well, last topic about hindsight. We've seen
 10 your statement, which was POL00054041, dated 5 February
 11 2010. I don't want to put it up on the screen but you
 12 said at the bottom of page 1, going over to page 2:
 13 "I have never experienced any problems with the
 14 Horizon system other than pressing the wrong icon",
 15 et cetera, et cetera.
 16 You were trying to insinuate the reliability of
 17 Horizon, weren't you?
 18 **A.** I was trying to explain that when I used the system I'd
 19 had no problems, although my involvement with using
 20 Horizon was very limited to Christmas pressure time or
 21 when there was strike action. That's all I was doing.
 22 **Q.** I see. At the time you signed that statement, you had
 23 information about Mrs O'Dell's case and Mr Hosi's case,
 24 didn't you?
 25 **A.** Yes.
 116

- 1 Q. Mrs O'Dell, you knew she hadn't committed theft and
2 neither had her family; you said that and you also said
3 that she'd made numerous calls to the helpline telling
4 them everything in the five months before she was
5 audited. So you knew all about Mrs O'Dell's case and
6 the decision not to prosecute because you knew, didn't
7 you, that there was no basis to prosecute?
8 A. Yes, I wasn't happy with being given that case.
9 I really wasn't.
10 Q. Yes, and, if an unjust decision to prosecute had been
11 made, it was highly likely you'd lose with massive and
12 embarrassing publicity undermining the myth of Horizon,
13 correct?
14 A. I didn't think a prosecution should take place because
15 she'd been refused the transaction log data and that is
16 a clear case where that should have gone to Fujitsu for
17 investigation.
18 Q. It was out and out, as you said this morning, to do with
19 the system. Your words.
20 A. Sorry?
21 Q. You said this morning "It was out and out to do with the
22 system", in other words the system was at fault, in your
23 view, looking at all of the evidence.
24 A. What in Mrs O'Dell's case?
25 Q. Yes.

117

- 1 help. You should have disclosed both cases to
2 Mrs Misra's team, shouldn't you?
3 A. With hindsight, yes.
4 Q. You should have revised your statement of the 5 February
5 before her trial in October, shouldn't you?
6 A. To reflect this thing?
7 Q. Yes.
8 A. Yes.
9 Q. What I'm going to ask you to do in conclusion is to tell
10 the truth. There was no inclination to investigate
11 unexplained losses or shortfalls on behalf of SPMs, was
12 there?
13 A. Well, there was, in terms of -- it probably wasn't as
14 thorough as it should have been. As I say in my
15 statement, it would always be Fujitsu who would say --
16 who would need to analyse all the transaction log data,
17 and not an Investigator, because they would have far
18 greater knowledge of the systems, to see whether there
19 was a glitch or a bug.
20 Q. You and your colleagues, with the advice and counsel
21 I suggest, of the Criminal Law Team, did not wish to
22 investigate anything that might undermine Horizon's
23 infallibility or might assist the subpostmasters. What
24 do you say to that?
25 A. I would say that our training was to put in -- to

119

- 1 A. I couldn't say the system was at fault but we hadn't
2 done enough in that case to prove one way or another and
3 as we hadn't done anything about to enquire about the
4 workings of Horizon, I felt it was a bit of an unjust
5 case.
6 Q. You said this morning, sir, "Out and out, it's the
7 system. It should have been further investigated".
8 A. Yes, that's right.
9 Q. But it wasn't investigated, I suggest, because you knew,
10 together with Mr Singh, that you'd get the wrong answer;
11 isn't that right?
12 A. No, not at all.
13 Q. So it was swept under the carpet, wasn't it?
14 A. No. The transaction log data wasn't provided. With
15 hindsight, I should have been more forceful and said we
16 need transaction log data and this should go to Fujitsu
17 for analysis of any bugs or glitches.
18 Q. Mr Hosi, you knew about his case as well because you,
19 together with Mrs Allen, had interviewed him, correct?
20 A. I only knew about it when I saw the additional documents
21 and it was from some time ago. You don't always
22 particularly remember somebody else's case.
23 Q. He'd made multiple calls to the helpline in the five
24 months, again, coincidentally, five months before he was
25 audited and he had even urgently asked for face-to-face

118

- 1 investigate, put in an offender report and, you know,
2 and see what the reply was from Legal Services. If it
3 was for further enquiries, then we would undertake that.
4 But, yes, looking back, more work should have been done,
5 where unexplained losses had occurred. But it wasn't
6 part of our training, it wasn't part of our thinking at
7 the time, if I can put it that way.
8 Q. There was institutional bias to do precisely the
9 opposite of what you ought to have done, wasn't there?
10 A. Yes, I can't disagree. We should have -- there should
11 have been more enquiries with Fujitsu in a lot more
12 cases than what actually did occur, I think. I don't
13 know how many cases Fujitsu have actually looked at for
14 glitches and bugs but it's clear now, looking back, that
15 there should have been more cases referred to them for
16 analysis.
17 **MR HENRY:** Nothing further. Thank you.
18 **SIR WYN WILLIAMS:** Thank you, Mr Henry.
19 Mr Stein?

Questioned by MR STEIN

- 21 **MR STEIN:** Mr Longman, I represent Jennifer O'Dell. I'm
22 going to take you straight to a document, please, which
23 is POL00105147. Thank you. Could you go, please, to
24 page 6 of that document. Thank you.
25 Now, in your evidence today, you've said this, that

120

1 in relation to Mrs O'Dell's case you said that "It was
2 the one case that was allocated to me when I think I did
3 speak to a manager or someone else saying why had this
4 been passed over to us?" You made a variety of other
5 comments about this case, saying essentially that you
6 felt that there was something wrong with it. All right?

7 So can we have a look at what you said in relation
8 to matters going back to 2010. So under the words
9 "Legal", there's then:

10 "... Trading Accounts to show a balance. Mrs O'Dell
11 was unable to offer an explanation that made any sense
12 as to why multiple cash declarations were made in
13 December 2009."

14 Then she is referred to as being adamant about the
15 losses as a result of discrepancies in the system and
16 you're aware and will recall, giving evidence today,
17 about Mrs O'Dell repeatedly contacting the helpline,
18 trying to get some assistance in this matter, where you
19 have also said today that she wasn't helped by the
20 helpline, okay?

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

22 **Q.** All right. Okay. So let's have a look at the last few
23 lines of that paragraph under "Legal", okay?

24 It says this:

25 "If charges of false accounting are to be
121

1 in there.

2 **Q.** Let's go to another document if we can, please. The
3 document is POL00143570. Thank you. Go to the bottom
4 of the first page, please. Now, this document is
5 a correspondence between yourself and Jarnail Singh.
6 This is from Mr Singh to you and it says this, at the
7 bottom there:

8 "The circumstances of the facts will cause
9 difficulties in prosecuting this case and the Business
10 will come under grave criticism which the Defence will
11 exploit as can be seen in recent prosecution cases."

12 Mr Longman, can you help us understand why on earth
13 is the question of the business coming under criticism
14 anything to do with whether someone should or should not
15 be prosecuted?

16 **A.** Well, it shouldn't. It shouldn't apply. That was
17 written by Mr Singh, so it shouldn't have been a factor,
18 no.

19 **Q.** Was the reputational question that related to Post
20 Office as a business something that intruded into
21 considerations as to prosecutions?

22 **A.** I would say no. Not on --

23 **Q.** Go to the bottom of the second page, please. Now, here,
24 Mr Singh is saying this, that, in his view, a caution
25 should be administered in this case.
123

1 considered, then section 1 of the Fraud Act 2006 would
2 seem the most appropriate."

3 Now, Mr Longman, for someone that is concerned about
4 a case as to why it's been allocated to your team and
5 about someone who has made a number of complaints to the
6 helpline with no help from the helpline, why are you
7 even considering the possibility of an allegation of
8 false accounting against Mrs O'Dell?

9 **A.** I suppose there was -- there still was 10,000 or close
10 to 10,000 missing and false accounting had been done, by
11 her own admission. But, with hindsight and looking at
12 it now, I should have marked it as "no further action",
13 or something to that effect, I accept that.

14 **Q.** It's not with hindsight, Mr Longman. That's why
15 I pointed out your evidence earlier. You have said
16 already at the time you thought there was something
17 wrong with this case.

18 **A.** Yes.

19 **Q.** But you're going around suggesting that they might want
20 to consider false accounting against Mrs O'Dell. How on
21 earth does that make any sense, Mr Longman?

22 **A.** Well, all I can say is that there was an amount of money
23 that was missing and there was -- well, I accept your
24 point. I -- it should have been -- it should have been
25 "no further action" and that line should not have been
122

1 **A.** Yes.

2 **Q.** Now, you've said there's something wrong with this case,
3 you've agreed with me, you wish you hadn't written
4 something about the possibility of false accounting.
5 What on earth was going on that Mr Singh is proposing
6 a caution in relation to a case that you thought frankly
7 was wrong?

8 **A.** Well, yeah, between me and Mr Singh, I think it -- yeah,
9 it should have been, as I say, the case should have been
10 looked at and no further action.

11 **Q.** Did you ever consider Mrs O'Dell's background, in that
12 she'd used to work for HM Prison Service in a clerical
13 role, she'd worked for the Cambridgeshire Police at
14 their headquarters in the control room answering 999
15 calls and she'd worked at a Housing Association in her
16 time and, at the time of these matters being
17 investigated, she was seeking to run as a Parliamentary
18 candidate. Did any of those matters ever come into your
19 head when thinking about what on earth has happened here
20 with this poor lady who is making repeat at the time
21 complaints to a system that doesn't answer her question?

22 **A.** Well, I wasn't aware of -- I was aware of some of what
23 you just said but, you know --

24 **Q.** Lastly, Mr Longman, when investigating this matter, if
25 that's the right word to use, did you once pull aside
124

1 her son Daniel, aged 20, and ask him whether he loved
2 his mother and basically suggested to him the question
3 whether his mother might have been nicking money from
4 the Post Office; do you remember doing that?

5 **A.** I remember receiving a letter from her son and we
6 interviewed him, not under caution but on a friend
7 interview. I can't remember what was said, but -- and,
8 if it was said, it wasn't in that context.

9 **MR STEIN:** Thank you, Mr Longman.

10 **MR BLAKE:** Thank you, sir. Those are all the questions for
11 Mr Longman.

12 **SIR WYN WILLIAMS:** Thank you, Mr Longman, for making
13 a detailed witness statement and for answering the
14 questions put to you by a variety of people today. I'm
15 grateful to you for participating in the Inquiry.

16 **THE WITNESS:** Thank you.

17 **MR BLAKE:** Thank you, sir.

18 We're going to have a very quick change around, so
19 if I could ask everybody to remain seated.

20 **SIR WYN WILLIAMS:** That doesn't include you, Mr Longman.

21 You are now free to go, so to speak, all right?

22 **THE WITNESS:** Thank you, Sir Wyn.

23 *(Pause)*

24 **MR STEVENS:** Sir, can you see and hear me?

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

125

1 you wish to make, page 20, paragraph 38.

2 **A.** That's correct. It's the third up from the bottom. It
3 says, "I note from POL00095531 that in August 2005", it
4 should actually read October 2008.

5 **Q.** That should be October 2008, thank you. Can we please
6 turn to page 30 of your statement. Is that your
7 signature?

8 **A.** Yes, it is.

9 **Q.** Subject to that one clarification that you've just made,
10 are the contents of the statement true to the best of
11 your knowledge and belief?

12 **A.** They after.

13 **Q.** Thank you, Mr Leighton. That stands as your evidence to
14 the Inquiry. The witness statement will be published on
15 the website shortly. I'm going to ask you some
16 questions on it but, before I do, I understand you wish
17 to say a few words?

18 **A.** Yes, I do. What has happened has been a terrible thing
19 for everybody who has been involved in it, particularly
20 the subpostmasters and subpostmistresses. It's
21 unbelievable that it's happened and I just wanted to say
22 that I'm sorry that the elements of that that occurred
23 while I had my tenure at the Royal Mail, I'm sorry for
24 that happening.

25 **Q.** Mr Leighton, I'll move on to my questions. Your

127

1 **MR STEVENS:** Thank you. If I can call Mr Leighton.

2 **SIR WYN WILLIAMS:** Before he is sworn, I just want to make
3 it clear to everyone that I had an appointment arranged
4 for this evening, which I have tried to change but
5 I cannot. So I'm afraid I do have to finish promptly at
6 4.30. That is not a declaration that Mr Leighton's
7 evidence has to finish by then but it is an indication
8 that, if it hasn't finished by then, he will have to
9 return at some other time which is suitable for
10 everyone.

11 **MR STEVENS:** Thank you, sir. In that case, if I may call
12 Mr Leighton now. Thank you.

13 **ALLAN LESLIE LEIGHTON (sworn)**

14 **Questioned by MR STEVENS**

15 **MR STEVENS:** Please take a seat. Mr Leighton, can I ask you
16 to state your full name.

17 **A.** Allan Leslie Leighton.

18 **Q.** Thank you for preparing your witness statement and for
19 coming to the Inquiry today to give evidence. I want to
20 start with your witness statement. It should be in
21 front of you, dated 28 February 2024?

22 **A.** Yes.

23 **Q.** Do you have that, yes? For the record, the URN is
24 WITN04380100. Before I take you to your signature,
25 I understand there's a small typographical correction

126

1 evidence today concerns the role you held whilst at
2 Royal Mail Group. Before you joined Royal Mail, your CV
3 includes being group CEO of ASDA Group Plc and,
4 following a takeover you were President and CEO of
5 Walmart Europe until November 2000?

6 **A.** That's correct.

7 **Q.** You were appointed as a Non-Executive Director of
8 Consignia Plc in April 2001?

9 **A.** Yes.

10 **Q.** Now, we'll see documents that say Consignia Plc. That
11 shortly -- well, the year after -- became Royal Mail
12 Holdings; is that correct?

13 **A.** Correct.

14 **Q.** I'm going to refer to the Group as Royal Mail. If
15 I need to, I'll distinguish Royal Mail Holdings and
16 Royal Mail Group as we go through. So after being
17 appointed a Non-Executive Director, you were appointed
18 Interim Chair of Royal Mail in January 2002?

19 **A.** That's correct.

20 **Q.** Then a permanent Chair in March 2002?

21 **A.** That's correct.

22 **Q.** Between January 2002 and April 2003, you were Chairman
23 of Post Office Limited?

24 **A.** That's correct.

25 **Q.** Could we please look at POL00021476. These are minutes

128

1 of a Board meeting of Consignia, we said Royal Mail.
 2 You attended as a Non-Executive Director, we can see, on
 3 the "Present" list. Can we turn to page 4, please. No
 4 surprise I'm not going to the "Irrelevant" part. I'm
 5 going to (h). It says:

6 "Horizon: the Board also expressed its
 7 congratulations and thanks to the team working on the
 8 Horizon programme, on the successful completion of the
 9 installation of over 40,000 machines and training of
 10 over 60,000 people in Post Office Network ..."

11 What were you told about Horizon when you joined
 12 Royal Mail?

- 13 **A.** This was in the early days of Royal Mail/Consignia as it
 14 was. Basically, I was told about the programme, the
 15 scale of the programme, the size of the programme and
 16 that this was the stage that people were at, and it was
 17 long time ago so I'm just sort of looking at the data.
 18 I think this was a stage where people felt that they put
 19 40,000 machines in and trained 60,000 people, and that
 20 had been something that warranted some congratulations
 21 to the team who'd done it.
 22 **Q.** So it was congratulations. Was there any feedback or
 23 discussion on things that had gone wrong?
 24 **A.** I, again, it's a long time ago, I don't recall that, but
 25 not that I can recall.

129

1 **Q.** Please can we turn to page 7., and to the bottom of the
 2 page, please. Thank you. So this refers to boundary
 3 and scope decisions in the context of creating Post
 4 Office Limited, noting a paper by Stuart Sweetman:
 5 "... which identified the outstanding issues of
 6 boundary and scope related to the creation of Post
 7 Office Limited under partial and total separation, along
 8 with the high level implications for Consignia and Post
 9 Office Limited ..."

10 The next one refers to:

11 "... final decisions on total separation could not
 12 be taken until the precise purpose of total separation,
 13 and associated valuation issues, were known ..."

14 So it was just an "in principle" decision. Could
 15 you briefly just summarise the background to what this
 16 decision was about?

- 17 **A.** Yeah, I think a decision had been made by the Government
 18 that actually POL -- Post Office Limited -- should be
 19 separated from the Royal Mail at some stage. It was
 20 a lot off the back of there'd been conversations when
 21 I joined of selling the Mail's business to the Dutch
 22 Post Office, as a solution to some of the modernisation
 23 costs. That conversation would entail POL, as
 24 a government-owned social responsibility, to be separate
 25 from the rest of what was then Consignia, let's call it

131

1 **Q.** Do you recall asking anyone about either the pilot,
 2 design or rollout of Horizon?

3 **A.** When I joined the organisation and, particularly -- yes,
 4 I did, and, I sort of -- I met a number of people who
 5 were in charge of the projects. I'd spent a bit of time
 6 looking outside what was happening in the Post Office,
 7 as well, and, basically, the view was it's like all big
 8 programmes. It's a massive programme, thousands of
 9 people, thousands of offices, thousands of processes
 10 and, like all those big programmes, it was moving
 11 forward but there were issues as it went and those
 12 issues were being resolved.

13 **Q.** When you say there were issues, could you describe what
 14 you were told about them?

15 **A.** No, I mean, they were just described as the normal
 16 issues that you would have when you were rolling out one
 17 of these large programmes and a lot of the conversation
 18 was about process, ie because when you changed something
 19 like this, the process change is as big as the tech
 20 change, in a strange way. A lot of it was about process
 21 and getting bedded in to using it.

22 **Q.** Did anyone say anything to you that would give rise to
 23 suspicion that the accounting data generated by Horizon
 24 may be unreliable?

25 **A.** Absolutely not.

130

1 Royal Mail, and that this, I think, is -- this is part
 2 of that piece of thinking.

3 Subsequent to that -- I think, as I say in my
 4 witness statement -- myself and a number of other
 5 directors felt that this was not a sensible thing to be
 6 selling the Royal Mail's Letters business to the Dutch
 7 at that particular time because it was unprofitable,
 8 would have had a real declination of value for the
 9 country and was saddled with industrial action issues
 10 and our view was on two fronts: one is financially this
 11 is not a sensible thing; secondly, there would have been
 12 a high degree, I think, of union unrest and industrial
 13 action, which would have been crippling for the
 14 organisation and for the country.

15 **Q.** We know that separation -- sorry, that document can come
 16 down for the time being -- didn't occur until 2012.

17 **A.** Sorry, yeah. But no, I think the other piece of this
 18 was that as planning for that separation, which some
 19 people had thought would come earlier, ie if the
 20 business was sold to the Dutch, then clearly POL would
 21 be left on its own, then this work should take place and
 22 that POL should be run slightly separately from the rest
 23 of the business anyway to get that particular focus, and
 24 the fact that, of course, it was heavily subsidised,
 25 because it was heavily loss-making, by the Government.

132

1 I think it was to really just, you know, get POL in
 2 its -- on its own in its own format, so it could be run
 3 separately if and when this sort of change took place.
 4 **Q.** So more like in more of an autonomous subsidiary than
 5 a business unit, within --
 6 **A.** Yeah, I think a bit of both but I think the idea was not
 7 for it to be a subsidiary eventually but, to start with,
 8 as we decided not to sell it to the Dutch, then it would
 9 make sense to at least go to this first stage at this
 10 stage.
 11 **Q.** Please could we bring up POL00021480. A minute of
 12 a board meeting on 26 September 2002 for Post Office
 13 Limited. This is when you were Chairman of that
 14 company. Please can we turn to page 2 of those minutes.
 15 It says under "Chairman's Business" at (a) that:
 16 "Interviews had taken place with several candidates
 17 for the position of Post Office Limited Chairman, and
 18 for Non-Executive Directors of Consignia. Consideration
 19 was also being given to the appointment of
 20 a Non-Executive Director on to the Board of Post Office
 21 Limited."
 22 Was it your responsibility to find a Chairman for
 23 Post Office Limited at this stage?
 24 **A.** Yes, because the original idea was, when I was initially
 25 recruited, is I would be the Chairman of Post Office

133

1 being withdrawn. 40 per cent of its income was going to
 2 disappear, those products needed to be replaced with
 3 something else and, to a degree, somebody who had worked
 4 in a regulated industry and, over time, had been in
 5 organisations with a number of people.
 6 **Q.** We've heard evidence of the financial position Post
 7 Office Limited was in at that time. Would you accept
 8 that there was an overwhelming priority to make Post
 9 Office Limited solvent, bring it to profitability?
 10 **A.** Well, I think solvent, I'd start with solvent. I mean,
 11 all of the businesses were in a dire strait. I mean,
 12 Post Office was losing a lot of money, the size of the
 13 network couldn't be supported with the money that there
 14 was in the organisation. It was dependent on Government
 15 money into the mix and 40 per cent, often 60 per cent of
 16 its revenue was going to disappear at some stage. So
 17 that's -- you know, that's pretty dire. That doesn't
 18 happen to many organisations and, therefore, the most
 19 important thing to start with was to get the solvency
 20 and you can see, that took a period of time.

21 And remember, the directors of the company -- that
 22 the solvency, the going concern of the Post Office, is
 23 a massive issue. But, in parallel with that, the only
 24 way that you were ever going to solve the issue was you
 25 had to have new products, you had to do something about

135

1 Limited and, as you know and as you can see, that got
 2 changed in a relatively short period of time, but it was
 3 always the idea that the Post Office should have its own
 4 Chairman and, at least, probably one independent
 5 director on its board.

6 **Q.** David Mills has given evidence to this Inquiry that --
 7 no need to turn it up -- but the effect of it was that
 8 you had been instructed by the Department for Trade and
 9 Industry to appoint an independent Chair of Post Office
 10 Limited and a Non-Executive Director; is that correct?
 11 **A.** I think "instructed" is probably a bit too far. I mean,
 12 we agreed that that was a sensible thing to do for the
 13 organisation depending on now what we decided we were
 14 likely to be and of course, obviously all those people
 15 went through the Nolan process, which is the process
 16 which the government, you know, recommend and commend,
 17 you know, people into their organisations.
 18 **Q.** When you were looking for a new Chairman and
 19 Non-Executive Director, what sort of experience and
 20 qualifications in a person were you looking for?
 21 **A.** I think two or three things, really. One, a sort of
 22 broad commercial experience. Also, helpfully, if that
 23 person had worked in, you know, consumer goods type
 24 products, because, clearly, one of the issues that was
 25 facing POL was a lot of the Government products was

134

1 the network and you had to have a system, Horizon, that
 2 enabled those changes to take place at
 3 a branch-by-branch level.

4 **Q.** When you were looking for Non-Executive Directors or
 5 chairs for the Board, did you primarily have in mind
 6 people who would be able to bring it to solvency?
 7 **A.** Well, yes but let me say you don't just bring something
 8 to solvency. The way you bring any business into
 9 a better position is, basically, you have a better
 10 business. And so, you know, the product development
 11 side of POL was really, really important, because
 12 something had to replace the products that were being
 13 taken away. So it wasn't just, you know -- solvency is
 14 not something you can just wave a flag and it appears;
 15 you have to do a series of things to get there and, one
 16 of the things to get there, is to obviously maintain
 17 your sales or grow your sales but also to try to do that
 18 in a way which is more efficient and part of the reason,
 19 I think, of Horizon, was that it was supposed to deliver
 20 the opportunity for the organisation to be more
 21 efficient in a way in which it did its business.
 22 **Q.** By 2003, that's where I want to look now, at that point
 23 Sir Michael Hodgkinson is appointed as independent
 24 chair?
 25 **A.** Yeah.

136

1 **Q.** In the same year Adam Crozier was appointed as CEO to
 2 Royal Mail, yes?
 3 **A.** Yes.
 4 **Q.** Mr Crozier, when he gave evidence, he accepted that, at
 5 that point, 2003, Post Office Limited was a subsidiary
 6 within the group that had the greatest level of
 7 autonomy, and that it was the only one with its own
 8 governance centre; would you agree with that?
 9 **A.** Yeah, I think, well, a lot of the business had autonomy,
 10 I think the idea was to try to get POL to focus on the
 11 issues that were really POL issues, rather than
 12 necessarily be influenced by what was happening in the
 13 Royal Mail. There was a lot of interaction between the
 14 two because, obviously, the two organisations were very,
 15 very connected, in terms of the mix. But the idea was
 16 to try and give a degree of independence to POL that
 17 perhaps wasn't afforded to the other pieces of the Royal
 18 Mail business.
 19 **Q.** You said that Post Office Limited should really focus on
 20 the Post Office Limited issues. What did you see the
 21 Post Office Limited issues as being?
 22 **A.** I mean, I think it -- I recall there were four big
 23 issues. I mean, the first one was this -- the revenue
 24 was disappearing. Products were going to disappear,
 25 there would be no revenue; with no revenue there's no

137

1 important thing is, when you are setting these things up
 2 and you're setting the organisation up, when you're the
 3 Non-Exec Chair, as Mike was and I was at the Royal Mail,
 4 then what you've got to make sure or try and make sure
 5 is that the structures are in place, for these things to
 6 be managed because obviously there's many, many things
 7 you're trying to manage at one time. You've got
 8 an Executive group.
 9 I mean this is -- I think people do get this, is
 10 there's a big difference between non-exec and exec.
 11 Non-execs are called non-execs because they don't
 12 execute; executives are called executives because they
 13 do execute. So our role, I think, really is to make
 14 sure the structures are in place to enable any issue in
 15 the business to be raised up the organisation. And,
 16 therefore, you've got -- you have the, you know, the
 17 Executive Management Team who are responsible do that.
 18 You've got all the meeting structures from the POL Board
 19 to the Royal Mail Board to the Audit and Risk Committee
 20 to the subcommittees of all of those organisations, to
 21 the Management Boards of those organisations that move
 22 all the time and, over time, you know, we put in this
 23 thing called Have Your Say and Have Your Say was the
 24 ability for people in the organisation at all levels to
 25 say what they were feeling about the business. So were

139

1 business. So there's a massive issue over how do you
 2 replace the products that are going to be disappearing?
 3 Just to scale that, you know, one thing -- the
 4 Benefits Agency, 40 per cent of the revenue. I mean,
 5 there are not many organisations that can lose 40 per
 6 cent of their revenue and survive. And, remember, this
 7 was already an organisation that was pretty much
 8 insolvent in reality. So number 1 thing is we've got to
 9 get the products right in terms of the mix.
 10 The second thing was all about the network, you
 11 know, what should the size of this network be? How much
 12 of network should be Crown how much of the network
 13 should be rural and, to a degree, negotiating with the
 14 Government as to how much they would be prepared to pay
 15 for the unprofitable parts of POL because that was
 16 obviously going to delivery a social service, for want
 17 of a better description, which is what it did.
 18 Then the third piece was really all about the
 19 implementation of the Horizon, that was the enabler, and
 20 those three things were the three critical areas,
 21 I think, that POL was focused on.
 22 **Q.** With hindsight, should added to that list be
 23 prosecutions of subpostmasters and oversight of
 24 prosecutions of subpostmasters?
 25 **A.** Well, I think in hindsight, yes. But I think the most

138

1 all those structures in place? Absolutely. And that's
 2 I think what you can do as a non-exec.
 3 What -- the execution of that, I think, as we've
 4 seen tragically, was not always what it should be.
 5 **Q.** We'll come to that shortly. Before we do, can I ask you
 6 about corporate codes. Did you apply or take into
 7 account any codes relevant to corporate governance and
 8 management when you were at Post Office Limited?
 9 **A.** I mean, in the broadest sense, yes, that's what we did.
 10 And, you know, I would say that all of the boards from
 11 a governance perspective, from a corporate governance
 12 perspective, I think were very much in line with some of
 13 that code.
 14 **Q.** Which code are you referring to?
 15 **A.** Well, I think there's a general code of how you govern
 16 an organisation. And there was -- you know, there were
 17 a lot of best practices about how you do that. A lot of
 18 us had come from organisations where that had -- you
 19 know, that was taking place. So, you know, certainly in
 20 my experience, all those businesses were set up from
 21 a governance perspective in completely the right way.
 22 **Q.** Just for clarity, are you referring to the Financial
 23 Reporting Council's Combined Code of Corporate
 24 Governance?
 25 **A.** Probably. I don't remember it in that detail.

140

- 1 **Q.** Were your expectations for the standards of corporate
2 governance in a publicly owned company, like Post Office
3 Limited, different to your expectations for a publicly
4 listed company?
- 5 **A.** I think the right answer is no, and the reason I say
6 that is I think there is only one good way to run
7 an organisation and I think you set up the governance
8 for any organisation in what you think is the right way,
9 and you get everybody to buy in to that. I think the
10 way that the governance was set up and the way the
11 organisation was run, actually made it easier for the
12 Government, as the major shareholder, to have a view of
13 what was happening in the business than probably it did
14 before.
- 15 **Q.** Can I just say, I think you prefaced the start of your
16 answer with "I think the right [response] is" and then
17 you started. Is that actually your view, that there
18 should be no difference between a particularly listed
19 and --
- 20 **A.** I think there's a subtle difference in the shareholding.
21 But I think the majority of things that you do are
22 exactly the same. I think there's, you know, there's
23 one good way of running organisations.
- 24 **Q.** Could you expand on what that subtle difference is, to
25 which you referred?

141

- 1 and agreed with the Secretary of State and the officials
2 of the DTI, that would be number 1 thing. There would
3 have been a lot of dialogue at this stage about the
4 solvency of the Post Office and a lot of conversation
5 with officials at that stage.
- 6 **Q.** How much of your discussions was directly with DTI or
7 with Shareholder Executive?
- 8 **A.** Well, it changed, as I think as you can see here.
9 I think, if I'm correct, it started off with the DTI,
10 then it moved to the Shareholder Executive.
- 11 **Q.** Yes.
- 12 **A.** So, initially, the conversations would have been the
13 DTI. Most of my conversations were with the Ministers
14 because, obviously, there'd been a plan for what should
15 happen to the Royal Mail, as I say, selling it to the
16 Dutch, and then Post Office being left behind, and run
17 in a different way, and that plan was no longer going to
18 happen. So there was a lot of discussion about, okay,
19 we'd better start again, and we already started both in
20 POL and the Royal Mail, the renewal of those companies.
- 21 **Q.** When you were discussing -- well, let's start with the
22 DTI first. When you were having discussions with DTI,
23 did you ever discuss Horizon?
- 24 **A.** Again, I honestly can't remember. It's 20 years ago.
25 So -- but I would imagine that we did. But I think it

143

- 1 **A.** I think it is just that you've got the Government as
2 a shareholder and the thing with the Government as the
3 shareholder is, you know, governments change, and so do
4 ministers, and so do civil servants. So you've got
5 more -- you're dealing with slightly more churn than you
6 probably would do in the outside world.
- 7 **Q.** When you were Chairman of Post Office Limited, to whom
8 did you consider yourself to be accountable?
- 9 **A.** Sorry?
- 10 **Q.** Who did you consider yourself to be accountable to?
- 11 **A.** To the shareholder.
- 12 **Q.** The Government?
- 13 **A.** Yeah.
- 14 **Q.** How --
- 15 **A.** And as Chairman of Royal Mail, exactly the same.
- 16 **Q.** How often did you meet Government when you were Chair of
17 Post Office Limited?
- 18 **A.** Probably -- again, I can't recall exactly but I would
19 probably -- we would probably have met Government two or
20 three times in that period of time. One of the things
21 that we set up, both in POL and the Royal Mail, was you
22 built a plan for the year and that plan was presented to
23 the Minister and his officials, and that plan was signed
24 off by them. So the whole planning of the business and
25 the business plan for the business would be signed off

142

- 1 would have been more along, you know, how's it going?
2 I don't think there would have been any detail -- there
3 certainly -- I certainly would recall any detail or
4 would think there would be any detailed conversations
5 about Horizon.
- 6 **Q.** Did you ever talk about prosecutions of subpostmasters?
- 7 **A.** Never.
- 8 **Q.** Did your discussions on either of those topics change
9 when you moved to Shareholder Executive? So in other
10 words did you --
- 11 **A.** No.
- 12 **Q.** No. David Mills was pointed to the board of Post Office
13 Limited as Chief Executive in April 2002, that's when
14 you were Chairman?
- 15 **A.** Yeah.
- 16 **Q.** What was your working relationship with the Directors of
17 Post Office Limited before David Mills assumed his
18 appointment?
- 19 **A.** Sorry, can you just repeat that?
- 20 **Q.** What was your working relationship with the directors of
21 Post Office Limited prior to David Mills' appointment?
- 22 **A.** In essence, I would talk to them on a regular basis and
23 Chair the Board meetings.
- 24 **Q.** So were you, effectively, overseeing the Executive at
25 that point?

144

- 1 A. To a degree, yes, would say.
- 2 Q. Would you accept that one of your roles as Chairman was
3 to ensure that new appointees to the board received
4 an appropriate induction?
- 5 A. Again, I think that is a combination of things between
6 the chair and the HR team, but would expect that there
7 well up some degree of induction taking place, yes.
- 8 Q. David Mills -- ooh, sorry, were you --
- 9 A. No.
- 10 Q. David Mills gave evidence to the Inquiry yesterday and
11 in his witness statement he said that he was barely
12 briefed on anything by anyone when he joined:
13 "Even the building security was not expecting me on
14 my first day. I arrived to an empty open-plan office
15 and began work."
16 Would you accept that?
- 17 A. Well, first of all, I can't recall that, it's a long
18 time ago. I had a very good working relationship with
19 David and I thought he did an extremely good job but
20 it's slightly -- I find it slightly curious that, if
21 you're going to join the Post Office as its Managing
22 Director, that you don't really have any idea about any
23 of the issues and they wouldn't have been discussed in
24 any of your interviews.
- 25 Q. When you say "any of the issues", what do you mean?
145

- 1 these all appointments that were made in 2000, in the
2 first sentence, from BSKyB, Deputy Chairman of Leeds,
3 were they all in the year 2000.
- 4 A. Yeah, I think so. I can't remember, yes.
- 5 Q. It says appointed as a Non-Executive Director to BSKyB
6 Plc?
- 7 A. Yes.
- 8 Q. Do you remember when you stood down from that role?
- 9 A. I think it says later on -- actually, I can't recall
10 exactly. Let's have look at the -- sorry, I can't
11 recall exactly on that, yeah.
- 12 Q. It says a Deputy Chairman of Leeds. That came, you say
13 came to an end in 2003?
- 14 A. Yes.
- 15 Q. Chairman of Lastminute, that stopped in 2004?
- 16 A. Yeah.
- 17 Q. Chairman of BHS, do you remember when that came to
18 an end?
- 19 A. Again, I can't quite recall, I think probably around
20 2007, or something like that.
- 21 Q. Chairman of Cannons, that came to an end in 2004?
- 22 A. Yeah.
- 23 Q. Non-Executive Director of Dyson; do you remember when
24 that came to an end?
- 25 A. 2004, it's in the witness statement.
147

- 1 A. I'm just saying, you know, I would -- certainly in the
2 interviews with David and discussion with David we'd be
3 talking about what needed to happen in the Post Office
4 Limited. But I wouldn't -- I couldn't comment on
5 whether he did or didn't get an induction program.
- 6 Q. Please could we bring up RMG00000345. This is a letter
7 to you setting out -- it says:
8 "I am writing to confirm the terms of your
9 appointment as Non-Executive Chairman."
10 We see at the top it is dated 26 November 2003,
11 which is significantly after when you were actually
12 appointed, but does this represent your settled terms of
13 appointment?
- 14 A. Yes.
- 15 Q. At 1(c), one of the terms of appointment is to spend at
16 least two days a week with the company?
- 17 A. Yes.
- 18 Q. Did you do that?
- 19 A. Absolutely.
- 20 Q. That can come down.
21 Please can we bring up the witness statement at
22 page 4, WITN04380100. If you could go to the bottom,
23 please. So you say after leaving ASDA you were
24 appointed to a number of executive roles and
25 non-executive positions, and you list these out. Were
146

- 1 Q. 2004. What were the time commitments for these roles?
- 2 A. They varied because, obviously, they're different sizes,
3 some of them are NED roles, some of them are iNED roles.
4 I think the important thing about this is that, when
5 I left ASDA, I decided I'd work full time, so I have
6 worked full time, still do, on all of my roles. And
7 full time to me is I work six days a week and I do
8 12 hours a day. So I can spend 60/70 hours a week
9 working in my organisations because I work on
10 a full-time basis, where most other chairs and NEDs do
11 not do that. And so if I then look it my commitment to
12 the Royal Mail, it was two days a week, which I see as
13 40 per cent of my time, rather than two days a week and,
14 therefore, let me be very clear, I would have spent more
15 than 40 per cent of my time on Royal Mail business the
16 whole of the time that I was chair of that organisation.
17 I work in a very different way to other people.
18 I probably would spend time nearly every day on the
19 Royal Mail or on POL, because what I don't do is sit in
20 an office and talk to people. What I try to do is get
21 out and about, and I would be in mail centres and
22 delivery offices 5.00 in the morning, 10.00 at night.
23 So I want to be very, very clear that I absolutely
24 spent the time that I required to spend on the Royal
25 Mail and on Post Office Limited. I don't take on any
148

1 roles that don't think that I can commit the time to and
 2 I think my reputation whilst in the Royal Mail was
 3 probably of the most visible and accessible Chair that
 4 there'd been. So I'm categoric about this.

5 **Q.** By my count, in 2001, you -- that's when you were
 6 appointed as a Non-Executive Director of Consignia.
 7 You're also appointed Chairman of Wilson Connolly, and
 8 Non-Executive Director of Scottish Power. That's eight
 9 other appointments outside of Consignia.

10 **A.** At that time?

11 **Q.** At that time.

12 **A.** Yeah. Then over a two-year period I reduced those by
 13 half but I want to be very categoric that I absolutely
 14 spent the time, more time than I was required to do in
 15 the Royal Mail and Post Office.

16 **Q.** Were any of those FTSE 100 companies?

17 **A.** No. Only BSKyB.

18 **Q.** BSKyB?

19 **A.** Yeah.

20 **Q.** Was Royal Mail a FTSE 100 company at the time?

21 **A.** Royal Mail? No. Royal Mail has never been a FTSE 100
 22 company until now.

23 **Q.** One of the things the Inquiry is looking into is the
 24 concept of overboarding, being on too many boards at the
 25 same time. What would you say if someone suggested that

149

1 come back to complete his evidence in due course. That
 2 cannot be tomorrow, unfortunately. But the Inquiry will
 3 liaise with his team in due course to arrange a date in
 4 the future which will be communicated to other Core
 5 Participants.

6 I hope you're content with that approach, sir,
 7 rather than seeking to rush the evidence now.

8 **SIR WYN WILLIAMS:** I certainly don't want to rush it and I'm
 9 very grateful to you, Mr Leighton, for accommodating me
 10 in effect. But I'm very sorry that I can't go on beyond
 11 4.30 today.

12 **THE WITNESS:** That's fine.

13 **MR STEVENS:** Thank you, sir.

14 On that, I will bear in mind an appropriate time to
 15 stop, considering topics but will continue with my
 16 questioning.

17 **SIR WYN WILLIAMS:** Yes, Mr Stevens, just choose a time
 18 between 4.15 onwards --

19 **MR STEVENS:** Yes.

20 **SIR WYN WILLIAMS:** -- to suit where you are, so to speak.

21 **MR STEVENS:** Thank you.

22 Mr Leighton, I want to look at risk management.
 23 Would you accept that the identification, analysis, and
 24 management of risk is an important function for the
 25 running of a business.

151

1 you were overboarded at this point?

2 **A.** I would repeat what I've just said. I worked full time,
 3 long hours, very hard and I never take on any role that
 4 I don't think I can put the time to that I need to.
 5 I still am still doing exactly the same today. 20 years
 6 on, I'm still doing exactly the same.

7 **MR STEVENS:** Sir, I appreciate we only just started the
 8 evidence but, for the transcriber we do need to take
 9 a break now. I'm going to ask is a five-minute break
 10 enough? No. It needs to be a 10-minute break, sir.

11 **SIR WYN WILLIAMS:** Sure. So what time shall we resume?

12 **MR STEVENS:** 3.30, please, sir.

13 **(3.19 pm)**

14 **(A short break)**

15 **(3.30 pm)**

16 **MR STEVENS:** Can you see and hear me?

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

18 **MR STEVENS:** Before I carry on questioning, I've looked at
 19 my note and what's left to cover and the time available
 20 and, with apologies to Mr Leighton, I don't think I can
 21 fairly finish his evidence today in the time available,
 22 and in fairness to Core Participants who may wish to ask
 23 questions too.

24 I've discussed with Mr Leighton's recognised legal
 25 representative and he has kindly agreed to arrange to

150

1 **A.** Absolutely.

2 **Q.** And it goes to the heart of the role of the executive?

3 **A.** Absolutely. And I think if you read in the Royal Mail
 4 accounts, it makes that very clear, that the major
 5 principle of risk management is with the management of
 6 the organisation.

7 **Q.** What is the Non-Executive Director or Non-Executive
 8 Chairman's role in respect of risk management?

9 **A.** To make sure that the processes are in place that enable
 10 that to happen, in terms of risk management, Audit and
 11 Risk Committee obviously are a big part of that, but
 12 also a lot of risk doesn't just come through the Audit
 13 and Risk Committee, it comes from the day-to-day
 14 interface you have with people. So the most important
 15 thing is to have some set processes, to make it clear
 16 where the responsibility lies and, again, I think you
 17 can see, certainly in the Royal Mail pieces of the
 18 report and accounts, that there were -- you know, risk
 19 management was built up from the bottom of the
 20 organisation.

21 **Q.** I want to look at Post Office Limited first. Mr Mills
 22 gave evidence to the Inquiry yesterday and his evidence
 23 was that, when he joined Post Office Limited, it did not
 24 maintain a risk register; would you agree with that?

25 **A.** I really can't recall that. It was -- you said the Post

152

1 Office Limited didn't --
 2 **Q.** Yes, Post Office Limited.
 3 **A.** I'm not aware of that and Mike Hodgkinson, when he came
 4 in, I know, set up a risk committee for the Post Office
 5 Limited but I don't know the detail underneath that.
 6 **Q.** Could you just explain what your understanding of a risk
 7 register is?
 8 **A.** Well, I probably don't think about a risk register. It
 9 is -- on risk, the way that it comes to me as
 10 a non-executive, is there's a risk report, and it
 11 identifies the major risks in the company. Today it
 12 puts some -- you know and then looks at constantly where
 13 are we with those particular risks.
 14 **Q.** So, in terms of Post Office Limited, when you say
 15 Sir Michael Hodgkinson was in post and you were
 16 Non-Executive Chair -- sorry, you were Chairman, is that
 17 what you'd get: you'd get a risk report to read?
 18 **A.** No, you wouldn't necessarily get a risk report, you'd
 19 get a report from the Risk Committee, I think that's
 20 a very different thing. So the work that was being done
 21 down the organisation, you probably wouldn't see, you'd
 22 see a summary of that in some way, shape or form, and
 23 that would also go to the audit Risk Committee of the
 24 Royal Mail.
 25 **Q.** So in terms of what -- I'm trying to summarise this --

153

1 Your major point is the heart of risk management is the
 2 management takes responsibility for identifying and
 3 managing the risks and escalating those risks where they
 4 need to.
 5 **Q.** Was there a difference between how risks was managed in
 6 Post Office Limited, as you've described, and at the
 7 Group level?
 8 **A.** I can't really recall. I doubt it. I mean, there's
 9 only one way of looking at risk and a lot of the Post
 10 Office Limited risk work would have migrated up into the
 11 Audit and Risk Committee, which looked at the whole of
 12 the Royal Mail Group not just the letters/parcels
 13 business the looked at all the risks in all the
 14 organisations.
 15 **Q.** That pre-empted my next question.
 16 **A.** Sorry.
 17 **Q.** No, not at all. We've heard evidence that at the Group
 18 level, there was an Audit and Risk Committee --
 19 **A.** Yeah.
 20 **Q.** -- and in Post Office Limited there was a Risk and
 21 Compliance Committee. Was audit a Group function?
 22 **A.** Again, I can't recall 100 per cent. I think internal
 23 audit, from what I can recall, probably was a Group
 24 function.
 25 **Q.** Why was it kept as Group function?

155

1 in terms of what you see, does that depend on people
 2 lower down the business --
 3 **A.** Absolutely.
 4 **Q.** -- identifying those risks --
 5 **A.** Absolutely.
 6 **Q.** -- and then it's filtered through to you?
 7 **A.** Yes, and, well, remember the way you build risks is
 8 bottom up, top down. So there's a top-down view of what
 9 the risk may be and then there's a bottom-up view of
 10 what the risk may be, and that's how it's put together.
 11 **Q.** What's the top-down view? How does that come into play?
 12 **A.** Well, it is that you would -- in the Audit and Risk
 13 Committee, they would have a conversation about what
 14 they felt the major risks were that were facing the
 15 company.
 16 **Q.** What, if any, steps can you take to ensure that the
 17 risks that are being identified to you are the proper
 18 ones, and there's nothing falling through the cracks?
 19 **A.** Well, two reasons. First of all, you've got not just
 20 the Audit and Risk Committee, you've got internal audit,
 21 you've got the management, you've got the executive
 22 management, you've got line management. So that whole
 23 group is involved in putting together those risks. So
 24 you pretty much imagine that that group would be cover
 25 off all the major risks that there were in the business.

154

1 **A.** I think a bit of history. I mean, the way I've thought
 2 about this is that, when the company was called Post
 3 Office, which had the Letters of every other business in
 4 it, then I think each one of the individual businesses
 5 ran the operational side of things but, actually, there
 6 was a central group, which was pretty consistent,
 7 I think on risk, on legal, on all of those things. When
 8 it moved across to Consignia and then to Royal Mail,
 9 I think that same core idea was kept in place.
 10 But you -- again, I'm not sure but I'm pretty much
 11 sure you would have people within those groups dedicated
 12 to one part of the business.
 13 **Q.** So there would be someone at the Group or in Group on
 14 audit that would be dedicated to Post Office Limited?
 15 **A.** I'm not 100 per cent sure but that's what I would sort
 16 of think would be the case.
 17 **Q.** Just so I'm clear, when you are referring to, before,
 18 when it was Post Office, that's when it was a statutory
 19 corporation?
 20 **A.** Yeah, when Post Office was what the Royal Mail became.
 21 **Q.** Yes.
 22 **A.** Yeah.
 23 **Q.** There was the change in 2001, where it became Consignia
 24 then Royal Mail?
 25 **A.** Yeah.

156

1 Q. At that point, was there ever a review or thought about
 2 where audit should sit or was it just had the continued
 3 from how it had always been?
 4 A. Again, I can't -- I mean, the honest answer is I don't
 5 know, but would imagine that it just was -- the idea was
 6 keep those central functions where they're central
 7 functions.
 8 Q. In respect of audit, do you see there being any
 9 disadvantages with audit being a Group function and not
 10 something that the subsidiary had ownership of?
 11 A. No, I mean, it's -- the issue is -- the thing about --
 12 everybody thinks it's about structure, it's not. It's
 13 about what people do. You can have any structure in the
 14 world and it will either work or it wouldn't work. What
 15 the makes it work is what people do. So whether you
 16 have a central function or a local function, they do the
 17 same thing. So I think, as long as there's some degree
 18 of focus, then it doesn't matter where it is, in
 19 reality.
 20 Q. What about for the directors on the Post Office Limited
 21 Board or the Executive Team on the Post Office Limited
 22 Board, did they have access to the group audit's staff
 23 or the group audit function?
 24 A. Well, the Chairman and CEO or MD sat on the Royal Mail
 25 Group Board, so they absolutely did. I'm not sure about

157

1 "Although I do not have specific recollections,
 2 I must have been aware at least as a general matter that
 3 the Post Office also prosecuted individuals for
 4 fraud-related offences. I would expect (although cannot
 5 recall) that there were relevant practices, guidelines
 6 and policies available in relation to the investigation
 7 of any alleged wrongdoing and subsequent criminal
 8 proceedings."
 9 When did you first become aware of the prosecution
 10 of subpostmasters for theft, fraud offences and false
 11 accounting by companies within the Royal Mail Group?
 12 A. In which way?
 13 Q. Well, when was the first time that you were aware that
 14 subpostmasters were prosecuted for those offences by
 15 a Royal Mail Group --
 16 A. When I joined the organisation.
 17 Q. How did you find that information out?
 18 A. How did I find that out? Two things: obviously as I was
 19 going to become the Chairman of POL, you know, that was
 20 the idea, then I read about POL and the history of POL
 21 and, as you know, that's been there for a long period of
 22 time. So I knew it from that perspective and then when
 23 I joined, as I say, I would have, in all probability,
 24 seen the heads of all different departments and, you
 25 know, they would have confirmed that. So something

159

1 the others. But I would imagine that they would
 2 definitely have access, if they wanted it. And t'other
 3 way round. I mean, again, the way businesses work is
 4 they don't just work up and down, the most important
 5 thing is how they work across. So there was
 6 an opportunity for anybody to have any interface with
 7 anyone in the organisation that they wanted. That's
 8 what makes structures work.
 9 Q. Could you, just before moving on, describe what the
 10 formal reporting lines were from the Post Office Limited
 11 Board to the Royal Mail Group?
 12 A. The -- as I said, that Mike Hodgkinson sat on the Royal
 13 Mail Group and reported to me, and David Mills exactly
 14 the same. Then the same with Alan Cook, except for Alan
 15 Cook reported to Adam.
 16 Q. Crozier?
 17 A. Adam Crozier.
 18 Q. With hindsight, do you think there was any lack of
 19 clarity in the Group structure that would prevent the
 20 flow of information between parent and subsidiary and
 21 vice versa?
 22 A. No. No, I don't.
 23 Q. I want to look, please, at prosecutions. Could we bring
 24 up paragraph 48 of your witness statement, which is
 25 page 25. You say:

158

1 I really knew from the beginning is the history of the
 2 organisation.
 3 Q. Were you aware that the decision of whether to prosecute
 4 someone or a subpostmaster, was made by a Royal Mail
 5 Group company?
 6 A. Yeah.
 7 Q. Were you aware that the prosecution was conducted by
 8 a Royal Mail Group company?
 9 A. Yes.
 10 Q. The Inquiry has heard evidence this week from Alan Cook,
 11 who says he was unaware that the decision was made
 12 internally and that it may have been passed to CPS or
 13 the police. What do you make of that?
 14 A. I mean, if that's Alan's recollection, it's his
 15 recollection but --
 16 Q. Did you discuss the prosecutions with Mr Cook?
 17 A. No.
 18 Q. The Royal Mail Group was involved with other types of
 19 prosecutions, other than subpostmasters for theft, fraud
 20 and false accounting; is that right?
 21 A. Yes.
 22 Q. That included things like mail theft?
 23 A. Yes.
 24 Q. To what extent did you consider that it was unusual at
 25 the time that Royal Mail Group companies were the

160

1 alleged victims of crimes, that they investigated those
2 suspected crimes themselves and then decided whether to
3 prosecute them?

4 **A.** Well, I sort of didn't see it as odd because it had
5 always been the case, you know, as far as I could see
6 from the history of the -- that's -- it's been there for
7 a -- it's always been like that, for a long time.

8 **Q.** With hindsight, do you think there are any difficulties
9 with that?

10 **A.** With hindsight, obviously, from what I know now, yes.
11 But, actually, if you step back and you say should that
12 have allowed to happen what happened? No.

13 **Q.** Sorry, can I just clarify what you mean? Is what you
14 mean that a company should be able to be in a position
15 as alleged victim, investigator and prosecutor, and
16 there still not be a miscarriage of justice?

17 **A.** Sorry, I didn't --

18 **Q.** Sorry, a bad question. Is it your view that a company
19 who is an alleged victim of crime, investigates the
20 alleged crime and then goes on to prosecute that crime,
21 that that in itself shouldn't cause the --

22 **A.** That's my point.

23 **Q.** Yes, that's what --

24 **A.** It isn't -- once again, it isn't to do with the
25 structure. That isn't the issue because, obviously,

161

1 it's because of that that it's happened; it's not, it's
2 because of people that it's happened.

3 **Q.** Do you think proper structures and processes could have
4 mitigated the chances of the scandal happening?

5 **A.** It's always in the process.

6 **Q.** So you were aware of the prosecutions. Were you aware
7 that the prosecutions of subpostmasters relied on data
8 generated by the Horizon IT System?

9 **A.** I'm not acutely aware of it but it would be obvious that
10 it would be because, obviously, that was the EPOS system
11 of the branches.

12 **Q.** On an operational level, who or which team did you think
13 was responsible for investigating suspected theft, fraud
14 or false accounting on the part of subpostmasters?

15 **A.** Again, I can't recall exactly but I would say it was in
16 that sort of Security/Legal area of the business.

17 **Q.** So we have the Security Team. Where did you think the
18 Security Team sat in the reporting line within the
19 Group?

20 **A.** Again, I can't -- I don't know exactly because I haven't
21 seen the organograms but I think my recollection is that
22 they worked into the Legal teams and that they all
23 worked into the Company Secretary.

24 **Q.** So the Legal Team, where did the Legal Team sit?

25 **A.** Again, I'm not 100 per cent sure but I think it reported

163

1 that happened for a long, long period of time before.

2 That should -- where there is a miscarriage of justice
3 or where there is data that has not been provided which
4 should have been provided, that's what's unacceptable,
5 not the process.

6 **Q.** Do you not think the position -- it's been described as
7 judge, jury and executioner, as you'll have heard
8 before.

9 **A.** Yeah.

10 **Q.** The fact there's no independence or third party
11 involvement, do you accept that the lack of
12 third-party involvement causes inherent risks in how the
13 prosecutions are run?

14 **A.** It does -- so let me -- today I don't think that should
15 happen. Today I don't believe the way that it was
16 operated should happen, and the reason I don't believe
17 it should happen is because it obviously had flaws in
18 it.

19 **Q.** Sorry, could you repeat that?

20 **A.** It obviously had flaws in the process but, if you go --
21 if I go back 20 years or -- and you say, actually, the
22 way that it was done, in the Royal Mail, which had done
23 it like that for hundreds of years, should that have
24 been a reason for the tragedy that's happened? No, it
25 shouldn't be. So I don't think people can hide behind

162

1 into the Company Secretary.

2 **Q.** The Company Secretary of which company?

3 **A.** Of Royal Mail Group.

4 **Q.** So Legal was a group function?

5 **A.** I'm pretty -- yes, I think so, yeah.

6 **Q.** Did you work with or know Tony Marsh?

7 **A.** No.

8 **Q.** Do you have any knowledge of non-formal reporting lines
9 between the Security Team and Post Office Limited?

10 **A.** Non-formal?

11 **Q.** As in -- let me rephrase that. As a matter of practice,
12 are you aware of the extent to which the Security Team,
13 which you've described, worked with people within Post
14 Office Limited?

15 **A.** Only from the documentation that I've seen.

16 **Q.** Again, at the operational level, who did you think was
17 responsible for the decision as to whether or not to
18 prosecute a subpostmaster?

19 **A.** I would have -- again, I'm not -- I have to say within
20 the Legal Team.

21 **Q.** So within Group in Legal?

22 **A.** Yeah.

23 **Q.** Who did you think was responsible for the conduct of
24 those prosecutions? Would that be Legal again?

25 **A.** Yes, I think so.

164

1 Q. Were these matters actively on your mind at the time
 2 when you were running the company?
 3 A. Not at all.
 4 Q. Why not?
 5 A. Because, obviously, there were many other things that
 6 were being addressed both -- in all of the businesses
 7 but, actually, more so, if you -- when you've got all
 8 the structures and processes in place that you think are
 9 there and there's nothing coming back that's indicating
 10 in any way, shape or form that there's some sort of
 11 systemic issue that is then resulting in these
 12 prosecutions, then nothing was ever raised of that
 13 nature, the whole time I was there.
 14 Q. You said when you've got all the structures and
 15 processes in place and then nothing comes back; how did
 16 you satisfy yourself that the structures and processes
 17 were in place in relation to prosecutions?
 18 A. Because you've put the team in place to do that.
 19 Q. Which team is that?
 20 A. It's the Legal Team and it's the Security Team and it
 21 cuts across into the Operational Teams and, you know,
 22 there's not -- there's a number of facets, as there is
 23 in every reorganisation, that there are, you know,
 24 working together on these issues. But the critical
 25 thing from a non-exec perspective, again, is the way you

165

1 11 November 2003. You're there in attendance as --
 2 well, you're Chairman of the company but not chairing
 3 the Committee.
 4 A. Yeah, I didn't normally sit on the Audit and Risk
 5 Committee. I let the Chair of that committee chair that
 6 but I would go, from time to time, when there were
 7 specific issues.
 8 Q. Looking down the attendance list, we have Jonathan
 9 Evans, Company Secretary. I think -- well, you said in
 10 your evidence earlier that your understanding is that's
 11 where Legal -- Group Legal would have reported?
 12 A. I think so. I'm not 100 per cent sure but I take
 13 a guess.
 14 Q. We've then got Derek Foster, Internal Audit and Risk
 15 Management Director. Do you recall working with him?
 16 A. No, not really at all, no. But it would be typical that
 17 the Internal Audit and Risk attended the Audit and Risk
 18 Committee.
 19 Q. Looking at the attendance list there, who, if anyone,
 20 has legal experience or legal qualifications?
 21 A. Well, I wouldn't know. I would imagine Jonathan Evans
 22 did.
 23 Q. Could we turn to page 5, please. If we can go down to
 24 the bottom of the page, please. Thank you. We have
 25 there, it says, a "Security Report". Can I start by

167

1 have to think about it -- or I have to think about it --
 2 is do you have the structures and processes in place
 3 that should enable, if there is an issue, that that
 4 issue is flagged up? As I say, you go from Board, POL
 5 Board, Royal Mail Board, Audit and Risk Committee, each
 6 management team in each one of those divisions has its
 7 own Management Board which meets every month, formally,
 8 every week off the back of it. Each one of those
 9 executives underneath that will have its own board in
 10 terms of where that mix is.
 11 You've got internal audit into the process, as well,
 12 and, to another degree, when we put in Have Your Say,
 13 you're getting -- you know, that's a facility to get
 14 feedback from the thing. So there are lots of checks
 15 and balances here that give people the opportunity to be
 16 able to flag something up. The issue was things were
 17 not flagged up.
 18 Q. I want to start looking at some of the oversight, I'm
 19 going to start at the Group level. Could we look at
 20 RMG00000006, please.
 21 A. There we go. Thank you.
 22 Q. I've heard before it wasn't possible to do that, so I'm
 23 very glad to see it was rotated. Thank you.
 24 So we have the Audit and Risk Committee of Royal
 25 Mail Holdings and this is minutes of a meeting on

166

1 asking what the security report was?
 2 A. Again, I can't 100 per cent recall but it looks as if
 3 it's a report on -- I'll just go off this, crime across
 4 the Royal Mail Group.
 5 Q. In your statement at page 25, paragraph 47, you refer to
 6 this document and you say:
 7 "I assume these figures [so the figures in paragraph
 8 (a), I think, and onwards] relate to the Royal Mail side
 9 of the business as opposed to the Post Office because it
 10 refers to Royal Mail personnel", that's in this
 11 document, and you refer to a different document there.
 12 Looking back, do you think here that the Audit and
 13 Risk Committee were looking solely at Royal Mail or was
 14 it looking at Post Office, as well?
 15 A. Well, again, it's a long time ago, so I can't recall,
 16 but it seems to me -- I mean it says, "Royal Mail
 17 personnel related crime across the business", the level
 18 of prosecutions -- I mean, I don't know 100 per cent
 19 but, when I look at this, this looks to me as if it's
 20 a Royal Mail -- it's about the Royal Mail.
 21 Q. I mean, in paragraph 44 of your witness statement you
 22 say that you don't recall any discussion during Board
 23 meetings of the prosecutions that Post Office Limited
 24 was pursuing against subpostmasters. When you say that,
 25 does that include subcommittees of the board, as well?

168

1 A. If I was involved in those subcommittees, that would
 2 involve that but at no stage did we have any real
 3 discussion about the level of prosecutions in POL. And,
 4 you know, I studied all this -- all the documents.
 5 It's -- there's nothing in here, and it --

6 Q. Just with that in mind, if you have no recollection of
 7 discussing the prosecution of subpostmasters, we have
 8 this minute where prosecutions are discussed?

9 A. Sorry, which one?

10 Q. Sorry, so we have the minute here --

11 A. This one?

12 Q. At (a), yes. Do you take it then, that this is purely
 13 to do with Royal Mail?

14 A. I can't say 100 per cent but I would -- it pretty much
 15 looks like that.

16 Q. Do you recall whether the committee at a meeting like
 17 this would have tested whether the Security Department
 18 was acting in compliance with its legal obligations
 19 arising from bringing prosecutions?

20 A. I mean, again, I wouldn't -- I couldn't recall that.

21 Q. Is that you can't recall, or --

22 A. No, I can't recall.

23 Q. Please could we bring up RMG00000008, please. It's
 24 another Audit and Risk Committee meeting of Royal Mail
 25 Holdings. We can see at the top there you're in

169

1 100 per cent, where I think, undercover reporters had
 2 gone into a mail centre or a delivery office and had
 3 shown, you know, bad activity, and I think including the
 4 mail theft. So when I read this, again, I can't recall,
 5 it's like 20 years ago, but it does mention the
 6 Dispatches programme and I would hazard a guess that
 7 this was reported off the back of that.

8 Q. Again, to the best of your recollection, this is talking
 9 about Royal Mail, rather than Post Office?

10 A. Yeah. I can't be 100 per cent but I'm -- when I read
 11 it, it looks like that.

12 SIR WYN WILLIAMS: Mr Leighton, if that's right -- and I'm
 13 not trying to dispute that with you for the moment --
 14 would you have expected that there would be similar
 15 Security reports dealing exclusively with Post Office
 16 Limited to the Post Office Board?

17 A. I think the answer is -- I'm not sure, sir, and the
 18 reason I say that is that most of this audit work and
 19 reports came up to the Royal Mail Group Board. What
 20 I would have expected, if there was a concern in any
 21 way, shape or form, that that would have come to the
 22 Royal Mail Group Board and to the Post Office Board.

23 SIR WYN WILLIAMS: I follow what you say but my thought
 24 process was a bit more straightforward. If it was
 25 thought appropriate to report to Royal Mail that there

171

1 attendance?

2 A. Yeah.

3 Q. Can we turn, please, to page 6. Down to "Protecting
 4 Royal Mail Assets", thank you:
 5 "Andrew Wilson, Director of Security, attended for
 6 this item."
 7 Do you remember Andrew Wilson?

8 A. Not clearly.

9 Q. "The Committee noted that Royal Mail was inherently
 10 vulnerable as a business to attacks on its assets,
 11 whether through fraud or other events. This is due to
 12 the scale of the business, nature and the core handling
 13 process and liquidity of assets ...
 14 "(a) the key activity of the business in protecting
 15 Royal Mail's assets and pipeline, including increased
 16 focus on fraud investigations, protection of information
 17 and the level of prosecutions."
 18 Do you have any recollection of what was discussed
 19 at this meeting?

20 A. No, I think it's 20-odd years ago. When I read it,
 21 this, I think, may be in response to the Dispatches
 22 programme that there'd just been, which it refers to in
 23 (a).

24 Q. Yes. So what was the Dispatches programme?

25 A. There was a Dispatches programme, I can't remember it

170

1 had been 399 prosecutions in a particular year, that's
 2 the correct figure, wouldn't it have been equally
 3 appropriate to report to the Post Office that Post
 4 Office had prosecuted 100 people, or whatever it was?

5 A. When you put it like that, yes.

6 SIR WYN WILLIAMS: Right. It's just that I've not seen it
 7 yet -- I may be shown it -- but minutes members of the
 8 Post Office Board which provide that sort of
 9 information.

10 A. And I agree with you because, I think, if that
 11 information had been available then I think that would
 12 have helped. And I think I reflect that in my witness
 13 statement at the end of the conversation. We may talk
 14 about that later.

15 MR STEVENS: Yes, we will come on to that.

16 Sorry, sir, do you have any further questions before
 17 I --

18 SIR WYN WILLIAMS: I'm sorry to have interrupted but the
 19 thought popped into my head, so to speak, because you
 20 were questioning Mr Leighton about this, so I thought
 21 I'd clarify it while I could.

22 MR STEVENS: Of course. Thank you, sir.

23 Mr Leighton, is it fair to say that the Audit
 24 Committee here is exercising oversight of the
 25 investigation and prosecution of crime affecting Royal

172

1 Mail?

2 **A.** Well, that's what it looks like.

3 **Q.** Do you think at any point it exercised oversight or

4 control over the investigation and prosecution of crime

5 affecting Post Office Limited?

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

7 **Q.** In your mind at the time, if you can, where did you

8 think responsibility for the oversight of the

9 investigation and prosecution of crime affecting Post

10 Office Limited fell?

11 **A.** It fell into Legal and Security and, therefore, that

12 reported in to the Company Secretary.

13 **Q.** So for that reason, why -- can you explain why we

14 haven't seen minutes of the Audit Committee of the Royal

15 Mail Holdings -- sorry, I'll start again.

16 The Company Secretary attended the Audit and Risk

17 Committee of the Royal Mail Holdings Board?

18 **A.** Yeah.

19 **Q.** Why was the Audit and Risk Committee of the Royal Mail

20 Holdings Board not exercising oversight of the

21 investigation and prosecution of crimes that affected

22 Post Office Limited, if that was reporting through the

23 Company Secretary?

24 **A.** Sorry, I don't --

25 **Q.** Let's take it in stages. You say that Jonathan Evans,

173

1 we've got almost eight years worth of data. If you look

2 over that eight years worth of data, the reporting on

3 prosecutions across the whole of the group, I think

4 there are two or three papers, two or three in the whole

5 of that period of time. So what it says to me, when

6 I step back and look at it, is, if this is the landscape

7 of seven or eight years and in this landscape there are

8 a couple of Audit Committees where they're talking about

9 losses and prosecutions, then it seems to me that, in

10 the organisation, these two things were not seen as

11 significant. That's what this says to me.

12 **Q.** Can I ask: why was there not a General Counsel role on

13 the Group board?

14 **A.** I mean, I looked at this, in my experience, and

15 obviously I've chaired some large companies, that the

16 General Counsel tends not to sit on the Board. You

17 know, certainly in the organisations I've chaired, the

18 counsel, General Counsel, legal counsel, are not Board

19 members, so that's the first thing. So, for me, it

20 would not be unusual that there's a General Counsel or

21 legal counsel who does not sit on the Board of the

22 organisation. It's not always the case and certainly,

23 in my experience, it's the opposite.

24 **Q.** Is that the same in respect of attendance at Audit and

25 Risk Committee? Would you expect a General Counsel to

175

1 the Company Secretary, that's the line of report for

2 Legal?

3 **A.** That's what I think. I'm not 100 per cent, as I said to

4 you.

5 **Q.** You said earlier that you thought the decision to

6 prosecute and the investigation of offences,

7 responsibility for that lay with Legal --

8 **A.** Yes.

9 **Q.** -- at Group level?

10 **A.** Yes.

11 **Q.** We see that the Audit and Risk Committee of the Royal

12 Mail Holdings Group are exercising oversight of the

13 prosecution of offences affecting Royal Mail, yes?

14 **A.** Yes, but their oversight is on the Royal Mail and POL

15 and Parcels. The Royal Mail Audit Committee's oversight

16 is across all of the elements of the business.

17 **Q.** Yes, so that's my question. Why, in those

18 circumstances, was the Audit and Risk Committee not

19 exercising the same type of oversight we see here in

20 respect of prosecution of crime that was affecting Post

21 Office Limited?

22 **A.** That I don't know.

23 **Q.** Is that a failure in the process?

24 **A.** Is it a failure in the process? I mean, when I look at

25 all of the papers, actually, the reporting -- I mean

174

1 attend the Audit and Risk Committee?

2 **A.** If the -- it all depends on what -- if the General --

3 what's confusing in this is I think Jonathan Evans is --

4 obviously sits at every single one of these meetings all

5 the time. It appears that everything reports in to him,

6 so, provided there is somebody from Legal at those

7 meetings, I think that's fine. What I can't see is,

8 further down the organisation, where the legal counsel

9 fitted in to some of the other set piece plays, for want

10 of a better description.

11 **MR STEVENS:** Sir, it is a touch early but I'm confident the

12 next line of questioning will take longer than

13 20 minutes. So I propose this as a time to bring

14 today's proceedings to a close, if you're content with

15 that.

16 I think you're on mute, sir.

17 **SIR WYN WILLIAMS:** Yes, I'm sorry, Mr Leighton, that this

18 means you have to return but I'm grateful for your

19 indulgence. Normally, if a witness doesn't complete

20 their evidence on a given day, they are asked not to

21 discuss that evidence with others until it is completed

22 but I think, in your case, that's unrealistic -- if you

23 want to, that is -- particularly since we don't actually

24 know when you're going to return.

25 So there is no embargo upon you discussing the

176

1 evidence you've given but I would encourage you not to.
 2 Can I put it in that way?
 3 **THE WITNESS:** You can, sir.
 4 **SIR WYN WILLIAMS:** Right. I think we're starting at 9.45
 5 tomorrow, is that right, Mr Stevens?
 6 **MR STEVENS:** Yes, that's correct sir, we're hearing from
 7 Rodric Williams.
 8 **SIR WYN WILLIAMS:** Fine. So 9.45 tomorrow, thank you.
 9 **MR STEVENS:** Thank you.
 10 **(4.11 pm)**
 11 **(The hearing adjourned until 9.45 am the following day)**
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I N D E X

JONATHAN LONGMAN (sworn)	1
Questioned by MR BLAKE	1
Questioned by MS OLIVER	103
Questioned by MR HENRY	110
Questioned by MR STEIN	120
ALLAN LESLIE LEIGHTON (sworn)	126
Questioned by MR STEVENS	126

<p>MR BLAKE: [19] 1/3 1/5 1/11 11/15 53/10 53/13 53/15 53/19 53/21 96/12 96/18 96/21 102/24 103/3 103/7 103/9 103/17 125/10 125/17</p> <p>MR HENRY: [2] 110/13 120/17</p> <p>MR STEIN: [2] 120/21 125/9</p> <p>MR STEVENS: [16] 125/24 126/1 126/11 126/15 150/7 150/12 150/16 150/18 151/13 151/19 151/21 172/15 172/22 176/11 177/6 177/9</p> <p>MS OLIVER: [2] 103/19 110/8</p> <p>SIR WYN WILLIAMS: [31] 1/4 1/8 10/23 11/6 11/14 53/12 53/14 53/20 96/16 96/20 103/2 103/8 103/16 110/10 120/18 125/12 125/20 125/25 126/2 150/11 150/17 151/8 151/17 151/20 171/12 171/23 172/6 172/18 176/17 177/4 177/8</p> <p>THE WITNESS: [4] 125/16 125/22 151/12 177/3</p> <hr/> <p>'08 [1] 71/23 '09 [1] 71/23 'drains [1] 86/13 'experts' [1] 58/11 'fishing' [1] 77/14 'for [1] 72/23 'is' [1] 49/7 'lost' [1] 105/6 'lumpy' [1] 57/15 'manage' [1] 86/11 'stayed' [1] 24/19</p> <hr/> <p>1</p> <p>1 February [3] 17/20 18/3 66/7</p> <p>1.10 [2] 96/19 103/4</p> <p>10 [5] 47/21 68/11 68/14 97/9 97/12</p> <p>10,000 [2] 122/9 122/10</p> <p>10.00 [2] 1/2 148/22</p> <p>10.30 [1] 64/20</p> <p>100 [13] 149/16 149/20 149/21 155/22 156/15 163/25 167/12</p>	<p>168/2 168/18 169/14 171/10 172/4 174/3</p> <p>100 per [2] 29/21 171/1</p> <p>100 per cent [1] 50/11</p> <p>107 [4] 55/11 60/8 60/11 61/22</p> <p>11 [2] 69/14 69/18</p> <p>11 March [1] 20/22</p> <p>11 November [1] 167/1</p> <p>11 October [1] 112/23</p> <p>11.26 [1] 53/16</p> <p>11.45 [2] 53/13 53/18</p> <p>12 [2] 12/14 97/7</p> <p>12 December [1] 112/19</p> <p>12 hours [1] 148/8</p> <p>12.00 [1] 81/15</p> <p>12/13-year [1] 12/22</p> <p>13 years [1] 12/14</p> <p>14 August 2008 [1] 3/10</p> <p>14 January [1] 3/11</p> <p>14 July [1] 56/5</p> <p>14 June [1] 28/10</p> <p>14 June 2010 [1] 26/18</p> <p>15 July [1] 37/19</p> <p>15 September [1] 96/23</p> <p>15,000 [2] 23/25 32/17</p> <p>16 November [1] 65/7</p> <p>16.40 [1] 39/17</p> <p>17 [1] 1/1</p> <p>18 [1] 5/7</p> <p>19 July [1] 84/6</p> <hr/> <p>2</p> <p>2 July [1] 39/4</p> <p>2-3 [1] 61/24</p> <p>2.00 [2] 103/1 103/6</p> <p>20 [2] 125/1 127/1</p> <p>20 minutes [1] 176/13</p> <p>20 years [4] 143/24 150/5 162/21 171/5</p> <p>20-odd [1] 170/20</p> <p>200,000 [3] 77/12 77/23 107/23</p> <p>2000 [6] 4/11 15/12 15/14 128/5 147/1 147/3</p> <p>2001 [3] 128/8 149/5 156/23</p> <p>2002 [5] 128/18 128/20 128/22 133/12 144/13</p> <p>2003 [6] 128/22 136/22 137/5 146/10</p>	<p>147/13 167/1</p> <p>2004 [4] 147/15 147/21 147/25 148/1</p> <p>2005 [1] 127/3</p> <p>2005/2006 [1] 15/13</p> <p>2006 [6] 15/13 15/22 17/1 47/20 52/9 122/1</p> <p>2007 [2] 79/13 147/20</p> <p>2008 [5] 3/10 3/11 52/10 127/4 127/5</p> <p>2009 [16] 19/5 27/10 27/14 28/5 32/5 32/6 55/8 55/17 56/5 59/15 60/3 60/6 64/16 71/17 71/18 121/13</p> <p>2010 [48] 3/21 14/8 15/23 16/2 18/3 20/3 20/23 23/18 26/4 26/18 28/10 31/18 37/20 40/5 42/21 42/23 44/13 52/10 66/7 69/22 69/23 71/16 71/20 73/15 74/9 75/11 77/18 78/21 79/19 80/9 82/10 83/1 84/6 84/6 87/20 88/7 90/9 91/1 91/22 92/8 92/23 104/1 104/24 108/15 112/22 112/23 116/11 121/8</p> <p>2011 [7] 4/15 20/2 93/3 93/9 93/23 96/23 101/17</p> <p>2012 [2] 4/15 132/16</p> <p>2012/early [1] 4/13</p> <p>2013 [1] 4/14</p> <p>2016 [1] 4/21</p> <p>2023 [2] 1/14 112/19</p> <p>2024 [2] 1/1 126/21</p> <p>21 July [1] 81/15</p> <p>22 October [1] 89/20</p> <p>22 October 2010 [1] 91/1</p> <p>23 [1] 66/20</p> <p>24 [1] 2/11</p> <p>25 [2] 158/25 168/5</p> <p>26 [1] 5/25</p> <p>26 November [1] 146/10</p> <p>26 September [1] 133/12</p> <p>27 [1] 3/8</p> <p>27 July 2010 [1] 108/15</p> <p>28 February [1] 126/21</p> <p>28 January [1] 14/8</p> <p>29 January [2] 104/1 105/15</p> <hr/> <p>3</p> <p>3.19 [1] 150/13</p>	<p>3.30 [2] 150/12 150/15</p> <p>30 [2] 103/10 127/6</p> <p>30 November [1] 65/7</p> <p>31 [1] 56/16</p> <p>35 [1] 38/10</p> <p>36 years [1] 4/5</p> <p>37 [1] 6/8</p> <p>38 [3] 5/7 5/12 127/1</p> <p>39 [2] 3/14 5/7</p> <p>399 [1] 172/1</p> <hr/> <p>4</p> <p>4.11 [1] 177/10</p> <p>4.15 [1] 151/18</p> <p>4.30 [2] 126/6 151/11</p> <p>40 [4] 6/18 6/19 135/1 138/5</p> <p>40 per cent [4] 135/15 138/4 148/13 148/15</p> <p>40,000 [3] 51/1 129/9 129/19</p> <p>40,000-odd [1] 50/23</p> <p>41 [1] 11/16</p> <p>42 [3] 8/5 11/16 114/8</p> <p>430,000 [1] 74/15</p> <p>44 [1] 168/21</p> <p>46 [3] 6/25 33/22 33/24</p> <p>47 [2] 1/19 168/5</p> <p>48 [1] 158/24</p> <hr/> <p>5</p> <p>5 February [4] 44/13 71/16 116/10 119/4</p> <p>5 March [1] 80/9</p> <p>5 years [1] 23/23</p> <p>5.00 [1] 148/22</p> <p>53 [2] 2/6 2/10</p> <p>54 [4] 2/6 2/8 2/10 2/21</p> <p>56 [1] 6/1</p> <p>58 [1] 3/7</p> <hr/> <p>6</p> <p>6 April [1] 74/8</p> <p>6 July [1] 31/18</p> <p>6 October [1] 82/10</p> <p>6-8 [1] 61/21</p> <p>60 [1] 56/19</p> <p>60 per cent [1] 135/15</p> <p>60,000 [2] 129/10 129/19</p> <p>60/70 [1] 148/8</p> <p>64 [1] 3/7</p> <p>670 [1] 56/17</p> <hr/> <p>7</p> <p>7 October [1] 3/21</p> <p>70 [1] 148/8</p>	<p>70,000 [4] 48/21 49/2 49/4 49/4</p> <p>70,000-odd [1] 48/13</p> <p>71 [2] 6/8 13/7</p> <p>76 [2] 3/13 3/15</p> <p>77 [2] 6/18 6/19</p> <hr/> <p>8</p> <p>8 February [1] 104/24</p> <p>8 November [1] 1/14</p> <p>8 October [1] 112/22</p> <p>86 [4] 8/6 10/25 11/8 114/8</p> <hr/> <p>9</p> <p>9.45 [3] 177/4 177/8 177/11</p> <p>95 per cent [1] 29/6</p> <p>97 [4] 6/25 7/2 33/23 33/24</p> <p>999 [1] 124/14</p> <hr/> <p>A</p> <p>ability [3] 33/11 95/16 139/24</p> <p>able [26] 11/17 21/13 30/8 51/7 51/19 52/2 52/5 61/14 64/6 64/10 73/2 79/1 79/5 79/6 79/24 80/3 80/16 81/12 83/9 88/12 93/8 112/1 115/23 136/6 161/14 166/16</p> <p>about [149] 4/4 8/15 9/9 10/2 11/2 13/2 15/9 15/18 16/7 16/21 17/5 17/6 17/11 20/18 24/11 25/9 25/12 25/18 26/4 26/7 31/13 34/21 35/5 37/9 38/1 38/9 39/8 39/12 40/2 40/3 40/6 41/3 41/6 42/6 42/23 44/19 46/12 48/14 49/2 49/25 50/23 51/12 51/14 51/16 51/24 52/19 59/21 59/25 60/4 60/14 63/8 64/8 64/24 68/6 68/10 69/10 73/21 74/3 74/5 76/3 77/11 77/19 77/24 77/25 78/15 78/17 79/13 79/21 79/22 80/1 80/4 81/13 81/22 84/4 85/1 85/18 92/20 92/20 95/4 98/1 98/3 98/12 100/13 102/22 104/3 106/3 106/10 106/19 108/8 109/1 109/5 109/6 111/12 113/7 115/5 116/9 116/23 117/5 118/3 118/3 118/18</p>
--	---	---	---	---

A	accumulated [1] 51/6	Adjournment [1] 103/5	78/10 105/24 137/8 152/24 172/10	121/2 122/4
about... [48] 118/20 121/5 121/14 121/17 122/3 122/5 124/4 124/19 129/11 129/14 130/1 130/14 130/18 130/20 131/16 135/25 138/10 138/18 139/25 140/6 140/17 143/3 143/18 144/5 144/6 145/22 146/3 148/4 148/21 149/4 153/8 154/13 156/2 157/1 157/11 157/12 157/13 157/20 157/25 159/20 166/1 166/1 168/20 169/3 171/9 172/14 172/20 175/8	accumulating [1] 27/19	administered [2] 33/9 123/25	agreed [9] 23/19 79/10 81/20 83/4 94/25 124/3 134/12 143/1 150/25	allowance [1] 56/17 allowed [1] 161/12 almost [1] 175/1 along [7] 12/1 47/16 80/7 102/16 108/11 131/7 144/1
above [6] 23/11 40/25 62/17 84/13 86/19 87/14	accuracy [2] 41/20 56/8	administrative [2] 14/14 14/16	agreement [1] 72/5	already [10] 29/7 29/9 33/23 47/17 49/5 60/16 62/3 122/16 138/7 143/19
absolutely [14] 2/4 69/21 82/7 100/19 130/25 140/1 146/19 148/23 149/13 152/1 152/3 154/3 154/5 157/25	accurate [2] 41/7 114/15	admission [1] 122/11	ahead [1] 21/5	also [46] 5/2 6/2 14/13 19/24 20/10 22/1 28/12 31/7 31/20 32/2 32/16 36/21 37/16 42/23 44/23 54/20 54/25 55/24 56/18 62/1 72/20 73/7 74/4 74/11 81/6 84/18 86/12 87/23 89/20 98/19 100/4 100/12 104/4 111/24 114/12 116/7 117/2 121/19 129/6 133/19 134/22 136/17 149/7 152/12 153/23 159/3
abuse [1] 21/3	accused [2] 13/16 51/18	admitted [1] 54/11	Alan [3] 158/14 158/14 160/10	although [7] 43/19 45/16 61/10 114/25 116/19 159/1 159/4
accept [14] 34/14 49/13 65/24 71/25 74/23 113/12 114/16 122/13 122/23 135/7 145/2 145/16 151/23 162/11	achieved [1] 36/24	advice [14] 6/4 6/5 20/16 35/9 57/18 62/11 64/2 67/4 67/11 70/13 73/4 104/9 106/10 119/20	Alan's [1] 160/14	always [17] 20/20 37/7 40/17 51/25 52/6 65/22 66/11 101/25 118/21 119/15 134/3 140/4 157/3 161/5 161/7 163/5 175/22
acceptable [1] 65/20	acquire [1] 57/7	advise [1] 62/2	alarming [1] 60/22	am [14] 1/2 5/9 24/20 33/15 53/16 53/18 58/23 67/19 73/1 74/22 96/16 146/8 150/5 177/11
acceptance [1] 66/16	across [8] 53/3 156/8 158/5 165/21 168/3 168/17 174/16 175/3	advised [2] 80/23 81/15	albeit [2] 43/9 45/25	amendment [3] 2/5 2/12 3/12
accepted [3] 41/2 63/11 137/4	Act [3] 28/8 39/23 122/1	affect [4] 39/17 41/20 43/11 43/20	alerted [1] 19/1	amongst [1] 85/19
accepting [1] 116/1	acted [1] 2/15	affecting [5] 172/25 173/5 173/9 174/13 174/20	all [121] 9/23 11/3 11/10 11/14 11/21 21/1 21/4 23/22 29/3 29/13 41/19 42/21 44/2 52/15 53/2 53/5 57/1 57/24 58/14 59/5 63/7 63/22 64/7 64/8 64/9 65/15 67/25 68/19 68/25 70/9 70/10 71/14 74/18 74/23 77/4 77/9 77/10 78/1 80/8 80/19 83/25 83/25 84/12 85/11 88/4 88/20 89/22 91/20 93/22 96/4 96/10 96/20 97/21 98/25 99/4 101/13 101/17 101/24 102/4 102/15 103/2 105/2 105/20 107/21 107/22 107/25 108/4 110/8 111/8 111/15 112/7 113/14 113/16 114/14 116/21 117/5 117/23 118/12 119/16 121/6 121/22 122/22 125/10 125/21 130/7 130/10 134/14 135/11 138/10 138/18 139/18 139/20 139/22 139/24 140/1 140/10 140/20 145/17 147/1 147/3 148/6 154/19 154/25 155/13 155/13 155/17 156/7 159/23 159/24 163/22 165/3 165/6 165/7 165/14 167/16 169/4 169/4 174/16 174/25 176/2 176/4	am [14] 1/2 5/9 24/20 33/15 53/16 53/18 58/23 67/19 73/1 74/22 96/16 146/8 150/5 177/11
access [9] 75/15 75/22 76/24 83/19 98/8 100/7 107/9 157/22 158/2	action [8] 40/22 65/16 116/21 122/12 122/25 124/10 132/9 132/13	afforded [1] 137/17	amendment [3] 2/5 2/12 3/12	amount [9] 36/24 62/7 72/2 72/9 72/11 73/24 74/24 98/2 122/22
accessible [1] 149/3	actioned [3] 9/23 9/25 10/1	affected [7] 40/11 42/24 43/13 43/19 43/21 43/22 173/21	analyse [3] 56/7 115/22 119/16	analysed [2] 49/23 50/10
accommodate [1] 97/5	actions [1] 8/12	affecting [5] 172/25 173/5 173/9 174/13 174/20	analysis [14] 28/14 72/1 80/13 80/17 80/25 81/2 82/24 83/4 83/11 83/13 83/15 118/17 120/16 151/23	analyst [1] 66/19
accommodating [1] 151/9	actively [1] 165/1	affords [1] 7/7	amendment [3] 2/5 2/12 3/12	Andrew [9] 55/9 62/4 84/9 85/11 85/21 85/22 85/23 170/5 170/7
account [3] 32/20 56/23 140/7	activity [2] 170/14 171/3	afforded [1] 137/17	amongst [1] 85/19	Andy [1] 87/1
accountable [2] 142/8 142/10	actual [4] 40/11 78/6 94/11 114/25	afraid [5] 15/25 73/1 82/3 106/24 126/5	amount [9] 36/24 62/7 72/2 72/9 72/11 73/24 74/24 98/2 122/22	Ann [2] 91/23 92/9
accountant [1] 56/7	actually [26] 16/11 24/7 25/14 28/15 36/9 41/14 43/20 54/15 60/17 75/1 80/20 110/6 120/12 120/13 127/4 131/18 141/11 141/17 146/11 147/9 156/5 161/11 162/21 165/7 174/25 176/23	after [12] 3/18 10/17 26/18 28/5 77/13 79/12 93/10 127/12 128/11 128/16 146/11 146/23	analysis [14] 28/14 72/1 80/13 80/17 80/25 81/2 82/24 83/4 83/11 83/13 83/15 118/17 120/16 151/23	Anne [9] 14/22 15/20
accounting [17] 22/9 22/11 22/13 28/7 31/22 66/15 67/2 91/23 121/25 122/8 122/10 122/20 124/4 130/23 159/11 160/20 163/14	ad [2] 77/23 80/8	afternoon [4] 21/7 96/15 103/7 103/19	analyst [1] 66/19	
accounts [7] 27/11 83/3 83/14 83/22 121/10 152/4 152/18	added [5] 22/10 41/21 42/13 42/16 138/22	again [41] 9/11 13/4 16/24 35/24 43/4 49/24 50/5 50/15 70/11 73/17 79/8 99/19 108/1 109/13 110/4 118/24 129/24 142/18 143/19 143/24 145/5 147/19 152/16 155/22 156/10 157/4 158/3 161/24 163/15 163/20 163/25 164/16 164/19 164/24 165/25 168/2 168/15 169/20 171/4 171/8 173/15	analysis [14] 28/14 72/1 80/13 80/17 80/25 81/2 82/24 83/4 83/11 83/13 83/15 118/17 120/16 151/23	
	addition [1] 42/21	against [4] 70/11 122/8 122/20 168/24	analyst [1] 66/19	
	additional [7] 2/14 16/3 16/24 24/15 42/8 62/3 118/20	aged [1] 125/1	Andrew [9] 55/9 62/4 84/9 85/11 85/21 85/22 85/23 170/5 170/7	
	Additionally [1] 61/22	aged 20 [1] 125/1	Andy [1] 87/1	
	address [1] 42/2	Agency [1] 138/4	Ann [2] 91/23 92/9	
	addressed [2] 42/4 165/6	agent [1] 92/12	Anne [9] 14/22 15/20	
	addresses [3] 72/12 100/4 100/11	Agents [1] 91/23		
	adequate [1] 94/18	ago [8] 118/21 129/17 129/24 143/24 145/18 168/15 170/20 171/5		
	adjourned [2] 66/6 177/11	agree [13] 29/12 49/24 51/25 62/24 62/25 70/2 70/3 70/20		
		agreed [9] 23/19 79/10 81/20 83/4 94/25 124/3 134/12 143/1 150/25		
		admission [1] 122/11		
		admitted [1] 54/11		
		advice [14] 6/4 6/5 20/16 35/9 57/18 62/11 64/2 67/4 67/11 70/13 73/4 104/9 106/10 119/20		
		advise [1] 62/2		
		advised [2] 80/23 81/15		
		affect [4] 39/17 41/20 43/11 43/20		
		affected [7] 40/11 42/24 43/13 43/19 43/21 43/22 173/21		
		affecting [5] 172/25 173/5 173/9 174/13 174/20		
		affects [1] 7/7		
		afforded [1] 137/17		
		afraid [5] 15/25 73/1 82/3 106/24 126/5		
		after [12] 3/18 10/17 26/18 28/5 77/13 79/12 93/10 127/12 128/11 128/16 146/11 146/23		
		afternoon [4] 21/7 96/15 103/7 103/19		
		again [41] 9/11 13/4 16/24 35/24 43/4 49/24 50/5 50/15 70/11 73/17 79/8 99/19 108/1 109/13 110/4 118/24 129/24 142/18 143/19 143/24 145/5 147/19 152/16 155/22 156/10 157/4 158/3 161/24 163/15 163/20 163/25 164/16 164/19 164/24 165/25 168/2 168/15 169/20 171/4 171/8 173/15		
		against [4] 70/11 122/8 122/20 168/24		
		aged [1] 125/1		
		aged 20 [1] 125/1		
		Agency [1] 138/4		
		agent [1] 92/12		
		Agents [1] 91/23		
		ago [8] 118/21 129/17 129/24 143/24 145/18 168/15 170/20 171/5		
		agree [13] 29/12 49/24 51/25 62/24 62/25 70/2 70/3 70/20		
		agreed [9] 23/19 79/10 81/20 83/4 94/25 124/3 134/12 143/1 150/25		
		admission [1] 122/11		
		admitted [1] 54/11		
		advice [14] 6/4 6/5 20/16 35/9 57/18 62/11 64/2 67/4 67/11 70/13 73/4 104/9 106/10 119/20		
		advise [1] 62/2		
		advised [2] 80/23 81/15		
		affect [4] 39/17 41/20 43/11 43/20		
		affected [7] 40/11 42/24 43/13 43/19 43/21 43/22 173/21		
		affecting [5] 172/25 173/5 173/9 174/13 174/20		
		affects [1] 7/7		
		afforded [1] 137/17		
		afraid [5] 15/25 73/1 82/3 106/24 126/5		
		after [12] 3/18 10/17 26/18 28/5 77/13 79/12 93/10 127/12 128/11 128/16 146/11 146/23		
		afternoon [4] 21/7 96/15 103/7 103/19		
		again [41] 9/11 13/4 16/24 35/24 43/4 49/24 50/5 50/15 70/11 73/17 79/8 99/19 108/1 109/13 110/4 118/24 129/24 142/18 143/19 143/24 145/5 147/19 152/16 155/22 156/10 157/4 158/3 161/24 163/15 163/20 163/25 164/16 164/19 164/24 165/25 168/2 168/15 169/20 171/4 171/8 173/15		
		against [4] 70/11 122/8 122/20 168/24		
		aged [1] 125/1		
		aged 20 [1] 125/1		
		Agency [1] 138/4		
		agent [1] 92/12		
		Agents [1] 91/23		
		ago [8] 118/21 129/17 129/24 143/24 145/18 168/15 170/20 171/5		
		agree [13] 29/12 49/24 51/25 62/24 62/25 70/2 70/3 70/20		
		agreed [9] 23/19 79/10 81/20 83/4 94/25 124/3 134/12 143/1 150/25		
		admission [1] 122/11		
		admitted [1] 54/11		
		advice [14] 6/4 6/5 20/16 35/9 57/18 62/11 64/2 67/4 67/11 70/13 73/4 104/9 106/10 119/20		
		advise [1] 62/2		
		advised [2] 80/23 81/15		
		affect [4] 39/17 41/20 43/11 43/20		
		affected [7] 40/11 42/24 43/13 43/19 43/21 43/22 173/21		
		affecting [5] 172/25 173/5 173/9 174/13 174/20		
		affects [1] 7/7		
		afforded [1] 137/17		
		afraid [5] 15/25 73/1 82/3 106/24 126/5		
		after [12] 3/18 10/17 26/18 28/5 77/13 79/12 93/10 127/12 128/11 128/16 146/11 146/23		
		afternoon [4] 21/7 96/15 103/7 103/19		
		again [41] 9/11 13/4 16/24 35/24 43/4 49/24 50/5 50/15 70/11 73/17 79/8 99/19 108/1 109/13 110/4 118/24 129/24 142/18 143/19 143/24 145/5 147/19 152/16 155/22 156/10 157/4 158/3 161/24 163/15 163/20 163/25 164/16 164/19 164/24 165/25 168/2 168/15 169/20 171/4 171/8 173/15		
		against [4] 70/11 122/8 122/20 168/24		
		aged [1] 125/1		
		aged 20 [1] 125/1		
		Agency [1] 138/4		
		agent [1] 92/12		
		Agents [1] 91/23		
		ago [8] 118/21 129/17 129/24 143/24 145/18 168/15 170/20 171/5		
		agree [13] 29/12 49/24 51/25 62/24 62/25 70/2 70/3 70/20		
		agreed [9] 23/19 79/10 81/20 83/4 94/25 124/3 134/12 143/1 150/25		
		admission [1] 122/11		
		admitted [1] 54/11		
		advice [14] 6/4 6/5 20/16 35/9 57/18 62/11 6		

A	114/24 115/6 115/10 115/15 115/20 118/3 119/22 123/14 130/22 145/12	24/24 26/3 27/8 27/14 28/7 38/3 42/13 42/16 44/10 46/21 48/1 49/11 50/3 50/15 50/16 51/18 56/11 57/9 57/13 57/13 57/22 58/20 59/12 61/13 62/8 63/6 66/13 67/24 68/20 68/25 70/22 73/2 73/6 75/16 77/4 79/5 80/16 83/9 84/16 85/4 85/9 86/8 86/13 86/15 86/19 89/5 90/20 93/7 98/15 98/16 98/22 102/14 104/4 104/5 105/15 105/21 105/23 112/7 113/10 115/25 116/6 121/25 122/6 125/10 125/21 127/10 128/25 138/2 138/5 139/1 139/5 139/11 139/12 139/14 139/17 140/14 140/22 141/21 148/3 148/3 151/20 152/9 152/11 153/13 154/17 154/17 156/17 161/8 162/13 164/12 165/8 165/23 166/14 169/8 174/12 175/4 175/7 175/18 176/20	22/22 22/24 22/25 26/7 52/13 articles [1] 77/25 as [231] ASDA [3] 128/3 146/23 148/5 aside [2] 58/9 124/25 ask [24] 1/18 2/7 10/24 31/13 46/12 49/9 50/16 78/17 100/13 101/6 103/19 108/4 108/21 109/17 114/2 119/9 125/1 125/19 126/15 127/15 140/5 150/9 150/22 175/12 asked [28] 21/11 23/25 29/5 32/22 51/11 62/10 63/19 63/23 63/24 63/24 65/9 66/3 70/14 72/19 75/5 79/15 93/12 97/18 105/11 109/16 111/4 111/11 111/12 112/12 112/25 115/11 118/25 176/20 asking [12] 4/3 36/21 50/6 52/6 75/25 76/21 77/9 79/9 105/17 107/20 130/1 168/1 assets [4] 170/4 170/10 170/13 170/15 assist [22] 4/23 11/17 17/2 21/13 28/10 44/13 57/9 61/14 66/22 70/4 73/2 79/5 80/16 81/13 83/9 83/20 93/8 93/13 95/6 95/16 111/4 119/23 assistance [6] 27/21 29/17 45/7 81/9 83/11 121/18 assisted [2] 6/5 82/23 assisting [2] 16/25 97/15 associated [1] 131/13 Association [1] 124/15 assume [1] 168/7 assumed [1] 144/17 assured [1] 19/8 at [324] at page 3 [1] 20/23 at page 42 [1] 8/5 atmosphere [1] 73/14 attach [1] 40/25 attacks [1] 170/10 attempt [3] 36/11 62/22 65/13 attempted [1] 82/14 attempts [1] 58/12	attend [1] 176/1 attendance [5] 167/1 167/8 167/19 170/1 175/24 attended [4] 129/2 167/17 170/5 173/16 attending [1] 64/20 attention [3] 10/6 20/4 41/16 attributed [2] 2/16 2/23 audit [49] 27/1 27/22 28/4 32/7 38/8 39/13 40/14 40/15 40/17 41/6 43/14 43/22 50/20 139/19 152/10 152/12 153/23 154/12 154/20 154/20 155/11 155/18 155/21 155/23 156/14 157/2 157/8 157/9 157/23 166/5 166/11 166/24 167/4 167/14 167/17 167/17 168/12 169/24 171/18 172/23 173/14 173/16 173/19 174/11 174/15 174/18 175/8 175/24 176/1 audit's [1] 157/22 audited [4] 32/6 40/10 117/5 118/25 auditing [2] 40/13 42/24 Auditor [1] 50/22 Auditors [1] 50/21 August [6] 3/10 28/5 32/5 60/10 71/23 127/3 August 2009 [1] 32/5 authorise [1] 56/15 authority [3] 5/22 9/23 57/19 automatically [1] 40/18 autonomous [1] 133/4 autonomy [2] 137/7 137/9 available [9] 11/25 12/10 80/14 104/18 116/8 150/19 150/21 159/6 172/11 Avenue [2] 16/19 17/14 awaiting [1] 83/7 aware [75] 6/3 10/6 13/11 13/15 15/5 15/7 15/11 16/1 16/9 18/21 19/14 19/23 20/14 23/1 23/4 25/1 25/5 26/11 32/19 33/11 33/13 37/6 37/17 42/9 44/1 44/4 54/12 57/21 62/14 73/21 77/1 77/4
----------	--	---	--	---

A
aware... [43] 78/16
 79/11 79/20 84/23
 85/18 89/6 90/4 90/8
 90/10 90/12 90/22
 91/1 91/12 91/13
 91/14 92/10 94/15
 98/20 101/23 102/2
 102/10 104/5 109/21
 109/24 110/3 110/24
 112/21 113/17 113/17
 113/25 121/16 124/22
 124/22 153/3 159/2
 159/9 159/13 160/3
 160/7 163/6 163/6
 163/9 164/12
away [4] 44/5 63/14
 84/20 136/13

B
back [47] 15/11
 15/14 16/25 20/16
 24/9 25/23 30/2 32/24
 33/14 33/22 34/4 34/7
 35/3 41/11 41/14 45/8
 45/19 52/7 52/19
 52/23 53/13 60/2 63/1
 65/20 68/18 70/13
 72/3 75/8 78/20 81/21
 96/13 100/24 103/1
 110/2 120/4 120/14
 121/8 131/20 151/1
 161/11 162/21 165/9
 165/15 166/8 168/12
 171/7 175/6
back-up [1] 68/18
background [3] 4/4
 124/11 131/15
backing [1] 39/15
bad [3] 22/7 161/18
 171/3
Bailey [2] 91/23 92/9
balance [3] 27/11
 51/5 121/10
balances [1] 166/15
balancing [1] 27/25
bandwagon [3]
 88/17 88/19 89/2
barely [1] 145/11
barrier [1] 63/25
barriers [1] 64/13
barrister [6] 14/19
 20/13 22/18 24/11
 35/2 35/9
based [3] 84/17 85/5
 92/14
bashing [3] 88/17
 88/19 89/1
basically [7] 58/23
 77/9 107/20 125/2
 129/14 130/7 136/9
basis [4] 110/19
 117/7 144/22 148/10

Bayfield [1] 69/8
be [231]
bear [1] 151/14
bearing [1] 7/16
became [9] 11/24
 15/7 19/23 101/9
 110/23 112/21 128/11
 156/20 156/23
because [76] 21/3
 22/4 24/12 29/6 29/11
 29/16 29/23 30/6
 30/14 30/19 30/20
 30/21 31/1 32/23
 34/12 35/13 35/17
 36/1 36/3 36/9 36/12
 42/17 43/7 43/10
 45/10 48/5 48/23 49/9
 58/6 58/10 62/18
 63/10 63/14 67/3
 87/19 91/7 93/14 98/5
 110/4 111/3 111/5
 113/25 115/25 116/3
 117/6 117/14 118/9
 118/18 119/17 130/18
 132/7 132/25 133/24
 134/24 136/11 137/14
 138/15 139/6 139/11
 139/12 143/14 148/2
 148/9 148/19 161/4
 161/25 162/17 163/1
 163/2 163/10 163/20
 165/5 165/18 168/9
 172/10 172/19
become [3] 12/10
 159/9 159/19
becoming [1] 102/10
bedded [1] 130/21
been [199]
before [32] 11/24
 17/24 19/21 27/22
 29/9 32/5 32/7 40/19
 51/7 65/14 68/20 72/5
 81/4 94/12 110/2
 117/4 118/24 119/5
 126/2 126/24 127/16
 128/2 140/5 141/14
 144/17 150/18 156/17
 158/9 162/1 162/8
 166/22 172/16
began [3] 102/2
 112/23 145/15
begin [1] 44/8
beginning [2] 65/5
 160/1
behalf [5] 28/2 85/24
 103/11 103/20 119/11
behind [3] 82/19
 143/16 162/25
being [45] 19/11
 19/25 24/5 25/2 26/11
 29/5 32/20 34/8 36/20
 40/2 40/14 43/14
 49/17 50/11 51/18
 64/12 65/22 77/19

78/16 83/16 87/10
 88/1 94/9 95/25
 105/21 109/9 111/15
 117/8 121/14 124/16
 128/3 128/16 130/12
 132/16 133/19 135/1
 136/12 137/21 143/16
 149/24 153/20 154/17
 157/8 157/9 165/6
belief [3] 1/24 23/4
 127/11
believe [17] 2/1 7/3
 7/18 18/12 34/1 39/6
 43/1 47/24 48/1 48/5
 48/9 48/12 51/1 77/7
 87/10 162/15 162/16
believes [1] 54/8
bells [1] 113/8
belongs [1] 48/2
below [3] 20/11
 72/18 86/25
Benefits [1] 138/4
beset [1] 88/11
best [6] 1/23 44/12
 73/18 127/10 140/17
 171/8
better [6] 8/21 136/9
 136/9 138/17 143/19
 176/10
between [26] 6/21
 7/7 10/2 10/5 57/12
 65/23 74/25 75/9
 75/13 92/24 106/21
 110/15 110/17 110/18
 112/14 123/5 124/8
 128/22 137/13 139/10
 141/18 145/5 151/18
 155/5 158/20 164/9
beyond [1] 151/10
BHS [1] 147/17
bias [1] 120/8
big [7] 99/19 130/7
 130/10 130/19 137/22
 139/10 152/11
biggie [1] 97/4
bit [22] 4/3 5/17 8/21
 23/20 45/17 47/21
 65/4 76/15 78/17
 89/16 94/2 94/14 98/5
 101/9 108/15 116/4
 118/4 130/5 133/6
 134/11 156/1 171/24
BLAKE [4] 1/10
 10/23 96/17 178/4
blamed [2] 26/25
 34/8
blaming [2] 92/6
 92/16
board [33] 129/1
 129/6 133/12 133/20
 134/5 136/5 139/18
 139/19 144/12 144/23
 145/3 157/21 157/22
 157/25 158/11 166/4

166/5 166/5 166/7
 166/9 168/22 168/25
 171/16 171/19 171/22
 171/22 172/8 173/17
 173/20 175/13 175/16
 175/18 175/21
boards [3] 139/21
 140/10 149/24
bold [2] 42/13 42/17
borne [1] 66/17
both [7] 24/4 72/1
 119/1 133/6 142/21
 143/19 165/6
bottom [34] 5/25 6/1
 6/10 16/19 17/20
 20/23 25/16 26/23
 26/24 27/3 37/20 38/2
 41/17 56/3 71/2 77/8
 80/10 84/8 91/22 93/5
 94/7 95/2 108/19
 116/12 123/3 123/7
 123/23 127/2 131/1
 146/22 152/19 154/8
 154/9 167/24
boundary [2] 131/2
 131/6
branch [8] 26/5
 27/10 50/10 83/3
 83/14 83/22 136/3
 136/3
branches [1] 163/11
Brander [1] 86/24
break [7] 53/11 53/17
 103/13 150/9 150/9
 150/10 150/14
brief [1] 78/8
briefed [1] 145/12
briefing [1] 86/7
briefings [1] 84/19
briefly [5] 31/23
 45/25 50/15 101/4
 131/15
bring [11] 95/9
 133/11 135/9 136/6
 136/7 136/8 146/6
 146/21 158/23 169/23
 176/13
bringing [1] 169/19
broad [1] 134/22
broadest [1] 140/9
brought [4] 2/7 10/6
 18/25 20/3
brushed [1] 10/4
BSkyB [4] 147/2
 147/5 149/17 149/18
bug [28] 7/13 7/14
 7/16 8/1 8/2 15/5 15/6
 15/19 16/11 34/16
 35/18 35/22 36/1 36/2
 36/4 36/9 49/14 49/15
 49/15 80/2 112/16
 112/17 112/22 113/18
 113/22 113/23 115/24
 119/19

bugs [11] 14/4 16/9
 31/11 36/14 37/17
 101/24 102/4 115/14
 115/21 118/17 120/14
build [1] 154/7
building [4] 51/2
 94/19 94/22 145/13
built [2] 142/22
 152/19
bullet [1] 75/17
bundle [1] 2/14
burden [4] 37/1 37/3
 37/14 46/25
business [48] 23/4
 23/7 32/10 35/4 35/15
 57/11 59/2 84/4 87/22
 90/20 97/13 100/2
 100/23 123/9 123/13
 123/20 131/21 132/6
 132/20 132/23 133/5
 133/15 136/8 136/10
 136/21 137/9 137/18
 138/1 139/15 139/25
 141/13 142/24 142/25
 142/25 148/15 151/25
 154/2 154/25 155/13
 156/3 156/12 163/16
 168/9 168/17 170/10
 170/12 170/14 174/16
businesses [5]
 135/11 140/20 156/4
 158/3 165/6
but [211]
buy [1] 141/9
Byfleet [15] 3/9 7/14
 7/17 8/23 15/1 15/10
 17/9 41/9 59/20 64/21
 71/5 87/16 91/25
 105/11 106/1

C
call [4] 50/19 126/1
 126/11 131/25
called [11] 14/21
 18/3 54/12 54/16 74/1
 77/19 84/9 139/11
 139/12 139/23 156/2
Callendar [18] 14/21
 15/5 15/9 15/13 15/15
 16/10 26/5 42/21
 52/11 66/18 66/19
 72/20 77/25 78/25
 79/3 80/1 82/21 104/3
calls [17] 55/11
 55/13 55/16 59/21
 60/8 60/11 60/17
 60/21 61/22 61/24
 62/4 74/19 114/15
 115/4 117/3 118/23
 124/15
Cambridgeshire [1]
 124/13
came [19] 18/24 53/3
 58/14 63/10 70/11

C				
came... [14] 90/13 99/10 99/12 102/22 111/5 111/11 111/17 147/12 147/13 147/17 147/21 147/24 153/3 171/19	29/23 30/3 30/14 30/18 31/4 31/18 32/10 32/17 32/23 33/9 33/15 34/2 34/4 34/5 34/5 34/6 34/7 34/12 34/15 34/23 35/2 35/2 36/1 36/3 36/6 40/25 41/1 42/1 42/10 43/2 43/3 44/9 44/17 47/16 50/11 52/22 53/23 54/10 63/5 66/11 66/22 66/22 66/25 67/5 67/10 67/20 67/22 69/7 69/10 71/10 76/12 76/17 77/4 78/22 81/5 81/20 81/25 84/17 84/19 84/23 85/5 85/8 86/11 87/17 87/20 87/21 88/10 88/15 89/8 89/16 89/23 90/10 90/13 90/15 90/17 90/22 90/24 91/2 91/5 91/7 91/13 91/14 91/25 92/9 92/22 92/22 94/8 102/17 102/21 103/23 105/11 106/1 111/21 111/22 114/3 116/23 116/23 117/5 117/8 117/16 117/24 118/2 118/5 118/18 118/22 121/1 121/2 121/5 122/4 122/17 123/9 123/25 124/2 124/6 124/9 126/11 156/16 161/5 175/22 176/22	cause [7] 15/6 32/9 43/6 46/16 46/21 123/8 161/21 caused [2] 27/16 47/10 causes [1] 162/12 causing [2] 29/25 49/22 caution [8] 33/8 33/10 33/12 33/17 33/18 123/24 124/6 125/6 CD [2] 114/20 114/22 censored [1] 115/4 cent [20] 29/6 29/21 50/11 135/1 135/15 135/15 138/4 138/6 148/13 148/15 155/22 156/15 163/25 167/12 168/2 168/18 169/14 171/1 171/10 174/3 central [4] 156/6 157/6 157/6 157/16 centre [2] 137/8 171/2 centres [1] 148/21 CEO [5] 40/23 128/3 128/4 137/1 157/24 certain [7] 10/24 37/7 37/11 37/13 73/9 101/9 110/4 certainly [10] 53/14 55/24 140/19 144/3 144/3 146/1 151/8 152/17 175/17 175/22 cetera [2] 116/15 116/15 chain [8] 3/18 38/2 70/22 72/12 84/7 84/8 84/13 94/6 chair [13] 128/18 128/20 134/9 136/24 139/3 142/16 144/23 145/6 148/16 149/3 153/16 167/5 167/5 chaired [2] 175/15 175/17 chairing [1] 167/2 Chairman [22] 128/22 133/13 133/17 133/22 133/25 134/4 134/18 142/7 142/15 144/14 145/2 146/9 147/2 147/12 147/15 147/17 147/21 149/7 153/16 157/24 159/19 167/2 Chairman's [3] 23/7 133/15 152/8 chairs [2] 136/5 148/10 challenge [12] 7/3 7/11 7/19 8/2 16/6 18/15 18/22 34/2	58/12 86/15 99/9 111/7 challenged [2] 25/2 98/18 challenges [30] 7/21 16/8 19/2 19/18 19/25 24/23 25/3 25/4 25/6 25/10 25/12 25/18 26/15 77/1 86/10 86/11 87/9 89/5 90/4 93/6 93/9 94/22 94/25 97/10 101/18 102/3 102/4 102/10 110/24 111/6 challenging [7] 16/1 20/5 20/19 56/8 89/10 94/16 97/13 Chambers [7] 14/22 15/20 15/21 79/12 79/16 79/21 79/23 chances [1] 163/4 change [14] 38/9 77/8 78/2 107/9 107/20 109/22 125/18 126/4 130/19 130/20 133/3 142/3 144/8 156/23 changed [3] 130/18 134/2 143/8 changes [9] 3/5 3/22 107/25 107/25 108/9 109/7 110/1 112/1 136/2 charge [8] 22/3 22/10 24/19 25/7 25/11 25/11 69/2 130/5 charges [3] 22/9 28/7 121/25 charging [2] 5/11 8/17 Charles [3] 75/14 77/14 107/19 chasing [1] 49/11 cheaper [1] 96/8 check [3] 49/8 104/15 105/10 checks [4] 50/12 105/13 105/25 166/14 Chesterfield [4] 46/19 75/24 76/4 92/14 Chief [1] 144/13 choose [1] 151/17 Christmas [1] 116/20 chronological [1] 82/10 chunk [1] 56/18 churn [1] 142/5 circumstances [6] 5/2 32/9 33/8 105/7 123/8 174/18 civil [11] 19/21 97/9 97/21 97/22 99/3 99/15 101/2 101/18	111/3 111/4 142/4 claim [2] 23/9 100/3 claiming [2] 21/3 94/17 claims [5] 39/25 52/17 94/16 95/16 100/9 clarification [3] 7/25 26/20 127/9 clarified [1] 104/6 clarify [3] 5/8 161/13 172/21 clarity [2] 140/22 158/19 clear [19] 25/1 28/19 31/4 43/18 45/10 66/1 99/6 99/10 105/4 105/20 105/22 117/16 120/14 126/3 148/14 148/23 152/4 152/15 156/17 clearly [8] 59/4 62/17 62/22 88/25 97/3 132/20 134/24 170/8 clerical [1] 124/12 clerk [2] 4/7 45/8 clerks [1] 68/17 client [2] 61/22 76/18 client's [1] 62/16 close [5] 39/16 39/17 91/7 122/9 176/14 closely [2] 89/15 90/25 code [4] 140/13 140/14 140/15 140/23 codes [2] 140/6 140/7 coincidentally [1] 118/24 colleague [2] 16/3 16/4 colleagues [6] 16/14 24/24 26/14 110/15 110/19 119/20 collection [1] 83/7 combination [1] 145/5 Combined [1] 140/23 come [35] 5/24 7/10 10/21 13/23 19/20 32/11 35/4 35/24 45/18 53/13 54/23 59/16 63/14 64/9 65/1 65/20 67/4 69/21 70/20 81/21 96/13 100/10 103/1 123/10 124/18 132/15 132/19 140/5 140/18 146/20 151/1 152/12 154/11 171/21 172/15 comes [3] 152/13 153/9 165/15 comfortable [1] 30/17

<p>C</p> <p>coming [6] 65/9 73/16 102/3 123/13 126/19 165/9</p> <p>commenced [1] 68/21</p> <p>commend [1] 134/16</p> <p>comment [9] 25/14 67/18 82/18 88/3 88/23 94/25 99/7 99/13 146/4</p> <p>comments [3] 5/15 106/18 121/5</p> <p>commercial [1] 134/22</p> <p>commit [1] 149/1</p> <p>commitment [2] 97/2 148/11</p> <p>commitments [1] 148/1</p> <p>committed [1] 117/1</p> <p>committee [29] 139/19 152/11 152/13 153/4 153/19 153/23 154/13 154/20 155/11 155/18 155/21 166/5 166/24 167/3 167/5 167/5 167/18 168/13 169/16 169/24 170/9 172/24 173/14 173/17 173/19 174/11 174/18 175/25 176/1</p> <p>Committee's [1] 174/15</p> <p>Committees [1] 175/8</p> <p>committing [1] 28/25</p> <p>communicated [1] 151/4</p> <p>communication [8] 100/6 110/15 110/17 110/20 110/21 111/1 111/19 112/14</p> <p>communications [2] 24/3 100/5</p> <p>companies [5] 143/20 149/16 159/11 160/25 175/15</p> <p>company [25] 133/14 135/21 141/2 141/4 146/16 149/20 149/22 153/11 154/15 156/2 160/5 160/8 161/14 161/18 163/23 164/1 164/2 164/2 165/2 167/2 167/9 173/12 173/16 173/23 174/1</p> <p>compiled [3] 54/1 54/25 55/5</p> <p>compiling [1] 55/23</p> <p>complaints [3] 115/5 122/5 124/21</p> <p>complete [4] 13/18</p>	<p>62/21 151/1 176/19</p> <p>completed [1] 176/21</p> <p>completely [1] 140/21</p> <p>completes [1] 104/3</p> <p>completing [2] 14/1 14/2</p> <p>completion [1] 129/8</p> <p>compliance [2] 155/21 169/18</p> <p>comply [1] 66/23</p> <p>compose [1] 78/24</p> <p>computer [8] 19/1 19/4 19/5 19/20 22/24 26/8 50/10 52/13</p> <p>concept [1] 149/24</p> <p>concern [15] 22/6 25/6 32/13 34/12 35/4 35/15 40/2 40/5 64/22 71/4 71/21 84/24 88/1 135/22 171/20</p> <p>concerned [12] 25/9 25/12 25/18 41/3 41/5 55/19 63/6 63/8 84/16 85/4 95/4 122/3</p> <p>concerns [16] 20/18 27/24 28/5 32/5 32/8 32/23 79/11 79/20 84/4 85/18 87/9 87/22 87/24 98/12 99/21 128/1</p> <p>conclusion [2] 87/21 119/9</p> <p>conduct [2] 90/21 164/23</p> <p>conducted [1] 160/7</p> <p>conducting [3] 7/23 43/24 46/14</p> <p>confidence [1] 90/6</p> <p>confident [1] 176/11</p> <p>confined [1] 11/1</p> <p>confirm [5] 1/21 1/23 41/22 88/22 146/8</p> <p>confirmed [1] 159/25</p> <p>confirms [1] 41/20</p> <p>confiscation [4] 32/18 32/20 33/3 33/3</p> <p>confused [2] 11/7 76/15</p> <p>confusing [1] 176/3</p> <p>congratulating [1] 88/9</p> <p>congratulations [3] 129/7 129/20 129/22</p> <p>connected [1] 137/15</p> <p>Connolly [1] 149/7</p> <p>consider [19] 7/22 24/2 30/7 35/14 36/3 54/13 58/17 60/2 62/2 67/20 67/23 71/11 106/7 109/14 122/20 124/11 142/8 142/10</p>	<p>160/24</p> <p>considerable [1] 95/18</p> <p>consideration [3] 29/2 56/23 133/18</p> <p>considerations [1] 123/21</p> <p>considered [9] 5/19 7/3 7/19 28/7 34/1 57/22 68/20 68/25 122/1</p> <p>considering [2] 122/7 151/15</p> <p>considers [1] 62/13</p> <p>Consignia [11] 128/8 128/10 129/1 129/13 131/8 131/25 133/18 149/6 149/9 156/8 156/23</p> <p>consistent [4] 46/23 53/2 89/3 156/6</p> <p>constantly [1] 153/12</p> <p>consumer [1] 134/23</p> <p>contact [6] 14/11 78/10 78/12 87/13 112/7 112/10</p> <p>contacted [3] 23/7 27/17 31/25</p> <p>contacting [1] 121/17</p> <p>contain [1] 38/10</p> <p>contained [1] 39/14</p> <p>containing [4] 74/15 74/19 114/20 115/2</p> <p>content [7] 22/10 63/9 73/4 81/25 82/18 151/6 176/14</p> <p>contents [2] 86/22 127/10</p> <p>context [4] 15/2 78/21 125/8 131/3</p> <p>continually [1] 12/8</p> <p>continue [3] 36/1 86/10 151/15</p> <p>continued [1] 157/2</p> <p>continues [2] 22/16 40/9</p> <p>contract [2] 57/7 66/10</p> <p>Contracts [2] 27/23 32/7</p> <p>contrary [2] 64/23 81/16</p> <p>control [2] 124/14 173/4</p> <p>convenient [1] 53/10</p> <p>conversation [8] 81/14 112/13 113/7 130/17 131/23 143/4 154/13 172/13</p> <p>conversations [8] 15/17 19/14 19/15 91/19 131/20 143/12 143/13 144/4</p>	<p>Cook [4] 158/14 158/15 160/10 160/16</p> <p>cooperation [1] 101/13</p> <p>cope [1] 53/5</p> <p>copied [10] 31/19 74/20 83/23 86/22 87/14 88/3 90/18 104/25 106/13 106/15</p> <p>copies [1] 83/22</p> <p>copy [1] 22/18</p> <p>core [6] 102/25 103/9 150/22 151/4 156/9 170/12</p> <p>corporate [5] 140/6 140/7 140/11 140/23 141/1</p> <p>corporation [1] 156/19</p> <p>correct [52] 1/15 3/24 4/5 4/8 4/12 4/21 4/22 5/21 6/6 6/7 6/14 6/15 6/21 7/5 7/6 9/12 9/15 10/11 15/3 15/4 17/4 26/9 28/13 33/21 39/8 44/2 44/3 44/6 44/7 45/2 45/8 47/4 55/14 55/17 56/2 59/24 109/3 113/13 117/13 118/19 121/21 127/2 128/6 128/12 128/13 128/19 128/21 128/24 134/10 143/9 172/2 177/6</p> <p>correction [1] 126/25</p> <p>corrections [3] 2/1 3/6 49/3</p> <p>correspondence [4] 18/14 40/15 84/22 123/5</p> <p>corroborate [1] 115/18</p> <p>cost [11] 23/24 24/5 24/16 30/2 36/13 62/13 70/19 95/18 98/20 98/22 99/4</p> <p>costing [1] 98/23</p> <p>costings [1] 98/2</p> <p>costly [2] 36/24 99/9</p> <p>costs [11] 35/24 36/19 58/9 64/13 70/5 70/20 98/12 99/19 99/21 115/13 131/23</p> <p>could [79] 1/18 2/7 2/11 5/25 6/18 7/13 15/6 17/19 18/10 24/14 25/8 27/15 28/16 33/1 33/3 34/20 36/17 36/22 36/24 37/11 40/25 41/14 44/15 47/22 51/8 53/5 53/13 53/24 56/20 58/16 58/18 62/1 65/4 69/6 69/12 72/12</p>	<p>75/21 76/6 79/10 81/3 89/16 92/3 93/13 93/18 93/18 93/25 94/4 95/10 96/18 96/18 98/23 103/1 104/4 104/6 108/9 110/2 111/6 111/7 120/23 125/19 128/25 130/13 131/11 131/14 133/2 133/11 141/24 146/6 146/22 153/6 158/9 158/23 161/5 162/19 163/3 166/19 167/23 169/23 172/21</p> <p>couldn't [7] 2/18 28/14 69/11 118/1 135/13 146/4 169/20</p> <p>council [1] 49/12</p> <p>Council's [1] 140/23</p> <p>counsel [17] 20/9 20/9 62/10 62/13 76/12 76/12 78/22 119/20 175/12 175/16 175/18 175/18 175/18 175/20 175/21 175/25 176/8</p> <p>count [1] 149/5</p> <p>counter [6] 4/7 12/19 40/12 45/17 48/15 68/17</p> <p>country [3] 62/15 132/9 132/14</p> <p>couple [4] 2/1 24/2 87/17 175/8</p> <p>course [27] 6/9 7/10 11/17 11/21 11/22 11/24 12/1 12/4 12/5 12/10 12/17 13/5 13/23 20/1 24/14 40/22 46/17 62/14 100/11 103/23 112/3 114/8 132/24 134/14 151/1 151/3 172/22</p> <p>courses [2] 12/15 12/17</p> <p>court [11] 8/7 8/18 9/18 11/9 18/25 57/19 74/2 80/5 92/1 92/3 114/12</p> <p>cover [6] 27/20 32/3 47/25 115/9 150/19 154/24</p> <p>covered [3] 12/8 13/4 54/4</p> <p>CPS [1] 160/12</p> <p>cracks [1] 154/18</p> <p>create [6] 30/24 31/1 43/10 43/10 43/13 100/8</p> <p>creating [2] 40/19 131/3</p> <p>creation [2] 100/12 131/6</p> <p>crime [11] 28/24</p>
---	---	---	---	--

C
crime... [10] 39/23
 161/19 161/20 161/20
 168/3 168/17 172/25
 173/4 173/9 174/20
crimes [3] 161/1
 161/2 173/21
criminal [12] 19/11
 26/10 37/15 45/20
 61/13 68/20 88/13
 99/3 99/14 111/19
 119/21 159/7
criminality [1] 28/25
crippling [1] 132/13
critical [2] 138/20
 165/24
criticism [4] 32/11
 35/5 123/10 123/13
cross [9] 7/7 14/23
 17/11 21/11 21/13
 79/1 79/7 79/24 80/3
cross-disclosure [1]
 7/7
cross-examined [5]
 14/23 79/1 79/7 79/24
 80/3
crossed [1] 99/13
Crown [2] 4/7 138/12
Crozier [4] 137/1
 137/4 158/16 158/17
culled [1] 115/9
curious [1] 145/20
current [2] 40/20
 97/7
currently [1] 105/4
cuts [1] 165/21
CV [1] 128/2

D
Daley [3] 84/9 85/11
 85/22
damning [1] 28/3
danger [1] 39/21
Daniel [2] 27/6 125/1
Darlington [2] 93/7
 94/13
data [120] 14/13
 23/17 23/24 24/7
 24/12 24/12 28/18
 30/1 35/24 36/12
 36/13 36/17 36/24
 37/23 37/24 38/8
 38/10 38/12 38/14
 39/13 39/17 40/17
 40/21 41/6 41/9 41/12
 42/24 43/6 43/11
 43/13 43/14 43/19
 43/21 43/22 44/24
 49/8 50/8 52/3 53/1
 56/7 56/9 56/16 57/1
 58/12 58/17 58/18
 58/25 59/2 59/3 59/4
 59/13 59/13 59/17

59/17 60/5 60/13
 60/15 60/21 60/24
 61/1 61/1 61/21 61/25
 62/2 62/6 62/13 62/19
 62/23 63/13 63/14
 65/8 65/9 65/17 65/17
 65/19 65/20 69/15
 70/6 70/10 70/12
 70/14 70/15 70/18
 71/5 71/13 71/21
 71/24 71/25 72/2 72/6
 72/7 72/9 78/1 81/8
 83/19 98/1 98/2 98/21
 98/25 98/25 101/25
 108/23 109/19 109/22
 111/15 115/2 115/8
 115/12 115/14 115/22
 117/15 118/14 118/16
 119/16 129/17 130/23
 162/3 163/7 175/1
 175/2
date [9] 3/9 3/16 4/17
 21/8 44/14 52/5 71/15
 86/10 151/3
dated [5] 1/14 15/11
 116/10 126/21 146/10
dates [1] 3/6
Dave [14] 17/21 19/8
 19/9 19/14 19/19
 26/10 56/11 61/4 63/8
 87/13 89/22 90/3
 93/12 96/24
Dave Smith [4] 19/8
 19/14 19/19 26/10
Dave Smith's [1]
 89/22
David [13] 70/24
 89/24 104/23 134/6
 144/12 144/17 144/21
 145/8 145/10 145/19
 146/2 146/2 158/13
Dawn [1] 50/13
day [14] 12/17 12/17
 12/20 48/23 48/24
 65/14 74/23 145/14
 148/8 148/18 152/13
 152/13 176/20 177/11
days [7] 11/19 17/19
 129/13 146/16 148/7
 148/12 148/13
deal [5] 14/12 73/23
 76/5 79/10 112/13
dealing [13] 24/10
 26/18 41/8 53/8 62/4
 76/4 78/25 85/7 96/5
 97/24 98/15 142/5
 171/15
dealings [1] 112/2
dealt [5] 6/15 15/17
 17/9 90/13 90/15
dear [3] 21/1 49/7
 72/17
debts [1] 97/11
December [4] 27/13

32/6 112/19 121/13
December 2009 [1]
 32/6
decide [1] 5/3
decided [4] 133/8
 134/13 148/5 161/2
deciding [1] 56/24
decision [15] 13/24
 33/5 36/8 55/15 70/7
 98/19 117/6 117/10
 131/14 131/16 131/17
 160/3 160/11 164/17
 174/5
decision-making [1]
 13/24
decisions [6] 5/11
 5/14 54/20 102/20
 131/3 131/11
declaration [1] 126/6
declarations [2]
 27/13 121/12
declare [1] 51/5
declination [1] 132/8
dedicate [2] 94/3
 95/4
dedicated [2] 156/11
 156/14
deemed [1] 60/22
defects [2] 14/5
 115/14
defence [60] 13/10
 13/20 13/21 18/15
 18/21 18/24 21/3 21/6
 23/15 23/19 23/23
 24/8 24/21 28/12
 32/11 34/19 39/25
 44/18 55/11 55/17
 55/21 56/5 56/17
 56/19 57/11 57/14
 57/15 57/17 58/16
 59/2 60/8 61/4 61/8
 64/6 64/10 65/23 66/8
 66/22 67/5 71/19
 73/25 74/14 74/18
 74/25 75/4 75/9 75/13
 88/14 107/6 107/7
 108/8 108/23 109/19
 109/25 114/7 114/21
 115/3 116/5 116/8
 123/10
defences [1] 59/3
defend [1] 46/8
defendant [5] 22/13
 32/4 37/1 56/25 62/23
defendants [6] 9/9
 37/15 40/6 57/22
 88/16 89/9
deferred [1] 28/4
deficiency [1] 47/7
definitely [1] 158/2
degree [10] 88/11
 111/1 132/12 135/3
 137/16 138/13 145/1
 145/7 157/17 166/12

delay [2] 65/13 75/3
delayed [1] 66/1
deleted [2] 36/18
 72/24
deliberate [3] 36/10
 65/13 113/24
deliver [1] 136/19
delivery [3] 138/16
 148/22 171/2
department [20] 12/6
 18/1 29/6 38/20 38/23
 40/6 46/18 61/17
 63/10 63/15 65/2
 67/17 70/12 75/7
 93/25 95/8 100/7
 110/16 134/8 169/17
departments [3]
 89/14 101/13 159/24
depend [1] 154/1
dependent [1]
 135/14
depending [1]
 134/13
depends [4] 62/7
 109/16 109/19 176/2
deployed [1] 38/14
Deputy [2] 147/2
 147/12
Derek [1] 167/14
derive [1] 104/9
describe [2] 130/13
 158/9
described [5] 95/12
 130/15 155/6 162/6
 164/13
describes [2] 38/3
 81/7
description [2]
 138/17 176/10
design [1] 130/2
despite [1] 32/23
destroy [2] 88/12
 111/9
destroyed [1] 111/16
detail [10] 6/9 13/5
 17/16 22/22 23/20
 76/22 140/25 144/2
 144/3 153/5
detailed [3] 76/23
 125/13 144/4
details [3] 55/11 60/8
 71/9
detrimental [1] 56/20
developed [4] 38/13
 51/21 89/12 89/16
development [1]
 136/10
devise [1] 111/12
dialogue [1] 143/3
did [120] 3/3 13/25
 14/14 15/15 16/23
 17/5 20/5 20/12 20/13
 20/18 22/6 22/21
 25/24 29/19 29/21

34/1 35/22 37/12
 38/19 43/1 43/13
 45/17 46/4 47/5 52/13
 54/2 54/13 54/20
 55/20 56/22 59/5 59/8
 61/14 61/16 63/7
 65/19 67/13 67/20
 73/3 73/9 73/11 75/25
 76/6 76/17 77/20
 80/25 81/4 83/24
 86/17 89/8 91/16
 92/22 93/21 94/17
 99/16 101/1 101/18
 101/20 102/12 102/20
 102/22 104/9 104/11
 106/7 109/4 109/14
 112/6 112/16 112/25
 113/2 113/3 113/9
 113/18 114/2 114/14
 114/24 119/21 120/12
 121/2 124/11 124/18
 124/25 130/4 130/22
 136/5 136/21 137/20
 138/17 140/6 140/9
 141/13 142/8 142/10
 142/16 143/23 143/25
 144/6 144/8 144/10
 145/19 146/5 146/18
 152/23 157/22 157/25
 159/9 159/17 159/18
 160/16 160/24 163/12
 163/17 163/24 164/6
 164/16 164/23 165/15
 167/22 169/2 173/7
didn't [64] 5/10 5/13
 5/20 6/12 6/16 7/2
 7/11 7/16 7/18 7/22
 9/19 9/25 15/14 20/21
 25/23 33/16 35/13
 35/22 37/9 43/6 43/10
 43/10 43/20 46/5 47/2
 47/9 47/10 48/16 54/1
 54/15 55/16 59/6 60/2
 63/1 63/15 63/16
 67/23 69/3 78/1 88/24
 89/12 89/18 90/15
 90/18 91/4 93/1 93/2
 93/2 99/8 106/9
 111/20 111/24 113/8
 114/4 115/9 116/24
 117/6 117/14 132/16
 146/5 153/1 161/4
 161/17 167/4
difference [8] 6/20
 10/2 10/5 139/10
 141/18 141/20 141/24
 155/5
different [12] 4/18
 12/7 12/9 89/14
 112/15 141/3 143/17
 148/2 148/17 153/20
 159/24 168/11
differently [9] 8/10
 8/15 8/19 9/1 9/7 9/20

D	64/23 65/13 65/16 65/22 66/2 66/2 66/5 66/8 67/12 67/13 67/14 69/25 70/17 71/20 72/13 72/25 73/3 73/5 73/14 73/15 73/24 74/3 74/5 75/4 75/5 75/6 76/1 88/12 93/17 93/19 96/6 99/17 100/3 102/20 102/23 104/12 106/8 107/8 107/12 109/11 109/15 110/5 114/6 115/19 116/5	49/9 49/13 50/9 50/16 51/6 51/8 51/22 54/22 54/24 57/8 60/8 60/18 62/23 64/24 69/1 69/15 71/13 71/15 73/9 74/1 77/7 80/6 81/22 83/15 83/15 86/20 87/4 88/20 91/18 94/8 95/8 96/8 96/14 104/7 104/8 104/24 105/16 105/24 106/10 106/22 107/11 107/13 108/4 108/5 108/6 109/9 114/2 114/16 114/24 115/6 115/10 115/16 115/20 117/18 117/21 119/9 119/24 120/8 123/14 125/4 126/5 126/23 127/16 127/18 130/1 134/12 135/25 136/15 136/17 138/1 139/9 139/13 139/17 140/2 140/5 140/17 141/21 142/3 142/4 142/6 145/25 146/18 147/8 147/17 147/23 148/6 148/7 148/10 148/11 148/19 148/20 149/14 150/8 157/8 157/13 157/15 157/16 158/18 159/1 160/13 161/8 161/24 162/6 162/11 163/3 164/8 165/18 166/2 166/22 167/15 168/12 169/12 169/13 169/16 170/7 170/18 172/16 173/3	doesn't [12] 42/2 52/6 77/5 88/4 111/1 113/8 124/21 125/20 135/17 152/12 157/18 176/19 doing [12] 30/24 65/21 83/25 94/2 96/3 96/4 97/14 99/3 116/21 125/4 150/5 150/6 don't [85] 8/14 8/25 15/24 15/24 15/24 17/10 18/20 19/2 19/18 22/14 22/14 25/14 29/10 33/1 33/6 35/25 36/2 36/2 39/6 45/10 48/1 49/9 53/6 61/16 67/16 72/5 77/7 77/7 77/14 79/22 79/22 82/4 84/12 86/6 86/22 88/2 88/23 89/1 89/11 90/17 92/12 96/9 106/12 106/12 108/1 108/2 109/8 111/9 112/13 113/4 113/4 113/11 113/25 115/25 116/11 118/21 120/12 129/24 136/7 139/11 140/25 144/2 145/22 148/19 148/25 149/1 150/4 150/20 151/8 153/5 153/8 157/4 158/4 158/22 162/14 162/15 162/16 162/25 163/20 168/18 168/22 173/6 173/24 174/22 176/23 done [31] 8/9 8/14 8/19 9/1 9/7 9/14 9/14 9/19 9/21 10/7 10/11 10/16 10/17 10/18 52/21 78/4 90/20 93/1 95/19 109/21 111/13 114/4 118/2 118/3 120/4 120/9 122/10 129/21 153/20 162/22 162/22 door [1] 98/8 doorway [1] 14/12 dots [1] 92/24 doubt [2] 23/14 155/8 down [59] 3/14 3/16 5/17 5/25 6/9 10/21 17/19 18/2 33/24 42/12 42/14 44/15 46/11 47/22 50/17 54/3 55/8 56/12 57/5 58/3 58/5 59/11 59/19 61/9 61/11 66/9 67/24 68/4 68/9 69/14 74/17 75/11 77/18 80/22 85/15 92/6 92/16 97/8 99/23 100/11 101/8 104/22 107/3 107/4	108/14 108/19 132/16 146/20 147/8 153/21 154/2 154/8 154/8 154/11 158/4 167/8 167/23 170/3 176/8 draft [3] 73/9 82/14 82/15 draw [1] 41/16 drawing [2] 92/24 93/22 drawn [3] 22/3 24/18 33/17 dropping [2] 22/7 25/10 DTI [6] 143/2 143/6 143/9 143/13 143/22 143/22 due [11] 6/9 7/10 13/23 20/1 56/14 65/1 100/10 105/7 151/1 151/3 170/11 Dunks [3] 55/9 62/4 114/20 duplicate [8] 38/10 38/12 39/14 39/19 39/22 39/23 40/19 81/23 duplicated [7] 38/15 41/12 42/4 42/6 43/5 43/14 43/17 duplicates [2] 38/7 41/19 duplication [6] 40/10 40/12 40/16 41/8 41/25 81/8 duplications [2] 41/23 42/10 during [22] 2/17 2/24 12/11 12/15 36/23 37/8 37/13 40/13 46/19 61/23 67/19 84/19 84/21 90/21 91/14 101/17 103/22 111/21 111/22 112/3 112/8 168/22 Dutch [5] 131/21 132/6 132/20 133/8 143/16 duties [1] 78/16 duty [2] 13/16 44/1 Dyson [1] 147/23
differently... [3] 10/19 52/21 52/24 difficult [5] 30/14 37/2 37/14 49/17 101/14 difficulties [5] 28/1 32/10 100/23 123/9 161/8 difficulty [1] 101/12 Dinsdale [1] 38/17 dire [2] 135/11 135/17 direct [3] 10/24 86/18 112/2 directions [1] 96/1 directly [3] 13/21 24/20 143/6 director [17] 19/10 89/25 128/7 128/17 129/2 133/20 134/5 134/10 134/19 145/22 147/5 147/23 149/6 149/8 152/7 167/15 170/5 directors [7] 132/5 133/18 135/21 136/4 144/16 144/20 157/20 disadvantages [1] 157/9 disagree [2] 70/2 120/10 disappear [3] 135/2 135/16 137/24 disappearing [2] 137/24 138/2 disappointed [1] 27/21 discarded [1] 40/19 disclosable [1] 43/2 disclose [5] 13/16 23/10 55/2 67/21 74/10 disclosed [16] 20/15 34/11 34/15 34/17 35/8 35/11 35/14 35/19 43/5 55/25 56/25 113/21 113/23 114/16 115/3 119/1 disclosing [4] 36/3 67/23 92/21 99/20 disclosure [84] 6/14 6/15 6/16 7/7 9/9 9/11 9/22 9/25 13/2 13/10 13/11 13/15 13/18 13/23 13/25 21/4 22/4 23/15 24/6 35/13 53/23 54/8 54/13 54/14 54/16 54/21 54/21 54/24 55/3 62/11 63/5 63/17 63/18 63/20 63/24 64/1 64/6 64/8 64/12	discontinued [1] 34/12 discovered [2] 7/13 8/3 discrepancies [4] 15/6 27/15 43/6 121/15 discuss [5] 15/15 113/18 143/23 160/16 176/21 discussed [5] 97/1 145/23 150/24 169/8 170/18 discussing [5] 17/16 90/9 143/21 169/7 176/25 discussion [12] 48/14 59/8 75/8 81/22 106/21 107/17 107/19 129/23 143/18 146/2 168/22 169/3 discussions [4] 65/23 143/6 143/22 144/8 disk [3] 41/23 74/15 74/19 Dispatches [4] 170/21 170/24 170/25 171/6 dispute [3] 21/20 99/25 171/13 dissuade [3] 62/22 88/16 89/11 dissuading [1] 89/9 distinct [1] 13/12 distinction [1] 128/15 distinguish [1] 57/12 Division [2] 61/13 70/25 divisions [1] 166/6 do [149] 1/16 7/8 8/9 8/11 8/20 9/8 9/20 10/3 10/13 10/14 11/10 12/2 14/9 18/15 18/19 18/22 20/5 21/16 22/1 22/5 24/5 30/15 30/17 34/13 37/1 37/2 37/14 40/21 44/15 48/12 48/17	document [21] 16/12 66/4 79/14 79/18 93/20 97/19 99/22 100/3 100/12 107/3 108/12 110/7 120/22 120/24 123/2 123/3 123/4 132/15 168/6 168/11 168/11 documentation [7] 16/3 93/14 100/12 107/10 111/6 111/8 164/15 documented [1] 31/25 documents [18] 2/13 2/14 2/18 16/24 69/23 84/1 94/1 94/4 94/10 96/4 96/12 100/8 101/5 101/14 110/2 118/20 128/10 169/4 does [17] 31/14 38/6 40/21 54/9 66/12 68/19 77/5 79/24 79/25 122/21 146/12 154/1 154/11 162/14 168/25 171/5 175/21	drawn [3] 22/3 24/18 33/17 dropping [2] 22/7 25/10 DTI [6] 143/2 143/6 143/9 143/13 143/22 143/22 due [11] 6/9 7/10 13/23 20/1 56/14 65/1 100/10 105/7 151/1 151/3 170/11 Dunks [3] 55/9 62/4 114/20 duplicate [8] 38/10 38/12 39/14 39/19 39/22 39/23 40/19 81/23 duplicated [7] 38/15 41/12 42/4 42/6 43/5 43/14 43/17 duplicates [2] 38/7 41/19 duplication [6] 40/10 40/12 40/16 41/8 41/25 81/8 duplications [2] 41/23 42/10 during [22] 2/17 2/24 12/11 12/15 36/23 37/8 37/13 40/13 46/19 61/23 67/19 84/19 84/21 90/21 91/14 101/17 103/22 111/21 111/22 112/3 112/8 168/22 Dutch [5] 131/21 132/6 132/20 133/8 143/16 duties [1] 78/16 duty [2] 13/16 44/1 Dyson [1] 147/23	
			E	
			E37 [1] 2/13 E38 [1] 2/13 each [7] 40/25 41/1 86/11 156/4 166/5 166/6 166/8 earlier [14] 26/20 34/9 36/6 53/8 59/15 59/15 92/20 101/4 107/4 110/22 122/15 132/19 167/10 174/5 earliest [1] 20/3	

E	embarrassing [1] 117/12	et cetera [1] 116/15	10/3 15/11 79/11 82/100/5	experiencing [4] 24/25 26/14 47/10 77/22
early [8] 4/13 4/15 20/3 28/5 55/8 96/14 129/13 176/11	Emily [1] 99/24	etc [1] 57/11	examples [2] 53/3 66/9	expert [17] 6/4 6/21 6/24 10/2 10/8 10/11 16/17 17/13 23/18 23/19 44/18 75/13 78/7 78/16 78/24 108/23 109/19
earth [4] 122/21 123/12 124/5 124/19	emphasis [1] 102/6	Europe [1] 128/5	excellent [1] 90/5	experts [2] 72/1 97/16
easier [2] 64/5 141/11	employ [2] 96/8 96/8	Evans [4] 167/9	except [1] 158/14	explain [6] 69/6 72/7 76/22 116/18 153/6 173/13
effect [6] 22/3 69/13 105/22 122/13 134/7 151/10	employed [1] 14/23	even [9] 43/5 49/11 86/14 91/13 95/20 102/2 118/25 122/7 145/13	excessive [1] 60/22	explained [4] 42/1 47/6 47/17 115/11
effectively [2] 115/4 144/24	emptied [1] 155/15	evening [2] 14/19 126/4	exclusively [1] 171/15	explaining [1] 41/25
efficient [3] 96/17 136/18 136/21	empty [1] 145/14	eventing [1] 105/8	exec [5] 139/3 139/10 139/10 140/2 165/25	explains [2] 41/18 97/14
effort [1] 70/15	enable [4] 71/8 139/14 152/9 166/3	events [4] 23/14	execs [2] 139/11 139/11	explanation [4] 27/12 37/24 72/14 121/11
eg [1] 57/10	enabled [1] 136/2	eventually [2] 70/23 133/7	execute [2] 139/12 139/13	explanations [2] 68/20 68/25
eg police [1] 57/10	enabler [1] 138/19	ever [9] 29/11 101/19 124/11 124/18 135/24 143/23 144/6 157/1 165/12	execution [1] 140/3	exploit [2] 32/12 123/11
eight [4] 149/8 175/1 175/2 175/7	enacted [1] 97/12	every [9] 64/6 70/15 88/13 148/18 156/3 165/23 166/7 166/8 176/4	executioner [1] 162/7	expressed [4] 27/24 79/12 79/20 129/6
eight years [1] 175/1	encountered [2] 45/25 46/1	everybody [4] 125/19 127/19 141/9 157/12	executive [37] 61/12 84/15 85/2 85/19 87/24 90/3 90/16 91/12 128/7 128/17 129/2 133/18 133/20 134/10 134/19 136/4 139/8 139/17 143/7 143/10 144/9 144/13 144/24 146/9 146/24 146/25 147/5 147/23 149/6 149/8 152/2 152/7 152/7 153/10 153/16 154/21 157/21	extent [3] 34/24 160/24 164/12
either [9] 28/18 31/10 55/1 93/11 93/12 130/1 144/8 157/14 173/6	encountering [1] 100/22	everyone [4] 100/7 103/14 126/3 126/10	executives [4] 84/24 139/12 139/12 166/9	external [3] 95/24 96/3 100/17
elements [2] 127/22 174/16	encourage [3] 24/23 25/11 177/1	everything [6] 14/2 23/8 63/22 86/16 117/4 176/5	exercise [3] 62/21 86/13 100/16	extra [3] 41/21 53/5 72/18
eleventh [1] 58/11	encouraged [1] 25/7	evidence [58] 4/1 5/9 5/12 5/16 5/23 6/2 15/21 22/12 27/5 28/23 30/15 31/21 46/24 48/7 48/8 49/1 52/22 54/11 62/3 64/23 68/23 74/22 78/7 78/9 78/19 79/13 79/17 79/21 95/3 107/4 114/11 115/15 115/18 115/18 117/23 120/25 121/16 122/15 126/7 126/19 127/13 128/1 134/6 135/6 137/4 145/10 150/8 150/21 151/1 151/7 152/22 152/22 155/17 160/10 167/10 176/20 176/21 177/1	exercised [1] 173/3	extracting [1] 71/8
else [8] 19/15 25/15 31/4 64/1 90/24 97/2 121/3 135/3	encouraging [1] 25/10	end [8] 27/10 50/21 79/4 147/13 147/18 147/21 147/24 172/13	exercising [4] 172/24 173/20 174/12 174/19	extraction [1] 38/12
else's [1] 118/22	engaged [1] 97/10	ensure [5] 68/19 100/6 114/14 145/3 154/16	exhibited [1] 114/20	extremely [2] 95/17 145/19
email [81] 3/18 14/9 15/2 16/13 17/12 17/21 18/11 20/11 20/24 21/9 21/21 25/4 37/20 38/1 38/16 38/24 40/8 55/9 55/15 56/3 56/11 58/14 59/15 59/21 60/1 60/6 64/15 70/22 70/23 70/24 71/15 72/15 72/18 75/20 80/10 80/10 82/25 84/7 84/9 85/21 86/18 86/19 86/21 86/24 87/1 87/14 88/7 88/20 88/25 89/3 89/19 89/21 90/18 91/3 91/11 91/16 91/18 91/22 92/23 93/4 94/6 94/7 94/8 96/24 97/6 98/11 99/23 99/25 100/3 100/10 103/25 104/17 104/23 104/24 106/13 106/14 107/6 107/15 107/16 108/5 108/18	entirely [1] 10/24	entire [1] 131/23	existed [2] 35/23 66/17	eye [1] 91/7
emailing [1] 3/20	entitled [1] 66/5	entirely [1] 10/24	existence [3] 39/3 39/10 113/21	face [3] 63/11 118/25 118/25
emails [6] 40/4 41/15 61/4 71/17 79/9 82/11	envisage [1] 83/5	entitled [1] 66/5	existing [1] 94/3	faces [1] 82/13
embargo [1] 176/25	EPOS [1] 163/10	envisage [1] 83/5	exists [1] 108/9	facets [1] 165/22
	EPOSS [1] 68/5	EPOS [1] 163/10	expand [1] 141/24	facilitator [1] 97/15
	equally [1] 172/2	EPOSS [1] 68/5	expect [5] 51/23 94/18 145/6 159/4 175/25	facility [1] 166/13
	equates [2] 56/16 61/23	equally [1] 172/2	expectations [2] 141/1 141/3	facings [2] 134/25 154/14
	equipment [1] 44/24	equates [2] 56/16 61/23	expected [3] 49/19 171/14 171/20	fact [8] 27/25 28/22 36/19 79/6 100/16 102/17 132/24 162/10
	error [13] 14/24 34/10 38/11 42/23 49/3 75/17 75/24 77/19 77/20 98/25 104/19 107/9 110/1	error [13] 14/24 34/10 38/11 42/23 49/3 75/17 75/24 77/19 77/20 98/25 104/19 107/9 110/1	expecting [2] 58/16 145/13	fact-finding [1] 100/16
	errors [7] 14/5 27/17 43/8 43/9 49/2 75/16 115/14	errors [7] 14/5 27/17 43/8 43/9 49/2 75/16 115/14	expensive [1] 62/7	factor [3] 32/20 36/20 123/17
	escalating [1] 155/3	escalating [1] 155/3	experience [11] 45/13 46/7 46/9 48/16 101/1 134/19 134/22 140/20 167/20 175/14 175/23	facts [3] 32/9 92/22 123/8
	essence [2] 86/8 144/22	essence [2] 86/8 144/22	experienced [5] 2/22 45/5 45/7 45/21 116/13	factual [1] 82/18
	essentially [1] 121/5	essentially [1] 121/5		failing [1] 27/9
	established [1] 77/24	established [1] 77/24		failure [4] 22/4 23/10 174/23 174/24
	et [3] 90/3 116/15 116/15	et [3] 90/3 116/15 116/15		failures [2] 46/20 47/5
		example [6] 9/10		fair [4] 30/16 35/7

F	file [1] 33/19	54/8 82/13 99/1	14/7	78/14 78/24 79/6 79/9
fair... [2] 70/18	files [1] 71/8	108/18 128/4 177/11	FUJ00153029 [1] 80/9	79/10 80/14 80/18
172/23	filtered [1] 154/6	follows [9] 23/12	FUJ00153157 [2] 75/10 107/2	82/8 82/25 83/2 83/12
fairly [2] 45/15	final [8] 1/19 6/2	38/4 38/24 39/18	FUJ00153371 [1] 3/18	103/11 103/20 104/3
150/21	44/22 45/3 84/2	50/25 56/13 71/2	FUJ00154851 [1] 61/3	107/17 113/16
fairness [1] 150/22	100/13 108/12 131/11	72/22 98/13	FUJ00154934 [1] 82/24	Gareth Jenkins [2] 15/16 15/19
Falkirk [3] 14/22	finally [2] 6/25 72/8	forceful [3] 9/22	FUJ00155070 [1] 97/20	Gareth's [1] 41/18
16/10 66/19	financial [3] 46/18	116/4 118/15	FUJ00167159 [2] 104/15 104/15	gather [1] 100/19
fall [1] 32/16	135/6 140/22	forensic [1] 56/7	FUJ00155070 [1] 97/20	gathering [2] 97/21 100/22
falling [1] 154/18	financially [1] 132/10	forget [1] 17/1	FUJ00167159 [2] 104/15 104/15	gave [6] 15/21 73/4 78/19 137/4 145/10 152/22
false [15] 22/8 22/11	find [11] 51/7 69/6	form [5] 54/9 83/13	Fujitsu [45] 9/6 14/12	general [16] 5/15
22/13 28/7 31/22	69/12 73/11 76/2	153/22 165/10 171/21	14/20 14/23 23/17	8/25 11/2 11/3 40/5
66/15 67/2 121/25	101/15 111/12 133/22	formal [4] 93/21	23/19 30/6 30/7 36/7	42/5 73/7 73/14
122/8 122/10 122/20	145/20 159/17 159/18	158/10 164/8 164/10	39/1 40/24 56/15 57/7	140/15 159/2 175/12
124/4 159/10 160/20	finding [1] 100/16	formally [1] 166/7	57/16 58/12 60/23	175/16 175/18 175/20
163/14	findings [1] 114/13	format [3] 67/15	61/25 62/4 62/6 65/1	175/25 176/2
familiar [2] 68/23	fine [7] 41/18 82/7	67/16 133/2	66/19 70/25 71/8	generally [1] 42/5
113/4	96/20 103/2 151/12	former [6] 28/22	71/12 71/21 80/21	generated [2] 130/23 163/8
familiarised [1] 8/20	176/7 177/8	89/24 91/23 92/12	83/20 98/1 98/8 98/21	generation [2] 80/14 80/17
family [1] 117/2	finish [4] 96/18 126/5	94/16 97/11	98/24 98/25 102/1	genuine [1] 48/1
far [9] 16/8 40/4	126/7 150/21	forward [8] 9/16	104/5 108/10 109/1	genuinely [1] 64/9
77/12 77/18 92/10	finished [1] 126/8	30/25 47/8 74/20	109/21 110/2 114/18	Geoffrey [1] 1/12
107/24 119/17 134/11	firm [1] 62/9	78/14 82/2 97/18	115/22 117/16 118/16	get [53] 9/25 17/15
161/5	first [31] 2/5 2/9	130/11	119/15 120/11 120/13	24/11 45/8 45/17
fault [9] 29/24 30/5	16/10 16/25 18/25	forwarded [4] 9/6	Fujitsu's [3] 108/3	45/19 48/21 59/1 59/3
30/8 43/20 78/6	28/5 41/15 46/19	104/23 106/17 108/13	108/22 109/18	59/4 60/13 61/1 63/24
108/23 109/19 117/22	48/16 52/9 57/5 57/25	Foster [1] 167/14	full [12] 1/11 14/24	63/25 64/6 64/19 65/3
118/1	58/2 58/3 82/15 86/25	found [4] 8/1 14/20	75/2 114/14 115/2	65/11 65/17 66/2 68/5
faults [11] 31/11	103/10 112/16 114/14	58/11 58/18	115/12 126/16 148/5	69/8 69/23 70/14
36/14 37/11 37/17	123/4 133/9 137/23	four [4] 60/18 99/1	148/6 148/7 148/10	70/15 75/5 75/5 77/12
77/10 77/11 77/23	143/22 145/14 145/17	100/2 137/22	150/2	92/3 93/19 98/8 98/21
107/21 107/22 108/9	147/2 152/21 154/19	frankly [1] 124/6	fully [4] 35/17 35/20	102/2 107/24 116/5
109/6	159/9 159/13 175/19	fraud [12] 17/22 18/3	37/16 71/25	118/10 121/18 132/23
favour [1] 39/24	Firstly [1] 103/23	28/8 31/22 85/15	function [9] 151/24	133/1 135/19 136/15
February [13] 17/20	fit [2] 20/20 38/19	122/1 159/4 159/10	155/21 155/24 155/25	136/16 137/10 138/9
18/3 23/18 44/13 66/7	fitted [1] 176/9	160/19 163/13 170/11	157/9 157/16 157/16	139/9 141/9 146/5
69/22 71/16 71/20	five [11] 11/17 11/19	170/16	157/23 164/4	148/20 153/17 153/17
73/15 104/24 116/10	12/2 32/5 39/8 39/12	fraud-related [1] 159/4	functions [2] 157/6	153/18 153/19 166/13
119/4 126/21	103/14 117/4 118/23	fraud/false [1] 31/22	157/7	getting [13] 63/25
February 2010 [1] 23/18	118/24 150/9	fraudulent [1] 39/21	further [31] 3/12 5/17	66/2 75/1 75/2 75/4
fed [2] 20/16 24/9	five/six [1] 39/12	free [5] 62/6 93/24	24/23 25/10 25/12	84/18 93/14 98/10
fee [1] 97/13	fix [1] 38/13	95/9 95/19 125/21	25/18 27/24 33/20	98/16 100/23 101/12
feed [1] 110/2	fixed [1] 107/11	Friday [1] 21/7	36/9 55/11 58/18 60/8	130/21 166/13
feedback [3] 82/15	flag [2] 136/14	friend [1] 125/6	62/11 72/25 73/13	give [14] 1/11 9/9
129/22 166/14	166/16	froing [1] 64/7	82/19 86/11 87/12	52/2 52/5 52/7 62/11
feel [4] 39/24 51/8	flagged [2] 166/4	front [2] 1/13 126/21	106/4 107/5 107/8	76/6 79/17 93/10
54/24 96/25	166/17	fronts [1] 132/10	108/25 115/1 118/7	96/25 126/19 130/22
feeling [3] 98/17	flaws [2] 162/17	FS [1] 97/2	120/3 120/17 122/12	137/16 166/15
99/11 139/25	162/20	FTSE [3] 149/16	122/25 124/10 172/16	given [22] 1/6 6/5
fees [2] 95/24 96/3	Flemington [1] 95/21	149/20 149/21	176/8	9/12 12/6 35/9 46/21
fell [2] 173/10 173/11	flood [2] 72/25 73/13	FUJ00122906 [1] 81/3	future [4] 38/13	46/24 47/12 63/23
felt [6] 112/1 118/4	flow [1] 158/20	FUJ00122928 [2] 37/19 41/15	43/16 100/4 151/4	64/24 68/15 68/22
121/6 129/18 132/5	focus [9] 12/11 14/6	FUJ00122929 [2] 41/13 42/11	FYI [1] 20/10	72/6 78/9 95/3 109/8
154/14	17/14 87/18 132/23	FUJ00122999 [1] 82/9	G	109/9 117/8 133/19
few [9] 5/6 5/8 17/19	137/10 137/19 157/18	FUJ00123110 [1] 47/16	Gareth [27] 15/16	134/6 176/20 177/1
45/14 61/19 83/3	170/16	FUJ00152817 [1] 55/7	15/19 16/14 16/16	gives [2] 31/21 76/13
94/19 121/22 127/17	focused [2] 78/5	FUJ00152897 [1] 55/7	16/18 37/21 41/25	giving [4] 79/13
fight [1] 69/24	138/21		71/1 75/14 76/22 78/9	79/21 82/1 121/16
figure [4] 32/3 47/25	focusing [1] 11/19			
83/7 172/2	follow [4] 44/1 53/4			
figures [2] 168/7	89/19 171/23			
168/7	follow-up [1] 89/19			
	followed [1] 46/17			
	following [7] 21/2			

<p>G</p> <p>glad [1] 166/23</p> <p>glitch [2] 115/24 119/19</p> <p>glitches [4] 37/10 49/23 118/17 120/14</p> <p>go [43] 4/1 12/8 13/22 16/12 21/5 22/10 24/17 25/21 32/15 33/22 41/14 50/24 51/10 67/25 72/14 78/11 80/19 82/8 92/6 93/13 96/12 99/8 103/15 108/11 114/11 118/16 120/23 123/2 123/3 123/23 125/21 128/16 133/9 146/22 151/10 153/23 162/20 162/21 166/4 166/21 167/6 167/23 168/3</p> <p>goes [5] 49/12 58/8 106/15 152/2 161/20</p> <p>going [80] 1/5 8/12 9/16 10/20 12/5 12/19 14/4 14/5 14/7 16/4 17/13 21/6 21/21 22/8 22/9 22/13 29/15 30/14 30/24 31/4 31/7 33/18 43/11 47/21 50/4 50/20 50/22 52/19 53/22 55/7 57/3 59/22 61/19 65/3 67/1 77/12 78/7 78/20 82/2 84/2 84/20 89/2 89/5 89/11 90/5 90/22 92/16 93/3 93/20 94/13 97/19 99/4 103/11 107/24 114/2 116/12 119/9 120/22 121/8 122/19 124/5 125/18 127/15 128/14 129/4 129/5 135/1 135/16 135/22 135/24 137/24 138/2 138/16 143/17 144/1 145/21 150/9 159/19 166/19 176/24</p> <p>gone [11] 30/3 30/4 30/5 33/1 36/7 50/21 70/8 91/5 117/16 129/23 171/2</p> <p>good [16] 1/3 27/1 27/9 29/15 29/16 61/6 82/12 103/7 103/19 110/17 110/21 111/19 141/6 141/23 145/18 145/19</p> <p>goods [1] 134/23</p> <p>gosh [2] 90/19 92/23</p> <p>got [30] 3/9 8/17 25/15 29/15 49/1 57/24 63/13 70/10</p>	<p>81/1 97/3 107/1 113/6 134/1 138/8 139/4 139/7 139/16 139/18 142/1 142/4 154/19 154/20 154/21 154/21 154/22 165/7 165/14 166/11 167/14 175/1</p> <p>govern [1] 140/15</p> <p>governance [9] 137/8 140/7 140/11 140/11 140/21 140/24 141/2 141/7 141/10</p> <p>governing [1] 6/3</p> <p>government [13] 131/17 131/24 132/25 134/16 134/25 135/14 138/14 141/12 142/1 142/2 142/12 142/16 142/19</p> <p>governments [1] 142/3</p> <p>Graham [2] 86/24 87/1</p> <p>grateful [4] 98/23 125/15 151/9 176/18</p> <p>grave [3] 32/11 35/4 123/10</p> <p>great [2] 2/20 112/13</p> <p>greater [3] 86/14 102/6 119/18</p> <p>greatest [1] 137/6</p> <p>greet [1] 81/16</p> <p>grievance [3] 22/20 23/1 23/5</p> <p>Grocer [8] 18/11 18/12 18/19 19/3 22/22 22/25 26/7 52/13</p> <p>grounds [2] 30/2 115/13</p> <p>group [45] 87/18 128/2 128/3 128/3 128/14 128/16 137/6 139/8 154/23 154/24 155/7 155/12 155/17 155/21 155/23 155/25 156/6 156/13 156/13 157/9 157/22 157/23 157/25 158/11 158/13 158/19 159/11 159/15 160/5 160/8 160/18 160/25 163/19 164/3 164/4 164/21 166/19 167/11 168/4 171/19 171/22 174/9 174/12 175/3 175/13</p> <p>groups [1] 156/11</p> <p>grow [1] 136/17</p> <p>growing [6] 19/16 20/4 20/19 52/12 77/25 84/4</p> <p>guess [2] 167/13 171/6</p> <p>guidance [3] 109/4</p>	<p>109/8 109/9</p> <p>guidelines [1] 159/5</p> <p>guilt [1] 44/5</p> <p>guilty [2] 58/10 62/20</p> <p>guys [1] 84/14</p> <p>H</p> <p>had [162] 2/16 5/19 6/13 6/16 7/13 7/15 8/1 8/18 8/22 9/1 9/12 9/23 13/9 13/12 14/24 15/9 15/22 16/4 16/9 17/8 17/25 18/9 19/20 19/24 22/15 23/8 24/13 27/23 28/15 28/18 28/19 29/7 30/1 31/6 31/25 32/2 32/4 32/7 33/11 33/18 34/17 35/18 36/12 36/18 39/1 42/9 42/23 44/19 44/25 46/1 46/10 50/1 52/14 52/17 57/1 58/3 58/5 59/7 60/10 60/16 60/20 61/8 63/22 63/23 64/7 64/9 66/13 67/9 69/7 70/8 70/13 72/9 77/24 78/6 79/12 79/20 80/1 81/16 81/20 83/19 83/22 85/1 87/8 88/20 88/22 91/5 91/12 94/10 94/22 95/7 95/8 97/7 97/23 97/25 98/3 98/14 99/12 101/19 101/21 101/24 102/4 102/4 102/5 102/9 102/14 102/21 104/9 107/11 107/17 110/9 110/24 111/13 111/13 111/19 111/24 112/2 112/7 114/10 115/11 116/19 116/22 117/2 117/10 118/19 118/25 120/5 121/3 122/10 126/3 127/23 129/20 129/23 131/17 132/8 132/19 133/16 134/8 134/23 135/3 135/4 135/25 135/25 136/1 136/12 137/6 137/9 140/18 140/18 145/18 156/3 157/2 157/3 157/10 161/4 162/17 162/20 162/22 171/1 171/2 172/1 172/4 172/11</p> <p>hadn't [15] 8/2 8/2 9/14 9/14 10/7 28/17 35/17 36/18 46/10 71/22 99/11 117/1 118/1 118/3 124/3</p> <p>half [4] 12/17 12/20 68/15 149/13</p>	<p>half-day [1] 12/17</p> <p>halfway [1] 6/19</p> <p>Hamilton [4] 8/8 9/17 11/10 114/10</p> <p>hand [4] 27/20 32/3 47/25 97/8</p> <p>handling [1] 170/12</p> <p>hands [1] 96/16</p> <p>handwriting [1] 81/10</p> <p>handwritten [1] 81/9</p> <p>happen [12] 35/10 37/13 81/25 135/18 143/15 143/18 146/3 152/10 161/12 162/15 162/16 162/17</p> <p>happened [11] 42/2 108/1 109/20 124/19 127/18 127/21 161/12 162/1 162/24 163/1 163/2</p> <p>happening [7] 39/8 40/17 127/24 130/6 137/12 141/13 163/4</p> <p>happens [1] 105/7</p> <p>happy [4] 81/19 82/2 90/20 117/8</p> <p>hard [1] 150/3</p> <p>harder [1] 9/8</p> <p>hardware [1] 49/23</p> <p>harmless [1] 77/16</p> <p>has [58] 1/6 21/4 21/5 21/11 27/8 27/10 27/17 29/20 30/15 37/25 38/5 38/11 39/2 39/13 40/10 40/12 40/17 41/20 41/23 41/24 48/10 49/4 51/5 56/12 62/8 62/21 66/6 66/6 66/11 67/4 68/6 71/10 78/8 79/16 79/19 80/4 89/20 94/19 97/1 97/1 97/3 99/2 100/7 100/21 108/25 122/5 124/19 126/7 127/18 127/18 127/19 134/6 149/21 150/25 160/10 162/3 166/6 167/20</p> <p>hasn't [2] 71/13 126/8</p> <p>have [337]</p> <p>haven't [8] 29/16 36/4 51/7 87/5 87/6 87/7 163/20 173/14</p> <p>having [16] 2/13 11/23 31/20 31/20 37/8 37/10 51/18 63/1 69/2 77/2 93/15 95/4 95/23 101/8 101/12 143/22</p> <p>Hayward [2] 85/22 87/1</p> <p>hazard [1] 171/6</p>	<p>he [102] 17/22 17/24 17/25 18/3 18/7 18/8 21/6 23/13 24/10 31/19 31/23 31/24 33/7 33/10 38/18 38/18 38/19 38/21 38/21 38/24 38/24 39/10 39/18 40/9 40/9 48/4 49/6 49/12 49/21 49/25 56/12 57/6 57/14 71/1 71/2 71/3 72/15 72/22 72/22 73/4 73/10 73/25 76/19 77/9 78/19 78/25 79/9 80/22 80/23 81/7 81/19 81/19 81/20 81/20 81/21 82/11 83/15 83/15 83/20 84/10 84/11 84/12 85/12 85/17 85/22 87/1 89/20 95/25 97/1 97/3 100/22 104/4 105/4 105/22 107/20 107/24 112/20 112/25 113/1 113/3 113/5 113/5 113/6 113/12 113/17 113/17 118/24 118/25 125/1 126/2 126/8 137/4 137/4 145/11 145/11 145/12 145/19 146/5 150/25 152/23 153/3 160/11</p> <p>He'd [2] 18/7 118/23</p> <p>he's [4] 39/4 39/11 73/19 85/15</p> <p>head [8] 4/9 29/3 70/25 80/21 94/19 94/22 124/19 172/19</p> <p>headed [1] 59/19</p> <p>heading [1] 11/6</p> <p>headquarters [1] 124/14</p> <p>heads [1] 159/24</p> <p>hear [10] 1/3 1/6 53/19 92/5 103/7 103/11 103/15 112/17 125/24 150/16</p> <p>heard [13] 15/22 37/25 68/6 84/14 85/1 87/5 88/4 114/12 135/6 155/17 160/10 162/7 166/22</p> <p>hearing [6] 21/2 23/13 56/5 65/3 177/6 177/11</p> <p>heart [2] 152/2 155/1</p> <p>heavily [2] 132/24 132/25</p> <p>heavy [1] 44/11</p> <p>held [2] 54/15 128/1</p> <p>help [13] 45/18 80/13 80/15 80/25 81/2 94/4 95/13 95/17 95/23</p>
---	---	--	--	--

H	28/23 38/24 42/4 49/22 59/9 68/17 72/18 73/21 80/23 85/13 87/9 95/13 95/17 97/1 97/4 104/3 107/18 107/18 107/19 112/1 112/12 118/18 123/24 125/2 125/3 142/23 144/17 145/11 150/21 151/1 151/3 152/22 160/14	88/16 88/19 89/1 89/6 89/10 90/7 92/7 92/17 93/6 93/9 94/17 94/22 95/16 97/2 97/3 98/15 101/18 101/22 101/23 101/24 102/7 102/9 102/10 102/15 102/19 104/5 105/16 105/24 110/25 111/7 111/14 114/6 115/5 115/18 115/21 116/14 116/17 116/20 117/12 118/4 129/6 129/8 129/11 130/2 130/23 136/1 136/19 138/19 143/23 144/5 163/8	51/25 I am [5] 24/20 58/23 73/1 96/16 146/8 I apologise [1] 104/21 I appreciate [2] 82/17 150/7 I are [1] 24/24 I arrived [1] 145/14 I ask [4] 1/18 103/19 126/15 140/5 I asked [3] 29/5 109/16 112/25 I assume [1] 168/7 I became [3] 15/7 19/23 110/23 I began [1] 102/2 I believe [5] 2/1 18/12 47/24 51/1 87/10 I came [1] 70/11 I can [31] 2/14 12/18 34/17 43/4 45/17 50/14 74/2 74/5 76/4 76/15 80/19 85/11 88/2 88/5 90/21 91/3 96/10 103/8 107/1 113/14 113/20 120/7 122/22 125/25 126/1 129/25 148/8 149/1 150/4 150/20 155/23 I can't [47] 4/17 12/18 13/6 19/18 20/7 21/14 21/16 22/22 25/3 26/2 29/20 41/8 42/17 48/21 58/2 58/4 67/18 72/7 72/10 81/11 82/3 99/13 106/6 106/24 109/13 110/6 120/10 125/7 142/18 145/17 147/9 147/10 147/19 151/10 155/8 155/22 157/4 163/15 163/20 168/2 168/15 169/14 169/22 170/25 171/4 171/10 176/7 I cannot [3] 23/9 56/14 126/5 I carry [1] 150/18 I certainly [2] 144/3 151/8 I considered [1] 34/1 I contacted [1] 23/7 I could [10] 93/13 93/18 93/18 93/25 94/4 95/10 96/18 125/19 161/5 172/21 I couldn't [5] 2/18 69/11 118/1 146/4 169/20 I dealt [2] 6/15 90/13 I decided [1] 148/5 I declare [1] 51/5	I did [13] 20/12 20/13 29/19 29/21 34/1 45/17 54/2 61/16 112/6 113/2 113/9 121/2 130/4 I didn't [19] 6/16 15/14 20/21 37/9 48/16 54/15 59/6 63/1 63/15 67/23 88/24 89/12 90/15 91/4 99/8 113/8 114/4 117/14 167/4 I do [18] 1/16 8/9 30/17 48/17 50/9 51/6 51/8 71/15 77/7 88/20 104/8 107/13 108/6 126/5 127/16 127/18 148/7 159/1 I don't [62] 15/24 15/24 15/24 17/10 18/20 19/2 19/18 22/14 22/14 29/10 33/1 33/6 39/6 48/1 49/9 53/6 61/16 67/16 72/5 77/7 77/7 77/14 79/22 79/22 84/12 86/6 86/22 88/23 89/1 89/11 90/17 92/12 96/9 106/12 106/12 108/1 109/8 112/13 113/4 113/4 113/11 113/25 116/11 120/12 140/25 144/2 148/19 148/25 150/4 150/20 153/5 157/4 158/22 162/14 162/15 162/16 162/25 163/20 168/18 173/6 173/24 174/22 I doubt [1] 155/8 I fed [1] 24/9 I felt [1] 118/4 I find [2] 145/20 159/18 I follow [1] 171/23 I forget [1] 17/1 I found [1] 14/20 I fully [1] 71/25 I genuinely [1] 64/9 I go [1] 162/21 I had [22] 6/16 9/12 9/23 15/9 17/8 22/15 33/18 46/1 63/23 83/22 85/1 88/20 94/10 95/8 97/25 98/3 99/12 110/9 115/11 126/3 127/23 145/18 I hadn't [4] 9/14 9/14 46/10 99/11 I have [24] 1/20 8/7 11/9 25/25 41/21 45/5 48/7 51/6 56/9 62/17 62/25 73/19 74/20 82/16 83/3 83/4 98/14 108/12 108/17 116/13
help... [4] 108/2 119/1 122/6 123/12 Helpdesk [14] 30/23 55/13 55/16 59/14 59/17 59/18 59/22 60/1 61/23 62/5 68/3 70/1 74/11 74/19 helped [3] 19/21 121/19 172/12 helpful [1] 96/19 helpfully [1] 134/22 helping [2] 93/19 95/11 helpline [16] 27/18 28/1 28/19 29/12 29/14 32/1 32/4 114/15 114/18 115/4 117/3 118/23 121/17 121/20 122/6 122/6 hence [2] 69/7 77/17 Henry [4] 103/12 110/12 120/18 178/8 her [24] 14/14 16/14 21/18 27/6 27/6 27/23 27/24 28/1 28/2 32/4 32/7 32/8 61/23 92/15 114/15 114/16 115/4 117/2 119/5 122/11 124/15 124/21 125/1 125/5 here [22] 7/18 12/17 12/23 18/2 20/4 28/14 30/13 82/15 84/6 86/19 93/4 94/14 107/7 123/23 124/19 143/8 166/15 168/12 169/5 169/10 172/24 174/19 Hi [1] 84/12 hidden [1] 83/16 hide [1] 162/25 hiding [1] 83/6 high [4] 60/18 60/19 131/8 132/12 higher [1] 84/13 highlighted [2] 100/18 100/20 highlighting [1] 32/8 highly [1] 117/11 him [18] 77/12 80/22 80/25 83/14 83/20 83/23 83/25 95/19 107/24 112/2 112/11 113/19 118/19 125/1 125/2 125/6 167/15 176/5 hindsight [14] 36/6 57/1 78/4 116/3 116/9 118/15 119/3 122/11 122/14 138/22 138/25 158/18 161/8 161/10 his [35] 24/20 25/22	historic [1] 41/4 history [4] 156/1 159/20 160/1 161/6 hm [3] 26/13 42/25 124/12 HNG [1] 38/5 HNG-X [1] 38/5 Hodgkinson [4] 136/23 153/3 153/15 158/12 Hogg [2] 75/12 107/6 Hogg's [1] 108/18 hold [3] 14/21 25/23 65/11 Holdings [8] 128/12 128/15 166/25 169/25 173/15 173/17 173/20 174/12 honest [1] 157/4 honestly [1] 143/24 Hooper [1] 28/23 hope [2] 107/1 151/6 hoped [1] 88/15 hopefully [1] 79/3 hoping [1] 104/18 Horizon [148] 2/17 2/23 7/3 7/12 7/19 7/21 12/11 14/5 14/25 15/6 16/2 16/6 16/8 17/7 18/12 18/16 18/22 19/2 19/12 19/18 19/25 20/5 20/19 20/20 24/2 24/24 25/2 25/19 26/11 26/15 26/25 27/15 28/20 29/24 30/15 30/20 31/2 31/12 31/15 34/2 34/8 34/10 34/13 36/15 37/4 37/10 37/18 38/6 40/1 40/3 40/7 40/18 40/20 40/21 43/3 43/6 44/24 45/1 45/6 45/11 45/14 45/21 45/23 45/25 46/5 46/8 46/10 49/15 49/18 49/22 50/1 50/3 51/19 53/5 56/7 56/8 61/22 66/12 66/14 67/3 68/24 69/4 72/21 78/3 78/6 81/7 83/19 84/4 84/15 84/17 84/24 85/2 85/5 85/8 86/10 87/9 87/24	Horizon's [2] 41/20 119/22 Hosi [8] 16/5 16/5 16/13 16/20 47/15 48/15 49/14 118/18 Hosi's [1] 116/23 hour [1] 58/11 hours [3] 148/8 148/8 150/3 Housing [1] 124/15 how [40] 9/9 13/5 23/9 25/4 47/14 48/21 51/5 55/5 68/24 69/6 72/5 73/2 73/21 80/5 96/2 108/2 109/10 109/14 111/11 111/17 120/13 122/20 138/1 138/11 138/12 138/14 140/15 140/17 142/14 142/16 143/6 154/10 154/11 155/5 157/3 158/5 159/17 159/18 162/12 165/15 how's [1] 144/1 however [7] 24/20 27/7 38/5 38/13 40/18 77/15 87/11 HR [1] 145/6 HSH [1] 59/20 Hugh [1] 95/21 hundreds [4] 95/24 96/2 96/9 162/23 husband [1] 27/6		
I	I absolutely [2] 148/23 149/13 I accept [2] 122/13 122/23 I accepted [1] 63/11 I acted [1] 2/15 I actually [1] 80/20 I agree [5] 29/12 49/24 62/25 70/20 172/10 I already [1] 29/9 I Also [2] 32/16 36/21 I always [2] 37/7	I did [13] 20/12 20/13 29/19 29/21 34/1 45/17 54/2 61/16 112/6 113/2 113/9 121/2 130/4 I didn't [19] 6/16 15/14 20/21 37/9 48/16 54/15 59/6 63/1 63/15 67/23 88/24 89/12 90/15 91/4 99/8 113/8 114/4 117/14 167/4 I do [18] 1/16 8/9 30/17 48/17 50/9 51/6 51/8 71/15 77/7 88/20 104/8 107/13 108/6 126/5 127/16 127/18 148/7 159/1 I don't [62] 15/24 15/24 15/24 17/10 18/20 19/2 19/18 22/14 22/14 29/10 33/1 33/6 39/6 48/1 49/9 53/6 61/16 67/16 72/5 77/7 77/7 77/14 79/22 79/22 84/12 86/6 86/22 88/23 89/1 89/11 90/17 92/12 96/9 106/12 106/12 108/1 109/8 112/13 113/4 113/4 113/11 113/25 116/11 120/12 140/25 144/2 148/19 148/25 150/4 150/20 153/5 157/4 158/22 162/14 162/15 162/16 162/25 163/20 168/18 173/6 173/24 174/22 I doubt [1] 155/8 I fed [1] 24/9 I felt [1] 118/4 I find [2] 145/20 159/18 I follow [1] 171/23 I forget [1] 17/1 I found [1] 14/20 I fully [1] 71/25 I genuinely [1] 64/9 I go [1] 162/21 I had [22] 6/16 9/12 9/23 15/9 17/8 22/15 33/18 46/1 63/23 83/22 85/1 88/20 94/10 95/8 97/25 98/3 99/12 110/9 115/11 126/3 127/23 145/18 I hadn't [4] 9/14 9/14 46/10 99/11 I have [24] 1/20 8/7 11/9 25/25 41/21 45/5 48/7 51/6 56/9 62/17 62/25 73/19 74/20 82/16 83/3 83/4 98/14 108/12 108/17 116/13		

I	106/9 148/18 153/8	I telephoned [1] 33/17	I tried [1] 65/16	13/9 13/21 36/10 80/8
I have... [4] 126/4	I problem [1] 35/25	I tell [1] 44/12	I try [1] 148/20	98/3 110/21 112/5
148/5 164/19 166/1	I propose [1] 176/13	I then [1] 148/11	I understand [5] 32/6	115/23 146/4 167/21
I haven't [4] 29/16	I put [3] 57/2 58/15	I think [165] 3/14	36/5 74/14 126/25	169/20
87/5 87/7 163/20	116/2	3/17 4/15 5/12 5/16	127/16	I wrote [1] 26/1
I held [1] 54/15	I read [4] 159/20	6/23 8/25 9/21 10/16	I used [4] 45/14	I your [1] 26/20
I helped [1] 19/21	170/20 171/4 171/10	11/4 11/23 12/17	45/24 46/10 116/18	I'd [33] 2/19 4/3 10/7
I honestly [1] 143/24	I realise [1] 102/22	12/20 15/7 15/16 16/5	I visited [1] 3/9	10/9 11/13 34/25 46/1
I hope [2] 107/1	I really [7] 51/14 80/8	16/6 16/9 16/25 17/1	I want [14] 33/14	50/6 57/24 58/3 64/1
151/6	82/4 88/3 117/9	17/21 18/24 19/1 19/3	43/24 44/8 46/11 66/1	64/5 64/10 70/3 70/9
I joined [4] 130/3	I recall [3] 73/23 79/8	20/1 22/12 24/7 24/10	84/7 100/13 126/19	70/13 70/14 73/17
131/21 159/16 159/23	137/22	24/15 25/3 25/21	136/22 148/23 149/13	76/2 78/12 78/17 81/8
I just [17] 2/7 5/8	I received [3] 20/12	29/14 29/19 30/6	151/22 152/21 158/23	82/15 88/22 92/17
25/25 36/19 41/16	65/16 67/16	30/24 32/22 33/13	I was [57] 4/25 8/15	112/10 112/10 114/4
55/5 59/10 65/21	I reduced [1] 149/12	33/13 36/11 36/12	9/14 10/6 11/25 12/5	116/18 130/5 135/10
69/19 83/23 99/6 99/9	I referred [1] 59/6	37/4 38/21 39/22 42/4	12/6 12/10 16/9 16/11	148/5 172/21
103/21 114/11 126/2	I reflect [1] 172/12	42/12 43/18 44/20	16/24 19/22 22/10	I'll [11] 31/13 44/21
127/21 141/15	I remember [4] 88/25	48/2 49/23 52/25 53/1	25/4 30/17 32/22	67/25 78/7 86/25
I knew [4] 19/17	88/25 105/17 125/5	57/25 60/18 60/20	33/13 36/21 45/13	93/10 108/11 127/25
19/17 57/3 159/22	I represent [2]	61/9 64/25 65/7 65/17	45/16 54/15 58/16	128/15 168/3 173/15
I know [9] 11/6 25/17	110/14 120/21	66/18 69/7 70/18	63/19 63/23 66/3	I'm [99] 5/21 6/23
49/15 52/21 86/18	I required [1] 148/24	71/23 79/8 79/8 79/10	70/14 78/5 79/8 91/3	10/20 10/23 10/24
87/15 110/4 153/4	I right [4] 5/9 33/15	79/14 79/15 81/12	91/4 92/5 94/2 95/6	13/4 14/4 14/5 15/25
161/10	67/19 74/22	85/12 85/17 85/22	96/4 96/7 101/11	21/14 21/20 25/21
I left [1] 148/5	I said [6] 36/6 36/21	87/2 87/16 88/20	101/12 102/9 102/12	26/2 29/13 37/16
I let [1] 167/5	65/15 109/17 158/12	89/13 89/24 93/15	104/25 111/4 111/11	40/22 45/9 46/7 46/9
I like [1] 61/6	174/3	94/24 95/3 96/7 96/19	111/12 111/15 112/12	47/21 50/11 53/22
I look [2] 168/19	I sat [1] 17/1	98/6 101/4 101/11	113/25 116/18 116/21	55/7 58/4 58/5 60/12
174/24	I saw [2] 55/5 118/20	102/24 107/5 108/3	124/22 129/14 133/24	61/19 65/2 65/9 70/13
I looked [1] 175/14	I say [12] 8/14 19/19	113/2 113/9 120/12	139/3 148/16 149/14	70/16 70/17 76/15
I may [4] 2/3 103/21	30/17 31/3 119/14	121/2 124/8 129/18	159/18 165/13 169/1	76/20 78/7 82/3 82/6
126/11 172/7	124/9 132/3 141/5	131/17 132/1 132/3	I wasn't [14] 23/3	82/9 83/25 84/2 86/22
I mean [47] 9/11 9/17	143/15 159/23 166/4	132/12 132/17 133/1	29/15 37/6 37/16 46/8	93/20 94/13 96/14
11/6 13/17 13/20 20/1	171/18	133/6 133/6 134/11	64/11 75/3 86/4 90/22	97/19 101/10 104/16
20/8 28/11 28/22	I see [3] 113/9	134/21 136/19 137/9	91/7 91/9 109/24	104/18 104/19 105/19
30/11 34/9 49/16 63/7	116/22 148/12	137/10 137/22 138/21	117/8 124/22	106/12 106/24 112/15
65/4 69/5 71/15 73/2	I seem [3] 6/22 29/4	138/25 138/25 139/9	I went [2] 29/9 75/8	112/18 113/4 113/11
83/18 85/11 88/24	50/9	139/13 140/2 140/3	I will [3] 108/21	114/2 115/3 116/3
90/18 92/20 94/12	I sent [1] 25/4	140/12 140/15 141/5	109/17 151/14	119/9 120/21 125/14
99/2 113/16 130/15	I should [5] 92/24	141/6 141/7 141/9	I wish [3] 8/18 57/1	126/5 127/15 127/22
134/11 135/10 135/11	93/1 116/4 118/15	141/15 141/16 141/20	63/22	127/23 128/14 129/4
137/22 137/23 138/4	122/12	141/21 141/22 142/1	I wonder [1] 95/18	129/4 129/17 143/9
139/9 140/9 155/8	I showed [1] 41/16	143/8 143/9 143/25	I work [3] 148/7	146/1 149/4 150/6
156/1 157/4 157/11	I sort [2] 130/4 161/4	145/5 147/4 147/9	148/9 148/17	150/9 151/8 151/10
158/3 160/14 168/16	I spent [1] 11/23	147/19 148/4 149/2	I worked [2] 16/4	153/3 153/25 156/10
168/18 168/21 169/20	I spoke [3] 19/19	152/3 152/16 153/19	150/2	156/10 156/15 156/17
174/24 174/25 175/14	113/2 113/9	155/22 156/1 156/4	I would [54] 2/5 8/14	157/25 163/9 163/25
I mentioned [3]	I start [1] 167/25	156/7 156/9 157/17	9/15 9/21 9/21 10/16	164/5 164/19 166/18
42/22 90/23 101/4	I started [2] 19/22	163/21 163/25 164/5	10/18 13/17 24/19	166/22 167/12 171/10
I met [1] 130/4	110/23	164/25 167/9 167/12	30/7 32/14 35/17 40/8	171/12 171/17 172/18
I must [3] 65/8 86/23	I step [1] 175/6	168/8 170/20 170/21	42/18 46/2 46/3 46/22	174/3 176/11 176/17
159/2	I still [2] 95/7 150/5	171/1 171/3 171/17	49/9 50/5 51/25 52/6	176/18
I need [1] 128/15	I stress [1] 75/3	172/10 172/11 172/12	52/25 63/18 70/10	I've [23] 2/21 5/16
I never [3] 45/25 66/1	I studied [1] 169/4	174/3 175/3 176/3	75/6 75/8 78/11 94/25	18/14 19/8 25/15 30/6
150/3	I suggest [3] 105/14	176/7 176/22 177/4	98/23 104/25 112/5	31/6 81/1 81/11 82/13
I note [1] 127/3	118/9 119/21	I thought [11] 9/11	119/25 123/22 133/25	88/3 90/20 107/1
I now [1] 74/19	I suggested [2] 77/10	15/13 20/13 21/16	140/10 142/18 143/25	113/6 150/2 150/18
I only [1] 118/20	107/21	22/11 37/11 114/20	144/22 146/1 148/14	150/24 156/1 164/15
I performed [1] 102/2	I suppose [5] 25/20	114/25 115/1 145/19	148/21 150/2 156/15	166/22 172/6 175/15
I picked [1] 111/3	45/24 58/19 89/16	172/20	158/1 159/4 159/23	175/17
I pointed [1] 122/15	122/9	I told [1] 49/7	163/15 164/19 167/6	icon [2] 45/6 116/14
I presume [1] 75/9	I take [4] 35/7 41/9	I took [1] 48/9	167/21 169/14 171/6	idea [10] 5/19 133/6
I probably [4] 57/4	126/24 167/12	I transferred [1] 4/17	171/20 177/1	133/24 134/3 137/10
			I wouldn't [12] 8/3	137/15 145/22 156/9

I	111/1	Inquiry's [2] 4/2 6/22	106/13 123/20 124/18	Iron [1] 23/8
idea... [2] 157/5 159/20	indicating [3] 107/16 108/24 165/9	insert [1] 81/5	134/17 135/15 136/8	irrelevant [2] 62/13 129/4
identification [1] 151/23	indication [2] 6/23 126/7	insinuate [1] 116/16	140/6 149/23 154/11	irrespective [2] 7/21 70/19
identified [11] 7/15 16/9 34/17 35/18 36/4 39/20 78/6 86/9 97/9 131/5 154/17	indictment [1] 115/9	insist [1] 57/19	155/10 163/22 163/23	is [361]
identifies [1] 153/11	individual [3] 63/3 97/16 156/4	insofar [1] 55/19	164/1 165/21 166/11	Ismay [1] 89/20
identify [8] 30/8 36/22 37/1 42/19 49/15 52/2 115/21 115/24	individually [1] 41/2	insolvent [1] 138/8	171/2 172/19 173/11	isn't [13] 8/23 34/5 48/20 49/17 59/1 66/24 87/15 105/20 108/7 118/11 161/24 161/24 161/25
identifying [2] 154/4 155/2	individuals [2] 100/1 159/3	installation [1] 129/9	introduced [1] 11/8	issue [30] 23/15 24/6 26/4 33/12 37/22 37/24 37/25 41/25 52/12 53/22 59/9 69/1 72/20 78/1 79/2 81/23 95/15 97/3 99/19 105/9 135/23 135/24 138/1 139/14 157/11 161/25 165/11 166/3 166/4 166/16
ie [3] 86/15 130/18 132/19	induction [3] 145/4 145/7 146/5	instance [2] 46/19 57/5	intruded [1] 123/20	issues [40] 2/16 17/6 31/23 43/3 43/11 43/13 46/10 49/18 56/11 56/12 67/3 72/13 77/2 81/7 86/9 98/15 100/9 101/8 101/24 102/23 105/7 106/2 114/7 130/11 130/12 130/13 130/16 131/5 131/13 132/9 134/24 137/11 137/11 137/20 137/21 137/23 145/23 145/25 165/24 167/7
ie because [1] 130/18	indulgence [1] 176/19	institutional [1] 120/8	investigate [8] 32/23 36/8 36/11 36/14 49/16 119/10 119/22 120/1	it [556]
ie if [1] 132/19	industrial [2] 132/9 132/12	instructed [2] 134/8 134/11	investigated [10] 31/9 35/18 35/20 47/3 102/4 108/10 118/7 118/9 124/17 161/1	it's [111] 1/12 3/9 3/9 3/10 3/17 5/7 5/9 5/12 6/2 11/6 11/13 16/5 16/13 22/12 23/11 26/18 28/14 28/19 29/11 30/14 31/5 31/8 33/23 34/9 34/22 37/25 39/7 39/7 39/10 42/17 43/9 46/7 48/23 48/24 49/16 52/21 53/23 53/24 55/9 58/23 59/19 59/22 60/13 60/14 61/9 61/10 61/12 63/14 65/5 65/5 67/12 70/18 70/23 72/4 73/19 81/6 82/25 83/13 85/13 86/25 99/4 99/8 99/13 99/22 100/1 104/15 106/16 107/2 118/6 120/14 122/4 122/14 127/2 127/20 127/21 129/24 130/7 130/8 143/24 145/17 145/20
ie in [1] 86/15	industry [2] 134/9 135/4	integrity [27] 16/1 19/13 24/23 25/19 26/12 26/15 40/1 40/3 40/6 43/11 43/13 78/3 84/15 84/17 84/25 85/2 85/5 85/9 87/24 93/6 93/9 94/17 98/15 101/18 102/10 111/14 114/6	investigates [1] 161/19	
if [219]	iNED [1] 148/3	intention [1] 80/19	investigating [5] 13/13 47/18 109/22 124/24 163/13	
imagine [5] 143/25 154/24 157/5 158/1 167/21	infallibility [1] 119/23	interaction [1] 137/13	investigation [33] 2/17 2/24 8/16 10/17 12/6 17/25 18/17 29/6 29/7 29/11 30/10 30/12 32/25 36/7 36/16 49/21 49/25 50/3 50/19 52/17 68/21 93/25 94/11 95/8 95/10 99/14 117/17 159/6 172/25 173/4 173/9 173/21 174/6	
immediate [1] 66/17	inference [2] 22/2 24/18	interest [3] 5/18 5/23 91/2	investigations [6] 12/9 42/3 43/24 46/12 86/5 170/16	
impact [2] 109/11 109/14	inflated [1] 27/10	interested [4] 90/10 91/13 91/15 92/11	investigative [2] 106/5 109/5	
implementation [1] 138/19	inflating [3] 27/19 32/2 47/24	interface [2] 152/14 158/6	investigator [19] 2/15 3/4 4/11 4/13 17/2 17/3 30/9 35/6 37/6 46/22 69/5 70/17 79/17 85/12 101/20 110/18 115/19 119/17 161/15	
implications [1] 131/8	influenced [1] 137/12	Interim [1] 128/18	Investigator's [1] 68/16	
important [9] 89/23 113/22 135/19 136/11 139/1 148/4 151/24 152/14 158/4	inform [1] 23/14	internal [5] 154/20 155/22 166/11 167/14 167/17	investigators [14] 11/21 12/1 17/17 19/24 44/1 44/19 53/3 84/16 85/4 85/7 85/9 87/8 110/16 110/24	
importantly [2] 41/19 83/7	information [44] 14/20 20/6 22/17 29/8 60/25 64/14 64/25 64/25 66/21 66/25 67/6 67/8 67/21 68/10 74/20 75/2 75/22 83/21 97/16 97/21 97/25 98/10 98/16 98/18 99/17 99/20 100/15 100/18 100/20 100/22 101/1 101/9 103/22 106/3 106/17 108/8 109/11 113/1 116/23 158/20 159/17 170/16 172/9 172/11	internally [1] 160/12	involve [3] 13/3 109/23 169/2	
impression [1] 69/23	informed [4] 16/11 21/11 27/18 90/17	interrupted [1] 172/18	involved [16] 2/25 11/3 13/24 18/23 34/22 38/3 41/4 51/9 52/15 87/20 94/9 102/12 127/19 154/23 160/18 169/1	
inclination [1] 119/10	informing [1] 32/1	interview [19] 16/25 17/2 19/25 26/25 29/9 32/25 36/23 37/5 46/15 46/19 47/5 47/15 47/19 47/20 50/13 50/17 52/9 52/10 125/7	involvement [9] 13/9 16/23 78/19 93/8 94/11 99/12 116/19 162/11 162/12	
include [4] 54/17 71/7 125/20 168/25	inherent [1] 162/12	interviewed [3] 49/17 118/19 125/6		
included [2] 89/21 160/22	inherently [1] 170/9	interviewing [1] 50/16		
includes [1] 128/3	initial [6] 2/17 2/24 8/15 10/16 40/23 71/24	interviews [5] 51/18 111/14 133/16 145/24 146/2		
including [3] 16/14 170/15 171/3	initially [5] 22/8 42/4 58/17 133/24 143/12	into [41] 4/1 13/5 14/12 17/15 32/20 35/22 35/24 36/2 38/19 45/17 49/21 49/25 50/3 56/23 61/15 63/2 70/20 89/12 89/16 90/18 98/5 98/8 104/25		
income [1] 135/1	input [6] 16/18 55/20 61/15 63/2 63/4 92/18			
increased [1] 170/15	inputted [1] 55/2			
increasing [3] 83/8 94/24 102/11	inquiry [23] 6/12 21/19 37/25 44/2 44/5 46/25 68/6 69/3 79/19 88/8 89/20 102/22 114/5 114/12 125/15 126/19 127/14 134/6 145/10 149/23 151/2 152/22 160/10			
incurred [1] 51/24				
incurring [1] 29/13				
independence [2] 137/16 162/10				
independent [4] 6/4 134/4 134/9 136/23				
indicate [2] 3/20 105/9				
indicated [2] 23/23 56/6				
indicates [2] 38/9				

<p>I</p> <p>it's... [30] 147/25 154/6 154/10 157/11 157/12 157/12 157/12 160/14 161/6 161/7 162/6 163/1 163/1 163/1 163/1 163/2 163/5 165/20 165/20 168/3 168/15 168/19 168/20 169/5 169/23 170/20 171/5 172/6 175/22 175/23</p> <p>item [4] 64/6 75/5 75/6 170/6</p> <p>items [4] 55/6 75/2 76/5 101/10</p> <p>its [17] 35/12 129/6 132/21 133/2 133/2 133/2 134/3 134/5 135/1 135/16 136/21 137/7 145/21 166/6 166/9 169/18 170/10</p> <p>itself [3] 39/16 43/7 161/21</p>	<p>jobs [1] 95/7</p> <p>jog [1] 88/4</p> <p>jogs [1] 81/13</p> <p>John [1] 93/12</p> <p>join [1] 145/21</p> <p>joined [9] 4/11 128/2 129/11 130/3 131/21 145/12 152/23 159/16 159/23</p> <p>Jon [17] 1/6 18/17 21/24 61/5 72/18 80/12 81/15 87/16 87/18 95/16 95/23 96/25 100/21 100/24 106/17 113/2 113/9</p> <p>Jon Longman [7] 1/6 18/17 72/18 81/15 95/23 113/2 113/9</p> <p>Jon Longman's [1] 87/16</p> <p>JONATHAN [7] 1/9 1/12 167/8 167/21 173/25 176/3 178/2</p> <p>Jones [3] 70/24 104/23 105/3</p>	<p>61/19 63/1 64/5 64/24 65/2 65/9 65/21 67/4 68/9 69/19 72/8 76/15 77/6 78/17 82/6 82/20 83/13 83/23 83/25 86/25 86/25 88/2 88/22 89/4 90/15 94/13 94/15 95/3 96/5 98/14 99/6 99/9 99/12 99/21 102/8 103/21 106/13 108/14 113/5 114/11 124/23 126/2 127/9 127/21 129/17 130/15 131/14 131/15 133/1 136/7 136/13 136/14 138/3 140/22 141/15 142/1 144/19 146/1 150/2 150/7 151/17 152/12 153/6 154/19 155/12 156/17 157/2 157/5 158/4 158/9 161/13 168/3 169/6 170/22 172/6</p> <p>justice [3] 28/22 161/16 162/2</p> <p>justify [2] 90/6 115/15</p>	<p>88/22 88/23 89/1 89/12 89/18 89/24 90/15 90/19 90/22 91/4 91/6 92/2 92/12 92/18 93/18 94/1 96/9 98/9 99/12 101/12 102/5 104/25 106/12 108/2 110/4 112/22 113/11 113/17 120/1 120/13 124/23 132/15 133/1 134/1 134/16 134/17 134/23 135/17 136/10 136/13 138/3 138/11 139/16 139/22 140/10 140/16 140/19 140/19 141/22 142/3 144/1 146/1 152/18 153/4 153/5 153/12 157/5 159/19 159/21 159/25 161/5 161/10 163/20 164/6 165/21 165/23 166/13 167/21 168/18 169/4 171/3 173/6 174/22 175/17 176/24</p> <p>knowing [4] 29/1 52/10 52/23 98/9</p> <p>knowledge [16] 1/24 14/24 15/9 44/19 44/23 67/9 69/4 77/24 80/1 81/1 97/23 98/1 98/3 119/18 127/11 164/8</p> <p>known [12] 35/5 72/21 75/17 77/19 77/20 88/7 104/4 105/15 107/9 110/1 114/7 131/13</p>	<p>lawyer [1] 99/24</p> <p>lawyers [4] 19/22 97/13 98/14 100/17</p> <p>lay [4] 6/21 10/3 10/8 174/7</p> <p>lead [7] 2/15 3/4 17/2 17/3 28/3 32/19 72/25</p> <p>Leader [1] 18/8</p> <p>Leadership [2] 87/3 87/23</p> <p>learning [2] 10/9 12/3</p> <p>learnt [1] 10/9</p> <p>least [12] 2/25 20/2 26/7 35/1 35/8 55/2 107/18 114/9 133/9 134/4 146/16 159/2</p> <p>leave [2] 5/2 5/3</p> <p>leaving [2] 86/14 146/23</p> <p>led [1] 87/18</p> <p>Lee [3] 15/21 15/22 79/12</p> <p>Leeds [2] 147/2 147/12</p> <p>left [8] 4/20 4/23 33/19 114/23 132/21 143/16 148/5 150/19</p> <p>legal [46] 13/19 21/17 24/9 47/8 57/17 61/12 61/17 63/10 63/15 64/8 65/23 67/17 69/19 70/8 70/25 72/3 72/10 76/18 86/12 95/18 120/2 121/9 121/23 150/24 156/7 163/16 163/22 163/24 163/24 164/4 164/20 164/21 164/24 165/20 167/11 167/11 167/20 167/20 169/18 173/11 174/2 174/7 175/18 175/21 176/6 176/8</p> <p>Leighton [16] 103/15 126/1 126/12 126/13 126/15 126/17 127/13 127/25 150/20 151/9 151/22 171/12 172/20 172/23 176/17 178/12</p> <p>Leighton's [2] 126/6 150/24</p> <p>lengthy [2] 21/2 73/24</p> <p>LESLIE [3] 126/13 126/17 178/12</p> <p>less [2] 36/24 100/20</p> <p>let [12] 10/24 75/21 81/12 87/12 92/2 99/21 104/15 136/7 148/14 162/14 164/11 167/5</p> <p>let's [10] 50/13 55/10 60/7 88/6 121/22 123/2 131/25 143/21</p>
<p>J</p> <p>January [14] 3/11 14/8 15/23 16/2 39/3 39/7 39/11 78/21 79/13 79/19 104/1 105/15 128/18 128/22</p> <p>January 2002 [2] 128/18 128/22</p> <p>Jarnail [21] 20/10 22/1 23/13 24/20 31/18 35/3 35/16 56/4 61/10 70/24 72/15 72/17 74/8 75/19 78/8 80/11 88/8 91/9 108/16 112/20 123/5</p> <p>Jason [2] 87/12 96/25</p> <p>Jason/myself [1] 87/12</p> <p>Jenkins [36] 3/15 3/21 15/8 15/16 15/19 16/15 41/25 72/19 72/23 73/9 75/14 78/18 79/6 80/20 81/2 82/8 82/23 82/25 83/12 83/14 83/18 103/12 103/20 103/22 105/21 105/21 106/7 106/15 106/23 108/7 108/25 111/24 112/6 112/8 112/14 113/16</p> <p>Jenkins' [3] 37/21 71/1 78/9</p> <p>Jennifer [1] 120/21</p> <p>Jerry [2] 16/20 47/15</p> <p>job [8] 4/18 4/19 4/24 4/25 13/25 94/3 94/12 145/19</p>	<p>journal [1] 18/13</p> <p>judge [3] 21/4 66/7 162/7</p> <p>judgement [2] 80/4 80/7</p> <p>judgment [6] 8/7 9/18 11/9 11/11 66/20 114/10</p> <p>Julian [3] 93/7 94/8 94/13</p> <p>Julian Wilson [2] 93/7 94/13</p> <p>Juliet [1] 112/21</p> <p>July [13] 31/18 37/19 39/4 39/7 39/11 51/16 56/5 75/10 77/18 81/15 84/6 87/20 108/15</p> <p>July 2010 [1] 77/18</p> <p>jumped [1] 87/25</p> <p>jumping [1] 88/16</p> <p>June [6] 26/18 28/10 55/8 55/17 60/3 60/6</p> <p>junior [1] 61/18</p> <p>jury [1] 162/7</p> <p>just [125] 2/7 2/19 3/6 5/2 5/6 5/8 5/15 7/25 8/2 10/25 11/11 11/13 11/19 12/7 12/8 16/20 17/9 17/14 20/14 21/22 22/5 22/10 24/5 25/25 26/3 29/14 30/13 31/8 33/19 34/9 36/19 41/3 41/14 41/16 42/1 42/8 42/19 45/13 45/24 46/7 46/9 47/21 49/20 52/4 53/4 54/24 55/5 55/6 56/22 59/10</p>	<p>justice [3] 28/22 161/16 162/2</p> <p>justify [2] 90/6 115/15</p> <p>K</p> <p>keep [4] 21/11 95/20 111/10 157/6</p> <p>keeping [1] 90/17</p> <p>kept [5] 19/11 77/10 107/21 155/25 156/9</p> <p>key [2] 98/8 170/14</p> <p>Keynes [1] 11/22</p> <p>kind [4] 66/24 67/9 75/21 80/6</p> <p>kindly [1] 150/25</p> <p>kinds [1] 55/19</p> <p>knew [18] 17/8 19/17 19/17 26/4 26/7 26/10 29/9 52/10 57/3 106/19 117/1 117/5 117/6 118/9 118/18 118/20 159/22 160/1</p> <p>know [136] 5/10 5/13 5/20 6/16 10/10 11/6 15/14 15/24 15/24 19/9 19/24 20/16 22/14 25/14 25/17 29/17 30/21 31/5 33/1 36/14 37/9 37/12 45/15 46/2 47/9 47/10 49/15 49/20 51/6 51/20 52/7 52/21 52/23 53/6 53/7 54/15 58/1 58/15 58/24 60/22 61/1 61/25 63/11 64/8 64/11 65/11 67/16 70/7 72/5 72/7 77/20 81/1 82/4 82/5 85/2 86/6 86/18 87/13 87/15 88/2 88/4</p>	<p>knowing [4] 29/1 52/10 52/23 98/9</p> <p>knowledge [16] 1/24 14/24 15/9 44/19 44/23 67/9 69/4 77/24 80/1 81/1 97/23 98/1 98/3 119/18 127/11 164/8</p> <p>known [12] 35/5 72/21 75/17 77/19 77/20 88/7 104/4 105/15 107/9 110/1 114/7 131/13</p> <p>L</p> <p>lack [5] 27/21 64/22 68/16 158/18 162/11</p> <p>lady [1] 124/20</p> <p>landscape [2] 175/6 175/7</p> <p>laptop [1] 80/21</p> <p>large [5] 59/3 89/4 98/16 130/17 175/15</p> <p>last [8] 28/23 51/15 58/19 82/12 83/4 103/10 116/9 121/22</p> <p>Lastly [1] 124/24</p> <p>Lastminute [1] 147/15</p> <p>late [10] 4/13 4/15 62/20 65/12 65/14 71/17 74/23 78/23 79/14 92/8</p> <p>later [7] 17/19 19/21 20/2 55/12 68/13 147/9 172/14</p> <p>law [6] 12/9 19/11 26/10 61/13 111/19 119/21</p>	<p>lawyer [1] 99/24</p> <p>lawyers [4] 19/22 97/13 98/14 100/17</p> <p>lay [4] 6/21 10/3 10/8 174/7</p> <p>lead [7] 2/15 3/4 17/2 17/3 28/3 32/19 72/25</p> <p>Leader [1] 18/8</p> <p>Leadership [2] 87/3 87/23</p> <p>learning [2] 10/9 12/3</p> <p>learnt [1] 10/9</p> <p>least [12] 2/25 20/2 26/7 35/1 35/8 55/2 107/18 114/9 133/9 134/4 146/16 159/2</p> <p>leave [2] 5/2 5/3</p> <p>leaving [2] 86/14 146/23</p> <p>led [1] 87/18</p> <p>Lee [3] 15/21 15/22 79/12</p> <p>Leeds [2] 147/2 147/12</p> <p>left [8] 4/20 4/23 33/19 114/23 132/21 143/16 148/5 150/19</p> <p>legal [46] 13/19 21/17 24/9 47/8 57/17 61/12 61/17 63/10 63/15 64/8 65/23 67/17 69/19 70/8 70/25 72/3 72/10 76/18 86/12 95/18 120/2 121/9 121/23 150/24 156/7 163/16 163/22 163/24 163/24 164/4 164/20 164/21 164/24 165/20 167/11 167/11 167/20 167/20 169/18 173/11 174/2 174/7 175/18 175/21 176/6 176/8</p> <p>Leighton [16] 103/15 126/1 126/12 126/13 126/15 126/17 127/13 127/25 150/20 151/9 151/22 171/12 172/20 172/23 176/17 178/12</p> <p>Leighton's [2] 126/6 150/24</p> <p>lengthy [2] 21/2 73/24</p> <p>LESLIE [3] 126/13 126/17 178/12</p> <p>less [2] 36/24 100/20</p> <p>let [12] 10/24 75/21 81/12 87/12 92/2 99/21 104/15 136/7 148/14 162/14 164/11 167/5</p> <p>let's [10] 50/13 55/10 60/7 88/6 121/22 123/2 131/25 143/21</p>

L	liquidity [1] 170/13	53/24 54/6 54/23 55/7	97/25 98/1 98/3 98/17	132/6 170/15
let's... [2] 147/10 173/25	Lisa [5] 17/3 17/5 17/8 47/18 47/22	56/3 59/16 61/3 64/15 66/4 66/9 67/14 70/21 72/19 74/7 74/9 75/10 75/11 77/9 78/20 79/15 80/10 81/3 82/20 82/24 83/14 86/19 89/19 91/21 93/4 96/22 97/4 97/8 98/11 103/21 105/2 107/21 114/2 121/7 121/22 128/25 136/22 147/10 148/11 151/22 152/21 158/23 166/19 168/19 174/24 175/1 175/6	120/11 130/17 130/20 131/20 134/25 135/12 137/9 137/13 140/17 140/17 143/3 143/4 143/18 152/12 155/9	Mail/Consignia [1] 129/13 main [4] 50/15 51/4 78/9 98/7 mainly [1] 101/12 maintain [2] 136/16 152/24 major [6] 141/12 152/4 153/11 154/14 154/25 155/1 majority [1] 141/21 make [43] 2/2 2/5 2/12 3/23 21/7 27/1 27/9 29/15 29/16 34/20 42/8 44/12 46/22 51/4 52/13 54/20 66/1 88/21 91/4 92/23 98/19 99/6 99/10 100/16 101/20 102/12 102/20 105/4 105/22 105/25 111/8 112/1 122/21 126/2 127/1 133/9 135/8 139/4 139/4 139/13 152/9 152/15 160/13 makes [4] 43/18 152/4 157/15 158/8 making [11] 5/10 5/13 9/22 13/24 46/17 80/6 93/17 104/7 124/20 125/12 132/25 manage [1] 139/7 manageable [1] 100/17 managed [2] 139/6 155/5 management [21] 108/3 108/22 109/18 139/17 139/21 140/8 151/22 151/24 152/5 152/5 152/8 152/10 152/19 154/21 154/22 154/22 155/1 155/2 166/6 166/7 167/15 manager [15] 17/22 17/22 17/24 18/4 18/6 18/8 18/17 27/23 29/19 32/8 38/17 47/4 84/10 95/9 121/3 managing [3] 89/25 145/21 155/3 Mandy [3] 21/9 21/15 23/12 manner [1] 10/12 manuals [1] 12/7 many [15] 24/14 25/4 30/23 58/10 62/18 73/15 90/6 95/25 120/13 135/18 138/5 139/6 139/6 149/24 165/5 March [4] 20/22 26/3 80/9 128/20
letter [9] 61/3 61/6 61/8 61/9 61/14 62/22 63/2 125/5 146/6	list [10] 54/1 54/6 55/6 63/24 75/6 129/3 138/22 146/25 167/8 167/19	82/20 82/24 83/14 86/19 89/19 91/21 93/4 96/22 97/4 97/8 98/11 103/21 105/2 107/21 114/2 121/7 121/22 128/25 136/22 147/10 148/11 151/22 152/21 158/23 166/19 168/19 174/24 175/1 175/6	lots [1] 166/14 loved [1] 125/1 lower [1] 154/2 Lowther [1] 86/4 Lowther's [2] 85/24 86/3 lucky [2] 64/19 65/11 lumpy [1] 57/23 lunch [2] 96/13 104/17 lying [1] 113/10	
letters [4] 100/2 132/6 155/12 156/3	listed [2] 141/4 141/18	looked [16] 33/23 35/22 52/11 52/11 52/12 60/6 71/17 81/4 89/4 104/17 120/13 124/10 150/18 155/11 155/13 175/14	M	
letters/parcels [1] 155/12	listing [1] 14/2	looking [41] 5/1 8/13 11/1 14/7 23/20 24/1 30/2 30/13 34/4 34/4 34/7 35/3 40/8 41/3 44/8 50/4 50/5 52/23 59/18 84/5 86/15 92/9 101/17 107/24 117/23 120/4 120/14 122/11 129/17 130/6 134/18 134/20 136/4 149/23 155/9 166/18 167/8 167/19 168/12 168/13 168/14	machines [2] 129/9 129/19 made [38] 7/25 10/10 20/14 21/6 27/12 27/13 45/10 46/20 61/22 65/22 66/7 70/15 72/6 73/25 80/4 88/14 92/15 98/19 101/23 102/21 105/12 107/7 109/1 114/7 116/8 117/3 117/11 118/23 121/4 121/11 121/12 122/5 127/9 131/17 141/11 147/1 160/4 160/11 magazine [4] 18/12 22/18 22/22 77/25 mail [78] 127/23 128/2 128/2 128/11 128/14 128/15 128/16 128/18 129/1 129/12 129/13 131/19 132/1 137/2 137/13 137/18 139/3 139/19 142/15 142/21 143/15 143/20 148/12 148/15 148/19 148/21 148/25 149/2 149/15 149/20 149/21 149/21 152/3 152/17 153/24 155/12 156/8 156/20 156/24 157/24 158/11 158/13 159/11 159/15 160/4 160/8 160/18 160/22 160/25 162/22 164/3 166/5 166/25 168/4 168/8 168/10 168/13 168/16 168/20 168/20 169/13 169/24 170/4 170/9 171/2 171/4 171/9 171/19 171/22 171/25 173/1 173/15 173/17 173/19 174/12 174/13 174/14 174/15 Mail's [3] 131/21	
level [15] 49/18 78/18 91/6 131/8 136/3 137/6 155/7 155/18 163/12 164/16 166/19 168/17 169/3 170/17 174/9	lit [1] 99/15	looks [10] 59/21 74/9 81/14 95/15 153/12 168/2 168/19 169/15 171/11 173/2	managed [2] 139/6 155/5 management [21] 108/3 108/22 109/18 139/17 139/21 140/8 151/22 151/24 152/5 152/5 152/8 152/10 152/19 154/21 154/22 154/22 155/1 155/2 166/6 166/7 167/15 manager [15] 17/22 17/22 17/24 18/4 18/6 18/8 18/17 27/23 29/19 32/8 38/17 47/4 84/10 95/9 121/3 managing [3] 89/25 145/21 155/3 Mandy [3] 21/9 21/15 23/12 manner [1] 10/12 manuals [1] 12/7 many [15] 24/14 25/4 30/23 58/10 62/18 73/15 90/6 95/25 120/13 135/18 138/5 139/6 139/6 149/24 165/5 March [4] 20/22 26/3 80/9 128/20	
levels [1] 139/24	litigation [7] 19/22 97/9 97/21 97/22 101/3 111/3 111/4	Lord [1] 28/22	magazine [4] 18/12 22/18 22/22 77/25 mail [78] 127/23 128/2 128/2 128/11 128/14 128/15 128/16 128/18 129/1 129/12 129/13 131/19 132/1 137/2 137/13 137/18 139/3 139/19 142/15 142/21 143/15 143/20 148/12 148/15 148/19 148/21 148/25 149/2 149/15 149/20 149/21 149/21 152/3 152/17 153/24 155/12 156/8 156/20 156/24 157/24 158/11 158/13 159/11 159/15 160/4 160/8 160/18 160/22 160/25 162/22 164/3 166/5 166/25 168/4 168/8 168/10 168/13 168/16 168/20 168/20 169/13 169/24 170/4 170/9 171/2 171/4 171/9 171/19 171/22 171/25 173/1 173/15 173/17 173/19 174/12 174/13 174/14 174/15 Mail's [3] 131/21	
liable [1] 29/1	little [9] 4/3 8/21 9/8 10/4 47/21 78/17 94/14 107/5 108/15	Lord Justice [1] 28/22	managed [2] 139/6 155/5 management [21] 108/3 108/22 109/18 139/17 139/21 140/8 151/22 151/24 152/5 152/5 152/8 152/10 152/19 154/21 154/22 154/22 155/1 155/2 166/6 166/7 167/15 manager [15] 17/22 17/22 17/24 18/4 18/6 18/8 18/17 27/23 29/19 32/8 38/17 47/4 84/10 95/9 121/3 managing [3] 89/25 145/21 155/3 Mandy [3] 21/9 21/15 23/12 manner [1] 10/12 manuals [1] 12/7 many [15] 24/14 25/4 30/23 58/10 62/18 73/15 90/6 95/25 120/13 135/18 138/5 139/6 139/6 149/24 165/5 March [4] 20/22 26/3 80/9 128/20	
liaise [2] 112/6 151/3	live [3] 75/16 77/11 107/22	loss [8] 46/16 46/21 51/1 51/8 51/9 92/7 92/17 132/25	managed [2] 139/6 155/5 management [21] 108/3 108/22 109/18 139/17 139/21 140/8 151/22 151/24 152/5 152/5 152/8 152/10 152/19 154/21 154/22 154/22 155/1 155/2 166/6 166/7 167/15 manager [15] 17/22 17/22 17/24 18/4 18/6 18/8 18/17 27/23 29/19 32/8 38/17 47/4 84/10 95/9 121/3 managing [3] 89/25 145/21 155/3 Mandy [3] 21/9 21/15 23/12 manner [1] 10/12 manuals [1] 12/7 many [15] 24/14 25/4 30/23 58/10 62/18 73/15 90/6 95/25 120/13 135/18 138/5 139/6 139/6 149/24 165/5 March [4] 20/22 26/3 80/9 128/20	
liaison [1] 111/24	local [1] 157/16	loss-making [1] 132/25	managed [2] 139/6 155/5 management [21] 108/3 108/22 109/18 139/17 139/21 140/8 151/22 151/24 152/5 152/5 152/8 152/10 152/19 154/21 154/22 154/22 155/1 155/2 166/6 166/7 167/15 manager [15] 17/22 17/22 17/24 18/4 18/6 18/8 18/17 27/23 29/19 32/8 38/17 47/4 84/10 95/9 121/3 managing [3] 89/25 145/21 155/3 Mandy [3] 21/9 21/15 23/12 manner [1] 10/12 manuals [1] 12/7 many [15] 24/14 25/4 30/23 58/10 62/18 73/15 90/6 95/25 120/13 135/18 138/5 139/6 139/6 149/24 165/5 March [4] 20/22 26/3 80/9 128/20	
lies [1] 152/16	locking [1] 105/7	losses [27] 2/16 27/1 27/9 27/14 27/19 27/20 29/13 29/25 31/6 32/2 32/3 32/16 34/8 47/25 48/1 51/21 51/24 52/2 52/18 53/9 66/13 92/14 116/7 119/11 120/5 121/15 175/9	managed [2] 139/6 155/5 management [21] 108/3 108/22 109/18 139/17 139/21 140/8 151/22 151/24 152/5 152/5 152/8 152/10 152/19 154/21 154/22 154/22 155/1 155/2 166/6 166/7 167/15 manager [15] 17/22 17/22 17/24 18/4 18/6 18/8 18/17 27/23 29/19 32/8 38/17 47/4 84/10 95/9 121/3 managing [3] 89/25 145/21 155/3 Mandy [3] 21/9 21/15 23/12 manner [1] 10/12 manuals [1] 12/7 many [15] 24/14 25/4 30/23 58/10 62/18 73/15 90/6 95/25 120/13 135/18 138/5 139/6 139/6 149/24 165/5 March [4] 20/22 26/3 80/9 128/20	
light [1] 106/7	log [26] 23/17 23/24 24/7 24/12 28/18 30/1 36/12 36/13 38/11 52/25 65/17 70/6 71/8 71/24 71/25 75/17 77/19 77/20 98/25 98/25 107/9 110/1 117/15 118/14 118/16 119/16	lost [5] 48/17 48/21 68/5 105/24 106/4	managed [2] 139/6 155/5 management [21] 108/3 108/22 109/18 139/17 139/21 140/8 151/22 151/24 152/5 152/5 152/8 152/10 152/19 154/21 154/22 154/22 155/1 155/2 166/6 166/7 167/15 manager [15] 17/22 17/22 17/24 18/4 18/6 18/8 18/17 27/23 29/19 32/8 38/17 47/4 84/10 95/9 121/3 managing [3] 89/25 145/21 155/3 Mandy [3] 21/9 21/15 23/12 manner [1] 10/12 manuals [1] 12/7 many [15] 24/14 25/4 30/23 58/10 62/18 73/15 90/6 95/25 120/13 135/18 138/5 139/6 139/6 149/24 165/5 March [4] 20/22 26/3 80/9 128/20	
like [40] 2/1 2/5 2/12 2/19 3/23 4/3 6/11 7/7 12/25 14/11 38/22 49/14 53/4 61/6 78/17 81/8 81/14 83/21 89/12 92/17 96/4 96/13 98/6 101/5 107/25 130/7 130/10 130/19 133/4 141/2 147/20 160/22 161/7 162/23 169/15 169/16 171/5 171/11 172/5 173/2	logs [15] 59/14 59/18 59/22 60/1 68/3 69/25 70/1 70/1 74/11 74/11 75/24 105/8 105/10 105/12 105/25	lot [28] 9/24 12/6 24/13 37/25 57/3 68/6 77/16 84/22 89/13	managed [2] 139/6 155/5 management [21] 108/3 108/22 109/18 139/17 139/21 140/8 151/22 151/24 152/5 152/5 152/8 152/10 152/19 154/21 154/22 154/22 155/1 155/2 166/6 166/7 167/15 manager [15] 17/22 17/22 17/24 18/4 18/6 18/8 18/17 27/23 29/19 32/8 38/17 47/4 84/10 95/9 121/3 managing [3] 89/25 145/21 155/3 Mandy [3] 21/9 21/15 23/12 manner [1] 10/12 manuals [1] 12/7 many [15] 24/14 25/4 30/23 58/10 62/18 73/15 90/6 95/25 120/13 135/18 138/5 139/6 139/6 149/24 165/5 March [4] 20/22 26/3 80/9 128/20	
likely [2] 117/11 134/14	London [1] 93/12		managed [2] 139/6 155/5 management [21] 108/3 108/22 109/18 139/17 139/21 140/8 151/22 151/24 152/5 152/5 152/8 152/10 152/19 154/21 154/22 154/22 155/1 155/2 166/6 166/7 167/15 manager [15] 17/22 17/22 17/24 18/4 18/6 18/8 18/17 27/23 29/19 32/8 38/17 47/4 84/10 95/9 121/3 managing [3] 89/25 145/21 155/3 Mandy [3] 21/9 21/15 23/12 manner [1] 10/12 manuals [1] 12/7 many [15] 24/14 25/4 30/23 58/10 62/18 73/15 90/6 95/25 120/13 135/18 138/5 139/6 139/6 149/24 165/5 March [4] 20/22 26/3 80/9 128/20	
limited [53] 38/8 41/9 48/3 99/5 112/10 116/20 128/23 131/4 131/7 131/9 131/18 133/13 133/17 133/21 133/23 134/1 134/10 135/7 135/9 137/5 137/19 137/20 137/21 140/8 141/3 142/7 142/17 144/13 144/17 144/21 146/4 148/25 152/21 152/23 153/1 153/2 153/5 153/14 155/6 155/10 155/20 156/14 157/20 157/21 158/10 164/9 164/14 168/23 171/16 173/5 173/10 173/22 174/21	long [16] 26/18 58/7 65/19 72/4 72/8 74/25 129/17 129/24 145/17 150/3 157/17 159/21 161/7 162/1 162/1 168/15		managed [2] 139/6 155/5 management [21] 108/3 108/22 109/18 139/17 139/21 140/8 151/22 151/24 152/5 152/5 152/8 152/10 152/19 154/21 154/22 154/22 155/1 155/2 166/6 166/7 167/15 manager [15] 17/22 17/22 17/24 18/4 18/6 18/8 18/17 27/23 29/19 32/8 38/17 47/4 84/10 95/9 121/3 managing [3] 89/25 145/21 155/3 Mandy [3] 21/9 21/15 23/12 manner [1] 10/12 manuals [1] 12/7 many [15] 24/14 25/4 30/23 58/10 62/18 73/15 90/6 95/25 120/13 135/18 138/5 139/6 139/6 149/24 165/5 March [4] 20/22 26/3 80/9 128/20	
line [14] 17/24 18/6 29/8 29/8 77/18 108/24 111/9 111/16 122/25 140/12 154/22 163/18 174/1 176/12	Longman [31] 1/6 1/6 1/9 1/12 1/13 3/25 11/1 18/17 53/22 72/18 81/15 95/23 100/21 103/19 110/8 110/14 111/18 113/2 113/9 114/22 120/21 122/3 122/14 122/21 123/12 124/24 125/9 125/11 125/12 125/20 178/2		managed [2] 139/6 155/5 management [21] 108/3 108/22 109/18 139/17 139/21 140/8 151/22 151/24 152/5 152/5 152/8 152/10 152/19 154/21 154/22 154/22 155/1 155/2 166/6 166/7 167/15 manager [15] 17/22 17/22 17/24 18/4 18/6 18/8 18/17 27/23 29/19 32/8 38/17 47/4 84/10 95/9 121/3 managing [3] 89/25 145/21 155/3 Mandy [3] 21/9 21/15 23/12 manner [1] 10/12 manuals [1] 12/7 many [15] 24/14 25/4 30/23 58/10 62/18 73/15 90/6 95/25 120/13 135/18 138/5 139/6 139/6 149/24 165/5 March [4] 20/22 26/3 80/9 128/20	
lines [8] 44/2 44/4 69/3 80/7 101/21 121/23 158/10 164/8	Longman's [2] 87/16 95/16		managed [2] 139/6 155/5 management [21] 108/3 108/22 109/18 139/17 139/21 140/8 151/22 151/24 152/5 152/5 152/8 152/10 152/19 154/21 154/22 154/22 155/1 155/2 166/6 166/7 167/15 manager [15] 17/22 17/22 17/24 18/4 18/6 18/8 18/17 27/23 29/19 32/8 38/17 47/4 84/10 95/9 121/3 managing [3] 89/25 	

M	168/19 175/5 175/9 175/11 175/19	middle [3] 6/10 51/15 94/8	missing [2] 122/10 122/23	mother [2] 125/2 125/3
March 2002 [1] 128/20	mean [56] 9/11 9/17 9/20 11/6 11/10 13/17 13/20 20/1 20/8 22/6 28/11 28/22 30/11 34/9 49/16 54/22 63/7 65/4 69/5 71/15 73/2 79/25 79/25 83/18 85/11 88/24 90/18 92/20 94/12 99/2 113/16 130/15 134/11 135/10 135/11 137/22 137/23 138/4 139/9 140/9 145/25 155/8 156/1 157/4 157/11 158/3 160/14 161/13 161/14 168/16 168/18 168/21 169/20 174/24 174/25 175/14	Midlands [6] 75/15 75/23 76/3 76/25 77/6 77/22	mistaking [1] 39/21 mitigated [1] 163/4 mitigation [2] 28/2 28/11	Mountain [1] 23/8 move [14] 6/18 6/25 10/20 14/4 43/24 53/22 78/7 80/9 84/2 88/6 93/3 97/19 127/25 139/21
Mark [1] 38/16	means [4] 32/18 62/20 82/5 176/18	might [23] 13/3 22/7 29/24 36/9 38/10 44/18 53/10 69/24 70/4 80/6 85/10 86/5 87/16 98/7 101/11 109/11 109/14 113/14 113/14 119/22 119/23 122/19 125/3	mix [4] 135/15 137/15 138/9 166/10	moved [5] 4/9 60/10 143/10 144/9 156/8
marked [1] 122/12	meant [8] 37/7 45/22 66/18 71/18 79/5 80/17 82/3 82/4	mightn't [1] 28/12	Mm [4] 26/13 42/25 51/4 112/24	moving [10] 6/8 11/15 15/16 17/24 20/22 91/21 97/17 112/15 130/10 158/9
marker [1] 88/15	mechanism [1] 38/6	migrated [1] 155/10	Mm-hm [2] 26/13 42/25	Mr [131] 1/6 1/10 1/13 3/15 3/21 3/25 10/23 11/1 15/8 48/15 49/14 53/22 59/5 59/6 59/8 59/10 59/22 61/18 69/8 72/19 72/23 73/3 73/9 73/19 73/21 73/23 74/6 75/9 75/25 76/11 76/11 76/12 76/19 78/18 80/20 81/2 82/23 83/14 83/18 90/13 90/14 90/23 90/24 91/9 96/17 103/12 103/12 103/15 103/19 103/22 104/10 104/23 105/3 105/21 105/21 106/7 106/11 106/11 106/15 106/15 106/18 106/19 106/19 106/23 108/7 108/14 108/24 108/25 109/4 109/4 109/9 109/10 110/8 110/12 110/14 111/18 111/24 112/5 112/6 112/8 112/14 112/20 112/20 112/25 114/20 114/22 116/23 118/10 118/18 120/18 120/19 120/20 120/21 122/3 122/14 122/21 123/6 123/12 123/17 123/24 124/5 124/8 124/24 125/9 125/11 125/12 125/20 126/1 126/6 126/12 126/14 126/15 127/13 127/25 137/4 150/20 150/24 151/9 151/17 151/22 152/21 160/16 171/12 172/20 172/23 176/17 177/5 178/4 178/8 178/10 178/14
Marsh [1] 164/6	meet [3] 82/12 98/22 142/16	Mike [3] 139/3 153/3 158/12	modernisation [1] 131/22	MR BLAKE [4] 1/10 10/23 96/17 178/4
massive [4] 117/11 130/8 135/23 138/1	meeting [15] 39/1 39/5 75/13 87/18 98/14 98/17 99/8 99/10 129/1 133/12 139/18 166/25 169/16 169/24 170/19	Mike Hodgkinson [2] 153/3 158/12	modules [1] 12/7	Mr Cook [1] 160/16
material [10] 13/16 53/25 54/1 54/9 106/7 106/11 106/22 109/1 109/10 109/14	meetings [4] 144/23 168/23 176/4 176/7	Mills [7] 134/6 144/12 144/17 145/8 145/10 152/21 158/13	moment [9] 16/17 53/10 65/10 76/16 79/2 85/8 97/1 102/25 171/13	Mr Crozier [1] 137/4
matter [16] 2/15 32/19 33/20 46/17 53/23 55/23 59/14 62/17 73/22 87/11 97/15 121/18 124/24 157/18 159/2 164/11	meets [1] 166/7	Mills' [1] 144/21	Monday [1] 80/15	Mr Dunks [1] 114/20
matters [12] 5/8 35/14 42/22 46/6 55/25 72/19 97/8 116/1 121/8 124/16 124/18 165/1	member [3] 21/20 38/18 46/15	Milton [1] 11/22	money [21] 28/15 29/2 29/16 32/24 33/3 48/2 48/9 48/10 48/17 48/17 49/10 49/11 62/21 77/17 83/6 83/16 122/22 125/3 135/12 135/13 135/15	Mr Henry [4] 103/12 110/12 120/18 178/8
may [40] 2/3 14/21 16/8 22/24 22/25 24/18 24/22 27/10 28/3 28/11 30/19 31/14 32/22 34/13 36/1 39/24 39/25 52/1 52/1 58/4 80/16 81/12 81/18 94/15 95/15 97/4 100/10 103/21 104/19 110/5 111/14 126/11 130/24 150/22 154/9 154/10 160/12 170/21 172/7 172/13	members [3] 91/12 172/7 175/19	mind [8] 5/24 34/23 63/16 136/5 151/14 165/1 169/6 173/7	monies [2] 27/7 92/13	
maybe [16] 32/24 41/10 43/9 49/7 53/8 58/15 58/16 58/17 80/1 85/12 85/13 92/24 93/1 96/7 102/15 116/3	memo [4] 31/18 35/3 35/16 67/17	minimal [1] 45/1	months [8] 24/14 56/16 56/19 60/19 60/22 61/24 91/22 166/7	
McFarlane [1] 112/21	memory [3] 81/13 87/15 88/4	Minister [1] 142/23	Monthly [1] 27/10	
McLachlan [2] 75/14 107/19	mention [7] 2/19 46/20 47/5 73/25 77/5 104/4 171/5	ministers [2] 142/4 143/13	months [9] 24/3 28/4 32/5 39/8 39/12 51/3 117/4 118/24 118/24	
MD [1] 157/24	mentioned [17] 15/10 19/25 26/20 34/19 35/1 35/8 37/4 42/22 46/3 87/8 87/9 90/23 101/4 108/8 112/11 113/5 113/6	minute [5] 133/11 150/9 150/10 169/8 169/10	more [57] 6/9 9/5 9/22 10/4 12/18 14/14 19/2 19/18 23/20 23/25 25/6 30/9 30/12 31/13 33/1 38/21 45/7 50/13 51/24 52/16 61/17 65/4 76/22 79/1 79/6 79/24 80/1 80/3 83/4 83/7 84/1 93/25 94/18 95/10 96/12 96/17 102/2 102/3 111/6 112/6 116/4 118/15 120/4 120/11 120/11 120/15 133/4 133/4 136/18 136/20 142/5 142/5 144/1 148/14 149/14 165/7 171/24	
me [59] 1/3 5/3 10/24 11/7 14/19 19/2 20/16 21/11 22/18 29/19 31/4 38/21 45/8 45/18 49/11 50/6 51/12 52/7 54/15 63/1 63/4 75/21 76/2 78/23 79/4 80/23 81/12 81/21 90/13 92/18 95/6 96/25 98/7 99/21 102/18 103/7 104/15 112/14 113/6 121/2 124/3 124/8 125/24 136/7 145/13 148/7 148/14 150/16 151/9 153/9 158/13 162/14 164/11 168/16	merit [1] 50/1	misinterpreted [1] 24/4	morning [10] 1/3 1/5 26/21 33/24 50/19 53/11 117/18 117/21 118/6 148/22	
	merits [1] 36/3	mismatch [4] 112/16 112/22 113/18 113/22	most [13] 28/8 29/8 30/5 41/19 122/2 135/18 138/25 143/13 148/10 149/3 152/14 158/4 171/18	
	message [1] 74/8	Misra [34] 9/12 11/2 11/4 11/7 11/12 11/13 13/8 14/6 20/9 34/6 35/2 41/22 42/10 47/17 52/22 56/8 56/9 63/17 63/18 63/21 64/12 67/5 67/20 69/7 69/24 81/6 88/10 89/8 92/22 102/13 102/18 103/23 107/7 110/14		
	met [2] 130/4 142/19	Misra's [24] 6/13 9/4 15/2 18/24 34/15 35/2 37/22 44/9 44/17 53/23 73/16 75/12 78/22 81/5 84/22 87/20 87/21 93/11 111/22 112/23 113/21 113/23 114/3 119/2		
	Michael [2] 136/23 153/15	Misra-specific [1] 81/6		
	mid [1] 53/11			
	mid-morning [1] 53/11			

M	92/6 92/16 107/7 111/22 112/23 113/21 113/23 116/23 117/1 117/5 117/24 118/19 119/2 121/1 121/10 121/17 122/8 122/20 124/11	16/3 16/3 17/24 18/8 24/24 25/14 26/1 27/5 28/2 29/9 30/6 32/23 33/8 34/16 35/6 36/15 40/23 41/8 43/9 45/13 46/7 46/9 48/16 49/7 49/10 49/10 50/11 51/25 55/5 55/22 58/2 58/2 58/4 59/23 64/5 65/4 65/15 65/21 70/7 73/8 73/17 75/3 77/14 80/19 80/19 80/21 82/5 84/2 85/12 87/10 87/15 92/18 92/19 93/24 94/3 95/9 95/9 99/6 104/19 112/19 113/25 116/19 119/14 127/23 127/25 132/3 140/20 143/13 145/14 148/6 148/9 148/11 148/13 148/15 149/2 149/5 150/19 151/15 155/15 161/22 163/21 171/23 172/12 172/19 174/17 175/14 175/23	network [9] 4/19 4/25 129/10 135/13 136/1 138/10 138/11 138/12 138/12 neutral [1] 64/3 never [15] 2/22 30/17 30/21 30/21 45/5 45/21 45/25 66/1 73/1 88/4 101/23 116/13 144/7 149/21 150/3 new [8] 11/21 21/8 38/9 107/10 110/1 134/18 135/25 145/3 next [11] 10/10 21/5 44/25 45/4 91/21 94/19 100/19 110/11 131/10 155/15 176/12 nicking [1] 125/3 Nigel [5] 87/3 87/4 87/5 87/18 88/5 night [3] 82/12 83/4 148/22 nightmare [2] 98/5 101/9 no [157] 5/21 7/24 10/16 12/13 12/25 12/25 13/1 13/14 15/9 15/14 16/8 16/9 18/7 18/7 18/20 20/20 20/21 21/14 23/3 23/6 23/14 28/17 28/17 33/6 33/20 35/17 36/10 36/10 36/10 36/19 39/6 39/21 41/12 41/20 42/4 44/23 46/7 46/20 47/2 48/7 48/8 48/8 48/8 49/10 52/4 55/5 58/23 59/10 60/6 61/10 61/16 63/10 63/12 63/18 63/22 64/5 64/25 65/2 65/5 65/15 67/19 67/23 67/23 76/8 77/6 77/7 77/7 77/21 77/22 79/22 80/8 81/1 81/1 81/11 83/13 83/13 83/25 85/1 85/11 85/20 86/4 86/9 86/22 88/20 89/11 90/11 90/13 91/20 91/20 92/18 93/1 94/10 97/12 97/12 99/12 102/22 106/6 106/9 106/24 109/24 110/21 112/5 112/7 113/6 113/20 113/25 114/10 114/25 115/7 115/11 115/14 115/17 115/18 116/19 117/7 118/12 118/14 119/10 122/6 122/12 122/25 123/18 123/22 124/10 129/3 130/15 132/17 134/7 137/25	137/25 137/25 141/5 141/18 143/17 144/11 144/12 145/9 149/17 149/21 150/10 153/18 155/17 157/11 158/22 158/22 160/17 161/12 162/10 162/24 164/7 167/16 167/16 169/2 169/6 169/22 170/20 176/25 nobody [1] 35/22 Nolan [1] 134/15 non [29] 35/13 53/25 54/10 128/7 128/17 129/2 133/18 133/20 134/10 134/19 136/4 139/3 139/10 139/11 139/11 140/2 146/9 146/25 147/5 147/23 149/6 149/8 152/7 152/7 153/10 153/16 164/8 164/10 165/25 non-disclosure [1] 35/13 non-exec [2] 139/3 139/10 non-execs [2] 139/11 139/11 non-executive [10] 133/18 134/19 136/4 146/9 146/25 147/23 149/8 152/7 152/7 153/16 non-formal [2] 164/8 164/10 non-sensitive [2] 53/25 54/10 none [2] 51/8 104/6 nonetheless [1] 109/25 normal [2] 111/10 130/15 normally [5] 47/12 71/7 110/18 167/4 176/19 north [2] 85/13 85/16 not [167] 5/21 5/21 8/1 8/9 10/24 12/25 12/25 21/4 21/5 23/16 23/18 26/17 27/5 27/15 32/17 32/19 33/5 33/11 34/1 34/9 36/8 36/11 36/11 38/6 40/10 40/21 40/22 41/1 43/2 43/4 45/9 46/8 46/22 47/5 48/23 48/24 50/10 50/11 50/15 51/6 52/4 54/9 55/1 55/3 55/4 55/20 55/25 58/5 58/15 59/4 60/19 60/22 62/6 62/12 62/15 63/22 65/5 65/6 65/15 66/12 66/14 69/19 70/12
Mr Hosi [3] 48/15 49/14 118/18 Mr Hosi's [1] 116/23 Mr Jarnail [1] 112/20 Mr Jenkins [24] 3/15 3/21 15/8 72/19 72/23 73/9 78/18 80/20 81/2 82/23 83/14 83/18 103/22 105/21 105/21 106/7 106/15 106/23 108/7 108/25 111/24 112/6 112/8 112/14 Mr Jones [1] 105/3 Mr Leighton [13] 103/15 126/1 126/12 126/15 127/13 127/25 150/20 151/9 151/22 171/12 172/20 172/23 176/17 Mr Leighton's [2] 126/6 150/24 Mr Longman [20] 1/6 1/13 3/25 11/1 53/22 103/19 110/8 110/14 111/18 114/22 120/21 122/3 122/14 122/21 123/12 124/24 125/9 125/11 125/12 125/20 Mr Mills [1] 152/21 Mr Posnett [3] 59/5 59/8 59/22 Mr Singh [27] 59/6 59/10 61/18 73/21 73/23 74/6 75/9 75/25 76/11 76/19 90/13 90/23 104/23 106/11 106/15 106/18 106/19 108/14 108/24 109/4 109/9 118/10 123/6 123/17 123/24 124/5 124/8 Mr Stein [4] 103/12 120/19 120/20 178/10 MR STEVENS [4] 126/14 151/17 177/5 178/14 Mr Tatford [11] 76/11 76/12 90/14 90/24 91/9 104/10 106/11 106/19 109/4 109/10 112/5 Mr Tatford's [2] 73/3 73/19 Mr Wilson [2] 112/20 112/25 Mrs [40] 2/19 3/1 18/24 26/19 26/25 27/6 27/8 27/11 27/14 27/17 27/20 27/23 29/10 30/22 31/25 32/24 33/17 35/2 36/21 37/22 64/12	Mrs Allen [1] 118/19 Mrs Misra [2] 64/12 107/7 Mrs Misra's [8] 18/24 35/2 37/22 111/22 112/23 113/21 113/23 119/2 Mrs O'Dell [23] 2/19 3/1 26/25 27/6 27/8 27/11 27/14 27/17 27/20 27/23 29/10 30/22 31/25 32/24 33/17 36/21 92/6 92/16 117/1 121/10 121/17 122/8 122/20 Mrs O'Dell's [5] 116/23 117/5 117/24 121/1 124/11 Ms [15] 9/4 15/2 50/17 50/24 56/8 56/9 73/16 75/12 78/22 93/11 103/11 103/18 110/10 112/21 178/6 Ms Allen [1] 50/17 Ms Juliet [1] 112/21 Ms Misra [2] 56/8 56/9 Ms Misra's [6] 9/4 15/2 73/16 75/12 78/22 93/11 Ms O'Connell [1] 50/24 Ms Oliver [2] 103/11 110/10 much [38] 1/5 2/12 2/21 3/22 3/25 9/9 13/5 17/10 17/16 20/2 29/17 46/25 52/16 53/15 53/21 64/5 67/8 79/22 80/8 84/20 94/3 95/7 96/21 99/4 100/25 101/16 103/3 103/25 110/8 138/7 138/11 138/12 138/14 140/12 143/6 154/24 156/10 169/14 Muddeman [1] 27/24 muddying [1] 58/13 multiple [3] 27/13 118/23 121/12 must [9] 5/15 34/23 64/25 65/8 65/8 86/23 110/16 112/2 159/2 mustn't [1] 34/24 mute [1] 176/16 my [93] 3/6 5/16 10/6 14/19 15/17 15/24	myself [4] 87/12 90/23 106/19 132/4 myth [1] 117/12 N name [5] 1/11 16/5 25/16 54/3 126/16 named [1] 22/19 names [2] 82/13 90/23 national [1] 110/20 nature [2] 165/13 170/12 nearly [1] 148/18 necessarily [4] 42/2 43/2 137/12 153/18 necessary [5] 46/18 55/20 60/2 88/24 100/19 NED [1] 148/3 NEDs [1] 148/10 need [14] 55/16 71/11 80/13 83/20 87/11 97/4 98/19 118/16 119/16 128/15 134/7 150/4 150/8 155/4 needed [17] 10/11 17/13 23/23 24/15 25/21 34/17 44/4 45/18 53/1 55/12 55/25 57/13 60/9 69/24 83/15 135/2 146/3 needs [2] 105/25 150/10 negotiating [1] 138/13 neither [1] 117/2		

<p>N</p> <p>not... [104] 70/23 71/4 71/10 75/2 76/20 78/16 81/16 83/10 83/25 84/20 85/1 86/18 87/18 87/25 88/20 90/12 91/20 92/21 92/23 94/17 99/25 100/20 102/12 102/22 105/4 105/11 105/12 105/19 106/12 112/18 113/4 113/7 113/10 113/20 113/23 113/25 114/14 115/8 117/6 118/12 119/17 119/21 122/14 122/25 123/14 123/22 125/6 126/6 129/4 129/25 130/25 131/11 132/5 132/11 133/6 133/8 136/14 138/5 140/4 145/13 148/11 152/23 153/3 154/19 155/12 155/17 156/10 156/15 157/9 157/12 157/25 159/1 161/16 162/3 162/5 162/6 163/1 163/9 163/25 164/17 164/19 165/3 165/4 165/22 166/17 167/2 167/12 167/16 170/8 171/13 171/17 172/6 173/20 174/3 174/18 175/10 175/12 175/16 175/18 175/20 175/21 175/22 176/20 177/1</p> <p>note [5] 81/9 82/4 89/22 127/3 150/19</p> <p>noted [2] 40/16 170/9</p> <p>nothing [12] 12/23 31/4 49/4 58/11 84/1 102/8 120/17 154/18 165/9 165/12 165/15 169/5</p> <p>notice [4] 37/8 62/3 92/1 99/16</p> <p>noticed [1] 38/5</p> <p>notices [1] 49/3</p> <p>notified [1] 22/1</p> <p>notify [1] 24/21</p> <p>notifying [1] 32/4</p> <p>noting [1] 131/4</p> <p>November [12] 1/14 47/20 64/16 65/7 65/7 71/18 91/22 92/8 92/23 128/5 146/10 167/1</p> <p>November 2006 [1] 47/20</p> <p>November 2010 [1] 92/8</p> <p>now [59] 2/24 4/1 6/24 11/10 34/7 34/14</p>	<p>34/18 37/14 39/7 45/9 52/24 56/8 58/21 60/12 62/22 66/24 69/22 74/14 74/19 75/10 75/25 77/18 78/7 78/21 79/18 82/10 82/13 83/1 84/2 84/21 88/6 92/6 92/8 93/3 96/13 96/18 96/23 99/2 99/3 102/3 112/15 114/2 114/11 120/14 120/25 122/3 122/12 123/4 123/23 124/2 125/21 126/12 128/10 134/13 136/22 149/22 150/9 151/7 161/10</p> <p>number [42] 1/17 4/24 7/21 19/16 20/5 20/19 20/24 22/19 22/25 23/5 24/25 25/2 27/18 32/1 39/13 39/20 40/4 41/5 51/17 52/12 56/11 60/17 60/21 67/24 69/14 72/12 78/1 88/8 89/4 93/17 94/24 99/5 100/1 102/14 122/5 130/4 132/4 135/5 138/8 143/2 146/24 165/22</p> <p>number 1 [2] 138/8 143/2</p> <p>number 11 [1] 69/14</p> <p>numerous [1] 117/3</p> <p>O</p> <p>O'Connell [2] 50/14 50/24</p> <p>O'Dell [31] 2/19 3/1 26/19 26/25 27/6 27/8 27/11 27/14 27/17 27/20 27/23 29/10 30/22 31/25 32/24 33/17 34/5 36/21 66/25 67/10 67/21 92/6 92/9 92/16 92/22 117/1 120/21 121/10 121/17 122/8 122/20</p> <p>O'Dell's [5] 116/23 117/5 117/24 121/1 124/11</p> <p>objecting [1] 64/11</p> <p>obligations [5] 104/12 106/8 109/12 109/15 169/18</p> <p>obliged [1] 74/4</p> <p>obtain [10] 52/3 57/15 59/23 59/25 60/2 60/24 64/10 70/9 70/18 80/22</p> <p>obtained [9] 9/6 36/25 41/24 50/9 62/10 71/13 71/22</p>	<p>97/23 98/24</p> <p>obtaining [2] 62/19 101/1</p> <p>obvious [1] 163/9</p> <p>obviously [32] 7/13 8/18 9/15 9/24 17/8 24/21 30/24 34/20 63/3 63/13 64/12 91/8 102/5 105/17 114/5 134/14 136/16 137/14 138/16 139/6 143/14 148/2 152/11 159/18 161/10 161/25 162/17 162/20 163/10 165/5 175/15 176/4</p> <p>occasion [1] 18/25</p> <p>occasions [6] 27/18 30/23 32/1 45/14 45/16 103/21</p> <p>occur [3] 93/2 120/12 132/16</p> <p>occurred [6] 40/13 41/19 42/24 43/1 120/5 127/22</p> <p>October [12] 3/21 82/10 83/1 88/7 89/20 90/8 91/1 112/22 112/23 119/5 127/4 127/5</p> <p>odd [4] 48/13 50/23 161/4 170/20</p> <p>off [10] 21/18 61/12 131/20 142/24 142/25 143/9 154/25 166/8 168/3 171/7</p> <p>offence [1] 31/21</p> <p>offences [5] 159/4 159/10 159/14 174/6 174/13</p> <p>offender [3] 8/16 8/17 120/1</p> <p>offer [5] 27/12 81/2 82/6 96/10 121/11</p> <p>office [131] 2/20 4/4 4/7 4/9 4/23 7/15 11/24 14/21 14/25 23/7 23/24 27/7 27/9 27/17 27/25 28/1 28/4 28/16 28/24 31/12 33/11 38/8 46/14 48/3 48/11 48/15 48/20 49/22 50/21 50/21 51/2 62/12 62/16 66/11 66/16 68/19 68/24 69/2 69/9 69/11 70/12 71/4 77/2 77/22 80/21 82/2 84/14 84/24 85/1 85/19 87/23 89/14 98/5 99/17 100/2 100/21 101/2 123/20 125/4 128/23 129/10 130/6 131/4 131/7 131/9 131/18 131/22 133/12</p>	<p>133/17 133/20 133/23 133/25 134/3 134/9 135/7 135/9 135/12 135/22 137/5 137/19 137/20 137/21 140/8 141/2 142/7 142/17 143/4 143/16 144/12 144/17 144/21 145/14 145/21 146/3 148/20 148/25 149/15 152/21 152/23 153/1 153/2 153/4 153/14 155/6 155/10 155/20 156/3 156/14 156/18 156/20 157/20 157/21 158/10 159/3 164/9 164/14 168/9 168/14 168/23 171/2 171/9 171/15 171/16 171/22 172/3 172/4 172/8 173/5 173/10 173/22 174/21</p> <p>officer [16] 5/1 6/14 6/17 13/3 13/12 13/13 47/18 50/16 54/6 54/8 54/13 54/16 63/5 67/13 70/17 115/19</p> <p>Officer's [1] 13/16</p> <p>offices [7] 78/5 93/16 99/1 111/7 111/13 130/9 148/22</p> <p>official [2] 6/16 92/1</p> <p>officials [3] 142/23 143/1 143/5</p> <p>often [2] 135/15 142/16</p> <p>oh [4] 12/5 61/10 90/19 99/8</p> <p>okay [6] 86/16 109/25 121/20 121/22 121/23 143/18</p> <p>old [1] 38/22</p> <p>Oliver [4] 103/11 103/18 110/10 178/6</p> <p>on [247]</p> <p>once [4] 10/6 31/13 124/25 161/24</p> <p>one [72] 7/4 7/12 7/19 7/25 9/25 10/15 12/19 16/10 23/22 29/11 29/18 31/7 31/10 34/2 35/4 41/15 43/2 48/23 48/24 49/4 49/10 50/13 50/15 52/9 68/12 71/4 81/18 81/24 84/12 85/7 85/9 86/5 86/25 87/8 87/9 91/11 91/17 91/18 93/20 97/19 104/21 110/6 110/19 115/23 118/2 121/2 127/9 130/16 131/10 132/10 134/4 134/21 134/24 136/15 137/7 137/23 138/3 139/7 141/6</p>	<p>141/23 142/20 145/2 146/15 149/23 155/9 156/4 156/12 166/6 166/8 169/9 169/11 176/4</p> <p>ones [4] 24/15 30/8 60/4 154/18</p> <p>Online [3] 38/6 40/20 81/8</p> <p>only [31] 3/22 5/18 10/8 22/17 24/13 34/16 41/22 43/22 48/6 48/19 52/22 56/19 58/4 58/17 70/18 72/6 72/25 78/5 78/8 80/19 82/9 91/16 96/12 118/20 135/23 137/7 141/6 149/17 150/7 155/9 164/15</p> <p>onto [1] 45/19</p> <p>onus [1] 69/5</p> <p>onwards [2] 151/18 168/8</p> <p>ooh [3] 92/23 102/12 145/8</p> <p>open [4] 35/7 78/15 86/14 145/14</p> <p>open-plan [1] 145/14</p> <p>operated [1] 162/16</p> <p>operates [1] 62/14</p> <p>operation [2] 75/24 76/3</p> <p>operational [5] 97/7 156/5 163/12 164/16 165/21</p> <p>opinion [5] 22/2 22/15 24/20 25/22 25/23</p> <p>opportunity [3] 136/20 158/6 166/15</p> <p>opposed [1] 168/9</p> <p>opposite [2] 120/9 175/23</p> <p>or [189]</p> <p>order [6] 54/4 56/9 61/24 66/7 100/16 102/1</p> <p>organisation [23] 130/3 132/14 134/13 135/14 136/20 138/7 139/2 139/15 139/24 140/16 141/7 141/8 141/11 148/16 152/6 152/20 153/21 158/7 159/16 160/2 175/10 175/22 176/8</p> <p>organisations [13] 58/24 134/17 135/5 135/18 137/14 138/5 139/20 139/21 140/18 141/23 148/9 155/14 175/17</p> <p>organograms [1] 163/21</p>
---	---	---	--	--

O	68/1 84/8 96/23 97/23 99/14 100/14 101/21 104/17 116/12 121/4 129/9 129/10 135/4 138/1 139/22 149/12 173/4 175/2 overall [1] 38/19 overboarded [1] 150/1 overboarding [1] 149/24 overseeing [1] 144/24 oversight [10] 138/23 166/18 172/24 173/3 173/8 173/20 174/12 174/14 174/15 174/19 overwhelming [1] 135/8 own [15] 17/9 17/14 25/23 34/20 68/17 68/23 80/23 122/11 132/21 133/2 133/2 134/3 137/7 166/7 166/9 owned [2] 131/24 141/2 ownership [1] 157/10	95/20 95/21 107/5 116/12 133/14 page 20 [1] 127/1 page 24 [1] 2/11 page 25 [2] 158/25 168/5 page 26 [1] 5/25 page 27 [1] 3/8 page 3 [9] 20/24 51/10 59/11 70/21 95/2 95/2 95/14 98/11 99/23 page 30 [1] 127/6 page 37 [1] 6/8 page 39 [1] 3/14 page 4 [3] 61/7 129/3 146/22 page 40 [2] 6/18 6/19 page 42 [1] 114/8 page 46 [2] 6/25 33/22 page 47 [1] 1/19 page 5 [6] 27/3 27/3 37/23 94/6 100/14 167/23 page 6 [2] 120/24 170/3 page 7 [1] 131/1 page 9 [2] 82/20 82/22 paper [1] 131/4 papers [3] 31/20 174/25 175/4 paragraph [56] 2/8 2/9 2/21 3/13 3/15 5/12 6/1 6/2 6/8 6/11 6/18 6/19 6/25 7/1 7/2 8/6 10/25 11/8 11/16 13/7 26/1 30/13 30/16 33/23 33/23 33/24 33/25 41/21 42/8 43/25 44/22 44/25 46/11 59/1 66/20 68/2 69/17 71/2 73/6 73/7 73/8 81/5 81/6 81/16 100/13 105/2 105/18 106/20 112/12 114/8 121/23 127/1 158/24 168/5 168/7 168/21 paragraph 2 [1] 81/16 paragraph 23 [1] 66/20 paragraph 3 [1] 105/2 paragraph 38 [2] 5/12 127/1 paragraph 41 [1] 11/16 paragraph 46 [1] 33/24 paragraph 47 [1] 168/5 paragraph 48 [1]	158/24 paragraph 54 [2] 2/8 2/21 paragraph 56 [1] 6/1 paragraph 6 [2] 43/25 68/2 paragraph 71 [2] 6/8 13/7 paragraph 76 [2] 3/13 3/15 paragraph 77 [2] 6/18 6/19 paragraph 86 [4] 8/6 10/25 11/8 114/8 paragraph 97 [3] 6/25 7/2 33/23 paragraphs [7] 2/6 3/7 5/6 5/7 58/20 61/19 68/11 paragraphs 38 [1] 5/7 paragraphs 53 [1] 2/6 paragraphs 58 [1] 3/7 Paragraphs 9 [1] 68/11 parallel [1] 135/23 parcels [2] 155/12 174/15 Pardoe [2] 93/12 96/24 parent [1] 158/20 Parliamentary [1] 124/17 part [19] 11/11 11/13 12/4 13/2 13/15 52/19 54/9 65/15 84/10 85/15 113/25 120/6 120/6 129/4 132/1 136/18 152/11 156/12 163/14 partial [1] 131/7 Participants [4] 103/1 103/10 150/22 151/5 participating [1] 125/15 particular [19] 15/10 16/23 22/11 33/4 42/1 42/9 56/1 62/15 70/23 76/17 81/25 85/13 95/5 105/6 105/18 132/7 132/23 153/13 172/1 particularly [8] 14/6 60/17 69/25 118/22 127/19 130/3 141/18 176/23 parts [3] 57/10 59/2 138/15 party [2] 162/10 162/12 passage [1] 110/4	passed [4] 29/20 51/21 121/4 160/12 past [1] 62/18 Pause [1] 125/23 pausing [4] 22/5 42/19 51/17 56/22 pay [4] 57/8 57/17 57/18 138/14 pay-up [1] 57/17 paying [1] 32/24 payment [1] 62/11 payments [4] 112/16 112/22 113/18 113/22 PEAK [1] 38/11 pedantic [1] 10/23 Penny [25] 14/9 14/10 14/18 15/18 15/18 16/14 38/1 39/1 76/21 76/23 78/11 78/11 78/12 78/23 79/2 80/10 93/5 104/1 104/2 107/16 108/18 108/21 109/17 109/17 111/25 penultimate [1] 7/1 people [39] 5/1 20/24 48/19 58/24 69/6 88/9 89/13 90/9 90/19 91/8 91/10 98/9 102/14 125/14 129/10 129/16 129/18 129/19 130/4 130/9 132/19 134/14 134/17 135/5 136/6 139/9 139/24 148/17 148/20 152/14 154/1 156/11 157/13 157/15 162/25 163/2 164/13 166/15 172/4 people's [1] 77/16 per [27] 24/14 29/6 29/21 50/11 56/16 56/19 60/19 60/21 60/21 61/24 135/1 135/15 135/15 138/4 138/5 148/13 148/15 155/22 156/15 163/25 167/12 168/2 168/18 169/14 171/1 171/10 174/3 performed [1] 102/2 perhaps [8] 47/14 56/12 71/10 82/20 96/14 96/18 103/1 137/17 period [29] 12/3 12/16 12/22 12/25 24/2 24/11 34/22 36/22 37/2 37/13 50/7 51/3 51/22 58/1 58/1 58/7 61/23 62/1 71/6 72/5 74/25 115/9 134/2 135/20 142/20 149/12 159/21 162/1 175/5
----------	--	--	--	---

P	26/17 26/23 27/3 31/17 31/17 32/15 37/19 37/23 38/16 41/13 44/9 44/10 44/15 47/20 47/22 49/8 50/24 53/13 55/7 56/3 59/11 59/19 61/3 61/7 61/9 61/11 61/13 62/1 64/15 66/4 66/23 67/24 68/1 68/4 68/9 70/9 70/21 70/21 74/7 74/7 75/10 75/19 75/21 78/20 81/3 81/9 82/24 82/25 84/8 85/21 87/10 87/12 89/18 89/22 91/21 94/6 95/2 96/22 96/22 96/23 96/25 97/3 100/6 100/14 100/24 103/24 103/24 104/14 104/22 106/16 107/1 107/3 107/5 107/15 108/12 108/15 108/20 110/11 120/22 120/23 123/2 123/4 123/23 126/15 127/5 128/25 129/3 131/1 131/2 133/11 133/14 146/6 146/21 146/23 150/12 158/23 166/20 167/23 167/24 169/23 169/23 170/3 pm [5] 103/4 103/6 150/13 150/15 177/10	70/21 POL00050750 [1] 53/24 POL00052234 [1] 59/19 POL00053527 [1] 64/15 POL00054008 [1] 66/4 POL00054041 [2] 44/10 116/10 POL00054430 [1] 20/22 POL00054557 [1] 74/7 POL00055073 [1] 108/13 POL00055590 [1] 88/6 POL00056857 [1] 93/4 POL00056927 [1] 96/22 POL00056928 [1] 93/21 POL00057175 [1] 99/22 POL00095531 [1] 127/3 POL00105147 [2] 26/17 120/23 POL00107817 [1] 56/3 POL00143570 [2] 31/17 123/3 POL00167129 [1] 78/20 POL00167138 [1] 17/18 POL00167159 [1] 104/20 POL00169170 [1] 89/19 POL00175703 [1] 103/24 POL00175972 [1] 84/5 POL00176080 [1] 91/21 police [5] 57/10 57/13 59/1 124/13 160/13 policies [2] 111/16 159/6 poor [1] 124/20 popped [1] 172/19 Porters [2] 16/19 17/14 position [8] 5/22 100/8 105/4 133/17 135/6 136/9 161/14 162/6 positions [1] 146/25 positive [2] 58/6 75/7	Posnett [7] 17/22 56/11 59/5 59/8 59/22 61/4 63/8 possibility [5] 29/23 30/19 38/14 122/7 124/4 possible [13] 30/11 46/16 49/13 52/7 65/14 70/9 92/2 95/7 98/24 100/17 100/25 105/5 166/22 possibly [2] 37/10 105/23 post [120] 2/20 4/4 4/23 14/25 23/24 27/7 27/9 27/17 27/25 28/1 28/4 28/15 28/24 33/11 38/8 46/14 48/2 48/10 48/14 48/20 50/21 62/12 62/16 66/11 66/16 68/19 68/24 69/1 69/9 69/11 70/12 71/4 77/1 77/22 82/2 84/14 84/23 85/1 85/19 87/23 89/14 93/16 98/4 99/1 99/16 100/2 100/21 101/2 123/19 125/4 128/23 129/10 130/6 131/3 131/6 131/8 131/18 131/22 133/12 133/17 133/20 133/23 133/25 134/3 134/9 135/6 135/8 135/12 135/22 137/5 137/19 137/20 137/21 140/8 141/2 142/7 142/17 143/4 143/16 144/12 144/17 144/21 145/21 146/3 148/25 149/15 152/21 152/23 152/25 153/2 153/4 153/14 153/15 155/6 155/9 155/20 156/2 156/14 156/18 156/20 157/20 157/21 158/10 159/3 164/9 164/13 168/9 168/14 168/23 171/9 171/15 171/16 171/22 172/3 172/3 172/8 173/5 173/9 173/22 174/20 postmasters [1] 22/20 postponed [1] 71/19 potential [9] 19/24 37/17 41/6 67/3 97/10 97/22 110/24 111/13 114/6 potentially [8] 16/6 39/2 39/10 39/15 43/7 66/21 106/4 113/13 pouches [2] 83/7 83/17 pounds [1] 62/18	Power [1] 149/8 practical [1] 108/2 practice [2] 47/14 164/11 practices [2] 140/17 159/5 pre [1] 155/15 pre-empted [1] 155/15 precise [3] 23/25 62/9 131/12 precisely [2] 5/20 120/8 prefaced [1] 141/15 prepared [2] 113/12 138/14 preparing [2] 44/16 126/18 present [5] 23/13 47/19 50/16 80/5 129/3 presented [3] 34/19 114/16 142/22 preservation [2] 100/4 100/12 President [1] 128/4 pressing [2] 45/6 116/14 pressure [1] 116/20 presumably [3] 83/18 90/8 97/22 presume [2] 21/25 75/9 pretty [9] 49/16 58/4 135/17 138/7 154/24 156/6 156/10 164/5 169/14 prevent [2] 75/4 158/19 previous [8] 18/14 41/15 42/2 42/3 71/7 89/3 105/18 116/6 previously [5] 19/8 42/22 52/14 57/24 115/11 primarily [1] 136/5 principal [1] 99/24 principally [1] 13/25 principle [2] 131/14 152/5 prior [5] 12/3 12/5 41/5 87/21 144/21 priority [1] 135/8 Prison [1] 124/12 Private [1] 70/25 probability [1] 159/23 probably [29] 17/13 26/8 30/5 53/1 57/4 57/25 58/2 61/17 78/5 78/14 82/17 102/18 106/9 110/20 119/13 134/4 134/11 140/25 141/13 142/6 142/18
----------	--	---	---	--

P	progressed [1] 15/7 progressing [1] 91/5 prohibitive [1] 36/20 projects [1] 130/5 prompted [2] 5/3 106/4 promptly [1] 126/5 prone [2] 43/8 43/9 proof [1] 88/13 proper [2] 154/17 163/3 properly [2] 8/11 10/17 propose [1] 176/13 proposing [1] 124/5 prosecute [10] 32/21 33/5 117/6 117/7 117/10 160/3 161/3 161/20 164/18 174/6 prosecuted [5] 66/14 123/15 159/3 159/14 172/4 prosecuting [1] 123/9 prosecution [24] 5/11 18/16 18/22 20/9 22/17 32/12 33/2 54/9 56/20 57/8 66/22 77/3 102/13 117/14 123/11 159/9 160/7 169/7 172/25 173/4 173/9 173/21 174/13 174/20 prosecutions [22] 123/21 138/23 138/24 144/6 158/23 160/16 160/19 162/13 163/6 163/7 164/24 165/12 165/17 168/18 168/23 169/3 169/8 169/19 170/17 172/1 175/3 175/9 prosecutor [1] 161/15 protecting [2] 170/3 170/14 protection [1] 170/16 protocol [1] 53/8 prove [3] 27/6 83/6 118/2 proven [3] 31/10 34/10 102/9 provide [24] 28/2 28/11 28/12 40/24 51/23 55/16 55/21 61/24 63/18 63/20 64/11 69/12 71/9 73/11 73/25 76/10 76/20 81/23 105/9 105/12 108/3 108/22 109/18 172/8 provided [24] 10/21 12/15 14/13 21/4 28/17 36/20 38/8 41/6 55/1 55/3 57/2 63/23	64/14 70/6 71/7 72/1 72/7 76/18 115/8 115/23 118/14 162/3 162/4 176/6 providing [9] 13/9 23/17 25/23 55/24 63/17 70/12 71/1 83/11 83/21 proving [1] 32/10 provision [1] 97/15 public [2] 5/17 5/23 publications [1] 24/22 publicity [1] 117/12 publicly [2] 141/2 141/3 published [2] 4/1 127/14 pull [1] 124/25 pulled [1] 95/25 purely [2] 40/14 169/12 purpose [4] 20/11 20/21 45/11 131/12 purposes [2] 40/15 50/2 pursue [1] 44/4 pursuing [2] 69/3 168/24 put [26] 5/16 37/3 37/15 45/17 53/4 57/2 58/15 64/13 82/12 88/23 91/17 91/18 116/2 116/11 119/25 120/1 120/7 125/14 129/18 139/22 150/4 154/10 165/18 166/12 172/5 177/2 puts [1] 153/12 putting [7] 19/22 37/1 37/12 69/10 91/11 110/23 154/23	44/19 68/22 71/12 150/18 151/16 172/20 176/12 questions [16] 19/12 26/11 28/3 40/2 50/17 69/10 102/25 103/9 103/19 112/19 125/10 125/14 127/16 127/25 150/23 172/16 quick [2] 38/7 125/18 quickly [6] 23/16 65/10 68/1 82/8 100/24 114/13 quite [11] 37/25 50/15 56/18 62/17 68/6 71/16 84/21 90/9 92/8 93/17 147/19 quota [4] 56/18 57/10 57/17 58/9 quotation [1] 62/10 quote [1] 57/15	53/1 59/4 65/2 67/18 69/22 69/24 71/17 74/25 80/8 82/4 82/9 84/3 88/3 88/21 91/9 96/16 112/5 117/9 133/1 134/21 136/11 136/11 137/11 137/19 138/18 139/13 145/22 152/25 155/8 160/1 167/16 reason [13] 10/1 30/22 35/12 35/19 47/12 58/9 72/4 136/18 141/5 162/16 162/24 171/18 173/13 reasonable [5] 55/4 57/9 68/19 68/25 69/3 reasonableness [1] 54/20 reasons [7] 1/7 4/24 5/4 46/20 47/6 82/10 154/19 recall [74] 2/18 6/4 12/2 12/24 13/6 20/7 21/14 24/5 25/3 29/4 42/17 50/9 60/18 71/13 73/23 74/5 79/8 79/22 79/22 80/6 80/19 81/22 82/3 86/20 86/22 87/4 88/2 88/5 88/20 91/18 91/20 94/9 104/24 105/16 106/3 106/6 106/10 106/21 107/11 108/5 109/8 109/9 109/13 110/6 112/13 113/4 113/4 113/20 121/16 129/24 129/25 130/1 137/22 142/18 144/3 145/17 147/9 147/11 147/19 152/25 155/8 155/22 155/23 159/5 163/15 167/15 168/2 168/15 168/22 169/16 169/20 169/21 169/22 171/4 recap [1] 26/3 receipts [4] 112/16 112/21 113/18 113/22 receive [5] 20/12 63/7 94/17 94/18 109/4 received [14] 20/12 27/22 50/19 65/16 67/16 70/10 86/17 86/23 91/25 94/15 103/22 104/10 108/17 145/3 receiving [3] 2/18 86/20 125/5 recent [4] 32/12 87/10 87/18 123/11 recently [1] 38/5 rechecking [1] 39/16
	Q			
	qualifications [2] 134/20 167/20 quality [1] 68/18 quantify [1] 40/24 queries [1] 84/18 question [22] 10/25 25/8 28/22 31/13 39/25 63/15 64/10 69/21 71/6 76/15 101/20 102/20 105/14 105/17 108/4 123/13 123/19 124/21 125/2 155/15 161/18 174/17 questionable [1] 68/18 Questioned [10] 1/10 103/18 110/12 120/20 126/14 178/4 178/6 178/8 178/10 178/14 questioning [8] 40/6	raise [3] 47/1 47/2 49/18 raised [12] 26/11 28/1 28/5 28/23 30/22 38/11 40/3 87/17 111/7 111/14 139/15 165/12 raising [2] 71/21 98/11 ran [1] 156/5 Rang [1] 81/15 rather [6] 74/23 76/13 137/11 148/13 151/7 171/9 raw [3] 61/1 114/25 115/2 re [2] 18/11 87/9 reaches [1] 100/6 reacted [1] 23/16 read [23] 9/17 9/18 12/7 21/21 31/20 47/21 49/20 52/4 61/19 63/1 81/11 86/25 88/21 94/14 105/1 114/10 127/4 152/3 153/17 159/20 170/20 171/4 171/10 reader [1] 42/8 readily [1] 39/20 reading [3] 59/23 81/18 81/24 real [5] 29/23 88/1 101/8 132/8 169/2 realise [2] 6/12 102/22 realising [1] 116/5 reality [2] 138/8 157/19 really [39] 17/10 17/15 22/14 25/20 26/2 37/6 45/10 51/14		

R	27/1 30/2 36/13 59/7 60/4 65/18 72/2 72/3 110/2 110/5 115/12 117/15	relying [1] 115/22 remain [1] 125/19 remember [33] 4/17 12/18 12/20 14/10 18/19 19/3 21/16 22/22 25/25 44/15 50/6 74/3 76/4 88/25 88/25 104/7 105/17 111/11 118/22 125/4 125/5 125/7 135/21 138/6 140/25 143/24 147/4 147/8 147/17 147/23 154/7 170/7 170/25	56/18 56/19 56/20 57/18 57/19 58/3 58/5 60/11 65/8 66/5 66/8 66/10 66/23 66/24 67/5 67/8 67/9 67/12 67/13 68/10 68/11 68/15 69/15 70/7 71/19 74/18 75/11 104/7 104/9 107/12 requested [15] 13/20 14/20 24/8 28/18 36/17 57/1 57/14 58/7 62/9 71/5 71/10 71/25 73/24 94/2 101/6 requesting [5] 68/2 75/1 75/14 75/23 99/18 requests [37] 9/23 9/25 14/12 24/13 56/21 57/4 57/9 57/11 57/12 57/13 57/15 57/22 59/3 59/7 59/12 64/9 65/16 67/25 72/13 72/13 73/1 73/14 73/16 74/3 77/8 77/15 88/12 93/17 93/19 96/6 98/16 99/5 107/8 107/9 107/20 109/25 110/5 require [1] 97/17 required [6] 16/18 61/25 87/13 100/15 148/24 149/14 requirements [1] 82/16 requires [1] 81/21 requiring [1] 45/7 reservations [1] 29/21 residential [5] 11/22 11/25 12/2 12/3 13/5 resolution [2] 21/20 99/25 resolved [1] 130/12 respect [15] 8/12 39/2 55/24 64/23 73/5 75/23 81/23 82/23 84/23 101/2 112/25 152/8 157/8 174/20 175/24 respond [4] 73/1 73/10 73/11 88/24 respond' [1] 72/24 responded [3] 15/8 15/18 69/19 responding [1] 23/11 response [12] 21/22 23/11 25/9 40/23 52/8 58/16 75/7 76/23 105/14 108/17 141/16 170/21 responses [1] 100/24 responsibilities [1]	8/22 responsibility [7] 116/1 131/24 133/22 152/16 155/2 173/8 174/7 responsible [5] 54/14 139/17 163/13 164/17 164/23 rest [3] 70/6 131/25 132/22 restriction [1] 54/4 result [5] 27/15 39/15 90/10 92/13 121/15 resulted [2] 43/14 77/3 resulting [1] 165/11 resume [1] 150/11 Retail [2] 29/7 29/8 retention [2] 111/10 111/16 rethink [1] 52/14 retrieval [5] 38/6 40/18 40/21 62/6 97/25 retrieve [5] 23/8 63/13 94/1 96/4 98/6 retrieved [1] 62/8 retrieving [4] 94/4 94/10 98/3 98/21 return [3] 126/9 176/18 176/24 reveals [1] 46/15 revenue [6] 135/16 137/23 137/25 137/25 138/4 138/6 review [7] 9/13 21/6 30/6 47/8 60/20 112/12 157/1 reviewed [5] 2/13 8/7 11/9 74/14 85/24 revised [1] 119/4 ridiculously [1] 72/4 right [55] 4/6 4/10 4/14 5/9 11/10 11/14 18/5 19/6 26/16 28/14 28/21 33/15 43/17 43/23 45/19 47/3 59/4 60/12 67/7 67/11 67/19 68/8 74/22 90/1 95/5 95/6 96/20 102/15 103/2 105/2 105/20 107/2 107/14 109/2 112/15 113/14 113/16 114/8 116/9 118/8 118/11 121/6 121/22 124/25 125/21 138/9 140/21 141/5 141/8 141/16 160/20 171/12 172/6 177/4 177/5 ring [1] 113/8 ringing [1] 29/12 rise [2] 31/21 130/22 risk [52] 17/22 18/3
recipient [1] 86/18 recognise [1] 37/14 recognised [1] 150/24 recognition [1] 66/18 recollection [9] 73/18 107/18 113/6 160/14 160/15 163/21 169/6 170/18 171/8 recollections [1] 159/1 recommend [1] 134/16 recommendation [1] 86/12 record [3] 40/11 43/22 126/23 recorded [1] 40/14 records [11] 40/10 40/12 40/13 40/19 94/2 96/5 98/4 98/4 101/5 101/6 114/15 recover [1] 92/13 recovered [1] 32/18 recovery [2] 33/2 97/11 recruited [1] 133/25 redactions [1] 44/10 reduced [1] 149/12 redundancy [1] 5/1 refer [6] 64/1 70/13 75/8 128/14 168/5 168/11 reference [11] 1/17 15/20 16/13 55/13 68/4 73/13 87/23 94/7 95/21 104/16 107/2 referred [8] 59/6 59/10 65/21 66/20 72/9 120/15 121/14 141/25 referring [11] 8/23 45/13 73/6 87/22 101/10 101/11 112/18 114/18 140/14 140/22 156/17 refers [12] 16/19 74/15 75/16 76/24 77/6 82/21 93/6 100/2 131/2 131/10 168/10 170/22 reflect [3] 101/19 119/6 172/12 reflected [1] 8/11 reflecting [2] 11/4 51/22 reflection [4] 8/8 9/5 9/19 58/21 reflections [2] 73/7 79/18 refresher [1] 12/15 refused [13] 24/12	regard [3] 6/5 76/6 76/17 regarding [13] 2/5 3/15 19/12 19/19 20/17 67/18 68/10 84/24 86/9 87/24 100/3 101/21 109/25 regards [9] 24/6 43/3 46/12 52/17 74/18 76/1 97/10 99/17 112/11 region [1] 49/4 register [3] 152/24 153/7 153/8 regrets [1] 114/10 regular [2] 110/19 144/22 regulated [1] 135/4 rejected [2] 24/8 69/20 rejection [1] 58/15 rejections [1] 65/21 relate [3] 72/20 87/16 168/8 related [6] 15/14 52/22 123/19 131/6 159/4 168/17 relates [5] 11/12 11/13 37/21 75/12 105/19 relating [8] 67/21 81/5 84/22 85/8 89/4 89/5 92/22 100/8 relation [18] 6/13 9/4 13/8 14/21 23/15 44/18 67/10 69/25 89/9 93/22 104/12 109/6 109/10 121/1 121/7 124/6 159/6 165/17 relationship [4] 78/18 144/16 144/20 145/18 relatively [3] 68/1 78/8 134/2 release [5] 107/10 108/3 108/22 109/18 110/1 released [1] 58/19 relevant [15] 7/4 7/12 7/14 7/20 7/22 8/4 8/21 8/21 33/4 34/3 34/6 62/2 98/9 140/7 159/5 reliability [5] 45/23 46/5 78/2 101/22 116/16 reliance [1] 68/17 relied [1] 163/7 reluctant [1] 63/20	rely [1] 115/22 remain [1] 125/19 remember [33] 4/17 12/18 12/20 14/10 18/19 19/3 21/16 22/22 25/25 44/15 50/6 74/3 76/4 88/25 88/25 104/7 105/17 111/11 118/22 125/4 125/5 125/7 135/21 138/6 140/25 143/24 147/4 147/8 147/17 147/23 154/7 170/7 170/25 remotely [1] 1/7 remove [3] 38/7 38/12 115/5 removed [1] 44/11 renewal [1] 143/20 reorganisation [1] 165/23 repeat [7] 25/8 68/9 68/15 124/20 144/19 150/2 162/19 repeated [1] 69/14 repeatedly [1] 121/17 rephrase [1] 164/11 replace [2] 136/12 138/2 replaced [1] 135/2 replacement [1] 81/21 reply [2] 87/11 120/2 replying [1] 65/10 report [18] 8/16 8/17 26/24 29/9 36/17 47/8 120/1 152/18 153/10 153/17 153/18 153/19 167/25 168/1 168/3 171/25 172/3 174/1 reported [6] 158/13 158/15 163/25 167/11 171/7 173/12 reporters [1] 171/1 reporting [12] 28/19 30/15 46/7 90/16 91/8 140/23 158/10 163/18 164/8 173/22 174/25 175/2 reports [3] 171/15 171/19 176/5 represent [3] 110/14 120/21 146/12 representations [1] 34/21 representative [2] 81/19 150/25 represents [1] 56/18 reproducible [1] 75/16 reputation [1] 149/2 reputational [1] 123/19 request [31] 56/14		

<p>R</p> <p>risk... [50] 84/15 84/25 85/2 86/14 87/25 139/19 151/22 151/24 152/5 152/8 152/10 152/11 152/12 152/13 152/18 152/24 153/4 153/6 153/8 153/9 153/10 153/17 153/18 153/19 153/23 154/9 154/10 154/12 154/20 155/1 155/9 155/10 155/11 155/18 155/20 156/7 166/5 166/24 167/4 167/14 167/17 167/17 168/13 169/24 173/16 173/19 174/11 174/18 175/25 176/1</p> <p>risks [13] 153/11 153/13 154/4 154/7 154/14 154/17 154/23 154/25 155/3 155/3 155/5 155/13 162/12</p> <p>RMG00000006 [1] 166/20</p> <p>RMG00000008 [1] 169/23</p> <p>RMG00000345 [1] 146/6</p> <p>Rob [2] 21/25 23/14</p> <p>robust [2] 20/20 66/12</p> <p>robustness [1] 101/22</p> <p>Rod [1] 89/19</p> <p>Rodric [1] 177/7</p> <p>role [17] 11/23 13/2 13/12 14/14 54/17 55/6 64/5 93/22 102/2 124/13 128/1 139/13 147/8 150/3 152/2 152/8 175/12</p> <p>roles [8] 17/25 145/2 146/24 148/1 148/3 148/3 148/6 149/1</p> <p>rolling [1] 130/16</p> <p>rollout [1] 130/2</p> <p>room [2] 103/14 124/14</p> <p>rotated [1] 166/23</p> <p>roughly [1] 61/24</p> <p>round [1] 158/3</p> <p>route [7] 92/6 92/16</p> <p>Royal [76] 127/23 128/2 128/2 128/11 128/14 128/15 128/16 128/18 129/1 129/12 129/13 131/19 132/1 132/6 137/2 137/13 137/17 139/3 139/19 142/15 142/21 143/15 143/20 148/12 148/15</p>	<p>148/19 148/24 149/2 149/15 149/20 149/21 149/21 152/3 152/17 153/24 155/12 156/8 156/20 156/24 157/24 158/11 158/12 159/11 159/15 160/4 160/8 160/18 160/25 162/22 164/3 166/5 166/24 168/4 168/8 168/10 168/13 168/16 168/20 168/20 169/13 169/24 170/4 170/9 170/15 171/9 171/19 171/22 171/25 172/25 173/14 173/17 173/19 174/11 174/13 174/14 174/15</p> <p>Royal Mail's [1] 132/6</p> <p>ruled [1] 21/5</p> <p>rules [1] 6/3</p> <p>ruling [1] 21/7</p> <p>rumours [1] 16/7</p> <p>run [11] 55/10 60/7 112/3 112/8 124/17 132/22 133/2 141/6 141/11 143/16 162/13</p> <p>run-up [2] 112/3 112/8</p> <p>running [5] 6/23 16/17 141/23 151/25 165/2</p> <p>rural [1] 138/13</p> <p>rush [2] 151/7 151/8</p> <p>S</p> <p>saddled [1] 132/9</p> <p>safe [1] 51/4</p> <p>said [55] 14/24 25/25 27/20 29/15 30/6 31/6 34/9 36/6 36/21 49/14 50/22 52/20 54/17 56/13 60/7 63/12 65/15 70/8 73/10 78/23 79/16 81/19 99/7 109/17 110/22 112/20 113/1 113/5 113/12 116/12 117/2 117/2 117/18 117/21 118/6 118/15 120/25 121/1 121/7 121/19 122/15 124/2 124/23 125/7 125/8 129/1 137/19 145/11 150/2 152/25 158/12 165/14 167/9 174/3 174/5</p> <p>sales [2] 136/17 136/17</p> <p>same [21] 31/18 39/19 47/17 62/14 77/11 93/21 94/12 97/20 107/22 137/1 141/22 142/15 149/25 150/5 150/6 156/9</p>	<p>157/17 158/14 158/14 174/19 175/24</p> <p>sample [2] 65/25 83/5</p> <p>Sarah [1] 92/5</p> <p>sat [4] 17/1 157/24 158/12 163/18</p> <p>satisfy [1] 165/16</p> <p>save [1] 111/15</p> <p>saving [3] 95/17 95/23 96/2</p> <p>saw [5] 55/5 60/1 66/25 94/12 118/20</p> <p>say [123] 2/21 5/9 6/19 7/2 7/18 8/6 8/14 10/22 11/13 11/15 13/8 14/17 19/19 20/10 20/25 21/3 22/14 22/24 23/12 24/2 24/17 27/4 28/6 28/10 28/14 29/20 30/17 31/3 32/14 33/18 33/25 34/25 35/17 36/10 37/16 40/8 41/8 41/17 41/17 42/18 43/4 43/25 44/25 45/20 46/13 47/24 48/9 50/20 55/9 56/4 58/2 58/8 61/4 62/25 64/17 64/24 67/19 70/14 73/17 73/19 78/13 78/22 81/18 82/11 83/1 85/11 86/16 88/23 89/17 89/18 91/16 92/17 98/3 98/12 99/8 110/21 112/5 113/7 113/15 118/1 119/14 119/15 119/24 119/25 122/22 123/22 124/9 127/17 127/21 128/10 130/13 130/22 132/3 136/7 139/23 139/23 139/25 140/10 141/5 141/15 143/15 145/1 145/25 146/23 147/12 149/25 153/14 158/25 159/23 161/11 162/21 163/15 164/19 166/4 166/12 168/6 168/22 168/24 169/14 171/18 171/23 172/23 173/25</p> <p>saying [32] 5/21 7/20 9/2 21/10 25/21 29/13 29/14 33/15 34/18 35/7 36/5 45/24 46/9 49/22 49/25 58/23 59/1 65/2 65/10 75/20 95/22 96/24 102/1 102/14 108/7 112/7 113/10 113/11 121/3 121/5 123/24 146/1</p> <p>says [82] 6/11 16/15 18/13 19/7 21/23</p>	<p>26/24 26/24 31/19 31/24 33/7 33/18 38/4 38/24 38/25 39/10 39/18 40/9 44/22 45/4 47/23 48/4 48/15 48/18 48/24 49/6 50/18 50/24 51/13 54/5 54/7 55/18 57/6 57/14 59/22 61/20 71/2 71/3 72/16 72/22 72/22 72/23 74/13 74/17 76/25 77/8 77/13 80/11 81/12 81/14 84/12 85/3 85/15 85/22 87/1 87/14 89/21 90/2 91/24 92/4 92/12 94/14 95/13 97/8 100/5 100/14 104/1 105/3 110/7 121/24 123/6 127/3 129/5 133/15 146/7 147/5 147/9 147/12 160/11 167/25 168/16 175/5 175/11</p> <p>scale [3] 129/15 138/3 170/12</p> <p>scan [1] 38/7</p> <p>scandal [1] 163/4</p> <p>scanned [1] 83/3</p> <p>schedule [12] 14/1 14/2 19/23 53/25 54/18 54/25 55/5 55/6 55/23 63/6 111/12 111/17</p> <p>schedules [2] 13/18 110/23</p> <p>scheme [1] 38/19</p> <p>schools [1] 12/19</p> <p>scope [2] 131/3 131/6</p> <p>Scotland [1] 85/17</p> <p>Scott [3] 93/7 93/12 94/13</p> <p>Scottish [1] 149/8</p> <p>screen [6] 2/8 5/5 45/7 45/8 45/19 116/11</p> <p>scroll [59] 2/11 3/14 3/16 5/25 6/9 14/8 17/19 18/2 18/10 20/8 21/9 21/18 21/19 21/22 33/24 38/16 42/12 42/14 44/15 46/11 47/22 50/17 54/3 54/7 55/8 56/12 59/11 59/19 60/14 61/7 61/9 61/11 61/13 66/9 67/14 67/24 68/4 68/9 69/14 71/16 72/12 74/17 75/19 76/21 76/23 85/15 85/21 95/12 97/6 99/23 100/11 104/22</p>	<p>106/14 106/16 107/2 107/4 107/14 108/14 108/19</p> <p>scrolling [1] 95/20</p> <p>scrub [1] 10/15</p> <p>search [1] 51/6</p> <p>seat [1] 126/15</p> <p>seated [1] 125/19</p> <p>second [12] 42/12 42/13 44/21 59/1 59/12 68/15 73/6 73/7 73/8 106/25 123/23 138/10</p> <p>secondly [1] 132/11</p> <p>Secretary [9] 143/1 163/23 164/1 164/2 167/9 173/12 173/16 173/23 174/1</p> <p>section [4] 28/8 74/1 74/2 122/1</p> <p>section 1 [2] 28/8 122/1</p> <p>Section 8 [1] 74/2</p> <p>Sector [1] 70/25</p> <p>secure [1] 111/8</p> <p>security [24] 4/11 12/14 18/7 38/17 84/10 85/25 86/2 86/6 93/13 100/21 110/16 145/13 163/16 163/17 163/18 164/9 164/12 165/20 167/25 168/1 169/17 170/5 171/15 173/11</p> <p>Security/Legal [1] 163/16</p> <p>see [98] 1/3 2/14 2/25 3/10 3/18 5/11 6/1 13/25 14/14 15/20 16/12 17/12 17/20 18/2 18/10 20/8 20/14 21/18 21/20 26/23 34/17 35/25 37/20 37/23 38/1 40/2 41/11 42/12 47/14 48/5 48/21 49/11 49/22 53/19 54/3 54/5 56/10 59/12 61/7 61/11 64/2 67/13 68/2 68/13 69/15 70/22 71/3 71/16 71/18 72/14 75/11 76/23 82/19 82/20 83/16 83/24 86/24 87/10 88/2 89/1 90/21 91/3 93/4 95/12 97/6 99/19 103/7 106/1 106/14 107/7 107/25 108/15 113/9 116/22 119/18 120/2 125/24 128/10 129/2 134/1 135/20 137/20 143/8 146/10 148/12 150/16 152/17 153/21 153/22 154/1 157/8</p>
--	---	---	---	--

S	63/7 64/12 67/11 67/17 67/17 82/25 83/23 84/7 84/12 86/20 87/19 99/25 100/1	38/3 38/4 48/18 48/24 51/13 64/19 64/20 75/16 75/22 76/24 76/25 77/13 78/12 78/14 79/16 79/17 80/11 80/16 83/6 86/4 86/5 91/23 92/4 92/10 100/2 100/5 101/11 102/15 117/1 117/4 121/14 121/19 124/17	162/16 162/17 162/23 166/3 shouldn't [11] 56/24 67/21 70/20 74/24 119/2 119/5 123/16 123/16 123/17 161/21 162/25 show [5] 27/11 28/15 36/9 43/16 121/10 showed [2] 22/18 41/16 showing [1] 64/22 shown [2] 171/3 172/7 shows [2] 3/20 43/7 shred [1] 111/9 side [9] 83/20 91/11 91/17 91/18 99/14 99/15 136/11 156/5 168/8 sides [1] 24/4 sign [2] 21/18 33/19 sign-off [1] 21/18 signature [6] 1/21 54/3 54/4 54/5 126/24 127/7 signed [5] 61/12 63/3 116/22 142/23 142/25 significance [1] 90/4 significant [8] 12/23 12/25 51/20 69/4 89/8 100/15 114/23 175/11 significantly [1] 146/11 similar [6] 17/6 17/18 34/22 77/2 99/16 171/14 simple [1] 86/15 simply [4] 9/4 35/13 55/23 74/24 since [8] 27/9 32/5 38/9 39/3 39/7 39/11 114/5 176/23 Singh [43] 20/10 22/1 23/13 31/19 35/3 56/4 59/6 59/10 61/10 61/18 70/24 72/15 73/21 73/23 74/6 74/8 75/9 75/19 75/25 76/11 76/19 78/8 80/11 88/9 90/13 90/23 104/23 106/11 106/15 106/18 106/19 108/14 108/24 109/4 109/9 112/20 118/10 123/5 123/6 123/17 123/24 124/5 124/8 Singh's [1] 35/16 single [2] 88/13 176/4 sir [29] 1/3 53/10 53/19 96/12 102/24 103/3 103/7 103/9 110/13 118/6 125/10	125/17 125/22 125/24 126/11 136/23 150/7 150/10 150/12 151/6 151/13 153/15 171/17 172/16 172/22 176/11 176/16 177/3 177/6 Sir Michael [2] 136/23 153/15 Sir Wyn [1] 125/22 sit [9] 57/16 80/22 96/18 148/19 157/2 163/24 167/4 175/16 175/21 sits [1] 176/4 sitting [1] 93/12 situation [2] 2/22 66/17 six [7] 39/12 59/23 59/25 60/13 60/15 60/24 148/7 size [4] 56/14 129/15 135/12 138/11 sizes [1] 148/2 slightly [8] 2/11 18/10 21/22 44/11 132/22 142/5 145/20 145/20 SLT [1] 87/2 small [4] 24/2 57/11 59/2 126/25 smaller [6] 24/11 36/22 36/23 37/2 57/25 65/24 Smith [6] 19/8 19/10 19/14 19/19 26/10 89/24 Smith's [1] 89/22 so [212] social [2] 131/24 138/16 sold [1] 132/20 solely [1] 168/13 solicitor [10] 13/20 20/14 24/9 24/21 25/22 35/1 65/24 75/12 96/8 107/6 solicitors [9] 75/9 84/19 93/11 93/16 95/11 96/6 98/20 99/7 99/11 solution [1] 131/22 solve [1] 135/24 solvency [6] 135/19 135/22 136/6 136/8 136/13 143/4 solvent [3] 135/9 135/10 135/10 some [80] 6/23 11/24 12/22 17/24 28/3 31/5 31/5 34/24 38/10 45/22 49/24 50/12 50/16 51/15 52/2 55/24 58/24 58/24 58/25 61/21 64/25
----------	---	---	---	--

S				
some... [59] 65/1 65/8 65/18 66/9 69/8 69/20 70/5 72/4 74/3 75/1 79/9 79/17 80/4 80/13 80/25 82/12 82/24 83/10 83/24 83/25 90/19 92/24 93/11 93/14 93/24 95/9 98/12 98/14 100/23 101/5 101/14 101/20 102/25 103/9 104/9 107/8 114/11 118/21 121/18 124/22 126/9 127/15 129/20 131/19 131/22 132/18 135/16 140/12 145/7 148/3 148/3 152/15 153/12 153/22 157/17 165/10 166/18 175/15 176/9	169/10 172/16 172/18 173/15 173/24 176/17 sort [22] 14/11 19/1 38/22 38/22 41/9 41/10 52/3 80/4 83/11 88/21 89/15 101/8 129/17 130/4 133/3 134/19 134/21 156/15 161/4 163/16 165/10 172/8 sought [1] 106/10 speak [10] 11/7 17/5 17/12 24/19 29/19 112/10 121/3 125/21 151/20 172/19 Specialist [1] 14/23 specific [9] 6/3 12/18 50/6 52/5 81/6 84/3 87/12 159/1 167/7 specifically [1] 24/1 specificity [1] 51/24 specifics [1] 7/10 spend [6] 93/25 95/10 146/15 148/8 148/18 148/24 spent [6] 11/23 62/19 130/5 148/14 148/24 149/14 SPMs [1] 119/11 spoke [5] 19/19 24/10 92/20 113/2 113/9 spoken [3] 10/2 31/20 50/22 spotlight [1] 84/20 spreadsheets [1] 40/20 spring [1] 26/3 Springford [1] 99/24 Square [17] 14/22 15/5 15/9 15/13 15/15 16/10 26/5 42/21 52/11 66/19 72/20 77/25 78/25 79/3 80/2 82/21 104/4 staff [3] 46/15 51/8 157/22 stage [32] 17/24 18/21 19/16 20/18 25/1 30/10 30/12 38/18 43/1 55/12 56/15 60/9 60/16 62/9 63/16 64/20 65/12 66/5 85/18 91/11 91/14 102/8 129/16 129/18 131/19 133/9 133/10 133/23 135/16 143/3 143/5 169/2 stages [3] 2/17 2/24 173/25 stakeholders [1] 86/8 stand [1] 10/14 standard [1] 88/13	standards [1] 141/1 stands [1] 127/13 start [20] 4/3 5/7 14/7 14/8 51/15 55/7 59/18 84/5 84/7 126/20 133/7 135/10 135/19 141/15 143/19 143/21 166/18 166/19 167/25 173/15 started [13] 4/7 19/22 37/8 50/8 52/2 52/8 52/19 92/8 110/23 141/17 143/9 143/19 150/7 starting [1] 177/4 state [4] 86/8 115/8 126/16 143/1 stated [1] 114/8 statement [97] 1/14 1/23 3/6 3/25 5/5 5/6 5/8 5/16 7/1 8/5 8/25 10/13 10/21 11/2 11/16 13/7 13/17 15/8 15/17 15/19 30/7 33/14 33/22 37/22 40/24 41/18 41/24 42/4 42/5 42/9 42/11 42/16 43/18 43/25 44/8 44/16 46/24 52/20 55/10 55/12 55/18 59/20 60/7 60/9 60/15 68/12 68/13 69/8 69/12 71/1 72/24 73/9 73/12 74/2 78/15 78/25 79/3 80/14 80/17 80/20 80/22 80/24 81/4 81/7 81/21 82/7 82/14 82/19 82/21 97/17 104/3 104/6 105/5 105/18 105/22 112/2 112/11 112/13 114/9 116/10 116/22 119/4 119/15 125/13 126/18 126/20 127/6 127/10 127/14 132/4 145/11 146/21 147/25 158/24 168/5 168/21 172/13 statements [2] 101/25 115/2 statutory [1] 156/18 Staughton [1] 2/20 stay [1] 103/14 stayed [1] 25/7 staying [1] 25/11 steam [2] 94/19 94/23 steer [2] 52/3 97/18 Stein [4] 103/12 120/19 120/20 178/10 step [2] 161/11 175/6 steps [3] 106/5 109/5 154/16 STEVENS [4] 126/14	151/17 177/5 178/14 sticking [1] 23/22 still [14] 10/14 30/10 36/17 43/1 60/24 68/2 84/19 95/7 122/9 148/6 150/5 150/5 150/6 161/16 stock [2] 51/4 51/4 stolen [4] 27/7 28/15 48/10 51/19 stood [1] 147/8 stop [1] 151/15 stopped [1] 147/15 stopping [1] 24/5 straight [2] 63/14 120/22 straightforward [2] 45/15 171/24 strait [1] 135/11 Strand [2] 85/16 86/5 strands [1] 86/6 strange [1] 130/20 stream [1] 40/17 strengthen [1] 39/25 stress [1] 75/3 strike [1] 116/21 stripping [1] 97/4 strong [2] 28/2 28/11 structure [4] 157/12 157/13 158/19 161/25 structures [10] 139/5 139/14 139/18 140/1 158/8 163/3 165/8 165/14 165/16 166/2 Stuart [1] 131/4 studied [1] 169/4 stuff [2] 13/21 98/6 style [1] 82/17 sub [1] 62/16 subcommittees [3] 139/20 168/25 169/1 subject [5] 7/25 15/1 59/20 64/3 127/9 submitted [3] 18/15 60/16 66/8 submitting [1] 44/16 subpostmaster [9] 2/16 2/22 47/1 47/4 52/1 52/7 56/10 160/4 164/18 subpostmasters [17] 31/6 66/13 94/16 97/12 98/20 119/23 127/20 138/23 138/24 144/6 159/10 159/14 160/19 163/7 163/14 168/24 169/7 subpostmistresses [1] 127/20 subsequent [3] 62/19 132/3 159/7 subsidiary [5] 133/4 133/7 137/5 157/10 158/20	subsidised [1] 132/24 substantial [1] 14/15 substantive [2] 1/19 44/22 subtle [2] 141/20 141/24 success [1] 88/9 successful [2] 102/17 129/8 such [9] 23/9 38/7 38/12 39/22 46/21 46/22 47/2 58/6 105/10 Sue [5] 27/23 85/24 86/3 86/4 86/4 sufficient [6] 5/16 5/22 27/5 50/2 95/4 96/15 suggest [8] 24/19 27/16 31/14 48/7 66/15 105/14 118/9 119/21 suggested [10] 22/12 35/15 60/16 77/10 102/18 107/21 107/24 108/25 125/2 149/25 suggesting [3] 23/16 45/9 122/19 suggestion [2] 30/12 88/13 suggestive [2] 31/1 31/14 suggests [1] 80/4 suit [1] 151/20 suitable [1] 126/9 summarise [2] 131/15 153/25 summarised [3] 114/22 114/23 115/1 summarises [1] 31/23 summary [3] 30/16 86/7 153/22 summer [4] 40/5 42/20 42/22 84/6 supply [2] 72/8 74/4 support [4] 77/15 87/12 97/17 100/24 supported [3] 46/4 101/25 135/13 supporting [1] 90/7 supportive [2] 45/22 90/5 suppose [5] 25/20 45/24 58/19 89/16 122/9 supposed [1] 136/19 sure [27] 9/22 10/10 13/4 24/21 29/21 40/22 50/11 58/4 76/20 88/21 105/19 106/12 111/8 112/18

S
sure... [13] 115/3
 139/4 139/4 139/14
 150/11 152/9 156/10
 156/11 156/15 157/25
 163/25 167/12 171/17
surely [1] 113/16
surprise [3] 58/14
 58/20 129/4
surprised [5] 57/4
 58/21 58/22 58/23
 92/5
Surprisingly [1] 71/9
surrounding [2]
 19/12 26/11
survive [1] 138/6
suspect [1] 44/5
suspected [2] 161/2
 163/13
suspects [3] 22/19
 23/1 23/5
suspicion [1] 130/23
sustained [1] 23/10
Sweetman [1] 131/4
swept [1] 118/13
sworn [5] 1/9 126/2
 126/13 178/2 178/12
system [85] 2/17 7/4
 7/12 7/19 12/12 14/5
 14/25 16/2 16/6 17/7
 28/20 31/2 31/8 31/12
 34/2 37/5 37/10 38/9
 43/7 44/20 45/6 45/11
 45/21 45/23 46/1 46/5
 46/15 46/20 47/1 47/2
 47/5 48/22 49/2 50/1
 50/3 50/10 62/14
 66/12 66/14 68/16
 68/24 69/4 69/6 71/8
 72/22 75/15 75/23
 76/3 76/24 77/6 77/8
 77/9 77/11 77/23 78/3
 89/6 102/9 104/5
 104/18 107/9 107/20
 107/21 107/22 107/25
 108/1 108/9 108/23
 109/6 109/19 109/22
 110/1 115/5 115/24
 116/14 116/18 117/19
 117/22 117/22 118/1
 118/7 121/15 124/21
 136/1 163/8 163/10
systemic [1] 165/11
systems [3] 14/22
 39/15 119/18

T
t'other [1] 158/2
tactical [1] 36/8
take [44] 5/1 24/13
 33/14 35/7 40/23 41/9
 44/21 46/5 48/16 49/9
 49/10 50/14 53/11

56/23 57/3 59/5 59/23
 59/25 60/24 61/21
 64/2 65/19 66/9 67/25
 76/15 80/20 93/20
 96/13 99/22 117/14
 120/22 126/15 126/24
 132/21 136/2 140/6
 148/25 150/3 150/8
 154/16 167/12 169/12
 173/25 176/12
taken [18] 29/16
 32/20 36/8 48/2 54/23
 57/22 59/16 60/13
 67/1 72/4 74/24 75/13
 99/16 101/21 107/3
 131/12 133/16 136/13
takeover [1] 128/4
takes [2] 76/13 155/2
taking [3] 82/9
 140/19 145/7
Talbot [3] 21/10
 21/15 23/12
talk [6] 17/11 23/19
 144/6 144/22 148/20
 172/13
talked [1] 49/2
talking [8] 8/15 16/20
 37/9 60/4 91/9 146/3
 171/8 175/8
task [2] 69/12 95/5
tasked [2] 92/13
 100/21
Tatford [14] 72/15
 75/20 76/11 76/12
 78/22 90/14 90/24
 91/9 104/10 106/11
 106/19 109/4 109/10
 112/5
Tatford's [2] 73/3
 73/19
Taylor [4] 60/14
 61/10 61/12 64/16
team [54] 4/11 4/20
 12/14 13/10 13/19
 18/8 18/24 19/11
 21/20 38/18 38/22
 50/19 73/16 76/18
 84/10 85/12 85/13
 85/24 86/1 86/3 86/12
 87/3 87/11 87/17
 87/23 90/3 90/16
 91/12 108/22 109/18
 110/21 111/20 119/2
 119/21 122/4 129/7
 129/21 139/17 145/6
 151/3 157/21 163/12
 163/17 163/18 163/24
 163/24 164/9 164/12
 164/20 165/18 165/19
 165/20 165/20 166/6
Team's [1] 26/10
teams [6] 18/15
 18/21 68/18 90/6
 163/22 165/21

tech [1] 130/19
technical [1] 114/23
telephoned [3] 14/19
 33/17 78/23
tell [8] 28/24 44/12
 51/12 51/14 60/14
 72/10 81/12 119/9
telling [2] 91/19
 117/3
ten [1] 96/14
tend [1] 66/15
tended [1] 17/14
tendered [1] 62/20
tends [1] 175/16
tenure [2] 61/23
 127/23
terminal [1] 43/21
terms [20] 13/24
 22/19 33/10 35/10
 42/20 57/10 64/13
 86/15 94/10 119/13
 137/15 138/9 146/8
 146/12 146/15 152/10
 153/14 153/25 154/1
 166/10
terrible [1] 127/18
test [4] 5/10 5/13
 5/20 89/16
tested [4] 30/1 30/21
 38/14 169/17
testing [2] 77/10
 107/22
tests [1] 8/21
than [25] 14/15 18/22
 30/9 45/6 76/13 77/16
 79/1 84/1 90/23 96/8
 97/2 112/6 116/14
 120/12 133/4 137/11
 141/13 142/5 148/13
 148/15 149/14 151/7
 160/19 171/9 176/12
thank [76] 1/4 1/5
 1/13 2/7 2/8 2/11 2/21
 3/5 3/22 3/25 4/16 5/5
 14/4 14/17 15/5 21/25
 38/24 42/19 44/10
 53/15 53/20 53/21
 61/8 93/20 96/21
 99/22 101/16 102/24
 103/3 103/8 103/17
 103/25 104/14 104/21
 104/22 105/2 106/25
 107/14 107/15 108/7
 108/12 108/13 108/20
 110/8 110/10 110/13
 111/18 120/17 120/18
 120/23 120/24 123/3
 125/9 125/10 125/12
 125/16 125/17 125/22
 125/25 126/1 126/11
 126/12 126/18 127/5
 127/13 131/2 150/17
 151/13 151/21 166/21
 166/23 167/24 170/4

172/22 177/8 177/9
thanks [2] 89/22
 129/7
that [1117]
that I [5] 8/9 72/19
 79/15 91/20 150/4
that's [130] 1/19 2/11
 3/8 3/14 3/24 4/10
 4/12 4/22 6/1 7/6 9/2
 16/18 16/20 17/4
 17/21 18/8 19/9 19/23
 20/2 20/2 26/9 26/16
 26/19 28/10 28/13
 28/21 29/23 32/20
 33/21 35/18 36/15
 38/2 38/6 38/11 39/12
 39/22 42/11 43/17
 43/23 44/3 45/2 47/15
 47/16 50/14 53/6 53/6
 55/5 55/13 55/14
 55/18 56/2 58/25 59/4
 59/14 60/12 65/1
 66/18 68/2 68/5 68/9
 68/12 74/23 75/13
 80/2 81/9 81/18 82/7
 82/8 87/2 89/24 90/14
 92/14 92/15 95/6 96/9
 96/10 101/10 101/10
 104/21 109/3 110/8
 111/16 113/7 113/14
 116/21 118/8 121/21
 122/14 124/25 127/2
 128/6 128/19 128/21
 128/24 135/17 135/17
 136/22 140/1 140/9
 144/13 149/5 149/8
 151/12 153/19 154/10
 156/15 156/18 158/7
 159/21 160/14 161/6
 161/22 161/23 162/4
 162/24 165/9 166/13
 167/10 168/10 171/12
 172/1 173/2 174/1
 174/3 174/17 175/11
 175/19 176/7 176/22
 177/6
theft [16] 22/3 22/7
 22/9 24/18 25/7 25/11
 25/11 66/14 67/1
 115/15 117/1 159/10
 160/19 160/22 163/13
 171/4
thefts [1] 46/21
their [11] 34/20 63/12
 76/18 78/24 80/21
 99/11 124/14 134/17
 138/6 174/14 176/20
them [37] 13/18
 13/19 21/4 23/17
 23/25 27/18 30/23
 32/1 37/3 39/21 43/14
 47/11 51/23 52/24
 63/15 67/25 76/14
 77/12 83/23 83/23

90/17 93/14 93/19
 95/7 96/2 98/10
 107/23 110/6 110/20
 117/4 120/15 130/14
 142/24 144/22 148/3
 148/3 161/3
theme [1] 99/2
themselves [2] 71/12
 161/2
then [108] 4/9 7/13
 8/3 9/5 9/15 10/8
 11/25 13/19 16/19
 20/13 22/9 24/9 24/15
 24/17 28/6 28/8 31/23
 31/24 33/1 33/7 35/9
 43/11 44/25 45/3 46/2
 46/16 46/21 46/23
 47/7 48/14 49/8 49/20
 51/10 55/11 57/16
 57/17 58/18 60/8
 63/13 64/1 67/17
 68/14 69/5 70/8 70/10
 71/19 72/4 74/17 75/8
 77/12 78/12 78/14
 80/9 82/19 87/14
 91/15 92/4 97/6 97/14
 102/5 103/12 103/12
 103/13 104/14 105/8
 106/15 106/25 107/14
 107/23 107/24 111/15
 120/3 121/9 121/14
 122/1 126/7 126/8
 128/20 131/25 132/20
 132/21 133/8 138/18
 139/4 141/16 143/10
 143/16 148/11 149/12
 153/12 154/6 154/9
 156/4 156/8 156/24
 157/18 158/14 159/20
 159/22 161/2 161/20
 165/11 165/12 165/15
 167/14 169/12 172/11
 175/9
there [263]
there'd [5] 17/10
 131/20 143/14 149/4
 170/22
there's [46] 21/9
 29/23 31/4 31/10 37/5
 48/14 48/19 48/20
 52/4 65/2 65/10 68/4
 68/11 79/14 82/7 84/9
 87/14 92/18 94/7
 95/20 96/24 98/11
 121/9 124/2 126/25
 137/25 138/1 139/6
 139/10 140/15 141/20
 141/22 141/22 153/10
 154/8 154/9 154/18
 155/8 157/17 162/10
 165/9 165/10 165/22
 165/22 169/5 175/20
thereafter [1] 109/20
therefore [11] 32/17

T	5/23 7/7 8/18 9/7 10/18 31/7 55/19 59/17 60/10 74/5 101/4 129/23 134/21 136/15 136/16 138/20 139/1 139/5 139/6 141/21 142/20 145/5 149/23 156/5 156/7 159/18 160/22 165/5 166/16 175/10	174/5 thoughts [2] 82/5 92/20 thousands [7] 62/18 95/24 96/2 96/10 130/8 130/9 130/9 three [16] 24/8 48/19 59/12 60/18 65/18 71/24 72/2 90/14 90/23 115/12 134/21 138/20 138/20 142/20 175/4 175/4 three years [4] 65/18 71/24 72/2 115/12 threshold [2] 32/17 33/4 through [22] 6/19 12/8 12/8 13/22 29/2 30/4 33/2 35/12 37/12 44/21 67/25 68/1 78/11 111/25 114/11 128/16 134/15 152/12 154/6 154/18 170/11 173/22 throughout [3] 26/25 62/15 102/21 tie [1] 41/21 ties [1] 18/14 time [129] 5/3 6/12 6/22 7/2 7/11 8/22 9/12 11/24 13/11 17/1 17/5 17/15 17/19 18/2 18/23 34/1 34/16 34/22 34/24 34/25 36/16 36/18 36/22 37/13 40/4 43/4 46/4 50/7 51/15 51/21 55/22 56/1 56/9 57/2 58/3 62/21 63/8 65/19 72/5 72/11 74/10 74/24 77/17 78/5 78/20 79/19 82/6 84/21 85/8 88/1 88/6 88/18 89/5 89/13 89/18 90/8 91/5 93/2 93/21 94/1 94/21 95/4 95/10 96/15 105/1 106/9 110/4 114/4 116/20 116/22 118/21 120/7 122/16 124/16 124/16 124/20 126/9 129/17 129/24 130/5 132/7 132/16 134/2 135/4 135/7 135/20 139/7 139/22 139/22 142/20 145/18 148/1 148/5 148/6 148/7 148/10 148/13 148/15 148/16 148/18 148/24 149/1 149/10 149/11 149/14 149/14 149/20 149/25 150/2 150/4 150/11 150/19 150/21 151/14 151/17 159/13	121/10 traditionally [1] 76/13 tragedy [1] 162/24 tragically [1] 140/4 trained [1] 129/19 training [21] 10/20 11/15 11/17 11/18 11/20 12/11 12/19 12/21 12/22 13/1 13/2 45/1 94/1 94/18 96/5 98/4 101/5 101/6 119/25 120/6 129/9 transaction [36] 23/17 23/23 24/7 24/12 28/17 30/1 36/12 36/13 36/17 37/7 38/8 39/20 49/3 50/8 52/5 52/25 59/13 59/17 65/17 69/15 70/1 70/5 71/5 71/13 71/21 71/24 71/25 74/11 98/25 105/10 105/12 105/25 117/15 118/14 118/16 119/16 transactional [1] 35/24 transactions [18] 24/1 27/16 37/11 39/14 39/19 39/22 40/11 42/5 43/18 50/7 51/20 68/5 71/6 71/9 74/16 105/6 105/23 106/4 transcriber [1] 150/8 transcript [1] 47/22 transcripts [1] 92/3 transfer [1] 44/24 transferred [2] 4/17 4/19 Transformation [2] 4/20 4/25 translated [1] 99/2 travelled [1] 80/21 treat [1] 41/1 treated [1] 10/7 trends [1] 86/9 trial [22] 10/18 21/5 21/8 37/22 41/22 65/7 65/14 66/6 71/18 71/19 79/12 90/22 93/11 112/3 112/4 112/8 112/9 112/23 113/21 113/23 114/16 119/5 tried [5] 51/6 56/9 65/16 81/11 126/4 trigger [2] 41/10 50/2 trouble [3] 84/18 85/6 85/10 true [2] 1/23 127/10 truth [1] 119/10 try [12] 9/15 44/12 75/6 93/10 95/9
therefore... [10] 33/16 36/2 40/22 66/21 98/23 99/5 135/18 139/16 148/14 173/11 these [40] 23/8 37/17 41/16 44/10 51/24 52/4 52/23 53/5 57/8 60/1 64/8 72/24 77/15 83/22 88/2 90/4 91/8 91/10 93/16 93/19 93/22 97/12 102/3 105/12 113/10 116/7 124/16 128/25 130/17 139/1 139/5 146/25 147/1 148/1 165/1 165/11 165/24 168/7 175/10 176/4 they [81] 5/1 5/18 5/19 5/20 5/21 7/22 10/1 18/9 18/25 21/3 22/2 23/1 23/23 24/1 28/25 29/1 34/20 37/12 39/25 44/11 47/1 47/9 47/9 49/11 51/20 56/6 63/12 65/24 68/22 72/20 75/1 77/15 80/5 80/5 84/18 90/25 91/14 93/15 93/16 93/18 93/24 94/17 95/6 98/2 98/7 98/22 99/12 101/7 101/7 102/4 102/8 103/10 114/22 119/17 122/19 127/12 129/18 130/15 138/14 139/11 139/12 139/25 145/23 147/3 148/2 154/13 154/14 155/3 157/16 157/22 157/25 158/1 158/2 158/4 158/5 158/7 159/25 161/1 163/22 163/22 176/20 they'd [3] 74/1 94/24 102/8 they'll [1] 65/11 they're [8] 3/6 5/4 52/4 67/6 74/5 148/2 157/6 175/8 they've [3] 31/6 52/17 102/14 thing [25] 48/6 49/12 111/5 119/6 127/18 132/5 132/11 134/12 135/19 138/3 138/8 138/10 139/1 139/23 142/2 143/2 148/4 152/15 153/20 157/11 157/17 158/5 165/25 166/14 175/19 things [32] 5/18 5/19	think [232] thinking [7] 7/14 26/1 34/16 43/9 120/6 124/19 132/2 thinks [2] 113/5 157/12 third [8] 59/13 66/5 75/17 107/8 127/2 138/18 162/10 162/12 third-party [1] 162/12 this [360] Thomas [19] 14/9 14/10 15/18 16/14 38/2 76/21 76/24 78/11 78/12 78/12 78/23 80/11 93/5 104/1 107/16 108/21 109/17 109/17 111/25 thorough [2] 70/8 119/14 those [61] 3/22 5/10 5/13 5/13 32/3 35/14 41/12 42/16 42/21 45/14 51/18 52/14 55/19 56/12 59/16 60/11 69/25 76/4 76/5 76/22 77/2 78/2 80/7 85/9 92/11 99/18 101/17 107/8 115/2 124/18 125/10 130/10 130/11 133/14 134/14 135/2 136/2 138/20 139/20 139/21 140/1 140/20 143/20 144/8 149/12 149/16 153/13 154/4 154/23 155/3 156/7 156/11 157/6 159/14 161/1 164/24 166/6 166/8 169/1 174/17 176/6 though [14] 19/9 25/24 30/10 35/25 36/16 41/24 43/5 59/21 74/9 80/3 80/25 81/24 89/3 95/15 thought [28] 8/3 9/8 9/11 15/13 20/13 21/16 22/11 37/7 37/11 52/1 76/2 83/15 85/10 93/18 114/20 114/25 115/1 122/16 124/6 132/19 145/19 156/1 157/1 171/23 171/25 172/19 172/20	thoughts [2] 82/5 92/20 thousands [7] 62/18 95/24 96/2 96/10 130/8 130/9 130/9 three [16] 24/8 48/19 59/12 60/18 65/18 71/24 72/2 90/14 90/23 115/12 134/21 138/20 138/20 142/20 175/4 175/4 three years [4] 65/18 71/24 72/2 115/12 threshold [2] 32/17 33/4 through [22] 6/19 12/8 12/8 13/22 29/2 30/4 33/2 35/12 37/12 44/21 67/25 68/1 78/11 111/25 114/11 128/16 134/15 152/12 154/6 154/18 170/11 173/22 throughout [3] 26/25 62/15 102/21 tie [1] 41/21 ties [1] 18/14 time [129] 5/3 6/12 6/22 7/2 7/11 8/22 9/12 11/24 13/11 17/1 17/5 17/15 17/19 18/2 18/23 34/1 34/16 34/22 34/24 34/25 36/16 36/18 36/22 37/13 40/4 43/4 46/4 50/7 51/15 51/21 55/22 56/1 56/9 57/2 58/3 62/21 63/8 65/19 72/5 72/11 74/10 74/24 77/17 78/5 78/20 79/19 82/6 84/21 85/8 88/1 88/6 88/18 89/5 89/13 89/18 90/8 91/5 93/2 93/21 94/1 94/21 95/4 95/10 96/15 105/1 106/9 110/4 114/4 116/20 116/22 118/21 120/7 122/16 124/16 124/16 124/20 126/9 129/17 129/24 130/5 132/7 132/16 134/2 135/4 135/7 135/20 139/7 139/22 139/22 142/20 145/18 148/1 148/5 148/6 148/7 148/10 148/13 148/15 148/16 148/18 148/24 149/1 149/10 149/11 149/14 149/14 149/20 149/25 150/2 150/4 150/11 150/19 150/21 151/14 151/17 159/13	159/22 160/25 161/7 162/1 165/1 165/13 167/6 167/6 168/15 173/7 175/5 176/5 176/13 times [3] 88/8 98/6 142/20 timing [3] 42/20 54/21 55/2 title [5] 6/13 6/16 18/8 18/10 93/5 today [19] 1/7 4/3 34/9 39/1 52/19 92/9 110/22 120/25 121/16 121/19 125/14 126/19 128/1 150/5 150/21 151/11 153/11 162/14 162/15 today's [1] 176/14 together [13] 19/23 69/10 70/11 78/2 83/24 93/22 110/23 111/17 118/10 118/19 154/10 154/23 165/24 toing [1] 64/7 told [13] 9/14 20/20 30/23 42/23 49/7 77/19 96/14 105/21 106/22 109/6 129/11 129/14 130/14 Tom [1] 16/16 Tom/Gareth [1] 16/16 tomorrow [5] 64/20 65/3 151/2 177/5 177/8 tone [1] 63/9 Tony [1] 164/6 too [6] 17/15 73/15 99/4 134/11 149/24 150/23 took [9] 47/20 48/9 55/15 59/8 72/8 72/10 74/10 133/3 135/20 tool [1] 38/12 top [11] 54/6 86/24 95/13 95/21 106/16 107/14 146/10 154/8 154/8 154/11 169/25 top-down [1] 154/11 topic [6] 11/15 14/4 84/2 106/25 112/15 116/9 topics [2] 144/8 151/15 total [3] 131/7 131/11 131/12 touch [1] 176/11 touched [1] 53/24 towards [1] 39/16 track [2] 47/17 101/8 trade [2] 18/12 134/8 trading [5] 27/11 83/3 83/14 83/22

T	undermine [2] 66/21 119/22	36/7 38/16 39/16 43/16 46/17 47/7 47/25 51/2 53/3 53/4 54/7 57/3 57/17 57/18 59/5 60/14 61/13 64/13 65/11 67/14 68/18 70/11 71/16 72/12 75/19 76/21 85/13 85/17 85/21 89/19 91/5 93/24 95/9 95/9 95/12 95/19 95/20 97/6 99/13 103/24 104/14 106/14 106/16 107/1 107/14 111/3 112/3 112/8 116/11 127/2 133/11 134/7 139/1 139/2 139/15 140/20 141/7 141/10 142/21 145/7 146/6 146/21 152/19 153/4 154/8 154/9 155/10 158/4 158/24 166/4 166/16 166/17 169/23 171/19	100/23 versa [1] 158/21 version [1] 93/10 very [56] 1/5 2/12 2/21 3/22 3/25 6/2 27/21 45/10 45/14 46/25 53/15 53/21 54/6 54/11 55/8 62/7 62/9 67/8 68/23 77/18 78/15 82/8 84/20 89/15 90/19 90/20 91/1 92/5 96/21 98/16 99/9 100/13 101/16 103/3 103/13 103/16 103/25 110/8 114/13 116/20 125/18 137/14 137/15 140/12 145/18 148/14 148/17 148/23 148/23 149/13 150/3 151/9 151/10 152/4 153/20 166/23 vice [1] 158/21 victim [3] 28/24 161/15 161/19 victims [1] 161/1 view [30] 11/1 27/5 28/2 33/8 35/6 51/25 55/22 63/12 63/16 64/3 68/18 73/17 73/18 76/9 77/14 78/2 82/1 88/18 92/15 92/19 117/23 123/24 130/7 132/10 141/12 141/17 154/8 154/9 154/11 161/18 views [2] 73/21 107/18 Viles [4] 87/3 87/4 87/5 88/5 visible [1] 149/3 visit [1] 80/15 visited [1] 3/9 voices [1] 82/13 volume [1] 100/15 vulnerable [1] 170/10	Warwick [5] 3/20 72/15 75/20 78/22 106/17 was [573] wasn't [59] 23/3 29/15 29/17 30/1 32/24 33/18 35/6 35/19 35/20 36/20 37/6 37/16 41/7 41/12 43/11 46/8 51/5 55/23 57/4 60/17 64/11 65/21 70/6 70/7 73/17 75/3 75/3 75/7 77/12 83/18 85/12 86/4 86/4 88/24 90/22 91/7 91/9 92/18 92/19 99/6 102/18 107/23 109/24 113/21 117/8 117/9 118/9 118/13 118/14 119/13 120/5 120/6 120/9 121/19 124/22 125/8 136/13 137/17 166/22 waste [1] 62/21 wasting [1] 77/16 watching [2] 89/14 90/24 waters [1] 58/13 Watford [1] 4/9 wave [1] 136/14 way [36] 31/10 40/11 45/18 45/22 63/20 65/3 83/24 118/2 120/7 130/20 135/24 136/8 136/18 136/21 140/21 141/6 141/8 141/10 141/10 141/23 143/17 148/17 153/9 153/22 154/7 155/9 156/1 158/3 158/3 159/12 162/15 162/22 165/10 165/25 171/21 177/2 ways [1] 114/23 we [314] we'd [2] 143/19 146/2 we'll [16] 6/8 7/10 13/23 20/1 23/20 30/21 44/12 54/23 59/15 70/22 84/17 85/5 103/13 103/15 128/10 140/5 we're [22] 1/5 8/12 14/7 37/9 37/19 39/7 42/20 65/3 69/22 75/10 77/18 78/20 82/10 83/1 84/5 88/6 93/3 96/22 103/11 125/18 177/4 177/6 we've [29] 10/2 10/25 26/4 30/13 33/23 34/4 40/3 41/4 52/11 52/11 52/12 59/14 63/5	
try... [7] 104/19 104/20 136/17 137/10 137/16 139/4 148/20 trying [25] 24/11 35/12 37/16 42/19 46/8 70/14 75/3 76/5 91/4 92/6 92/13 93/24 94/1 94/3 96/4 98/6 101/8 111/15 116/4 116/16 116/18 121/18 139/7 153/25 171/13 Tuesday [1] 80/15 turn [14] 1/18 27/3 37/23 47/21 94/6 95/2 106/25 127/6 129/3 131/1 133/14 134/7 167/23 170/3 turned [4] 57/5 58/3 58/5 98/5 twice [1] 88/21 two [32] 5/18 5/19 5/23 10/5 17/6 27/22 32/6 58/19 59/16 83/24 92/11 92/25 93/16 94/15 96/12 103/21 110/19 115/1 132/10 134/21 137/14 137/14 142/19 146/16 148/12 148/13 149/12 154/19 159/18 175/4 175/4 175/10 type [5] 27/16 62/19 96/9 134/23 174/19 typed [1] 92/15 types [1] 160/18 typical [1] 167/16 typographical [1] 126/25	undermined [1] 80/6 undermining [1] 117/12 underneath [2] 153/5 166/9 understand [17] 7/8 22/5 22/6 22/21 23/9 32/6 32/16 36/5 73/3 74/14 74/22 75/25 86/17 107/10 123/12 126/25 127/16 understanding [6] 20/11 36/15 68/16 73/8 153/6 167/10 understood [1] 54/17 undertake [1] 120/3 undertaken [4] 41/12 60/20 101/19 109/5 undertaking [1] 98/22 undertook [1] 11/16 underwrite [1] 62/12 unexpected [1] 52/18 unexplained [4] 53/9 116/7 119/11 120/5 unfiltered [1] 115/8 unfortunately [2] 39/24 151/2 union [1] 132/12 Unique [1] 1/17 unit [2] 51/4 133/5 units [1] 51/7 unjust [2] 117/10 118/4 unless [1] 8/1 unnecessary [1] 98/18 unparalleled [1] 88/11 unprofitable [2] 132/7 138/15 unrealistic [2] 51/23 176/22 unreliable [1] 130/24 unrest [1] 132/12 until [17] 2/18 4/13 4/20 15/9 23/18 38/13 39/17 65/13 74/10 96/19 102/22 128/5 131/12 132/16 149/22 176/21 177/11 untruthful [1] 45/9 unused [3] 14/3 53/25 54/1 unusual [2] 160/24 175/20 up [91] 2/7 2/11 6/23 8/16 10/4 18/10 20/8 21/9 21/18 21/19 21/22 24/13 25/21 29/12 30/3 30/5 33/17	up' [1] 86/13 update [1] 21/25 updated [1] 19/12 updating [1] 54/18 upon [4] 8/8 9/18 53/24 176/25 urgent [2] 75/22 100/20 urgently [1] 118/25 URN [1] 126/23 us [26] 4/23 11/17 21/13 28/10 29/20 49/7 49/10 53/10 53/19 61/14 70/4 71/9 73/2 79/5 80/15 80/16 81/13 83/9 90/14 92/2 93/8 95/23 95/23 121/4 123/12 140/18 use [4] 45/10 45/15 98/7 124/25 used [9] 45/14 45/24 46/1 46/10 78/11 87/15 101/25 116/18 124/12 useful [1] 93/19 using [3] 97/22 116/19 130/21 usual [4] 22/19 22/25 23/5 58/12	U UK [1] 70/25 UKGI00015099 [1] 50/14 ultimately [2] 29/1 38/3 Um [1] 7/9 unable [2] 27/12 121/11 unacceptable [1] 162/4 unaware [3] 6/20 79/2 160/11 unbelievable [1] 127/21 under [11] 11/6 32/11 35/4 118/13 121/8 121/23 123/10 123/13 125/6 131/7 133/15 undercover [1] 171/1 underlying [4] 61/1 62/23 86/9 105/8	V vague [1] 5/19 valuable [1] 95/17 valuation [1] 131/13 value [2] 63/11 132/8 varied [1] 148/2 variety [2] 121/4 125/14 various [5] 24/22 78/16 93/23 97/8	W waiting [1] 12/10 Walmart [1] 128/5 want [28] 5/8 33/14 43/24 44/8 45/20 46/11 60/8 66/1 84/7 99/9 100/13 103/21 114/11 116/11 122/19 126/2 126/19 136/22 138/16 148/23 149/13 151/8 151/22 152/21 158/23 166/18 176/9 176/23 wanted [9] 66/2 75/1 95/6 96/7 98/2 98/7 127/21 158/2 158/7 wants [1] 55/11 warranted [1] 129/20

W	167/2 167/9 167/21 168/14 168/15 168/25 173/2	where [75] 2/2 10/10 16/7 16/17 17/11 21/2 26/3 29/5 29/19 31/4 33/25 34/7 34/10 34/11 34/16 35/25 36/22 38/19 41/1 42/20 48/13 51/7 51/18 52/17 52/19 57/9 57/9 57/12 57/13 59/8 60/6 67/1 72/23 75/15 78/5 81/4 81/7 92/3 97/25 101/7 101/24 103/22 105/6 105/23 109/16 111/7 111/14 116/6 116/6 117/16 120/5 121/18 129/18 136/22 140/18 148/10 151/20 152/16 153/12 155/3 156/23 157/2 157/6 157/18 162/2 162/3 163/17 163/24 166/10 167/11 169/8 171/1 173/7 175/8 176/8	whichever [1] 75/7 while [6] 11/18 12/9 40/20 103/13 127/23 172/21 whilst [2] 128/1 149/2 who [59] 3/3 13/19 15/15 16/4 19/9 21/13 21/14 23/1 34/22 38/17 49/17 51/18 54/13 54/25 54/25 61/14 61/16 66/13 68/17 69/2 69/3 69/6 69/12 70/24 75/25 76/6 76/9 76/17 76/18 85/9 89/24 90/14 92/9 93/13 98/15 99/24 100/7 100/7 102/14 106/13 107/6 119/15 119/16 122/5 124/20 127/19 130/4 135/3 136/6 139/17 142/10 150/22 160/11 161/19 163/12 164/16 164/23 167/19 175/21 who'd [1] 129/21 who's [1] 63/3 whole [9] 11/11 37/10 142/24 148/16 154/22 155/11 165/13 175/3 175/4 whom [1] 142/7 Whose [1] 73/18 why [40] 4/23 25/6 25/10 25/12 27/13 28/3 28/23 29/5 29/20 41/18 45/20 47/6 48/12 62/2 62/8 64/14 70/4 70/6 71/12 72/8 72/10 78/1 82/5 83/20 86/15 88/23 92/10 121/3 121/12 122/4 122/6 122/14 123/12 155/25 165/4 173/13 173/13 173/19 174/17 175/12 wider [2] 35/15 58/1 wife [2] 48/21 49/10 will [55] 3/25 4/1 21/5 21/7 21/8 22/2 23/13 24/21 28/2 32/9 32/10 32/11 32/17 35/4 44/13 55/12 57/16 60/9 61/21 61/25 62/3 62/10 62/12 62/13 63/12 64/19 69/21 72/25 73/1 74/20 81/20 86/7 86/8 86/10 88/15 102/25 103/14 104/18 108/2 108/21 109/17 121/16 123/8 123/10 123/10 126/8 127/14 151/2 151/4 151/14 151/15 157/14	166/9 172/15 176/12 Williams [1] 177/7 willing [1] 98/22 Wilson [9] 22/1 93/7 94/8 94/13 112/20 112/25 149/7 170/5 170/7 win [1] 97/12 wish [9] 8/18 57/1 61/25 63/22 119/21 124/3 127/1 127/16 150/22 wished [1] 64/9 withdrawals [1] 39/23 withdrawn [2] 22/4 135/1 within [28] 17/25 23/4 27/25 39/14 40/5 41/23 43/6 70/12 73/11 84/4 87/22 89/14 95/8 98/4 100/1 101/2 105/16 105/24 107/15 109/21 133/5 137/6 156/11 159/11 163/18 164/13 164/19 164/21 without [4] 36/13 63/3 64/10 110/6 WITN04380100 [2] 126/24 146/22 WITN04670100 [3] 1/18 2/8 33/15 witness [52] 1/14 6/21 6/24 7/1 10/3 10/3 10/7 10/8 10/8 10/11 10/13 16/18 17/13 21/19 33/14 33/22 37/21 40/24 42/11 43/25 46/24 52/20 59/20 60/15 68/11 68/12 71/1 78/15 78/24 79/1 79/7 80/3 80/13 80/17 80/20 80/23 81/4 82/14 82/19 97/17 125/13 126/18 126/20 127/14 132/4 145/11 146/21 147/25 158/24 168/21 172/12 176/19 won't [1] 67/25 wonder [1] 95/18 word [1] 124/25 words [8] 11/8 42/13 42/16 117/19 117/22 121/8 127/17 144/10 work [35] 11/19 12/7 12/7 48/19 57/16 83/9 89/23 90/5 90/20 96/9 98/12 101/17 101/19 109/21 110/3 110/18 120/4 124/12 132/21 145/15 148/5 148/7 148/9 148/17 153/20
we've... [16] 68/12 70/5 71/17 77/24 84/21 88/7 101/23 104/17 114/11 116/9 135/6 138/8 140/3 155/17 167/14 175/1	well-known [1] 88/7 went [10] 10/17 13/5 29/2 29/9 36/19 72/3 75/8 109/16 130/11 134/15 were [215] weren't [12] 6/3 47/18 54/12 63/20 67/2 68/23 74/4 82/1 85/18 91/13 101/7 116/17 West [16] 3/9 7/14 7/16 8/23 15/1 15/10 17/8 41/9 50/20 59/20 64/20 71/5 87/16 91/25 105/11 106/1 West Byfleet [2] 3/9 7/14 what [195] what's [7] 2/12 82/4 92/15 150/19 154/11 162/4 176/3 whatever [4] 47/5 83/15 94/2 172/4 whatsoever [1] 63/4 when [106] 8/14 8/17 10/1 18/9 18/24 19/21 19/23 25/4 26/1 37/4 39/9 40/13 43/17 45/14 45/16 45/24 46/10 46/14 47/24 50/7 51/24 52/2 52/8 56/23 57/2 58/15 63/23 63/23 65/9 65/18 69/9 73/23 77/23 86/11 86/17 97/10 104/3 105/7 109/16 110/23 111/3 111/4 112/16 112/19 116/18 116/21 118/20 121/2 124/19 124/24 129/11 130/3 130/13 130/16 130/18 131/20 133/3 133/13 133/24 134/18 136/4 137/4 139/1 139/2 140/8 142/7 142/16 143/21 143/22 144/9 144/13 145/12 145/25 146/11 147/8 147/17 147/23 148/4 149/5 152/23 153/3 153/14 156/2 156/7 156/17 156/18 156/18 156/20 159/9 159/13 159/16 159/22 165/2 165/7 165/14 166/12 167/6 168/19 168/24 170/20 171/4 171/10 172/5 174/24 175/5 176/24 Whenever [1] 105/9	whether [55] 5/21 20/14 20/15 21/7 25/14 31/11 32/19 32/21 33/3 33/4 33/5 33/11 35/10 35/22 49/25 53/5 55/1 55/3 55/20 55/25 56/24 65/24 67/16 67/20 72/21 80/5 81/13 82/1 82/16 82/23 83/6 83/8 83/10 92/21 93/13 99/13 104/4 105/15 105/18 106/3 106/10 108/21 109/18 119/18 123/14 125/1 125/3 146/5 157/15 160/3 161/2 164/17 169/16 169/17 170/11 which [67] 2/15 11/11 12/8 20/13 22/2 22/17 22/18 28/18 32/11 42/9 50/13 51/4 54/9 57/16 59/13 60/16 61/23 62/8 62/8 62/19 62/20 66/17 69/17 70/16 74/20 77/2 77/2 77/4 84/2 100/18 100/20 114/23 115/23 116/10 120/22 123/10 126/4 126/9 131/5 132/13 132/18 134/15 134/16 136/18 136/21 138/17 140/14 141/25 146/11 148/12 151/4 155/11 156/3 156/6 158/24 159/12 162/3 162/22 163/12 164/2 164/12 164/13 165/19 166/7 169/9 170/22 172/8		

W	60/21 65/4 67/4 69/9 69/11 69/19 85/17 96/10 101/4 102/9 124/8 124/8 131/17 132/17 133/6 136/25 137/9 142/13 144/15 147/4 147/11 147/16 147/22 149/12 149/19 155/19 156/20 156/22 156/25 160/6 162/9 164/5 164/22 167/4 170/2 171/10 173/18	126/22 126/23 127/8 127/18 128/9 130/3 133/24 136/7 137/2 137/3 138/25 140/9 143/11 145/1 145/7 146/14 146/17 147/4 147/7 147/14 150/17 151/17 151/19 153/2 154/7 156/21 160/9 160/21 160/23 161/10 161/23 164/5 164/25 169/12 170/24 172/5 172/15 174/8 174/10 174/13 174/14 174/17 176/17 177/6	34/23 38/18 38/19 40/5 41/9 41/16 43/25 46/24 47/7 47/25 48/20 48/20 49/3 49/8 50/2 50/2 52/20 52/21 54/3 54/3 54/4 54/11 54/17 61/22 62/15 63/16 64/3 68/12 68/17 68/23 73/7 73/18 74/22 75/21 76/9 78/2 78/15 78/17 78/18 81/8 81/10 81/13 82/16 84/10 86/1 89/23 90/10 91/2 92/20 93/8 96/16 97/7 100/7 101/17 105/14 106/8 106/17 107/4 110/15 114/9 116/10 117/19 117/22 119/4 119/20 120/25 122/4 122/15 122/23 124/18 126/16 126/18 126/20 126/24 127/6 127/6 127/11 127/13 127/25 128/2 133/22 136/17 136/17 139/23 139/23 141/1 141/3 141/15 141/17 143/6 144/8 144/16 144/20 145/2 145/24 146/8 146/12 153/6 155/1 158/24 161/18 165/1 166/12 167/10 167/10 168/5 168/21 171/8 173/7 176/18 176/22
work... [10] 155/10 157/14 157/14 157/15 158/3 158/4 158/5 158/8 164/6 171/18	year [13] 12/22 15/12 19/21 24/15 51/15 51/16 115/23 128/11 137/1 142/22 147/3 149/12 172/1	yesterday [6] 14/19 21/2 78/23 79/15 145/10 152/22	50/2 50/2 52/20 52/21 54/3 54/3 54/4 54/11 54/17 61/22 62/15 63/16 64/3 68/12 68/17 68/23 73/7 73/18 74/22 75/21 76/9 78/2 78/15 78/17 78/18 81/8 81/10 81/13 82/16 84/10 86/1 89/23 90/10 91/2 92/20 93/8 96/16 97/7 100/7 101/17 105/14 106/8 106/17 107/4 110/15 114/9 116/10 117/19 117/22 119/4 119/20 120/25 122/4 122/15 122/23 124/18 126/16 126/18 126/20 126/24 127/6 127/6 127/11 127/13 127/25 128/2 133/22 136/17 136/17 139/23 139/23 141/1 141/3 141/15 141/17 143/6 144/8 144/16 144/20 145/2 145/24 146/8 146/12 153/6 155/1 158/24 161/18 165/1 166/12 167/10 167/10 168/5 168/21 171/8 173/7 176/18 176/22
workaround [4] 43/15 81/17 81/18 81/22	years [22] 4/5 12/14 23/23 24/8 56/10 65/18 71/24 72/2 94/20 94/23 97/23 101/21 115/12 143/24 150/5 162/21 162/23 170/20 171/5 175/1 175/2 175/7	yesterday's [1] 87/2	54/3 54/3 54/4 54/11 54/17 61/22 62/15 63/16 64/3 68/12 68/17 68/23 73/7 73/18 74/22 75/21 76/9 78/2 78/15 78/17 78/18 81/8 81/10 81/13 82/16 84/10 86/1 89/23 90/10 91/2 92/20 93/8 96/16 97/7 100/7 101/17 105/14 106/8 106/17 107/4 110/15 114/9 116/10 117/19 117/22 119/4 119/20 120/25 122/4 122/15 122/23 124/18 126/16 126/18 126/20 126/24 127/6 127/6 127/11 127/13 127/25 128/2 133/22 136/17 136/17 139/23 139/23 141/1 141/3 141/15 141/17 143/6 144/8 144/16 144/20 145/2 145/24 146/8 146/12 153/6 155/1 158/24 161/18 165/1 166/12 167/10 167/10 168/5 168/21 171/8 173/7 176/18 176/22
worked [19] 4/4 4/13 4/20 12/14 16/4 38/21 47/14 61/17 69/7 93/13 124/13 124/15 134/23 135/3 148/6 150/2 163/22 163/23 164/13	yellow [1] 100/18	yet [2] 92/1 172/7	54/3 54/3 54/4 54/11 54/17 61/22 62/15 63/16 64/3 68/12 68/17 68/23 73/7 73/18 74/22 75/21 76/9 78/2 78/15 78/17 78/18 81/8 81/10 81/13 82/16 84/10 86/1 89/23 90/10 91/2 92/20 93/8 96/16 97/7 100/7 101/17 105/14 106/8 106/17 107/4 110/15 114/9 116/10 117/19 117/22 119/4 119/20 120/25 122/4 122/15 122/23 124/18 126/16 126/18 126/20 126/24 127/6 127/6 127/11 127/13 127/25 128/2 133/22 136/17 136/17 139/23 139/23 141/1 141/3 141/15 141/17 143/6 144/8 144/16 144/20 145/2 145/24 146/8 146/12 153/6 155/1 158/24 161/18 165/1 166/12 167/10 167/10 168/5 168/21 171/8 173/7 176/18 176/22
working [12] 11/18 45/16 48/14 83/24 102/1 129/7 144/16 144/20 145/18 148/9 165/24 167/15	yes [167] 1/4 1/8 1/12 1/16 1/20 2/3 3/2 3/4 3/16 3/19 3/24 4/6 4/8 6/7 6/22 7/6 8/1 9/5 9/6 9/11 10/6 10/8 10/19 13/17 14/11 15/4 16/22 16/24 17/5 21/18 25/3 25/17 25/20 26/6 26/9 26/16 26/22 28/13 29/4 29/18 30/17 31/3 31/16 31/16 32/14 32/22 33/13 34/7 34/8 34/16 34/18 34/25 36/5 37/4 37/16 39/12 40/8 42/7 42/15 42/18 42/25 51/25 52/16 52/25 53/12 53/14 53/20 54/2 54/19 55/18 55/18 55/22 58/6 59/25 60/12 60/12 61/2 69/5 70/3 73/17 74/12 74/25 75/18 84/11 85/15 86/2 90/21 91/3 91/18 94/10 94/24 95/1 95/6 103/8 104/8 104/11 104/13 105/25 106/21 107/13 108/6 108/11 111/3 111/22 111/23 111/23 111/25 112/10 114/19 116/25 117/8 117/10 117/25 118/8 119/3 119/7 119/8 120/4 120/10 121/21 122/18 124/1 125/25	you [932]	54/3 54/3 54/4 54/11 54/17 61/22 62/15 63/16 64/3 68/12 68/17 68/23 73/7 73/18 74/22 75/21 76/9 78/2 78/15 78/17 78/18 81/8 81/10 81/13 82/16 84/10 86/1 89/23 90/10 91/2 92/20 93/8 96/16 97/7 100/7 101/17 105/14 106/8 106/17 107/4 110/15 114/9 116/10 117/19 117/22 119/4 119/20 120/25 122/4 122/15 122/23 124/18 126/16 126/18 126/20 126/24 127/6 127/6 127/11 127/13 127/25 128/2 133/22 136/17 136/17 139/23 139/23 141/1 141/3 141/15 141/17 143/6 144/8 144/16 144/20 145/2 145/24 146/8 146/12 153/6 155/1 158/24 161/18 165/1 166/12 167/10 167/10 168/5 168/21 171/8 173/7 176/18 176/22
workings [2] 44/23 118/4	you'd [13] 2/1 2/12 3/22 101/6 106/22 110/19 114/9 117/11 118/10 153/17 153/17 153/18 153/21	you [932]	54/3 54/3 54/4 54/11 54/17 61/22 62/15 63/16 64/3 68/12 68/17 68/23 73/7 73/18 74/22 75/21 76/9 78/2 78/15 78/17 78/18 81/8 81/10 81/13 82/16 84/10 86/1 89/23 90/10 91/2 92/20 93/8 96/16 97/7 100/7 101/17 105/14 106/8 106/17 107/4 110/15 114/9 116/10 117/19 117/22 119/4 119/20 120/25 122/4 122/15 122/23 124/18 126/16 126/18 126/20 126/24 127/6 127/6 127/11 127/13 127/25 128/2 133/22 136/17 136/17 139/23 139/23 141/1 141/3 141/15 141/17 143/6 144/8 144/16 144/20 145/2 145/24 146/8 146/12 153/6 155/1 158/24 161/18 165/1 166/12 167/10 167/10 168/5 168/21 171/8 173/7 176/18 176/22
workload [3] 93/24 97/5 97/7	you'll [1] 162/7	you're [34] 26/18 29/12 34/18 35/7 36/5 58/21 60/4 70/23 77/18 84/13 86/18 89/21 90/18 95/12 112/18 113/10 113/12 114/18 121/16 122/19 139/2 139/2 139/7 142/5 145/21 149/7 151/6 166/13 167/1 167/2 169/25 176/14 176/16 176/24	54/3 54/3 54/4 54/11 54/17 61/22 62/15 63/16 64/3 68/12 68/17 68/23 73/7 73/18 74/22 75/21 76/9 78/2 78/15 78/17 78/18 81/8 81/10 81/13 82/16 84/10 86/1 89/23 90/10 91/2 92/20 93/8 96/16 97/7 100/7 101/17 105/14 106/8 106/17 107/4 110/15 114/9 116/10 117/19 117/22 119/4 119/20 120/25 122/4 122/15 122/23 124/18 126/16 126/18 126/20 126/24 127/6 127/6 127/11 127/13 127/25 128/2 133/22 136/17 136/17 139/23 139/23 141/1 141/3 141/15 141/17 143/6 144/8 144/16 144/20 145/2 145/24 146/8 146/12 153/6 155/1 158/24 161/18 165/1 166/12 167/10 167/10 168/5 168/21 171/8 173/7 176/18 176/22
works [1] 39/24	you've [40] 9/17 9/17 29/14 45/10 47/17 47/24 49/2 49/20 53/4 54/11 54/17 63/7 78/15 79/18 95/3 107/3 109/6 113/5 120/25 124/2 124/3 127/9 139/4 139/7 139/16 139/18 142/1 142/4 154/19 154/20 154/21 154/21 154/22 155/6 164/13 165/7 165/14 165/18 166/11 177/1	yourself [10] 8/20 17/21 37/21 74/8 76/6 86/24 123/5 142/8 142/10 165/16	54/3 54/3 54/4 54/11 54/17 61/22 62/15 63/16 64/3 68/12 68/17 68/23 73/7 73/18 74/22 75/21 76/9 78/2 78/15 78/17 78/18 81/8 81/10 81/13 82/16 84/10 86/1 89/23 90/10 91/2 92/20 93/8 96/16 97/7 100/7 101/17 105/14 106/8 106/17 107/4 110/15 114/9 116/10 117/19 117/22 119/4 119/20 120/25 122/4 122/15 122/23 124/18 126/16 126/18 126/20 126/24 127/6 127/6 127/11 127/13 127/25 128/2 133/22 136/17 136/17 139/23 139/23 141/1 141/3 141/15 141/17 143/6 144/8 144/16 144/20 145/2 145/24 146/8 146/12 153/6 155/1 158/24 161/18 165/1 166/12 167/10 167/10 168/5 168/21 171/8 173/7 176/18 176/22
world [5] 84/18 85/5 85/10 142/6 157/14	your [151] 1/11 1/21 1/24 4/4 5/5 5/6 5/8 5/9 5/12 6/2 7/1 8/5 8/12 10/13 10/25 11/1 11/2 11/16 11/19 13/2 13/7 13/25 17/6 17/11 17/14 17/22 18/6 20/4 20/10 23/11 25/9 25/16 25/23 26/14 26/20 26/24 28/14 29/2 33/14 33/22		54/3 54/3 54/4 54/11 54/17 61/22 62/15 63/16 64/3 68/12 68/17 68/23 73/7 73/18 74/22 75/21 76/9 78/2 78/15 78/17 78/18 81/8 81/10 81/13 82/16 84/10 86/1 89/23 90/10 91/2 92/20 93/8 96/16 97/7 100/7 101/17 105/14 106/8 106/17 107/4 110/15 114/9 116/10 117/19 117/22 119/4 119/20 120/25 122/4 122/15 122/23 124/18 126/16 126/18 126/20 126/24 127/6 127/6 127/11 127/13 127/25 128/2 133/22 136/17 136/17 139/23 139/23 141/1 141/3 141/15 141/17 143/6 144/8 144/16 144/20 145/2 145/24 146/8 146/12 153/6 155/1 158/24 161/18 165/1 166/12 167/10 167/10 168/5 168/21 171/8 173/7 176/18 176/22
worth [4] 58/17 65/19 175/1 175/2			54/3 54/3 54/4 54/11 54/17 61/22 62/15 63/16 64/3 68/12 68/17 68/23 73/7 73/18 74/22 75/21 76/9 78/2 78/15 78/17 78/18 81/8 81/10 81/13 82/16 84/10 86/1 89/23 90/10 91/2 92/20 93/8 96/16 97/7 100/7 101/17 105/14 106/8 106/17 107/4 110/15 114/9 116/10 117/19 117/22 119/4 119/20 120/25 122/4 122/15 122/23 124/18 126/16 126/18 126/20 126/24 127/6 127/6 127/11 127/13 127/25 128/2 133/22 136/17 136/17 139/23 139/23 141/1 141/3 141/15 141/17 143/6 144/8 144/16 144/20 145/2 145/24 146/8 146/12 153/6 155/1 158/24 161/18 165/1 166/12 167/10 167/10 168/5 168/21 171/8 173/7 176/18 176/22
would [210]			54/3 54/3 54/4 54/11 54/17 61/22 62/15 63/16 64/3 68/12 68/17 68/23 73/7 73/18 74/22 75/21 76/9 78/2 78/15 78/17 78/18 81/8 81/10 81/13 82/16 84/10 86/1 89/23 90/10 91/2 92/20 93/8 96/16 97/7 100/7 101/17 105/14 106/8 106/17 107/4 110/15 114/9 116/10 117/19 117/22 119/4 119/20 120/25 122/4 122/15 122/23 124/18 126/16 126/18 126/20 126/24 127/6 127/6 127/11 127/13 127/25 128/2 133/22 136/17 136/17 139/23 139/23 141/1 141/3 141/15 141/17 143/6 144/8 144/16 144/20 145/2 145/24 146/8 146/12 153/6 155/1 158/24 161/18 165/1 166/12 167/10 167/10 168/5 168/21 171/8 173/7 176/18 176/22
wouldn't [27] 8/3 13/9 13/21 17/15 36/10 43/16 43/19 43/21 49/13 52/20 59/3 64/7 73/25 76/19 80/8 98/3 110/21 112/5 115/23 145/23 146/4 153/18 153/21 157/14 167/21 169/20 172/2			54/3 54/3 54/4 54/11 54/17 61/22 62/15 63/16 64/3 68/12 68/17 68/23 73/7 73/18 74/22 75/21 76/9 78/2 78/15 78/17 78/18 81/8 81/10 81/13 82/16 84/10 86/1 89/23 90/10 91/2 92/20 93/8 96/16 97/7 100/7 101/17 105/14 106/8 106/17 107/4 110/15 114/9 116/10 117/19 117/22 119/4 119/20 120/25 122/4 122/15 122/23 124/18 126/16 126/18 126/20 126/24 127/6 127/6 127/11 127/13 127/25 128/2 133/22 136/17 136/17 139/23 139/23 141/1 141/3 141/15 141/17 143/6 144/8 144/16 144/20 145/2 145/24 146/8 146/12 153/6 155/1 158/24 161/18 165/1 166/12 167/10 167/10 168/5 168/21 171/8 173/7 176/18 176/22
write [2] 47/7 80/23			54/3 54/3 54/4 54/11 54/17 61/22 62/15 63/16 64/3 68/12 68/17 68/23 73/7 73/18 74/22 75/21 76/9 78/2 78/15 78/17 78/18 81/8 81/10 81/13 82/16 84/10 86/1 89/23 90/10 91/2 92/20 93/8 96/16 97/7 100/7 101/17 105/14 106/8 106/17 107/4 110/15 114/9 116/10 117/19 117/22 119/4 119/20 120/25 122/4 122/15 122/23 124/18 126/16 126/18 126/20 126/24 127/6 127/6 127/11 127/13 127/25 128/2 133/22 136/17 136/17 139/23 139/23 141/1 141/3 141/15 141/17 143/6 144/8 144/16 144/20 145/2 145/24 146/8 146/12 153/6 155/1 158/24 161/18 165/1 166/12 167/10 167/10 168/5 168/21 171/8 173/7 176/18 176/22
writing [4] 25/25 39/4 39/11 146/8			54/3 54/3 54/4 54/11 54/17 61/22 62/15 63/16 64/3 68/12 68/17 68/23 73/7 73/18 74/22 75/21 76/9 78/2 78/15 78/17 78/18 81/8 81/10 81/13 82/16 84/10 86/1 89/23 90/10 91/2 92/20 93/8 96/16 97/7 100/7 101/17 105/14 106/8 106/17 107/4 110/15 114/9 116/10 117/19 117/22 119/4 119/20 120/25 122/4 122/15 122/23 124/18 126/16 126/18 126/20 126/24 127/6 127/6 127/11 127/13 127/25 128/2 133/22 136/17 136/17 139/23 139/23 141/1 141/3 141/15 141/17 143/6 144/8 144/16 144/20 145/2 145/24 146/8 146/12 153/6 155/1 158/24