

Friday, 26 April 2024

(9.45 am)

ANGELA MARGARET VAN DEN BOGERD (continued)

Questioned by MR BEER (continued)

SIR WYN WILLIAMS: Morning, everyone. Yes, Mr Beer.

MR BEER: Good morning, sir, good morning, Ms van den Bogerd.

We finished yesterday with some questions about the Post Office's management of Second Sight; do you recall?

Can I ask you to start this morning with some questions about some other significant events that were going on whilst the Post Office was managing Second Sight. It's the case of the late Martin Griffiths that I want to ask you about.

You tell us in your witness statement -- I'm not going to ask it to be turned up, it's paragraphs 149 to 158 -- about your involvement, quite significant involvement, in the case of Martin Griffiths; is that right?

A. Yes.

Q. Can we start with some background information, please. Firstly, Mr Griffiths was the postmaster at the Hope Farm Road Post Office in Great Sutton, Cheshire; is that right?

A. That's correct.

1

with Mr Chester?

A. Yes, I had.

Q. So he was a working colleague of yours; is that right?

A. On and off over the years, yes.

Q. It's 17 July 2013 and Mr Griffiths writes to Mr Chester:

"As you are aware, I have been a subpostmaster for 18 years and prior to the Horizon computer system I enjoyed a satisfactory post office business. For some considerable years I have been accused of wrongful accounting. Over the last 15 months alone, February 2012 to May 2013, more than £39,000 is deemed to be my shortfall, an average of £600 per week. This surely cannot be correct, but the notifications from the Post Office state this is the case.

"This worry has affected [and then there's a redaction] and plans for retirement have had to be postponed. I have not had a break in my business house for more than four years, to keep a tight rein on the office. The financial strain on myself and my family is devastating and continues on a daily basis.

"On advice of Mr Alan Bates from the JFSA, I have been advised to contact my local MP regarding the recent media coverage on the BBC News and in the Telegraph, regarding the investigation into the errors discovered in the Post Office's Horizon computer system.

3

Q. By the time of his death, he had been the subpostmaster there for some 18 years; is that right?

A. I don't remember exactly but it sounds about right.

Q. A series of shortfalls had arisen at the branch or were said to have arisen at the branch, and Mr Griffiths had been accused of being responsible for them?

A. That's correct.

Q. Notice of termination of his contract had been served on 3 July 2013?

A. Correct.

Q. Mr Griffiths and his family suggested that it was the Horizon system that was responsible for the losses.

A. Yes.

Q. On 17 July 2013, Mr Griffiths asked for his case to be put before the Post Office Board. I appreciate you wouldn't have received this letter at the time but I just want to show it as background to what did happen.

A. Yes.

Q. POL00145768. Thank you.

We can see this is a letter from Mr Griffiths, if we just scroll down, we can see it at the foot of the page, Martin K Griffiths, and we can see at the top of the letter it is addressed to Glenn Chester the Agent Contract Manager.

In your previous roles, had you come into contact

2

"I believe [the Post Office] has a Board meeting next week after all the media coverage, and would like my particular case to be considered along with the many others in a similar situation."

Now, I don't think you would have got this at the time; is that right?

A. That's correct. I've seen this this morning.

Q. Yes. So this letter of 17 July, just fitting this together with our chronology, would have been just before the board meeting that I think you do know about, the Post Office Limited board meeting, at which the issue of the Second Sight Report and what the Post Office was to do about it was to be discussed. I think you did know about that.

A. Sorry, I can't remember but probably, yes. If it --

Q. It was the one where -- did you know about this -- the one where Susan Crichton was made to sit outside on a chair?

A. Okay, I'm aware of it now. At the time, I wasn't aware that that was happening.

Q. So you didn't know that she was kept out of the meeting? It was proposed that she present a paper concerning what the Post Office should do into response to Second Sight and, instead of her presenting her paper, Ms Vennells presented it and she was sat outside on a chair?

4

1 A. So I only became aware of that listening to Susan's
2 evidence this week.

3 Q. That wasn't something that caused a stir at the time?

4 A. Susan leaving, yes, but there was very little
5 information around the background to that or the reasons
6 for that, speculation around anything to do with the
7 Second Sight but nothing -- there was no messaging, no
8 confirmation to us as to the reasons why.

9 Q. Okay. That letter can come down and just moving it
10 forwards a fortnight, on 31 July Mr Griffiths' mother
11 wrote to the Post Office. Can we just look at that,
12 please POL00147157. I think this is also a letter you
13 have been shown this morning?

14 A. This morning, yes.

15 Q. This all just background, some context for the Inquiry.
16 If we look at the foot of the page, we can see it was
17 from Doreen Griffiths, Mrs Griffiths, who I think was in
18 her 80s at this time?

19 A. Yes.

20 Q. If we look up, it's again to Mr Chester:
21 "I write to you as the parent of Martin Griffiths,
22 despite knowing that you say I am not part of the said
23 sub post office. My son has been under severe pressure
24 and I personally had to take on more work in the retail
25 side of the business, including providing financial

5

1 Office and we will seek legal advice to refute this."
2 I'll come back to that in a moment, what that's
3 referring to:
4 "If as stated, my son is terminated on 3 October
5 [three months from the 3 July letter], what is the
6 position for the incoming subpostmaster regarding the
7 £18,000 a year overheads? At present, this is shared
8 between the Post Office and the retail business,
9 therefore a legal arrangement needs to be made ...
10 "With regards to your outstanding figures for
11 repayment, only [£3,600-odd] remains as the [£3,000-odd]
12 plus £200 was repaid at the end of June.
13 "I await to hear your comments."
14 The reference to the robbery there, if we can look
15 at that, please, I think you now know and you found out
16 at the time of Mr Griffiths' death, that there had been
17 a robbery at the Post Office, is that right --
18 A. That's correct.
19 Q. -- and two armed robbers took over £50,000 from the Post
20 Office?
21 A. Yes.
22 Q. If we quickly look at the circumstances of that,
23 POL00342530.
24 Thank you. This a security report, we can see it's
25 dated 10 May and it's about the robbery on 2 May.

7

1 support for the shortages."
2 I think you later learned, is this right, that
3 Mr Griffiths' parents had been putting money into the
4 business, tens of thousands of pounds, to try to balance
5 the books.
6 A. Yes, I learned that later.
7 Q. They'd been using their savings, I think you learnt
8 later, their life savings, to try to balance the books?
9 A. Yes, that's what I learnt, yes.
10 Q. "The so-called shortages over many, many months have
11 been repaid mainly by myself and husband. Although you
12 can continue to say there is no fault in the Horizon
13 computer system, we eagerly await the results of the
14 ongoing investigation being undertaken by Second Sight
15 regarding software errors.
16 "Your letter of 3 July, stating termination of
17 Martin's contract, I feel is very harsh. Kevin Bridger
18 has compounded the severe problems adding insult to
19 injury (and I mean injury), by requesting a fine of
20 £7,600 which represents 20% of the robbery with violence
21 which occurred in May. It was due to the identification
22 of the culprit by a member of staff, that the police
23 were able to make a quick arrest and subsequently the
24 robber received an 8-year jail sentence. This request
25 for £7,600 suggests insufficient security at the Post

6

1 Although it's quite a long document, I just want to read
2 a summary of what was found on investigation and, if we
3 look, please, at the fourth page, thank you:
4 "At approximately 5.25 pm on Thursday, 2 May, Martin
5 Griffiths ... and his clerk Julie Griffiths (no
6 relation) were on duty and were putting all the cash and
7 stock away. Both safes were open.
8 "Mr Griffiths was stood at the secure door which
9 also housed the parcel hatch. The postman had arrived
10 to collect the mail, Mr Griffiths had put around 2 mail
11 bags outside of the secure door and the postman had
12 taken these out of the office to his van.
13 "As the postman re-entered the branch, two masked
14 men wearing dark clothing, one with a balaclava and one
15 with a stocking [over] his head burst in and pushed the
16 postman aside. Mr Griffiths stated that he was stood at
17 the secure door with the door open so he could hand the
18 daily work and giro pouch to the postman and get him to
19 sign for the paperwork and went over to the secure door.
20 "one man tried to pull the door open which the other
21 man attached the screen with sledge hammer."
22 If we look, we can see that in the photograph:
23 "Mr Griffiths attempted to get the door shut at
24 which point he believes he was hit on the left hand
25 with some sort of metal bar (possibly a crow bar). At

8

1 this point Mr Griffiths stopped fighting and allowed the
 2 2 men into the secure area. At this point the assistant
 3 Julie Griffiths had crouched down and hid behind the
 4 coin safe."
 5 Thank you. That can come down.
 6 I think the Post Office determined that Mr Griffiths
 7 was culpable for the robbery.
 8 **A.** I think that was the assessment, in terms of applying,
 9 as Doreen said 20 per cent. I wasn't sure how much it
 10 was, but --
 11 **Q.** Initially, I think they found him entirely culpable for
 12 the robbery, for breaching procedures --
 13 **A.** Mm-hm.
 14 **Q.** -- and required him to pay £38,000. Some of the money,
 15 I should say, I think £15,000-odd had been recovered --
 16 **A.** Yes.
 17 **Q.** -- from the robbers by the police, they'd actually found
 18 them, because of the information that Julie Griffiths
 19 had provided. Then that amount, for which he was found
 20 to be to blame, £38,000 was reduced to £7,500-odd, yes?
 21 **A.** Yes.
 22 **Q.** So the Post Office was blaming him for the robbery?
 23 **A.** For not complying with certain procedures at the time,
 24 yes.
 25 **Q.** Ie leaving the door open whilst the mailman came to
 9

1 Mr Arbuthnot and Jo Swinson, with the subject "Post
 2 Office read this":
 3 "This afternoon I received the following email, it
 4 is a prime example of the thuggery being exerted on
 5 defenceless subpostmasters (as [the Post Office] deny
 6 legal representation) by arrogant and uncontrolled Post
 7 Office personnel. Despite assurances from on high that
 8 this type of thing is in the past, it is clear from
 9 [Post Office's] actions, it is still alive and active
 10 through the ranks."
 11 Then the email he received:
 12 "Hello Alan.
 13 "I am writing on behalf of my son-in-law Martin
 14 Griffiths who has recently been in touch with you about
 15 the treatment doled out to him by the hierarchy at the
 16 Crown Office in Chester. He had an armed raid in May,
 17 and the faceless wonders at the Crown Office have
 18 intimidated he was culpable. Had him at the kangaroo
 19 court where he was not allowed any representation of his
 20 own, he was a broken man then.
 21 "However, he was sent for last Friday to attend a
 22 meeting with the Crown Post Office personnel again, and
 23 all [week] he has clearly not been himself.
 24 "This morning he drove off to work, got out of his
 25 car and walked in front of a bus.

11

1 collect the giro pouches?
 2 **A.** So I think it was the door and also the time lock on the
 3 safe was unset, I think, and that's from looking at the
 4 papers. I didn't know this at the time.
 5 **Q.** Okay. On 23 September 2013, I think you know that
 6 Mr Griffiths drove his car to a layby on the A41, got
 7 out of his car and deliberately stepped in front of
 8 an oncoming bus?
 9 **A.** Yes.
 10 **Q.** He was very seriously injured, taken to hospital, and
 11 remained in a coma for about three weeks.
 12 **A.** Yes.
 13 **Q.** On the 11 October 2013, his life support machine was
 14 switched off and he passed away that day. It was later
 15 concluded by a coroner that Mr Griffiths had taken his
 16 own life.
 17 I just want to see what happened within the Post
 18 Office when it was notified of what happened to
 19 Mr Griffiths. POL00162068.
 20 Can we look at page 4, please, and scroll down, and
 21 again please.
 22 On 23 September 2013, the day that Mr Griffiths
 23 walked in front of a bus, at 5.02 pm Mr Alan Bates
 24 emailed Paula Vennells, Susan Crichton, you and Andy
 25 Holt, copied to some other people, including
 10

1 "He is dangerously ill in hospital at Liverpool, the
 2 post office had driven him to suicide.
 3 "All the family are at the hospital, I am alone
 4 waiting by the phone for further news of him.
 5 "I would urge you to publicise this, another
 6 incident that has been caused by the Bully Boys at the
 7 Crown Office.
 8 "May God forgive them."
 9 Mr Bates continues:
 10 "I am aware of Martin's case, and I know he was
 11 terrified to raise his shortages with [the Post Office]
 12 because of just this type of thing happening to him, but
 13 [the Post Office] got him in the end. Regardless of
 14 what may or may not have occurred with him, why did [the
 15 Post Office] have to hound him to the point of trying to
 16 take his own life? Why?
 17 "Despite numerous warnings of never to attend any
 18 discussion with [the Post Office] without legal
 19 representation, Martin, trying to be helpful, didn't
 20 take anyone with him as per the conditions [the Post
 21 Office] demand. If [the Post Office] cannot control
 22 their personnel, then the very least they can do is
 23 authorise and insist on a subpostmaster taking legal
 24 representation with them to any meeting with [the Post
 25 Office].

12

1 "I am very, very angry about this, and as per the
2 wishes of the family I will be contacting many of the
3 media contacts we have built up over the years."

4 Back to page 4, please. Scroll down. We can see
5 that Ms Crichton forwards it, the email, to Roger, "Can
6 you help find the facts ... We really need them evening
7 ..."

8 A couple of minutes later Mark Davies says, "We must
9 get details of this this evening."

10 Mr Gilliland says:

11 "I have spoken to Roger who's trying to find out the
12 details."

13 Then if we scroll up a bit, so we can see the bottom
14 of page 3, we can see an email which distributes this to
15 you, yes, this chain to you, from Mark Davies, yes?

16 A. Yes.

17 Q. Mr Davies says:

18 "Thanks -- Susan, given the potential media element
19 please can we line up a specialist media lawyer in case
20 we need urgent advice this evening?"

21 So the immediate reaction, you agree, was not "Is
22 Martin Griffiths all right, what about his health?", was
23 it?

24 A. Not at this point in this email chain, no.

25 Q. The immediate reaction was not, "What can we, the Post
13

1 me. When I saw this -- and I didn't know Martin, this
2 was my first involvement in it -- then I was genuinely
3 concerned for the family, which is why I got involved
4 going forward.

5 Q. I think you're talking about much later. I'm asking
6 about what, on the face of the documents, the immediate
7 reaction of the Post Office is.

8 A. I mean, that is the immediate reaction. It's on the
9 email.

10 Q. Help us: is that what it was like working in the Post
11 Office at this time, that the first thought was "We need
12 a media lawyer here"?

13 A. I don't think it's the first thought, it was definitely
14 a consideration in everything that we did around, you
15 know, PR and the comms element. It was always
16 a consideration.

17 Q. Why was that an important consideration, brand image?

18 A. Throughout my --

19 Q. There's a man that walked in front of a bus here.

20 A. So all --

21 Q. One of your subpostmasters.

22 A. Sorry, in all my time with Post Office, from very early
23 on, I was very conscious that, you know, PR was very
24 important, and everything had to be -- you know, so that
25 involvement -- it was a Comms Team. So Mark was the

15

1 Office do to help this man's family?", was it?

2 A. Not at this point.

3 Q. "What about his wife and his children? What about his
4 elderly parents? What about his sister? Should we get
5 somebody down to the hospital?" That didn't happen, did
6 it?

7 A. Not getting somebody down to the hospital --

8 Q. No, the first thing was "Let's get a media lawyer".

9 A. So that's what Mark has said here.

10 Q. Is that what it was like working in this organisation at
11 the time? It was all about brand reputation, about
12 brand image?

13 A. So my concern here, when I got -- so the first I knew of
14 this is -- so it came in separately, I think, from,
15 I think, Martin's brother -- Martin's sister. So there
16 was a separate report to Glenn of a -- what I heard
17 originally was a traffic accident. We didn't know that
18 he'd actually deliberately walked in front of the bus at
19 that time. So, obviously, there's some more
20 correspondence because I've said -- so Roger was
21 actually, Roger Gale was actually running the Crown
22 Network at the time.

23 Q. This email chain tells you he walked in front of a bus.

24 A. No, sorry, something that came in separately. I'm
25 saying there was two kind of parallel notifications to

14

1 Head of -- he was the Comms Director at the time and
2 that clearly is his area and that's what he said.

3 Q. If we scroll up a little bit. You reply:

4 "This not related to the Crown branch but is
5 a [subpostmaster] case. I'm talking to the Contract
6 Adviser ..."

7 Is that Glenn Chester?

8 A. It is, yes.

9 Q. Then you emailed Mr Chester within an hour or so saying:

10 "Glenn

11 "This is what we are dealing with and the reason
12 I need to talk to you."

13 What did you mean "This is what we are dealing
14 with"?

15 A. So I think I might have reached out and left a message
16 saying, "I need to talk to you urgently" and that's just
17 me forwarding the information to him. Now, he
18 separately, I think, at this point already knew.

19 Q. But "This is what we are dealing with", were you saying
20 that it's because the hierarchy of the Post Office,
21 including Ms Crichton, Ms Vennells, were involved in
22 this now?

23 A. No, what I was saying is "I need to talk to you, this is
24 the information I have", and that's all the information
25 I had at that point. So I was simply forwarding it to

16

1 him. Like I say, I'm sure I left him a voicemail to
 2 say, "I need to talk to you urgently".

3 **Q.** Why not "Glenn" or "Mr Chester, what's being done for
 4 the family here"?

5 **A.** So, I mean, this was me just forwarding it very quickly
 6 because I wanted to understand what, you know, what has
 7 happened here because I was not sighted on this case at
 8 all.

9 **Q.** Thank you. That can come down.
 10 About a year after Mr Griffiths' death, his daughter
 11 wrote to the Post Office and that was forwarded to you,
 12 wasn't it?

13 **A.** I had an email from Lauren, yes.

14 **Q.** Can we look, please, at POL00306234.

15 **SIR WYN WILLIAMS:** Mr Beer, I don't know whether it's just
 16 here but, every now and then, we're not quite catching
 17 what's happening. So could everyone speak up.

18 **A.** Sorry, I'm not speaking loud enough.

19 **SIR WYN WILLIAMS:** Maybe it's not affecting the hall but
 20 for, whatever reason here, every now and then the words
 21 tail off, all right?

22 **A.** Sorry, sir, I'll speak louder.

23 **MR BEER:** Is it both Ms van den Bogerd and me?

24 **SIR WYN WILLIAMS:** Yes, it's both sides actually.

25 **MR BEER:** It might be to do with the amplification.

17

1 "I understand that you are putting what you
 2 discussed with my Mum yesterday in writing to her. It
 3 appears from what I have heard that you are offering the
 4 £140,000 'compensation payment' on the condition that we
 5 drop any action or legal recourse with the Post Office
 6 for any further compensation for its wrongdoing.

7 "No amount of financial compensation could replace
 8 the fact that the Post Office has taken our Dad away
 9 from our family but simply put, £140,000 'compensation'
 10 for our Dad's life is simply disgusting.

11 "I request that you escalate this matter and you
 12 forward this email on to the relevant parties within the
 13 Post Office. As stated above, this has dragged on for
 14 almost a year; the way in which the Post Office has
 15 dealt with this matter has been inadequate and
 16 incompetent.

17 "We will get back to you once we have received your
 18 response in writing. I would also appreciate a response
 19 to this email."

20 Was it right that you were offering £140,000
 21 compensation on condition that the family drop any
 22 action or legal recourse?

23 **A.** So this -- what we were offering here was the equivalent
 24 of a Network Transformation payment.

25 **Q.** Just explain what the equivalent to a Network

19

1 So we've got it up on the screen. So we're now
 2 about a year after Mr Griffiths' passing and his
 3 daughter, Lauren, wrote to you. She says:
 4 "Angela.
 5 "After speaking with my mum yesterday I am emailing
 6 you to let you know how disgusted we are with the
 7 treatment our family has received from the Post Office.
 8 "As you are well aware it has now been almost a year
 9 since we lost our Dad. We hold the Post Office solely
 10 and wholly responsible for what happened to him. As
 11 I am sure you can imagine, our family has had
 12 an extremely tough year, with what I consider no support
 13 from the Post Office.
 14 "My Dad was the main income earner for our family,
 15 without this income my family has been struggling to get
 16 by financially. My Mum cannot work in the shop of the
 17 Post Office due to the severe ill feeling she holds for
 18 it, and [redaction] with the stress and workload of
 19 keeping the shop open.
 20 "Considering the financial size of a business such
 21 as the Post Office Limited, I cannot comprehend how our
 22 family has not been supported or compensated this past
 23 year. I firmly believe that we would not have received
 24 this kind of treatment from any other large corporate
 25 organisation.

18

1 Transformation payment is?

2 **A.** So there's -- and there's quite a lot of correspondence
 3 before we get to this email, which I don't know if
 4 you're going to go to but it gives the background. So,
 5 at this time, the Post Office was running a Network
 6 Transformation Programme which was compensation payment
 7 for a postmaster for loss of office, to leave their
 8 branch, for it to be transferred to a new postmaster,
 9 and it was all part of the refurbishment plan. So the
 10 compensation payment for that loss of office, I think,
 11 was equivalent to 26 months' remuneration and that was
 12 a set calculation that was being offered to postmasters
 13 throughout the network. So --

14 **Q.** Just briefly then, why was that loss of office figure
 15 determined to be the appropriate figure to offer
 16 Mr Griffiths' widow and family?

17 **A.** So this -- so what we did here or tried to do here is,
 18 prior to Martin's death, he had registered an interest
 19 in leaving the Network via the Network Transformation
 20 Programme but when he was served three months' notice
 21 that deemed him -- he was no longer eligible because he
 22 didn't have a contract or he was on notice of his
 23 contract so, at that point, he wasn't eligible any
 24 longer.

25 So what I tried to do here is, just go back to the

20

1 situation of processing the Network Transformation
 2 payment for Gina Griffiths, so that she could have --
 3 what he was trying to do was have payment for loss of
 4 office in terms of him leaving the Network. So what
 5 Lauren is saying here is, if this is packaged as
 6 a payment for his life -- and that was never the
 7 intention, and I did respond to Lauren because, I mean,
 8 I had met with Lauren previously, so after Martin's
 9 death I had met with Gina, his wife, and his mother at
 10 the same time.

11 **Q.** That was at a local pub?

12 **A.** At their request, yes, at their request, because it was
 13 more private, away from the office. So I met them at
 14 the local pub and it was private. And what I'd said --
 15 and it was genuinely to give them as much support as
 16 I could and I said I'd be very happy to meet with
 17 anybody else from the family if they wanted to talk to
 18 me, and Lauren asked if I would meet with her and I met
 19 with her in London because that's where she was working.

20 So I met with Gina and her mother-in-law in the
 21 November and I think it was the same month I met with
 22 Lauren, as well, and I met with Gina Griffiths and her
 23 brother on 1 September, which is what's triggered this
 24 email from Lauren.

25 **Q.** But the way it was being put by you, it was your idea,

21

1 So it was never -- the intention was never linked to
 2 a payment for his loss of life. That was never the
 3 intention.

4 **Q.** But they had a live claim with Second Sight, didn't
 5 they, that was being mediated, about the losses, the
 6 alleged losses, the shortfalls?

7 **A.** So there was an application into the scheme, yes --

8 **Q.** This was going to be conditional on dropping that too
 9 wasn't it?

10 **A.** That was the broader piece of the Network
 11 Transformation, it covered everything.

12 **Q.** What does that mean? That's just word soup?

13 **A.** Sorry --

14 **Q.** "That was the broader piece of the Network
 15 Transformation" thing --

16 **A.** So --

17 **Q.** What I asked you, Ms van den Bogerd, is: this payment
 18 was going to be conditional on the family withdrawing
 19 the claim they'd made under the Mediation Scheme, wasn't
 20 it?

21 **A.** Yes, because that's the way the Network Transformation
 22 payment was set out. Now, having met with Gina and her
 23 brother on 1 September to discuss what that would look
 24 like, I had some -- so, in that conversation, they'd
 25 asked me to consider is there a way that we could at

23

1 wasn't it?

2 **A.** To get the payment, I wanted -- yes, so I was -- I was
 3 concerned that -- you know, so there was clearly the
 4 financial pressure on the family because, as they said
 5 here, Martin was the main earner. I mean, I didn't know
 6 that at the time but, clearly, he was the postmaster,
 7 and I was trying to facilitate a way for that payment to
 8 be made because that's -- that was what his intention
 9 was prior to his death.

10 **Q.** But it was going to be conditional on dropping any claim
 11 that the family had against the Post Office, wasn't it?

12 **A.** So the way the Network Transformation payments were
 13 structured, it was subject to a non-disclosure agreement
 14 and it was a final full settlement of all claims both
 15 ways. That was the structure of that Network payment so
 16 all I was --

17 **Q.** That's for subpostmasters who were just leaving the
 18 business because of part of the Post Office's closure
 19 programme, essentially. I mean, I know it's called
 20 Network Transformation but --

21 **A.** Yes.

22 **Q.** -- it involved closing thousands of branches?

23 **A.** Yes, but that is what this was intended to do. I was
 24 trying to just replicate that for Martin Griffiths and
 25 Mrs Griffiths, so that we could facilitate that payment.

22

1 least facilitate the investigation into the case and
 2 allow some time, so there was -- out of that
 3 conversation, then we structured a way forward that
 4 would allow Gina to -- we could try and facilitate the
 5 Network Transformation, the transfer of the Post Office
 6 to an incoming postmaster and the discretionary payment
 7 we would put on hold, whether she wanted to accept or
 8 not, subject to her receiving the scheme report, and
 9 that's what we structured to allow her the opportunity
 10 to decide whether she wanted to accept this
 11 discretionary payment or not, but she could still go
 12 ahead with the transfer of the Post Office.

13 **Q.** It was important to the Post Office to ensure that the
 14 Griffiths claim that had been lodged with the mediation
 15 was withdrawn, wasn't it?

16 **A.** No.

17 **Q.** The last thing the Post Office wanted was the bad
 18 publicity of the Griffiths claim being progressed
 19 through the Mediation Scheme, wasn't it?

20 **A.** No, that was never my consideration. My consideration
 21 was to support the family.

22 **Q.** Can we look, please, at POL00306172. I think this was
 23 a draft letter you prepared for sending to Mr Griffiths'
 24 widow, Gina, yes?

25 **A.** Yes.

24

- 1 **Q.** If we scroll down, you say:
 2 "... Martin was not eligible for a [Network
 3 Transformation] Leavers Payment as he had been served
 4 3 months' notice of contract termination ...
 5 "... in recognition of [his] service ... the Post
 6 Office would like to offer you ... a discretionary
 7 payment of £140,000."
 8 That's equivalent to the sum offered to
 9 subpostmasters who choose to leave.
 10 **A.** Yes.
 11 **Q.** "I note that you have made an application on behalf of
 12 your husband to the Initial Complaint Review and
 13 Mediation Scheme ... When a discretionary payment is
 14 offered, the normal process is for it to be made into
 15 full and final settlement of any claims that
 16 a subpostmaster had against Post Office Limited."
 17 Just stopping there, this says that was normal but
 18 the terms on which the Post Office could make this offer
 19 were completely discretionary, weren't they? It was up
 20 to the Post Office to decide the terms on which the
 21 offer was made?
 22 **A.** Yes.
 23 **Q.** It could be on any terms the Post Office choose to put
 24 forwards?
 25 **A.** Yes.

25

- 1 **Q.** Then you continue:
 2 "... your preference is to see the outcome of the
 3 investigations into your Application before making
 4 a decision on how to proceed but you also wish to move
 5 forward with the sale of your branch.
 6 "To accommodate both these objectives, the Post
 7 Office agrees to pay the Discretionary Payment subject
 8 to the following conditions ...
 9 "1. Post Office finds a suitable alternative
 10 operator ...
 11 "2. The successful alternative operator enters into
 12 a legally binding but conditional ... contract ...
 13 "3. You sign and return the attached Confirmation
 14 of Transfer document confirming you wish to transfer of
 15 the Branch to the new operator to proceed immediately.
 16 You have the option to accept the discretionary payment
 17 at the point of the transfer completing or alternatively
 18 you can defer the discretionary payment for 6 months for
 19 you to review the findings of both Post Office's and
 20 Second Sight's investigations into your Application
 21 (both of which should be with you within the next
 22 2 months) and, if appropriate, mediate your Application
 23 with the Post Office, before deciding whether ... to
 24 accept the discretionary payment."
 25 Is that what you were referring to earlier?

27

- 1 **Q.** The normal situation that you're referring to there was
 2 a common or garden postmaster who was simply deciding to
 3 exit the business as part of the programme, as part of
 4 the Post Office's general closure programme?
 5 **A.** Yes.
 6 **Q.** These are rather different circumstances, aren't they?
 7 **A.** I mean, it's very tragic circumstances and --
 8 **Q.** And therefore very different?
 9 **A.** Yes.
 10 **Q.** So why were you saying this was all normal, that the
 11 payment has to be in full and final settlement of any
 12 claims, whereas this was a very different situation
 13 here. There was an outstanding mediation claim.
 14 **A.** So this was being done in parallel, so what I was trying
 15 to do was why facilitate the payment to Gina and the
 16 family at that time. Anything to do with the scheme
 17 claim would have taken a lot longer. I mean, at this
 18 point the application into the scheme had been quite
 19 delayed from Gina and her advisers at the time.
 20 **Q.** You continue:
 21 "In this case, acceptance of the Discretionary
 22 Payment will therefore come with a waiver of any claims
 23 under your Application and bring that Application to
 24 a close", ie that's the application in the scheme, yes?
 25 **A.** Yes.

26

- 1 **A.** Yes.
 2 **Q.** "4. You sign ... the response slip ...
 3 "5. You sign and return the attached Withdrawal
 4 Notice ..."
 5 Can I turn then to what next happened, by looking at
 6 POL00219796, which is email advice to you from Rodric
 7 Williams in January 2015, saying:
 8 "Please find attached the draft settlement ..."
 9 I'm not, in the interests of time, going to look at
 10 the draft settlement:
 11 "... setting out the basis on which the Hope Farm
 12 Road has been resolved.
 13 "The agreement has been drafted to resolve all
 14 claims that either the deceased (Mr Griffiths) or the
 15 applicant (Mrs Griffiths) may have against [the Post
 16 Office]. Equally the agreement also resolves any claims
 17 [the Post Office] has against the deceased or his
 18 estate, ie we will not be able to seek recovery of any
 19 outstanding losses in the branch accounts or incurred
 20 through the robbery at the branch. Please let me know
 21 if this is *not* our intention."
 22 Was that still a live question --
 23 **A.** I mean, there were --
 24 **Q.** -- making the claim against Mr Griffiths' estate for the
 25 robbery?

28

1 A. So that was still open at this point. Yeah.
 2 Q. You were still thinking of suing his estate?
 3 A. No, it hadn't been concluded. So, at the point of
 4 which -- of Martin's death, then the -- if I remember
 5 correctly, the outstanding debt was still live on his
 6 account and the robbery of £7,000, or whatever that was,
 7 was still -- yeah. But from my -- my intention was
 8 never to recover any of that and we didn't.
 9 Q. He continues:
 10 "You will note from paragraph 2.1 that Mrs Griffiths
 11 has agreed to staged payments, which we asked for as
 12 an incentive to Mrs Griffiths maintaining
 13 confidentiality. As drafted, if Mrs Griffiths' were to
 14 breach confidentiality, we could stop any further
 15 payments but not recoup sums already [made]. Please let
 16 me know if you would like the agreement to be amended to
 17 give us that right."
 18 Mr Williams is saying that the provision in the
 19 agreement for staged payments to Mrs Griffiths were
 20 included as an incentive to her to maintain
 21 confidentiality. That was important for the Post
 22 Office, wasn't it?
 23 A. It was from Rodric. I mean, that was nothing I'd ever
 24 discussed. I mean, that came ... so I wasn't involved
 25 in this -- in the initial -- sorry. Rodric was drawing
 29

1 directly with her solicitor.
 2 SIR WYN WILLIAMS: So are you saying that Mr Williams
 3 thought that including a clause to this effect would be
 4 beneficial to the Post Office and, therefore, included
 5 it in the draft?
 6 A. That's my understanding.
 7 SIR WYN WILLIAMS: Right.
 8 A. Yeah.
 9 SIR WYN WILLIAMS: Did it remain in the settlement
 10 agreement?
 11 A. It did because what he was saying --
 12 SIR WYN WILLIAMS: So that must mean that the Post Office,
 13 and from what I gather you said, you, approved that?
 14 A. Yes.
 15 SIR WYN WILLIAMS: Right. Thanks.
 16 MR BEER: Did you see anything unsavoury in using money as
 17 a way of ensuring Mr Griffiths' case was hushed up?
 18 A. It wasn't something that I discussed with Gina and her
 19 brother and it didn't even enter my head that we would
 20 be going down that road. This was the first I heard of
 21 it from Rodric and the fact that he said it was
 22 accepted, then I just allowed it to continue.
 23 Q. So you agreed with the idea that we should use the drip
 24 feeding of money to the widow as a means of ensuring
 25 that she keeps it hushed up?
 31

1 up the settlement agreement with Mrs Griffiths'
 2 solicitor. I'd had an earlier conversation with
 3 Mrs Griffiths' solicitor, when Gina contacted me --
 4 contacted me via her solicitor to see if we would
 5 actually settle the case with her, and this is after the
 6 meeting.
 7 So I had the meeting on 1 September. I'd written
 8 the letter and sent that to Mrs Griffiths and, on the
 9 basis of the conversation I'd had with her and her
 10 brother on the 1st, I didn't anticipate that we would be
 11 proceeding with the payment because I got the impression
 12 that she wanted to wait to see what the outcome of the
 13 investigation into the scheme case was.
 14 Q. This is about a different issue. This is about the Post
 15 Office staging payments to act as an incentive to her,
 16 a Sword of Damocles hanging above her head: you don't
 17 get any more money unless you keep quiet. That's what
 18 this is, isn't it?
 19 A. So that's what Rodric was setting out and I presume he'd
 20 had that conversation with a solicitor.
 21 Q. No, but he must have had some instructions?
 22 A. He didn't from me at that time, he'd already had that
 23 conversation.
 24 Q. With who?
 25 A. I presumed with her solicitor because he was dealing
 30

1 A. I went with what he'd suggested here, yes, I did.
 2 Q. Did you see anything unsavoury into that?
 3 A. I mean, my concern at the time was facilitating that
 4 payment to Gina. That was my -- because I'd -- I'd had
 5 to have lots of conversations to get to this point and
 6 I'd structured it, I felt, as best I could, to give her
 7 the flexibility to be able to transfer the Post Office,
 8 which is what she and her mother-in-law wanted to do,
 9 and give her the option to be able to consider the
 10 outcome of the scheme investigation before her making
 11 a decision going forward.
 12 Sorry, at that time, I felt that I'd done as much as
 13 I could to facilitate that and to help the family
 14 financially.
 15 Q. At the point that Mr Griffiths died, there was a live
 16 dispute about the cause of the losses in his branch,
 17 wasn't there?
 18 A. Sorry, when you mean a "live dispute", what do you mean?
 19 In terms of the scheme?
 20 Q. We've seen some letters that he had written to the Post
 21 Office and his mother had written to the Post Office
 22 saying that the cause of those was Horizon?
 23 A. So there was two things in parallel, looking at this,
 24 and, as I wasn't involved prior to the notification of
 25 Martin walking in front of the bus was there -- the case
 32

1 had been concluded with Glenn Chester and, therefore,
 2 that had -- he'd been served three months' notice, and
 3 then what we had going in parallel was the scheme, which
 4 was the route into for us to look at -- at his case.
 5 **Q.** In the scheme, it was being said that the losses had
 6 been caused by Horizon, not by the late Mr Griffiths?
 7 **A.** When we got to investigating that, yes.
 8 **Q.** Wouldn't the correct, the respectful, the compassionate
 9 course of action to be to provide the family with
 10 a discretionary payment and allow the claim under the
 11 Mediation Scheme to proceed to its conclusion, so that
 12 the rights and wrongs of the cause of the losses in the
 13 branch could be established under the scheme?
 14 **A.** So what I was trying to do was to facilitate the payment
 15 to Gina and the best route I could do to get the
 16 business to agree, was to do that through the Network
 17 Transformation Payment because that mechanism was
 18 already set up, and that's what I tried to do. I tried
 19 to give Gina the flexibility, so that she had time to
 20 consider what the outcomes of the investigation by Post
 21 Office and Second Sight were before she needed to agree
 22 whether she wanted to pursue the claim through mediation
 23 or whether she wanted to accept this discretionary
 24 payment.
 25 **Q.** Do you recall that the JFSA asked the Post Office not to

33

1 wanted to accept that payment, and that was the -- that
 2 was the process that was in place. But it wasn't my
 3 place to have that conversation.
 4 **Q.** Is the long and the short of it that you procured
 5 a settlement on the basis of £140,000 payment, which
 6 figure applied to a completely different type of loss;
 7 you ensured that there was a non-disclosure agreement
 8 attached to that settlement; you agreed to the staging
 9 of payments to act as an incentive, using money as
 10 a tool to keep the matter hushed up?
 11 **A.** So it was never to keep the matter hushed up. Any
 12 settlement agreement that the Post Office ever entered
 13 into was done with a non-disclosure agreement.
 14 **Q.** Why?
 15 **A.** Because that was just the way they operated. That was
 16 just always the way --
 17 **Q.** Just why? Just take a step back from the answer of
 18 an automaton; why does the Post Office always insist on
 19 non-disclosure?
 20 **A.** Because that's what -- how they tied up the agreement
 21 and --
 22 **Q.** Yes, but why?
 23 **A.** Well, I just accepted that that was the standard
 24 approach in all settlement agreements and that was how
 25 they'd all operated and still do today, I believe.

35

1 approach Mrs Griffiths without involving them?
 2 **A.** I do recall that, yes.
 3 **Q.** Did you ignore that request?
 4 **A.** No, Gina approached me.
 5 **Q.** You thought that there was no need to tell the JFSA
 6 about that?
 7 **A.** So, in terms of the confidentiality, that was with Gina.
 8 It wasn't my place to tell JFSA. Gina had approached me
 9 via her solicitor, and I respected the fact that she
 10 wanted to do that privately and not in the arena of the
 11 scheme. So I went with her wishes.
 12 **Q.** Would you agree that the JFSA only discovered that you
 13 had negotiated this settlement with the family when the
 14 Working Group was notified that the case should not come
 15 to mediation because it had been settled?
 16 **A.** So my expectation was that Gina would have spoken --
 17 I mean, she had been in touch with Alan Bates and
 18 throughout here -- throughout this situation and she was
 19 having those conversations. It wasn't for me to tell
 20 JFSA of what Gina was considering doing. That was
 21 a private matter, and I respected the confidentiality of
 22 Gina in doing that, so that wasn't for me to pass that
 23 on.
 24 The formal route was the, you know, signing -- there
 25 was a draft withdrawal notice for Gina to sign, if she

34

1 **Q.** Because it liked secrecy?
 2 **A.** So they wanted to settle the claims and wanted to draw
 3 a line under that engagement -- I'm not talking about
 4 this engagement, by the way, I'm talking about in
 5 general terms -- that was how they'd always proceeded.
 6 Now, in this case --
 7 **Q.** I should say the document can come down.
 8 **A.** Sorry, can I just -- on this case, the £140,000 was the
 9 payment for the Network Transformation Payment.
 10 I believe that the actual settlement was different but
 11 I'm not party to what that looked like because that
 12 conversation had happened between Rodric and her
 13 solicitor.
 14 **Q.** Thank you. I'm going to move on to a separate topic, my
 15 second topic of this morning, which is the Lepton Branch
 16 and the Helen Rose report. I think you were first told
 17 about the Lepton Branch issue in early 2013; is that
 18 right?
 19 **A.** So that was when Ron was doing the spot review on the
 20 Lepton Branch.
 21 **Q.** Let's just look at some emails to nail it down.
 22 POL00141489. Can we start on page 2, please, and can we
 23 see an email there from Mr Warmington to you --
 24 **A.** Yes.
 25 **Q.** -- of 23 January 2013, concern reported by John

36

1 Armstrong, second sentence:
 2 "We have more on this case, which I'll send you
 3 soonest but the following email trail should give you
 4 a flavour of it ... [John Armstrong] is one of many
 5 subpostmasters who have referred to
 6 communication-fail-induced automatic (Horizon generated)
 7 transaction reversals where they are not advised of
 8 those reversals by Horizon and only get to know of (some
 9 of) them much later.

10 "As you all know, Fujitsu have rejected assertions
 11 that communication blips can give rise to 'lost'
 12 transactions. We are seeing many of those assertions
 13 and some, like this one, that might just be true.

14 "... apologies for the fact that in the first ...
 15 email chain, John Armstrong's summary of what happened
 16 and of the amounts involved was slightly out.

17 "We are at the stage there we need the Post Office
 18 to assign us a point of contact with clear instructions
 19 on who to CC to get to the bottom of these quite
 20 complicated transactional issues. If we have to wait
 21 for the Fujitsu data to be supplied, unravelled and
 22 examined for each one, we'll not be able to clear them
 23 before next Christmas."

24 So it's a lost transaction issue, yes?

25 A. Yes, it was a reversal.

37

1 Why were you sending it on to Andrew Winn?

2 A. Because Andrew -- sorry, Andy, as I know him -- he had
 3 dealt with the situation, I think, so he was the Dispute
 4 Resolution Manager in Chesterfield and I wanted to talk
 5 to him about what he'd seen in this case.

6 Q. The idea that transactions could be lost would have been
 7 rather important news for the Post Office, wouldn't it?
 8 It's a significant problem?

9 A. So understanding what had gone on in this situation,
 10 yes, this was the whole point of what Ron was trying to
 11 do and I was trying to support the information flow to
 12 him, so that we could understand what had happened here.

13 Q. The point that Mr Warmington was making was that there
 14 was nothing to alert the subpostmaster that the system
 15 had reversed the transaction?

16 A. That's what he was saying at the time, yes. That wasn't
 17 the conclusion but that's what he thought at the time.

18 Q. Can we go on, please, to FUJ00229801. I should have
 19 said, if we just scroll to the top of that page, you
 20 sent this on to Helen Rose?

21 A. Yes.

22 Q. Why did you send it on to Helen Rose?

23 A. Because I wanted Helen's support in understanding the
 24 information from Fujitsu. So Ron, in the email chain,
 25 had said he was having problems getting -- or he had to

39

1 Q. Just explain to us what you then understood the issue to
 2 be. You've described it there as a reversal?

3 A. So the actual detail of this case or just a reversal?

4 Q. The detail of this.

5 A. Okay, so I understand, you know, what happened here is
 6 that a customer came in to pay a BT bill, a phone bill
 7 and, in the process of processing that payment, the
 8 system lost connectivity.

9 Q. So the communication fail?

10 A. Yes. So the screen went blank and the postmaster was
 11 unable to process the payment. So what he did in the
 12 interests of dealing with the customer, he actually took
 13 the money and stamped the customer's receipt to say that
 14 "You've paid the bill", and that the customer had left.

15 So that was -- but when the system came back up --
 16 I'm sorry, I'm trying to remember the detail here -- the
 17 transaction was actually reversed, which meant that,
 18 even though the customer had paid the bill, as far as
 19 they were concerned, the bill had not been processed
 20 through the system and, therefore, it was -- as far as
 21 BT would have been informed, that bill had not been
 22 paid.

23 Q. Thank you. If we go forward to page 1, please, at the
 24 foot of the page, you reply:

25 "Sending it on to Andrew Winn."

38

1 wait to get the information from Fujitsu, it would take
 2 an age. Having -- what Helen had done with Ferndown and
 3 pulling that information for me couple of years earlier
 4 than that, I went to her to see whether she could do the
 5 same, so that we could facilitate that information flow.

6 Q. Thank you. FUJ00229801. If we start at page 2, please,
 7 you're emailing Gareth Jenkins directly by this time --

8 A. Yes.

9 Q. -- at the foot of the page. That's it.

10 A. That's right.

11 Q. "Thanks for your help. I thought we had already asked
 12 for formal help on this case but if this is not the case
 13 then I do wish to process such a request -- could you
 14 advise of the process ... I absolutely need to be able
 15 to articulate what's happened here so given that you are
 16 probably the person that can help formally I look
 17 forward to our future correspondence."

18 Were you taking the lead here?

19 A. So I was trying to get the information from Fujitsu so
 20 that we could share that with Second Sight.

21 Q. Were you taking the lead here?

22 A. In essence, yes, because, I mean, I wasn't aware of what
 23 the process was, which you can see from my note, and
 24 I wanted to hurry it up.

25 Q. Liaising directly with Gareth Jenkins?

40

1 A. On the back of I'd seen some correspondence between --
 2 I think Helen had copied me into something earlier, so,
 3 yes. I reached out to try and push it ahead.
 4 Q. Can we move on, then, to POL00134139, and, again, start
 5 with page 2, please. Sorry, I should have started with
 6 page 1. If we go to the top of page 1, you're forwarded
 7 the entire chain here between Helen Rose and Gareth
 8 Jenkins about Lepton, the branch in which this had
 9 originally occurred --
 10 A. Yes.
 11 Q. -- with Ms Rose saying to you:
 12 "Email string may be of interest. I'm not really
 13 sure where to take this. Happy to try for a change
 14 request ... I don't want to tackle one small issue when
 15 we may need to challenge deeper issues with the way we
 16 see data from Fujitsu/Credence".
 17 Then, if we look down, please, at the foot of the
 18 page, thank you, at the email to Helen Rose from Gareth
 19 Jenkins, and then carry on. Then carry on to Helen
 20 Rose's email to Gareth Jenkins:
 21 "I can see where the transaction is and now
 22 understand the reason behind it. My main concern is
 23 that we use the basic ARQ logs for evidence in court and
 24 if we don't know what extra reports to ask for then in
 25 some circumstances we would not be giving a true

41

1 A. No, so that -- the change request was in relation to
 2 changing the ID on the transaction, so it was obvious
 3 that it had not been done by the postmaster or whoever
 4 was in branch but that it was a separate ID, so it was
 5 easily identified to -- that this was a system reversal
 6 rather than a reversal that was initiated by the
 7 postmaster, in this case.
 8 Q. Go back to the top of page 1, please. In that second
 9 paragraph, she is raising a broader issue there, isn't
 10 she, with you, saying, "I don't know where to go with
 11 this. I have discovered, as a result of this case, that
 12 the ARQ logs that we use in court do not show or may not
 13 show a true picture. We may not be giving the court
 14 a true picture".
 15 A. That's not how I read this. I read this as "I'm not
 16 sure where to take this, happy to try for a change
 17 request". So that was -- is how I read this. Now,
 18 I don't --
 19 Q. Are you saying that you now recall how you read this?
 20 A. No, that's -- so what I'm saying is that, when I've --
 21 when I've read this, then I read that as "I don't know
 22 where to go with this but I can do a change request if
 23 you want me to". I've not seen any further email
 24 correspondence on this.
 25 Q. You didn't do anything, according to the email chains

43

1 picture."
 2 When you read this chain or this part of the chain,
 3 would that have sounded alarm bells to you?
 4 A. So not at the time. I mean, I was trying to get to the
 5 bottom of what had gone on in Lepton for the spot
 6 review. I wasn't familiar with how Helen and that team
 7 worked, other than if there was anything unusual or
 8 important or anything else, I expected her to be able to
 9 raise that through her reporting line --
 10 Q. What the person you had asked, within Post Office, the
 11 analyst, to do, ie liaise with Fujitsu directly to help
 12 you progress the issue --
 13 A. Yes.
 14 Q. -- had resulted in was a concerning observation by her
 15 that the data being provided by Fujitsu for use in court
 16 was not disclosing a full picture of transactions,
 17 correct?
 18 A. That's what she is saying, yes. She had some concerns
 19 about that.
 20 Q. In her email to you, she said she didn't know what to do
 21 about it.
 22 A. I took that to be about getting the change request
 23 sorted, so --
 24 Q. To get the change request to -- sorry to speak over to
 25 you -- to get more data?

42

1 that we've been provided with, in response to this.
 2 A. I don't think so, unless I had a conversation with
 3 Helen, but I don't remember. I have seen something else
 4 in the disclosure that I did -- I did initiate or put on
 5 an improvement list to get this change facilitated,
 6 although I'd forgotten about that --
 7 Q. To get what changed?
 8 A. The change of the ID to make it obvious that this wasn't
 9 a postmaster reversal; that it was a system generated
 10 reversal --
 11 Q. Because I'm talking about "We may be presenting
 12 incomplete and inaccurate evidence but by reason of its
 13 incompleteness to the court" issue.
 14 A. I didn't read that this way. As I say, if I'd had
 15 a conversation with Helen, and I don't remember, then
 16 I would have said -- because I expected her to take this
 17 through her reporting line because this was outside my
 18 area of knowledge. I've seen subsequent disclosure that
 19 she did do that and then she produced a report later,
 20 but that report -- I don't remember seeing at the time
 21 she did it and I've got no evidence that she sent it to
 22 me, although I have seen that I requested it at a later
 23 date because I became aware of it.
 24 So for me, my view on -- my take on what she was
 25 saying is, "I'm not sure really where to go with this

44

1 because -- and I'm happy to take you for a change
 2 request". That's what I took from this, not "I'm not
 3 really sure where to take this in terms of relation to
 4 the evidence", because that, clearly, would be through
 5 her reporting line, that's where she would automatically
 6 take that.

7 **Q.** Let's see what you say on your statement about this
 8 please, it's page 45, paragraph 94 onwards, and you say
 9 the document, and you give the character string, which
 10 is the email we've just been looking at:
 11 "... is an email to me on 13 February forwarding
 12 correspondence between her and Gareth Jenkins flagging
 13 concerns that Horizon based system corrections and
 14 adjustment transactions are not clear on Credence or ARQ
 15 logs, as shown with the Lepton logs."
 16 That's one of the issues, would you agree, that it
 17 raises?

18 **A.** Yes, it is one of the issues.

19 **Q.** The other issue is the presentation of evidence in court
 20 proceedings?

21 **A.** Yes. It's linked, obviously, yes.

22 **Q.** "I cannot recall my response. I have requested a copy
 23 of my response to Helen's email but the Post Office
 24 could not locate this which indicates that I did not
 25 reply to Helen via email. I may have had a conversation

45

1 Rose emails [let's restrict it to the emails for
 2 a moment] made me or anyone else at the Post Office
 3 concerned that past convictions may be unsafe. Whilst
 4 I cannot speak for anyone else personally I did not make
 5 any connection to the safety of past convictions from
 6 the emails from Helen Rose or the Helen Rose report.
 7 Whilst I realise this sounds naive, prosecutions were
 8 outside my area of responsibility and indeed my
 9 knowledge scope. I took no view on how they were put
 10 together, other than to be assured that they were all
 11 done on line with the Code for Crown Prosecutors",
 12 et cetera.

13 **A.** Yes.

14 **Q.** So when Helen Rose was raising with Mr Jenkins and then
 15 drawing to your attention the fact that basic ARQ logs
 16 are used for evidence in court and, therefore, in some
 17 circumstances we would not be giving a true picture to
 18 the court, that didn't ring any alarm bells?

19 **A.** Not for me at the time. As I said, I expected Helen to
 20 take that through her reporting line.

21 **Q.** You would have expected Helen to take that through her
 22 reporting line?

23 **A.** Yes.

24 **Q.** Even though she was drawing it to your attention?

25 **A.** Well, she was only drawing it to my attention because

47

1 with her to discuss the email but [you can't remember].
 2 "95. I did not share the report with it or brief
 3 others in senior management, Board, subpostmasters or
 4 MPs on the report. [You] cannot recall when [you] first
 5 became aware of the report. [You] have asked [the Post
 6 Office] for a copy of the covering email from Helen Rose
 7 to recipients of the report but they are unable to
 8 locate it. I seem to remember that it was brought to my
 9 attention by the Legal team as they were preparing for
 10 the Group Litigation Order."
 11 We're going to come to the Helen Rose report in
 12 a moment. You think you didn't see the Helen Rose
 13 report until preparation years later for the Group
 14 Litigation?

15 **A.** I didn't see the report from Helen at the time she wrote
 16 it, it was later, I can't remember when that was.
 17 I have seen some further disclosure, after I put this
 18 together, that I've asked somebody for a copy of the
 19 report and that would be, I think, in 2014, which will
 20 be earlier than going into the litigation, but
 21 I couldn't remember at what point I saw it.
 22 I definitely saw it but I couldn't remember when.

23 **Q.** Okay we'll come to that a little later:
 24 "The Inquiry have asked to what extent, if at all,
 25 did the matters concerning the ARQ raised in the Helen

46

1 I'd asked her to look into the Lepton case.
 2 **Q.** So is it one of those things, it's just somebody else's
 3 job, Ms van den Bogerd?

4 **A.** Well, it was outside my knowledge scope, as I said, so
 5 I wouldn't have had the knowledge to know what to do
 6 with that. Helen did raise it through her line and it
 7 was subsequently addressed that way. So, as I say,
 8 I don't remember if I had a conversation with her about
 9 it but she certainly did what I expected her to do, was
 10 go to her line route to make sure that she expressed her
 11 concerns there, and it was dealt with appropriately.

12 **Q.** Are you saying that you need a greater, as you call it,
 13 knowledge scope in order to realise that it's a serious
 14 issue to present incomplete and, therefore, inaccurate
 15 information to a court?

16 **A.** So, this is the first time I started getting involved in
 17 this. I wasn't -- didn't have the broader view or the
 18 broader knowledge and now I would obviously look at this
 19 very, very differently, but Helen was used to doing
 20 this. It was Helen's expertise and she was there to
 21 take that through her reporting line.

22 **Q.** But you were handling the Lepton issue?

23 **A.** I was trying to get to understand what had gone on with
 24 the Lepton issue, yes, and provide that information to
 25 Ron in Second Sight.

48

1 Q. Did you pass on to Mr Warmington of Second Sight the
 2 fact that the Post Office may be presenting incomplete
 3 and therefore inaccurate ARQ data courts?
 4 A. I don't believe I shared that email chain with Ron.
 5 Q. Or the information in the email chain?
 6 A. I don't believe I did. I had numerous conversations
 7 with Ron on this particular case, trying to understand
 8 what had gone on there but I wouldn't have discussed the
 9 other email chain between Gareth and Helen with him.
 10 MR BEER: Thank you.
 11 Sir, could we take our morning break please until
 12 11.10.
 13 SIR WYN WILLIAMS: Yes, certainly.
 14 (10.58 am)
 15 (A short break)
 16 (11.10 am)
 17 SIR WYN WILLIAMS: Well, one advantage of being here,
 18 Mr Beer, is that I can start without the latecomers.
 19 MR BEER: Yes.
 20 Ms van den Bogerd, can we move to later in the year
 21 2013 to see what happened further in relation to the
 22 issue that Helen Rose had been asked to investigate,
 23 arising from the problem at the Lepton Branch, and look
 24 at POL00146928, and go to page 3, please, and scroll
 25 down. This chain starts with an email of 19 November
 49

1 its own reversals) the, ID of the staff member who input
 2 the transaction that it (the system) is then reversing.
 3 My position on that is that the design is incorrect and
 4 that such auto reversals should always have had attached
 5 to them an ID naming Horizon itself, not asserting that
 6 the person who keyed the (about to be reversed)
 7 transaction -- and who may not even know that his or her
 8 transaction is about to be reversed -- also processed
 9 the reversal. It also seems that in many cases not only
 10 did the originator not know that one of his or her
 11 transactions was being reversed but also never found out
 12 about that reversal at any later time either."
 13 So what, would you agree, that Mr Warmington is
 14 doing here is raising the Lepton Branch issue in the
 15 context of the investigation of Lee Castleton's case.
 16 A. Yes, he's making a link there and asking -- and letting
 17 Shirley know that.
 18 Q. He's pointing out that it might have occurred at Lee
 19 Castleton's branch too. The ARQ data showed
 20 transactions next to a branch user ID but the people at
 21 the branch were certain they hadn't performed the
 22 transactions, is what Mr Castleton was saying.
 23 At Lepton, it appeared, on the face of it, as if
 24 this was a branch transaction, that's what the system
 25 showed, rather than a system-generated reversal, so he
 51

1 2013 from Ron Warmington to Shirley Hailstones. I think
 2 she was a Case Manager; is that right?
 3 A. Case Review Manager, yes.
 4 Q. Sorry, Case Review Manager, you're quite right, on the
 5 Post Office side --
 6 A. Yes.
 7 Q. -- of the Mediation Scheme; is that right?
 8 A. That's right, she was part of my team, yes.
 9 Q. How many Case Review Managers were there?
 10 A. Two, so she was the North and there was one in the
 11 South.
 12 Q. Mr Warmington has copied in Lee Castleton, his partner
 13 in business Ian Henderson -- that's Mr Warmington's
 14 partner in business, Mr Henderson -- and Alan Bates and
 15 says to Ms Hailstones:
 16 "Shirley:
 17 "Am looking at Lee's source documents now [Lee
 18 Castleton]. Will scan and send you those that you've
 19 asked for. In the meantime, here's spot review 18,
 20 I will also locate -- in Lee's documents which I have
 21 here -- the pages that relate to the transactions that
 22 Lee claims were entered at times when neither Lee nor
 23 his staff were logged in. My thoughts turn to
 24 auto-generated reversals as a possibility here. As
 25 we've already established, Horizon allocates (to each of
 50

1 was saying that it was possible that the disputed
 2 transactions at Marine Drive were themselves automated,
 3 despite the user ID of a branch user being shown next to
 4 them. That's the point he's making, isn't it?
 5 A. Yes.
 6 Q. So the Lepton issue is being raised again in
 7 Mr Castleton's case, yes?
 8 A. Yes.
 9 Q. Then, if we scroll up, please, there is some information
 10 that's irrelevant and then if we go to page 2, please,
 11 Ms Hailstones replies directly to Mr Warmington, cutting
 12 out Lee Castleton, Ian Henderson and Alan Bates from the
 13 chain:
 14 "Can you please provide the transaction logs
 15 applicable to the transaction ... or more detail."
 16 Then up, please. He, Mr Warmington, says:
 17 "I don't think I've been given these Shirley but
 18 will take a fresh look. Lee: if you tells have those,
 19 please get them to us.
 20 "Shirley: at this stage of the process, I think you
 21 should routinely copy (as I did, and have again here)
 22 the applicant and his chosen professional adviser (Emma
 23 [Porter]) on correspondence."
 24 So he, Mr Warmington, was saying that correspondence
 25 of this nature should be copied in to the applicant of
 52

1 the scheme, yes --
 2 **A.** That's what he was suggesting, yes.
 3 **Q.** -- rather than being excluded?
 4 **A.** That's what he's suggesting in terms of direct copy,
 5 yes.
 6 **Q.** Bottom of page 1, please. Shirley Hailstones forwards
 7 that chain to you. Then up the page, please, you
 8 forward it to the lawyer, Andrew Parsons, and the
 9 lawyer, Rodric Williams, asking or saying you'd be:
 10 "... interested in your views on Ron's approach
 11 here, ie copying the email correspondence to the
 12 applicant, their adviser and Alan Bates. Shirley is
 13 investigating [that case] and has legitimately asked Ron
 14 for what more information he may have. This interaction
 15 should, in my view, not be widely circulated -- I'd
 16 appreciate your thoughts."
 17 So it had been pushed up the chain to you, the fact
 18 that Mr Castleton should be kept out of the loop. You
 19 agreed with that, didn't you?
 20 **A.** So this was a point of process. So what we'd agreed
 21 when we started the scheme is that Ron and Ian, Second
 22 Sight, sorry, would be the liaison directly with the
 23 applicants and their advisers, and then link into us.
 24 It was never -- it's not about keeping them out of the
 25 loop; it was just who was meant to be sharing that

53

1 **Q.** Was it that you wanted the Post Office to appear
 2 helpful, whilst actually preventing the subpostmasters
 3 from gaining access to information in the course of the
 4 investigation of the case?
 5 **A.** Not at all, because the access they had was to Second
 6 Sight, who had all the information.
 7 **Q.** So there wouldn't have been a proposal with Second Sight
 8 forwarding this email?
 9 **A.** No.
 10 **Q.** It was just the fact they were copied in --
 11 **A.** Yes, it was just the process --
 12 **Q.** -- to the chain?
 13 **A.** It was just a process point.
 14 **Q.** You wanted to erect information barriers, didn't you, to
 15 prevent the subpostmasters from finding out the truth
 16 from Second Sight, didn't you?
 17 **A.** No. Second Sight had the -- they had, you know, the
 18 ability to liaise directly with them and get the
 19 information flow directly, so it was nothing about
 20 stopping information at all; it was just purely
 21 a process point about who should be doing that.
 22 **Q.** Can we move on, please, to 2014. POL00029709. And
 23 start with page 2, please. If we go to the foot of the
 24 page, please. There's an email from Mr Darlington --
 25 who is a member of Howe+Co solicitors, yes --

55

1 information at what point. Now, we'd had feedback from
 2 JFSA in the process to say that they didn't want direct
 3 contact with the applicants from Post Office because it
 4 triggered -- it just brought back bad memories and, even
 5 later in the scheme, they asked us to remove the Post
 6 Office logo from any correspondence that they sent, so
 7 it would just be Mediation Scheme kind of logo.
 8 So this was simply a process point around what's the
 9 appropriate way that we should be engaging with Second
 10 Sight, and my view was that --
 11 **Q.** So, to summarise, you're saying that you had the
 12 wellbeing and health of subpostmasters at the forefront
 13 of your mind because, to be copied in on correspondence
 14 with the Post Office, might trigger them? That's what
 15 you were thinking, was it?
 16 **A.** That was part of it. The other part of it is that the
 17 communication back to the applicant should have been
 18 done -- should have only been when the case had been
 19 investigated, so they'd get a Post Office investigation
 20 report and then they'd get the case review report from
 21 Second Sight. So the process was that they shouldn't,
 22 from Post Office's perspective, be included in all new
 23 correspondence in between, because of that was just part
 24 of the investigation, but it was for Second Sight to
 25 liaise directly with the applicant and the advisers.

54

1 **A.** Yes.
 2 **Q.** -- emailing Mr Warmington and then a general "Post
 3 Office Group" email. Do you know what that was, on the
 4 copy list?
 5 **A.** No.
 6 **Q.** He says:
 7 "Dear Ron,
 8 "As Priti has stated in her last sentence we are
 9 seeking a stay on the time limits on all cases under
 10 review due to the implications of [the Post Office's]
 11 non-disclosure of system-generated transactions and
 12 Horizon's integrity issues.
 13 "The 'Helen Rose Report' is of critical significance
 14 to all cases. The information contained within it is
 15 a compelling case for such a stay on its own right.
 16 When combined with the Andy Winn-Alan Lusher email in
 17 the case of Ward, which explicitly states that Fujitsu
 18 can remotely change the figures in the branch without
 19 the postmaster's knowledge or authority, the case for
 20 a general stay is overwhelming."
 21 So here this email is bringing together two strands
 22 isn't it: one that we looked at yesterday, the
 23 Winn-Lusher email about remote access --
 24 **A.** Yes.
 25 **Q.** -- and, secondly, the issues raised in the Helen Rose

56

1 Report.

2 Then if we scroll up, please. We can go past that

3 email on to page 1. Ms Crowe sends that on to you in

4 April about postponement of the Working Group but asked:

5 "... does anyone know anything about the email being

6 quoted below about remote alteration of figures in

7 branch [that's the Winn-Lusher email]? I think that's

8 a new one on me.

9 "Can we chase [Cartwright King] for a response on

10 the Rose Report point?"

11 Then further up. You reply to her, you attach

12 an email chain, I think that's the Winn-Lusher email

13 chain; is that right?

14 A. Yes, at -- that would be right.

15 Q. "In terms of transaction corrections/acknowledgements

16 [that's the Helen Rose issue] we've explained these in

17 the fact file so it should be clear that these need the

18 branch to accept the TC/TA on the Horizon system as it

19 doesn't automatically make any adjustments."

20 What did you mean by that?

21 A. Um ... in terms of the transaction corrections and

22 transaction acknowledgement, how they operated, is what

23 I've called up there.

24 Q. So you're saying on the transaction/acknowledgements

25 issue, that's the Helen Rose Report issue, "We've

57

1 up -- sorry just scroll down -- Belinda picked that up

2 directly and said, "Where are we with that?"

3 Q. Okay, and why was that Belinda's responsibility?

4 A. So Belinda was part of the Project Sparrow team and, as

5 I said yesterday, we didn't have defined roles, we had

6 never defined each person's role within what we were

7 doing but mine was predominantly the cases and the

8 investigation and the rest of the team, you know, and

9 the Legal Team and Belinda tended to facilitate a number

10 of those requests and keep an overview on what was going

11 on.

12 Q. I've already asked you about the remote access issues

13 yesterday, so I'm not going to go back on those again.

14 A. Okay.

15 Q. Last question on the Lepton Branch issue: were you

16 involved in any discussions or decisions about the

17 extent to which it should be disclosed to convicted

18 defendants?

19 A. No.

20 Q. Were you involved in any discussions or decisions on the

21 extent to which it should be disclosed in ongoing

22 prosecutions?

23 A. No.

24 Q. Were you involved in any discussions or decisions on the

25 extent to which it should be disclosed to the CCRC?

59

1 explained these in the fact file"?

2 A. So the transaction correction/transaction

3 acknowledgement wasn't anything to do with the Helen

4 Rose or Lepton scenario.

5 Q. That's a separate issue again, is it?

6 A. Yes.

7 Q. Okay, my mistake. What happened, then, in relation to

8 the issue that Howe+Co were raising concerning the Helen

9 Rose report?

10 A. So Belinda picked that up and said, "Where are we with

11 Cartwright King on that one?" What I was bringing to

12 the attention of everybody here was that this was the

13 issue around the Winn and Lusher -- I think it was Alan

14 Lusher, that's the bit that he's referring to there.

15 Q. So there's three things going on, then, here: one is the

16 Winn-Lusher email, one is the TC/TA issue --

17 A. Yes.

18 Q. -- and the third is the issue raised or addressed in the

19 Helen Rose Report concerning the Lepton Branch?

20 A. Yes.

21 Q. What happened to the question or the assertion made in

22 Mr Darlington's email that the Helen Rose report is of

23 critical significance to all cases, what did you do as

24 a result of that?

25 A. So I didn't do anything with that, Belinda picked that

58

1 A. No, that was all done by the Legal Team.

2 Q. Thank you. That can come down. Thank you.

3 Can I turn to my third topic, then, which is setting

4 up the Mediation Scheme proper. You tell us in your

5 witness statement that you were a member of the Working

6 Group of the Initial Complaint Review and Mediation

7 Scheme; is that right?

8 A. Yes, correct.

9 Q. You tell us, I think, about your role in paragraph 114

10 of your witness statement, which we should turn up.

11 It's on page 60.

12 You say that:

13 "[Your] role within the scheme and the Working Group

14 was to, on behalf of POL, lead the team of Case Review

15 Advisers/Investigators who would be carrying out the

16 investigation and drafting of the POIR."

17 Is that the Post Office's Investigation Report --

18 A. It is, yes.

19 Q. -- ie it's the response to what Second Sight produced?

20 A. It's the response to the issues that came in from the

21 applicant.

22 Q. I see, before Second Sight had produced the first draft?

23 A. Yes, so we produced the Post Office Investigation

24 Report, passed that to Second Sight, they reviewed that

25 with all the evidence and whatever other enquiries they

60

1 undertook, and then they produced their Case Review
 2 Report. And both --
 3 **Q.** You had a North and South team, as you've told us
 4 already:
 5 "... (with 10 Case Review Advisers/Investigators in
 6 each), each led by a manager ..."
 7 We've seen the name of one of those two managers for
 8 the North area:
 9 "The managers sent each draft case investigation
 10 report for my review and my review involved ensuring
 11 that each of the issues had been investigated, their
 12 findings explained (in an easy to understand language)
 13 and that the findings were supported by evidence. My
 14 involvement in the scheme was prompted by my involvement
 15 in the Ferndown interview but I wanted to take on this
 16 role as I had a genuine desire to understand if there
 17 was any substance in the complaints."
 18 What motivated your genuine desire to understand if
 19 there was substance in the complaints?
 20 **A.** Well, as we discussed yesterday, I'd had some rumblings
 21 over the years and, given that Horizon, essentially, was
 22 the backbone in terms of how we operated in our network.
 23 I wanted to understand if there was anything in the
 24 claims that it was Horizon that was generating the
 25 discrepancies.

61

1 understanding if there was anything in the issues and
 2 the complaints that were being raised at the time. So
 3 it was a genuine attempt to investigate those claims and
 4 to see what the outputs of that were.
 5 **Q.** So it was always and throughout a genuine attempt to get
 6 to the truth and pay whatever compensation was due,
 7 whether that was a small amount or a large amount?
 8 **A.** So it was always my intention to get to the truth. The
 9 compensation element was separate from my consideration
 10 at the time.
 11 **Q.** Was it always, to your knowledge, Post Office's
 12 intention to get to the truth?
 13 **A.** Yes.
 14 **Q.** Can we turn, please, to POL00100336. Thank you.
 15 On 24 February 2014 -- this is -- a meeting took
 16 place between Paula Vennells, Chris Aujard, Ron
 17 Warmington and Ian Henderson; so the two directors of
 18 Second Sight, the CEO and interim General Counsel. This
 19 is Mr Aujard's minute of it. We can see that from the
 20 second page, his name at the end of it. If we just go
 21 back to page 1, please:
 22 "The meeting was held at Paula Vennells's request in
 23 order to discuss the progress of the Mediation Scheme
 24 with Second Sight. Paula Vennells explained that there
 25 were a number of areas she wanted to discuss, including

63

1 **Q.** Was it your view from the start of the Mediation Scheme,
 2 the formal Mediation Scheme, that the idea was to, at
 3 best, placate some subpostmasters with token payments
 4 and apologies?
 5 **A.** So it -- when we went into the -- when I started getting
 6 involved, it was about getting to the truth, in terms of
 7 what had happened in the branches. There was
 8 an expectation, I think, within Post Office, that we
 9 weren't massively exposed in terms of compensation
 10 payments, and I've seen some advice around what that
 11 would look like, if we did need to compensate, which
 12 was, I think, in the range of three months' notice in
 13 terms of the remuneration, the contract. But there was
 14 never a massive -- there was never an expectation that
 15 there would be huge liability in terms of compensation,
 16 yes.
 17 **Q.** That's the answer to a different set of questions, which
 18 would have been what: legal advice did you receive as to
 19 the extent of the liability exposure of Post Office?
 20 The question I asked was: was it the plan from the
 21 beginning of the Mediation Scheme, on Post Office's
 22 part, to only offer token payments and apologies?
 23 **A.** No. So it would have depended the findings of the
 24 reports, so in terms of the investigation. So it was
 25 never the -- the intention was always about

62

1 the letter of engagement, the pressure from ShEx, [the
 2 Shareholder Executive], the Board and timescales.
 3 Overall, the meeting was friendly with what appeared to
 4 be real engagement by Second Sight.
 5 "It was noted by [Paula Vennells] that the projected
 6 level of claims was currently around £100 [I think
 7 that's supposed to be million] in response to which
 8 Second Sight noted that their back of the envelope
 9 calculation was of the order of £25 to £50 million.
 10 [Paula Vennells] observed that this was a long way from
 11 the figures that were in mind when the scheme was
 12 established, which were much smaller, and much more of
 13 the nature of a 'token' with an apology. It was the
 14 case that neither the Board nor the Shareholder
 15 Executive would countenance the payment of large scale
 16 amounts by way of compensation."
 17 So I'll ask you again: did you know at the
 18 beginning, at the establishment of the scheme, that the
 19 plan was to make payments which were more of the nature
 20 of a token with an apology?
 21 **A.** So if I go back to the start, so my involvement at the
 22 start was before the scheme. So when I got involved,
 23 and this was about getting to the truth and
 24 understanding it was the initial inquiry, which is the
 25 spot review approach, and my early conversations were

64

1 with -- were part of the broader conversation with
 2 Alice, Paula, Susan and a few others, and it was -- we
 3 weren't talking about compensation at that point; it was
 4 about getting to the truth of the claims.

5 This, as I covered off earlier, came in later into
 6 the equation. I wasn't aware of this note until this
 7 morning but there was always a sense -- and I don't know
 8 at what point -- there was a sense that this wouldn't be
 9 a massive compensation liability for Post Office; it
 10 would be further -- a lot less money than clearly what
 11 was talked about here.

12 But I wasn't party to those conversations; it was
 13 just that's what was relayed to me.

14 **Q.** You were the or one of the main leaders on the Post
 15 Office side of the Mediation Scheme, weren't you?

16 **A.** Yes, in the Working Group, yes.

17 **Q.** Were you the most senior of the Post Office
 18 representatives on the Post Office side of the Working
 19 Group?

20 **A.** No, that would be General Counsel.

21 **Q.** Were you the next most senior?

22 **A.** So it was General Counsel, it was myself, Belinda would
 23 have been there as a Secretariat role, and then we had
 24 Andrew Parsons as -- yes, so I would have been the only
 25 other Post Office person, consistently throughout that

65

1 could we possibly have an outcome in mind? That was my
 2 understanding and my involvement. Now, as I said, as it
 3 went through, it became quite obvious within Post Office
 4 that we didn't expect the compensation levels to be
 5 large, and I don't remember the date that that happened.

6 Clearly, by this point, Paula's concerned about it
 7 but, as I say, I wasn't party to all of those
 8 conversations.

9 **SIR WYN WILLIAMS:** When do you say the start was in terms of
 10 formulating the scheme?

11 **A.** So the scheme would have been formulated, I think we
 12 opened up for applications in August 2013.

13 **SIR WYN WILLIAMS:** Yes.

14 **A.** Prior to that we'd been doing the spot reviews. So
 15 that's --

16 **SIR WYN WILLIAMS:** Were they related to the Interim Report
 17 rather than the scheme?

18 **A.** Yes.

19 **SIR WYN WILLIAMS:** So, just in general terms, the scheme
 20 came after the Interim Report?

21 **A.** Yes.

22 **SIR WYN WILLIAMS:** Right. So at the start, the summer of
 23 2013, and this note is February 2014. So within five or
 24 six months of the start, clearly this was the view of
 25 Ms Vennells, wasn't it?

67

1 process.

2 **Q.** You adopted a leading role in the Mediation Scheme on
 3 behalf of Post Office, didn't you?

4 **A.** In terms of the investigations, yes.

5 **Q.** And in engagement in the Working Group?

6 **A.** And in the engagement of the Working Group, I did, yes.

7 **Q.** Were you not told that Post Office's idea of what the
 8 scheme should be, how it should end up, was that small
 9 payments, more in the nature of token payments, should
 10 be the outcome, along with apologies?

11 **A.** I don't think so at the start because --

12 **Q.** So how has it happened that the Chief Executive is
 13 disclosing in this private meeting here of what the plan
 14 was and you didn't know about it?

15 **A.** So I think at the start, then -- as I said yesterday,
 16 the scheme wasn't designed entirely when we started it.
 17 It was designed through the Working Group. So my --
 18 I didn't have an awareness of what we expected at the
 19 start that compensation levels to be.

20 **Q.** So all bets were off, it was an open field?

21 **A.** From my --

22 **Q.** The payments could be small, large or gigantic?

23 **A.** So, from my understanding, we were generally entering
 24 into this with we need to get to the truth and,
 25 therefore, if we didn't know what the truth was, how

66

1 **A.** Yes, because at this point --

2 **SIR WYN WILLIAMS:** You didn't know anything between the
 3 start and this point in time that that was her view?
 4 That seems to be what you're telling me?

5 **A.** So what I'm saying is that, at the start, we didn't
 6 have -- part of the application process was that the
 7 applicant would actually say what they expected their
 8 claim to be and that's what obviously would have been
 9 driving the £100 million that I think that Paula is
 10 quoting there. At the start, we didn't have any
 11 knowledge of what that would be it would have just been
 12 what people guessed it might be and, clearly, Post
 13 Office was in a very different place to where the
 14 applicants were.

15 **SIR WYN WILLIAMS:** So, in summary, once it became clear by
 16 the submission of applications --

17 **A.** Yes.

18 **SIR WYN WILLIAMS:** -- that some people were looking for very
 19 large sums of money --

20 **A.** Yes.

21 **SIR WYN WILLIAMS:** -- it became the view of the Post Office
 22 that that was never going to happen, in truth?

23 **A.** Yes, that's what they didn't expect to happen, yes.

24 **MR BEER:** Was that said openly to subpostmasters?

25 **A.** No.

68

- 1 **Q.** Was the mediation process instead presented to
2 subpostmasters as a means by which they could achieve
3 compensation for the way in which their contracts were
4 terminated and for losses that arose from contract
5 termination and that compensation was at large?
- 6 **A.** I don't think it was set out in those terms and I can't
7 remember how we -- what the communication was now, which
8 would have been in the application process itself. But
9 it was set out as a way of understanding the issues and
10 to see whether we could achieve closure. I think there
11 was a difference of -- clearly a difference of opinion
12 on what closure looked like for Post Office and what
13 that looked like for the applicants to the scheme.
- 14 **Q.** Was this plan or belief by the Post Office, that the
15 scheme in operation would only deliver, at best,
16 smaller, token payments with apologies, ever revealed to
17 Sir Anthony Hooper?
- 18 **A.** I don't know. It certainly wasn't revealed through the
19 Working Group meetings. If it -- if he'd had private
20 conversations outside of that, I wasn't aware at the
21 time.
- 22 **Q.** If Post Office's private view as to the nature of the
23 scheme, as expressed here, was revealed neither to
24 subpostmasters nor Sir Anthony Hooper, would you agree
25 that the Post Office acted in bad faith during the

69

- 1 that there was nothing wrong with the Horizon system and
2 that their contracts had been properly terminated?
- 3 **A.** That was never my understanding and, had it been that,
4 I wouldn't have -- I wouldn't have volunteered to have
5 got involved.
- 6 **Q.** But was there a document or a written record of the Post
7 Office's intentions or plans at the outset of the scheme
8 for its operation, ie its tactics?
- 9 **A.** Sorry, are you talking about the actual scheme?
- 10 **Q.** Yes, the Mediation Scheme?
- 11 **A.** Because my involvement was from the start and, from my
12 understanding, from recollection, is what happened is
13 that we had the Interim Report, so we'd had a year of
14 Second Sight investigating into the spot reviews. We
15 had the Interim Report that I think came out on 8 July
16 2013 and, in response to that, which is subject to
17 a Board meeting or some kind of meeting, out of that was
18 born the scheme.
- 19 And I don't recall a particular document, although
20 there would have been some discussion in that meeting
21 around what that should look like. But I can't remember
22 if it was -- I don't recall it being articulated around
23 "We expect it to be this", although I have seen some
24 correspondence around expectations, although I can't
25 remember where from.

71

- 1 Mediation Scheme?
- 2 **A.** I think the Post Office view changed throughout that
3 scheme. I think at the start it was genuine and I think
4 when it was obvious where the claim level was from the
5 applicants, that Post Office view changed.
- 6 **Q.** When that view changed, as you would have it, we see
7 that Ms Vennells said that that was the view from when
8 the scheme was established. But, even if the view
9 changed, as you've told us, was that revealed, to your
10 knowledge?
- 11 **A.** No.
- 12 **Q.** Do you accept from then on the Post Office was
13 maintaining a charade?
- 14 **A.** Well, I think, you know, we still genuinely wanted to go
15 into the Mediation Scheme to try to get some closure on
16 those cases and some cases did get closure thorough
17 that, but there was clearly -- and this was evident from
18 the Working Group and the conversations in there -- that
19 there was this -- there was a big gap there. So I don't
20 think I'd say a charade but, actually, there was a gap
21 in expectation that was quite obvious.
- 22 **Q.** Was it, instead, always the case, right from the
23 beginning, that, from the Post Office's perspective, the
24 purpose of the Mediation Scheme was for the Post Office
25 to put its own position to subpostmasters, to tell them

70

- 1 **Q.** Can we move, please, to POL00199572 and, if we go to the
2 second page, please, and just look at the bottom of the
3 first page so we can see -- thank you -- an email from
4 Mr Bates to Ms Vennells, around the same time, so, in
5 fact, the month before, headed "Concerns":
- 6 "I am quite concerned about what I have been hearing
7 recently about the Post Office trying to change the
8 scope of the scheme in order to restrict the terms of
9 the investigation and stop certain matters being
10 discussed. I should make it clear that the JFSA signed
11 up to the details as were discussed and documented last
12 July/August and alterations to what was agreed will
13 result in JFSA withdrawing from the Working Group and
14 the Scheme. I do not know if you are aware of what is
15 being proposed by the new [Post Office] members of the
16 Working Group, but from what I can glean it seems as if
17 [the Post Office] are trying to hijack the process which
18 is something your Minister assured me would not happen
19 in her letter to me last September.
- 20 "I would be grateful if you would look into what is
21 happening at present. The impression I am getting seems
22 to be very different to the discussions we had last
23 year."
- 24 Then up, please. That's forwarded to Martin and
25 Belinda, copied to you, advising on a response.

72

1 Then further up the page, please. We can see that
 2 Sophie, the Public Affairs Manager -- and just help us
 3 with Sophie. The Public Affairs Manager, is that in
 4 Media and Communications or --

5 **A.** Yes, yes.

6 **Q.** -- is it something different. Okay, so Media and
 7 Communications?

8 **A.** So Sophie was involved initially and then I think
 9 Melanie Corfield came in after, instead of Sophie.

10 **Q.** Was Mr Bates right: by January 2014, was the Post Office
 11 trying to hijack the mediation process?

12 **A.** So I think it had changed. So, again, Alan would be
 13 going back to the start, where we had brought Second
 14 Sight in, and when we went from the inquiry, which was
 15 a spot review element of it, into the scheme, then it
 16 was a much more narrow focus on and it was to do with
 17 the applicants' issues at a branch level, whereas
 18 initially Second Sight was looking a bit more
 19 holistically around the issues.

20 **Q.** Was Mr Bates right that the Post Office was trying to
 21 stop matters from being discussed?

22 **A.** In terms of, you know, the different elements of it,
 23 then it had definitely changed -- in terms of the scope,
 24 had changed from initially, at the start, in 2012 to
 25 where we were when we went into the scheme. So this

73

1 150, that ended up being 136, and that's the focus.
 2 Where I think Second Sight, from Chris' perspective,
 3 were drifting outside the branch issues.

4 **Q.** Can we move on, please, POL00200717. This is a slide
 5 deck, dated, as we can see, 13 February 2014, about the
 6 Initial Complaint Review and Mediation Scheme, and it's
 7 an update for ExCo, so is that the Executive Team within
 8 the Post Office?

9 **A.** Executive Committee, yes.

10 **Q.** I'm sorry, Executive Committee. Just help us, I think
 11 we've heard about a Board and then, underneath it,
 12 an Executive Team. What was the Executive Committee?

13 **A.** I think it's the same thing, actually. The name changed
 14 several times. I would take that to be the Executive
 15 Directors level that reported in to Paula and then Paula
 16 reported in to Board.

17 **Q.** So who would be on it?

18 **A.** No.

19 **Q.** No, who would be on it?

20 **A.** Oh, who would be on it, sorry. It would be all Paula's
 21 direct reports, so -- I'm sorry, I'm probably going to
 22 get this -- in terms of the job roles, there would have
 23 been the CFO, there would have been the Chief Operating
 24 Officer, there would have been the CIO, Finance
 25 Director, the HR Director, so it was that broad level --

75

1 would have been -- so the scheme opened in August, it
 2 closed in November 2013 for applicants and this would
 3 have been a couple of months afterwards. So from Alan's
 4 perspective, he clearly felt that there was
 5 a significant change. We'd had a change of membership.
 6 He refers to the change of membership in the group.

7 **Q.** Was that Chris Aujard coming on board?

8 **A.** So Susan would have left, as she said this week, and I
 9 forget exactly what date she said she left, but Chris
 10 Aujard came in as her replacement.

11 **Q.** September 2013 onwards. Was there a hardening of the
 12 Post Office's position from Mr Aujard's arrival.

13 **A.** I think so.

14 **Q.** In what respect was that hardening of the Post Office
 15 position manifesting itself?

16 **A.** Sorry, more focused on the specific cases and getting
 17 the investigations concluded in the individual level in
 18 a reasonable timeline, whereas, prior to the scheme, we
 19 had very little output from those investigations and the
 20 timeline drifted. So it was about the focus on getting
 21 those -- the timeline.

22 **Q.** When you say more focused on individual investigations,
 23 do you mean less focused on systemic issues?

24 **A.** I don't think so. It think it was more around we had
 25 the -- the applicants had come into the scheme, we had

74

1 comms Director.

2 **Q.** Can we go to the next page, please. There is an agenda
 3 for a meeting; can you see that?

4 **A.** Yes.

5 **Q.** Over the page, please. It records that the programme,
 6 that's the Mediation Scheme, is at a critical juncture
 7 with large potential financial exposure with a very
 8 large expectation gap:
 9 "Post Office has no hard power and minimal influence
 10 and [is] paying the bills."
 11 What was "hard power"?

12 **A.** I presume control, from this.

13 **Q.** Was that something that the Post Office wanted, hard
 14 power?

15 **A.** Not that I was aware of at the start.

16 **Q.** Were you responsible or did you contribute to this slide
 17 deck?

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

19 **Q.** You were still, at this time, one of the senior leaders
 20 within the Post Office, responsible for the Mediation
 21 Scheme, weren't you?

22 **A.** In terms of the investigations, yes.

23 **Q.** Well, and in terms of sitting on the Working Group, yes?

24 **A.** Yes, in terms of the Working Group, as well, yes.

25 **Q.** Was it your view that the Post Office had no hard power

76

1 in the Mediation Scheme?
 2 **A.** No. We never -- I mean, when we set it up, it was never
 3 intended that we would have hard power or control
 4 anyway. I mean, we had an independent process running
 5 and that's --
 6 **Q.** This seems to be written as a complaint, doesn't it, "we
 7 have no hard power, we've got minimal influence over the
 8 way this thing is going, and yet we're having to pay for
 9 it"?
 10 **A.** That was always the way it was set up. That was the
 11 agreement from the start. It would be independent, we
 12 would be footing the bill but we would have no influence
 13 over the independent forensic accountants firm that we
 14 brought in. That's how it was set up.
 15 **Q.** Did you ever gain any information that the ExCo or the
 16 Board expected Post Office to have hard power and proper
 17 influence on the Mediation Scheme?
 18 **A.** I didn't at the time. I've since seen things disclosed
 19 and listened to evidence from other people but I didn't
 20 at the time.
 21 **Q.** It continues in the next bullet point:
 22 "Hostile stakeholders including those directly
 23 engaged by Post Office."
 24 In the Mediation Scheme, who were the "hostile
 25 stakeholders" directly engaged by the Post Office?

77

1 here and, therefore, we ought to be able to dictate the
 2 results"?
 3 **A.** Not at all. That was -- as I said earlier, that's not
 4 why I got involved.
 5 **Q.** Susan Crichton dropped the ball by getting people who
 6 were too independent in?
 7 **A.** Susan Crichton did her job by getting people who were
 8 independent. That was the whole point of the --
 9 **Q.** And was forced out of the business.
 10 **A.** Yes, but what I'm saying is Susan -- when we had the
 11 early conversations about what we were trying to do, we
 12 wanted it to be independent and that's why we went down
 13 the route of Second Sight and they were doing their job.
 14 **Q.** The next bullet point:
 15 "The Working Group was asserting itself and seeking
 16 to re-engineer [its] scope", or the scope of the scheme,
 17 presumably.
 18 Is that accurate too?
 19 **A.** The Working Group, we were looking to get more focus on
 20 putting applications through the process. So we did
 21 become more focused around timelines and that was it,
 22 really. I mean, the Working Group -- I mean, it was
 23 a developing way of working from the start and, when
 24 Sir Anthony Hooper joined, which was about a month
 25 after, I think, in October, that's when we started to

79

1 **A.** Well, from this, it can only be Second Sight because we
 2 didn't engage any other stakeholders.
 3 **Q.** Were they hostile?
 4 **A.** Not to my working knowledge. They were challenging.
 5 **Q.** They were independent?
 6 **A.** Exactly, which I expected them to be. They were
 7 independent and, therefore, they were challenging and
 8 they were looking at things through a different lens to
 9 what Post Office had traditionally looked at.
 10 **Q.** So how has it happened that the third bullet point has
 11 been constructed to represent ExCo for this meeting and
 12 it doesn't represent what you believe to be the case,
 13 and the fourth bullet point too is saying that hostile
 14 stakeholders are Second Sight -- or Second Sight are
 15 hostile stakeholders, and you didn't believe that to be
 16 the case either?
 17 **A.** That wasn't my view. Sorry, who authored this?
 18 **Q.** That's what we're trying to discover. That's why I ask
 19 you.
 20 **A.** Okay, because it's not language I would use.
 21 **Q.** Are you trying to distance yourself from this, whereas
 22 in fact this was your view? You were rather resenting
 23 the fact that Second Sight were independent.
 24 **A.** No, I wasn't, actually.
 25 **Q.** You thought "We're Post Office, we're paying the bills

80

1 get the focus and get some shape to getting the outputs
 2 from the applications.
 3 **Q.** The author of this document is telling the ExCo that the
 4 process design was being driven by vested interests; was
 5 that your view?
 6 **A.** It depends what they meant by "vested interests". The
 7 vested interests from my understanding was we all wanted
 8 to get the investigations into the issues done as
 9 quickly as we could. That took longer than we all
 10 expected because they were very complex issues and we
 11 didn't have all the information readily available to us.
 12 So that, I think, was the vested interest, is getting to
 13 the production of the reports, the conclusions and then
 14 on to the next stage, which would have been the
 15 mediation.
 16 **Q.** If a person wished to brief the ExCo about the current
 17 operation of the Mediation Scheme in mid-February 2014,
 18 you would be the obvious person to turn to for
 19 information; do you agree?
 20 **A.** For information on the scheme progress, in terms of the
 21 applications, then yes.
 22 **Q.** And the way it was working?
 23 **A.** But this isn't -- this isn't the language I would have
 24 used.
 25 **Q.** That's a different question, Ms van den Bogerd. That

80

1 would be: is this language that you would use? Then
 2 you'd reply to me "That's not language I would use".
 3 I'm asking you a different question, which is: whether,
 4 in mid-February 2014, a person wishing to brief ExCo
 5 about the operation of the scheme, would naturally turn
 6 to you?
 7 **A.** I would have expected that to happen, but the content
 8 and the language here isn't my feedback. So I don't --
 9 **Q.** Did somebody turn to you in mid-February '14 to ask you
 10 "How is the scheme working?"
 11 **A.** Not that I can remember specifically. I would have been
 12 given updates on the scheme, if I'd been asked to go
 13 into meetings to do that, and I would also have been
 14 given updates on the Branch Support Programme that was
 15 running in parallel when I set that up as well, which
 16 would have been -- I think from memory, that would have
 17 been August -- it would have been just after the Interim
 18 Report, August 2013, so the main focus of my updating
 19 was around the Branch Support Programme but I would have
 20 been consulted, I should have been consulted on how the
 21 scheme was operated from a case perspective.
 22 **Q.** If ExCo was to be briefed on the operation of the scheme
 23 in mid-February '14, whoever was briefing them should
 24 have come to you to ask?
 25 **A.** Unless they thought they already had the information

81

1 Can you see an email there -- if we scroll up
 2 a little bit, thank you, and a bit more -- from Andrew
 3 Parsons to, amongst others, you, in July 2014 on
 4 "Suspense account paper Second Sight"? Mr Parsons says:
 5 "Belinda, Angela
 6 "As discussed briefly yesterday, I suspect the
 7 information requested by Ian below [Ian Henderson] is
 8 highly commercially sensitive.
 9 "It may also be that the figures in question are
 10 quite high and ..."
 11 Just stopping there, I think he's there talking
 12 about, is this right, the details of month end balances
 13 and profit and losses?
 14 **A.** Sorry, I didn't quite see the earlier -- what -- is
 15 this --
 16 **Q.** Yes, I'm trying to do this --
 17 **A.** This is about the suspense account? Yeah.
 18 **Q.** -- at some speed.
 19 **A.** I think --
 20 **Q.** Take it from me --
 21 **A.** Sorry, the initial request was around the suspense
 22 account and I think then Ian started to narrow the
 23 request.
 24 **Q.** "The figures in question are quite high, this may then
 25 be portrayed as if there are significant sums each month

83

1 that they needed.
 2 **SIR WYN WILLIAMS:** Who, apart from you, could have given it
 3 to them?
 4 **A.** So it would have been people on the Working Group, so
 5 that would have been Chris Aujard, it would have been
 6 Belinda Crowe and myself.
 7 **SIR WYN WILLIAMS:** Right. So there are three possibilities
 8 in reality, aren't there, because whoever was providing
 9 this briefing had to come to one or more of you three to
 10 have any sense of what was going on?
 11 **A.** Yes.
 12 **MR BEER:** Sir, I'm going to leave that there. Can we take
 13 our second 10-minute break.
 14 **SIR WYN WILLIAMS:** Yes, of course.
 15 **MR BEER:** It's a slightly compressed time in between but
 16 it's because of lunch and other things.
 17 **SIR WYN WILLIAMS:** Yes, of course.
 18 **(12.01 pm)**
 19 **(A short break)**
 20 **(12.10 pm)**
 21 **MR BEER:** Thank you. Can I move to later in 2014, please,
 22 Ms van den Bogerd, by looking at POL00021762, and start
 23 by looking at page 3, please. Then scroll up, please,
 24 to page 2. Yes, sorry, it was on page 3, actually, if
 25 we scroll down.

82

1 that cannot be reconciled with [the Post Office's]
 2 accounts. The inference from this is that [the Post
 3 Office's] processes/accounting systems are flawed given
 4 the volume of discrepancies. Whether or not this is
 5 correct, it is an easy leap to make."
 6 So what Second Sight were saying was that they were
 7 seeking information of the amounts held in suspense
 8 accounts on a monthly basis --
 9 **A.** Yes.
 10 **Q.** -- and also seeking information of where that money went
 11 into the Post Office's profit and loss accounts.
 12 **A.** Yes.
 13 **Q.** Then, if we can go up, please, and again:
 14 "Second Sight have now come back [you're copied in
 15 to this email as well, from Belinda Crowe] and asked for
 16 information on the suspense account. Specifically 'can
 17 we have details of the month end balances for this
 18 account for the last 3 years together with details of
 19 amounts released to [profit and loss]'."
 20 Then you can see what's said in the following
 21 paragraphs, no need to read those in detail. Then up to
 22 the top of the page -- keep going -- Rodric Williams
 23 says:
 24 "... I'd like to avoid giving anything if at all
 25 possible (less is more) ... rather than give them the

84

1 data they've asked for, we should provide management
 2 information which gives context ...
 3 "eg something along these lines", ie global figures
 4 rather than in relation to individual accounts,
 5 essentially; is that right?

6 **A.** Yes.

7 **Q.** This email chain informed you that significant sums each
 8 month were being held in suspense accounts which
 9 couldn't be reconciled with the Post Office's account.
 10 What was done about that?

11 **A.** So this was -- Al Cameron was the CFO, Charles
 12 Colquhoun, part of his Finance Team, and this was being
 13 managed with Al in terms of what we should and shouldn't
 14 be disclosing, in terms of commercial sensitivity.
 15 So I think Al we had met with -- where are we?
 16 2014, I can't remember the date. I think Al met with
 17 them once maybe twice and did produce some responses to
 18 them.

19 **Q.** Is a summary of your answer it was somebody else's
 20 responsibility?

21 **A.** So, whilst I was copied into some of this, I wasn't
 22 driving this particular line with Second Sight. This
 23 was Belinda taking the lead on coordinating the
 24 responses from the Finance Team. I've never seen Post
 25 Office's suspense account.

85

1 this email, I'll read it slowly, Mr Warmington said:
 2 "In the case of those credits to Post Office
 3 suspense accounts, the possibility exists that the
 4 amount that has been received was money that should have
 5 been remitted to a Post Office client or to one of the
 6 Post Office branches."
 7 Understand?

8 **A.** Yes.

9 **Q.** So what he's saying is that, in the suspense account,
 10 there could be money that has been wrongly processed as
 11 a result of errors by branch customers, by branch
 12 employees, by the Post Office itself or by a Post Office
 13 client, yes?

14 **A.** Yes.

15 **Q.** If we go to the top of the page, please, to page 1, and
 16 scroll down, there's a suggested reply. In the third
 17 line of the first paragraph, Belinda Crowe says:
 18 "My initial take is that Second Sight still have not
 19 understood the points we have made or the way that the
 20 Post Office accounting system works. My only comment is
 21 as follows ..."

22 Then scroll down a little further:

23 "I do not think it is appropriate to provide the
 24 source data as it is not for Second Sight to trawl
 25 through a set of spreadsheets to try to identify what

87

1 **Q.** I'll move on. Can we look, please, at POL00307313.
 2 This is an email chain, again involving you, and also
 3 Ron Warmington, Chris Aujard, Belinda Crowe and Andrew
 4 Parsons, again regarding Second Sight's queries about
 5 the suspense account issue, and can we go to page 5,
 6 please, and just go up can we see at the top of the page
 7 and the bottom of page 4. Keeps going, just so we can
 8 see it was Mr Warmington's email. I hadn't realised it
 9 was this long, keep going. Thank you.

10 Mr Warmington to Chris Aujard, Belinda Crowe, copied
 11 to a mediation generic address. This chain was
 12 forwarded on to you and then, if we scroll through it,
 13 please -- I realise there's a lot of text here and the
 14 font is headache inducing. Scroll down, please. He
 15 says:
 16 "... our Working Group's Chairman himself posed
 17 a question which we hope we correctly recall as: 'Could
 18 a surplus in one branch be offset by a shortfall in
 19 another?' We are now extending that question to 'Could
 20 a surplus that is booked into a suspense account in Post
 21 Office be off set by a past, current or future shortfall
 22 in any branch?'"

23 Then, if we keep scrolling, please, and keep
 24 scrolling. Stop there. So there's a lot of
 25 information. I can't find what I'm looking for. In

86

1 they might think is relevant. We will investigate the
 2 cases as and when they arise."
 3 Why did the Post Office believe it was inappropriate
 4 for Second Sight to review data concerning the operation
 5 of suspense accounts?

6 **A.** Because I think, initially, it was thought that the
 7 request was too broad, which is why they met with the
 8 CFO to try to narrow it, to get to more specific. So
 9 there was a reluctance on behalf of CFO, I think, and
 10 Post Office generally, to share the whole suspense
 11 account because it was commercially sensitive.

12 **Q.** The information that Second Sight were putting to the
 13 Post Office disclosed a potentially serious accounting
 14 issue, didn't it?

15 **A.** That was the inference from Second Sight, yes.

16 **Q.** Were the issues raised by Mr Warmington, in fact,
 17 investigated by the Post Office?

18 **A.** Not to my knowledge.

19 **Q.** Do you know why not?

20 **A.** No.

21 **Q.** Would it concern you if there were credit entries from
 22 the suspense accounts that were eventually written off
 23 to the credit of the Post Office, ie its profit and loss
 24 account?

25 **A.** So my understanding was, I've not seen the suspense

88

1 account, and that's not my area -- my understanding how
 2 they work in Chesterfield is that, before they take
 3 anything to profit, that they would have investigated
 4 those particular areas to make sure that it wasn't
 5 appropriate -- you know, applicable to somebody else,
 6 but this is outside of anything I ever did within the
 7 Post Office.

8 **Q.** Even a non-accountant would realise that, if money in
 9 suspense accounts was being attributed to the Post
 10 Office profit account wrongly --

11 **A.** Yes.

12 **Q.** -- that's a very serious issue?

13 **A.** Absolutely, yeah.

14 **Q.** Disputed money --

15 **A.** Mm-hm.

16 **Q.** -- being added to Post Office's bottom line?

17 **A.** Yes, agreed.

18 **Q.** That's what Second Sight were saying, weren't they?

19 **A.** Their line of inquiry was: is it possible that money
 20 that should have been returned to postmasters was being
 21 taken to profit, I think, and that's my lay
 22 interpretation of what they were asking.

23 **Q.** Thank you. Last set of questions from me and it
 24 concerns briefing Ms Vennells in the course of the
 25 Mediation Scheme. Can we look, please, at SSL0000116.

89

1 yet. I'm saying this is my hypothesis at the moment
 2 which I'm trying to disprove. The problem I'm having is
 3 that everything I'm looking at in terms of the evidence
 4 is proving that my hypothesis is right, not that it's
 5 wrong. Okay?

6 "What I'm seeing -- even if you disregard the
 7 650,000 and just talk about the 282,000 -- it looks as
 8 though Post Office concluded that there ought to have
 9 been £282,000 more in sterling or currency in that
 10 branch than there was, and that's correct."

11 You: "Because that's what the printout from both
 12 machines told us."

13 Him: "Yes. Yes. Well, here's my problem. When
 14 a bank does foreign currency dealing -- bear in mind I'm
 15 intimately familiar with that because I used to be
 16 a foreign exchange dealer, both in business and for my
 17 own account, and I worked for many years in banks.
 18 Banks have multi-currency accounting systems, it's like
 19 the Forde Moneychanger on steroids. So if you have, in
 20 a sterling-based bank, loans and -- which are assets --
 21 and borrowings in different currencies, which virtually
 22 all banks have, each of those foreign currency assets
 23 and liabilities is marked to market based on the spot
 24 rate at the end of each day, and the balance at the
 25 variation is processed into a foreign exchange profit

91

1 This a transcript of a telephone call or recording
 2 of telephone call between Ron Warmington and you about
 3 Carl Page on the 5 January 2015.

4 **A.** Yes.

5 **Q.** I presume you didn't know you were being recorded at the
 6 time?

7 **A.** No, I didn't.

8 **Q.** We have already heard a lot of evidence about the trials
 9 of Carl Page -- his trial and his retrial -- in Phase 4.
 10 I think you've read this document and, in summary,
 11 Mr Warmington was expressing his concern over the
 12 prosecution of Carl Page to you, wasn't he?

13 **A.** Yes.

14 **Q.** If we turn up, please, page 7. You say at the top:
 15 "And what he did [that's Mr Page] is plea bargained
 16 it down to £90,000-odd."

17 Mr Warmington: "I know that. I know all that.
 18 I know the whole case in intimately. I've studied it in
 19 minute detail. What I'm saying is I still think --
 20 here's what I think. I think that the Post Office got
 21 this wrong right upfront. I think there was no theft of
 22 £282,000. The plea bargain down to 94 was because --"
 23 You say: "Before you go on, how do you arrive at
 24 that conclusion then?"

25 Mr Warmington says: "I haven't. I've not concluded

90

1 and loss ...

2 "Horizon is not a foreign currency system,
 3 a multi-currency system; it only has sterling. The
 4 Forde Moneychanger has multi-currency accounts, but the
 5 evidence in the documentation shows that the totals in
 6 the Forde Moneychanger system are cleared every time
 7 a command 10, I think -- or every time a weekly report
 8 is produced. I strongly suspect that Horizon was
 9 maintaining a local currency equivalent of the foreign
 10 currency balances meant to be held and, by reason of
 11 doing that, it had basically come to the conclusion that
 12 there was more currency left in that branch than there
 13 really was. Why? Because he'd handed it all over to
 14 Whitehouse.

15 "Whitehouse -- Whitehouse's bank account. It's all
 16 in that stuff. You can see he was running a balance in
 17 his current account of the best part of £400,000 at one
 18 point", so he carries on.

19 "Now, he was -- you know, police and the subsequent
 20 -- the first trial for conspiracy to defraud found no
 21 evidence of conspiracy between the two parties. It
 22 looks, on the face of it, that this ex-professional
 23 footballer, Page, was a complete and utter dope and
 24 had -- was getting no particular benefit out of this.
 25 He was just handing it over."

92

1 You say: "He was getting benefit out of it. He was
 2 getting -- so we pay him a remuneration based on the
 3 value of the sales.
 4 "No, you don't, you pay him £1.16 per transaction
 5 regardless of size, that's in the evidence.
 6 "But he would have been increasing his remuneration
 7 as a result of selling more.
 8 Him: "Bugger all. He gets £1.16 -- it was shown as
 9 £1.12 and then corrected to £1.16 ...
 10 Question: "Why was he doing it then?
 11 "I'm coming to that. I cannot see why he was
 12 moronic enough to be doing that. What I'm getting at
 13 is, it is entirely possible in my mind that he was
 14 getting some benefit that hasn't been disclosed by the
 15 court. However, the key issue is that I do not see any
 16 evidence in any of the trials that any money at all was
 17 stolen ... There is no evidence I've seen yet -- I've
 18 still got about 1,000 pages to go through -- I've seen
 19 nothing in the evidence or in the [investigation report]
 20 or anything else that convinces me that there was any
 21 money stolen."
 22 Then reading on, if we just scroll, please. Keep
 23 scrolling, the discussion continues. Keep scrolling.
 24 Thank you. Discussion continues, keep going.
 25 You carry on discussing it, keep going.

93

1 I said, "Well, give us the information, and we will
 2 re-investigate", and then that went back to Ron.
 3 **Q.** You were disagreeing with him and saying, "We need to go
 4 back and investigate further", and he said, "My draft
 5 report on this case is going to be damning for the Post
 6 Office", didn't he?
 7 **A.** I think -- well, I mean, that's neither here nor there
 8 for my perspective. The point was, if Ron had
 9 information that we had not taken into account when we
 10 did our investigation, then we should have that and we
 11 basically were pushing the process back, I think I said
 12 four to six weeks, for us to look at that information
 13 and to see whether that affected our findings, and then
 14 pass that back to Ron for him to do his piece at the
 15 second stage.
 16 **Q.** He said that he had strong evidence of a miscarriage of
 17 justice, didn't he?
 18 **A.** He was intimating that but he hadn't concluded.
 19 **Q.** A few weeks later, on 2 February 2015, you were sitting
 20 next to Paula Vennells in Parliament giving evidence,
 21 weren't you?
 22 **A.** Yes, at the Select Committee, yes.
 23 **Q.** I'm not going to ask you about the evidence given by
 24 each of you because Parliamentary privilege prevents me
 25 from doing so but Ms Vennells has subsequently stated,

95

1 You're continuing to argue it through with him --
 2 keep going -- and so it continues, okay.
 3 Mr Warmington expressed a view to you, didn't he,
 4 that this was a case of a miscarriage of justice?
 5 **A.** What he was saying to me was that he had information
 6 that we didn't have that was leading him into that
 7 conclusion but he hadn't concluded his investigation.
 8 And I'd asked him, through -- through the conclusion of
 9 this exchange, was "Well, if you have further
 10 information, can you give it to us and we will
 11 re-investigate?" Because at this point we had done the
 12 investigation and produced the POIR, which is then --
 13 and then Ron has gone on to looking at all that
 14 information, and he said he had further information that
 15 he was considering that hadn't been disclosed to us.
 16 So the conclusion at the end of this conversation
 17 was "Well, give me the information and I'll pass it on
 18 to the Investigation Team, and they'll do another
 19 investigation into this case".
 20 **Q.** That can come down. Thank you.
 21 He was expressing his view very strongly that there
 22 had been a miscarriage of justice here and that the Post
 23 Office may have misled the court.
 24 **A.** That's what he was saying, although he was saying he
 25 hadn't concluded his investigation. So that's why

94

1 in her second witness statement to the Inquiry, that, as
 2 that date, 2 February 2015, she had seen no evidence of
 3 any miscarriages of justice.
 4 **A.** Yes.
 5 **Q.** Did you brief Ms Vennells, before 2 February 2015, about
 6 what Mr Warmington had said to you?
 7 **A.** No, because, at that point, we didn't have evidence. So
 8 Ron had a hypothesis and he was working through to
 9 conclusion, so, at that point, there was none. And the
 10 process that we were adopting as part of the scheme is
 11 that we would do the investigations and then our Legal
 12 Team would actually look to see whether there was any --
 13 anything in those reports that questioned the safety of
 14 the conviction and that was something that Chris Aujard
 15 was managing through and updated, I think it was around
 16 September, and the Working Group, that that was
 17 happening, that would be 2014.
 18 So there was that safety net into the scheme process
 19 that we were adopting.
 20 **MR BEER:** Thank you very much, Ms van den Bogerd, they're
 21 the only questions I have.
 22 Sir, before, I think we proceed to the Core
 23 Participants, there's an issue of the self-incrimination
 24 warning.
 25 **SIR WYN WILLIAMS:** Yes. So let me just get this straight:

96

1 it's Mr Henry or Ms Page first?

2 **MR BEER:** Yes, it's the HJA team first, it is Mr Henry.

3 **SIR WYN WILLIAMS:** Can I just be clear, before we embark on

4 questions, are there questions likely to be put by any

5 Core Participant which makes it either necessary or just

6 desirable for me to give a warning about

7 self-incrimination?

8 **MR HENRY:** Desirable, sir.

9 **SIR WYN WILLIAMS:** Desirable. Well, that's enough for me.

10 Ms van den Bogerd, you may have heard of the

11 expression "a warning against self-incrimination",

12 indeed I've given it on occasions at this Inquiry, but

13 if I can now give a formal direction about it.

14 Under our law, a witness at a Public Inquiry has the

15 right to decline to answer a question put to her by any

16 lawyer if there is a risk that the answer to that

17 question would incriminate that witness, and we know

18 this legal principle in shorthand form as the privilege

19 against self-incrimination. I regard it as at least

20 desirable but, more importantly, fair that I remind you

21 of that principle before you answer any further

22 questions to this Inquiry.

23 However, I should tell you that it is for you to

24 make it clear to me that, in respect of any question put

25 to you, it is your wish to rely upon the privilege

97

1 error, if I can put it in that way, which will be

2 rigorously enforced.

3 **MR HENRY:** Thank you, sir.

4 **Questioned by MR HENRY**

5 **MR HENRY:** From 2010 onwards, as you rose higher and higher

6 in the Post Office, did you ever ask this question: that

7 people had gone to prison and it was totally wrong?

8 **A.** No.

9 **Q.** Did it ever occur to you, from 2010 onwards, that the

10 ghastly prospect of miscarriages of justice was

11 occurring on your watch?

12 **A.** Sorry, when you say "on my watch", what do you mean?

13 **Q.** Well, as you rose higher and higher in the organisation

14 and as you were given more and more responsibility, did

15 it ever occur to you that the prosecutorial policy of

16 the Post Office was sending innocent people to prison?

17 **A.** No, I trusted that they were following --

18 **Q.** Keep your voice up, please.

19 **A.** Sorry. No, I trusted that that function were following

20 due process.

21 **Q.** I'm going to suggest to you that there are a number of

22 compelling reasons, aren't there, why the answer you've

23 just given and, in fact, the evidence you have given

24 already to this Inquiry oughtn't necessarily to be

25 believed?

99

1 against self-incrimination.

2 If, therefore, any of the lawyers who are now going

3 to ask you questions put questions to you which you do

4 not wish to answer, on the grounds that to answer might

5 incriminate you, you must tell me immediately after such

6 a question is put and, at that point, I will consider

7 your objection and, thereafter, rule upon whether your

8 objection to answering the question should be upheld.

9 Do you understand what I've said so far?

10 **A.** Yes, I do, sir. Thank you.

11 **SIR WYN WILLIAMS:** Are you represented today in the sense

12 that there is a lawyer in the room who can assist?

13 **A.** I do, yes.

14 **SIR WYN WILLIAMS:** Well, that being the case, if this issue

15 arises and if you wish to consult your lawyer before

16 going any further in the process, then please tell me

17 that and I will consider whether that's appropriate.

18 All right?

19 **A.** Okay, thank you.

20 **SIR WYN WILLIAMS:** Right. I'm sorry to sound like

21 a timekeeper but you have 30 minutes, Mr Henry, and

22 since we are already past 12.30, I propose to take lunch

23 at 1.10 --

24 **MR HENRY:** Thank you, sir.

25 **SIR WYN WILLIAMS:** -- which gives you a slight margin of

98

1 **A.** I don't think so.

2 **Q.** The High Court litigation has left you with the

3 a credibility problem, hasn't it?

4 **A.** In terms of Justice Fraser's comments about me in the

5 first trial.

6 **Q.** It's not just because of what the judge said about your

7 evidence but because of what you said on oath; can you

8 not see that?

9 **A.** Sorry, I don't know what you mean.

10 **Q.** Well, you're now tied to that account, aren't you, what

11 said in those two trials you are now tied to, aren't

12 you?

13 **A.** At the time, when I made the statement, I believed them

14 to be correct. I was cross-examined on both and made

15 some corrections thorough that process as well but, yes,

16 that was my evidence.

17 **Q.** You are now tied to what you said on those trials, for

18 example, in relation to remote access?

19 **A.** Yes, at the time, I believed that to be correct.

20 **Q.** You are worried, aren't you, that if you now admit that

21 you knew about remote access way back in 2010 you'll be

22 liable for perjury; isn't that the truth?

23 **A.** No.

24 **Q.** Let's revisit, very briefly, the remote access timeline.

25 John Breeden's email to you on 5 December 2010, and it's

100

1 POL00088956, but you remember it, don't you?

2 **A.** I don't remember receiving it or reading it at the time,
3 which I've said several times yesterday.

4 **Q.** When we get it up on screen, we can see:
5 "Further to my voicemail message on Friday, please
6 find below the email I have received from Lynn Hobbs."
7 Then omit the next paragraph and go to the last two
8 lines:
9 "I have two further emails from Lynn will I will
10 forward on one relating to Horizon integrity which Sue
11 and Mike have already received and the third providing
12 a brief ahead of the meeting with BIS."
13 We can see further down, of course, there is the
14 email that has been cut and pasted in, which you're
15 familiar with because you were taken to it.
16 Now, the information from John Breeden and Lynn
17 Hobbs should have put you on notice of potential
18 miscarriages of justice, ought it not?
19 **A.** Not to my understanding at the time, no.
20 **Q.** The whole remote access to Horizon issue referred to by
21 Lynn Hobbs in her email of 3 December 2010, which John
22 Breeden forwarded to you, alerted you to a backdoor in
23 the system, didn't it?
24 **A.** So it alerted me that Lynn had raised her concerns to
25 the IT Team and that she was waiting -- sorry, she was
101

1 remember reading any of this context back in 2010.

2 **Q.** "Genuine" is doing some pretty heavy lifting in there,
3 isn't it, Mrs van den Bogerd?
4 **A.** That's my recollection.
5 **Q.** Are you being dishonest about this now or were you
6 inexcusably negligent at the time?
7 **A.** I'm not being dishonest about it and had I -- this
8 registered with me at the time, if I'd seen it, it would
9 have -- I would have had a different outlook on what's
10 come next but I clearly didn't because I hadn't read it
11 at the time.
12 **Q.** Right. So let us carry on, please. Are you accepting
13 now, then, that you are grossly incompetent to have
14 failed to have either read it or failed to appreciate
15 its significance at the time?
16 **A.** I'm saying I've missed things over my time but, in this,
17 I didn't see this and, therefore, I can't be
18 incompetent, if I didn't read it, because I wasn't aware
19 of the contents of it.
20 **Q.** So it was obviously on a matter of central importance
21 that we see again, and again, and again, in fact, very
22 briefly a month later, but you don't register its
23 importance, either because you haven't read the email or
24 because, if you had read the email, you just didn't
25 appreciate its significance, correct?
103

1 awaiting a further update.

2 **Q.** So, when you said that, "So it alerted me that Lynn had
3 raised her concerns to the IT Team", et cetera,
4 et cetera, are you now accepting that you must have read
5 that email at the time?
6 **A.** No, I'm not. I've said that numerous times. This is
7 from reading this email, as part of this disclosure
8 pack.
9 **Q.** Right. I see. So your account is that you had
10 a voicemail from Mr Breeden about remote access, about
11 the Lynn Hobbs email, but that didn't register, correct?
12 **A.** So that's not my account, it's what's --
13 **Q.** Well, it must because we can see, from the document that
14 I have just put to you "Angela, further to my voicemail
15 message on Friday, please find below the email I have
16 received from Lynn Hobbs", so it follows, mustn't it, in
17 order for your account to be consistent, that he'd sent
18 you a voicemail, left a voicemail, and that didn't
19 register with you, correct?
20 **A.** So what I've said is I didn't read this. I don't
21 remember seeing this at all. I haven't received it --
22 **Q.** I'm asking you about the voicemail.
23 **A.** So if he left me a voicemail, I don't know what that
24 would have said at the time because I can't remember
25 that far back. All I'm saying is I genuinely do not
102

1 **A.** Sorry, when you say a month later, are you talking about
2 the Tracy Marshall email?
3 **Q.** Let's go, then, to 5 January 2011, Tracy Marshall.
4 Tracy Marshall, POL00294728. We can see there that
5 Helen Rose is copied in, so it's to Kevin Gilliland, to
6 you and to Helen Rose, and it's entitled "Horizon system
7 issues".
8 Helen Rose, of course, was dealing with the Lepton
9 Post Office system reversal.
10 **A.** That was two years later than this.
11 **Q.** Yes, but she was also copied into this, wasn't she?
12 **A.** She was because she was looking at the data in advance
13 of this meeting.
14 **Q.** I see. You're saying now, here in 2011, that you were
15 not able to discern the significance of this email when
16 you received it; you didn't appreciate its significance?
17 **A.** So what I've said -- no, I didn't, and the reason that
18 I didn't was because I had some assurance from what
19 Tracy had said, and the messaging on remote access
20 changed continuously across my time with Post Office.
21 So I didn't, in terms of this one -- the significance on
22 anything to do with criminal convictions, I didn't
23 understand the significance of any of that.
24 **Q.** You didn't appreciate its significance --
25 **A.** No.
104

1 Q. -- that's your evidence?
 2 A. Yes.
 3 Q. Again, I ask you this: are you being dishonest now or
 4 grossly incompetent then?
 5 A. I'm certainly not being dishonest but that is my
 6 evidence. I'm not being dishonest.
 7 Q. Interesting, isn't it, that the very next day you're in
 8 the Ferndown interview, again with Mr Gilliland, and
 9 I suggest that Ferndown interview of 6 January tells us
 10 all we need to know: that this was a deliberate cover-up
 11 of remote access. What do you have to say about that?
 12 A. It wasn't.
 13 Q. In fact, Mr Baker, of the NFSP actually uses the term
 14 "remote access software" in that interview and you deny,
 15 don't you, you say, "We can't, we cannot go in and
 16 amend". You knew that wasn't true, didn't you?
 17 A. So I was talking about Post Office and that is true and,
 18 to the best of my knowledge that is still true, and the
 19 subsequent conversation about Fujitsu is that it would
 20 leave a footprint.
 21 Q. You didn't mention the material or rather you say you
 22 didn't volunteer the information you were aware of which
 23 you've received from Tracy Marshall because you didn't
 24 have the technical knowledge and you said yesterday that
 25 you hadn't seen the John Breeden email. Do you still

105

1 for them to take that into account when they did their
 2 report.
 3 Q. I'm sure you did want to understand what it was all
 4 about but you remember that you said to Mr Beer, earlier
 5 on today, that by February 2013 you didn't have the
 6 knowledge base about the issue and so, by this time, in
 7 2014, had you acquired that knowledge base?
 8 A. So anything I had of a knowledge base from the Horizon
 9 system and the IT, I got from the IT experts. I never
 10 had that knowledge of my own. I always relied on
 11 information from Fujitsu, whether it was via our
 12 internal team.
 13 Q. But you had to acquire it, didn't you? I mean, you're
 14 in a managerial role. You had to acquire it. What I'm
 15 going to suggest to you is that you are minimising your
 16 level of understanding before this Inquiry, aren't you?
 17 A. No.
 18 Q. Can we go, please, to POL00116957, and can we go to
 19 page 6 of this document, please. We're now in December
 20 2014 and we can see there Avene O'Farrell, who is the
 21 Executive Assistant to Paula Vennells, the Chief
 22 Executive, correct?
 23 A. Yes.
 24 Q. It's dated 9 December 2014 at 7.15 in the evening. It's
 25 received from Donna, so Donna sends it to Avene:

107

1 stand by that evidence?
 2 A. Yes.
 3 Q. Again, I suggest that that's a lie.
 4 A. I disagree.
 5 Q. Let's move on, please, to the Winn-Lusher email and the
 6 Winn-Lusher email is POL00304439. That's dated
 7 9 May 2014 but, if we scroll up, we can see that you in
 8 fact called for the Winn-Lusher email on 14 April 2014
 9 but, again, your evidence is that you didn't -- a little
 10 bit further up -- your evidence to the Inquiry is that
 11 you didn't appreciate the Winn-Lusher email exchange as
 12 being significant either; is that correct?
 13 A. So I forwarded that to others for review on that and
 14 this was in respect of a case in the scheme. So I'd
 15 asked for further information on the basis of this.
 16 Q. I'm not asking about you pushing paper or forwarding
 17 emails; I'm asking about whether you are maintaining,
 18 before this Inquiry, that you didn't appreciate its
 19 significance: yes or no?
 20 A. I hadn't seen this -- in terms of this particular one --
 21 in terms of its significance, sorry, I don't remember.
 22 I know when I had it I wanted to understand what was
 23 involved and I'd asked for the information from Alan
 24 Lusher, which I got. I then forwarded it for further
 25 information and forwarded it into the Investigation Team

106

1 "Angela V and Belinda Crowe are currently dealing
 2 with all Horizon integrity issues ..."
 3 This had been given to you. This was your
 4 responsibility, wasn't it?
 5 A. No, this was very loose wording from Donna. I mean,
 6 this is all to do with what they saw as Project Sparrow
 7 and everything came mine and Belinda's way.
 8 Q. That's another lie. Let's go down there. Let's go down
 9 to Avene O'Farrell, 9 December 2014, 15.28. She's the
 10 Executive Assistant, you've already accepted that, to
 11 Paula Vennells:
 12 "Please see below. Is this something you would deal
 13 with or would Angela [van den Bogerd]? Paula mentioned
 14 earlier that any mention of missing money/IT fault
 15 is/should be dealt with by Angela."
 16 You had carriage of this. You were sitting in the
 17 driving seat, weren't you?
 18 A. Not for IT matters, no. Paula, as we've seen, will
 19 forward emails to me, for some elements, but to the IT
 20 Team for others. So that was not my area of
 21 responsibility in terms of IT.
 22 Q. "... any mention of missing money/IT fault is/should be
 23 dealt with by Angela."
 24 Nobody is suggesting that you've got a doctorate in
 25 information technology but you had been given the

108

1 managerial role, you were here to field it, to deal with
 2 it, weren't you?
 3 **A.** In terms of facilitating things, I would have, but I'd
 4 never been IT qualified and everybody would know that
 5 within the Post Office and anything that, in terms of
 6 IT-specific, I would get from the experts.
 7 **Q.** This all followed, I suggest, this responsibility
 8 imposed upon you by the Chief Executive Officer, Paula
 9 Vennells, all followed on from the way in which you
 10 dealt with the Lynn Hobbs email of 2010, the Ferndown
 11 interview of 2011 and everything subsequently, didn't
 12 it? She knew that you were a safe pair of hands?
 13 **A.** I can't speak for Paula.
 14 **Q.** Don't admit remote access; don't put things in writing;
 15 keep on message; spin the company lines. That's what
 16 she knew about you and that's what you revealed to her:
 17 you would do anything to protect the Post Office.
 18 **A.** No, that's not right.
 19 **Q.** Let's go to POL00139181. This is, again, to do with
 20 Panorama and let's just have a quick look at your --
 21 yes, here we are. You to Mark Underwood.
 22 Mark Underwood's role, it encompassed various
 23 things. He was also liaising with the CCRC; wasn't he?
 24 **A.** I'm not sure.
 25 **Q.** I see. Well, what was his role in this, please?

109

1 the coding. I need a layperson's explanation on what
 2 all this actually means."
 3 Nothing to do about admitting it there, is there?
 4 You had all of the information at your disposal to show
 5 that what Richard Roll was saying was correct.
 6 **A.** Not from my understanding, which is why I asked the
 7 question of Mark, to reach out to Fujitsu to get the
 8 response --
 9 **Q.** Let's have a little closer look at your understanding by
 10 going back to page 1. Do you know the difference
 11 between right and wrong?
 12 **A.** Yes.
 13 **Q.** "Mark,
 14 "There is another part of [Richard Roll] and JS
 15 discussion that is relevant.
 16 "JS: Some people have been ruined financially.
 17 People have gone to prison. Is it possible that
 18 suffering could have been caused because there are
 19 problems in the Horizon system?
 20 "Yes, it is possible."
 21 What's your response, Mrs van den Bogerd, "Oh my
 22 God, could this be true? What are we going to do about
 23 it"? No, it's:
 24 "Any further comments/positioning on the above
 25 please?"

111

1 **A.** So Mark was part of Project Sparrow, he was working with
 2 Belinda and Mark here was coordinating. So I'd asked
 3 him for some information and Mark coordinated that, so
 4 he did reach out to Fujitsu on occasions to get the
 5 information -- what was the relevant information for
 6 whatever query we had.
 7 **Q.** You knew, by this time in 2015 -- and I suggest it is
 8 absolutely clear -- you knew about Helen Rose and Lepton
 9 and you'd even liaised with Gareth Jenkins about that,
 10 correct?
 11 **A.** On the Lepton, yes.
 12 **Q.** Yes, and you liaised with him, no doubt, about automatic
 13 system reversals, which looked like they were being
 14 perpetrated by the subpostmaster but, in fact, they had
 15 absolutely nothing to do with the subpostmaster at all;
 16 correct?
 17 **A.** It was auto generated by the system, yes.
 18 **Q.** You knew about Lynn Hobbs by then; you knew about Tracy
 19 Marshall; you knew about Winn-Lusher. Can we turn,
 20 please, to page 3 of this document.
 21 Again, you're asking Mark Underwood:
 22 "Would you also provide Post Office response to what
 23 Richard Roll said on the programme? Key discussion
 24 point on Monday. I'd like a robust response/explanation
 25 of the mention of going in by the back door and altering

110

1 What did you mean by "positioning"?
 2 **A.** I just wanted to understand, from what he said, what the
 3 implications were and I wanted an update, so I was fully
 4 informed, I think this was going into a mediation the
 5 following week.
 6 **Q.** You see you knew, didn't you -- and I suggest you knew
 7 from 2010 -- that remote access to subpostmasters'
 8 accounts and the covert insertion of data was feasible
 9 and that that would have brought down the entire
 10 prosecution edifice, wouldn't it?
 11 **A.** As I've said, my understanding was that it changed over
 12 the years and I didn't make any link to prosecutions on
 13 the basis of my knowledge. That was information I was
 14 relying on the Legal Team to deal with.
 15 **Q.** You were deliberately suppressing the truth. You were
 16 allowing decent people to be prosecuted on the back of
 17 a flawed IT system, weren't you?
 18 **A.** No, I would never do that.
 19 **Q.** You were letting wrongful convictions stand in the full
 20 knowledge that the IT system and the accounts could be
 21 manipulated behind the subpostmasters' backs?
 22 **A.** No. As I've said, I didn't have the knowledge to be
 23 able to make that distinction.
 24 **Q.** In fact, the subpostmasters' ignorance of all this was
 25 the Post Office's strength, wasn't it?

112

1 **A.** No.

2 **Q.** I'm sitting next to Mr Parmod Kalia, the subpostmaster
3 of Chipperfield Road Post Office in Orpington in Kent.
4 He'd previously worked for NatWest before taking on the
5 branch in 1990. All went well for 10 years until
6 Horizon was installed in 2000. Shortfalls started and
7 he borrowed well over £20,000 from his elderly mother to
8 cover them. Then, in July 2001, an audit was conducted
9 at his branch and a shortfall of £22,000-odd was found.
10 Mr Kalia paid back the money but he was still
11 prosecuted, pleaded guilty at Bromley Magistrates' Court
12 on 17 December 2001, and he was sentenced to six months'
13 imprisonment at Croydon Crown Court on 8 March 2002.
14 It totally devastated his life, blew apart his
15 family, had a severe and profound impact on his mental
16 health with effects too harrowing -- even though he
17 would allow me to tell you -- but really too harrowing
18 to disclose in public, and he now lives alone in
19 a community centre. He wrote to your boss, Paula
20 Vennells, on 21 August 2015. Could we please put that
21 up on the screen, please, POL00141757.
22 I'll just read a little bit out because I'm pressed
23 for time. He wrote to Mrs Vennells as follows:
24 "Knowing what you know about the Horizon system and
25 especially as it was a new novelty in 2001, surely you

113

1 "There is also no evidence of transactions recorded
2 by branches being altered through 'remote access' to the
3 system. Horizon does not have functionality that allows
4 the Post Office or Fujitsu to edit or delete the
5 transactions recorded by branches."
6 It is a blatant lie, isn't it?
7 **A.** That was my understanding of what I'd been provided with
8 at the time.
9 **SIR WYN WILLIAMS:** Well, hang on a second. What's the date
10 of this letter, 9 September --
11 **MR HENRY:** 2015.
12 **SIR WYN WILLIAMS:** -- 2015. From memory, and I it may be
13 that I've got it wrong but, in the answering questions
14 of Mr Beer yesterday, was it not before 9 September 2015
15 that a Fujitsu employee had confirmed that remote access
16 was possible? I may have got the dates wrong but it was
17 certainly 2015. You accepted that, as from that date --
18 or at least this is my take on what you accepted -- that
19 having been told officially by Fujitsu in 2015 that this
20 was possible, that you accepted that information or
21 should have accepted that information?
22 **A.** That's correct and it's actually in the next paragraph
23 down --
24 **SIR WYN WILLIAMS:** Right.
25 **A.** -- which is referring to the balancing transaction.

115

1 would agree that there were/are problems, bugs with the
2 system that made cash disappear? I understand there's
3 a team dealing with errors creating false losses and
4 financial records were changed remotely without the
5 postmasters' knowledge or knowing. I should be grateful
6 if you could reopen my file and investigate the handling
7 of my case."

8 Can we go now, please, to POL00119518. This is your
9 response. Can we scroll up, please, because you signed
10 this on behalf of your boss -- scroll down, please.

11 Yes, there we are:

12 "All of the allegations that were presented on the
13 Panorama programme have been exhaustively investigated
14 and tested by the Post Office and various specialists
15 over the past three years or more. The investigations
16 have not identified any transaction caused by
17 a technical fault with Horizon which resulted in
18 a postmaster wrongly being held responsible for a loss
19 of money".

20 What about Lepton?

21 **A.** Sorry, what do you mean about Lepton?

22 **Q.** Oh, well, if you don't understand the question I'm going
23 to move on. It's a blatant lie, isn't it?

24 **A.** What is?

25 **Q.** Let's go on to the next paragraph:

114

1 **SIR WYN WILLIAMS:** So it's the balancing transaction point,
2 all right?

3 **A.** Yes.

4 **MR HENRY:** I see, it's the euphemism point, it's the
5 Orwellian point: truth is lies; freedom is slavery;
6 ignorance is strength; we'll call it a balancing
7 transaction so that we can get around remote access.
8 Isn't that right?

9 **A.** No, that's not. That was the balancing transaction,
10 which is what Sir Wyn was referring to, which is the
11 email from, I think, James Davidson from Fujitsu.

12 **Q.** Well, I got --

13 **SIR WYN WILLIAMS:** That's what I had in mind yes.

14 **MR HENRY:** I've got one more topic and I think I can squeeze
15 it in in five minutes.

16 **SIR WYN WILLIAMS:** Four minutes, Mr Henry.

17 **MR HENRY:** Four minutes. POL00027684. While that's being
18 brought up, twice yesterday you denied any knowledge of
19 a plan to eject Second Sight, correct?

20 **A.** I said I hadn't been involved in all the discussions,
21 yes.

22 **Q.** Do you accept that -- confirm, please, so it's
23 completely unambiguous: you had no inkling, no knowledge
24 at all of a plan to exit them from the Mediation Scheme?

25 **A.** No. I mean, I said I knew we were a business and not

116

1 happy with the progress and the cost but this is
 2 referring to me getting resource to be able to
 3 investigate the cases in the scheme.
 4 **Q.** Can we go to page 3, please, and, again, I suggest that
 5 you are now wriggling on this issue but I'll deal with
 6 it in this way. 13 November 2013, 22.06:
 7 "Hi Kevin", et cetera, et cetera.
 8 Go to the next paragraph. This is about the
 9 suggestion that the Security Team should be involved in
 10 the mediation, like putting foxes in charge of a chicken
 11 coop, I suppose, but anyway:
 12 "These individuals have the experience and skillset
 13 required to investigate the cases and will be highly
 14 credible with Second Sight as we start to initiate their
 15 exit from the scheme."
 16 That would have been news to Second Sight, wouldn't
 17 it, that we're going to exit them from the scheme
 18 13 November 2013?
 19 **A.** Yes.
 20 **Q.** You were lying yesterday, weren't you?
 21 **A.** No, I wasn't.
 22 **Q.** In fact, you're lying again today?
 23 **A.** No, I'm not.
 24 **Q.** As you have done throughout, I suggest.
 25 My final question is: do you have any idea of the
 117

1 two topics, if I may.
 2 The first is the briefing of MPs on 18 June 2012
 3 and, in particular, the briefing in respect of
 4 Jo Hamilton, who sits here.
 5 Then the second topic I'd like to ask you about is
 6 the Lepton issue, the Helen Rose Report or Helen Rose
 7 investigations.
 8 So, firstly, the briefing of MPs on 18 June 2012.
 9 This meeting came about because of concerns expressed
 10 about the integrity of Horizon, didn't it?
 11 **A.** Yes.
 12 **Q.** Yes, that people were perhaps being wrongly convicted?
 13 **A.** Yes.
 14 **Q.** It was meant to be an open and transparent engagement
 15 with MPs, wasn't it?
 16 **A.** Yes.
 17 **Q.** Can we look at the briefing pack, the Post Office
 18 briefing pack, for this meeting, which is POL00027722.
 19 If we could please go to page 3 of that. Thank you.
 20 We see there that Alice Perkins, who was the Chair
 21 at that time, was due to say that:
 22 "We appreciate taking the time to meet us today.
 23 "We take this issue very seriously. This impacts
 24 the lives of individuals, public money is at stake and
 25 so is our reputation."
 119

1 suffering you have caused, the many lives that have been
 2 blighted with you contributing to that pain and that
 3 cruelty; have you any idea?
 4 **A.** I appreciate the level of suffering that would have
 5 inevitably happened as a result of prosecutions. I was
 6 never involved in the prosecutions and my work has been
 7 trying to understand whether there was any issues with
 8 the Horizon system through the scheme.
 9 **SIR WYN WILLIAMS:** Thank you, Mr Henry. We'll adjourn now
 10 until what time, Mr Beer?
 11 **MR BEER:** 2.00, please.
 12 **SIR WYN WILLIAMS:** 2.00, Mr Beer. Very well.
 13 (1.09 pm)
 14 (The Short Adjournment)
 15 (2.00 pm)
 16 **SIR WYN WILLIAMS:** Mr Beer, I think this afternoon we've got
 17 four questioners, one on the longer side, one on the
 18 shorter side, so can we have a longer one and a shorter
 19 one and then a break and then a longer one and a shorter
 20 one and conclude.
 21 **MR BEER:** Yes, we can do that, sir. I think it's Mr Moloney
 22 first for 45 minutes, sir.
 23 **SIR WYN WILLIAMS:** Fine.
 24 Questioned by MR MOLONEY
 25 **MR MOLONEY:** Ms van den Bogerd, I'd like to ask you about
 118

1 Then, importantly:
 2 "We are open to feedback and we will provide you the
 3 information we have available. We want to work with you
 4 to address all of your concerns and we would rather be
 5 talking to you about the amazing things we are doing at
 6 the Post Office but we need to address this concern, so
 7 today we will just focus on this."
 8 Now, your role at this briefing as Mr Beer
 9 established yesterday, was to deal with the case
 10 studies -- yes --
 11 **A.** Yes.
 12 **Q.** -- two of them, and one of them was Jo Hamilton who is
 13 James Arbuthnot's constituent?
 14 **A.** That's correct.
 15 **Q.** You were aware that he had formed the view that she
 16 wasn't guilty of any crime and he had real concerns
 17 about it?
 18 **A.** I can't remember exactly what was said because there was
 19 the first meeting --
 20 **Q.** Just the general line, no need to expand. That was the
 21 general line of things, wasn't it --
 22 **A.** Okay.
 23 **Q.** -- that he was concerned that she wasn't guilty?
 24 **A.** Mm-hm, yeah.
 25 **Q.** He sought throughout this meeting to have his concerns
 120

1 addressed, as was focused upon in the briefing pack by
2 Ms Perkins. Now, he had to have the full picture in
3 order to have his concerns addressed; "all the
4 information you have available" as Ms Perkins described
5 it?

6 So, presumably, with the responsibility of the case
7 studies, you researched the *Jo Hamilton* case as fully as
8 you possibly could?

9 **A.** At that time I extracted the information from what had
10 been done before. So I didn't do a new investigation
11 into the case, it was just what we had from the records
12 is what I pulled together with the key facts.

13 **Q.** So that --

14 **SIR WYN WILLIAMS:** You're dropping your voice again.

15 **A.** Sorry.

16 **MR MOLONEY:** It helps to get quite close to the microphone.

17 I think my voice would be very much dropped, if I was
18 away from the microphone, as well.

19 **A.** Okay.

20 **Q.** So you looked at the available documentation --

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

22 **Q.** -- in order to prepare your briefing and so that's the
23 investigation report the prosecution file, and so on?

24 **A.** Yes.

25 **Q.** Yes. Now, what you had, as perhaps the full picture or
121

1 mitigation. There was a hearing before Winchester Crown
2 Court and the subpostmaster pleaded guilty to
3 14 separate counts of false accounting. This was
4 accepted by POL on the basis that the losses are repaid
5 in full by 25 January 2008 and the count of theft to
6 remain on the file until the payment is made in full and
7 then we see the sentence and then we see the payment of
8 the outstanding matters.

9 So this was your *aide memoire* for the summary that
10 you were to provide to Mr Arbuthnot, as he then was,
11 Member of Parliament?

12 **A.** Yes.

13 **Q.** Yes. Can we just look at the investigation report of
14 Mr Brander, which is POL00044389. Thank you very much.
15 If we could go to -- this is the investigation report
16 just to introduce it, it's Josephine Hamilton when she
17 started, and so on. If we could go to the second page,
18 please. Could we scroll down towards the bottom because
19 it deals with the audit yes.

20 So, thank you very much. So Mr Stuart completed
21 a full audit of the cash and stock and identified that
22 deficit, and then, at the bottom, Mr Stuart also
23 identified an additional £61.77 shortage on Horizon
24 which couldn't be accounted for and thus the figure
25 posted to late accounts was -- and if you could go to
123

1 the basis for the full picture, begins at page 13 of
2 this same document, if we could turn that up please.
3 You don't need to go through all of this page but this
4 is Example Case 1, and this Josephine Hamilton begins
5 working at the South Warnborough SPSO, and so on. We go
6 down this page and it shows us all the different
7 incidents in terms of unidentified losses, with
8 Ms Hamilton on 24 February 2005 just, for example,
9 requesting hardship payments to be set up to clear the
10 loss, and so on.

11 If we could come on to the second page please we
12 come on to the audit and investigation. We see
13 Ms Hamilton signed off on 7 March 2006 and we see on
14 9 March 2006 there's an audit undertaken with the
15 deficiency of £36,644.89, and the cash figure on Horizon
16 stated to be £37,360.06. The subpostmaster was
17 precautionary suspended as a result of the shortfall and
18 she was requested to attend an interview under caution.

19 We then see how that progressed and, so, on 5 May
20 2006, we have the provision of the pre-prepared written
21 statement, which sets out what Mrs Hamilton has to say
22 about all of this. On 11 October 2006, the decision to
23 prosecute, and 30 October 2006 the summons is issued.

24 Then, just over to the final page, please, we see
25 the defence offered pleas to false accounting by way of
122

1 the next page please -- £36,644.89, this being the loss
2 to Post Office Limited.

3 Now, that was an extra shortfall that had developed
4 overnight, wasn't it?

5 **A.** I'm sorry, I don't know.

6 **Q.** The £61-odd --

7 **A.** Okay.

8 **Q.** -- that was a shortfall that developed overnight.

9 Then, if we could go the bottom of this page, we see
10 there that Mr Brander says that:

11 "Having analysed the Horizon printouts and
12 accounting documentation I was unable to find any
13 evidence of theft or that the cash figures had been
14 deliberately inflated."

15 Then if we could go to page 7, please, and down to
16 the bottom of page 7, please, we see, in the penultimate
17 paragraph:

18 "The only evidence appears to be the fact that the
19 audit identified the money as missing. Concerns only
20 came to light following a request to return excess cash
21 and instead doing so Mrs Hamilton was signed off as
22 sick."

23 None of those details were mentioned in your
24 explanation of Mrs Hamilton's case to Mr Arbuthnot MP,
25 were they?
124

1 A. No.

2 Q. He wanted to know all about this case, he wanted to be
3 able to be reassured and those things weren't in there,
4 were they?

5 A. No, because it was a snapshot of what had gone, I don't
6 know exactly what I reviewed but, that information isn't
7 in what I presented.

8 Q. No. I took you, just before, to your description of
9 what happened, so far as the prosecution was concerned,
10 and you said the theft matter would lie on the file
11 until a particular date?

12 A. Yes.

13 Q. Yeah, but what actually happened was that Post Office
14 Limited only agreed not to proceed with the theft charge
15 on the basis that the outstanding shortage was paid by
16 the time of sentence. If she hadn't paid by the time of
17 sentence then she would face a trial on theft. It was
18 made clear to her that there must be some recognition
19 that the defendant had the money short of theft and that
20 a plea on the basis that the loss was due to the
21 computer not working properly will not be accepted.

22 Now, those words are taken directly from the Court
23 of Appeal Criminal Division judgment in *Hamilton* but the
24 additional fact that she had to accept the basis of plea
25 that the money -- and there was also the additional fact

125

1 Q. You didn't need to do an investigation to include those
2 details, Mrs van den Bogerd. The fact that there was no
3 evidence of theft, says Mr Brander, and yet she was
4 still charged with theft, doesn't that have to go into
5 your summary so that this MP actually knows what went on
6 with his constituent's case?

7 A. So what I'm saying is I don't know if I'd actually seen
8 that in the information that was made available to me at
9 the time because a lot of --

10 Q. It was in the investigation report, Mrs van den Bogerd.
11 You said you read that?

12 A. So I read whatever files that we had available, and
13 I don't remember exactly what files they were but that's
14 the information I pulled from there.

15 Q. So when I asked you if you read the investigation report
16 and you said, "Yes", that might be wrong?

17 A. I don't remember, in terms of what -- so I was given
18 some files and asked to pull a synopsis together for two
19 cases. As I said, I didn't do any investigations at
20 that point, it was on the basis that the investigation
21 has already been done and I pulled the information and
22 I can't recall exactly what files I looked at.

23 Q. Where might you have got that information from then,
24 just to test that? From what documents might you have
25 got your information from?

127

1 that she had to accept that, in her basis of plea, that
2 she couldn't blame Horizon. None of that was in your
3 summary either, was it?

4 A. So I've -- that wasn't in what I reviewed, I don't
5 believe, because I --

6 Q. You didn't see that in the prosecution file?

7 A. No.

8 Q. Right. I won't press that but all of that detail, that
9 there was no evidence of theft, that the audit showed
10 that there had been an additional shortfall overnight,
11 that the only evidence was the shortfall, and then
12 surely you must have seen that she was told that, if she
13 didn't pay on time, she'd have been proceeded against
14 with theft; that was so important to that decent MP
15 trying to find out what had happened to his constituent,
16 wasn't it? That detail should have been included,
17 shouldn't it?

18 A. So the detail that you've just gone through is not the
19 detail that I had -- that was made available to me. So
20 I've taken what I understood to be the key points out of
21 the information that was provided to be able to provide
22 that synopsis of what had happened. But as I say,
23 didn't do an investigation at that point into the case,
24 it was lifting information from what had already been
25 pulled together.

126

1 A. Sorry, can we go back to the synopsis, so I can just
2 have a look at that please?

3 Q. No, please just answer that. You've said you're not
4 sure about whether or not you saw the investigation
5 report. First of all, you said you had seen it, then
6 you said that you're not sure if you saw it. So I'd
7 like to know what type of documents in the file that you
8 received might have provided you with the information
9 that you used in order to compile that summary for
10 Mr James Arbuthnot MP?

11 A. So from recollection, it would have been the audit,
12 I presume, to get the information. There would have
13 been some summary of what had happened but, without
14 having actually the files, I can't remember exactly what
15 I referred to. But I didn't -- I mean, what I did,
16 I traditional to lift the key points and put them into
17 that synopsis so I could share that with two MPs and
18 I did that for both cases.

19 Q. I'll cut to the chase. Did you not tell James Arbuthnot
20 about the view of Mr Brander and what happened at the
21 audit because, to use a phrase we heard in a different
22 context yesterday from Mr Parsons, it distracted from
23 what was otherwise a very clear picture, so far as you
24 were concerned?

25 A. No, I didn't. When I asked -- when I was asked to pull

128

1 it together, this was at the start of me getting
 2 involved in the investigations and I just wanted to
 3 present the picture as I saw it from the information
 4 I had available.

5 **SIR WYN WILLIAMS:** Well, it comes to this, really, doesn't
 6 it: that the picture that you painted for Mr Arbuthnot
 7 effectively summarises the points that supported the
 8 Post Office case and then you went on to give
 9 information about sentence, et cetera? What you didn't
 10 do was to reveal that, in the Investigator's report, so
 11 one of the first documents to come into existence --
 12 these are my words -- some doubt had been cast upon the
 13 charge of theft?

14 **A.** So I don't recall that I was aware of any doubt at that
 15 point and, had I been aware of it, I would have raised
 16 it at the time. But that's my recollection and I can't
 17 remember exactly what documents I was presented with to
 18 pull that together.

19 **SIR WYN WILLIAMS:** Well, without wishing to repeat
 20 a Mr Henry-ism, if you weren't provided with such
 21 a basic document as the Investigator's report, doesn't
 22 that amount to negligence on someone's part?

23 **A.** I mean, I would have expected to have had all the
 24 information provided to me at the time and I don't even
 25 remember who gave me the information.

129

1 **A.** That's correct.

2 **Q.** Could we go back to POL00097481. Thank you.
 3 This email chain was sent to you. Could we please
 4 go down the page. Towards the bottom, we see there that
 5 Helen Rose has sent that to you on 13 February 2013,
 6 Angela and Elaine. If we could keep going down to
 7 an email from Gareth Jenkins, keep going please. Keep
 8 going. Yes, and just one more, please. Right.

9 Now, this is an email from Mr Jenkins to Helen Rose
 10 and we see on this that, at the bottom of that page,
 11 this is really the nub of it, isn't it, when he says:
 12 "However what I was able to confirm from my look at
 13 the live data a couple of weeks ago and is also held in
 14 the underlying raw logs is confirmation that the
 15 reversal was generated by the system (and not manually
 16 by the user)."
 17 Yes?

18 **A.** Yes.

19 **Q.** He was able to do that by looking at the raw data, the
 20 live data and the underlying raw logs, which couldn't be
 21 ascertained from the ARQ logs; that's the nub of it,
 22 isn't it?

23 **A.** Yes.

24 **Q.** Now, could we please just then go up to the email in
 25 response from Helen Rose. She says:

131

1 **SIR WYN WILLIAMS:** All right.
 2 Sorry for interrupting, Mr Moloney.

3 **MR MOLONEY:** Not at all, sir.
 4 I was just going to conclude this by saying: did you
 5 give the details that were designed to support your
 6 company; is that what you gave?

7 **A.** Not knowingly. I mean, as I said, I just pulled the
 8 information from what I had available to put that case
 9 forward as an example of what had happened. I didn't
 10 knowingly do anything else other than that, present the
 11 facts as I saw them.

12 **Q.** Second topic is Lepton. Now, Mr Beer has asked you
 13 about Lepton this morning and indeed, he asked you
 14 briefly about it yesterday and you described having many
 15 conversations on the Lepton issue.

16 **A.** Yes.

17 **Q.** Yes.
 18 Today you were asked by Mr Beer:
 19 "So when Helen Rose was raising with Mr Jenkins and
 20 then drawing to your attention the fact that basic ARQ
 21 logs are used for evidence in court and, therefore, in
 22 some circumstances, we would not be giving a true
 23 picture to the court, that didn't ring any alarm bells?"
 24 You said:
 25 "Not for me at the time."

130

1 "Hi Gareth
 2 "Thanks for the response. I can see where this
 3 transaction is and now understand the reason behind it.
 4 My main concern is that we use the basic ARQ logs for
 5 evidence in court and if we don't know what extra
 6 reports to ask for then in some circumstances we would
 7 not be giving a true picture.
 8 "I know you are aware of all the Horizon integrity
 9 issues and I want to ensure that the ARQ logs are used
 10 and understood fully by our operational staff that have
 11 to work with this data both in interviews and in court."
 12 Now, what was it about those words that did not ring
 13 alarm bells for you, Mrs van den Bogerd, about the use
 14 of ARQ data in court?

15 **A.** So I was looking at this from understanding what had
 16 happened in the Lepton case. Anything that Helen was
 17 raising in respect of what they did in the Security
 18 Team, I expected her to raise within her line, which
 19 I think is what she did do with this, anyway. But that
 20 didn't -- I didn't -- it didn't have alarm bells for me
 21 at that point because I thought that was within Helen's
 22 space and she would do that with her direct line.

23 **Q.** The alarm bells, whether it's her responsibility or your
 24 responsibility, surely the alarm bells ring and say:
 25 actually, what we're putting out there in court may not

132

1 be accurate? Isn't that what she's saying to you?
 2 Isn't that whether it's her responsibility, your
 3 responsibility? What does that matter? You're somebody
 4 very senior in Post Office who, if the email that
 5 Mr Henry showed shortly before lunch is accurate, had at
 6 least some involvement in Horizon integrity issues.
 7 Does this not ring any alarm bells, Mrs van den Bogerd?

8 **A.** As I said, it didn't.

9 **Q.** Should it have done, Mrs van den Bogerd?

10 **A.** Well, with what I know now, then I would look at this
 11 very, very differently. At the time, it just didn't
 12 ring any alarm bells with me.

13 **Q.** Right. Well, let's just go further up and see what else
 14 might not ring alarm bells. Penny Thomas responds,
 15 saying, "yes, Gareth it is". That's about the change
 16 request. If we could just go a little bit further up.

17 In fact, that's when Mr Jenkins has said that he
 18 understand Helen Rose's concerns, "I understand your
 19 concerns", and then it's the change request. If we
 20 could just go a bit further up from there. Helen Rose
 21 says:

22 "Angela/Elaine

23 "For information

24 "Email string may be of interest. I'm not really
 25 sure where to take this. Happy to try for a change

133

1 operator?

2 **A.** Yes, as part -- it was part of that transaction, in
 3 terms of the recovery, yes, and it would have -- it
 4 wouldn't have -- yes.

5 **Q.** Is that yes? Is the answer yes?

6 **A.** Yes.

7 **Q.** It is, isn't it?

8 **A.** System generated, yes.

9 **Q.** That standard ARQ data and Credence data didn't show
 10 whether or not the reversal had been made by the
 11 operator or the system?

12 **A.** Yes.

13 **Q.** Yes, and it was only looking at the raw data that it was
 14 possible to see if the reversal had been made by the
 15 operator or the system?

16 **A.** Yes.

17 **Q.** Yes. Now, I can take you to it if you need me to but
 18 you told the Horizon Issues Trial that you thought that
 19 the change request had not occurred, yes, hadn't
 20 taken --

21 **A.** I said I didn't think it -- it hadn't taken -- yes.

22 **Q.** Yes. Can we please look at POL00140211.

23 So I'll repeat that: POL00140211. You were taken to
 24 this yesterday by Mr Beer, it's the meeting with
 25 Panorama. If we could go to page 22, please, and to the

135

1 request if you would like me to but at this moment in
 2 time don't want to tackle one small issue when we may
 3 need to challenge deeper issues with the way we see data
 4 from Fujitsu/Credence."

5 No alarm bells for you there about deeper issues on
 6 the way we see data from Fujitsu/Credence when you were
 7 tasked with Horizon integrity issues, Mrs van den
 8 Bogerd?

9 **A.** So, at this time, I was tasked with getting under the
 10 skin of what had happened in Lepton. As I've said,
 11 Helen was in the Security line and that was something
 12 that I expected her to do through her line. That wasn't
 13 for me to do and, therefore, it didn't register with me.

14 **Q.** Were you just wilfully blind to this, Mrs van den
 15 Bogerd?

16 **A.** No, I wasn't and, you know, I wish that I had the
 17 insight then that I have now to read that very
 18 differently. But, for me, it was about understanding
 19 what had happened in the Lepton case and the change
 20 request would have triggered the ID being changed on the
 21 automatic -- sorry, the system generated reversal, so
 22 that would have been evident going forward.

23 **Q.** Okay, so just in terms of this, then, what you took from
 24 this, would it be fair to say, is that reversals could
 25 be performed by the system, independent of the manual

134

1 bottom of that page.

2 **A.** Sorry, did we go to this yesterday? I don't think so.

3 **Q.** Okay, well, it's here anyway and you have seen it,
 4 haven't you?

5 **A.** I have seen it previously, yes.

6 **Q.** Okay, and it's the final thing on the page:

7 "We do have a service level agreement, yes. We get
 8 a number of archive pulls from the system as part of
 9 that and if we exceed that then it is a cost. I think
 10 the important thing here is for all the cases in the
 11 scheme who have actually pulled those archives and
 12 I referred to the, we call it ARQ information and we
 13 provide that which beefs up the supporting evidence and
 14 that is about every keystroke. It leaves a footprint of
 15 what happened over that period of time and that would
 16 have been done in the court case."

17 **A.** Yes.

18 **Q.** "If we are, and I'm talking generically here, if we're
 19 bringing a case against someone in terms of prosecution
 20 every piece of information, all the evidence that we
 21 will draw on to bring that case will be presented and
 22 will be presented to the defence team as well. So that
 23 information, I don't know the ins and outs of the case
 24 anyway, but that information would have been provided by
 25 us and it cost us, it cost us. That's part of the cost

136

1 of, you know, there are legal costs and there are other
2 costs involved in bringing the case, so that information
3 not have been used of that was the case."

4 Over to the next page, please. Mr Bardo says:

5 "And so for everybody on the Mediation Scheme that
6 ARQ data has been pulled which means there is ... so
7 what kind of a picture do you have then of everything
8 going on in the system for all of the cases in the
9 Mediation Scheme? Complete?

10 "Complete."

11 Matt Bardo says: "Every single keystroke."

12 You say: "Absolutely."

13 Why didn't you tell them about Lepton at that point?

14 **A.** Sorry, what do you mean? Tell them about what?

15 **Q.** Well, the system could reverse it and you wouldn't know
16 from ARQ data whether or not the postmaster had done it,
17 and so not every keystroke, not everything, was able to
18 be discerned from ARQ data?

19 **A.** Well, we would have seen that it had been reversed and
20 the postmaster themselves would have known that it had
21 been reversed, it just wouldn't have pointed to the auto
22 reversal at that point but he would have had and he did
23 have disconnected receipts and reversal receipts printed
24 in that case.

25 **Q.** He wouldn't know -- the whole thing about Lepton was

137

1 **A.** In the trial or for this, sorry?

2 **Q.** In Panorama and in the trial.

3 **A.** So, in the trial, it was -- I gave what I believed were
4 the facts, and the facts were that the reversal had been
5 generated by the system and I think the question for me
6 was whether the postmaster knew that it had been
7 reversed and he did, albeit later, because he did have
8 the receipts. I think that was the point around there.
9 I understood from the Panorama that I was giving the
10 facts as I understood them to be when I gave that
11 interview.

12 **Q.** Why didn't you mention Lepton to Panorama?

13 **A.** Because we weren't talking about specific cases.

14 **Q.** Were you not talking about the overall picture, about
15 how basically you could support everything that
16 happened?

17 **A.** Sorry, I didn't hear that.

18 **Q.** Were you not talking about the overall picture about you
19 could support basically everything that happened because
20 of the data you had that covered everything off?

21 **A.** I was given a general picture of what were able to do
22 and had been doing, yes.

23 **Q.** Why not tell them about Lepton?

24 **A.** Because, as I said, we weren't talking about specific
25 cases.

139

1 somebody had paid their phone bill and actually they
2 hadn't, and you didn't know whether or not that reversal
3 was made by the system or by the operator from the ARQ
4 data. That's the reality of the Lepton issue, isn't it?

5 **A.** In terms of the ID, yes, but the reversal had been done
6 and that's why the bill wasn't paid.

7 **Q.** You then maintained that every keystroke was seen from
8 the ARQ data in the Horizon issues trial, and Mr Justice
9 Fraser found against you on that, didn't he? Indeed,
10 there was other evidence that said you were wrong about
11 that.

12 **A.** I think it was around -- I got confused with what
13 Credence did, from memory, I think, as opposed to ARQ
14 information.

15 **Q.** Yeah.

16 **A.** And --

17 **Q.** Well, you were wrong about ARQ and Credence, weren't
18 you? They just didn't record every keystroke.

19 **A.** So Credence didn't, and that's what I -- from memory,
20 that's what I was asked about and I agreed with Patrick
21 Green that it was Credence and then corrected that later
22 in the trial that I'd been mistaken on Credence and it
23 was actually ARQ that I was talking about.

24 **Q.** You didn't give the full picture, again, about what you
25 knew about Lepton, did you, Mrs van den Bogerd?

138

1 **Q.** Did it detract from what was otherwise a very clear
2 picture for you, Mrs van den Bogerd?

3 **A.** What, the Lepton case?

4 **Q.** Lepton?

5 **A.** No, what it did is it highlighted that the -- you know,
6 it wasn't obvious that the -- that the system had
7 generated the reversal at the time. So I think that,
8 for me, was important, that we understood that at the
9 time, so that the postmaster knew what that ID was
10 against and what it wasn't.

11 **MR MOLONEY:** Thank you very much, Mrs van den Bogerd.

12 **SIR WYN WILLIAMS:** Thank you, Mr Moloney.

13 Who is taking the 10-minute slot, first, Mr Beer?

14 **MR BEER:** It's Ms Watt on behalf of the Federation.

15 **Questioned by MS WATT**

16 **MS WATT:** Thank you, sir.

17 Good afternoon, Ms van den Bogerd. I appear for the
18 National Federation of SubPostmasters at this Inquiry.

19 I just wanted to look first at your career at the
20 Post Office. You set out at paragraph 9 of your witness
21 statement what that was and some of it involved
22 operational responsibility for post offices and
23 interviewing and appointing subpostmasters; is that
24 correct?

25 **A.** Sorry, yes. Can you tell me what year that was, so

140

1 I understand the role?
 2 **Q.** Would it be fair to say that, over the period 1996 to
 3 2006, that you had direct experience of the
 4 subpostmaster network, how it operated and how
 5 subpostmasters operated?
 6 **A.** That's correct.
 7 **Q.** In particular, between 1996 and 2001, you were
 8 interviewing and appointing subpostmasters, so it would
 9 be correct to say that this involved you in a direct
 10 assessment of the suitability to of an individual to be
 11 appointed by the Post Office as a subpostmaster?
 12 **A.** That's correct.
 13 **Q.** It would be important that those people were of good
 14 character, reliable, personable, honest, wouldn't it?
 15 **A.** Yes.
 16 **Q.** So you would likely agree with Sir Anthony Hooper of the
 17 Working Group when he said in evidence to the Inquiry
 18 recently that:
 19 "I felt throughout the Post Office cases that it
 20 didn't make sense that reputable postmasters appointed
 21 by the Post Office after examination of their
 22 characters, that they were stealing these sums of
 23 money."
 24 Would you agree with that assessment?
 25 **A.** So I remember him saying that, yes.
 141

1 recovery of monies did continue, yes.
 2 **Q.** It might be said, Ms van den Bogerd, that your evidence
 3 here is an example of there are none so blind as though
 4 who will not see, as the biblical reference puts it:
 5 "Those who have eyes and see not, those who have
 6 ears and hear not."
 7 You would not see, you would not hear, would you?
 8 **A.** Not intentionally. I mean, I would never have done that
 9 intentionally but I do accept that there are things that
 10 I have missed over that length of period and things that
 11 I would look at differently now, knowing what I know
 12 now.
 13 **Q.** Well, the truth is, Ms van den Bogerd, that approach by
 14 you was just simply wilful, wasn't it?
 15 **A.** No.
 16 **Q.** Because the truth also is, is it not, as articulated by
 17 Lord Arbutnot at the Inquiry:
 18 "They [the Post Office] were worried Second Sight
 19 was actual uncovering something really crucial about
 20 Horizon and, if they allowed it to carry on uncovering
 21 these things, it posed an existential threat to Horizon
 22 and, in turn, in the Post Office."
 23 **A.** That's not the case.
 24 **Q.** That is why you gave the much-criticised evidence at the
 25 Common Issues Trial before Mr Justice Fraser, to protect
 143

1 **Q.** Would you agree it didn't make sense that those
 2 otherwise honest and reliable postmasters were doing so?
 3 **A.** No, I wouldn't agree entirely with that and my reason
 4 for that is I had direct experience of reputable
 5 postmasters, actually, where I would call being a victim
 6 of circumstances and actually stealing from Post Office,
 7 and prior -- and that would be prior to Horizon.
 8 So that was my personal experience and, as I said
 9 yesterday, my view was that postmasters did not come
 10 into the Post Office to steal money or defraud.
 11 However, unfortunately, on some situations, that was
 12 true, it did happen.
 13 **Q.** The evidence here yesterday and today concerning your
 14 involvement shows that there were many, many occasions
 15 on which you were made aware of issues, including bugs,
 16 remote access, Gareth Jenkins, Ferndown post office, the
 17 case of Martin Griffiths, to name just a few, but you
 18 let prosecutions and financial recoveries carry on
 19 regardless, didn't you?
 20 **A.** Prosecutions -- when I became aware of some of those
 21 cases, prosecutions weren't happening very often then,
 22 but I wasn't involved in prosecutions. Recovery of
 23 monies did continue and I'm not sure at what point.
 24 I mean, we did stop recovering when we were
 25 investigating some cases, I think, but, in general, the
 142

1 the Post Office against that existential threat, wasn't
 2 it?
 3 **A.** So that wasn't my intention.
 4 **Q.** That is why the truth is, over many years, Ms van den
 5 Bogerd, you were actually responsible for or complicit
 6 in ensuring that everyone who you and the Post Office
 7 needed to keep on side was lied to consistently, weren't
 8 you?
 9 **A.** No.
 10 **Q.** That you were responsible for, or complicit in, the lie,
 11 that there was nothing wrong with Horizon, being fed, on
 12 every possible occasion, to MPs, government ministers,
 13 civil servants, the NFSP, unions such as the CWU, the
 14 courts, Second Sight, the Working Group, and media
 15 outlets such as the BBC, Channel 4, Computer Weekly,
 16 Nick Wallis, and anyone else who ever asked, weren't
 17 you?
 18 **A.** No.
 19 **Q.** The truth is, Ms van den Bogerd, isn't it, that it was
 20 absolutely necessary that all those people and
 21 organisations believed that lie in order to keep them on
 22 side. Nothing to see here, as Mr Beer put it, to avoid
 23 the existential crisis Lord Arbutnot referred to, isn't
 24 it?
 25 **A.** No.
 144

1 **MS WATT:** Thank you. That's me, sir.
 2 **SIR WYN WILLIAMS:** Thank you.
 3 **MR BEER:** Sir, in fact, I think we can fit in Ms Oliver.
 4 **SIR WYN WILLIAMS:** Ms Oliver, as well, if she's prepared to
 5 jump to her feet.
 6 **MR BEER:** She indicated that she is.
 7 **SIR WYN WILLIAMS:** I don't mean literally, I hasten to add.

8 **Questioned by MS OLIVER**

9 **SIR WYN WILLIAMS:** You can see each other properly, can you?
 10 **MS OLIVER:** We can broadly.

11 Ms van den Bogerd, I ask questions on behalf of
 12 Gareth Jenkins.
 13 I just want to pick up a point that Mr Beer and
 14 Mr Moloney have already asked you about which means that
 15 I can happily be very quick in the question that I want
 16 to ask you. It concerns the Lepton issue and the issue
 17 that was raised by Helen Rose with you in email
 18 correspondence that we've seen from 2013.

19 If we can please go to that email correspondence,
 20 it's POL00097480, please. Thank you. If we can go to
 21 page 5 of that string, please.

22 Just to orientate ourselves, this is the
 23 conversation about whether the fact that a reversal of
 24 a transaction was system generated or user generated is
 25 clear in either the Credence data or on the ARQ

1 Horizon does as I fully believe that it is working as it
 2 should, it is just that I don't think that some of the
 3 system-based correction and adjustment transactions are
 4 clear to us on either Credence or ARQ logs."

5 Then if we can please go up to Mr Jenkins' response
 6 just above this. He responds to that email:

7 "Helen,
 8 "I understand your concerns.
 9 "It would be relatively simple to add an extra
 10 column into the existing ARQ report spreadsheet. That
 11 would make it clear whether the reversal basket was
 12 generated by recovery or not. I think this would
 13 address your concern.

14 "I'm not sure what the formal process is for
 15 changing the report layout.

16 "Penny [that's Penny Thomas] can you advise as to
 17 the process: is this done through CR?"

18 Do you understand "CR" to mean change request?

19 **A.** Yes, I do.
 20 **Q.** We don't need to go to it but Penny Thomas confirms that
 21 that is the process.

22 So is it right that what we're seeing here is
 23 Mr Jenkins telling Helen Rose, and then that information
 24 being relayed to you, that there is a process by which
 25 the ARQ spreadsheet could be amended and that that

1 spreadsheets that could be extracted from the Horizon
 2 system.
 3 So here we have an email from Helen Rose to Gareth
 4 Jenkins on 7 February 2013:

5 "Hi Gareth
 6 "I have received the ARQ logs today and I can see
 7 clearly the recovery session. Could you tell me if this
 8 would always be available on all ARQ logs requested or
 9 is it something you requested especially for me after
 10 being aware of the issue at this office?"

11 If we can then scroll up, please, to page 3, Gareth
 12 says that he is going to look at the logs from Penny
 13 Thomas. He provides some explanation that you've
 14 already been taken to. If we can then, please, go up
 15 a little bit further.

16 Thank you. Just pausing there. This is the email
 17 you looked at earlier this afternoon where she thanks
 18 him for his response and expresses the concern that the
 19 ARQ logs used in evidence may not contain this
 20 information. Do you agree that's the concern being
 21 expressed here?

22 **A.** Yes, I do.

23 **Q.** Thank you. Then, just the final paragraph of this
 24 email:

25 "My feelings at the moment are not questioning what

1 process is relatively simple?

2 **A.** Yes.

3 **Q.** Is your evidence that, notwithstanding the availability
 4 of that process and its relative simplicity, that that
 5 process was never undertaken?

6 **A.** I don't know whether it was. When I was asked in court
 7 by Justice Fraser I said I didn't know, I didn't think
 8 it had been implemented. I have, through this
 9 disclosure process, seen something, and I can't recall
 10 exactly what, where that was listed as an improvement
 11 but I don't know whether it's actually ever been
 12 implemented or not.

13 **MS WATT:** Thank you very much, those are my questions.

14 **SIR WYN WILLIAMS:** Right, well we'll have our afternoon
 15 break now.

16 What's the time now?

17 **MR BEER:** It's 2.45, sir.

18 **SIR WYN WILLIAMS:** So we'll begin again at 2.55, and
 19 Mr Stein will draw us to a conclusion by 3.40. Thank
 20 you.

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

22 (2.45 pm)

23 (A short break)

24 (2.54 pm)

25 **Questioned by MR STEIN**

1 **MR STEIN:** Sir, thank you.
 2 Good afternoon Mrs van den Bogerd. My name is Sam
 3 Stein, I represent a large number of
 4 subpostmasters/mistresses and employed people working
 5 within branches.
 6 Subpostmasters and mistresses were repeatedly told,
 7 when contacted in the helpline, that they had to make
 8 good the shortfalls. They were told that, despite the
 9 fact that the subpostmasters and mistresses were saying,
 10 "We don't know what's wrong, it's not our fault, we
 11 didn't do this, this isn't down to me".
 12 Who told the helpline staff that that's what they
 13 must say to subpostmasters?
 14 **A.** That would have come through their knowledge --
 15 **Q.** Keep your voice nice and loud, please.
 16 **A.** Sorry.
 17 **Q.** It's towards the end of the afternoon. I think in the
 18 High Court trial you were asked by the learned judge
 19 there to keep your voice up at the end of day. So let's
 20 try that, please?
 21 **A.** Okay, so it would be whatever would be in their
 22 Knowledge Base, so that would be what they would have in
 23 terms of advice to be given.
 24 They would also have in there, if the postmaster
 25 needed assistance, they could refer that as well, so it
 149

1 43 per cent of those Core Participants have been told by
 2 the helpline that they've just got to pay up, "It's your
 3 shortfall, you know us the money", and 48 per cent were
 4 told that, "You are only the one." That's very high
 5 numbers of people contacting the helpline, being told,
 6 "You've got to pay up for a shortfall, it's down to
 7 you", and, secondly, "You're the only one saying there's
 8 a problem within the system".
 9 That's a lot of people, isn't it? High percentage,
 10 isn't it, Mrs van den Bogerd?
 11 **A.** Off the numbers you just quoted, yes.
 12 **Q.** Now, what's going on here is fraud, isn't it? The Post
 13 Office is saying to people who are saying to them
 14 there's a problem, there's a shortfall, trying to get
 15 help from the helpline, they are being told by the
 16 helpline "Pay up, it doesn't matter that you're saying
 17 it's someone else's fault"; that's fraud, isn't it?
 18 **A.** So, as I said, it depends on what the detail of that
 19 conversation would be and, depending on that, it might
 20 be that the helpline had asked for somebody to go out
 21 and visit them and help them but I don't know, in terms
 22 of specific cases that you're talking about.
 23 **Q.** What do you mean "it depends", Mrs van den Bogerd?
 24 Sometimes it's fraud and sometimes it isn't; is that
 25 what you're trying to say, Mrs van den Bogerd?
 151

1 depended on what the detail of that conversation would
 2 have been.
 3 **Q.** In the Knowledge Base. Put that into language that we
 4 understand. What do you mean by the mean by the
 5 Knowledge Base?
 6 **A.** So Knowledge Base is a library of information from which
 7 they draw on in relation to particular queries. So it
 8 would be the source information that they would need to
 9 use.
 10 **Q.** Would these be the scripts that they would use in order
 11 to answer questions being raised at the helpline?
 12 **A.** Some people refer to them as scripts. That's not what
 13 they're intended to be but it is where the knowledge
 14 source is.
 15 **Q.** Right, other terms we've heard or a similar one to the
 16 one you're using is "knowledge article"?
 17 **A.** That would be the same thing, yes.
 18 **Q.** All right. Now, subpostmasters were also told by the
 19 helpline that they were the only one, in other words
 20 that they were the only subpostmaster or mistress that
 21 was saying there's a problem with the system. Would
 22 that also be in the Knowledge Base?
 23 **A.** No. I've heard that over the years being made but I've
 24 never seen that anywhere.
 25 **Q.** Well, of 102 Core Participants represented by Howe+Co,
 150

1 **A.** I'm not saying it's fraud at all.
 2 **Q.** All right. Well, let's test what you appear to be
 3 saying. The evidence you've given in answers to Mr Beer
 4 yesterday was that it was understood within the Post
 5 Office that shortfalls were down to the subpostmaster or
 6 mistress, that they had to pay. Let's see if we can
 7 test that.
 8 So you get a subpostmaster or mistress in a small
 9 local branch office with a shortfall of 50 grand,
 10 £50,000, and there's no proof, absolutely no proof that
 11 they're responsible for that £50,000 shortfall. Yet
 12 they're being blamed by the Post Office and told "You've
 13 got to pay up nevertheless"; is that fair in any way,
 14 Mrs van den Bogerd?
 15 **A.** I would expect to be able to investigate that to see if
 16 we could get to the bottom of what had happened to that
 17 money but, over the years, that facility wasn't there.
 18 **Q.** Right. Let's just talk about it right now. Do you
 19 regard that situation, where subpostmasters and
 20 mistresses were being told to pay up for very large sums
 21 of money, something of the order of 50,000, it could be
 22 tens of thousands or it could be more. Do you, sitting
 23 there today, regard that as being fair?
 24 **A.** No, I haven't worked in the Post Office for over four
 25 years. My expectation would be that they would get some
 152

1 help to see if they could understand where that shortage
 2 had come from.

3 **Q.** Now, this entire area, which is people evening told to
 4 pay up for shortfalls regardless of fault, you said in
 5 your evidence yesterday that this had been checked with
 6 Legal, it had been approved with people at Legal. Now,
 7 you seemed to be explaining that that was something that
 8 you were aware of in 2011, about the time of the
 9 Shoosmiths case. You went on to say yesterday, in
 10 relation to who it might be at Legal, you named these
 11 names: Mandy Talbot, Rebekah Mantle and probably Rob
 12 Wilson.

13 **A.** Mm-hm.

14 **Q.** So let's try and understand a bit more about what you're
 15 saying about this. Are you saying in 2011 that the
 16 Legal Team people told you that it's okay, you can blame
 17 postmasters for anything because they have to pay; is
 18 that what you're trying to tell us?

19 **A.** No.

20 **Q.** Right. So what was the advice from the legals?

21 **A.** So what I'm saying is that the policy approach was
 22 approved by the Legal Team, which was that postmasters
 23 were liable under the terms of their contract for errors
 24 due to their negligence -- and I forget -- I mean, it's
 25 been quite some time now but it was set out in the

153

1 of POL's support services. Okay?

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

3 **Q.** All right. Now, I've asked you a number of questions
 4 about knowledge articles, you've helped us by calling
 5 them -- referring to a Knowledge Base. Where are those
 6 knowledge articles, these scripts, saved? Where are
 7 they, Mrs van den Bogerd?

8 **A.** Within NBSC.

9 **Q.** Right. Are they saved on a particular system?

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

11 **Q.** Well, you were in charge of the helpline, so I'm hoping
 12 that you do know something about these?

13 **A.** So I don't know what system they were stored on. They
 14 are stored and they -- that would have changed. It
 15 would have been with Royal Mail up until 2012 and then
 16 it transferred into Post Office but I don't know what
 17 system they were stored on.

18 **Q.** Now, on 25 May 2010, Jennifer O'Dell, who had been
 19 a subpostmistress at Great Staughton, Cambridgeshire,
 20 since November 2000, was interviewed by Jonathan
 21 Longman. Now, Mrs O'Dell is watching these proceedings
 22 from her bed. She's watching it on tablet because she
 23 is suffering from gastroenteritis, so she is very much
 24 paying attention to these proceedings.

25 Now, in her discussions that she had in her

155

1 contract. Any dispute around whether a contract should
 2 be terminated on the basis of that or not would be done
 3 with the policy advice from Legal Team. That's how the
 4 policy was set out. And not just in 2011, that's my
 5 understanding of how things operated over the years.

6 **Q.** Right. Well, the term of the contract, that you
 7 referred to yesterday, was this: that the subpostmaster
 8 is responsible for all losses caused through his on
 9 negligence, carelessness or error.

10 **A.** Yes.

11 **Q.** Okay? Right. So I've helped you with the wording.
 12 That wasn't what was happening at the Post Office, was
 13 it? You know that subpostmasters were being told to pay
 14 up, irrespective of fault. You know that, don't you
 15 Mrs van den Bogerd?

16 **A.** So it would have been in line with the contract, that
 17 was my expectation. The helpline were telling them that
 18 they were liable for losses but that would have been, at
 19 that point, referred to their Contracts Adviser if that
 20 needed a further conversation.

21 **Q.** Now, in your statement, you say this: that in relation
 22 to your time at the Post Office, that from January 2015
 23 to December 2016 -- this is your statement,
 24 paragraph 9(k) at page 6 -- you were responsible for the
 25 NBSC, the postmaster helpline, as you were the director

154

1 interview with Mr Longman, the Investigator, she made it
 2 very clear that he had been ringing up the helpline
 3 asking for help, she wanted somebody to come out and see
 4 or somebody to start taking action, and she was told,
 5 only by the helpline, that she'd got to make it good, in
 6 other words she'd got to make the shortfall good. Now,
 7 do you understand what I've just said?

8 **A.** Yes.

9 **Q.** That's what Mrs O'Dell was going through. Do you think
 10 she wasn't telling the truth about that?

11 **A.** No.

12 **Q.** Right. Can we have up on screen, please, the document
 13 which is POL00143567. Now, that's the interview with
 14 Mrs O'Dell, Mr Longman, where she sets that out, and she
 15 sets out in that interview repeatedly what's going on.
 16 I'm now going to take you to the investigation report,
 17 which is POL00189165. Can you go to page 3 of that
 18 document, please.

19 You'll see there, at the bottom part on the screen,
 20 it says, and I'll paraphrase: In relation to 4 August
 21 2009, Mrs O'Dell said that she'd contacted the Post
 22 Office helpline and reported she had ongoing
 23 discrepancies and wanted assistance.

24 Okay?

25 Now, further down the page, to the second half of

156

1 page 3, please. Okay. You'll see there, I think it's
 2 the fourth paragraph down from the top:
 3 "Mrs O'Dell continued to make further calls to the
 4 helpline with regards to the shortage at they are
 5 recorded as follows ..."
 6 All right?
 7 It says this:
 8 "23 October 2009 -- could someone ring PM as she
 9 needs to discuss the PIN pad with them as she's been
 10 having a few problems with this and thinks it's causing
 11 the office a discrepancy. Needs to discuss this in
 12 private.
 13 "4 November 2009 -- office has a loss of £7,000
 14 she's been carrying this since May, refused to make it
 15 good as she said it's not her loss. Emailed NSA but PM
 16 wants a callback from Tier 2.
 17 "5 November -- spoke to Mrs O'Dell today, office has
 18 a loss of £7,000. She's been carrying this loss since
 19 May. Explained to PM that this loss should have been
 20 made good when she has been rolling her TP but she
 21 refuses to make it good as she said the loss is not
 22 hers.
 23 "5 November 2009 -- subpostmaster reports having
 24 £1,000 loss a month since May now totalling £7,000 ...
 25 she refuses to make good as she blames the system for
 157

1 **Q.** But that's wrong, isn't it, as against the contract?
 2 **A.** Yes, well -- what I would have expected here is, even at
 3 the first call, she should have had a callback and it
 4 should have been escalated to -- and I think it was
 5 still in place then -- the Tier 2, so they had your
 6 basic helpline and then they should have escalated it to
 7 Tier 2. Every time she's called in, they should have
 8 been able to see what had been said to her previously
 9 and it should have been escalated.
 10 **Q.** Now, you were present at the High Court action. You
 11 were there, I think, on virtually every day of the High
 12 Court action. That's what people recall.
 13 **A.** Yeah.
 14 **Q.** You were there on every day of the action with an iPad
 15 that had been given to you by the POL Legal Team, and
 16 you were there and observed watching and taking part in
 17 the proceedings very closely; is that fair?
 18 **A.** When you say the iPad, do you mean to be able to watch
 19 the screen.
 20 **Q.** What was going on, yes?
 21 **A.** Yes.
 22 **Q.** You recall there was other evidence being given in the
 23 High Court about people that were sent letters saying
 24 basically the same as the helpline, in other words pay
 25 up for the shortfall; you recall that, don't you?
 159

1 the losses.
 2 "She has done many checks and cannot find anything
 3 and not had corrections. Subpostmaster insisting on
 4 escalating."
 5 Now, how many people, roughly, were employed at the
 6 helpline?
 7 **A.** In 2009, probably, I'd guess, about 50.
 8 **Q.** So Mrs O'Dell has phoned up and probably spoken to
 9 different helpline people at the time. She'd have been
 10 lucky to have spoken to the same person twice, okay?
 11 This is an investigation report written by Jon Longman,
 12 the Investigator, setting out what he has found as
 13 regards what she has been told by the helpline. Okay?
 14 **A.** Yes.
 15 **Q.** Right. Now, do you see anything wrong with what the
 16 helpline is repeatedly telling Mrs O'Dell?
 17 **A.** Yes, and it should have been escalated.
 18 **Q.** Right. Instead, what was happening was that she was
 19 being told basically to shut up, pay the money. That's
 20 roughly what was being said, wasn't it?
 21 **A.** She was being told it was her liability to make it good.
 22 **Q.** Say it a bit louder, would you, please, Mrs van den
 23 Bogerd?
 24 **A.** Sorry, she was being told it was her liability and she
 25 should be making it good, yes.
 158

1 **A.** Not specifically.
 2 **Q.** Now, when you think about it, Mrs van den Bogerd, what
 3 we've got here is a helpline that is being pushed by the
 4 scripts to tell the people in the branch offices that
 5 they need to pay up for shortfalls. That's being
 6 orchestrated by the Post Office, isn't it?
 7 **A.** It would have been part of the scripts to say that the
 8 postmaster was liable for the losses, yes, it would have
 9 been.
 10 **Q.** You see, Mrs O'Dell has lived in Great Staughton for
 11 over 50 years. What happened to her was that people
 12 would cross the road and avoid her once publicity got
 13 out from the Post Office in relation to her. She
 14 suffers post-traumatic stress disorder, she can't sleep,
 15 she has night terrors. That's what's happened.
 16 Now, you refer to her in your statement, don't you?
 17 **A.** I do, yes.
 18 **Q.** You know that she says and has said in her Human Impact
 19 statement that, when you engaged with her on one
 20 occasion, she says that you were intimidating and
 21 bullying towards her, telling her that she had stolen
 22 the money and, if she didn't, Post Office would take her
 23 home away. Now, you say in your statement that you
 24 didn't behave that way?
 25 **A.** Yes, that's true. I didn't.
 160

1 **Q.** Let's think about this, Mrs van den Bogerd. You were
 2 Post Office through and through, like a bad stick of
 3 rock with "POL" in the middle of it, weren't you,
 4 Mrs van den Bogerd? You carried the Post Office line,
 5 the Post Office line was that subpostmasters and
 6 subpostmistresses had to pay up for shortfalls. That's
 7 what you were saying to her, that's why she felt
 8 intimidated; isn't that true, Mrs van den Bogerd?
 9 **A.** No, I never said that to Mrs O'Dell. I met Mrs O'Dell
 10 on two occasions, one in London in -- I think it was
 11 Portcullis House, with her MP in the room, and myself
 12 and a few other people. That conversation did not take
 13 place then. And the second time I met Mrs O'Dell was in
 14 the Mediation Scheme when I was mediating her case and,
 15 again, there were five of us in the room, including her
 16 legal representative from Howe+Co, and that conversation
 17 did not happen, and what I'm saying is I believe she's
 18 mistaken. If she did have that conversation, it wasn't
 19 with me.
 20 **Q.** Well, let's give this a little bit more thought.
 21 Mr Justice Fraser, now Lord Justice Fraser, stated, as
 22 regards you -- and I'll read out the quote that relates
 23 to you:
 24 "Unless I state to the contrary, I would only accept
 25 the evidence of Mrs van den Bogerd and Mr Beal in
 161

1 an investigation into this? They must have looked into
 2 this, did they?
 3 **A.** No.
 4 **Q.** No? There was no discussion with you about "Well, hang
 5 on, that High Court Judge, you know, said some pretty
 6 rum things about you, surely we should take this
 7 seriously?" Nothing like that, nothing ever done?
 8 **A.** No.
 9 **Q.** All right. Did you get your bonus that year in 2019,
 10 Mrs van den Bogerd?
 11 **A.** Yes.
 12 **Q.** I see. So, despite a finding in the High Court that,
 13 basically, you lied to the High Court, you got your
 14 bonus?
 15 **A.** Yes.
 16 **Q.** Now, how were the people on the helpline trained so that
 17 they were so consistently pressing the subpostmasters
 18 for payments? How was that done? How did you and
 19 others manage to persuade them that you've really got to
 20 do this? Did you have away days, training sessions,
 21 evening sessions, things like that?
 22 **A.** No, they had their training when they came into the role
 23 and they had ongoing training throughout.
 24 **Q.** What do you think was going on domestically with the
 25 subpostmasters and mistresses and their situation? Do
 163

1 controversial errors of fact in issue in this Common
 2 Issue trial, if these are clearly and incontrovertibly
 3 corroborated by contemporaneous documents."
 4 Now, that's a High Court Judge version of saying, if
 5 you told him it was a sunny day, he'd go outside and
 6 check for himself. Now, does that help us understand
 7 that, where there's a clash of evidence between you,
 8 Mrs van den Bogerd, and Mrs O'Dell as to what's
 9 happened, we might just think that Mrs O'Dell should be
 10 believed?
 11 **A.** You might do but it's not true; I know that didn't
 12 happen and there were other people in the room on both
 13 of those occasions and, had anything like that happened,
 14 they would have raised it at the time.
 15 **Q.** Now, what was said about you by Mr Justice Fraser was
 16 pretty serious, isn't it? It's condemning you,
 17 absolutely out of hand, as being someone that simply he
 18 can't trust and he is someone that's evaluated your
 19 evidence over quite some time in the witness box; it's
 20 pretty serious thing to hear about yourself, isn't it?
 21 **A.** Yes.
 22 **Q.** Okay. The Post Office obviously was aware of what was
 23 being said about you, yes?
 24 **A.** Yes.
 25 **Q.** Yes, okay, fine. What did the Post Office do by way of
 162

1 you think that when they were being told to find large
 2 sums of money like that, that they rested well?
 3 **A.** Clearly not.
 4 **Q.** No. You understand from the evidence that has been
 5 given in these proceedings that subpostmasters and
 6 mistresses would try and find money to pay, they would
 7 sometimes borrow from family, from friends, loan sharks,
 8 even memorably, on one occasion -- probably more than
 9 one occasion -- taking money from the kid's piggy bank.
 10 That's what was going on, Mrs van den Bogerd. You've
 11 not taken responsibility for very much, if anything at
 12 all, in this Inquiry. Do you want to take any
 13 responsibility for being part of the Post Office actions
 14 in doing so?
 15 **A.** I've explained what my roles were. I've said that there
 16 are some documents that I've missed and I wish I hadn't,
 17 and I -- and I would have looked at things differently
 18 knowing what I know now.
 19 **Q.** Let's have another look, though, let's have another
 20 think about what this did within the Post Office and
 21 what it did to the Post Office's investigation of
 22 difficulties with the Horizon system.
 23 So we can see that the helpline was part of the Post
 24 Office's pay-up principle, the penalty pay-up principle:
 25 you've got to pay, we're not accepting criticisms of our
 164

1 wonderful Horizon system, okay?
 2 What do you think that will have done to the
 3 reporting of faults in relation to the Horizon system?
 4 Do you think it would have been a good idea or a bad
 5 idea?
 6 **A.** Sorry, I don't understand what you mean.
 7 **Q.** Right, if people are being told to pay up when they're
 8 trying to say, "There's something wrong with your
 9 system", does that help identify faults in the Horizon
 10 system?
 11 **A.** No.
 12 **Q.** No, it doesn't --
 13 **A.** As I said, I would have expected them to have been
 14 escalated, for them to be offered some help in finding
 15 the losses.
 16 **Q.** That is what was going on, Mrs van den Bogerd?
 17 **A.** Well, it -- I mean, it was in some cases. There are --
 18 there's evidence of people did get help and did get
 19 assistance in branch. What I'm saying is what should
 20 have happened in the case of Mrs O'Dell is that it
 21 should have been escalated and she should have got some
 22 assistance.
 23 **Q.** Mrs van den Bogerd, you do listen to things
 24 occasionally, don't you? I've explained already that of
 25 102 people, over 40 per cent of people that were using
 165

1 helpline system stopping this misinterpretation of the
 2 contract, stopping the fraudulent line being taken by
 3 the Post Office that they had to pay up? Who should
 4 have been the title of the person in charge of that part
 5 of the system?
 6 **A.** So the Knowledge Base information came from the relevant
 7 product or function owners, so NBSC would pull the
 8 information from the relevant section. It wouldn't be
 9 compiled -- compiled by NBSC, it would be compiled by
 10 other people around the organisation. So, in terms of
 11 that particular question, it should have been through
 12 Contracts and/or Legal, in terms of was that information
 13 that they had on the Knowledge Base correct, in terms of
 14 what they were giving to postmasters.
 15 **Q.** Right, let's help in a slightly different way: should it
 16 have been the Chief Operating Officer that was in charge
 17 of making sure there was oversight of what the product
 18 was, in other words what was being said in the helpline?
 19 Should it have been the CEO? Should it have been
 20 a particular director? Who should it have been within
 21 management that was governing that aspect?
 22 **A.** It should have been whoever the Executive Director was
 23 at the time and it changed -- the structure changed
 24 several times, so it would have been the Chief Operating
 25 Officer at some point, it would have been the CFO at
 167

1 the helpline were told "Pay up, don't worry about what
 2 you're saying about the system". Now, we can't
 3 replicate everybody working in the Post Office over
 4 these many years but there's likely to have been a very
 5 significant number of people who were told to basically
 6 pay up, "We're not listening to you complaining about
 7 the faults". That would not have helped the
 8 investigation of issues with the Horizon system; do you
 9 agree?
 10 **A.** I agree.
 11 **Q.** Because it means that when passing on problems that were
 12 being experienced by subpostmasters, those problems
 13 weren't getting to Fujitsu, were they, Mrs van den
 14 Bogerd?
 15 **A.** I agree, and postmasters telling us they were having
 16 problems and us being able to investigate them or
 17 passing to Fujitsu would have really helped.
 18 Unfortunately, in many cases, we weren't being made
 19 aware that there were problems and they were covering
 20 losses in a number of cases and that didn't help us
 21 either. So --
 22 **Q.** Right, you can have your nice falling out with Fujitsu
 23 as much as you like, Mrs van den Bogerd. Let's try and
 24 think about where the governance lay in relation to the
 25 helpline system. Who should have been in charge of the
 166

1 some point. It changed over the years and I don't know
 2 who it would have been in 2009.
 3 **Q.** Now, over of the period of many years that the Post
 4 Office was operating the Horizon system, there came
 5 a point in the early '00s where what was going on was
 6 that the Post Office was having to target the closure of
 7 branch offices; do you agree?
 8 **A.** There were several programmes of closure, yes.
 9 **Q.** Yes, right. Now, were there, for the Area Branch
 10 Managers -- at one time you were one of those -- were
 11 there targets in relation to branch closures? In other
 12 words, it would be very helpful if you could achieve 20,
 13 30, 40, 100 closures?
 14 **A.** Not at the local level, no.
 15 **Q.** What about at the more senior level? Were there
 16 targets?
 17 **A.** So as part of -- there were three programmes I remember:
 18 Network Change, Network Reinvention and Network
 19 Transformation. They were all targeted at reducing
 20 branches but they were run as programmes with
 21 compensation.
 22 **Q.** Well, there was compensation for branches that were
 23 closed by agreement. So --
 24 **A.** Yes.
 25 **Q.** -- the compensation might be a year or two's pay or
 168

1 a particular period, you agree?
 2 **A.** I agree.
 3 **Q.** Now, if a branch was closed as a result of an audit, so
 4 someone not being able to pay a shortfall and,
 5 therefore, targeted for a civil action or, worse,
 6 prosecuted, they didn't have to pay the subpostmaster or
 7 mistress, did they?
 8 **A.** No.
 9 **Q.** No. If a branch was closed in a small local community
 10 area and it was closed because a subpostmaster or
 11 mistress was being blamed by the Post Office, then
 12 that's helpful to the Post Office, isn't it, because
 13 local people then can't complain it's the Post Office's
 14 fault because it's the subpostmaster?
 15 **A.** That wouldn't have been helpful because we would have
 16 looked to re-establish that provision in the area at
 17 that point. We had certain access criteria that we had
 18 to comply with from Government.
 19 **Q.** If the branch was closed because of an audit and because
 20 people can't pay their shortfall that they're being told
 21 that they must pay, or they're prosecuted, the Post
 22 Office can try and recover, as they did on many
 23 occasions, money through the civil courts or the criminal
 24 courts. So in that case, they get a branch closed,
 25 without having to pay compensation, and they get money

169

1 integrity of the Horizon system ..."
 2 Okay?
 3 **A.** Yes.
 4 **Q.** "... and I believe that when I took over the
 5 responsibility for the Contract and Administration Team,
 6 I became aware of claims that the Horizon system itself
 7 was generating the discrepancies in branches."
 8 All right?
 9 Now, in your statement at page 6, paragraph 9(k) --
 10 I'd rather have this on the screen, please, I'll read
 11 out the relevant part I'm about to refer to -- it says
 12 this that, between 2015 and 2016, you were Director of
 13 Support Services and then you were also managing the
 14 Contract Advisers and Contract Administration Teams.
 15 Now, just help us please understand what you're
 16 saying it about when it was you became aware of the
 17 rumblings and complaints and concerns about the
 18 integrity of the Horizon system? It doesn't seem to
 19 have been 2015, when you were managing the Contract
 20 Advisers and Contract Administration Team.
 21 **A.** So I managed them in 2011, as well. So they -- the
 22 contracts -- I managed them in different times, so
 23 they -- I took on responsibility for Lin Norbury and
 24 John Breeden, who headed up the team in 2011. I then --
 25 I'm sorry, I'm going to have to refer to my statement in

171

1 back from the shortfall that wasn't the subpostmaster's
 2 fault; that's true, isn't it? That's what was going on?
 3 **A.** No.
 4 **Q.** Did you get a bonus at a certain level for achieving
 5 your targets in relation to branch closures?
 6 **A.** When I was part of the Network Change Programme, I would
 7 have had an objective link to that but it was part of
 8 the programme. Other than that, my targets would have
 9 been related to maintaining the size of the Network or
 10 increasing it because that was some of the roles that
 11 I was in previously. So quite the opposite of what you
 12 just described.
 13 **Q.** Well, it doesn't sound like it's the opposite. As part
 14 of the bonus structure, in achieving the end result,
 15 which is closure of branches, there was some link to
 16 bonus; do you agree?
 17 **A.** Only as part of a programme my other roles, when I was
 18 part of the rural Network was to maintain the size and,
 19 if we had a closure, then to re-establish a service in
 20 that area.
 21 **Q.** Now, you say at paragraph 30 of your statement -- I'm
 22 going to take you to it, please, WITN09900100,
 23 paragraph 30, page 14, please:
 24 "Prior to this [you say], I was aware of general
 25 'rumblings' of complaints and concerns about the

170

1 terms of my -- the roles that I did, because I stepped
 2 out --
 3 **Q.** Page 5, you might find useful.
 4 **A.** Thank you.
 5 **Q.** If you're referring to the period of time, which is
 6 December 2010 to August 2012. That is --
 7 **A.** That is when I was Head of Network Services.
 8 **Q.** Right. So which year, during the different roles that
 9 you had within the Post Office, that you set out within
 10 your statement, are you saying you were aware of these
 11 rumblings?
 12 **A.** So that was -- what I'm saying is that, in 2011, when
 13 I took on the Contract Advisers Team as part of my role
 14 then, that's when I started to get involved in these
 15 cases, and that's when I was aware of Shoosmiths. Prior
 16 to that, I had been aware of some rumblings, and then,
 17 like I say, I got involved in 2011.
 18 **SIR WYN WILLIAMS:** Well, if can interject, unless my memory
 19 is failing me, I think Mr Beer showed you a document
 20 yesterday which put you on notice in 2004.
 21 **A.** So that was the Lower Eggleton case.
 22 **SIR WYN WILLIAMS:** Yes, and you accepted, I think, that that
 23 was at least a rumbling?
 24 **A.** So that was the provision of Horizon logs to the
 25 postmaster at the time, yes.

172

1 **MR STEIN:** Right. So, by the time you get to what seems to
2 be around 2010, you've got background rumblings; you've
3 got the build-up of what's going on; you've got the JFSA
4 being formed; you've got the incredibly brave Computer
5 Weekly publicising problems and complaints with the
6 Horizon system; you've got MPs talking about it, sending
7 in letters to the Managing Director and CEOs of the
8 company.

9 Now, there's a lot of rumblings going on here in
10 relation to the integral part of the Post Office system
11 that's called Horizon. This is a lot of rumblings; do
12 you not agree?

13 **A.** At around that time when I stepped into that role, yes.

14 **Q.** Yes. Now, this has got to be very worrying amongst
15 people working at the Post Office, that "This thing,
16 Horizon, which we all depend upon, everybody seems to be
17 saying that there's a real problem with it".

18 Do you not agree? These rumblings must have been
19 pretty worrying for people at the Post Office?

20 **A.** What I'm saying here, in terms of rumblings, that was my
21 recollection and it's only when I stepped into taking on
22 the responsibility for the Contracts Advisers Team that
23 I started to be exposed to that -- what you've just
24 described is when I started to be exposed to that.

25 And then, leading on from that, that's why I wanted
173

1 once these rumblings were getting louder and louder and
2 the crisis was getting ever more obvious and ever more
3 serious? Did the line from the helpline change? Did
4 you make sure that the helpline, or anyone make sure
5 that the helpline, still wasn't saying to these poor
6 people in the Post Office branches that they've got to
7 pay up regardless? Did anybody give that any attention,
8 Mrs van den Bogerd?

9 **A.** I did, yes. As part of the Branch Support Programme,
10 I brought in those changes. So on the back of Second
11 Sight's Interim Report, I set up the Branch Support
12 Programme, which was about making improvements to
13 a range of processes and working with subpostmasters,
14 and one of those was NBSC.

15 **Q.** Right. So that means you must have done a bit of
16 checking about what was going on at the NBSC to make
17 this make sense. You must have gone to them and said,
18 "Let's have a look at what you've been doing so far";
19 did you do that, Mrs van den Bogerd?

20 **A.** What I looked at was providing the support in NBSC that
21 meant that there was more Tier 2 support to be able to
22 deal with the escalations that you took me to in
23 Mrs O'Dell's case, for instance, so that we had better
24 support there. That's --

25 **Q.** So at around that time, are you trying to tell us that
175

1 to get involved in the initial investigations into the
2 cases and then the scheme.

3 **Q.** Mrs van den Bogerd, what we haven't seen at around that
4 time or, indeed, frankly, any time, is any documents
5 which say something along the lines of, "Gosh, maybe
6 there's a problem with the Horizon system. Imagine the
7 harm that we might be doing. Imagine what we're doing
8 to families, the mental health of our subpostmasters and
9 mistresses, the people working in those branches".

10 We don't see anything like that, Mrs van den Bogerd,
11 in relation to these rumblings that you're talking about
12 going on at that time. Is that because the culture of
13 the Post Office was all about the Post Office brand and
14 damn the subpostmasters?

15 **A.** No.

16 **Q.** What other explanation is there, Mrs van den Bogerd,
17 when we see a total absence of care about people with
18 families that you should be trying to protect, not
19 prosecute?

20 **A.** That's why we brought in Second Sight and that's why we
21 wanted to investigate the cases because, at that point,
22 it was evident that there were a number of people that
23 were claiming that the Horizon system was causing their
24 losses.

25 **Q.** Let's go back to the helpline. Did the message change
174

1 you saw that there were problems within the NBSC, that
2 there were people being told to pay up regardless, and
3 you then made a correction; is that what you're trying
4 to tell us?

5 **A.** I'm saying it was a broader improvement. So the Interim
6 Report --

7 **Q.** Could you cut the corporate speak? Could you just tell
8 us whether you tried to improve the problem which I've
9 discussed with you?

10 **A.** That was part of it. Yes, I did. I wanted --

11 **Q.** So you must have recognised that there was a problem in
12 the operation of the helpline at that time; is that
13 correct, Mrs van den Bogerd?

14 **A.** So I recognised that postmasters weren't getting -- and
15 I'm not saying in all cases but I'm saying in some
16 cases -- they weren't getting the level of support that
17 they should have had in relation to investigating their
18 discrepancies, and that's what I set to correct through
19 the Branch Support Programme, and then later, when
20 I took on responsibility for the NBSC, I continued with
21 those improvements.

22 **Q.** Okay. Now, what about a message being sent out to the
23 postmasters and mistresses? Was there a message sent
24 out at that time to say, "Look, we're beginning to think
25 there might be a bit of a problem, that there could be
176

1 a difficulty with shortfalls and you need to be on
 2 notice"? Did anybody provide them with a warning to
 3 say, "Look, there's a bit of an issue here"?

4 **A.** No.

5 **Q.** No. Jacqueline Falcon worked as a counter clerk at
 6 a post office branch in Hadston, Northumberland, between
 7 2000 and 2015. She got blamed by her employer for
 8 a shortfall. This policy was so embedded within the
 9 system that subpostmasters and mistresses would blame
 10 other people for losses. Mrs Falcon was arrested and
 11 charged with fraud. She was handed a three-month prison
 12 sentence suspended for three months. Shunned by the
 13 local community, barely able to leave her house, it has
 14 affected her pregnancy, she was put on anti-depressants
 15 during that time and, to this day, she still does not go
 16 into the Hadston Post Office branch.

17 Now, that was happening to her in 2014, and in
 18 February 2015 that's when she was arrested. Why didn't
 19 the Post Office send out a message to make sure that
 20 people were not being unnecessarily blamed for what
 21 might be, what could be, a problem within the system?
 22 No proof of if it at that point in your mind, it seems,
 23 but what could be a problem. Why wasn't that message
 24 sent out?

25 **A.** So the message we always gave then was, "If you have

177

1 Was that a deliberate strategy being employed by the
 2 Post Office, to try to outspend the GLO claimants?

3 **A.** Not that I was aware of.

4 **Q.** Mr Justice Fraser said, from his considerable
 5 experience, that, in relation to serious and difficult
 6 High Court actions, even as against other cases of
 7 a similar type, that the level and rate of expenditure
 8 in the GLO litigation was very high. That was
 9 a deliberate POL strategy, wasn't it?

10 **A.** I didn't think so at the time.

11 **Q.** Let's go to one last document, POL00006380. Can we go
 12 to the bottom half of page 2, which is paragraph 4,
 13 please. Thank you very much. We'll be looking at
 14 paragraph 4.3 in one moment. Now, this is a Bond
 15 Dickinson solicitors document written requesting
 16 instructions on the strategy to be taken. So let's just
 17 look at this before I finish. Paragraph 4.3:

18 "... believe that the better solution is to try to
 19 focus the claimants into a collective position where
 20 they will either have to abandon the claims or seek
 21 a reasonable settlement. It should be remembered that
 22 the claims are financially supported by Freeths (whose
 23 fees are at least partially conditional on winning),
 24 a third party funder and insurers. Without support
 25 these proceedings would not have been possible. All

179

1 an issue, please ring, and we will help with getting to
 2 the bottom of it". That's what I put in place as part
 3 of the Branch Support Programme and when I was in
 4 Support Services. Earlier than that, then that level of
 5 assistance wasn't available.

6 **Q.** Ms van den Bogerd, in the High Court and regarding the
 7 High Court action, Mr Bates and other witnesses have
 8 stated that the Post Office was clearly trying to
 9 outspend and outdistance the GLO claimants. Was that
 10 the Post Office strategy?

11 **A.** That was my understanding of it.

12 **Q.** Three leading counsel were instructed over various
 13 times. Why so many?

14 **A.** Sorry --

15 **Q.** Three leading counsel, three QCs, at that time, were
 16 instructed.

17 **A.** So I was aware of two.

18 **Q.** Mr Justice Fraser said this, paragraph 58 of his
 19 judgment, in relation to the Horizon Issues Judgment,
 20 number 6:

21 "Over the numerous hearings and two full substantive
 22 trials I have conducted, I have gained the distinct
 23 impression that the Post Office is less committed to
 24 speedy resolution of the entire group action than are
 25 the complainants."

178

1 three entities will have the power to pull their support
 2 if the merits of the case drop below a certain level.
 3 Our target audience is therefore Freeths, the funder and
 4 insurers who will adopt a cold, logical assessment of
 5 whether they will get a payout rather than the claimants
 6 who may wish to fight on principle regardless of merit."

7 Now, this Bond Dickinson solicitors asking for
 8 instructions to agree with a strategy which is to drive
 9 the GLO claimants away from the court because they will
 10 not be supported by Freeths, the insurers or the
 11 third-party funders. That was a strategy that
 12 Mr Justice Fraser came to a conclusion that he could see
 13 in operation, couldn't he, Mrs van den Bogerd? That was
 14 the POL strategy, wasn't it?

15 **A.** That wasn't my understanding when we started in the
 16 litigation but, clearly, that's what was being proposed
 17 as we got into it. That wasn't --

18 **Q.** You said, in your evidence yesterday, you're always
 19 aware of the public purse as being something at play in
 20 relation to the Post Office, Mrs van den Bogerd. It's
 21 hardly the action of a company that's worried about the
 22 public purse, taxpayers' money, subpostmasters' and
 23 mistresses' money -- through branch and through hard
 24 work being put into the Post Office -- it's hardly
 25 expressing any concern, is it, about those worries,

180

1 about the public purse, to use Government money,
 2 subpostmasters' money, to try to drive them out of the
 3 court, is it, Mrs van den Bogerd?
 4 **A.** I was always concerned about taxpayers' money throughout
 5 the course of my time there and, as I said yesterday,
 6 one of reasons I decided to leave when I did was because
 7 I was disillusioned because there was more money being
 8 spent defending or trying not to pay out on the
 9 Historical Shortfall Scheme, than it was on paying out,
 10 and that was one of the reasons, so --
 11 **Q.** Every day you were at the court, sitting there
 12 supporting the action, were you telling the Legal Team,
 13 "Oh, I'm a bit worried about the public purse and how
 14 much we're trying to drive these poor people into the
 15 ground"? Was that your constant refrain, Mrs van den
 16 Bogerd?
 17 **A.** That wasn't the conversation. That was a conversation
 18 above me, not for me to have.
 19 **MR STEIN:** No further questions.
 20 **SIR WYN WILLIAMS:** Thank you. I think that concludes the
 21 questioning, Mr Beer?
 22 **MR BEER:** It does, sir.
 23 **SIR WYN WILLIAMS:** So first of all, thank you to all the
 24 representatives of Core Participants who have so
 25 scrupulously abided by my directions.

181

1 Thank you, Mrs van den Bogerd, for making a detailed
 2 witness statement and for answering very many questions
 3 over two days.

4 Right, Tuesday?

5 **MR BEER:** Tuesday at 9.45, please, sir.

6 **SIR WYN WILLIAMS:** Tuesday at 9.45. Thanks, everyone.

7 (3.38 pm)

8 (The hearing adjourned until 9.45 am

9 on Tuesday, 30 April 2024)

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

182

INDEX

ANGELA MARGARET VAN DEN BOGERD (continued)¹

Questioned by MR BEER (continued) 1

Questioned by MR HENRY 99

Questioned by MR MOLONEY 118

Questioned by MS WATT 140

Questioned by MS OLIVER 145

Questioned by MR STEIN 149

183

<p>MR BEER: [21] 1/6 17/23 17/25 31/16 49/10 49/19 68/24 82/12 82/15 82/21 96/20 97/2 118/11 118/21 140/14 145/3 145/6 148/17 148/21 181/22 182/5</p> <p>MR HENRY: [8] 97/8 98/24 99/3 99/5 115/11 116/4 116/14 116/17</p> <p>MR MOLONEY: [4] 118/25 121/16 130/3 140/11</p> <p>MR STEIN: [3] 149/1 173/1 181/19</p> <p>MS OLIVER: [1] 145/10</p> <p>MS WATT: [3] 140/16 145/1 148/13</p> <p>SIR WYN WILLIAMS: [57] 1/5 17/15 17/19 17/24 31/2 31/7 31/9 31/12 31/15 49/13 49/17 67/9 67/13 67/16 67/19 67/22 68/2 68/15 68/18 68/21 82/2 82/7 82/14 82/17 96/25 97/3 97/9 98/11 98/14 98/20 98/25 115/9 115/12 115/24 116/1 116/13 116/16 118/9 118/12 118/16 118/23 121/14 129/5 129/19 130/1 140/12 145/2 145/4 145/7 145/9 148/14 148/18 172/18 172/22 181/20 181/23 182/6</p> <hr/> <p>'00s [1] 168/5 '14 [2] 81/9 81/23 'can [1] 84/16 'compensation [1] 19/4 'compensation' [1] 19/9 'Could [2] 86/17 86/19 'Helen [1] 56/13 'lost' [1] 37/11 'remote [1] 115/2 'rumblings' [1] 170/25 'token' [1] 64/13</p> <hr/> <p>1</p> <p>1 September [3] 21/23 23/23 30/7 1,000 [1] 157/24</p>	<p>1,000 pages [1] 93/18 1.09 [1] 118/13 1.10 [1] 98/23 1.12 [1] 93/9 1.16 [3] 93/4 93/8 93/9 10 [2] 61/5 92/7 10 May [1] 7/25 10 years [1] 113/5 10-minute [2] 82/13 140/13 10.58 [1] 49/14 100 [2] 64/6 168/13 100 million [1] 68/9 102 [2] 150/25 165/25 11 October [2] 10/13 122/22 11.10 [2] 49/12 49/16 114 [1] 60/9 12.01 [1] 82/18 12.10 [1] 82/20 12.30 [1] 98/22 13 [1] 122/1 13 February [3] 45/11 75/5 131/5 13 November [2] 117/6 117/18 136 [1] 75/1 14 [1] 170/23 14 April 2014 [1] 106/8 14 separate [1] 123/3 140,000 [6] 19/4 19/9 19/20 25/7 35/5 36/8 149 [1] 1/16 15 [1] 3/10 15,000-odd [1] 9/15 15.28 [1] 108/9 150 [1] 75/1 158 [1] 1/17 17 December [1] 113/12 17 July [3] 2/14 3/5 4/8 18 [1] 50/19 18 June [1] 119/8 18 June 2012 [1] 119/2 18 years [2] 2/2 3/7 18,000 [1] 7/7 19 November [1] 49/25 1990 [1] 113/5 1996 [2] 141/2 141/7 1st [1] 30/10</p> <hr/> <p>2</p> <p>2 February [3] 95/19 96/2 96/5 2 May [2] 7/25 8/4 2 months [1] 27/22 2.00 [3] 118/11</p>	<p>118/12 118/15 2.1 [1] 29/10 2.45 [2] 148/17 148/22 2.54 [1] 148/24 2.55 [1] 148/18 20 [3] 6/20 9/9 168/12 20,000 [1] 113/7 200 [1] 7/12 2000 [3] 113/6 155/20 177/7 2001 [4] 113/8 113/12 113/25 141/7 2002 [1] 113/13 2004 [1] 172/20 2005 [1] 122/8 2006 [6] 122/13 122/14 122/20 122/22 122/23 141/3 2008 [1] 123/5 2009 [6] 156/21 157/8 157/13 157/23 158/7 168/2 2010 [11] 99/5 99/9 100/21 100/25 101/21 103/1 109/10 112/7 155/18 172/6 173/2 2011 [10] 104/3 104/14 109/11 153/8 153/15 154/4 171/21 171/24 172/12 172/17 2012 [6] 3/11 73/24 119/2 119/8 155/15 172/6 2013 [23] 2/9 2/14 3/5 3/11 10/5 10/13 10/22 36/17 36/25 49/21 50/1 67/12 67/23 71/16 74/2 74/11 81/18 107/5 117/6 117/18 131/5 145/18 146/4 2014 [19] 46/19 55/22 63/15 67/23 73/10 75/5 80/17 81/4 82/21 83/3 85/16 96/17 106/7 106/8 107/7 107/20 107/24 108/9 177/17 2015 [17] 28/7 90/3 95/19 96/2 96/5 110/7 113/20 115/11 115/12 115/14 115/17 115/19 154/22 171/12 171/19 177/7 177/18 2016 [2] 154/23 171/12 2019 [1] 163/9 2024 [2] 1/1 182/9 21 August [1] 113/20 22 [1] 135/25 22,000-odd [1] 113/9 22.06 [1] 117/6</p>	<p>23 January [1] 36/25 23 October [1] 157/8 23 September [2] 10/5 10/22 24 February [2] 63/15 122/8 25 [1] 64/9 25 January [1] 123/5 25 May [1] 155/18 26 [1] 20/11 26 April 2024 [1] 1/1 282,000 [3] 90/22 91/7 91/9</p> <hr/> <p>3</p> <p>3 December [1] 101/21 3 July [3] 2/9 6/16 7/5 3 months' [1] 25/4 3 October [1] 7/4 3,000-odd [1] 7/11 3,600-odd [1] 7/11 3.38 [1] 182/7 3.40 [1] 148/19 30 [4] 168/13 170/21 170/23 182/9 30 minutes [1] 98/21 30 October 2006 [1] 122/23 31 July [1] 5/10 36,644.89 [2] 122/15 124/1 37,360.06 [1] 122/16 38,000 [2] 9/14 9/20 39,000 [1] 3/11</p> <hr/> <p>4</p> <p>4 August [1] 156/20 4 November 2009 [1] 157/13 4.3 [2] 179/14 179/17 40 [1] 168/13 40 per cent [1] 165/25 400,000 [1] 92/17 43 [1] 151/1 45 [1] 45/8 45 minutes [1] 118/22 48 per cent [1] 151/3</p> <hr/> <p>5</p> <p>5 December [1] 100/25 5 January [2] 90/3 104/3 5 May [1] 122/19 5 November [1] 157/17 5 November 2009 [1] 157/23 5.02 pm [1] 10/23 5.25 [1] 8/4</p>	<p>50 [2] 152/9 158/7 50 million [1] 64/9 50 years [1] 160/11 50,000 [4] 7/19 152/10 152/11 152/21 58 [1] 178/18</p> <hr/> <p>6</p> <p>6 January [1] 105/9 60 [1] 60/11 600 [1] 3/12 61-odd [1] 124/6 61.77 [1] 123/23 650,000 [1] 91/7</p> <hr/> <p>7</p> <p>7 February [1] 146/4 7 March [1] 122/13 7,000 [4] 29/6 157/13 157/18 157/24 7,500-odd [1] 9/20 7,600 [2] 6/20 6/25 7.15 [1] 107/24</p> <hr/> <p>8</p> <p>8 July [1] 71/15 8 March [1] 113/13 8-year [1] 6/24 80s [1] 5/18</p> <hr/> <p>9</p> <p>9 December [2] 107/24 108/9 9 March [1] 122/14 9 May 2014 [1] 106/7 9 September [1] 115/10 9 September 2015 [1] 115/14 9.45 [4] 1/2 182/5 182/6 182/8 90,000-odd [1] 90/16 94 [2] 45/8 90/22 95 [1] 46/2</p> <hr/> <p>A</p> <p>A41 [1] 10/6 abandon [1] 179/20 abided [1] 181/25 ability [1] 55/18 able [24] 6/23 28/18 32/7 32/9 37/22 40/14 42/8 79/1 104/15 112/23 117/2 125/3 126/21 131/12 131/19 137/17 139/21 152/15 159/8 159/18 166/16 169/4 175/21 177/13 about [189] above [5] 19/13 30/16 111/24 147/6 181/18 absence [1] 174/17 absolutely [8] 40/14</p>
---	--	--	---	---

A	acquire [2] 107/13 107/14	52/22 53/12 154/19	aide [1] 123/9	already [19] 16/18 29/15 30/22 33/18 40/11 50/25 59/12 61/4 81/25 90/8 98/22 99/24 101/11 108/10 126/24 127/21 145/14 146/14 165/24
absolutely... [7] 89/13 110/8 110/15 137/12 144/20 152/10 162/17	acquired [1] 107/7	advisers [9] 26/19 53/23 54/25 60/15 61/5 171/14 171/20 172/13 173/22	AI [4] 85/11 85/13 85/15 85/16	also [26] 5/12 8/9 10/2 19/18 27/4 28/16 50/20 51/8 51/9 51/11 81/13 83/9 84/10 86/2 104/11 109/23 110/22 115/1 123/22 125/25 131/13 143/16 149/24 150/18 150/22 171/13
accept [13] 24/7 24/10 27/16 27/24 33/23 35/1 57/18 70/12 116/22 125/24 126/1 143/9 161/24	acted [1] 69/25	Advisers/Investigato rs [2] 60/15 61/5	Alan [11] 3/21 10/23 11/12 34/17 50/14 52/12 53/12 56/16 58/13 73/12 106/23	alteration [1] 57/6
acceptance [1] 26/21	action [12] 19/5 19/22 33/9 156/4 159/10 159/12 159/14 169/5 178/7 178/24 180/21 181/12	advising [1] 72/25	Alan's [1] 74/3	alterations [1] 72/12
accepted [10] 31/22 35/23 108/10 115/17 115/18 115/20 115/21 123/4 125/21 172/22	actions [3] 11/9 164/13 179/6	Affairs [2] 73/2 73/3	alarm [11] 42/3 47/18 130/23 132/13 132/20 132/23 132/24 133/7 133/12 133/14 134/5	altered [1] 115/2
accepting [3] 102/4 103/12 164/25	active [1] 11/9	affected [3] 3/15 95/13 177/14	albeit [1] 139/7	altering [1] 110/25
access [18] 55/3 55/5 56/23 59/12 100/18 100/21 100/24 101/20 102/10 104/19 105/11 105/14 109/14 112/7 115/15 116/7 142/16 169/17	actual [4] 36/10 38/3 71/9 143/19	affecting [1] 17/19	alert [1] 39/14	alternative [2] 27/9 27/11
access' [1] 115/2	actually [30] 9/17 14/18 14/21 14/21 17/24 30/5 38/12 38/17 55/2 68/7 70/20 75/13 78/24 82/24 96/12 105/13 111/2 115/22 125/13 127/5 127/7 128/14 132/25 136/11 138/1 138/23 142/5 142/6 144/5 148/11	after [14] 4/2 17/10 18/2 18/5 21/8 30/5 46/17 67/20 73/9 79/25 81/17 98/5 141/21 146/9	alerted [3] 101/22 101/24 102/2	alternatively [1] 27/17
accident [1] 14/17	add [2] 145/7 147/9	afternoon [7] 11/3 118/16 140/17 146/17 148/14 149/2 149/17	Alice [2] 65/2 119/20	although [8] 6/11 8/1 44/6 44/22 71/19 71/23 71/24 94/24
accommodate [1] 27/6	added [1] 89/16	afterwards [1] 74/3	alive [1] 11/9	always [17] 15/15 35/16 35/18 36/5 51/4 62/25 63/5 63/8 63/11 65/7 70/22 77/10 107/10 146/8 177/25 180/18 181/4
according [1] 43/25	adding [1] 6/18	against [15] 22/11 25/16 28/15 28/17 28/24 97/11 97/19 98/1 126/13 136/19 138/9 140/10 144/1 159/1 179/6	all [97] 4/2 5/15 8/6 11/23 12/3 13/22 14/11 15/20 15/22 16/24 17/8 17/21 20/9 22/14 22/16 26/10 28/13 35/24 35/25 37/10 46/24 47/10 54/22 55/5 55/6 55/20 56/9 56/14 58/23 60/1 60/25 66/20 67/7 75/20 79/3 80/7 80/9 80/11 84/24 90/17 91/22 92/13 92/15 93/8 93/16 94/13 98/18 102/21 102/25 105/10 107/3 108/2 108/6 109/7 109/9 110/15 111/2 111/4 112/24 113/5 114/12 116/2 116/20 116/24 120/4 121/3 122/3 122/6 122/22 125/2 126/8 128/5 129/23 130/1 130/3 132/8 136/10 136/20 137/8 144/20 146/8 150/18 152/1 152/2 154/8 155/3 157/6 163/9 164/12 168/19 171/8 173/16 174/13 176/15 179/25 181/23 181/23	am [14] 1/2 5/22 11/13 12/3 12/10 13/1 18/5 18/11 49/14 49/16 50/17 72/6 72/21 182/8
account [24] 29/6 83/4 83/17 83/22 84/16 84/18 85/9 85/25 86/5 86/20 87/9 88/11 88/24 89/1 89/10 91/17 92/15 92/17 95/9 100/10 102/9 102/12 102/17 107/1	additional [4] 123/23 125/24 125/25 126/10	age [1] 40/2	amazing [1] 120/5	amongst [2] 83/3 173/14
accountant [1] 89/8	address [4] 86/11 120/4 120/6 147/13	agenda [1] 76/2	amend [1] 105/16	amount [6] 9/19 19/7 63/7 63/7 87/4 129/22
accountants [1] 77/13	addressed [5] 2/23 48/7 58/18 121/1 121/3	Agent [1] 2/23	amended [2] 29/16 147/25	amounts [4] 37/16 64/16 84/7 84/19
accounted [1] 123/24	ad [1] 118/9	ago [1] 131/13	amplification [1] 17/25	analysed [1] 124/11
accounting [8] 3/10 84/3 87/20 88/13 91/18 122/25 123/3 124/12	adjourn [1] 182/8	agree [24] 13/21 33/16 33/21 34/12 45/16 51/13 69/24 80/19 114/1 141/16 141/24 142/1 142/3 146/20 166/9 166/10 166/15 168/7 169/1 169/2 170/16 173/12 173/18 180/8	amongst [2] 83/3 173/14	analyst [1] 42/11
accounts [14] 28/19 84/2 84/8 84/11 85/4 85/8 87/3 88/5 88/22 89/9 92/4 112/8 112/20 123/25	adjourned [1] 182/8	agreed [9] 29/11 31/23 35/8 53/19 53/20 72/12 89/17 125/14 138/20	amplified [1] 29/16 147/25	Andrew [7] 38/25 39/1 39/2 53/8 65/24 83/2 86/3
accurate [3] 79/18 133/1 133/5	adjustment [2] 45/14 147/3	agreement [14] 22/13 28/13 28/16 29/16 29/19 30/1 31/10 35/7 35/12 35/13 35/20 77/11 136/7 168/23	amplified [2] 29/16 147/25	Andy [3] 10/24 39/2 56/16
accused [2] 2/6 3/9	adjustments [1] 57/19	agreements [1] 35/24	amplified [3] 29/16 147/25	ANGELA [11] 1/3 18/4 83/5 102/14 108/1 108/13 108/15 108/23 131/6 133/22 183/2
achieve [3] 69/2 69/10 168/12	advance [1] 104/12	agrees [1] 27/7	amplified [4] 29/16 147/25	Angela/Elaine [1] 133/22
achieving [2] 170/4 170/14	advantage [1] 49/17	ahead [3] 24/12 41/3 101/12	amplified [5] 29/16 147/25	angry [1] 13/1
acknowledgement [2] 57/22 58/3	advice [9] 3/21 7/1 13/20 28/6 62/10 62/18 149/23 153/20 154/3		amplified [6] 29/16 147/25	
acknowledgements [2] 57/15 57/24	advise [2] 40/14 147/16		amplified [7] 29/16 147/25	

A	62/4 62/22 66/10 69/16	are [95] 3/6 12/3 16/11 16/13 16/19 18/6 18/8 19/1 19/3 26/6 31/2 37/7 37/12 37/17 40/15 43/19 45/14 46/7 47/16 48/12 56/8 58/10 59/2 71/9 72/14 72/17 78/14 78/14 78/21 82/7 83/9 83/24 83/25 84/3 85/15 86/19 91/20 92/6 97/4 98/2 98/11 98/22 99/21 100/11 100/17 100/20 102/4 103/5 103/12 103/13 104/1 105/3 106/17 107/15 108/1 109/21 111/18 111/22 114/1 114/11 117/5 120/2 120/5 123/4 125/22 129/12 130/21 132/8 132/9 136/18 137/1 137/1 143/3 143/9 146/25 147/3 148/13 151/4 151/13 151/15 153/15 155/5 155/6 155/9 155/14 157/4 162/2 164/16 165/7 165/17 172/10 175/25 178/24 179/22 179/23	132/14 135/9 136/12 137/6 137/16 137/18 138/3 138/8 138/13 138/17 138/23 145/25 146/6 146/8 146/19 147/4 147/10 147/25 arrangement [1] 7/9 arrest [1] 6/23 arrested [2] 177/10 177/18 arrival [1] 74/12 arrive [1] 90/23 arrived [1] 8/9 arrogant [1] 11/6 article [1] 150/16 articles [2] 155/4 155/6 articulate [1] 40/15 articulated [2] 71/22 143/16 as [195] ascertained [1] 131/21 aside [1] 8/16 ask [17] 1/10 1/14 1/16 41/24 64/17 78/18 81/9 81/24 95/23 98/3 99/6 105/3 118/25 119/5 132/6 145/11 145/16 asked [41] 2/14 21/18 23/17 23/25 29/11 33/25 40/11 42/10 46/5 46/18 46/24 48/1 49/22 50/19 53/13 54/5 57/4 59/12 62/20 81/12 84/15 85/1 94/8 106/15 106/23 110/2 111/6 127/15 127/18 128/25 128/25 130/12 130/13 130/18 138/20 144/16 145/14 148/6 149/18 151/20 155/3 asking [11] 15/5 51/16 53/9 81/3 89/22 102/22 106/16 106/17 110/21 156/3 180/7 aspect [1] 167/21 asserting [2] 51/5 79/15 assertion [1] 58/21 assertions [2] 37/10 37/12 assessment [4] 9/8 141/10 141/24 180/4 assets [2] 91/20 91/22 assign [1] 37/18 assist [1] 98/12 assistance [5] 149/25 156/23 165/19 165/22 178/5 assistant [3] 9/2	107/21 108/10 assurance [1] 104/18 assurances [1] 11/7 assured [2] 47/10 72/18 at [304] at page 2 [1] 40/6 attach [1] 57/11 attached [6] 8/21 27/13 28/3 28/8 35/8 51/4 attempt [2] 63/3 63/5 attempted [1] 8/23 attend [3] 11/21 12/17 122/18 attention [8] 46/9 47/15 47/24 47/25 58/12 130/20 155/24 175/7 attributed [1] 89/9 audience [1] 180/3 audit [11] 113/8 122/12 122/14 123/19 123/21 124/19 126/9 128/11 128/21 169/3 169/19 August [8] 67/12 72/12 74/1 81/17 81/18 113/20 156/20 172/6 August 2012 [1] 172/6 Aujard [7] 63/16 74/7 74/10 82/5 86/3 86/10 96/14 Aujard's [2] 63/19 74/12 author [1] 80/3 authored [1] 78/17 authorise [1] 12/23 authority [1] 56/19 auto [4] 50/24 51/4 110/17 137/21 auto-generated [1] 50/24 automated [1] 52/2 automatic [3] 37/6 110/12 134/21 automatically [2] 45/5 57/19 automaton [1] 35/18 availability [1] 148/3 available [11] 80/11 120/3 121/4 121/20 126/19 127/8 127/12 129/4 130/8 146/8 178/5 Avene [3] 107/20 107/25 108/9 average [1] 3/12 avoid [3] 84/24 144/22 160/12 await [2] 6/13 7/13 awaiting [1] 102/1
----------	---------------------------	---	---	--

A	based [5] 45/13 91/20 91/23 93/2 147/3	2/8 3/6 3/9 3/22 4/9 5/13 5/23 6/3 6/7 6/11 7/16 9/15 11/14 11/23 12/6 18/8 18/15 18/22 19/15 24/14 25/3 26/18 28/12 28/13 29/3 33/1 33/2 33/6 34/15 34/17 38/19 38/21 38/21 39/6 43/3 44/1 45/10 49/22 52/17 53/17 54/17 54/18 54/18 55/7 61/11 62/18 65/23 65/24 67/11 67/14 68/8 68/11 69/8 71/2 71/3 71/20 72/6 74/1 74/3 75/23 75/23 75/24 78/11 80/14 81/11 81/12 81/13 81/16 81/17 81/17 81/20 81/20 82/4 82/5 82/5 87/4 87/5 87/10 89/20 91/9 93/6 93/14 94/15 94/22 101/14 108/3 108/25 109/4 111/16 111/18 114/13 115/7 115/19 116/20 117/16 118/1 118/6 121/10 124/13 126/10 126/13 126/16 126/24 127/21 128/11 128/13 129/12 129/15 134/22 135/10 135/14 136/16 136/24 137/3 137/6 137/19 137/21 138/5 138/22 139/4 139/6 139/22 146/14 148/8 148/11 150/2 151/1 153/5 153/6 153/25 154/16 154/18 155/15 155/18 156/2 157/9 157/14 157/18 157/19 157/20 158/9 158/13 158/17 159/4 159/8 159/8 159/9 159/15 160/7 160/9 164/4 165/4 165/13 165/21 166/4 166/25 167/4 167/11 167/16 167/19 167/19 167/20 167/22 167/24 167/25 168/2 169/15 170/9 171/19 172/16 173/18 175/18 179/25	64/22 72/5 89/2 90/23 96/5 96/22 97/3 97/21 98/15 106/18 107/16 113/4 115/14 121/10 123/1 125/8 133/5 143/25 179/17 begin [1] 148/18 beginning [4] 62/21 64/18 70/23 176/24 begins [2] 122/1 122/4 behalf [8] 11/13 25/11 60/14 66/3 88/9 114/10 140/14 145/11 behave [1] 160/24 behind [4] 9/3 41/22 112/21 132/3 being [86] 2/6 6/14 11/4 17/3 20/12 21/25 23/5 24/18 26/14 33/5 42/15 49/17 51/11 52/3 52/6 53/3 57/5 63/2 71/22 72/9 72/15 73/21 75/1 80/4 85/8 85/12 89/9 89/16 89/20 90/5 98/14 103/5 103/7 105/3 105/5 105/6 106/12 110/13 114/18 115/2 116/17 119/12 124/1 134/20 142/5 144/11 146/10 146/20 147/24 150/11 150/23 151/5 151/15 152/12 152/20 152/23 154/13 158/19 158/20 158/21 158/24 159/22 160/3 160/5 162/17 162/23 164/1 164/13 165/7 166/12 166/16 166/18 167/2 167/18 169/4 169/11 169/20 173/4 176/2 176/22 177/20 179/1 180/16 180/19 180/24 181/7 belief [1] 69/14 believe [15] 4/1 18/23 35/25 36/10 49/4 49/6 76/18 78/12 78/15 88/3 126/5 147/1 161/17 171/4 179/18 believed [6] 99/25 100/13 100/19 139/3 144/21 162/10 believers [1] 8/24 Belinda [16] 58/10 58/25 59/1 59/4 59/9 65/22 72/25 82/6 83/5 84/15 85/23 86/3 86/10 87/17 108/1 110/2 Belinda's [2] 59/3 108/7	bells [11] 42/3 47/18 130/23 132/13 132/20 132/23 132/24 133/7 133/12 133/14 134/5 below [6] 57/6 83/7 101/6 102/15 108/12 180/2 beneficial [1] 31/4 benefit [3] 92/24 93/1 93/14 best [6] 32/6 33/15 62/3 69/15 92/17 105/18 bets [1] 66/20 better [2] 175/23 179/18 between [17] 7/8 36/12 41/1 41/7 45/12 49/9 54/23 63/16 68/2 82/15 90/2 92/21 111/11 141/7 162/7 171/12 177/6 biblical [1] 143/4 big [1] 70/19 bill [9] 38/6 38/6 38/14 38/18 38/19 38/21 77/12 138/1 138/6 bills [2] 76/10 78/25 binding [1] 27/12 BIS [1] 101/12 bit [18] 13/13 16/3 58/14 73/18 83/2 83/2 106/10 113/22 133/16 133/20 146/15 153/14 158/22 161/20 175/15 176/25 177/3 181/13 blame [4] 9/20 126/2 153/16 177/9 blamed [4] 152/12 169/11 177/7 177/20 blames [1] 157/25 blaming [1] 9/22 blank [1] 38/10 blatant [2] 114/23 115/6 blew [1] 113/14 blighted [1] 118/2 blind [2] 134/14 143/3 blips [1] 37/11 board [12] 2/15 4/1 4/10 4/11 46/3 64/2 64/14 71/17 74/7 75/11 75/16 77/16 BOGERD [63] 1/3 1/7 17/23 23/17 48/3 49/20 80/25 82/22 96/20 97/10 103/3 108/13 111/21 118/25 127/2 127/10 132/13 133/7 133/9 134/8 134/15 138/25 140/2 140/11 140/17 143/2
B	back [32] 7/2 13/4 19/17 20/25 35/17 38/15 41/1 43/8 54/4 54/17 59/13 63/21 64/8 64/21 73/13 84/14 95/2 95/4 95/11 95/14 100/21 102/25 103/1 110/25 111/10 112/16 113/10 128/1 131/2 170/1 174/25 175/10 backbone [1] 61/22 backdoor [1] 101/22 background [6] 1/21 2/17 5/5 5/15 20/4 173/2 backs [1] 112/21 bad [5] 24/17 54/4 69/25 161/2 165/4 bags [1] 8/11 Baker [1] 105/13 balaclava [1] 8/14 balance [4] 6/4 6/8 91/24 92/16 balances [3] 83/12 84/17 92/10 balancing [4] 115/25 116/1 116/6 116/9 ball [1] 79/5 bank [4] 91/14 91/20 92/15 164/9 banks [3] 91/17 91/18 91/22 bar [2] 8/25 8/25 Bardo [2] 137/4 137/11 barely [1] 177/13 bargain [1] 90/22 bargained [1] 90/15 barriers [1] 55/14 base [11] 107/6 107/7 107/8 149/22 150/3 150/5 150/6 150/22 155/5 167/6 167/13	basic [6] 41/23 47/15 129/21 130/20 132/4 159/6 basically [8] 92/11 95/11 139/15 139/19 158/19 159/24 163/13 166/5 basis [15] 3/20 28/11 30/9 35/5 84/8 106/15 112/13 122/1 123/4 125/15 125/20 125/24 126/1 127/20 154/2 basket [1] 147/11 Bates [11] 3/21 10/23 12/9 34/17 50/14 52/12 53/12 72/4 73/10 73/20 178/7 BBC [2] 3/23 144/15 BBC News [1] 3/23 be [223] Beal [1] 161/25 bear [1] 91/14 became [9] 5/1 44/23 46/5 67/3 68/15 68/21 142/20 171/6 171/16 because [99] 9/18 12/12 14/20 16/20 17/6 17/7 20/21 21/7 21/12 21/19 22/4 22/8 22/18 23/21 30/11 30/25 31/11 32/4 33/17 34/15 35/15 35/20 36/1 36/11 39/2 39/23 40/22 44/11 44/16 44/17 44/23 45/1 45/4 47/25 54/3 54/13 54/23 55/5 66/11 68/1 71/11 78/1 78/20 80/10 82/8 82/16 88/6 88/11 90/22 91/11 91/15 92/13 94/11 95/24 96/7 100/6 100/7 101/15 102/13 102/24 103/10 103/18 103/23 103/24 104/12 104/18 105/23 111/18 113/22 114/9 119/9 120/18 123/18 125/5 126/5 127/9 128/21 132/21 139/7 139/13 139/19 139/24 143/16 153/17 155/22 166/11 169/10 169/12 169/14 169/15 169/19 169/19 170/10 172/1 174/12 174/21 180/9 181/6 181/7 become [1] 79/21 bed [1] 155/22 beefs [1] 136/13 been [175] 2/1 2/6	BEER [20] 1/4 1/5 17/15 49/18 107/4 115/14 118/10 118/12 118/16 120/8 130/12 130/18 135/24 140/13 144/22 145/13 152/3 172/19 181/21 183/4 before [28] 2/15 4/10 20/3 27/3 27/23 32/10 33/21 37/23 60/22	

B	149/5 168/20 168/22 170/15 171/7 174/9 175/6 brand [4] 14/11 14/12 15/17 174/13 Brander [4] 123/14 124/10 127/3 128/20 brave [1] 173/4 breach [1] 29/14 breaching [1] 9/12 break [8] 3/17 49/11 49/15 82/13 82/19 118/19 148/15 148/23 Breeden [5] 101/16 101/22 102/10 105/25 171/24 Breeden's [1] 100/25 Bridger [1] 6/17 brief [5] 46/2 80/16 81/4 96/5 101/12 briefed [1] 81/22 briefing [11] 81/23 82/9 89/24 119/2 119/3 119/8 119/17 119/18 120/8 121/1 121/22 briefly [5] 20/14 83/6 100/24 103/22 130/14 bring [2] 26/23 136/21 bringing [4] 56/21 58/11 136/19 137/2 broad [2] 75/25 88/7 broader [7] 23/10 23/14 43/9 48/17 48/18 65/1 176/5 broadly [1] 145/10 broken [1] 11/20 Bromley [1] 113/11 brother [5] 14/15 21/23 23/23 30/10 31/19 brought [8] 46/8 54/4 73/13 77/14 112/9 116/18 174/20 175/10 BT [2] 38/6 38/21 Bugger [1] 93/8 bugs [2] 114/1 142/15 build [1] 173/3 build-up [1] 173/3 built [1] 13/3 bullet [4] 77/21 78/10 78/13 79/14 Bully [1] 12/6 bullying [1] 160/21 burst [1] 8/15 bus [7] 10/8 10/23 11/25 14/18 14/23 15/19 32/25 business [14] 3/8 3/17 5/25 6/4 7/8 18/20 22/18 26/3 33/16 50/13 50/14	79/9 91/16 116/25 but [149] 2/3 2/16 3/13 4/15 5/4 5/7 9/10 12/12 16/4 16/19 17/16 17/19 19/9 20/4 20/20 21/25 22/6 22/10 22/20 22/23 23/4 24/11 25/17 27/4 27/12 29/7 29/15 30/21 35/2 35/22 36/10 37/3 38/15 39/17 40/12 43/4 43/22 44/3 44/12 44/20 45/23 46/1 46/7 46/20 46/22 48/9 48/19 48/22 49/8 51/11 51/20 52/17 54/24 57/4 59/7 61/15 62/13 65/7 65/12 67/7 69/8 70/8 70/17 70/20 71/6 71/21 72/16 74/9 77/12 77/19 79/10 80/23 81/7 81/19 82/15 89/6 92/4 93/6 94/7 95/18 95/25 97/12 97/20 98/21 100/7 100/15 101/1 102/11 103/10 103/16 103/22 104/11 105/5 106/7 106/9 107/4 107/13 108/19 108/25 109/3 110/14 113/10 113/17 115/13 115/16 117/1 117/5 117/11 120/6 122/3 125/6 125/13 125/23 126/8 126/22 127/13 128/13 128/15 129/16 132/19 134/1 134/18 135/17 136/24 137/22 138/5 142/17 142/22 142/25 143/9 147/20 148/11 150/13 150/23 151/21 152/17 153/25 154/18 155/16 157/15 157/20 159/1 162/11 166/4 168/20 170/7 176/15 177/23 180/16	came [19] 9/25 14/14 14/24 29/24 38/6 38/15 60/20 65/5 67/20 71/15 73/9 74/10 108/7 119/9 124/20 163/22 167/6 168/4 180/12 Cameron [1] 85/11 can [122] 1/10 1/21 2/20 2/21 2/22 5/9 5/11 5/16 6/12 7/14 7/24 8/22 9/5 10/20 12/22 13/4 13/5 13/13 13/14 13/19 13/25 17/9 17/14 18/11 24/22 27/18 28/5 36/7 36/8 36/22 36/22 37/11 39/18 40/16 40/23 41/4 41/21 43/22 49/18 49/20 52/14 55/22 56/18 57/2 57/9 60/2 60/3 63/14 63/19 72/1 72/3 72/16 73/1 75/4 75/5 76/2 76/3 78/1 81/11 82/12 82/21 83/1 84/13 84/20 86/1 86/5 86/6 86/7 89/25 92/16 94/10 94/20 97/3 97/13 98/12 99/1 100/7 101/4 101/13 102/13 104/4 106/7 107/18 107/18 107/20 110/19 114/8 114/9 116/7 116/14 117/4 118/18 118/21 119/17 123/13 128/1 128/1 132/2 135/17 135/22 140/25 145/3 145/9 145/9 145/10 145/15 145/19 145/20 146/6 146/11 146/14 147/5 147/16 152/6 153/16 156/12 156/17 164/23 166/22 169/22 172/18 179/11 can't [22] 4/15 46/1 46/16 69/6 71/21 71/24 85/16 86/25 102/24 103/17 105/15 109/13 120/18 127/22 128/14 129/16 148/9 160/14 162/18 166/2 169/13 169/20 cannot [11] 3/13 12/21 18/16 18/21 45/22 46/4 47/4 84/1 93/11 105/15 158/2 car [3] 10/6 10/7 11/25 care [1] 174/17 career [1] 140/19 carelessness [1] 154/9	Carl [3] 90/3 90/9 90/12 carriage [1] 108/16 carried [1] 161/4 carries [1] 92/18 carry [6] 41/19 41/19 93/25 103/12 142/18 143/20 carrying [3] 60/15 157/14 157/18 Cartwright [2] 57/9 58/11 case [88] 1/13 1/18 2/14 3/14 4/3 12/10 13/19 16/5 17/7 24/1 26/21 30/5 30/13 31/17 32/25 33/4 34/14 36/6 36/8 37/2 38/3 39/5 40/12 40/12 43/7 43/11 48/1 49/7 50/2 50/3 50/4 50/9 51/15 52/7 53/13 54/18 54/20 55/4 56/15 56/17 56/19 60/14 61/1 61/5 61/9 64/14 70/22 78/12 78/16 81/21 87/2 90/18 94/4 94/19 95/5 98/14 106/14 114/7 120/9 121/6 121/7 121/11 122/4 124/24 125/2 126/23 127/6 129/8 130/8 132/16 134/19 136/16 136/19 136/21 136/23 137/2 137/3 137/24 140/3 142/17 143/23 153/9 161/14 165/20 169/24 172/21 175/23 180/2 cases [30] 51/9 56/9 56/14 58/23 59/7 70/16 70/16 74/16 88/2 117/3 117/13 127/19 128/18 136/10 137/8 139/13 139/25 141/19 142/21 142/25 151/22 165/17 166/18 166/20 172/15 174/2 174/21 176/15 176/16 179/6 cash [6] 8/6 114/2 122/15 123/21 124/13 124/20 cast [1] 129/12 Castleton [5] 50/12 50/18 51/22 52/12 53/18 Castleton's [3] 51/15 51/19 52/7 catching [1] 17/16 cause [3] 32/16 32/22 33/12 caused [7] 5/3 12/6 33/6 111/18 114/16
	C			
	calculation [2] 20/12 64/9 call [7] 48/12 90/1 90/2 116/6 136/12 142/5 159/3 callback [2] 157/16 159/3 called [6] 6/10 22/19 57/23 106/8 159/7 173/11 calling [1] 155/4 calls [1] 157/3 Cambridgeshire [1] 155/19			

<p>C</p> <p>consider... [5] 23/25 32/9 33/20 98/6 98/17</p> <p>considerable [2] 3/9 179/4</p> <p>consideration [6] 15/14 15/16 15/17 24/20 24/20 63/9</p> <p>considered [1] 4/3</p> <p>considering [3] 18/20 34/20 94/15</p> <p>consistent [1] 102/17</p> <p>consistently [3] 65/25 144/7 163/17</p> <p>conspiracy [2] 92/20 92/21</p> <p>constant [1] 181/15</p> <p>constituent [2] 120/13 126/15</p> <p>constituent's [1] 127/6</p> <p>constructed [1] 78/11</p> <p>consult [1] 98/15</p> <p>consulted [2] 81/20 81/20</p> <p>contact [4] 2/25 3/22 37/18 54/3</p> <p>contacted [4] 30/3 30/4 149/7 156/21</p> <p>contacting [2] 13/2 151/5</p> <p>contacts [1] 13/3</p> <p>contain [1] 146/19</p> <p>contained [1] 56/14</p> <p>contemporaneous [1] 162/3</p> <p>content [1] 81/7</p> <p>contents [1] 103/19</p> <p>context [5] 5/15 51/15 85/2 103/1 128/22</p> <p>continue [6] 6/12 26/20 27/1 31/22 142/23 143/1</p> <p>continued [6] 1/3 1/4 157/3 176/20 183/2 183/4</p> <p>continues [7] 3/20 12/9 29/9 77/21 93/23 93/24 94/2</p> <p>continuing [1] 94/1</p> <p>continuously [1] 104/20</p> <p>contract [23] 2/8 2/24 6/17 16/5 20/22 20/23 25/4 27/12 62/13 69/4 153/23 154/1 154/1 154/6 154/16 159/1 167/2 171/5 171/14 171/14 171/19 171/20 172/13</p>	<p>contracts [6] 69/3 71/2 154/19 167/12 171/22 173/22</p> <p>contrary [1] 161/24</p> <p>contribute [1] 76/16</p> <p>contributing [1] 118/2</p> <p>control [3] 12/21 76/12 77/3</p> <p>controversial [1] 162/1</p> <p>conversation [24] 23/24 24/3 30/2 30/9 30/20 30/23 35/3 36/12 44/2 44/15 45/25 48/8 65/1 94/16 105/19 145/23 150/1 151/19 154/20 161/12 161/16 161/18 181/17 181/17</p> <p>conversations [10] 32/5 34/19 49/6 64/25 65/12 67/8 69/20 70/18 79/11 130/15</p> <p>convicted [2] 59/17 119/12</p> <p>conviction [1] 96/14</p> <p>convictions [4] 47/3 47/5 104/22 112/19</p> <p>convinces [1] 93/20</p> <p>coop [1] 117/11</p> <p>coordinated [1] 110/3</p> <p>coordinating [2] 85/23 110/2</p> <p>copied [12] 10/25 41/2 50/12 52/25 54/13 55/10 72/25 84/14 85/21 86/10 104/5 104/11</p> <p>copy [6] 45/22 46/6 46/18 52/21 53/4 56/4</p> <p>copying [1] 53/11</p> <p>Core [5] 96/22 97/5 150/25 151/1 181/24</p> <p>Corfield [1] 73/9</p> <p>coroner [1] 10/15</p> <p>corporate [2] 18/24 176/7</p> <p>correct [34] 1/25 2/7 2/10 3/13 4/7 7/18 33/8 42/17 60/8 84/5 91/10 100/14 100/19 102/11 102/19 103/25 106/12 107/22 110/10 110/16 111/5 115/22 116/19 120/14 121/21 131/1 140/24 141/6 141/9 141/12 155/2 167/13 176/13 176/18</p> <p>corrected [2] 93/9 138/21</p> <p>correction [3] 58/2 147/3 176/3</p>	<p>correction/transaction [1] 58/2</p> <p>corrections [5] 45/13 57/15 57/21 100/15 158/3</p> <p>corrections/acknowledgements [1] 57/15</p> <p>correctly [2] 29/5 86/17</p> <p>correspondence [15] 14/20 20/2 40/17 41/1 43/24 45/12 52/23 52/24 53/11 54/6 54/13 54/23 71/24 145/18 145/19</p> <p>corroborated [1] 162/3</p> <p>cost [5] 117/1 136/9 136/25 136/25 136/25</p> <p>costs [2] 137/1 137/2</p> <p>could [74] 8/17 17/17 19/7 21/2 21/16 22/25 23/25 24/4 24/11 25/18 25/23 29/14 32/6 32/13 33/13 33/15 39/6 39/12 40/4 40/5 40/13 40/20 45/24 49/11 66/22 67/1 69/2 69/10 80/9 82/2 87/10 111/18 111/22 112/20 113/20 114/6 119/19 121/8 122/2 122/11 123/15 123/17 123/18 123/25 124/9 124/15 128/17 131/2 131/3 131/6 131/24 133/16 133/20 134/24 135/25 137/15 139/15 139/19 146/1 146/7 147/25 149/25 152/16 152/21 152/22 153/1 157/8 168/12 176/7 176/7 176/25 177/21 177/23 180/12</p> <p>couldn't [7] 46/21 46/22 85/9 123/24 126/2 131/20 180/13</p> <p>counsel [5] 63/18 65/20 65/22 178/12 178/15</p> <p>count [1] 123/5</p> <p>countenance [1] 64/15</p> <p>counter [1] 177/5</p> <p>counts [1] 123/3</p> <p>couple [4] 13/8 40/3 74/3 131/13</p> <p>course [8] 33/9 55/3 82/14 82/17 89/24 101/13 104/8 181/5</p> <p>court [39] 11/19 41/23 42/15 43/12 43/13 44/13 45/19 47/16 47/18 48/15</p>	<p>93/15 94/23 100/2 113/11 113/13 123/2 125/22 130/21 130/23 132/5 132/11 132/14 132/25 136/16 148/6 149/18 159/10 159/12 159/23 162/4 163/5 163/12 163/13 178/6 178/7 179/6 180/9 181/3 181/11</p> <p>courts [4] 49/3 144/14 169/23 169/24</p> <p>cover [2] 105/10 113/8</p> <p>cover-up [1] 105/10</p> <p>coverage [2] 3/23 4/2</p> <p>covered [3] 23/11 65/5 139/20</p> <p>covering [2] 46/6 166/19</p> <p>covert [1] 112/8</p> <p>CR [2] 147/17 147/18</p> <p>creating [1] 114/3</p> <p>Credence [12] 41/16 45/14 134/4 134/6 135/9 138/13 138/17 138/19 138/21 138/22 145/25 147/4</p> <p>credibility [1] 100/3</p> <p>credible [1] 117/14</p> <p>credit [2] 88/21 88/23</p> <p>credits [1] 87/2</p> <p>Crichton [6] 4/17 10/24 13/5 16/21 79/5 79/7</p> <p>crime [1] 120/16</p> <p>criminal [3] 104/22 125/23 169/23</p> <p>crisis [2] 144/23 175/2</p> <p>criteria [1] 169/17</p> <p>critical [3] 56/13 58/23 76/6</p> <p>criticised [1] 143/24</p> <p>criticisms [1] 164/25</p> <p>cross [2] 100/14 160/12</p> <p>cross-examined [1] 100/14</p> <p>crouched [1] 9/3</p> <p>crow [1] 8/25</p> <p>Crowe [7] 57/3 82/6 84/15 86/3 86/10 87/17 108/1</p> <p>Crown [9] 11/16 11/17 11/22 12/7 14/21 16/4 47/11 113/13 123/1</p> <p>Croydon [1] 113/13</p> <p>crucial [1] 143/19</p> <p>cruelty [1] 118/3</p> <p>culpable [3] 9/7 9/11 11/18</p> <p>culprit [1] 6/22</p>	<p>culture [1] 174/12</p> <p>currencies [1] 91/21</p> <p>currency [10] 91/9 91/14 91/18 91/22 92/2 92/3 92/4 92/9 92/10 92/12</p> <p>current [3] 80/16 86/21 92/17</p> <p>currently [2] 64/6 108/1</p> <p>customer [4] 38/6 38/12 38/14 38/18</p> <p>customer's [1] 38/13</p> <p>customers [1] 87/11</p> <p>cut [3] 101/14 128/19 176/7</p> <p>cutting [1] 52/11</p> <p>CWU [1] 144/13</p> <hr/> <p>D</p> <p>Dad [3] 18/9 18/14 19/8</p> <p>Dad's [1] 19/10</p> <p>daily [2] 3/20 8/18</p> <p>damn [1] 174/14</p> <p>damning [1] 95/5</p> <p>Damocles [1] 30/16</p> <p>dangerously [1] 12/1</p> <p>dark [1] 8/14</p> <p>Darlington [1] 55/24</p> <p>Darlington's [1] 58/22</p> <p>data [28] 37/21 41/16 42/15 42/25 49/3 51/19 85/1 87/24 88/4 104/12 112/8 131/13 131/19 131/20 132/11 132/14 134/3 134/6 135/9 135/9 135/13 137/6 137/16 137/18 138/4 138/8 139/20 145/25</p> <p>date [8] 44/23 67/5 74/9 85/16 96/2 115/9 115/17 125/11</p> <p>dated [4] 7/25 75/5 106/6 107/24</p> <p>dates [1] 115/16</p> <p>daughter [2] 17/10 18/3</p> <p>Davidson [1] 116/11</p> <p>Davies [3] 13/8 13/15 13/17</p> <p>day [10] 10/14 10/22 91/24 105/7 149/19 159/11 159/14 162/5 177/15 181/11</p> <p>days [2] 163/20 182/3</p> <p>deal [6] 108/12 109/1 112/14 117/5 120/9 175/22</p> <p>dealer [1] 91/16</p> <p>dealing [9] 16/11</p>
---	--	---	--	---

D	49/20 80/25 82/22 96/20 97/10 103/3 108/13 111/21 118/25 127/2 127/10 132/13 133/7 133/9 134/7 134/14 138/25 140/2 140/11 140/17 143/2 143/13 144/4 144/19 145/11 149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	developed [2] 124/3 124/8 developing [1] 79/23 Dickinson [2] 179/15 180/7 dictate [1] 79/1 did [101] 2/17 4/14 4/16 12/14 14/5 15/14 16/13 20/17 21/7 31/9 31/11 31/16 32/1 32/2 34/3 38/11 39/22 44/4 44/4 44/19 44/21 45/24 46/2 46/25 47/4 48/6 48/9 49/1 49/6 51/10 52/21 57/20 58/23 62/11 62/18 64/17 66/6 70/16 76/16 77/15 79/7 79/20 81/9 85/17 88/3 89/6 90/15 95/10 96/5 99/6 99/9 99/14 107/1 107/3 110/4 112/1 128/15 128/18 128/19 130/4 132/12 132/17 132/19 136/2 137/22 138/13 138/25 139/7 139/7 140/1 140/5 142/9 142/12 142/23 142/24 143/1 161/12 161/17 161/18 162/25 163/2 163/9 163/18 163/20 164/20 164/21 165/18 165/18 169/7 169/22 170/4 172/1 174/25 175/3 175/3 175/7 175/9 175/19 176/10 177/2 181/6 didn't [118] 4/21 10/4 12/19 14/5 14/17 15/1 20/22 22/5 23/4 29/8 30/10 30/22 31/19 42/20 43/25 44/14 46/12 46/15 47/18 48/17 53/19 54/2 55/14 55/16 58/25 59/5 66/3 66/14 66/18 66/25 67/4 68/2 68/5 68/10 68/23 77/18 77/19 78/2 78/15 80/11 83/14 88/14 90/5 90/7 94/3 94/6 95/6 95/17 96/7 101/23 102/11 102/18 102/20 103/10 103/17 103/18 103/24 104/16 104/17 104/18 104/21 104/22 104/24 105/16 105/21 105/22 105/23 106/9 106/11 106/18 107/5 107/13 109/11 112/6 112/12 112/22 119/10 121/10 126/6 126/13 126/23 127/1 127/19 128/15 128/25	129/9 130/9 130/23 132/20 132/20 132/20 133/8 133/11 134/13 135/9 135/21 137/13 138/2 138/9 138/18 138/19 138/24 139/12 139/17 141/20 142/1 142/19 148/7 148/7 149/11 160/22 160/24 160/25 162/11 166/20 169/6 177/18 179/10 died [1] 32/15 difference [3] 69/11 69/11 111/10 different [22] 26/6 26/8 26/12 30/14 35/6 36/10 62/17 68/13 72/22 73/6 73/22 78/8 80/25 81/3 91/21 103/9 122/6 128/21 158/9 167/15 171/22 172/8 differently [5] 48/19 133/11 134/18 143/11 164/17 difficult [1] 179/5 difficulties [1] 164/22 difficulty [1] 177/1 direct [7] 53/4 54/2 75/21 132/22 141/3 141/9 142/4 direction [1] 97/13 directions [1] 181/25 directly [13] 31/1 40/7 40/25 42/11 52/11 53/22 54/25 55/18 55/19 59/2 77/22 77/25 125/22 director [9] 16/1 75/25 75/25 76/1 154/25 167/20 167/22 171/12 173/7 directors [2] 63/17 75/15 disagree [1] 106/4 disagreeing [1] 95/3 disappear [1] 114/2 discern [1] 104/15 discerned [1] 137/18 disclose [1] 113/18 disclosed [7] 59/17 59/21 59/25 77/18 88/13 93/14 94/15 disclosing [3] 42/16 66/13 85/14 disclosure [10] 22/13 35/7 35/13 35/19 44/4 44/18 46/17 56/11 102/7 148/9 disconnected [1] 137/23 discover [1] 78/18 discovered [3] 3/24	34/12 43/11 discrepancies [5] 61/25 84/4 156/23 171/7 176/18 discrepancy [1] 157/11 discretionary [12] 24/6 24/11 25/6 25/13 25/19 26/21 27/7 27/16 27/18 27/24 33/10 33/23 discuss [6] 23/23 46/1 63/23 63/25 157/9 157/11 discussed [11] 4/13 19/2 29/24 31/18 49/8 61/20 72/10 72/11 73/21 83/6 176/9 discussing [1] 93/25 discussion [7] 12/18 71/20 93/23 93/24 110/23 111/15 163/4 discussions [6] 59/16 59/20 59/24 72/22 116/20 155/25 disgusted [1] 18/6 disgusting [1] 19/10 dishonest [5] 103/5 103/7 105/3 105/5 105/6 disillusioned [1] 181/7 disorder [1] 160/14 disposal [1] 111/4 disprove [1] 91/2 dispute [4] 32/16 32/18 39/3 154/1 disputed [2] 52/1 89/14 disregard [1] 91/6 distance [1] 78/21 distinct [1] 178/22 distinction [1] 112/23 distracted [1] 128/22 distributes [1] 13/14 Division [1] 125/23 do [122] 1/9 4/10 4/13 4/23 5/6 12/22 14/1 17/25 20/17 20/25 21/3 22/23 26/15 26/16 32/8 32/18 33/14 33/15 33/16 33/18 33/25 34/2 34/10 35/25 39/11 40/4 40/13 42/11 42/20 43/12 43/22 43/25 44/19 48/5 48/9 56/3 58/3 58/23 58/25 67/9 70/12 72/14 73/16 74/23 79/11 80/19 81/13 83/16 87/23 88/19 90/23 93/15
----------	--	--	---	---

D	15/13 17/15 20/3 30/16 41/14 41/24 43/10 43/18 43/21 44/2 44/3 44/15 44/20 48/8 49/4 49/6 52/17 65/7 66/11 67/5 69/6 69/18 70/19 71/19 71/22 74/24 76/18 81/8 93/4 100/1 100/9 101/1 101/2 102/20 102/23 103/22 105/15 106/21 109/14 109/14 122/3 124/5 125/5 126/4 127/7 127/13 127/17 129/14 129/24 132/5 134/2 136/2 136/23 145/7 147/2 147/20 148/6 148/11 149/10 151/21 154/14 155/10 155/13 155/16 159/25 160/16 165/6 165/24 166/1 168/1 174/10	47/15 47/24 47/25 130/20 drifted [1] 74/20 drifting [1] 75/3 drip [1] 31/23 drive [4] 52/2 180/8 181/2 181/14 driven [2] 12/2 80/4 driving [3] 68/9 85/22 108/17 drop [3] 19/5 19/21 180/2 dropped [2] 79/5 121/17 dropping [3] 22/10 23/8 121/14 drove [2] 10/6 11/24 due [8] 6/21 18/17 56/10 63/6 99/20 119/21 125/20 153/24 during [3] 69/25 172/8 177/15 duty [1] 8/6	20/23 25/2 else [10] 21/17 42/8 44/3 47/2 47/4 89/5 93/20 130/10 133/13 144/16 else's [3] 48/2 85/19 151/17 email [85] 11/3 11/11 13/5 13/14 13/24 14/23 15/9 17/13 19/12 19/19 20/3 21/24 28/6 36/23 37/3 37/15 39/24 41/12 41/18 41/20 42/20 43/23 43/25 45/10 45/11 45/23 45/25 46/1 46/6 49/4 49/5 49/9 49/25 53/11 55/8 55/24 56/3 56/16 56/21 56/23 57/3 57/5 57/7 57/12 57/12 58/16 58/22 72/3 83/1 84/15 85/7 86/2 86/8 87/1 100/25 101/6 101/14 101/21 102/5 102/7 102/11 102/15 103/23 103/24 104/2 104/15 105/25 106/5 106/6 106/8 106/11 109/10 116/11 131/3 131/7 131/9 131/24 133/4 133/24 145/17 145/19 146/3 146/16 146/24 147/6 emailed [3] 10/24 16/9 157/15 emailing [3] 18/5 40/7 56/2 emails [7] 36/21 47/1 47/1 47/6 101/9 106/17 108/19 embark [1] 97/3 embedded [1] 177/8 Emma [1] 52/22 employed [3] 149/4 158/5 179/1 employee [1] 115/15 employees [1] 87/12 employer [1] 177/7 encompassed [1] 109/22 end [11] 7/12 12/13 63/20 66/8 83/12 84/17 91/24 94/16 149/17 149/19 170/14 ended [1] 75/1 enforced [1] 99/2 engage [1] 78/2 engaged [3] 77/23 77/25 160/19 engagement [7] 36/3 36/4 64/1 64/4 66/5 66/6 119/14 engaging [1] 54/9	engineer [1] 79/16 enjoyed [1] 3/8 enough [3] 17/18 93/12 97/9 enquiries [1] 60/25 ensure [2] 24/13 132/9 ensured [1] 35/7 ensuring [4] 31/17 31/24 61/10 144/6 enter [1] 31/19 entered [3] 8/13 35/12 50/22 entering [1] 66/23 enters [1] 27/11 entire [4] 41/7 112/9 153/3 178/24 entirely [4] 9/11 66/16 93/13 142/3 entities [1] 180/1 entitled [1] 104/6 entries [1] 88/21 envelope [1] 64/8 Equally [1] 28/16 equation [1] 65/6 equivalent [5] 19/23 19/25 20/11 25/8 92/9 erect [1] 55/14 error [2] 99/1 154/9 errors [6] 3/24 6/15 87/11 114/3 153/23 162/1 escalate [1] 19/11 escalated [6] 158/17 159/4 159/6 159/9 165/14 165/21 escalating [1] 158/4 escalations [1] 175/22 especially [2] 113/25 146/9 essence [1] 40/22 essentially [3] 22/19 61/21 85/5 establish [2] 169/16 170/19 established [5] 33/13 50/25 64/12 70/8 120/9 establishment [1] 64/18 estate [3] 28/18 28/24 29/2 et [6] 47/12 102/3 102/4 117/7 117/7 129/9 et cetera [6] 47/12 102/3 102/4 117/7 117/7 129/9 euphemism [1] 116/4 evaluated [1] 162/18 even [14] 31/19 38/18 47/24 51/7 54/4
do... [70] 94/18 95/14 96/11 98/3 98/9 98/10 98/13 99/12 102/25 104/22 105/11 105/25 108/6 109/17 109/19 110/15 111/3 111/10 111/22 112/18 114/21 116/22 117/25 118/21 121/10 126/23 127/1 127/19 129/10 130/10 131/19 132/19 132/22 134/12 134/13 136/7 137/7 137/14 139/21 143/9 146/20 146/22 147/18 147/19 149/11 150/4 151/23 152/18 152/22 155/12 156/7 156/9 158/15 159/18 160/17 162/11 162/25 163/20 163/24 163/25 164/12 165/2 165/4 165/23 166/8 168/7 170/16 173/11 173/18 175/19	done [27] 17/3 26/14 32/12 35/13 40/2 43/3 47/11 54/18 60/1 80/8 85/10 94/11 117/24 121/10 127/21 133/9 136/16 137/16 138/5 143/8 147/17 154/2 158/2 163/7 163/18 165/2 175/15 Donna [3] 107/25 107/25 108/5 door [10] 8/8 8/11 8/17 8/17 8/19 8/20 8/23 9/25 10/2 110/25 dope [1] 92/23 Doreen [2] 5/17 9/9 doubt [3] 110/12 129/12 129/14 down [41] 2/21 5/9 9/3 9/5 10/20 13/4 14/5 14/7 17/9 25/1 31/20 36/7 36/21 41/17 49/25 59/1 60/2 79/12 82/25 86/14 87/16 87/22 90/16 90/22 94/20 101/13 108/8 108/8 112/9 114/10 115/23 122/6 123/18 124/15 131/4 131/6 149/11 151/6 152/5 156/25 157/2 draft [8] 24/23 28/8 28/10 31/5 34/25 60/22 61/9 95/4 drafted [2] 28/13 29/13 drafting [1] 60/16 dragged [1] 19/13 draw [4] 36/2 136/21 148/19 150/7 drawing [5] 29/25	each [13] 37/22 50/25 59/6 61/6 61/6 61/9 61/11 83/25 85/7 91/22 91/24 95/24 145/9 eagerly [1] 6/13 earlier [12] 27/25 30/2 40/3 41/2 46/20 65/5 79/3 83/14 107/4 108/14 146/17 178/4 early [5] 15/22 36/17 64/25 79/11 168/5 earner [2] 18/14 22/5 ears [1] 143/6 easily [1] 43/5 easy [2] 61/12 84/5 edifice [1] 112/10 edit [1] 115/4 effect [1] 31/3 effectively [1] 129/7 effects [1] 113/16 eg [1] 85/3 eg something [1] 85/3 Eggleton [1] 172/21 either [12] 28/14 51/12 78/16 97/5 103/14 103/23 106/12 126/3 145/25 147/4 166/21 179/20 eject [1] 116/19 Elaine [2] 131/6 133/22 elderly [2] 14/4 113/7 element [4] 13/18 15/15 63/9 73/15 elements [2] 73/22 108/19 eligible [3] 20/21		

E	example [6] 11/4 100/18 122/4 122/8 130/9 143/3 exceed [1] 136/9 excess [1] 124/20 exchange [4] 91/16 91/25 94/9 106/11 excluded [1] 53/3 ExCo [7] 75/7 77/15 78/11 80/3 80/16 81/4 81/22 Executive [14] 64/2 64/15 66/12 75/7 75/9 75/10 75/12 75/12 75/14 107/21 107/22 108/10 109/8 167/22 exerted [1] 11/4 exhaustively [1] 114/13 existence [1] 129/11 existential [3] 143/21 144/1 144/23 existing [1] 147/10 exists [1] 87/3 exit [4] 26/3 116/24 117/15 117/17 expand [1] 120/20 expect [4] 67/4 68/23 71/23 152/15 expectation [7] 34/16 62/8 62/14 70/21 76/8 152/25 154/17 expectations [1] 71/24 expected [16] 42/8 44/16 47/19 47/21 48/9 66/18 68/7 77/16 78/6 80/10 81/7 129/23 132/18 134/12 159/2 165/13 expenditure [1] 179/7 experience [5] 117/12 141/3 142/4 142/8 179/5 experienced [1] 166/12 expertise [1] 48/20 experts [2] 107/9 109/6 explain [2] 19/25 38/1 explained [7] 57/16 58/1 61/12 63/24 157/19 164/15 165/24 explaining [1] 153/7 explanation [5] 110/24 111/1 124/24 146/13 174/16 explicitly [1] 56/17 exposed [3] 62/9 173/23 173/24 exposure [2] 62/19	76/7 expressed [5] 48/10 69/23 94/3 119/9 146/21 expresses [1] 146/18 expressing [3] 90/11 94/21 180/25 expression [1] 97/11 extending [1] 86/19 extent [5] 46/24 59/17 59/21 59/25 62/19 extra [4] 41/24 124/3 132/5 147/9 extracted [2] 121/9 146/1 extremely [1] 18/12 eyes [1] 143/5	F face [4] 15/6 51/23 92/22 125/17 faceless [1] 11/17 facilitate [9] 22/7 22/25 24/1 24/4 26/15 32/13 33/14 40/5 59/9 facilitated [1] 44/5 facilitating [2] 32/3 109/3 facility [1] 152/17 fact [31] 19/8 31/21 34/9 37/14 47/15 49/2 53/17 55/10 57/17 58/1 72/5 78/22 78/23 88/16 99/23 103/21 105/13 106/8 110/14 112/24 117/22 124/18 125/24 125/25 127/2 130/20 133/17 145/3 145/23 149/9 162/1 facts [6] 13/6 121/12 130/11 139/4 139/4 139/10 fail [2] 37/6 38/9 failed [2] 103/14 103/14 failing [1] 172/19 fair [6] 97/20 134/24 141/2 152/13 152/23 159/17 faith [1] 69/25 Falcon [2] 177/5 177/10 falling [1] 166/22 false [3] 114/3 122/25 123/3 familiar [3] 42/6 91/15 101/15 families [2] 174/8 174/18 family [26] 2/11 3/19 12/3 13/2 14/1 15/3 17/4 18/7 18/11 18/14 18/15 18/22 19/9	19/21 20/16 21/17 22/4 22/11 23/18 24/21 26/16 32/13 33/9 34/13 113/15 164/7 far [7] 38/18 38/20 98/9 102/25 125/9 128/23 175/18 Farm [2] 1/23 28/11 fault [10] 6/12 108/14 108/22 114/17 149/10 151/17 153/4 154/14 169/14 170/2 faults [3] 165/3 165/9 166/7 feasible [1] 112/8 February [17] 3/10 45/11 63/15 67/23 75/5 80/17 81/4 81/9 81/23 95/19 96/2 96/5 107/5 122/8 131/5 146/4 177/18 February 2014 [1] 67/23 fed [1] 144/11 Federation [2] 140/14 140/18 feedback [3] 54/1 81/8 120/2 feeding [1] 31/24 feel [1] 6/17 feeling [1] 18/17 feelings [1] 146/25 fees [1] 179/23 feet [1] 145/5 felt [5] 32/6 32/12 74/4 141/19 161/7 Ferndown [6] 40/2 61/15 105/8 105/9 109/10 142/16 few [5] 65/2 95/19 142/17 157/10 161/12 field [2] 66/20 109/1 fight [1] 180/6 fighting [1] 9/1 figure [5] 20/14 20/15 35/6 122/15 123/24 figures [8] 7/10 56/18 57/6 64/11 83/9 83/24 85/3 124/13 file [8] 57/17 58/1 114/6 121/23 123/6 125/10 126/6 128/7 files [5] 127/12 127/13 127/18 127/22 128/14 final [7] 22/14 25/15 26/11 117/25 122/24 136/6 146/23 Finance [3] 75/24 85/12 85/24 financial [8] 3/19 5/25 18/20 19/7 22/4	76/7 114/4 142/18 financially [4] 18/16 32/14 111/16 179/22 find [12] 13/6 13/11 28/8 86/25 101/6 102/15 124/12 126/15 158/2 164/1 164/6 172/3 finding [3] 55/15 163/12 165/14 findings [5] 27/19 61/12 61/13 62/23 95/13 finds [1] 27/9 fine [3] 6/19 118/23 162/25 finish [1] 179/17 finished [1] 1/8 firm [1] 77/13 firmly [1] 18/23 first [26] 14/8 14/13 15/2 15/11 15/13 31/20 36/16 37/14 46/4 48/16 60/22 72/3 87/17 92/20 97/1 97/2 100/5 118/22 119/2 120/19 128/5 129/11 140/13 140/19 159/3 181/23 firstly [2] 1/22 119/8 fit [1] 145/3 fitting [1] 4/8 five [3] 67/23 116/15 161/15 flagging [1] 45/12 flavour [1] 37/4 flawed [2] 84/3 112/17 flexibility [2] 32/7 33/19 flow [3] 39/11 40/5 55/19 focus [8] 73/16 74/20 75/1 79/19 80/1 81/18 120/7 179/19 focused [5] 74/16 74/22 74/23 79/21 121/1 followed [2] 109/7 109/9 following [8] 11/3 27/8 37/3 84/20 99/17 99/19 112/5 124/20 follows [4] 87/21 102/16 113/23 157/5 font [1] 86/14 foot [6] 2/21 5/16 38/24 40/9 41/17 55/23 footballer [1] 92/23 footing [1] 77/12 footprint [2] 105/20 136/14 forced [1] 79/9
----------	---	---	--	--	--

F	friendly [1] 64/3	143/24 177/25	Gina Griffiths [2]	110/25 111/10 111/22
Forde [3] 91/19 92/4 92/6	friends [1] 164/7	general [13] 26/4	21/2 21/22	114/22 117/17 130/4
forefront [1] 54/12	front [7] 10/7 10/23 11/25 14/18 14/23 15/19 32/25	36/5 56/2 56/20 63/18 65/20 65/22 67/19 120/20 120/21 139/21 142/25 170/24	giro [2] 8/18 10/1	131/6 131/7 131/8
foreign [6] 91/14 91/16 91/22 91/25 92/2 92/9	FUJ00229801 [2] 39/18 40/6	generally [2] 66/23 88/10	give [19] 21/15 29/17 32/6 32/9 33/19 37/3 37/11 45/9 84/25 94/10 94/17 95/1 97/6 97/13 129/8 130/5 138/24 161/20 175/7	134/22 137/8 146/12 151/12 156/9 156/15 156/16 159/20 163/24 164/10 165/16 168/5 170/2 170/22 171/25 173/3 173/9 174/12 175/16
forensic [1] 77/13	Fujitsu [22] 37/10 37/21 39/24 40/1 40/19 41/16 42/11 42/15 56/17 105/19 107/11 110/4 111/7 115/4 115/15 115/19 116/11 134/4 134/6 166/13 166/17 166/22	generated [14] 37/6 44/9 50/24 51/25 56/11 110/17 131/15 134/21 135/8 139/5 140/7 145/24 145/24 147/12	given [22] 13/18 40/15 52/17 61/21 81/12 81/14 82/2 84/3 95/23 97/12 99/14 99/23 99/23 108/3 108/25 127/17 139/21 149/23 152/3 159/15 159/22 164/5	157/12 157/15 157/20 157/21 157/25 158/21 158/25 165/4
forget [2] 74/9 153/24	Fujitsu/Credence [3] 41/16 134/4 134/6	generating [2] 61/24 171/7	gives [3] 20/4 85/2 98/25	gone [10] 39/9 42/5 48/23 49/8 94/13 99/7 111/17 125/5 126/18 175/17
forgive [1] 12/8	full [13] 22/14 25/15 26/11 42/16 112/19 121/2 121/25 122/1 123/5 123/6 123/21 138/24 178/21	generic [1] 86/11	giving [9] 41/25 43/13 47/17 84/24 95/20 130/22 132/7 139/9 167/14	gong [1] 112/4
forgotten [1] 44/6	fully [4] 112/3 121/7 132/10 147/1	generically [1] 136/18	glean [1] 72/16	good [15] 1/6 1/6 140/17 141/13 149/2 149/8 156/5 156/6 157/15 157/20 157/21 157/25 158/21 158/25 165/4
form [1] 97/18	function [2] 99/19 167/7	genuine [6] 61/16 61/18 63/3 63/5 70/3 103/2	Glenn [6] 2/23 14/16 16/7 16/10 17/3 33/1	111/17 125/5 126/18 175/17
formal [5] 34/24 40/12 62/2 97/13 147/14	functionality [1] 115/3	genuinely [4] 15/2 21/15 70/14 102/25	GLO [4] 178/9 179/2 179/8 180/9	got [48] 4/5 10/6 11/24 12/13 14/13 15/3 18/1 30/11 33/7 44/21 64/22 71/5 77/7 79/4 90/20 93/18 106/24 107/9 108/24 115/13 115/16 116/12 116/14 118/16 127/23 127/25 138/12 151/2 151/6 152/13 156/5 156/6 160/3 160/12 163/13 163/19 164/25 165/21 172/17 173/2 173/3 173/3 173/4 173/6 173/14 175/6 177/7 180/17
formally [1] 40/16	funder [2] 179/24 180/3	get [61] 8/18 8/23 13/9 14/4 14/8 18/15 19/17 20/3 22/2 30/17 32/5 33/15 37/8 37/19 40/1 40/19 42/4 42/24 42/25 44/5 44/7 48/23 52/19 54/19 54/20 55/18 63/5 63/8 63/12 66/24 70/15 70/16 75/22 79/19 80/1 80/1 80/8 88/8 96/25 101/4 109/6 110/4 111/7 116/7 121/16 128/12 136/7 151/14 152/8 152/16 152/25 163/9 165/18 165/18 169/24 169/25 170/4 172/14 173/1 174/1 180/5	global [1] 85/3	Gosh [1] 174/5
formed [2] 120/15 173/4	funders [1] 180/11	gets [1] 93/8	go [71] 20/4 20/25 24/11 38/23 39/18 41/6 43/8 43/10 43/22 44/25 48/10 49/24 52/10 55/23 57/2 59/13 63/20 64/21 70/14 72/1 76/2 81/12 84/13 86/5 86/6 87/15 90/23 93/18 95/3 101/7 104/3 105/15 107/18 107/18 108/8 108/8 109/19 114/8 114/25 117/4 117/8 119/19 122/3 122/5 123/15 123/17 123/25 124/9 124/15 127/4 128/1 131/2 131/4 131/24 133/13 133/16 133/20 135/25 136/2 145/19 145/20 146/14 147/5 147/20 151/20 156/17 162/5 174/25 177/15 179/11 179/11	governance [1] 166/24
formulated [1] 67/11	further [32] 12/4 19/6 29/14 43/23 46/17 49/21 57/11 65/10 73/1 87/22 94/9 94/14 95/4 97/21 98/16 101/5 101/9 101/13 102/1 102/14 106/10 106/15 106/24 111/24 133/13 133/16 133/20 146/15 154/20 156/25 157/3 181/19	getting [29] 14/7 39/25 42/22 48/16 62/5 62/6 64/23 65/4 72/21 74/16 74/20 79/5 79/7 80/1 80/12 92/24 93/1 93/2 93/12 93/14 117/2 129/1 134/9 166/13 175/1 175/2 176/14 176/16 178/1	GLO [4] 178/9 179/2 179/8 180/9	governing [1] 167/21
formulating [1] 67/10	future [2] 40/17 86/21	ghostly [1] 99/10	go [71] 20/4 20/25 24/11 38/23 39/18 41/6 43/8 43/10 43/22 44/25 48/10 49/24 52/10 55/23 57/2 59/13 63/20 64/21 70/14 72/1 76/2 81/12 84/13 86/5 86/6 87/15 90/23 93/18 95/3 101/7 104/3 105/15 107/18 107/18 108/8 108/8 109/19 114/8 114/25 117/4 117/8 119/19 122/3 122/5 123/15 123/17 123/25 124/9 124/15 127/4 128/1 131/2 131/4 131/24 133/13 133/16 133/20 135/25 136/2 145/19 145/20 146/14 147/5 147/20 151/20 156/17 162/5 174/25 177/15 179/11 179/11	government [3] 144/12 169/18 181/1
fortnight [1] 5/10	G	gigantic [1] 66/22	global [1] 85/3	grand [1] 152/9
forward [12] 15/4 19/12 24/3 27/5 32/11 38/23 40/17 53/8 101/10 108/19 130/9 134/22	gain [1] 77/15	Gilliland [3] 13/10 104/5 105/8	go [71] 20/4 20/25 24/11 38/23 39/18 41/6 43/8 43/10 43/22 44/25 48/10 49/24 52/10 55/23 57/2 59/13 63/20 64/21 70/14 72/1 76/2 81/12 84/13 86/5 86/6 87/15 90/23 93/18 95/3 101/7 104/3 105/15 107/18 107/18 108/8 108/8 109/19 114/8 114/25 117/4 117/8 119/19 122/3 122/5 123/15 123/17 123/25 124/9 124/15 127/4 128/1 131/2 131/4 131/24 133/13 133/16 133/20 135/25 136/2 145/19 145/20 146/14 147/5 147/20 151/20 156/17 162/5 174/25 177/15 179/11 179/11	grateful [2] 72/20 114/5
forwarded [8] 17/11 41/6 72/24 86/12 101/22 106/13 106/24 106/25	gained [1] 178/22	Gina [21] 21/2 21/9 21/20 21/22 23/22 24/4 24/24 26/15 26/19 30/3 31/18 32/4 33/15 33/19 34/4 34/7 34/8 34/16 34/20 34/22 34/25	glean [1] 72/16	Great [3] 1/23 155/19 160/10
forwarding [6] 16/17 16/25 17/5 45/11 55/8 106/16	gaining [1] 55/3		Glenn [6] 2/23 14/16 16/7 16/10 17/3 33/1	greater [1] 48/12
forwards [4] 5/10 13/5 25/24 53/6	Gale [1] 14/21		GLO [4] 178/9 179/2 179/8 180/9	Green [1] 138/21
found [10] 7/15 8/2 9/11 9/17 9/19 51/11 92/20 113/9 138/9 158/12	gap [3] 70/19 70/20 76/8		global [1] 85/3	Griffiths [44] 1/13 1/18 1/22 2/5 2/11 2/14 2/20 2/22 3/5 5/17 5/17 5/21 8/5 8/5 8/8 8/10 8/16 8/23 9/1 9/3 9/6 9/18 10/6 10/15 10/19 10/22 11/14 13/22 21/2 21/22 22/24 22/25 24/14 24/18 28/14 28/15 29/10 29/12 29/19 30/8 32/15 33/6 34/1 142/17
four [6] 3/18 95/12 116/16 116/17 118/17 152/24	garden [1] 26/2		go [71] 20/4 20/25 24/11 38/23 39/18 41/6 43/8 43/10 43/22 44/25 48/10 49/24 52/10 55/23 57/2 59/13 63/20 64/21 70/14 72/1 76/2 81/12 84/13 86/5 86/6 87/15 90/23 93/18 95/3 101/7 104/3 105/15 107/18 107/18 108/8 108/8 109/19 114/8 114/25 117/4 117/8 119/19 122/3 122/5 123/15 123/17 123/25 124/9 124/15 127/4 128/1 131/2 131/4 131/24 133/13 133/16 133/20 135/25 136/2 145/19 145/20 146/14 147/5 147/20 151/20 156/17 162/5 174/25 177/15 179/11 179/11	governance [1] 166/24
four years [1] 3/18	Gareth [16] 40/7 40/25 41/7 41/18 41/20 45/12 49/9 110/9 131/7 132/1 133/15 142/16 145/12 146/3 146/5 146/11		glean [1] 72/16	governing [1] 167/21
fourth [3] 8/3 78/13 157/2	gather [1] 31/13		Glenn [6] 2/23 14/16 16/7 16/10 17/3 33/1	government [3] 144/12 169/18 181/1
foxes [1] 117/10	gave [6] 129/25 130/6 139/3 139/10		GLO [4] 178/9 179/2 179/8 180/9	grand [1] 152/9
frankly [1] 174/4			global [1] 85/3	grateful [2] 72/20 114/5
Fraser [9] 138/9 143/25 148/7 161/21 161/21 162/15 178/18 179/4 180/12			go [71] 20/4 20/25 24/11 38/23 39/18 41/6 43/8 43/10 43/22 44/25 48/10 49/24 52/10 55/23 57/2 59/13 63/20 64/21 70/14 72/1 76/2 81/12 84/13 86/5 86/6 87/15 90/23 93/18 95/3 101/7 104/3 105/15 107/18 107/18 108/8 108/8 109/19 114/8 114/25 117/4 117/8 119/19 122/3 122/5 123/15 123/17 123/25 124/9 124/15 127/4 128/1 131/2 131/4 131/24 133/13 133/16 133/20 135/25 136/2 145/19 145/20 146/14 147/5 147/20 151/20 156/17 162/5 174/25 177/15 179/11 179/11	Great [3] 1/23 155/19 160/10
Fraser's [1] 100/4			glean [1] 72/16	greater [1] 48/12
fraud [5] 151/12 151/17 151/24 152/1 177/11			Glenn [6] 2/23 14/16 16/7 16/10 17/3 33/1	Green [1] 138/21
fraudulent [1] 167/2			GLO [4] 178/9 179/2 179/8 180/9	Griffiths [44] 1/13 1/18 1/22 2/5 2/11 2/14 2/20 2/22 3/5 5/17 5/17 5/21 8/5 8/5 8/8 8/10 8/16 8/23 9/1 9/3 9/6 9/18 10/6 10/15 10/19 10/22 11/14 13/22 21/2 21/22 22/24 22/25 24/14 24/18 28/14 28/15 29/10 29/12 29/19 30/8 32/15 33/6 34/1 142/17
freedom [1] 116/5			global [1] 85/3	governance [1] 166/24
Freeths [3] 179/22 180/3 180/10			go [71] 20/4 20/25 24/11 38/23 39/18 41/6 43/8 43/10 43/22 44/25 48/10 49/24 52/10 55/23 57/2 59/13 63/20 64/21 70/14 72/1 76/2 81/12 84/13 86/5 86/6 87/15 90/23 93/18 95/3 101/7 104/3 105/15 107/18 107/18 108/8 108/8 109/19 114/8 114/25 117/4 117/8 119/19 122/3 122/5 123/15 123/17 123/25 124/9 124/15 127/4 128/1 131/2 131/4 131/24 133/13 133/16 133/20 135/25 136/2 145/19 145/20 146/14 147/5 147/20 151/20 156/17 162/5 174/25 177/15 179/11 179/11	governing [1] 167/21
fresh [1] 52/18			glean [1] 72/16	government [3] 144/12 169/18 181/1
Friday [4] 1/1 11/21 101/5 102/15			Glenn [6] 2/23 14/16 16/7 16/10 17/3 33/1	grand [1] 152/9

G	36/12 37/15 38/5 39/12 40/15 49/21 58/7 58/21 62/7 66/12 67/5 71/12 78/10 118/5 125/9 125/13 126/15 126/22 128/13 128/20 130/9 132/16 134/10 134/19 136/15 139/16 139/19 152/16 160/11 160/15 162/9 162/13 165/20	he [129] 2/1 3/3 8/16 8/17 8/24 8/24 9/19 10/10 10/14 11/11 11/16 11/18 11/19 11/20 11/21 11/23 11/24 12/1 12/10 14/23 16/1 16/2 16/17 20/18 20/20 20/21 20/21 20/22 20/23 21/3 22/6 25/3 29/9 30/21 30/22 30/25 31/11 31/21 32/20 38/11 38/12 39/2 39/3 39/16 39/17 39/25 39/25 51/25 52/16 52/24 53/2 53/14 56/6 74/4 74/6 86/14 90/12 90/15 92/16 92/18 92/19 92/25 93/1 93/1 93/6 93/8 93/10 93/11 93/13 94/3 94/5 94/5 94/7 94/14 94/14 94/15 94/21 94/24 94/24 94/24 95/4 95/6 95/16 95/16 95/17 95/18 95/18 96/8 102/23 109/23 109/23 110/1 110/4 112/2 113/7 113/10 113/12 113/16 113/18 113/19 113/23 120/15 120/16 120/23 120/25 121/2 123/10 125/2 125/2 130/13 131/11 131/19 133/17 137/22 137/22 137/25 138/9 139/7 139/7 141/17 146/12 146/13 147/6 156/2 158/12 162/17 162/18 180/12 180/13	held [6] 63/22 84/7 85/8 92/10 114/18 131/13 Helen [51] 36/16 39/20 39/22 40/2 41/2 41/7 41/18 41/19 42/6 44/3 44/15 45/25 46/6 46/11 46/12 46/15 46/25 47/6 47/6 47/14 47/19 47/21 48/6 48/19 49/9 49/22 56/25 57/16 57/25 58/3 58/8 58/19 58/22 104/5 104/6 104/8 110/8 119/6 119/6 130/19 131/5 131/9 131/25 132/16 133/18 133/20 134/11 145/17 146/3 147/7 147/23 Helen's [4] 39/23 45/23 48/20 132/21 Hello [1] 11/12 help [22] 13/6 14/1 15/10 32/13 40/11 40/12 40/16 42/11 73/2 75/10 151/15 151/21 153/1 156/3 162/6 165/9 165/14 165/18 166/20 167/15 171/15 178/1 helped [4] 154/11 155/4 166/7 166/17 helpful [5] 12/19 55/2 168/12 169/12 169/15 helpline [34] 149/7 149/12 150/11 150/19 151/2 151/5 151/15 151/16 151/20 154/17 154/25 155/11 156/2 156/5 156/22 157/4 158/6 158/9 158/13 158/16 159/6 159/24 160/3 163/16 164/23 166/1 166/25 167/1 167/18 174/25 175/3 175/4 175/5 176/12 helps [1] 121/16 Henderson [5] 50/13 50/14 52/12 63/17 83/7 Henry [9] 97/1 97/2 98/21 99/4 116/16 118/9 129/20 133/5 183/6 her [97] 4/24 4/24 5/18 19/2 21/18 21/19 21/20 21/22 23/22 24/8 24/9 26/19 29/20 30/4 30/5 30/9 30/9 30/15 30/16 30/25 31/1 31/18 32/6 32/8 32/9 32/10 34/9 34/11 36/12 40/4 42/8 42/9 42/14 42/20 44/16	44/17 45/5 45/12 46/1 47/20 47/21 48/1 48/6 48/8 48/9 48/10 48/10 48/21 51/7 51/10 56/8 57/11 68/3 72/19 74/10 79/7 96/1 97/15 101/21 101/24 102/3 109/16 125/18 126/1 132/18 132/18 132/22 132/23 133/2 134/12 134/12 145/5 155/22 155/25 155/25 157/15 157/20 158/21 158/24 159/8 160/11 160/12 160/13 160/16 160/18 160/19 160/21 160/21 160/22 161/7 161/11 161/14 161/15 177/7 177/13 177/14 177/17 here [61] 14/9 14/13 15/12 15/19 17/4 17/7 17/16 17/20 19/23 20/17 20/17 20/25 21/5 22/5 26/13 32/1 34/18 38/5 38/16 39/12 40/15 40/18 40/21 41/7 49/17 50/21 50/24 51/14 52/21 53/11 56/21 58/12 58/15 65/11 66/13 69/23 79/1 81/8 86/13 94/22 95/7 104/14 109/1 109/21 110/2 119/4 136/3 136/10 136/18 142/13 143/3 144/22 146/3 146/21 147/22 151/12 159/2 160/3 173/9 173/20 177/3 here's [3] 50/19 90/20 91/13 hers [1] 157/22 Hi [3] 117/7 132/1 146/5 hid [1] 9/3 hierarchy [2] 11/15 16/20 high [18] 11/7 83/10 83/24 100/2 149/18 151/4 151/9 159/10 159/11 159/23 162/4 163/5 163/12 163/13 178/6 178/7 179/6 179/8 higher [4] 99/5 99/5 99/13 99/13 highlighted [1] 140/5 highly [2] 83/8 117/13 hijack [2] 72/17 73/11 him [37] 8/18 9/11 9/14 9/22 11/15 11/18 12/2 12/4 12/12 12/13	
H	36/12 37/15 38/5 39/12 40/15 49/21 58/7 58/21 62/7 66/12 67/5 71/12 78/10 118/5 125/9 125/13 126/15 126/22 128/13 128/20 130/9 132/16 134/10 134/19 136/15 139/16 139/19 152/16 160/11 160/15 162/9 162/13 165/20	hard [8] 76/9 76/11 76/13 76/25 77/3 77/7 77/16 180/23 hardening [2] 74/11 74/14 hardly [2] 180/21 180/24 hardship [1] 122/9 harm [1] 174/7 harrowing [2] 113/16 113/17 harsh [1] 6/17 has [59] 3/15 4/1 5/23 6/18 11/14 11/23 12/6 14/9 17/6 18/7 18/8 18/11 18/15 18/22 19/8 19/13 19/14 19/15 26/11 28/12 28/13 28/17 29/11 50/12 53/13 56/8 66/12 76/9 78/10 78/10 87/4 87/10 92/3 92/4 94/13 95/25 97/14 100/2 101/14 118/6 122/21 127/21 130/12 131/5 133/17 137/6 157/13 157/17 157/20 158/2 158/8 158/12 158/13 160/10 160/15 160/18 164/4 173/14 177/13 hasn't [2] 93/14 100/3 hasten [1] 145/7 hatch [1] 8/9 have [294] haven't [6] 90/25 102/21 103/23 136/4 152/24 174/3 having [15] 23/22 34/19 39/25 40/2 77/8 91/2 115/19 124/11 128/14 130/14 157/10 157/23 166/15 168/6 169/25	he'd [11] 14/18 30/19 30/22 32/1 33/2 39/5 69/19 92/13 102/17 113/4 162/5 he's [7] 51/16 51/18 52/4 53/4 58/14 83/11 87/9 head [5] 8/15 16/1 30/16 31/19 172/7 headache [1] 86/14 headed [2] 72/5 171/24 health [4] 13/22 54/12 113/16 174/8 hear [5] 7/13 139/17 143/6 143/7 162/20 heard [9] 14/16 19/3 31/20 75/11 90/8 97/10 128/21 150/15 150/23 hearing [3] 72/6 123/1 182/8 hearings [1] 178/21 heavy [1] 103/2	held [6] 63/22 84/7 85/8 92/10 114/18 131/13 Helen [51] 36/16 39/20 39/22 40/2 41/2 41/7 41/18 41/19 42/6 44/3 44/15 45/25 46/6 46/11 46/12 46/15 46/25 47/6 47/6 47/14 47/19 47/21 48/6 48/19 49/9 49/22 56/25 57/16 57/25 58/3 58/8 58/19 58/22 104/5 104/6 104/8 110/8 119/6 119/6 130/19 131/5 131/9 131/25 132/16 133/18 133/20 134/11 145/17 146/3 147/7 147/23 Helen's [4] 39/23 45/23 48/20 132/21 Hello [1] 11/12 help [22] 13/6 14/1 15/10 32/13 40/11 40/12 40/16 42/11 73/2 75/10 151/15 151/21 153/1 156/3 162/6 165/9 165/14 165/18 166/20 167/15 171/15 178/1 helped [4] 154/11 155/4 166/7 166/17 helpful [5] 12/19 55/2 168/12 169/12 169/15 helpline [34] 149/7 149/12 150/11 150/19 151/2 151/5 151/15 151/16 151/20 154/17 154/25 155/11 156/2 156/5 156/22 157/4 158/6 158/9 158/13 158/16 159/6 159/24 160/3 163/16 164/23 166/1 166/25 167/1 167/18 174/25 175/3 175/4 175/5 176/12 helps [1] 121/16 Henderson [5] 50/13 50/14 52/12 63/17 83/7 Henry [9] 97/1 97/2 98/21 99/4 116/16 118/9 129/20 133/5 183/6 her [97] 4/24 4/24 5/18 19/2 21/18 21/19 21/20 21/22 23/22 24/8 24/9 26/19 29/20 30/4 30/5 30/9 30/9 30/15 30/16 30/25 31/1 31/18 32/6 32/8 32/9 32/10 34/9 34/11 36/12 40/4 42/8 42/9 42/14 42/20 44/16	44/17 45/5 45/12 46/1 47/20 47/21 48/1 48/6 48/8 48/9 48/10 48/10 48/21 51/7 51/10 56/8 57/11 68/3 72/19 74/10 79/7 96/1 97/15 101/21 101/24 102/3 109/16 125/18 126/1 132/18 132/18 132/22 132/23 133/2 134/12 134/12 145/5 155/22 155/25 155/25 157/15 157/20 158/21 158/24 159/8 160/11 160/12 160/13 160/16 160/18 160/19 160/21 160/21 160/22 161/7 161/11 161/14 161/15 177/7 177/13 177/14 177/17 here [61] 14/9 14/13 15/12 15/19 17/4 17/7 17/16 17/20 19/23 20/17 20/17 20/25 21/5 22/5 26/13 32/1 34/18 38/5 38/16 39/12 40/15 40/18 40/21 41/7 49/17 50/21 50/24 51/14 52/21 53/11 56/21 58/12 58/15 65/11 66/13 69/23 79/1 81/8 86/13 94/22 95/7 104/14 109/1 109/21 110/2 119/4 136/3 136/10 136/18 142/13 143/3 144/22 146/3 146/21 147/22 151/12 159/2 160/3 173/9 173/20 177/3 here's [3] 50/19 90/20 91/13 hers [1] 157/22 Hi [3] 117/7 132/1 146/5 hid [1] 9/3 hierarchy [2] 11/15 16/20 high [18] 11/7 83/10 83/24 100/2 149/18 151/4 151/9 159/10 159/11 159/23 162/4 163/5 163/12 163/13 178/6 178/7 179/6 179/8 higher [4] 99/5 99/5 99/13 99/13 highlighted [1] 140/5 highly [2] 83/8 117/13 hijack [2] 72/17 73/11 him [37] 8/18 9/11 9/14 9/22 11/15 11/18 12/2 12/4 12/12 12/13

H	134/7 135/18 138/8 142/7 143/20 143/21 144/11 146/1 147/1 164/22 165/1 165/3 165/9 166/8 168/4 171/1 171/6 171/18 172/24 173/6 173/11 173/16 174/6 174/23 178/19	128/25 I await [1] 7/13 I became [3] 44/23 142/20 171/6 I been [1] 129/15 I believe [5] 4/1 35/25 36/10 161/17 171/4 I believed [3] 100/13 100/19 139/3 I brought [1] 175/10 I can [13] 41/21 43/22 49/18 72/16 81/11 97/13 99/1 116/14 128/1 132/2 135/17 145/15 146/6 I can't [15] 4/15 46/16 69/6 71/21 71/24 85/16 86/25 102/24 103/17 109/13 120/18 127/22 128/14 129/16 148/9 I cannot [4] 18/21 45/22 47/4 93/11 I clearly [1] 103/10 I consider [1] 18/12 I continued [1] 176/20 I could [5] 21/16 32/6 32/13 33/15 128/17 I couldn't [2] 46/21 46/22 I covered [1] 65/5 I decided [1] 181/6 I definitely [1] 46/22 I did [14] 21/7 32/1 44/4 44/4 45/24 46/2 47/4 49/6 52/21 66/6 128/15 128/18 175/9 181/6 I didn't [33] 10/4 15/1 22/5 30/10 44/14 46/15 58/25 66/18 77/18 77/19 83/14 90/7 102/20 103/17 103/18 104/17 104/18 104/21 104/22 112/12 112/22 121/10 127/19 128/15 128/25 130/9 132/20 135/21 139/17 148/7 148/7 160/25 179/10 I disagree [1] 106/4 I discussed [1] 31/18 I do [11] 34/2 40/13 72/14 87/23 93/15 98/10 98/13 143/9 146/22 147/19 160/17 I don't [52] 2/3 4/5 15/13 17/15 20/3 41/14 43/18 43/21 44/2 44/3 44/15 44/20 48/8 49/4 49/6 65/7 66/11 67/5 69/6 69/18	70/19 71/19 71/22 74/24 76/18 81/8 100/1 100/9 101/2 102/20 102/23 106/21 124/5 125/5 126/4 127/7 127/13 127/17 129/14 129/24 136/2 136/23 145/7 147/2 148/6 148/11 151/21 155/10 155/13 155/16 165/6 168/1 I enjoyed [1] 3/8 I ever [1] 89/6 I expected [7] 42/8 44/16 47/19 48/9 78/6 132/18 134/12 I extracted [1] 121/9 I feel [1] 6/17 I felt [3] 32/6 32/12 141/19 I finish [1] 179/17 I firmly [1] 18/23 I forget [1] 153/24 I forwarded [1] 106/13 I fully [1] 147/1 I gather [1] 31/13 I gave [2] 139/3 139/10 I genuinely [1] 102/25 I go [1] 64/21 I got [10] 14/13 15/3 30/11 64/22 79/4 106/24 107/9 116/12 138/12 172/17 I had [21] 3/2 16/25 17/13 21/8 21/9 23/24 30/7 44/2 48/8 49/6 61/16 104/18 106/22 107/8 116/13 126/19 129/4 130/8 134/16 142/4 172/16 I hadn't [5] 86/8 103/10 106/20 116/20 164/16 I hasten [1] 145/7 I have [27] 3/6 3/9 3/17 3/21 13/11 16/24 19/3 43/11 44/3 44/22 45/22 46/17 50/20 71/23 72/6 96/21 101/6 101/9 102/14 102/15 134/17 136/5 143/10 146/6 148/8 178/22 178/22 I haven't [3] 90/25 102/21 152/24 I heard [2] 14/16 31/20 I it [1] 115/12 I just [12] 2/17 8/1 10/17 31/22 35/23 36/8 97/3 112/2 129/2	130/7 140/19 145/13 I knew [2] 14/13 116/25 I know [11] 12/10 22/19 39/2 90/17 90/18 106/22 132/8 133/10 143/11 162/11 164/18 I learned [1] 6/6 I learnt [1] 6/9 I left [1] 17/1 I look [1] 40/16 I looked [2] 127/22 175/20 I made [1] 100/13 I managed [2] 171/21 171/22 I may [3] 45/25 115/16 119/1 I mean [30] 6/19 15/8 17/5 21/7 22/5 22/19 26/7 26/17 28/23 29/23 29/24 32/3 34/17 40/22 42/4 77/2 77/4 79/22 79/22 95/7 107/13 108/5 116/25 128/15 129/23 130/7 142/24 143/8 153/24 165/17 I met [6] 21/18 21/20 21/21 21/22 161/9 161/13 I might [1] 16/15 I move [1] 82/21 I need [5] 16/12 16/16 16/23 17/2 111/1 I never [2] 107/9 161/9 I note [1] 25/11 I only [1] 5/1 I personally [1] 5/24 I presented [1] 125/7 I presume [4] 30/19 76/12 90/5 128/12 I presumed [1] 30/25 I propose [1] 98/22 I pulled [3] 121/12 127/14 127/21 I put [2] 46/17 178/2 I reached [1] 41/3 I read [5] 43/15 43/15 43/17 43/21 127/12 I realise [2] 47/7 86/13 I received [1] 11/3 I recognised [1] 176/14 I referred [2] 128/15 136/12 I remember [3] 29/4 141/25 168/17 I remind [1] 97/20 I represent [1] 149/3
him... [27] 12/14 12/15 12/20 16/17 17/1 17/1 18/10 20/21 21/4 39/2 39/5 39/12 49/9 91/13 93/2 93/4 93/8 94/1 94/6 94/8 95/3 95/14 110/3 110/12 141/25 146/18 162/5 himself [3] 11/23 86/16 162/6 his [67] 2/1 2/8 2/11 2/14 8/5 8/12 8/15 10/6 10/7 10/13 10/15 11/19 11/24 12/11 12/16 13/22 14/3 14/3 14/3 14/4 16/2 17/10 18/2 20/22 21/6 21/9 21/9 22/8 22/9 23/2 25/5 28/17 29/2 29/5 32/16 32/21 33/4 50/12 50/23 51/7 51/10 52/22 63/20 85/12 90/9 90/9 90/11 92/17 93/6 94/7 94/21 94/25 95/14 109/25 113/7 113/9 113/14 113/14 113/15 120/25 121/3 126/15 127/6 146/18 154/8 178/18 179/4 Historical [1] 181/9 hit [1] 8/24 HJA [1] 97/2 hm [4] 9/13 89/15 120/24 153/13 Hobbs [7] 101/6 101/17 101/21 102/11 102/16 109/10 110/18 hold [2] 18/9 24/7 holds [1] 18/17 holistically [1] 73/19 Holt [1] 10/25 home [1] 160/23 honest [2] 141/14 142/2 Hooper [4] 69/17 69/24 79/24 141/16 hope [3] 1/22 28/11 86/17 hoping [1] 155/11 Horizon [60] 2/12 3/7 3/25 6/12 32/22 33/6 37/6 37/8 45/13 50/25 51/5 57/18 61/21 61/24 71/1 92/2 92/8 101/10 101/20 104/6 107/8 108/2 111/19 113/6 113/24 114/17 115/3 118/8 119/10 122/15 123/23 124/11 126/2 132/8 133/6	Horizon's [1] 56/12 hospital [5] 10/10 12/1 12/3 14/5 14/7 hostile [5] 77/22 77/24 78/3 78/13 78/15 hound [1] 12/15 hour [1] 16/9 house [3] 3/17 161/11 177/13 housed [1] 8/9 how [36] 9/9 18/6 18/21 27/4 35/20 35/24 36/5 42/6 43/15 43/17 43/19 47/9 50/9 57/22 61/22 66/8 66/12 66/25 69/7 77/14 78/10 81/10 81/20 89/1 90/23 122/19 139/15 141/4 141/4 154/3 154/5 158/5 163/16 163/18 163/18 181/13 Howe [4] 55/25 58/8 150/25 161/16 However [5] 11/21 93/15 97/23 131/12 142/11 HR [1] 75/25 huge [1] 62/15 Human [1] 160/18 hurry [1] 40/24 husband [2] 6/11 25/12 hushed [4] 31/17 31/25 35/10 35/11 hypothesis [3] 91/1 91/4 96/8	I I absolutely [1] 40/14 I agree [3] 166/10 166/15 169/2 I agreed [1] 138/20 I always [1] 107/10 I am [9] 5/22 11/13 12/3 12/10 13/1 18/5 18/11 72/6 72/21 I appear [1] 140/17 I appreciate [2] 2/15 118/4 I ask [4] 1/10 78/18 105/3 145/11 I asked [5] 23/17 62/20 111/6 127/15		

I	96/15 96/22 112/4 116/11 116/14 118/16 118/21 121/17 132/19 136/9 138/12 138/13 139/5 139/8 140/7 142/25 145/3 147/12 149/17 157/1 159/4 159/11 161/10 172/19 172/22 181/20	I would [29] 12/5 19/18 21/18 44/16 48/18 65/24 72/20 75/14 78/20 80/23 81/2 81/7 81/11 81/13 81/19 103/9 109/3 109/6 112/18 129/15 129/23 133/10 142/5 143/8 152/15 159/2 161/24 164/17 170/6	104/17 112/11 112/22 115/13 116/14 126/4 126/20 134/10 150/23 150/23 154/11 155/3 156/7 164/15 164/15 164/16 165/24 176/8 Ian [7] 50/13 52/12 53/21 63/17 83/7 83/7 83/22	124/9 124/15 125/16 126/12 127/7 127/15 128/6 129/20 131/6 132/5 133/4 133/16 133/19 134/1 135/14 135/17 135/25 136/9 136/18 136/18 143/20 145/4 145/19 145/20 146/7 146/11 146/14 147/5 149/24 152/6 152/15 153/1 154/19 160/22 161/18 162/2 162/4 164/11 165/7 168/12 169/3 169/9 169/19 170/19 172/5 172/18 177/22 177/25 180/2
I request [1] 19/11 I requested [1] 44/22 I respected [2] 34/9 34/21 I reviewed [2] 125/6 126/4 I said [21] 21/16 47/19 48/4 59/5 66/15 67/2 79/3 95/1 95/11 116/20 116/25 127/19 130/7 133/8 135/21 139/24 142/8 148/7 151/18 165/13 181/5 I saw [4] 15/1 46/21 129/3 130/11 I say [6] 17/1 44/14 48/7 67/7 126/22 172/17 I see [6] 60/22 102/9 104/14 109/25 116/4 163/12 I seem [1] 46/8 I set [3] 81/15 175/11 176/18 I shared [1] 49/4 I should [7] 9/15 36/7 39/18 41/5 72/10 81/20 97/23 I started [5] 48/16 62/5 172/14 173/23 173/24 I state [1] 161/24 I stepped [3] 172/1 173/13 173/21 I still [1] 90/19 I strongly [1] 92/8 I suggest [7] 105/9 106/3 109/7 110/7 112/6 117/4 117/24 I suppose [1] 117/11 I suspect [1] 83/6 I then [2] 106/24 171/24 I think [93] 4/10 4/13 5/12 5/17 6/2 6/7 7/15 9/6 9/8 9/11 9/15 10/2 10/3 10/5 14/14 14/15 15/5 16/15 16/18 20/10 21/21 24/22 36/16 39/3 41/2 46/19 50/1 52/20 57/7 58/13 60/9 62/8 62/12 64/6 66/15 67/11 68/9 69/10 70/2 70/3 70/3 70/14 71/15 73/8 73/12 74/13 75/2 75/10 75/13 79/25 80/12 81/16 83/11 83/19 83/22 85/15 85/16 88/6 88/9 89/21 90/10 90/20 90/20 90/21 92/7 95/7 95/11	I thought [2] 40/11 132/21 I took [8] 42/22 45/2 47/9 125/8 171/4 171/23 172/13 176/20 I traditional [1] 128/16 I tried [3] 20/25 33/18 33/18 I trusted [2] 99/17 99/19 I turn [2] 28/5 60/3 I understand [6] 19/1 38/5 114/2 133/18 141/1 147/8 I understood [3] 126/20 139/9 139/10 I used [1] 91/15 I want [3] 1/14 132/9 145/15 I wanted [11] 17/6 22/2 39/4 39/23 40/24 61/15 61/23 106/22 112/3 173/25 176/10 I was [50] 15/2 15/23 16/23 16/25 17/7 22/2 22/2 22/7 22/16 22/23 26/14 33/14 39/11 40/19 42/4 48/23 58/11 76/15 85/21 105/17 112/3 112/13 118/5 121/17 124/12 127/17 128/25 129/14 129/17 130/4 131/12 132/15 134/9 138/20 138/23 139/9 139/21 148/6 161/14 170/6 170/11 170/17 170/24 172/7 172/15 178/3 178/17 179/3 181/4 181/7 I wasn't [17] 4/19 9/9 29/24 32/24 40/22 42/6 48/17 65/6 65/12 67/7 69/20 78/24 85/21 103/18 117/21 134/16 142/22 I went [3] 32/1 34/11 40/4 I will [5] 13/2 50/20 98/6 98/17 101/9 I wish [2] 134/16 164/16 I won't [1] 126/8 I worked [1] 91/17	I wouldn't [5] 48/5 49/8 71/4 71/4 142/3 I write [1] 5/21 I'd [34] 21/14 21/16 29/23 30/2 30/7 30/9 32/4 32/4 32/6 32/12 41/1 44/6 44/14 48/1 53/15 61/20 70/20 81/12 84/24 94/8 103/8 106/14 106/23 109/3 110/2 110/24 115/7 118/25 119/5 127/7 128/6 138/22 158/7 171/10 I'll [14] 7/2 17/22 37/2 64/17 86/1 87/1 94/17 113/22 117/5 128/19 135/23 156/20 161/22 171/10 I'm [81] 1/15 4/19 14/24 15/5 16/5 17/1 17/18 28/9 36/3 36/4 36/11 36/14 38/16 38/16 41/12 43/15 43/20 44/11 44/25 45/1 45/2 59/13 68/5 75/10 75/21 75/21 79/10 81/3 82/12 83/16 86/25 90/19 91/1 91/2 91/2 91/3 91/6 91/14 93/11 93/12 95/23 98/20 99/21 102/6 102/22 102/25 103/7 103/16 105/5 105/6 106/16 106/17 107/3 107/14 109/24 113/2 113/22 114/22 117/23 124/5 127/7 133/24 136/18 142/23 147/14 152/1 153/21 155/11 156/16 161/17 165/19 170/21 171/11 171/25 171/25 172/12 173/20 176/5 176/15 176/15 181/13 I've [44] 4/7 14/20 43/20 43/21 43/23 44/18 44/21 46/18 52/17 57/23 59/12 62/10 77/18 85/24 88/25 90/18 90/25 93/17 93/17 93/18 97/12 98/9 101/3 102/6 102/20 103/16	ID [10] 43/2 43/4 44/8 51/1 51/5 51/20 52/3 134/20 138/5 140/9 idea [9] 21/25 31/23 39/6 62/2 66/7 117/25 118/3 165/4 165/5 identification [1] 6/21 identified [5] 43/5 114/16 123/21 123/23 124/19 identify [2] 87/25 165/9 ie [9] 9/25 26/24 28/18 42/11 53/11 60/19 71/8 85/3 88/23 ie copying [1] 53/11 ie global [1] 85/3 ie it's [1] 60/19 ie its [1] 71/8 ie leaving [1] 9/25 ie liaison [1] 42/11 ie that's [1] 26/24 if [150] 2/20 4/15 5/16 5/20 7/4 7/14 7/22 8/2 8/22 12/21 13/13 16/3 20/3 21/5 21/17 21/18 25/1 27/22 28/21 29/4 29/13 29/16 30/4 34/25 37/20 38/23 39/19 40/6 40/12 41/6 41/17 41/24 42/7 43/22 44/14 46/24 48/8 51/23 52/9 52/10 52/18 55/23 57/2 61/16 61/18 61/23 62/11 63/1 63/20 64/21 66/25 69/19 69/19 69/22 70/8 71/22 72/1 72/14 72/16 72/20 80/16 81/12 81/22 82/24 83/1 83/25 84/13 84/24 86/12 86/23 87/15 88/21 89/8 90/14 91/6 91/19 93/22 94/9 95/8 97/13 97/16 98/2 98/14 98/15 99/1 100/20 102/23 103/8 103/18 103/24 106/7 114/6 114/22 119/1 119/19 121/17 122/2 122/11 123/15 123/17 123/25	124/9 124/15 125/16 126/12 127/7 127/15 128/6 129/20 131/6 132/5 133/4 133/16 133/19 134/1 135/14 135/17 135/25 136/9 136/18 136/18 143/20 145/4 145/19 145/20 146/7 146/11 146/14 147/5 149/24 152/6 152/15 153/1 154/19 160/22 161/18 162/2 162/4 164/11 165/7 168/12 169/3 169/9 169/19 170/19 172/5 172/18 177/22 177/25 180/2 ignorance [2] 112/24 116/6 ignore [1] 34/3 ill [2] 12/1 18/17 image [2] 14/12 15/17 imagine [3] 18/11 174/6 174/7 immediate [4] 13/21 13/25 15/6 15/8 immediately [2] 27/15 98/5 impact [2] 113/15 160/18 impacts [1] 119/23 implemented [2] 148/8 148/12 implications [2] 56/10 112/3 importance [2] 103/20 103/23 important [10] 15/17 15/24 24/13 29/21 39/7 42/8 126/14 136/10 140/8 141/13 importantly [2] 97/20 120/1 imposed [1] 109/8 impression [3] 30/11 72/21 178/23 imprisonment [1] 113/13 improve [1] 176/8 improvement [3] 44/5 148/10 176/5 improvements [2] 175/12 176/21 inaccurate [3] 44/12 48/14 49/3 inadequate [1] 19/15 inappropriate [1] 88/3 incentive [4] 29/12 29/20 30/15 35/9 incident [1] 12/6 incidents [1] 122/7 include [1] 127/1

I	94/17 95/1 95/9 95/12 101/16 105/22 106/15 106/23 106/25 107/11 108/25 110/3 110/5 110/5 111/4 112/13 115/20 115/21 120/3 121/4 121/9 125/6 126/21 126/24 127/8 127/14 127/21 127/23 127/25 128/8 128/12 129/3 129/9 129/24 129/25 130/8 133/23 136/12 136/20 136/23 136/24 137/2 138/14 146/20 147/23 150/6 150/8 167/6 167/8 167/12	77/3 150/13 intention [10] 21/7 22/8 23/1 23/3 28/21 29/7 62/25 63/8 63/12 144/3 intentionally [2] 143/8 143/9 intentions [1] 71/7 interaction [1] 53/14 interest [4] 20/18 41/12 80/12 133/24 interested [1] 53/10 Interesting [1] 105/7 interests [5] 28/9 38/12 80/4 80/6 80/7 interim [8] 63/18 67/16 67/20 71/13 71/15 81/17 175/11 176/5 interject [1] 172/18 internal [1] 107/12 interpretation [1] 89/22 interrupting [1] 130/2 interview [10] 61/15 105/8 105/9 105/14 109/11 122/18 139/11 156/1 156/13 156/15 interviewed [1] 155/20 interviewing [2] 140/23 141/8 interviews [1] 132/11 intimated [1] 11/18 intimately [2] 90/18 91/15 intimating [1] 95/18 intimidated [1] 161/8 intimidating [1] 160/20 into [63] 2/25 3/24 4/23 6/3 9/2 23/7 24/1 25/14 26/18 27/3 27/11 27/20 30/13 32/2 33/4 35/13 41/2 46/20 48/1 53/23 62/5 65/5 66/24 70/15 71/14 72/20 73/15 73/25 74/25 80/8 81/13 84/11 85/21 86/20 91/25 94/6 94/19 95/9 96/18 104/11 106/25 107/1 112/4 121/11 126/23 127/4 128/16 129/11 142/10 147/10 150/3 155/16 163/1 163/1 163/22 173/13 173/21 174/1 177/16 179/19 180/17 180/24 181/14 introduce [1] 123/16 investigate [12] 49/22 63/3 88/1 94/11	95/2 95/4 114/6 117/3 117/13 152/15 166/16 174/21 investigated [5] 54/19 61/11 88/17 89/3 114/13 investigating [5] 33/7 53/13 71/14 142/25 176/17 investigation [42] 3/24 6/14 8/2 24/1 30/13 32/10 33/20 51/15 54/19 54/24 55/4 59/8 60/16 60/17 60/23 61/9 62/24 72/9 93/19 94/7 94/12 94/18 94/19 94/25 95/10 106/25 121/10 121/23 122/12 123/13 123/15 126/23 127/1 127/10 127/15 127/20 128/4 156/16 158/11 163/1 164/21 166/8 investigations [14] 27/3 27/20 66/4 74/17 74/19 74/22 76/22 80/8 96/11 114/15 119/7 127/19 129/2 174/1 Investigator [2] 156/1 158/12 Investigator's [2] 129/10 129/21 Investigators [2] 60/15 61/5 involved [28] 15/3 16/21 22/22 29/24 32/24 37/16 48/16 59/16 59/20 59/24 61/10 62/6 64/22 71/5 73/8 79/4 106/23 116/20 117/9 118/6 129/2 137/2 140/21 141/9 142/22 172/14 172/17 174/1 involvement [11] 1/17 1/18 15/2 15/25 61/14 61/14 64/21 67/2 71/11 133/6 142/14 involving [2] 34/1 86/2 iPad [2] 159/14 159/18 irrelevant [1] 52/10 irrespective [1] 154/14 is [346] is/should [2] 108/15 108/22 ism [1] 129/20 isn't [35] 30/18 43/9 52/4 56/22 80/23 80/23 81/8 100/22	103/3 105/7 114/23 115/6 116/8 125/6 131/11 131/22 133/1 133/2 135/7 138/4 144/19 144/23 149/11 151/9 151/10 151/12 151/17 151/24 159/1 160/6 161/8 162/16 162/20 169/12 170/2 issue [46] 4/12 30/14 36/17 37/24 38/1 41/14 42/12 43/9 44/13 45/19 48/14 48/22 48/24 49/22 51/14 52/6 57/16 57/25 57/25 58/5 58/8 58/13 58/16 58/18 59/15 86/5 88/14 89/12 93/15 96/23 98/14 101/20 107/6 117/5 119/6 119/23 130/15 134/2 138/4 145/16 145/16 146/10 162/1 162/2 177/3 178/1 issued [1] 122/23 issues [32] 37/20 41/15 45/16 45/18 56/12 56/25 59/12 60/20 61/11 63/1 69/9 73/17 73/19 74/23 75/3 80/8 80/10 88/16 104/7 108/2 118/7 132/9 133/6 134/3 134/5 134/7 135/18 138/8 142/15 143/25 166/8 178/19 it [599] it's [82] 1/13 1/16 3/5 5/20 7/24 7/25 8/1 15/8 15/13 16/20 17/15 17/19 17/24 22/19 26/7 37/24 39/8 45/8 45/21 48/2 48/13 53/24 60/11 60/19 60/20 75/6 75/13 78/20 82/15 82/16 91/4 91/18 92/15 97/1 97/2 100/6 100/25 102/12 104/5 104/6 107/24 107/24 111/23 114/23 115/22 116/1 116/4 116/4 116/22 118/21 123/16 132/23 133/2 133/19 135/24 136/3 136/6 140/14 145/20 148/11 148/17 149/10 149/17 151/2 151/6 151/17 151/24 152/1 153/16 153/24 157/1 157/10 157/15 162/11 162/16 162/19 169/13 169/14 170/13 173/21 180/20 180/24
----------	---	---	--	---

<p>I</p> <p>IT-specific [1] 109/6 its [18] 19/6 33/11 44/12 51/1 56/15 70/25 71/8 71/8 79/16 88/23 103/15 103/22 103/25 104/16 104/24 106/18 106/21 148/4 itself [6] 51/5 69/8 74/15 79/15 87/12 171/6</p>	<p>June [3] 7/12 119/2 119/8 just [112] 2/17 2/21 4/8 4/9 5/9 5/11 5/15 8/1 10/17 12/12 16/16 17/5 17/15 19/25 20/14 20/25 22/17 22/24 23/12 25/17 31/22 35/15 35/16 35/17 35/17 35/23 36/8 36/21 37/13 38/1 38/3 39/19 45/10 48/2 53/25 54/4 54/7 54/23 55/10 55/11 55/13 55/20 59/1 63/20 65/13 67/19 68/11 72/2 73/2 75/10 81/17 83/11 86/6 86/7 91/7 92/25 93/22 96/25 97/3 97/5 99/23 100/6 102/14 103/24 109/20 112/2 113/22 120/7 120/20 121/11 122/8 122/24 123/13 123/16 125/8 126/18 127/24 128/1 128/3 129/2 130/4 130/7 131/8 131/24 133/11 133/13 133/16 133/20 134/14 134/23 137/21 138/18 140/19 142/17 143/14 145/13 145/22 146/16 146/23 147/2 147/6 151/2 151/11 152/18 154/4 156/7 162/9 170/12 171/15 173/23 176/7 179/16</p>	<p>kept [2] 4/21 53/18 Kevin [3] 6/17 104/5 117/7 key [5] 93/15 110/23 121/12 126/20 128/16 keyed [1] 51/6 keystroke [5] 136/14 137/11 137/17 138/7 138/18 kid's [1] 164/9 kind [5] 14/25 18/24 54/7 71/17 137/7 King [2] 57/9 58/11 knew [17] 14/13 16/18 100/21 105/16 109/12 109/16 110/7 110/8 110/18 110/18 110/19 112/6 112/6 116/25 138/25 139/6 140/9 know [96] 4/10 4/14 4/16 4/21 7/15 10/4 10/5 12/10 14/17 15/1 15/15 15/23 15/24 17/6 17/15 18/6 20/3 22/3 22/5 22/19 28/20 29/16 34/24 37/8 37/10 38/5 39/2 41/24 42/20 43/10 43/21 48/5 51/7 51/10 51/17 55/17 56/3 57/5 59/8 64/17 65/7 66/14 66/25 68/2 69/18 70/14 72/14 73/22 88/19 89/5 90/5 90/17 90/17 90/18 92/19 97/17 100/9 102/23 105/10 106/22 109/4 111/10 113/24 124/5 125/2 125/6 127/7 128/7 132/5 132/8 133/10 134/16 136/23 137/1 137/15 137/25 138/2 140/5 143/11 148/6 148/7 148/11 149/10 151/3 151/21 154/13 154/14 155/10 155/12 155/13 155/16 160/18 162/11 163/5 164/18 168/1</p>	<p>149/22 150/3 150/5 150/6 150/13 150/16 150/22 155/4 155/5 155/6 167/6 167/13 known [1] 137/20 knows [1] 127/5</p>	<p>led [1] 61/6 Lee [8] 50/12 50/17 50/22 50/22 51/15 51/18 52/12 52/18 Lee's [2] 50/17 50/20 left [10] 8/24 16/15 17/1 38/14 74/8 74/9 92/12 100/2 102/18 102/23 legal [25] 7/1 7/9 11/6 12/18 12/23 19/5 19/22 46/9 59/9 60/1 62/18 96/11 97/18 112/14 137/1 153/6 153/6 153/10 153/16 153/22 154/3 159/15 161/16 167/12 181/12 legally [1] 27/12 legals [1] 153/20 legitimately [1] 53/13 length [1] 143/10 lens [1] 78/8 Lepton [37] 36/15 36/17 36/20 41/8 42/5 45/15 48/1 48/22 48/24 49/23 51/14 51/23 52/6 58/4 58/19 59/15 104/8 110/8 110/11 114/20 114/21 119/6 130/12 130/13 130/15 132/16 134/10 134/19 137/13 137/25 138/4 138/25 139/12 139/23 140/3 140/4 145/16 less [4] 65/10 74/23 84/25 178/23 let [6] 18/6 28/20 29/15 96/25 103/12 142/18 let's [29] 14/8 36/21 45/7 47/1 100/24 104/3 106/5 108/8 108/8 109/19 109/20 111/9 114/25 133/13 149/19 152/2 152/6 152/18 153/14 161/1 161/20 164/19 164/19 166/23 167/15 174/25 175/18 179/11 179/16 letter [13] 2/16 2/20 2/23 4/8 5/9 5/12 6/16 7/5 24/23 30/8 64/1 72/19 115/10 letters [3] 32/20 159/23 173/7 letting [2] 51/16 112/19 level [16] 64/6 70/4 73/17 74/17 75/15 75/25 107/16 118/4 136/7 168/14 168/15 170/4 176/16 178/4 179/7 180/2</p>
<p>J</p> <p>Jacqueline [1] 177/5 jail [1] 6/24 James [4] 116/11 120/13 128/10 128/19 January [8] 28/7 36/25 73/10 90/3 104/3 105/9 123/5 154/22 Jenkins [16] 40/7 40/25 41/8 41/19 41/20 45/12 47/14 110/9 130/19 131/7 131/9 133/17 142/16 145/12 146/4 147/23 Jenkins' [1] 147/5 Jennifer [1] 155/18 JFSA [10] 3/21 33/25 34/5 34/8 34/12 34/20 54/2 72/10 72/13 173/3 Jo [4] 11/1 119/4 120/12 121/7 Jo Hamilton [1] 119/4 Jo Swinson [1] 11/1 job [4] 48/3 75/22 79/7 79/13 John [8] 36/25 37/4 37/15 100/25 101/16 101/21 105/25 171/24 joined [1] 79/24 Jon [1] 158/11 Jonathan [1] 155/20 Josephine [2] 122/4 123/16 JS [2] 111/14 111/16 judge [4] 100/6 149/18 162/4 163/5 judgment [3] 125/23 178/19 178/19 Julie [3] 8/5 9/3 9/18 July [11] 2/9 2/14 3/5 4/8 5/10 6/16 7/5 71/15 72/12 83/3 113/8 July 2001 [1] 113/8 July/August [1] 72/12 jump [1] 145/5 juncture [1] 76/6</p>	<p>53/25 54/4 54/7 54/23 55/10 55/11 55/13 55/20 59/1 63/20 65/13 67/19 68/11 72/2 73/2 75/10 81/17 83/11 86/6 86/7 91/7 92/25 93/22 96/25 97/3 97/5 99/23 100/6 102/14 103/24 109/20 112/2 113/22 120/7 120/20 121/11 122/8 122/24 123/13 123/16 125/8 126/18 127/24 128/1 128/3 129/2 130/4 130/7 131/8 131/24 133/11 133/13 133/16 133/20 134/14 134/23 137/21 138/18 140/19 142/17 143/14 145/13 145/22 146/16 146/23 147/2 147/6 151/2 151/11 152/18 154/4 156/7 162/9 170/12 171/15 173/23 176/7 179/16 justice [16] 94/4 94/22 95/17 96/3 99/10 100/4 101/18 138/8 143/25 148/7 161/21 161/21 162/15 178/18 179/4 180/12 Justice Fraser [1] 148/7 Justice Fraser's [1] 100/4</p>	<p>K</p> <p>Kalia [2] 113/2 113/10 kangaroo [1] 11/18 keep [23] 3/18 30/17 35/10 35/11 59/10 84/22 86/9 86/23 86/23 93/22 93/23 93/24 93/25 94/2 99/18 109/15 131/6 131/7 131/7 144/7 144/21 149/15 149/19 keeping [2] 18/19 53/24 keeps [2] 31/25 86/7 Kent [1] 113/3</p>	<p>L</p> <p>language [7] 61/12 78/20 80/23 81/1 81/2 81/8 150/3 large [12] 18/24 63/7 64/15 66/22 67/5 68/19 69/5 76/7 76/8 149/3 152/20 164/1 last [12] 3/10 11/21 24/17 56/8 59/15 72/11 72/19 72/22 84/18 89/23 101/7 179/11 late [3] 1/13 33/6 123/25 latecomers [1] 49/18 later [24] 6/2 6/6 6/8 10/14 13/8 15/5 37/9 44/19 44/22 46/13 46/16 46/23 49/20 51/12 54/5 65/5 82/21 95/19 103/22 104/1 104/10 138/21 139/7 176/19 Lauren [8] 17/13 18/3 21/5 21/7 21/8 21/18 21/22 21/24 law [4] 11/13 21/20 32/8 97/14 lawyer [8] 13/19 14/8 15/12 53/8 53/9 97/16 98/12 98/15 lawyers [1] 98/2 lay [2] 89/21 166/24 layby [1] 10/6 layout [1] 147/15 layperson's [1] 111/1 lead [4] 40/18 40/21 60/14 85/23 leaders [2] 65/14 76/19 leading [5] 66/2 94/6 173/25 178/12 178/15 leap [1] 84/5 learned [3] 6/2 6/6 149/18 learnt [2] 6/7 6/9 least [7] 12/22 24/1 97/19 115/18 133/6 172/23 179/23 leave [6] 20/7 25/9 82/12 105/20 177/13 181/6 Leavers [1] 25/3 leaves [1] 136/14 leaving [5] 5/4 9/25 20/19 21/4 22/17</p>	<p>led [1] 61/6 Lee [8] 50/12 50/17 50/22 50/22 51/15 51/18 52/12 52/18 Lee's [2] 50/17 50/20 left [10] 8/24 16/15 17/1 38/14 74/8 74/9 92/12 100/2 102/18 102/23 legal [25] 7/1 7/9 11/6 12/18 12/23 19/5 19/22 46/9 59/9 60/1 62/18 96/11 97/18 112/14 137/1 153/6 153/6 153/10 153/16 153/22 154/3 159/15 161/16 167/12 181/12 legally [1] 27/12 legals [1] 153/20 legitimately [1] 53/13 length [1] 143/10 lens [1] 78/8 Lepton [37] 36/15 36/17 36/20 41/8 42/5 45/15 48/1 48/22 48/24 49/23 51/14 51/23 52/6 58/4 58/19 59/15 104/8 110/8 110/11 114/20 114/21 119/6 130/12 130/13 130/15 132/16 134/10 134/19 137/13 137/25 138/4 138/25 139/12 139/23 140/3 140/4 145/16 less [4] 65/10 74/23 84/25 178/23 let [6] 18/6 28/20 29/15 96/25 103/12 142/18 let's [29] 14/8 36/21 45/7 47/1 100/24 104/3 106/5 108/8 108/8 109/19 109/20 111/9 114/25 133/13 149/19 152/2 152/6 152/18 153/14 161/1 161/20 164/19 164/19 166/23 167/15 174/25 175/18 179/11 179/16 letter [13] 2/16 2/20 2/23 4/8 5/9 5/12 6/16 7/5 24/23 30/8 64/1 72/19 115/10 letters [3] 32/20 159/23 173/7 letting [2] 51/16 112/19 level [16] 64/6 70/4 73/17 74/17 75/15 75/25 107/16 118/4 136/7 168/14 168/15 170/4 176/16 178/4 179/7 180/2</p>

L	listen [1] 165/23 listened [1] 77/19 listening [2] 5/1 166/6 literally [1] 145/7 litigation [6] 46/10 46/14 46/20 100/2 179/8 180/16 little [12] 5/4 16/3 46/23 74/19 83/2 87/22 106/9 111/9 113/22 133/16 146/15 161/20 live [7] 23/4 28/22 29/5 32/15 32/18 131/13 131/20 lived [1] 160/10 Liverpool [1] 12/1 lives [3] 113/18 118/1 119/24 loan [1] 164/7 loans [1] 91/20 local [9] 3/22 21/11 21/14 92/9 152/9 168/14 169/9 169/13 177/13 locate [3] 45/24 46/8 50/20 lock [1] 10/2 lodged [1] 24/14 logged [1] 50/23 logical [1] 180/4 logo [2] 54/6 54/7 logs [18] 41/23 43/12 45/15 45/15 47/15 52/14 130/21 131/14 131/20 131/21 132/4 132/9 146/6 146/8 146/12 146/19 147/4 172/24 London [2] 21/19 161/10 long [4] 8/1 35/4 64/10 86/9 longer [7] 20/21 20/24 26/17 80/9 118/17 118/18 118/19 Longman [4] 155/21 156/1 156/14 158/11 look [44] 5/11 5/16 5/20 7/14 7/22 8/3 8/22 10/20 17/14 23/23 24/22 28/9 33/4 36/21 40/16 41/17 48/1 48/18 49/23 52/18 62/11 71/21 72/2 72/20 86/1 89/25 95/12 96/12 109/20 111/9 119/17 123/13 128/2 131/12 133/10 135/22 140/19 143/11 146/12 164/19 175/18 176/24 177/3 179/17 looked [13] 36/11	56/22 69/12 69/13 78/9 110/13 121/20 127/22 146/17 163/1 164/17 169/16 175/20 looking [19] 10/3 28/5 32/23 45/10 50/17 68/18 73/18 78/8 79/19 82/22 82/23 86/25 91/3 94/13 104/12 131/19 132/15 135/13 179/13 looks [2] 91/7 92/22 loop [2] 53/18 53/25 loose [1] 108/5 Lord [3] 143/17 144/23 161/21 Lord Arbuthnot [1] 144/23 Lord Justice Fraser [1] 161/21 loss [21] 20/7 20/10 20/14 21/3 23/2 35/6 84/11 84/19 88/23 92/1 114/18 122/10 124/1 125/20 157/13 157/15 157/18 157/18 157/19 157/21 157/24 losses [20] 2/12 23/5 23/6 28/19 32/16 33/5 33/12 69/4 83/13 114/3 122/7 123/4 154/8 154/18 158/1 160/8 165/15 166/20 174/24 177/10 lost [4] 18/9 37/24 38/8 39/6 lot [10] 20/2 26/17 65/10 86/13 86/24 90/8 127/9 151/9 173/9 173/11 lots [1] 32/5 loud [2] 17/18 149/15 louder [4] 17/22 158/22 175/1 175/1 Lower [1] 172/21 lucky [1] 158/10 lunch [3] 82/16 98/22 133/5 Lusher [13] 56/16 56/23 57/7 57/12 58/13 58/14 58/16 106/5 106/6 106/8 106/11 106/24 110/19 lying [2] 117/20 117/22 Lynn [10] 101/6 101/9 101/16 101/21 101/24 102/2 102/11 102/16 109/10 110/18	22/8 23/19 25/11 25/14 25/21 29/15 47/2 58/21 87/19 100/13 100/14 114/2 123/6 125/18 126/19 127/8 135/10 135/14 138/3 142/15 150/23 156/1 157/20 166/18 176/3 Magistrates' [1] 113/11 mail [3] 8/10 8/10 155/15 mailman [1] 9/25 main [6] 18/14 22/5 41/22 65/14 81/18 132/4 mainly [1] 6/11 maintain [2] 29/20 170/18 maintained [1] 138/7 maintaining [5] 29/12 70/13 92/9 106/17 170/9 make [29] 6/23 25/18 44/8 47/4 48/10 57/19 64/19 72/10 84/5 89/4 97/24 112/12 112/23 141/20 142/1 147/11 149/7 156/5 156/6 157/3 157/14 157/21 157/25 158/21 175/4 175/4 175/16 175/17 177/19 makes [1] 97/5 making [10] 27/3 28/24 32/10 39/13 51/16 52/4 158/25 167/17 175/12 182/1 man [4] 8/20 8/21 11/20 15/19 man's [1] 14/1 manage [1] 163/19 managed [3] 85/13 171/21 171/22 management [4] 1/9 46/3 85/1 167/21 manager [8] 2/24 39/4 50/2 50/3 50/4 61/6 73/2 73/3 managerial [2] 107/14 109/1 managers [4] 50/9 61/7 61/9 168/10 managing [5] 1/12 96/15 171/13 171/19 173/7 Mandy [1] 153/11 manifesting [1] 74/15 manipulated [1] 112/21 Mantle [1] 153/11 manual [1] 134/25	manually [1] 131/15 many [22] 4/3 6/10 6/10 13/2 37/4 37/12 50/9 51/9 91/17 118/1 130/14 142/14 142/14 144/4 158/2 158/5 166/4 166/18 168/3 169/22 178/13 182/2 March [3] 113/13 122/13 122/14 MARGARET [2] 1/3 183/2 margin [1] 98/25 Marine [1] 52/2 Mark [12] 13/8 13/15 14/9 15/25 109/21 109/22 110/1 110/2 110/3 110/21 111/7 111/13 Mark Underwood [1] 110/21 marked [1] 91/23 market [1] 91/23 Marshall [5] 104/2 104/3 104/4 105/23 110/19 Martin [15] 1/13 1/18 2/22 5/21 8/4 11/13 12/19 13/22 15/1 22/5 22/24 25/2 32/25 72/24 142/17 Martin's [7] 6/17 12/10 14/15 14/15 20/18 21/8 29/4 masked [1] 8/13 massive [2] 62/14 65/9 massively [1] 62/9 material [1] 105/21 Matt [1] 137/11 matter [9] 19/11 19/15 34/21 35/10 35/11 103/20 125/10 133/3 151/16 matters [5] 46/25 72/9 73/21 108/18 123/8 may [38] 3/11 6/21 7/25 7/25 8/4 11/16 12/8 12/14 12/14 28/15 41/12 41/15 43/12 43/13 44/11 45/25 47/3 49/2 51/7 53/14 83/9 83/24 94/23 97/10 106/7 115/12 115/16 119/1 122/19 132/25 133/24 134/2 146/19 155/18 157/14 157/19 157/24 180/6 maybe [3] 17/19 85/17 174/5 me [74] 15/1 16/17 17/5 17/23 21/18
----------	---	---	---	---

M	77/24 80/15 80/17 86/11 89/25 112/4 116/24 117/10 137/5 137/9 161/14 meet [3] 21/16 21/18 119/22 meeting [24] 4/1 4/10 4/11 4/21 11/22 12/24 30/6 30/7 63/15 63/22 64/3 66/13 71/17 71/17 71/20 76/3 78/11 101/12 104/13 119/9 119/18 120/19 120/25 135/24 meetings [2] 69/19 81/13 Melanie [1] 73/9 member [5] 6/22 51/1 55/25 60/5 123/11 members [1] 72/15 membership [2] 74/5 74/6 memoire [1] 123/9 memorably [1] 164/8 memories [1] 54/4 memory [5] 81/16 115/12 138/13 138/19 172/18 men [2] 8/14 9/2 mental [2] 113/15 174/8 mention [5] 105/21 108/14 108/22 110/25 139/12 mentioned [2] 108/13 124/23 merit [1] 180/6 merits [1] 180/2 message [10] 16/15 101/5 102/15 109/15 174/25 176/22 176/23 177/19 177/23 177/25 messaging [2] 5/7 104/19 met [13] 21/8 21/9 21/13 21/18 21/20 21/21 21/22 23/22 85/15 85/16 88/7 161/9 161/13 metal [1] 8/25 microphone [2] 121/16 121/18 mid [4] 80/17 81/4 81/9 81/23 mid-February [4] 80/17 81/4 81/9 81/23 middle [1] 161/3 might [23] 16/15 17/25 37/13 51/18 54/14 68/12 88/1 98/4 127/16 127/23 127/24 128/8 133/14 143/2 151/19 153/10 162/9	162/11 168/25 172/3 174/7 176/25 177/21 Mike [1] 101/11 million [3] 64/7 64/9 68/9 mind [7] 54/13 64/11 67/1 91/14 93/13 116/13 177/22 mine [2] 59/7 108/7 minimal [2] 76/9 77/7 minimising [1] 107/15 Minister [1] 72/18 ministers [1] 144/12 minute [4] 63/19 82/13 90/19 140/13 minutes [6] 13/8 98/21 116/15 116/16 116/17 118/22 miscarriage [3] 94/4 94/22 95/16 miscarriages [3] 96/3 99/10 101/18 misinterpretation [1] 167/1 misled [1] 94/23 missed [3] 103/16 143/10 164/16 missing [3] 108/14 108/22 124/19 mistake [1] 58/7 mistaken [2] 138/22 161/18 mistress [5] 150/20 152/6 152/8 169/7 169/11 mistresses [9] 149/4 149/6 149/9 152/20 163/25 164/6 174/9 176/23 177/9 mistresses' [1] 180/23 mitigation [1] 123/1 Mm [4] 9/13 89/15 120/24 153/13 Mm-hm [4] 9/13 89/15 120/24 153/13 Moloney [6] 118/21 118/24 130/2 140/12 145/14 183/8 moment [7] 7/2 46/12 47/2 91/1 134/1 146/25 179/14 Monday [1] 110/24 money [43] 6/3 9/14 30/17 31/16 31/24 35/9 38/13 65/10 68/19 84/10 87/4 87/10 89/8 89/14 89/19 93/16 93/21 108/14 108/22 113/10 114/19 119/24 124/19 125/19 125/25 141/23 142/10 151/3 152/17	152/21 158/19 160/22 164/2 164/6 164/9 169/23 169/25 180/22 180/23 181/1 181/2 181/4 181/7 money/IT [2] 108/14 108/22 Moneychanger [3] 91/19 92/4 92/6 monies [2] 142/23 143/1 month [11] 21/21 72/5 79/24 83/12 83/25 84/17 85/8 103/22 104/1 157/24 177/11 monthly [1] 84/8 months [8] 3/10 6/10 7/5 27/18 27/22 67/24 74/3 177/12 months' [6] 20/11 20/20 25/4 33/2 62/12 113/12 more [42] 3/11 3/18 5/24 14/19 21/13 30/17 37/2 42/25 52/15 53/14 64/12 64/19 66/9 73/16 73/18 74/16 74/22 74/24 79/19 79/21 82/9 83/2 84/25 88/8 91/9 92/12 93/7 97/20 99/14 99/14 114/15 116/14 131/8 152/22 153/14 161/20 164/8 168/15 175/2 175/2 175/21 181/7 morning [12] 1/5 1/6 1/6 1/10 4/7 5/13 5/14 11/24 36/15 49/11 65/7 130/13 moronic [1] 93/12 most [2] 65/17 65/21 mother [6] 5/10 21/9 21/20 32/8 32/21 113/7 motivated [1] 61/18 move [11] 27/4 36/14 41/4 49/20 55/22 72/1 75/4 82/21 86/1 106/5 114/23 moving [1] 5/9 MP [6] 3/22 124/24 126/14 127/5 128/10 161/11 MPs [7] 46/4 119/2 119/8 119/15 128/17 144/12 173/6 MR [145] 1/4 1/5 1/22 2/5 2/11 2/14 2/20 3/1 3/5 3/5 3/21 5/10 5/20 6/3 7/16 8/8 8/10 8/16 8/23 9/1 9/6 10/6 10/15 10/19 10/22	10/23 11/1 12/9 13/10 13/17 16/9 17/3 17/10 17/15 18/2 20/16 24/23 28/14 28/24 29/18 31/2 31/17 32/15 33/6 36/23 39/13 47/14 49/1 49/18 50/12 50/13 50/14 51/13 51/22 52/7 52/11 52/16 52/24 53/18 55/24 56/2 58/22 63/19 72/4 73/10 73/20 74/12 83/4 86/8 86/10 87/1 88/16 90/11 90/15 90/17 90/25 94/3 96/6 97/1 97/2 98/21 99/4 102/10 105/8 105/13 107/4 113/2 113/10 115/14 116/16 118/9 118/10 118/12 118/16 118/21 118/24 120/8 123/10 123/14 123/20 123/22 124/10 124/24 127/3 128/10 128/20 128/22 129/6 129/20 130/2 130/12 130/18 130/19 131/9 133/5 133/17 135/24 137/4 138/8 140/12 140/13 143/25 144/22 145/13 145/14 147/5 147/23 148/19 148/25 152/3 156/1 156/14 161/21 161/25 162/15 172/19 178/7 178/18 179/4 180/12 181/21 183/4 183/6 183/8 183/14 Mr Alan [2] 3/21 10/23 Mr Arbuthnot [4] 11/1 123/10 124/24 129/6 Mr Aujard's [2] 63/19 74/12 Mr Baker [1] 105/13 Mr Bardo [1] 137/4 Mr Bates [5] 12/9 72/4 73/10 73/20 178/7 Mr Beal [1] 161/25 Mr Beer [17] 1/5 17/15 49/18 107/4 115/14 118/12 118/16 120/8 130/12 130/18 135/24 140/13 144/22 145/13 152/3 172/19 181/21 Mr Brander [4] 123/14 124/10 127/3 128/20 Mr Breeden [1] 102/10 Mr Castleton [2]
----------	---	---	--	--

M	Mrs [75] 5/17 22/25 28/15 29/10 29/12 29/13 29/19 30/1 30/3 30/8 34/1 103/3 111/21 113/23 122/21 124/21 124/24 127/2 127/10 132/13 133/7 133/9 134/7 134/14 138/25 140/2 140/11 149/2 151/10 151/23 151/25 152/14 154/15 155/7 155/21 156/9 156/14 156/21 157/3 157/17 158/8 158/16 158/22 160/2 160/10 161/1 161/4 161/8 161/9 161/9 161/13 161/25 162/8 162/8 162/9 163/10 164/10 165/16 165/20 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 175/23 176/13 177/10 180/13 180/20 181/3 181/15 182/1	113/23 Ms [43] 1/6 4/24 13/5 16/21 16/21 17/23 23/17 41/11 48/3 49/20 50/15 52/11 57/3 67/25 70/7 72/4 80/25 82/22 89/24 95/25 96/5 96/20 97/1 97/10 118/25 121/2 121/4 122/8 122/13 140/14 140/15 140/17 143/2 143/13 144/4 144/19 145/3 145/4 145/8 145/11 178/6 183/10 183/12 Ms Crichton [2] 13/5 16/21 Ms Crowe [1] 57/3 Ms Hailstones [2] 50/15 52/11 Ms Hamilton [2] 122/8 122/13 Ms Oliver [4] 145/3 145/4 145/8 183/12 Ms Page [1] 97/1 Ms Perkins [2] 121/2 121/4 Ms Rose [1] 41/11 Ms van [16] 1/6 17/23 23/17 48/3 49/20 80/25 82/22 96/20 97/10 118/25 140/17 143/2 143/13 144/4 144/19 178/6 Ms Vennells [8] 4/24 16/21 67/25 70/7 72/4 89/24 95/25 96/5 Ms Watt [1] 140/14 much [20] 9/9 15/5 21/15 32/12 37/9 64/12 64/12 73/16 96/20 121/17 123/14 123/20 140/11 143/24 148/13 155/23 164/11 166/23 179/13 181/14	18/14 18/15 18/16 19/2 24/20 24/20 29/7 29/7 31/6 31/19 32/3 32/4 34/8 34/16 35/2 36/14 40/23 41/22 44/17 44/24 44/24 45/22 45/23 46/8 47/8 47/8 47/25 48/4 50/8 50/23 51/3 53/15 54/10 58/7 60/3 61/10 61/10 61/13 61/14 63/8 63/9 64/21 64/25 66/17 66/21 66/23 67/1 67/2 71/3 71/11 71/11 78/4 78/17 80/7 81/8 81/18 87/18 87/20 88/18 88/25 89/1 89/1 89/21 91/1 91/4 91/13 91/16 93/13 95/4 95/8 99/12 100/16 101/5 101/19 102/12 102/14 103/4 103/16 104/20 105/5 105/18 107/10 108/20 111/6 111/21 112/11 112/13 114/6 114/7 115/7 115/18 117/25 118/6 121/17 129/12 129/16 131/12 132/4 142/3 142/8 142/9 144/3 146/25 148/13 149/2 152/25 154/4 154/17 164/15 170/8 170/17 171/25 172/1 172/13 172/18 173/20 178/11 180/15 181/5 181/25 myself [5] 3/19 6/11 65/22 82/6 161/11	15/11 16/12 16/16 16/23 17/2 34/5 37/17 40/14 41/15 48/12 57/17 62/11 66/24 84/21 95/3 105/10 111/1 120/6 120/20 122/3 127/1 134/3 135/17 147/20 150/8 160/5 177/1 needed [5] 33/21 82/1 144/7 149/25 154/20 needs [3] 7/9 157/9 157/11 negligence [3] 129/22 153/24 154/9 negligent [1] 103/6 negotiated [1] 34/13 neither [4] 50/22 64/14 69/23 95/7 net [1] 96/18 network [28] 14/22 19/24 19/25 20/5 20/13 20/19 20/19 21/1 21/4 22/12 22/15 22/20 23/10 23/14 23/21 24/5 25/2 33/16 36/9 61/22 141/4 168/18 168/18 168/18 170/6 170/9 170/18 172/7 never [27] 12/17 21/6 23/1 23/1 23/2 24/20 29/8 35/11 51/11 53/24 59/6 62/14 62/14 62/25 68/22 71/3 77/2 77/2 85/24 107/9 109/4 112/18 118/6 143/8 148/5 150/24 161/9 nevertheless [1] 152/13 new [7] 20/8 27/15 54/22 57/8 72/15 113/25 121/10 news [4] 3/23 12/4 39/7 117/16 next [21] 4/2 27/21 28/5 37/23 51/20 52/3 65/21 76/2 77/21 79/14 80/14 95/20 101/7 103/10 105/7 113/2 114/25 115/22 117/8 124/1 137/4 NFSP [2] 105/13 144/13 nice [2] 149/15 166/22 Nick [1] 144/16 night [1] 160/15 no [115] 5/7 5/7 6/12 8/5 13/24 14/8 14/24 16/23 18/12 19/7 20/21 24/16 24/20
Mr Castleton... [2] 51/22 53/18 Mr Castleton's [1] 52/7 Mr Chester [5] 3/1 3/5 5/20 16/9 17/3 Mr Darlington [1] 55/24 Mr Darlington's [1] 58/22 Mr Davies [1] 13/17 Mr Gilliland [2] 13/10 105/8 Mr Griffiths [19] 1/22 2/5 2/11 2/14 2/20 3/5 8/8 8/10 8/16 8/23 9/1 9/6 10/6 10/15 10/19 10/22 28/14 32/15 33/6 Mr Griffiths' [9] 5/10 6/3 7/16 17/10 18/2 20/16 24/23 28/24 31/17 Mr Henderson [1] 50/14 Mr Henry [8] 97/1 97/2 98/21 99/4 116/16 118/9 133/5 183/6 Mr James [1] 128/10 Mr Jenkins [5] 47/14 130/19 131/9 133/17 147/23 Mr Jenkins' [1] 147/5 Mr Justice [4] 138/8 143/25 161/21 180/12 Mr Justice Fraser [3] 162/15 178/18 179/4 Mr Kalia [1] 113/10 Mr Longman [2] 156/1 156/14 Mr Moloney [6] 118/21 118/24 130/2 140/12 145/14 183/8 Mr Page [1] 90/15 Mr Parmod [1] 113/2 Mr Parsons [2] 83/4 128/22 Mr Stein [1] 148/19 Mr Stuart [2] 123/20 123/22 Mr Warmington [17] 36/23 39/13 49/1 50/12 51/13 52/11 52/16 52/24 56/2 86/10 87/1 88/16 90/11 90/17 90/25 94/3 96/6 Mr Warmington's [2] 50/13 86/8 Mr Williams [2] 29/18 31/2	Mrs Falcon [1] 177/10 Mrs Griffiths [8] 5/17 22/25 28/15 29/10 29/12 29/19 30/8 34/1 Mrs Griffiths' [3] 29/13 30/1 30/3 Mrs Hamilton [2] 122/21 124/21 Mrs Hamilton's [1] 124/24 Mrs O'Dell [15] 155/21 156/9 156/14 156/21 157/3 157/17 158/8 158/16 160/10 161/9 161/9 161/13 162/8 162/9 165/20 Mrs O'Dell's [1] 175/23 Mrs van [8] 134/14 152/14 154/15 158/22 161/4 162/8 163/10 166/13 Mrs van den [2] 134/7 181/15 Mrs van den Bogerd [33] 103/3 111/21 127/2 127/10 132/13 133/7 133/9 138/25 140/2 140/11 149/2 151/10 151/23 151/25 155/7 160/2 161/1 161/8 161/25 164/10 165/16 165/23 166/23 174/3 174/10 174/16 175/8 175/19 176/13 180/13 180/20 181/3 182/1 Mrs Vennells [1]	multi-criticised [1] 143/24 multi [3] 91/18 92/3 92/4 multi-currency [2] 91/18 92/4 mum [3] 18/5 18/16 19/2 must [15] 13/8 30/21 31/12 98/5 102/4 102/13 125/18 126/12 149/13 163/1 169/21 173/18 175/15 175/17 176/11 mustn't [1] 102/16 my [133] 3/11 3/17 3/19 3/22 4/3 5/23 7/4 11/13 14/13 15/2 15/18 15/22 18/5	N nail [1] 36/21 naive [1] 47/7 name [5] 61/7 63/20 75/13 142/17 149/2 named [1] 153/10 names [1] 153/11 naming [1] 51/5 narrow [3] 73/16 83/22 88/8 National [1] 140/18 naturally [1] 81/5 nature [5] 52/25 64/13 64/19 66/9 69/22 NatWest [1] 113/4 NBSC [9] 154/25 155/8 167/7 167/9 175/14 175/16 175/20 176/1 176/20 necessarily [1] 99/24 necessary [2] 97/5 144/20 need [29] 13/6 13/20	

N	172/20 177/2	162/8 162/9 165/20	officially [1] 115/19	154/5
no... [102] 29/3 30/21	notification [1] 32/24	O'Dell's [1] 175/23	offset [1] 86/18	operating [4] 75/23
34/4 34/5 43/1 43/20	notifications [2] 3/13	O'Farrell [2] 107/20	often [1] 142/21	167/16 167/24 168/4
44/21 47/9 55/9 55/17	14/25	108/9	Oh [4] 75/20 111/21	operation [8] 69/15
56/5 59/19 59/23 60/1	notified [2] 10/18	oath [1] 100/7	114/22 181/13	71/8 80/17 81/5 81/22
62/23 65/20 68/25	34/14	objection [2] 98/7	okay [32] 4/19 5/9	88/4 176/12 180/13
70/11 75/18 75/19	notwithstanding [1]	98/8	10/5 38/5 46/23 58/7	operational [2]
76/9 76/25 77/2 77/7	148/3	objective [1] 170/7	59/3 59/14 73/6 78/20	132/10 140/22
77/12 78/24 84/21	novelty [1] 113/25	objectives [1] 27/6	91/5 94/2 98/19	operator [7] 27/10
88/20 90/7 90/21	November [9] 21/21	observation [1]	120/22 121/19 124/7	27/11 27/15 135/1
92/20 92/24 93/4	49/25 74/2 117/6	42/14	134/23 136/3 136/6	135/11 135/15 138/3
93/17 96/2 96/7 99/8	117/18 155/20 157/13	observed [2] 64/10	149/21 153/16 154/11	opinion [1] 69/11
99/17 99/19 100/23	157/17 157/23	159/16	155/1 156/24 157/1	opportunity [1] 24/9
101/19 102/6 104/17	now [97] 4/5 4/19	obvious [8] 43/2 44/8	158/10 158/13 162/22	opposed [1] 138/13
104/25 106/19 107/17	7/15 16/17 16/22	67/3 70/4 70/21 80/18	162/25 165/1 171/2	opposite [2] 170/11
108/5 108/18 109/18	17/16 17/20 18/1 18/8	140/6 175/2	176/22	170/13
110/12 111/23 112/18	23/22 36/6 41/21	obviously [6] 14/19	Oliver [4] 145/3	option [2] 27/16 32/9
112/22 113/1 115/1	43/17 43/19 48/18	45/21 48/18 68/8	145/4 145/8 183/12	or [133] 2/4 5/5 12/14
116/9 116/23 116/23	50/17 54/1 67/2 69/7	103/20 162/22	omit [1] 101/7	16/9 17/3 18/22 19/5
116/25 117/21 117/23	84/14 86/19 92/19	occasion [5] 144/12	on [327]	19/22 20/17 20/22
120/20 125/1 125/5	97/13 98/2 100/10	160/20 164/8 164/9	once [5] 19/17 68/15	24/7 24/11 26/2 27/17
125/8 126/7 126/9	100/11 100/17 100/20	169/23	85/17 160/12 175/1	28/14 28/17 28/19
127/2 128/3 128/25	101/16 102/4 103/5	occasionally [1]	oncoming [1] 10/8	29/6 33/23 38/3 39/25
134/5 134/16 140/5	103/13 104/14 105/3	165/24	one [58] 4/16 4/17	42/2 42/7 42/8 43/3
142/3 143/15 144/9	107/19 113/18 114/8	occasions [5] 97/12	8/14 8/14 8/20 15/21	43/12 44/4 45/14 46/2
144/18 144/25 150/23	117/5 118/9 120/8	110/4 142/14 161/10	37/4 37/13 37/22	46/3 47/2 47/6 48/17
152/10 152/10 152/24	121/2 121/25 124/3	162/13	41/14 45/16 45/18	49/5 51/7 51/10 52/15
153/19 156/11 161/9	125/22 130/12 131/9	occur [2] 99/9 99/15	48/2 49/17 50/10	53/9 56/19 58/4 58/18
163/3 163/4 163/4	131/24 132/3 132/12	51/10 56/22 57/8	51/10 56/22 57/8	58/21 59/16 59/20
163/8 163/22 164/4	133/10 134/17 135/17	58/11 58/15 58/16	61/7 65/14 76/19 82/9	59/24 63/7 65/14
165/11 165/12 168/14	143/11 143/12 148/15	61/7 65/14 76/19 82/9	86/18 87/5 92/17	66/22 67/23 69/14
169/8 169/9 170/3	148/16 150/18 151/12	86/18 87/5 92/17	101/10 104/21 106/20	71/6 71/7 71/17 73/4
174/15 177/4 177/5	152/18 153/3 153/6	101/10 104/21 106/20	116/14 118/17 118/17	76/16 77/3 77/15
177/22 181/19	153/25 154/21 155/3	116/14 118/17 118/17	118/18 118/19 118/19	78/14 79/16 82/9 84/4
Nobody [1] 108/24	155/18 155/21 155/25	118/18 118/19 118/19	118/20 120/12 129/11	86/21 87/5 87/12
non [6] 22/13 35/7	156/6 156/13 156/16	118/20 120/12 129/11	131/8 134/2 150/15	87/19 90/1 91/9 92/7
35/13 35/19 56/11	156/25 157/24 158/5	131/8 134/2 150/15	150/16 150/19 151/4	93/19 93/20 97/1 97/5
89/8	158/15 159/10 160/2	150/16 150/19 151/4	151/7 160/19 161/10	101/2 103/5 103/14
non-disclosure [2]	160/16 160/23 161/21	151/7 160/19 161/10	164/8 164/9 168/10	103/23 105/3 105/21
35/19 56/11	162/4 162/6 162/15	164/8 164/9 168/10	168/10 175/14 179/11	106/16 106/19 108/13
none [4] 96/9 124/23	163/16 164/18 166/2	168/10 175/14 179/11	179/14 181/6 181/10	114/5 114/15 115/4
126/2 143/3	168/3 168/9 169/3	179/14 181/6 181/10	ongoing [4] 6/14	115/4 115/18 115/20
nor [4] 50/22 64/14	170/21 171/9 171/15	151/11	59/21 156/22 163/23	119/6 121/25 124/13
69/24 95/7	173/9 173/14 176/22	offer [5] 20/15 25/6	59/21 156/22 163/23	128/4 132/23 135/10
Norbury [1] 171/23	177/17 179/14 180/7	25/18 25/21 62/22	only [27] 5/1 7/11	135/11 135/15 137/16
normal [4] 25/14	NSA [1] 157/15	25/18 25/21 62/22	34/12 37/8 47/25 51/9	138/2 138/3 139/1
25/17 26/1 26/10	nub [2] 131/11	offered [5] 20/12	54/18 62/22 65/24	142/10 144/5 144/10
North [3] 50/10 61/3	131/21	25/8 25/14 122/25	69/15 78/1 87/20 92/3	145/24 145/25 146/8
61/8	number [10] 59/9	165/14	96/21 124/18 124/19	147/4 147/12 148/12
Northumberland [1]	63/25 99/21 136/8	offering [3] 19/3	125/14 126/11 135/13	150/15 150/20 152/5
177/6	149/3 155/3 166/5	19/20 19/23	150/19 150/20 151/4	152/8 152/22 154/2
not [189]	166/20 174/22 178/20	office [223]	151/7 156/5 161/24	154/9 156/4 165/4
note [5] 25/11 29/10	number 6 [1] 178/20	Office's [26] 1/9 3/25	170/17 173/21	166/16 167/7 167/12
40/23 65/6 67/23	numbers [2] 151/5	11/9 22/18 26/4 27/19	onwards [4] 45/8	168/25 168/25 169/5
noted [2] 64/5 64/8	151/11	54/22 56/10 60/17	74/11 99/5 99/9	169/6 169/10 169/21
nothing [12] 5/7	numerous [4] 12/17	62/21 63/11 66/7	open [9] 8/7 8/17	169/23 170/9 174/4
29/23 39/14 55/19	49/6 102/6 178/21	69/22 70/23 71/7	8/20 9/25 18/19 29/1	175/4 179/20 180/10
71/1 93/19 110/15	O	74/12 84/1 84/3 84/11	66/20 119/14 120/2	181/8
111/3 144/11 144/22	O'Dell [16] 155/18	85/9 85/25 89/16	opened [2] 67/12	orchestrated [1]
163/7 163/7	155/21 156/9 156/14	112/25 164/21 164/24	74/1	160/6
notice [11] 2/8 20/20	156/21 157/3 157/17	169/13	openly [1] 68/24	order [12] 46/10
20/22 25/4 28/4 33/2	158/8 158/16 160/10	Officer [4] 75/24	operated [8] 35/15	48/13 63/23 64/9 72/8
34/25 62/12 101/17	161/9 161/9 161/13	109/8 167/16 167/25	35/25 57/22 61/22	102/17 121/3 121/22
		offices [3] 140/22	81/21 141/4 141/5	128/9 144/21 150/10
		160/4 168/7		

<p>O</p> <p>order... [1] 152/21</p> <p>organisation [4] 14/10 18/25 99/13 167/10</p> <p>organisations [1] 144/21</p> <p>orientate [1] 145/22</p> <p>originally [2] 14/17 41/9</p> <p>originator [1] 51/10</p> <p>Orpington [1] 113/3</p> <p>Orwellian [1] 116/5</p> <p>other [34] 1/11 8/20 10/25 18/24 42/7 45/19 47/10 49/9 54/16 60/25 65/25 77/19 78/2 82/16 130/10 137/1 138/10 145/9 150/15 150/19 156/6 159/22 159/24 161/12 162/12 167/10 167/18 168/11 170/8 170/17 174/16 177/10 178/7 179/6</p> <p>others [7] 4/4 46/3 65/2 83/3 106/13 108/20 163/19</p> <p>otherwise [3] 128/23 140/1 142/2</p> <p>ought [3] 79/1 91/8 101/18</p> <p>oughtn't [1] 99/24</p> <p>our [27] 4/9 18/7 18/9 18/11 18/14 18/21 19/8 19/9 19/10 28/21 40/17 49/11 61/22 82/13 86/16 95/10 95/13 96/11 97/14 107/11 119/25 132/10 148/14 149/10 164/25 174/8 180/3</p> <p>ourselves [1] 145/22</p> <p>out [57] 4/21 7/15 8/12 10/7 11/15 11/24 13/11 16/15 23/22 24/2 28/11 30/19 37/16 41/3 51/11 51/18 52/12 53/18 53/24 55/15 60/15 69/6 69/9 71/15 71/17 79/9 92/24 93/1 110/4 111/7 113/22 122/21 126/15 126/20 132/25 140/20 151/20 153/25 154/4 156/3 156/14 156/15 158/12 160/13 161/22 162/17 166/22 171/11 172/2 172/9 176/22 176/24 177/19 177/24 181/2 181/8 181/9</p> <p>outcome [5] 27/2</p>	<p>30/12 32/10 66/10 67/1</p> <p>outcomes [1] 33/20</p> <p>outdistance [1] 178/9</p> <p>outlets [1] 144/15</p> <p>outlook [1] 103/9</p> <p>output [1] 74/19</p> <p>outputs [2] 63/4 80/1</p> <p>outs [1] 136/23</p> <p>outset [1] 71/7</p> <p>outside [10] 4/17 4/25 8/11 44/17 47/8 48/4 69/20 75/3 89/6 162/5</p> <p>outspend [2] 178/9 179/2</p> <p>outstanding [6] 7/10 26/13 28/19 29/5 123/8 125/15</p> <p>over [39] 3/4 3/10 6/10 7/19 8/15 8/19 13/3 42/24 61/21 76/5 77/7 77/13 90/11 92/13 92/25 103/16 112/11 113/7 114/15 122/24 136/15 137/4 141/2 143/10 144/4 150/23 152/17 152/24 154/5 160/11 162/19 165/25 166/3 168/1 168/3 171/4 178/12 178/21 182/3</p> <p>overall [3] 64/3 139/14 139/18</p> <p>overheads [1] 7/7</p> <p>overnight [3] 124/4 124/8 126/10</p> <p>oversight [1] 167/17</p> <p>overview [1] 59/10</p> <p>overwhelming [1] 56/20</p> <p>own [8] 10/16 11/20 12/16 51/1 56/15 70/25 91/17 107/10</p> <p>owners [1] 167/7</p> <hr/> <p>P</p> <p>pack [4] 102/8 119/17 119/18 121/1</p> <p>packaged [1] 21/5</p> <p>pad [1] 157/9</p> <p>page [80] 2/21 5/16 8/3 10/20 13/4 13/14 36/22 38/23 38/24 39/19 40/6 40/9 41/5 41/6 41/6 41/18 43/8 45/8 49/24 52/10 53/6 53/7 55/23 55/24 57/3 60/11 63/20 63/21 72/2 72/3 73/1 76/2 76/5 82/23 82/24 82/24 84/22 86/5 86/6 86/7 87/15 87/15 90/3</p>	<p>90/9 90/12 90/14 90/15 92/23 97/1 107/19 110/20 111/10 117/4 119/19 122/1 122/3 122/6 122/11 122/24 123/17 124/1 124/9 124/15 124/16 131/4 131/10 135/25 136/1 136/6 137/4 145/21 146/11 154/24 156/17 156/25 157/1 170/23 171/9 172/3 179/12</p> <p>page 1 [9] 38/23 41/6 41/6 43/8 53/6 57/3 63/21 87/15 111/10</p> <p>page 13 [1] 122/1</p> <p>page 14 [1] 170/23</p> <p>page 2 [6] 36/22 41/5 52/10 55/23 82/24 179/12</p> <p>page 22 [1] 135/25</p> <p>page 3 [10] 13/14 49/24 82/23 82/24 110/20 117/4 119/19 146/11 156/17 157/1</p> <p>page 4 [3] 10/20 13/4 86/7</p> <p>page 45 [1] 45/8</p> <p>page 5 [3] 86/5 145/21 172/3</p> <p>page 6 [3] 107/19 154/24 171/9</p> <p>page 60 [1] 60/11</p> <p>page 7 [3] 90/14 124/15 124/16</p> <p>pages [2] 50/21 93/18</p> <p>paid [8] 38/14 38/18 38/22 113/10 125/15 125/16 138/1 138/6</p> <p>pain [1] 118/2</p> <p>painted [1] 129/6</p> <p>pair [1] 109/12</p> <p>Panorama [6] 109/20 114/13 135/25 139/2 139/9 139/12</p> <p>paper [4] 4/22 4/24 83/4 106/16</p> <p>papers [1] 10/4</p> <p>paperwork [1] 8/19</p> <p>paragraph [21] 29/10 43/9 45/8 60/9 87/17 101/7 114/25 115/22 117/8 124/17 140/20 146/23 154/24 157/2 170/21 170/23 171/9 178/18 179/12 179/14 179/17</p> <p>paragraph 114 [1] 60/9</p> <p>paragraph 2.1 [1] 29/10</p> <p>paragraph 30 [2]</p>	<p>170/21 170/23</p> <p>paragraph 4 [1] 179/12</p> <p>paragraph 4.3 [2] 179/14 179/17</p> <p>paragraph 58 [1] 178/18</p> <p>paragraph 9 [3] 140/20 154/24 171/9</p> <p>paragraph 94 [1] 45/8</p> <p>paragraphs [2] 1/16 84/21</p> <p>paragraphs 149 [1] 1/16</p> <p>parallel [5] 14/25 26/14 32/23 33/3 81/15</p> <p>paraphrase [1] 156/20</p> <p>parcel [1] 8/9</p> <p>parent [1] 5/21</p> <p>parents [2] 6/3 14/4</p> <p>Parliament [2] 95/20 123/11</p> <p>Parliamentary [1] 95/24</p> <p>Parmod [1] 113/2</p> <p>Parsons [6] 53/8 65/24 83/3 83/4 86/4 128/22</p> <p>part [43] 5/22 20/9 22/18 26/3 26/3 42/2 50/8 54/16 54/16 54/23 59/4 62/22 65/1 68/6 85/12 92/17 96/10 102/7 110/1 111/14 129/22 135/2 135/2 136/8 136/25 156/19 159/16 160/7 164/13 164/23 167/4 168/17 170/6 170/7 170/13 170/17 170/18 171/11 172/13 173/10 175/9 176/10 178/2</p> <p>partially [1] 179/23</p> <p>Participant [1] 97/5</p> <p>Participants [4] 96/23 150/25 151/1 181/24</p> <p>particular [15] 4/3 49/7 71/19 85/22 89/4 92/24 106/20 119/3 125/11 141/7 150/7 155/9 167/11 167/20 169/1</p> <p>parties [2] 19/12 92/21</p> <p>partner [2] 50/12 50/14</p> <p>party [5] 36/11 65/12 67/7 179/24 180/11</p> <p>pass [4] 34/22 49/1 94/17 95/14</p>	<p>passed [2] 10/14 60/24</p> <p>passing [3] 18/2 166/11 166/17</p> <p>past [8] 11/8 18/22 47/3 47/5 57/2 86/21 98/22 114/15</p> <p>pasted [1] 101/14</p> <p>Patrick [1] 138/20</p> <p>Paula [18] 10/24 63/16 63/22 63/24 64/5 64/10 65/2 68/9 75/15 75/15 95/20 107/21 108/11 108/13 108/18 109/8 109/13 113/19</p> <p>Paula's [2] 67/6 75/20</p> <p>pausing [1] 146/16</p> <p>pay [38] 9/14 27/7 38/6 63/6 77/8 93/2 93/4 126/13 151/2 151/6 151/16 152/6 152/13 152/20 153/4 153/17 154/13 158/19 159/24 160/5 161/6 164/6 164/24 164/24 164/25 165/7 166/1 166/6 167/3 168/25 169/4 169/6 169/20 169/21 169/25 175/7 176/2 181/8</p> <p>pay-up [2] 164/24 164/24</p> <p>paying [4] 76/10 78/25 155/24 181/9</p> <p>payment [41] 19/24 20/1 20/6 20/10 21/2 21/3 21/6 22/2 22/7 22/15 22/25 23/2 23/17 23/22 24/6 24/11 25/3 25/7 25/13 26/11 26/15 26/22 27/7 27/16 27/18 27/24 30/11 32/4 33/10 33/14 33/17 33/24 35/1 35/5 36/9 36/9 38/7 38/11 64/15 123/6 123/7</p> <p>payment' [1] 19/4</p> <p>payments [16] 22/12 29/11 29/15 29/19 30/15 35/9 62/3 62/10 62/22 64/19 66/9 66/9 66/22 69/16 122/9 163/18</p> <p>payout [1] 180/5</p> <p>penalty [1] 164/24</p> <p>Penny [5] 133/14 146/12 147/16 147/16 147/20</p> <p>penultimate [1] 124/16</p> <p>people [51] 10/25</p>
--	---	--	---	--

P	122/1 128/23 129/3 129/6 130/23 132/7 137/7 138/24 139/14 139/18 139/21 140/2 piece [4] 23/10 23/14 95/14 136/20 piggy [1] 164/9 PIN [1] 157/9 placate [1] 62/3 place [8] 34/8 35/2 35/3 63/16 68/13 159/5 161/13 178/2 plan [7] 20/9 62/20 64/19 66/13 69/14 116/19 116/24 plans [2] 3/16 71/7 play [1] 180/19 plea [5] 90/15 90/22 125/20 125/24 126/1 pleaded [2] 113/11 123/2 pleas [1] 122/25 please [112] 1/21 5/12 7/15 8/3 10/20 10/21 13/4 13/19 17/14 24/22 28/8 28/20 29/15 36/22 38/23 39/18 40/6 41/5 41/17 43/8 45/8 49/11 49/24 52/9 52/10 52/14 52/16 52/19 53/6 53/7 55/22 55/23 55/24 57/2 63/14 63/21 72/1 72/2 72/24 73/1 75/4 76/2 76/5 82/21 82/23 82/23 84/13 86/1 86/6 86/13 86/14 86/23 87/15 89/25 90/14 93/22 98/16 99/18 101/5 102/15 103/12 106/5 107/18 107/19 108/12 109/25 110/20 111/25 113/20 113/21 114/8 114/9 114/10 116/22 117/4 118/11 119/19 122/2 122/11 122/24 123/18 124/1 124/15 124/16 128/2 128/3 131/3 131/7 131/8 131/24 135/22 135/25 137/4 145/19 145/20 145/21 146/11 146/14 147/5 149/15 149/20 156/12 156/18 157/1 158/22 170/22 170/23 171/10 171/15 178/1 179/13 182/5 plus [1] 7/12 pm [12] 8/4 10/23 82/18 82/20 118/13 118/15 148/22 148/24 157/8 157/15 157/19 182/7	point [62] 8/24 9/1 9/2 12/15 13/24 14/2 16/18 16/25 20/23 26/18 27/17 29/1 29/3 32/5 32/15 37/18 39/10 39/13 46/21 52/4 53/20 54/1 54/8 55/13 55/21 57/10 65/3 65/8 67/6 68/1 68/3 77/21 78/10 78/13 79/8 79/14 92/18 94/11 95/8 96/7 96/9 98/6 110/24 116/1 116/4 116/5 126/23 127/20 129/15 132/21 137/13 137/22 139/8 142/23 145/13 154/19 167/25 168/1 168/5 169/17 174/21 177/22 pointed [1] 137/21 pointing [1] 51/18 points [4] 87/19 126/20 128/16 129/7 POIR [2] 60/16 94/12 POL [6] 60/14 123/4 159/15 161/3 179/9 180/14 POL Legal [1] 159/15 POL's [1] 155/1 POL00006380 [1] 179/11 POL00021762 [1] 82/22 POL00027684 [1] 116/17 POL00027722 [1] 119/18 POL00029709 [1] 55/22 POL00044389 [1] 123/14 POL00088956 [1] 101/1 POL00097480 [1] 145/20 POL00097481 [1] 131/2 POL00100336 [1] 63/14 POL00116957 [1] 107/18 POL00119518 [1] 114/8 POL00134139 [1] 41/4 POL00139181 [1] 109/19 POL00140211 [2] 135/22 135/23 POL00141489 [1] 36/22 POL00141757 [1] 113/21	POL00143567 [1] 156/13 POL00145768 [1] 2/19 POL00146928 [1] 49/24 POL00147157 [1] 5/12 POL00162068 [1] 10/19 POL00189165 [1] 156/17 POL00199572 [1] 72/1 POL00200717 [1] 75/4 POL00219796 [1] 28/6 POL00294728 [1] 104/4 POL00304439 [1] 106/6 POL00306172 [1] 24/22 POL00306234 [1] 17/14 POL00307313 [1] 86/1 POL00342530 [1] 7/23 police [3] 6/22 9/17 92/19 policy [5] 99/15 153/21 154/3 154/4 177/8 poor [2] 175/5 181/14 Portcullis [1] 161/11 Porter [1] 52/23 portrayed [1] 83/25 posed [2] 86/16 143/21 position [6] 7/6 51/3 70/25 74/12 74/15 179/19 positioning [2] 111/24 112/1 possibilities [1] 82/7 possibility [2] 50/24 87/3 possible [11] 52/1 84/25 89/19 93/13 111/17 111/20 115/16 115/20 135/14 144/12 179/25 possibly [3] 8/25 67/1 121/8 post [236] post-traumatic [1] 160/14 posted [1] 123/25 postman [5] 8/9 8/11 8/13 8/16 8/18 postmaster [19] 1/22	20/7 20/8 22/6 24/6 26/2 38/10 43/3 43/7 44/9 114/18 137/16 137/20 139/6 140/9 149/24 154/25 160/8 172/25 postmaster's [1] 56/19 postmasters [12] 20/12 89/20 141/20 142/2 142/5 142/9 153/17 153/22 166/15 167/14 176/14 176/23 postmasters' [1] 114/5 postponed [1] 3/17 postponement [1] 57/4 potential [3] 13/18 76/7 101/17 potentially [1] 88/13 pouch [1] 8/18 pouches [1] 10/1 pounds [1] 6/4 power [8] 76/9 76/11 76/14 76/25 77/3 77/7 77/16 180/1 PR [2] 15/15 15/23 pre [1] 122/20 pre-prepared [1] 122/20 precautionary [1] 122/17 predominantly [1] 59/7 preference [1] 27/2 pregnancy [1] 177/14 preparation [1] 46/13 prepare [1] 121/22 prepared [3] 24/23 122/20 145/4 preparing [1] 46/9 present [7] 4/22 7/7 48/14 72/21 129/3 130/10 159/10 presentation [1] 45/19 presented [7] 4/25 69/1 114/12 125/7 129/17 136/21 136/22 presenting [3] 4/24 44/11 49/2 press [1] 126/8 pressed [1] 113/22 pressing [1] 163/17 pressure [3] 5/23 22/4 64/1 presumably [2] 79/17 121/6 presume [4] 30/19 76/12 90/5 128/12 presumed [1] 30/25 pretty [5] 103/2
----------	--	--	--	---

<p>P</p> <p>pretty... [4] 162/16 162/20 163/5 173/19</p> <p>prevent [1] 55/15</p> <p>preventing [1] 55/2</p> <p>prevents [1] 95/24</p> <p>previous [1] 2/25</p> <p>previously [5] 21/8 113/4 136/5 159/8 170/11</p> <p>prime [1] 11/4</p> <p>principle [5] 97/18 97/21 164/24 164/24 180/6</p> <p>printed [1] 137/23</p> <p>printout [1] 91/11</p> <p>printouts [1] 124/11</p> <p>prior [10] 3/7 20/18 22/9 32/24 67/14 74/18 142/7 142/7 170/24 172/15</p> <p>prison [4] 99/7 99/16 111/17 177/11</p> <p>Priti [1] 56/8</p> <p>private [7] 21/13 21/14 34/21 66/13 69/19 69/22 157/12</p> <p>privately [1] 34/10</p> <p>privilege [3] 95/24 97/18 97/25</p> <p>probably [7] 4/15 40/16 75/21 153/11 158/7 158/8 164/8</p> <p>problem [15] 39/8 49/23 91/2 91/13 100/3 150/21 151/8 151/14 173/17 174/6 176/8 176/11 176/25 177/21 177/23</p> <p>problems [11] 6/18 39/25 111/19 114/1 157/10 166/11 166/12 166/16 166/19 173/5 176/1</p> <p>procedures [2] 9/12 9/23</p> <p>proceed [5] 27/4 27/15 33/11 96/22 125/14</p> <p>proceeded [2] 36/5 126/13</p> <p>proceeding [1] 30/11</p> <p>proceedings [6] 45/20 155/21 155/24 159/17 164/5 179/25</p> <p>process [38] 25/14 35/2 38/7 38/11 40/13 40/14 40/23 52/20 53/20 54/2 54/8 54/21 55/11 55/13 55/21 66/1 68/6 69/1 69/8 72/17 73/11 77/4 79/20 80/4 95/11</p>	<p>96/10 96/18 98/16 99/20 100/15 147/14 147/17 147/21 147/24 148/1 148/4 148/5 148/9</p> <p>processed [4] 38/19 51/8 87/10 91/25</p> <p>processes [2] 84/3 175/13</p> <p>processes/accountin g [1] 84/3</p> <p>processing [2] 21/1 38/7</p> <p>procured [1] 35/4</p> <p>produce [1] 85/17</p> <p>produced [7] 44/19 60/19 60/22 60/23 61/1 92/8 94/12</p> <p>product [2] 167/7 167/17</p> <p>production [1] 80/13</p> <p>professional [2] 52/22 92/22</p> <p>profit [8] 83/13 84/11 84/19 88/23 89/3 89/10 89/21 91/25</p> <p>profound [1] 113/15</p> <p>programme [17] 20/6 20/20 22/19 26/3 26/4 76/5 81/14 81/19 110/23 114/13 170/6 170/8 170/17 175/9 175/12 176/19 178/3</p> <p>programmes [3] 168/8 168/17 168/20</p> <p>progress [4] 42/12 63/23 80/20 117/1</p> <p>progressed [2] 24/18 122/19</p> <p>Project [3] 59/4 108/6 110/1</p> <p>projected [1] 64/5</p> <p>prompted [1] 61/14</p> <p>proof [3] 152/10 152/10 177/22</p> <p>proper [2] 60/4 77/16</p> <p>properly [3] 71/2 125/21 145/9</p> <p>proposal [1] 55/7</p> <p>propose [1] 98/22</p> <p>proposed [3] 4/22 72/15 180/16</p> <p>prosecute [2] 122/23 174/19</p> <p>prosecuted [4] 112/16 113/11 169/6 169/21</p> <p>prosecution [6] 90/12 112/10 121/23 125/9 126/6 136/19</p> <p>prosecutions [9] 47/7 59/22 112/12 118/5 118/6 142/18 142/20 142/21 142/22</p>	<p>prosecutorial [1] 99/15</p> <p>Prosecutors [1] 47/11</p> <p>prospect [1] 99/10</p> <p>protect [3] 109/17 143/25 174/18</p> <p>provide [11] 33/9 48/24 52/14 85/1 87/23 110/22 120/2 123/10 126/21 136/13 177/2</p> <p>provided [9] 9/19 42/15 44/1 115/7 126/21 128/8 129/20 129/24 136/24</p> <p>provides [1] 146/13</p> <p>providing [4] 5/25 82/8 101/11 175/20</p> <p>proving [1] 91/4</p> <p>provision [4] 29/18 122/20 169/16 172/24</p> <p>pub [2] 21/11 21/14</p> <p>public [9] 73/2 73/3 97/14 113/18 119/24 180/19 180/22 181/1 181/13</p> <p>publicise [1] 12/5</p> <p>publicising [1] 173/5</p> <p>publicity [2] 24/18 160/12</p> <p>pull [6] 8/20 127/18 128/25 129/18 167/7 180/1</p> <p>pulled [7] 121/12 126/25 127/14 127/21 130/7 136/11 137/6</p> <p>pulling [1] 40/3</p> <p>pulls [1] 136/8</p> <p>purely [1] 55/20</p> <p>purpose [1] 70/24</p> <p>purse [4] 180/19 180/22 181/1 181/13</p> <p>pursue [1] 33/22</p> <p>push [1] 41/3</p> <p>pushed [3] 8/15 53/17 160/3</p> <p>pushing [2] 95/11 106/16</p> <p>put [28] 2/15 8/10 19/9 21/25 24/7 25/23 44/4 46/17 47/9 70/25 97/4 97/15 97/24 98/3 98/6 99/1 101/17 102/14 109/14 113/20 128/16 130/8 144/22 150/3 172/20 177/14 178/2 180/24</p> <p>puts [1] 143/4</p> <p>putting [7] 6/3 8/6 19/1 79/20 88/12 117/10 132/25</p>	<p>Q</p> <p>QCs [1] 178/15</p> <p>qualified [1] 109/4</p> <p>queries [2] 86/4 150/7</p> <p>query [1] 110/6</p> <p>question [23] 28/22 58/21 59/15 62/20 80/25 81/3 83/9 83/24 86/17 86/19 93/10 97/15 97/17 97/24 98/6 98/8 99/6 111/7 114/22 117/25 139/5 145/15 167/11</p> <p>questioned [13] 1/4 96/13 99/4 118/24 140/15 145/8 148/25 183/4 183/6 183/8 183/10 183/12 183/14</p> <p>questioners [1] 118/17</p> <p>questioning [2] 146/25 181/21</p> <p>questions [17] 1/8 1/11 62/17 89/23 96/21 97/4 97/4 97/22 98/3 98/3 115/13 145/11 148/13 150/11 155/3 181/19 182/2</p> <p>quick [3] 6/23 109/20 145/15</p> <p>quickly [3] 7/22 17/5 80/9</p> <p>quiet [1] 30/17</p> <p>quite [17] 1/17 8/1 17/16 20/2 26/18 37/19 50/4 67/3 70/21 72/6 83/10 83/14 83/24 121/16 153/25 162/19 170/11</p> <p>quote [1] 161/22</p> <p>quoted [2] 57/6 151/11</p> <p>quoting [1] 68/10</p> <hr/> <p>R</p> <p>raid [1] 11/16</p> <p>raise [4] 12/11 42/9 48/6 132/18</p> <p>raised [12] 46/25 52/6 56/25 58/18 63/2 88/16 101/24 102/3 129/15 145/17 150/11 162/14</p> <p>raises [1] 45/17</p> <p>raising [6] 43/9 47/14 51/14 58/8 130/19 132/17</p> <p>range [2] 62/12 175/13</p> <p>ranks [1] 11/10</p> <p>rate [2] 91/24 179/7</p> <p>rather [13] 26/6 39/7</p>	<p>43/6 51/25 53/3 67/17 78/22 84/25 85/4 105/21 120/4 171/10 180/5</p> <p>raw [4] 131/14 131/19 131/20 135/13</p> <p>re [6] 8/13 79/16 94/11 95/2 169/16 170/19</p> <p>re-engineer [1] 79/16</p> <p>re-entered [1] 8/13</p> <p>re-establish [2] 169/16 170/19</p> <p>re-investigate [2] 94/11 95/2</p> <p>reach [2] 110/4 111/7</p> <p>reached [2] 16/15 41/3</p> <p>reaction [4] 13/21 13/25 15/7 15/8</p> <p>read [27] 8/1 11/2 42/2 43/15 43/15 43/17 43/19 43/21 43/21 44/14 84/21 87/1 90/10 102/4 102/20 103/10 103/14 103/18 103/23 103/24 113/22 127/11 127/12 127/15 134/17 161/22 171/10</p> <p>readily [1] 80/11</p> <p>reading [4] 93/22 101/2 102/7 103/1</p> <p>real [3] 64/4 120/16 173/17</p> <p>realise [4] 47/7 48/13 86/13 89/8</p> <p>realised [1] 86/8</p> <p>reality [2] 82/8 138/4</p> <p>really [13] 13/6 41/12 44/25 45/3 79/22 92/13 113/17 129/5 131/11 133/24 143/19 163/19 166/17</p> <p>reason [8] 16/11 17/20 41/22 44/12 92/10 104/17 132/3 142/3</p> <p>reasonable [2] 74/18 179/21</p> <p>reasons [5] 5/5 5/8 99/22 181/6 181/10</p> <p>reassured [1] 125/3</p> <p>Rebekah [1] 153/11</p> <p>recall [15] 1/9 33/25 34/2 43/19 45/22 46/4 71/19 71/22 86/17 127/22 129/14 148/9 159/12 159/22 159/25</p> <p>receipt [1] 38/13</p> <p>receipts [3] 137/23 137/23 139/8</p> <p>receive [1] 62/18</p> <p>received [17] 2/16</p>
---	--	---	---	---

R	refuses [2] 157/21 157/25	179/21	representatives [2] 65/18 181/24	76/20 114/18 144/5 144/10 152/11 154/8 154/24
received... [16] 6/24 11/3 11/11 18/7 18/23 19/17 87/4 101/6 101/11 102/16 102/21 104/16 105/23 107/25 128/8 146/6	refute [1] 7/1	remind [1] 97/20	represented [2] 98/11 150/25	rest [1] 59/8
receiving [2] 24/8 101/2	regard [3] 97/19 152/19 152/23	remitted [1] 87/5	represents [1] 6/20	rested [1] 164/2
recent [1] 3/22	regarding [6] 3/22 3/24 6/15 7/6 86/4 178/6	remote [16] 56/23 57/6 59/12 100/18 100/21 100/24 101/20 102/10 104/19 105/11 105/14 109/14 112/7 115/15 116/7 142/16	reputable [2] 141/20 142/4	restrict [2] 47/1 72/8
recently [3] 11/14 72/7 141/18	regardless [7] 12/13 93/5 142/19 153/4 175/7 176/2 180/6	remotely [2] 56/18 114/4	reputation [2] 14/11 119/25	result [9] 43/11 58/24 72/13 87/11 93/7 118/5 122/17 169/3 170/14
recipients [1] 46/7	regards [4] 7/10 157/4 158/13 161/22	remove [1] 54/5	request [24] 6/24 19/11 21/12 21/12 34/3 40/13 41/14 42/22 42/24 43/1 43/17 43/22 45/2 63/22 83/21 83/23 88/7 124/20 133/16 133/19 134/1 134/20 135/19 147/18	resulted [2] 42/14 114/17
recognised [2] 176/11 176/14	register [4] 102/11 102/19 103/22 134/13	remuneration [4] 20/11 62/13 93/2 93/6	requested [6] 44/22 45/22 83/7 122/18 146/8 146/9	results [2] 6/13 79/2
recognition [2] 25/5 125/18	registered [2] 20/18 103/8	reopen [1] 114/6	requesting [3] 6/19 122/9 179/15	retail [2] 5/24 7/8
recollection [5] 71/12 103/4 128/11 129/16 173/21	rein [1] 3/18	repaid [3] 6/11 7/12 123/4	requests [1] 59/10	retirement [1] 3/16
reconciled [2] 84/1 85/9	Reinvention [1] 168/18	repayment [1] 7/11	required [2] 9/14 117/13	retrial [1] 90/9
record [2] 71/6 138/18	reject [1] 37/10	repeat [2] 129/19 135/23	researched [1] 121/7	return [3] 27/13 28/3 124/20
recorded [4] 90/5 115/1 115/5 157/5	relate [1] 50/21	repeatedly [3] 149/6 156/15 158/16	requesting [3] 6/19 122/9 179/15	returned [1] 89/20
recording [1] 90/1	related [3] 16/4 67/16 170/9	replace [1] 19/7	requests [1] 59/10	reveal [1] 129/10
records [3] 76/5 114/4 121/11	relates [1] 161/22	replacement [1] 74/10	required [2] 9/14 117/13	revealed [5] 69/16 69/18 69/23 70/9 109/16
recoup [1] 29/15	relating [1] 101/10	replicate [2] 22/24 166/3	researched [1] 121/7	reversal [23] 37/25 38/2 38/3 43/5 43/6 44/9 44/10 51/9 51/12 51/25 104/9 131/15 134/21 135/10 135/14 137/22 137/23 138/2 138/5 139/4 140/7 145/23 147/11
recourse [2] 19/5 19/22	relation [22] 8/6 43/1 45/3 49/21 58/7 85/4 100/18 150/7 153/10 154/21 156/20 160/13 165/3 166/24 168/11 170/5 173/10 174/11 176/17 178/19 179/5 180/20	replies [1] 52/11	resenting [1] 78/22	reversals [7] 37/7 37/8 50/24 51/1 51/4 110/13 134/24
recover [2] 29/8 169/22	relative [1] 148/4	reply [6] 16/3 38/24 45/25 57/11 81/2 87/16	resolved [1] 28/12	reverse [1] 137/15
recovered [1] 9/15	relatively [2] 147/9 148/1	report [52] 4/12 7/24 14/16 24/8 36/16 44/19 44/20 46/2 46/4 46/5 46/7 46/11 46/13 46/15 46/19 47/6 54/20 54/20 57/1 57/10 57/25 58/9 58/19 58/22 60/17 60/24 61/2 61/10 67/16 67/20 71/13 71/15 81/18 92/7 93/19 95/5 107/2 119/6 121/23 123/13 123/15 127/10 127/15 128/5 129/10 129/21 147/10 147/15 156/16 158/11 175/11 176/6	resolves [1] 28/16	reversed [8] 38/17 39/15 51/6 51/8 51/11 137/19 137/21 139/7
recoveries [1] 142/18	relayed [2] 65/13 147/24	report [52] 4/12 7/24 14/16 24/8 36/16 44/19 44/20 46/2 46/4 46/5 46/7 46/11 46/13 46/15 46/19 47/6 54/20 54/20 57/1 57/10 57/25 58/9 58/19 58/22 60/17 60/24 61/2 61/10 67/16 67/20 71/13 71/15 81/18 92/7 93/19 95/5 107/2 119/6 121/23 123/13 123/15 127/10 127/15 128/5 129/10 129/21 147/10 147/15 156/16 158/11 175/11 176/6	resource [1] 117/2	reversing [1] 51/2
recovering [1] 142/24	released [1] 84/19	Report' [1] 56/13	respect [5] 74/14 97/24 106/14 119/3 132/17	review [21] 25/12 27/19 36/19 42/6 50/3 50/4 50/9 50/19 54/20 56/10 60/6 60/14 61/1 61/5 61/10 61/10 64/25 73/15 75/6 88/4 106/13
recovery [6] 28/18 135/3 142/22 143/1 146/7 147/12	relevant [7] 19/12 88/1 110/5 111/15 167/6 167/8 171/11	reported [4] 36/25 75/15 75/16 156/22	respected [2] 34/9 34/21	reversed [8] 38/17 39/15 51/6 51/8 51/11 137/19 137/21 139/7
redaction [2] 3/16 18/18	reliable [2] 141/14 142/2	reporting [7] 42/9 44/17 45/5 47/20 47/22 48/21 165/3	response [22] 4/23 19/18 19/18 28/2 44/1 45/22 45/23 57/9 60/19 60/20 64/7 71/16 72/25 110/22 110/24 111/8 111/21 114/9 131/25 132/2 146/18 147/5	reversing [1] 51/2
reduced [1] 9/20	relied [1] 107/10	reports [7] 41/24 62/24 75/21 80/13 96/13 132/6 157/23	response/explanatio n [1] 110/24	reversing [1] 51/2
reducing [1] 168/19	reluctance [1] 88/9	represent [3] 78/11 78/12 149/3	responses [2] 85/17 85/24	reversing [1] 51/2
refer [5] 149/25 150/12 160/16 171/11 171/25	rely [1] 97/25	representation [4] 11/6 11/19 12/19 12/24	responsibility [19] 47/8 59/3 85/20 99/14 108/4 108/21 109/7 121/6 132/23 132/24 133/2 133/3 140/22 164/11 164/13 171/5 171/23 173/22 176/20	reversing [1] 51/2
reference [2] 7/14 143/4	relying [1] 112/14	representative [1] 161/16	responsible [11] 2/6 2/12 18/10 76/16	reversing [1] 51/2
referred [7] 37/5 101/20 128/15 136/12 144/23 154/7 154/19	remain [2] 31/9 123/6			reversing [1] 51/2
referring [9] 7/3 26/1 27/25 58/14 115/25 116/10 117/2 155/5 172/5	remained [1] 10/11			reversing [1] 51/2
refers [1] 74/6	remains [1] 7/11			reversing [1] 51/2
refrain [1] 181/15	remember [34] 2/3 4/15 29/4 38/16 44/3 44/15 44/20 46/1 46/8 46/16 46/21 46/22 48/8 67/5 69/7 71/21 71/25 81/11 85/16 101/1 101/2 102/21 102/24 103/1 106/21 107/4 120/18 127/13 127/17 128/14 129/17 129/25 141/25 168/17			reversing [1] 51/2
refurbishment [1] 20/9	remembered [1]			reversing [1] 51/2
refused [1] 157/14				reversing [1] 51/2

<p>R</p> <p>right... [37] 102/9 103/12 109/18 111/11 115/24 116/2 116/8 126/8 130/1 131/8 133/13 147/22 148/14 150/15 150/18 152/2 152/18 152/18 153/20 154/6 154/11 155/3 155/9 156/12 157/6 158/15 158/18 163/9 165/7 166/22 167/15 168/9 171/8 172/8 173/1 175/15 182/4</p> <p>rights [1] 33/12</p> <p>rigorously [1] 99/2</p> <p>ring [9] 47/18 130/23 132/12 132/24 133/7 133/12 133/14 157/8 178/1</p> <p>ringing [1] 156/2</p> <p>rise [1] 37/11</p> <p>risk [1] 97/16</p> <p>road [5] 1/23 28/12 31/20 113/3 160/12</p> <p>Rob [1] 153/11</p> <p>robber [1] 6/24</p> <p>robbers [2] 7/19 9/17</p> <p>robbery [10] 6/20 7/14 7/17 7/25 9/7 9/12 9/22 28/20 28/25 29/6</p> <p>robust [1] 110/24</p> <p>rock [1] 161/3</p> <p>Rodric [8] 28/6 29/23 29/25 30/19 31/21 36/12 53/9 84/22</p> <p>Roger [4] 13/5 13/11 14/20 14/21</p> <p>role [15] 59/6 60/9 60/13 61/16 65/23 66/2 107/14 109/1 109/22 109/25 120/8 141/1 163/22 172/13 173/13</p> <p>roles [8] 2/25 59/5 75/22 164/15 170/10 170/17 172/1 172/8</p> <p>Roll [3] 110/23 111/5 111/14</p> <p>rolling [1] 157/20</p> <p>Ron [18] 36/19 39/10 39/24 48/25 49/4 49/7 50/1 53/13 53/21 56/7 63/16 86/3 90/2 94/13 95/2 95/8 95/14 96/8</p> <p>Ron's [1] 53/10</p> <p>room [4] 98/12 161/11 161/15 162/12</p> <p>rose [39] 36/16 39/20 39/22 41/7 41/11 41/18 46/6 46/11 46/12 47/1 47/6 47/6</p>	<p>47/14 49/22 56/13 56/25 57/10 57/16 57/25 58/4 58/9 58/19 58/22 99/5 99/13 104/5 104/6 104/8 110/8 119/6 119/6 130/19 131/5 131/9 131/25 133/20 145/17 146/3 147/23</p> <p>Rose's [2] 41/20 133/18</p> <p>roughly [2] 158/5 158/20</p> <p>route [5] 33/4 33/15 34/24 48/10 79/13</p> <p>routinely [1] 52/21</p> <p>Royal [1] 155/15</p> <p>ruined [1] 111/16</p> <p>rule [1] 98/7</p> <p>rum [1] 163/6</p> <p>rumbling [1] 172/23</p> <p>rumblings [11] 61/20 171/17 172/11 172/16 173/2 173/9 173/11 173/18 173/20 174/11 175/1</p> <p>run [1] 168/20</p> <p>running [5] 14/21 20/5 77/4 81/15 92/16</p> <p>rural [1] 170/18</p>	<p>162/23 163/5 164/15 165/13 167/18 175/17 178/18 179/4 180/18 181/5</p> <p>sale [1] 27/5</p> <p>sales [1] 93/3</p> <p>Sam [1] 149/2</p> <p>same [9] 21/10 21/21 40/5 72/4 75/13 122/2 150/17 158/10 159/24</p> <p>sat [1] 4/25</p> <p>satisfactory [1] 3/8</p> <p>saved [2] 155/6 155/9</p> <p>savings [2] 6/7 6/8</p> <p>saw [9] 15/1 46/21 46/22 108/6 128/4 128/6 129/3 130/11 176/1</p> <p>say [50] 5/22 6/12 9/15 17/1 17/2 25/1 36/7 38/13 44/14 45/7 45/8 48/7 54/2 60/12 67/7 67/9 68/7 70/20 74/22 90/14 90/23 93/1 99/12 104/1 105/11 105/15 105/21 119/21 122/21 126/22 132/24 134/24 137/12 141/2 141/9 149/13 151/25 153/9 154/21 158/22 159/18 160/7 160/23 165/8 170/21 170/24 172/17 174/5 176/24 177/3</p> <p>saying [73] 14/25 16/9 16/16 16/19 16/23 21/5 26/10 28/7 29/18 31/2 31/11 32/22 39/16 41/11 42/18 43/10 43/19 43/20 44/25 48/12 51/22 52/1 52/24 53/9 54/11 57/24 68/5 78/13 79/10 84/6 87/9 89/18 90/19 91/1 94/5 94/24 94/24 95/3 102/25 103/16 104/14 111/5 127/7 130/4 133/1 133/15 141/25 149/9 150/21 151/7 151/13 151/13 151/16 152/1 152/3 153/15 153/15 153/21 159/23 161/7 161/17 162/4 165/19 166/2 171/16 172/10 172/12 173/17 173/20 175/5 176/5 176/15 176/15</p> <p>says [26] 13/8 13/10 13/17 18/3 25/17 50/15 52/16 56/6 83/4 84/23 86/15 87/17 90/25 124/10 127/3</p>	<p>131/11 131/25 133/21 137/4 137/11 146/12 156/20 157/7 160/18 160/20 171/11</p> <p>scale [1] 64/15</p> <p>scan [1] 50/18</p> <p>scenario [1] 58/4</p> <p>scheme [88] 23/7 23/19 24/8 24/19 25/13 26/16 26/18 26/24 30/13 32/10 32/19 33/3 33/5 33/11 33/13 34/11 50/7 53/1 53/21 54/5 54/7 60/4 60/7 60/13 61/14 62/1 62/2 62/21 63/23 64/11 64/18 64/22 65/15 66/2 66/8 66/16 67/10 67/11 67/17 67/19 69/13 69/15 69/23 70/1 70/3 70/8 70/15 70/24 71/7 71/9 71/10 71/18 72/8 72/14 73/15 73/25 74/1 74/18 74/25 75/6 76/6 76/21 77/1 77/17 77/24 79/16 80/17 80/20 81/5 81/10 81/12 81/21 81/22 89/25 96/10 96/18 106/14 116/24 117/3 117/15 117/17 118/8 136/11 137/5 137/9 161/14 174/2 181/9</p> <p>scope [7] 47/9 48/4 48/13 72/8 73/23 79/16 79/16</p> <p>screen [9] 8/21 18/1 38/10 101/4 113/21 156/12 156/19 159/19 171/10</p> <p>scripts [5] 150/10 150/12 155/6 160/4 160/7</p> <p>scroll [24] 2/21 10/20 13/4 13/13 16/3 25/1 39/19 49/24 52/9 57/2 59/1 82/23 82/25 83/1 86/12 86/14 87/16 87/22 93/22 106/7 114/9 114/10 123/18 146/11</p> <p>scrolling [4] 86/23 86/24 93/23 93/23</p> <p>scrupulously [1] 181/25</p> <p>seat [1] 108/17</p> <p>second [69] 1/9 1/12 4/12 4/23 5/7 6/14 23/4 27/20 33/21 36/15 37/1 40/20 43/8 48/25 49/1 53/21 54/9 54/21 54/24 55/5 55/7 55/16 55/17 60/19</p>	<p>60/22 60/24 63/18 63/20 63/24 64/4 64/8 71/14 72/2 73/13 73/18 75/2 78/1 78/14 78/14 78/23 79/13 82/13 83/4 84/6 84/14 85/22 86/4 87/18 87/24 88/4 88/12 88/15 89/18 95/15 96/1 115/9 116/19 117/14 117/16 119/5 122/11 123/17 130/12 143/18 144/14 156/25 161/13 174/20 175/10</p> <p>secondly [2] 56/25 151/7</p> <p>secrecy [1] 36/1</p> <p>Secretariat [1] 65/23</p> <p>section [1] 167/8</p> <p>secure [5] 8/8 8/11 8/17 8/19 9/2</p> <p>security [5] 6/25 7/24 117/9 132/17 134/11</p> <p>see [95] 2/20 2/21 2/22 5/16 7/24 8/22 10/17 13/4 13/13 13/14 27/2 30/4 30/12 31/16 32/2 36/23 40/4 40/23 41/16 41/21 45/7 46/12 46/15 49/21 60/22 63/4 63/19 69/10 70/6 72/3 73/1 75/5 76/3 83/1 83/14 84/20 86/6 86/8 92/16 93/11 93/15 95/13 96/12 100/8 101/4 101/13 102/9 102/13 103/17 103/21 104/4 104/14 106/7 107/20 108/12 109/25 112/6 116/4 119/20 122/12 122/13 122/19 122/24 123/7 123/7 124/9 124/16 126/6 131/4 131/10 132/2 133/13 134/3 134/6 135/14 143/4 143/5 143/7 144/22 145/9 146/6 152/6 152/15 153/1 156/3 156/19 157/1 158/15 159/8 160/10 163/12 164/23 174/10 174/17 180/12</p> <p>seeing [5] 37/12 44/20 91/6 102/21 147/22</p> <p>seek [3] 7/1 28/18 179/20</p> <p>seeking [4] 56/9 79/15 84/7 84/10</p> <p>seem [2] 46/8 171/18</p> <p>seemed [1] 153/7</p> <p>seems [8] 51/9 68/4 72/16 72/21 77/6</p>
---	---	--	--	---

S	served [4] 2/8 20/20 25/3 33/2	156/1 156/3 156/4 156/10 156/14 156/14 156/22 157/8 157/15 157/20 157/20 157/21 157/25 157/25 158/2 158/13 158/18 158/21 158/24 158/24 159/3 160/13 160/14 160/15 160/18 160/20 160/21 160/22 161/7 161/18 165/21 177/7 177/11 177/14 177/15 177/18	154/1 157/19 158/17 158/25 159/3 159/4 159/6 159/7 159/9 162/9 163/6 165/19 165/21 165/21 166/25 167/3 167/11 167/15 167/19 167/19 167/20 167/22 174/18 176/17 179/21	simply [7] 16/25 19/9 19/10 26/2 54/8 143/14 162/17 since [7] 18/9 77/18 98/22 155/20 157/14 157/18 157/24 single [1] 137/11 sir [25] 1/6 17/22 49/11 69/17 69/24 79/24 82/12 96/22 97/8 98/10 98/24 99/3 116/10 118/21 118/22 130/3 140/16 141/16 145/1 145/3 148/17 148/21 149/1 181/22 182/5 Sir Anthony [4] 69/17 69/24 79/24 141/16 Sir Wyn [1] 116/10 sister [2] 14/4 14/15 sit [1] 4/17 sits [1] 119/4 sitting [6] 76/23 95/19 108/16 113/2 152/22 181/11 situation [9] 4/4 21/1 26/1 26/12 34/18 39/3 39/9 152/19 163/25 situations [1] 142/11 six [3] 67/24 95/12 113/12 size [4] 18/20 93/5 170/9 170/18 skillset [1] 117/12 skin [1] 134/10 slavery [1] 116/5 sledge [1] 8/21 sleep [1] 160/14 slide [2] 75/4 76/16 slight [1] 98/25 slightly [3] 37/16 82/15 167/15 slip [1] 28/2 slot [1] 140/13 slowly [1] 87/1 small [7] 41/14 63/7 66/8 66/22 134/2 152/8 169/9 smaller [2] 64/12 69/16 snapshot [1] 125/5 so [352] so-called [1] 6/10 software [2] 6/15 105/14 solely [1] 18/9 solicitor [8] 30/2 30/3 30/4 30/20 30/25 31/1 34/9 36/13 solicitors [3] 55/25 179/15 180/7 solution [1] 179/18 some [72] 1/8 1/10
seems... [3] 173/1 173/16 177/22	service [3] 25/5 136/7 170/19	shouldn't [3] 54/21 85/13 126/17		
seen [33] 4/7 32/20 39/5 41/1 43/23 44/3 44/18 44/22 46/17 61/7 62/10 71/23 77/18 85/24 88/25 93/17 93/18 96/2 103/8 105/25 106/20 108/18 126/12 127/7 128/5 136/3 136/5 137/19 138/7 145/18 148/9 150/24 174/3	services [4] 155/1 171/13 172/7 178/4	show [5] 2/17 43/12 43/13 111/4 135/9		
session [1] 146/7	session [1] 146/7	showed [5] 51/19 51/25 126/9 133/5 172/19		
sessions [2] 163/20 163/21	set [20] 20/12 23/22 33/18 62/17 69/6 69/9 77/2 77/10 77/14 81/15 86/21 87/25 89/23 122/9 140/20 153/25 154/4 172/9 175/11 176/18	shown [4] 5/13 45/15 52/3 93/8		
set [20] 20/12 23/22 33/18 62/17 69/6 69/9 77/2 77/10 77/14 81/15 86/21 87/25 89/23 122/9 140/20 153/25 154/4 172/9 175/11 176/18	sets [3] 122/21 156/14 156/15	shows [3] 92/5 122/6 142/14		
setting [4] 28/11 30/19 60/3 158/12	settle [2] 30/5 36/2	Shunned [1] 177/12		
settled [1] 34/15	settlement [14] 22/14 25/15 26/11 28/8 28/10 30/1 31/9 34/13 35/5 35/8 35/12 35/24 36/10 179/21	shut [2] 8/23 158/19		
several [4] 75/14 101/3 167/24 168/8	severe [4] 5/23 6/18 18/17 113/15	sick [1] 124/22		
shape [1] 80/1	share [4] 40/20 46/2 88/10 128/17	side [8] 5/25 50/5 65/15 65/18 118/17 118/18 144/7 144/22		
shared [2] 7/7 49/4	Shareholder [2] 64/2 64/14	sides [1] 17/24		
sharing [1] 53/25	sharks [1] 164/7	Sight [51] 1/9 1/13 4/12 4/23 5/7 6/14 23/4 33/21 40/20 48/25 49/1 53/22 54/10 54/21 54/24 55/6 55/7 55/16 55/17 60/19 60/22 60/24 63/18 63/24 64/4 64/8 71/14 73/14 73/18 75/2 78/1 78/14 78/14 78/23 79/13 83/4 84/6 84/14 85/22 87/18 87/24 88/4 88/12 88/15 89/18 116/19 117/14 117/16 143/18 144/14 174/20		
she [113] 4/21 4/22 4/25 18/3 18/17 21/2 21/19 24/7 24/10 24/11 30/12 31/25 32/8 33/19 33/21 33/22 33/23 34/9 34/17 34/18 34/25 40/4 42/18 42/18 42/20 42/20 43/9 43/10 44/19 44/19 44/21 44/21 44/24 45/5 46/15 47/24 47/25 48/9 48/10 48/20 50/2 50/8 50/10 63/25 74/8 74/9 74/9 96/2 101/25 101/25 104/11 104/11 104/12 104/12 109/12 109/16 120/15 120/23 122/18 123/16 125/16 125/17 125/24 126/1 126/2 126/12 126/12 127/3 131/25 132/19 132/22 145/6 145/6 146/17 155/22 155/23 155/25	shorter [3] 118/18 118/18 118/19	Sight's [3] 27/20 86/4 175/11		
shortage [4] 123/23 125/15 153/1 157/4	shortages [3] 6/1 6/10 12/11	sighted [1] 17/7		
shortfalls [9] 2/4 23/6 113/6 149/8 152/5 153/4 160/5 161/6 177/1	shortfall [21] 3/12 86/18 86/21 113/9 122/17 124/3 124/8 126/10 126/11 151/3 151/6 151/14 152/9 152/11 156/6 159/25 169/4 169/20 170/1 177/8 181/9	sign [5] 8/19 27/13 28/2 28/3 34/25		
shortly [1] 133/5	should [72] 4/23 9/15 14/4 27/21 31/23 34/14 36/7 37/3 39/18 41/5 51/4 52/21 52/25 53/15 53/18 54/9 54/17 54/18 55/21 57/17 59/17 59/21 59/25 60/10 66/8 66/8 66/9 71/21 72/10 81/20 81/23 85/1 85/13 87/4 89/20 95/10 97/23 98/8 101/17 108/15 108/22 114/5 115/21 117/9 126/16 133/9 147/2	signed [4] 72/10 114/9 122/13 124/21 significance [11] 56/13 58/23 103/15 103/25 104/15 104/16 104/21 104/23 104/24 106/19 106/21 significant [8] 1/11 1/17 39/8 74/5 83/25 85/7 106/12 166/5		
shortly [1] 133/5	should [72] 4/23 9/15 14/4 27/21 31/23 34/14 36/7 37/3 39/18 41/5 51/4 52/21 52/25 53/15 53/18 54/9 54/17 54/18 55/21 57/17 59/17 59/21 59/25 60/10 66/8 66/8 66/9 71/21 72/10 81/20 81/23 85/1 85/13 87/4 89/20 95/10 97/23 98/8 101/17 108/15 108/22 114/5 115/21 117/9 126/16 133/9 147/2	signing [1] 34/24		
shortly [1] 133/5	should [72] 4/23 9/15 14/4 27/21 31/23 34/14 36/7 37/3 39/18 41/5 51/4 52/21 52/25 53/15 53/18 54/9 54/17 54/18 55/21 57/17 59/17 59/21 59/25 60/10 66/8 66/8 66/9 71/21 72/10 81/20 81/23 85/1 85/13 87/4 89/20 95/10 97/23 98/8 101/17 108/15 108/22 114/5 115/21 117/9 126/16 133/9 147/2	similar [3] 4/4 150/15 179/7		
shortly [1] 133/5	should [72] 4/23 9/15 14/4 27/21 31/23 34/14 36/7 37/3 39/18 41/5 51/4 52/21 52/25 53/15 53/18 54/9 54/17 54/18 55/21 57/17 59/17 59/21 59/25 60/10 66/8 66/8 66/9 71/21 72/10 81/20 81/23 85/1 85/13 87/4 89/20 95/10 97/23 98/8 101/17 108/15 108/22 114/5 115/21 117/9 126/16 133/9 147/2	simple [2] 147/9 148/1		
shortly [1] 133/5	should [72] 4/23 9/15 14/4 27/21 31/23 34/14 36/7 37/3 39/18 41/5 51/4 52/21 52/25 53/15 53/18 54/9 54/17 54/18 55/21 57/17 59/17 59/21 59/25 60/10 66/8 66/8 66/9 71/21 72/10 81/20 81/23 85/1 85/13 87/4 89/20 95/10 97/23 98/8 101/17 108/15 108/22 114/5 115/21 117/9 126/16 133/9 147/2	simplicity [1] 148/4		

S				
some... [70] 1/11 1/21 2/2 3/8 5/15 8/25 9/14 10/25 14/19 23/24 24/2 30/21 32/20 36/21 37/8 37/13 41/1 41/25 42/18 46/17 47/16 52/9 61/20 62/3 62/10 68/18 70/15 70/16 71/17 71/20 71/23 80/1 83/18 85/17 85/21 93/14 100/15 103/2 104/18 108/19 110/3 111/16 125/18 127/18 128/13 129/12 130/22 132/6 133/6 140/21 142/11 142/20 142/25 146/13 147/2 150/12 152/25 153/25 162/19 163/5 164/16 165/14 165/17 165/21 167/25 168/1 170/10 170/15 172/16 176/15 somebody [12] 14/5 14/7 46/18 48/2 81/9 85/19 89/5 133/3 138/1 151/20 156/3 156/4 someone [6] 136/19 151/17 157/8 162/17 162/18 169/4 someone's [1] 129/22 something [21] 5/3 14/24 31/18 41/2 44/3 72/18 73/6 76/13 85/3 96/14 108/12 134/11 143/19 146/9 148/9 152/21 153/7 155/12 165/8 174/5 180/19 sometimes [3] 151/24 151/24 164/7 son [3] 5/23 7/4 11/13 soonest [1] 37/3 Sophie [4] 73/2 73/3 73/8 73/9 sorry [49] 4/15 14/24 15/22 17/18 17/22 23/13 29/25 32/12 32/18 36/8 38/16 39/2 41/5 42/24 50/4 53/22 59/1 71/9 74/16 75/10 75/20 75/21 78/17 82/24 83/14 83/21 98/20 99/12 99/19 100/9 101/25 104/1 106/21 114/21 121/15 124/5 128/1 130/2 134/21 136/2 137/14 139/1 139/17 140/25 149/16 158/24 165/6	171/25 178/14 sort [1] 8/25 sorted [1] 42/23 sought [1] 120/25 sound [2] 98/20 170/13 sounded [1] 42/3 sounds [2] 2/3 47/7 soup [1] 23/12 source [4] 50/17 87/24 150/8 150/14 South [3] 50/11 61/3 122/5 South Warnborough [1] 122/5 space [1] 132/22 Sparrow [3] 59/4 108/6 110/1 speak [6] 17/17 17/22 42/24 47/4 109/13 176/7 speaking [2] 17/18 18/5 specialist [1] 13/19 specialists [1] 114/14 specific [6] 74/16 88/8 109/6 139/13 139/24 151/22 specifically [3] 81/11 84/16 160/1 speculation [1] 5/6 speed [1] 83/18 speedy [1] 178/24 spent [1] 181/8 spin [1] 109/15 spoke [1] 157/17 spoken [4] 13/11 34/16 158/8 158/10 spot [8] 36/19 42/5 50/19 64/25 67/14 71/14 73/15 91/23 spreadsheet [2] 147/10 147/25 spreadsheets [2] 87/25 146/1 SPSO [1] 122/5 squeeze [1] 116/14 SSL0000116 [1] 89/25 staff [5] 6/22 50/23 51/1 132/10 149/12 stage [4] 37/17 52/20 80/14 95/15 staged [2] 29/11 29/19 staging [2] 30/15 35/8 stake [1] 119/24 stakeholders [5] 77/22 77/25 78/2 78/14 78/15 stamped [1] 38/13 stand [2] 106/1	112/19 standard [2] 35/23 135/9 start [30] 1/10 1/21 36/22 40/6 41/4 49/18 55/23 62/1 64/21 64/22 66/11 66/15 66/19 67/9 67/22 67/24 68/3 68/5 68/10 70/3 71/11 73/13 73/24 76/15 77/11 79/23 82/22 117/14 129/1 156/4 started [13] 41/5 48/16 53/21 62/5 66/16 79/25 83/22 113/6 123/17 172/14 173/23 173/24 180/15 starts [1] 49/25 state [2] 3/14 161/24 stated [8] 7/4 8/16 19/13 56/8 95/25 122/16 161/21 178/8 statement [18] 1/15 45/7 60/5 60/10 96/1 100/13 122/21 140/21 154/21 154/23 160/16 160/19 160/23 170/21 171/9 171/25 172/10 182/2 states [1] 56/17 stating [1] 6/16 Staughton [2] 155/19 160/10 stay [3] 56/9 56/15 56/20 steal [1] 142/10 stealing [2] 141/22 142/6 Stein [4] 148/19 148/25 149/3 183/14 step [1] 35/17 stepped [4] 10/7 172/1 173/13 173/21 sterling [3] 91/9 91/20 92/3 steroids [1] 91/19 stick [1] 161/2 still [20] 11/9 24/11 28/22 29/1 29/2 29/5 29/7 35/25 70/14 76/19 87/18 90/19 93/18 105/18 105/25 113/10 127/4 159/5 175/5 177/15 stir [1] 5/3 stock [2] 8/7 123/21 stocking [1] 8/15 stolen [3] 93/17 93/21 160/21 stood [2] 8/8 8/16 stop [5] 29/14 72/9 73/21 86/24 142/24 stopped [1] 9/1	stopping [5] 25/17 55/20 83/11 167/1 167/2 stored [3] 155/13 155/14 155/17 straight [1] 96/25 strain [1] 3/19 strands [1] 56/21 strategy [7] 178/10 179/1 179/9 179/16 180/8 180/11 180/14 strength [2] 112/25 116/6 stress [2] 18/18 160/14 string [4] 41/12 45/9 133/24 145/21 strong [1] 95/16 strongly [2] 92/8 94/21 structure [3] 22/15 167/23 170/14 structured [4] 22/13 24/3 24/9 32/6 struggling [1] 18/15 Stuart [2] 123/20 123/22 studied [1] 90/18 studies [2] 120/10 121/7 stuff [1] 92/16 sub [1] 5/23 subject [5] 11/1 22/13 24/8 27/7 71/16 submission [1] 68/16 subpostmaster [23] 2/1 3/6 7/6 12/23 16/5 25/16 39/14 110/14 110/15 113/2 122/16 123/2 141/4 141/11 150/20 152/5 152/8 154/7 157/23 158/3 169/6 169/10 169/14 subpostmaster's [1] 170/1 subpostmasters [34] 11/5 15/21 22/17 25/9 37/5 46/3 54/12 55/2 55/15 62/3 68/24 69/2 69/24 70/25 140/18 140/23 141/5 141/8 149/4 149/6 149/9 149/13 150/18 152/19 154/13 161/5 163/17 163/25 164/5 166/12 174/8 174/14 175/13 177/9 subpostmasters' [5] 112/7 112/21 112/24 180/22 181/2 subpostmasters/mist resses [1] 149/4 subpostmistress [1] 155/19	subpostmistresses [1] 161/6 subsequent [3] 44/18 92/19 105/19 subsequently [4] 6/23 48/7 95/25 109/11 substance [2] 61/17 61/19 substantive [1] 178/21 successful [1] 27/11 such [8] 18/20 40/13 51/4 56/15 98/5 129/20 144/13 144/15 Sue [1] 101/10 suffering [4] 111/18 118/1 118/4 155/23 suffers [1] 160/14 suggest [9] 99/21 105/9 106/3 107/15 109/7 110/7 112/6 117/4 117/24 suggested [3] 2/11 32/1 87/16 suggesting [3] 53/2 53/4 108/24 suggestion [1] 117/9 suggests [1] 6/25 suicide [1] 12/2 suing [1] 29/2 suitability [1] 141/10 suitable [1] 27/9 sum [1] 25/8 summarise [1] 54/11 summarises [1] 129/7 summary [10] 8/2 37/15 68/15 85/19 90/10 123/9 126/3 127/5 128/9 128/13 summer [1] 67/22 summons [1] 122/23 sums [7] 29/15 68/19 83/25 85/7 141/22 152/20 164/2 sunny [1] 162/5 supplied [1] 37/21 support [25] 6/1 10/13 18/12 21/15 24/21 39/11 39/23 81/14 81/19 130/5 139/15 139/19 155/1 171/13 175/9 175/11 175/20 175/21 175/24 176/16 176/19 178/3 178/4 179/24 180/1 supported [5] 18/22 61/13 129/7 179/22 180/10 supporting [2] 136/13 181/12 suppose [1] 117/11 supposed [1] 64/7

S	systemic [1] 74/23	97/2 101/25 102/3	84/25 85/4 91/10	164/10 169/12 170/2
suppressing [1] 112/15	systems [2] 84/3 91/18	106/25 107/12 108/20 112/14 114/3 117/9 132/18 136/22 153/16 153/22 154/3 159/15 171/5 171/20 171/24 172/13 173/22 181/12	92/12 104/10 130/10 164/8 170/8 178/4 178/24 180/5 181/9 thank [47] 2/19 7/24 8/3 9/5 17/9 36/14 38/23 40/6 41/18 49/10 60/2 60/2 63/14 72/3 82/21 83/2 86/9 89/23 93/24 94/20 96/20 98/10 98/19 98/24 99/3 118/9 119/19 123/14 123/20 131/2 140/11 140/12 140/16 145/1 145/2 145/20 146/16 146/23 148/13 148/19 148/21 149/1 172/4 179/13 181/20 181/23 182/1	170/2 172/14 172/15 173/11 173/25 174/20 174/20 175/24 176/18 177/18 178/2 180/16 180/21
sure [20] 9/9 17/1 18/11 41/13 43/16 44/25 45/3 48/10 89/4 107/3 109/24 128/4 128/6 133/25 142/23 147/14 167/17 175/4 175/4 177/19	T	technology [1] 108/25	thanks [6] 13/18 31/15 40/11 132/2 146/17 182/6	theft [12] 90/21 123/5 124/13 125/10 125/14 125/17 125/19 126/9 126/14 127/3 127/4 129/13
surely [5] 3/12 113/25 126/12 132/24 163/6	TA [2] 57/18 58/16	Telegraph [1] 3/23	that [1156]	their [31] 6/7 6/8 12/22 20/7 21/12 21/12 53/12 53/23 61/1 61/11 64/8 68/7 69/3 71/2 79/13 89/19 107/1 117/14 138/1 141/21 149/14 149/21 153/23 153/24 154/19 163/22 163/25 169/20 174/23 176/17 180/1
surplus [2] 86/18 86/20	tablet [1] 155/22	telephone [2] 90/1 90/2	that's [149] 1/25 2/7 4/7 6/9 7/2 7/18 10/3 14/9 16/2 16/16 16/24 21/19 22/8 22/17 23/12 23/21 24/9 25/8 26/24 30/17 30/19 31/6 33/18 35/20 39/16 39/17 40/9 40/10 42/18 43/15 43/20 45/2 45/5 45/16 50/8 50/13 51/24 52/4 52/10 53/2 53/4 54/14 57/7 57/7 57/12 57/16 57/25 58/5 58/14 62/17 64/7 65/13 67/15 68/8 68/23 72/24 75/1 76/6 77/5 77/14 78/18 78/18 79/3 79/12 79/25 80/25 81/2 89/1 89/12 89/18 89/21 90/15 91/10 91/11 93/5 94/24 94/25 95/7 97/9 98/17 102/12 103/4 105/1 106/3 106/6 108/8 109/15 109/16 109/18 115/22 116/9 116/13 116/17 120/14 121/21 121/22 127/13 129/16 131/1 131/21 133/15 133/17 136/25 138/4 138/6 138/19 138/20 141/6 141/12 143/23 145/1 146/20 147/16 149/12 150/12 151/4 151/9 151/17 154/3 154/4 155/2 156/9 156/13 158/19 159/1 159/12 160/5 160/15 160/25 161/6 161/7 162/4 162/18	them [53] 2/6 9/18 12/8 12/24 13/6 21/13 21/15 34/1 37/9 37/22 51/5 52/4 52/19 53/24 54/14 55/18 70/25 78/6 81/23 82/3 84/25 85/17 85/18 100/13 107/1 113/8 116/24 117/17 120/12 120/12 128/16 130/11 137/13 137/14 139/10 139/23 144/21 150/12 151/13 151/21 151/21 154/17 155/5 157/9 163/19 165/13 165/14 166/16 171/21 171/22 175/17 177/2 181/2
Susan [9] 4/17 5/4 10/24 13/18 65/2 74/8 79/5 79/7 79/10	tackle [2] 41/14 134/2	tell [22] 1/15 34/5 34/8 34/19 60/4 60/9 70/25 97/23 98/5 98/16 113/17 128/19 137/13 137/14 139/23 140/25 146/7 153/18 160/4 175/25 176/4 176/7	that's [149] 1/25 2/7 4/7 6/9 7/2 7/18 10/3 14/9 16/2 16/16 16/24 21/19 22/8 22/17 23/12 23/21 24/9 25/8 26/24 30/17 30/19 31/6 33/18 35/20 39/16 39/17 40/9 40/10 42/18 43/15 43/20 45/2 45/5 45/16 50/8 50/13 51/24 52/4 52/10 53/2 53/4 54/14 57/7 57/7 57/12 57/16 57/25 58/5 58/14 62/17 64/7 65/13 67/15 68/8 68/23 72/24 75/1 76/6 77/5 77/14 78/18 78/18 79/3 79/12 79/25 80/25 81/2 89/1 89/12 89/18 89/21 90/15 91/10 91/11 93/5 94/24 94/25 95/7 97/9 98/17 102/12 103/4 105/1 106/3 106/6 108/8 109/15 109/16 109/18 115/22 116/9 116/13 116/17 120/14 121/21 121/22 127/13 129/16 131/1 131/21 133/15 133/17 136/25 138/4 138/6 138/19 138/20 141/6 141/12 143/23 145/1 146/20 147/16 149/12 150/12 151/4 151/9 151/17 154/3 154/4 155/2 156/9 156/13 158/19 159/1 159/12 160/5 160/15 160/25 161/6 161/7 162/4 162/18	theft [12] 90/21 123/5 124/13 125/10 125/14 125/17 125/19 126/9 126/14 127/3 127/4 129/13
Susan's [1] 5/1	tactics [1] 71/8	technology [1] 108/25	that's [149] 1/25 2/7 4/7 6/9 7/2 7/18 10/3 14/9 16/2 16/16 16/24 21/19 22/8 22/17 23/12 23/21 24/9 25/8 26/24 30/17 30/19 31/6 33/18 35/20 39/16 39/17 40/9 40/10 42/18 43/15 43/20 45/2 45/5 45/16 50/8 50/13 51/24 52/4 52/10 53/2 53/4 54/14 57/7 57/7 57/12 57/16 57/25 58/5 58/14 62/17 64/7 65/13 67/15 68/8 68/23 72/24 75/1 76/6 77/5 77/14 78/18 78/18 79/3 79/12 79/25 80/25 81/2 89/1 89/12 89/18 89/21 90/15 91/10 91/11 93/5 94/24 94/25 95/7 97/9 98/17 102/12 103/4 105/1 106/3 106/6 108/8 109/15 109/16 109/18 115/22 116/9 116/13 116/17 120/14 121/21 121/22 127/13 129/16 131/1 131/21 133/15 133/17 136/25 138/4 138/6 138/19 138/20 141/6 141/12 143/23 145/1 146/20 147/16 149/12 150/12 151/4 151/9 151/17 154/3 154/4 155/2 156/9 156/13 158/19 159/1 159/12 160/5 160/15 160/25 161/6 161/7 162/4 162/18	their [31] 6/7 6/8 12/22 20/7 21/12 21/12 53/12 53/23 61/1 61/11 64/8 68/7 69/3 71/2 79/13 89/19 107/1 117/14 138/1 141/21 149/14 149/21 153/23 153/24 154/19 163/22 163/25 169/20 174/23 176/17 180/1
suspect [2] 83/6 92/8	tail [1] 17/21	telling [9] 68/4 80/3 147/23 154/17 156/10 158/16 160/21 166/15 181/12	that's [149] 1/25 2/7 4/7 6/9 7/2 7/18 10/3 14/9 16/2 16/16 16/24 21/19 22/8 22/17 23/12 23/21 24/9 25/8 26/24 30/17 30/19 31/6 33/18 35/20 39/16 39/17 40/9 40/10 42/18 43/15 43/20 45/2 45/5 45/16 50/8 50/13 51/24 52/4 52/10 53/2 53/4 54/14 57/7 57/7 57/12 57/16 57/25 58/5 58/14 62/17 64/7 65/13 67/15 68/8 68/23 72/24 75/1 76/6 77/5 77/14 78/18 78/18 79/3 79/12 79/25 80/25 81/2 89/1 89/12 89/18 89/21 90/15 91/10 91/11 93/5 94/24 94/25 95/7 97/9 98/17 102/12 103/4 105/1 106/3 106/6 108/8 109/15 109/16 109/18 115/22 116/9 116/13 116/17 120/14 121/21 121/22 127/13 129/16 131/1 131/21 133/15 133/17 136/25 138/4 138/6 138/19 138/20 141/6 141/12 143/23 145/1 146/20 147/16 149/12 150/12 151/4 151/9 151/17 154/3 154/4 155/2 156/9 156/13 158/19 159/1 159/12 160/5 160/15 160/25 161/6 161/7 162/4 162/18	them [53] 2/6 9/18 12/8 12/24 13/6 21/13 21/15 34/1 37/9 37/22 51/5 52/4 52/19 53/24 54/14 55/18 70/25 78/6 81/23 82/3 84/25 85/17 85/18 100/13 107/1 113/8 116/24 117/17 120/12 120/12 128/16 130/11 137/13 137/14 139/10 139/23 144/21 150/12 151/13 151/21 151/21 154/17 155/5 157/9 163/19 165/13 165/14 166/16 171/21 171/22 175/17 177/2 181/2
suspended [2] 122/17 177/12	take [35] 5/24 12/16 12/20 35/17 40/1 41/13 43/16 44/16 44/24 45/1 45/3 45/6 47/20 47/21 48/21 49/11 52/18 61/15 75/14 82/12 83/20 87/18 89/2 98/22 107/1 115/18 119/23 133/25 135/17 156/16 160/22 161/12 163/6 164/12 170/22	tells [3] 14/23 52/18 105/9	that's [149] 1/25 2/7 4/7 6/9 7/2 7/18 10/3 14/9 16/2 16/16 16/24 21/19 22/8 22/17 23/12 23/21 24/9 25/8 26/24 30/17 30/19 31/6 33/18 35/20 39/16 39/17 40/9 40/10 42/18 43/15 43/20 45/2 45/5 45/16 50/8 50/13 51/24 52/4 52/10 53/2 53/4 54/14 57/7 57/7 57/12 57/16 57/25 58/5 58/14 62/17 64/7 65/13 67/15 68/8 68/23 72/24 75/1 76/6 77/5 77/14 78/18 78/18 79/3 79/12 79/25 80/25 81/2 89/1 89/12 89/18 89/21 90/15 91/10 91/11 93/5 94/24 94/25 95/7 97/9 98/17 102/12 103/4 105/1 106/3 106/6 108/8 109/15 109/16 109/18 115/22 116/9 116/13 116/17 120/14 121/21 121/22 127/13 129/16 131/1 131/21 133/15 133/17 136/25 138/4 138/6 138/19 138/20 141/6 141/12 143/23 145/1 146/20 147/16 149/12 150/12 151/4 151/9 151/17 154/3 154/4 155/2 156/9 156/13 158/19 159/1 159/12 160/5 160/15 160/25 161/6 161/7 162/4 162/18	theft [12] 90/21 123/5 124/13 125/10 125/14 125/17 125/19 126/9 126/14 127/3 127/4 129/13
suspense [16] 83/4 83/17 83/21 84/7 84/16 85/8 85/25 86/5 86/20 87/3 87/9 88/5 88/10 88/22 88/25 89/9	taken [17] 8/12 10/10 10/15 19/8 26/17 89/21 95/9 101/15 125/22 126/20 135/20 135/21 135/23 146/14 164/11 167/2 179/16	terms [55] 9/8 21/4 25/18 25/20 25/23 32/19 34/7 36/5 45/3 53/4 57/15 57/21 61/22 62/6 62/9 62/13 62/15 62/24 66/4 67/9 67/19 69/6 72/8 73/22 73/23 75/22 76/22 76/23 76/24 80/20 85/13 85/14 91/3 100/4 104/21 106/20 106/21 108/21 109/3 109/5 122/7 127/17 134/23 135/3 136/19 138/5 149/23 150/15 151/21 153/23 167/10 167/12 167/13 172/1 173/20	that's [149] 1/25 2/7 4/7 6/9 7/2 7/18 10/3 14/9 16/2 16/16 16/24 21/19 22/8 22/17 23/12 23/21 24/9 25/8 26/24 30/17 30/19 31/6 33/18 35/20 39/16 39/17 40/9 40/10 42/18 43/15 43/20 45/2 45/5 45/16 50/8 50/13 51/24 52/4 52/10 53/2 53/4 54/14 57/7 57/7 57/12 57/16 57/25 58/5 58/14 62/17 64/7 65/13 67/15 68/8 68/23 72/24 75/1 76/6 77/5 77/14 78/18 78/18 79/3 79/12 79/25 80/25 81/2 89/1 89/12 89/18 89/21 90/15 91/10 91/11 93/5 94/24 94/25 95/7 97/9 98/17 102/12 103/4 105/1 106/3 106/6 108/8 109/15 109/16 109/18 115/22 116/9 116/13 116/17 120/14 121/21 121/22 127/13 129/16 131/1 131/21 133/15 133/17 136/25 138/4 138/6 138/19 138/20 141/6 141/12 143/23 145/1 146/20 147/16 149/12 150/12 151/4 151/9 151/17 154/3 154/4 155/2 156/9 156/13 158/19 159/1 159/12 160/5 160/15 160/25 161/6 161/7 162/4 162/18	them [53] 2/6 9/18 12/8 12/24 13/6 21/13 21/15 34/1 37/9 37/22 51/5 52/4 52/19 53/24 54/14 55/18 70/25 78/6 81/23 82/3 84/25 85/17 85/18 100/13 107/1 113/8 116/24 117/17 120/12 120/12 128/16 130/11 137/13 137/14 139/10 139/23 144/21 150/12 151/13 151/21 151/21 154/17 155/5 157/9 163/19 165/13 165/14 166/16 171/21 171/22 175/17 177/2 181/2
Sutton [1] 1/23	talking [20] 15/5 16/5 36/3 36/4 44/11 65/3 71/9 83/11 104/1 105/17 120/5 136/18 138/23 139/13 139/14 139/18 139/24 151/22 173/6 174/11	tended [1] 59/9	that's [149] 1/25 2/7 4/7 6/9 7/2 7/18 10/3 14/9 16/2 16/16 16/24 21/19 22/8 22/17 23/12 23/21 24/9 25/8 26/24 30/17 30/19 31/6 33/18 35/20 39/16 39/17 40/9 40/10 42/18 43/15 43/20 45/2 45/5 45/16 50/8 50/13 51/24 52/4 52/10 53/2 53/4 54/14 57/7 57/7 57/12 57/16 57/25 58/5 58/14 62/17 64/7 65/13 67/15 68/8 68/23 72/24 75/1 76/6 77/5 77/14 78/18 78/18 79/3 79/12 79/25 80/25 81/2 89/1 89/12 89/18 89/21 90/15 91/10 91/11 93/5 94/24 94/25 95/7 97/9 98/17 102/12 103/4 105/1 106/3 106/6 108/8 109/15 109/16 109/18 115/22 116/9 116/13 116/17 120/14 121/21 121/22 127/13 129/16 131/1 131/21 133/15 133/17 136/25 138/4 138/6 138/19 138/20 141/6 141/12 143/23 145/1 146/20 147/16 149/12 150/12 151/4 151/9 151/17 154/3 154/4 155/2 156/9 156/13 158/19 159/1 159/12 160/5 160/15 160/25 161/6 161/7 162/4 162/18	theft [12] 90/21 123/5 124/13 125/10 125/14 125/17 125/19 126/9 126/14 127/3 127/4 129/13
Swinson [1] 11/1	talk [8] 16/12 16/16 16/23 17/2 21/17 39/4 91/7 152/18	terms [55] 9/8 21/4 25/18 25/20 25/23 32/19 34/7 36/5 45/3 53/4 57/15 57/21 61/22 62/6 62/9 62/13 62/15 62/24 66/4 67/9 67/19 69/6 72/8 73/22 73/23 75/22 76/22 76/23 76/24 80/20 85/13 85/14 91/3 100/4 104/21 106/20 106/21 108/21 109/3 109/5 122/7 127/17 134/23 135/3 136/19 138/5 149/23 150/15 151/21 153/23 167/10 167/12 167/13 172/1 173/20	that's [149] 1/25 2/7 4/7 6/9 7/2 7/18 10/3 14/9 16/2 16/16 16/24 21/19 22/8 22/17 23/12 23/21 24/9 25/8 26/24 30/17 30/19 31/6 33/18 35/20 39/16 39/17 40/9 40/10 42/18 43/15 43/20 45/2 45/5 45/16 50/8 50/13 51/24 52/4 52/10 53/2 53/4 54/14 57/7 57/7 57/12 57/16 57/25 58/5 58/14 62/17 64/7 65/13 67/15 68/8 68/23 72/24 75/1 76/6 77/5 77/14 78/18 78/18 79/3 79/12 79/25 80/25 81/2 89/1 89/12 89/18 89/21 90/15 91/10 91/11 93/5 94/24 94/25 95/7 97/9 98/17 102/12 103/4 105/1 106/3 106/6 108/8 109/15 109/16 109/18 115/22 116/9 116/13 116/17 120/14 121/21 121/22 127/13 129/16 131/1 131/21 133/15 133/17 136/25 138/4 138/6 138/19 138/20 141/6 141/12 143/23 145/1 146/20 147/16 149/12 150/12 151/4 151/9 151/17 154/3 154/4 155/2 156/9 156/13 158/19 159/1 159/12 160/5 160/15 160/25 161/6 161/7 162/4 162/18	theft [12] 90/21 123/5 124/13 125/10 125/14 125/17 125/19 126/9 126/14 127/3 127/4 129/13
switched [1] 10/14	talked [1] 65/11	terrified [1] 12/11	that's [149] 1/25 2/7 4/7 6/9 7/2 7/18 10/3 14/9 16/2 16/16 16/24 21/19 22/8 22/17 23/12 23/21 24/9 25/8 26/24 30/17 30/19 31/6 33/18 35/20 39/16 39/17 40/9 40/10 42/18 43/15 43/20 45/2 45/5 45/16 50/8 50/13 51/24 52/4 52/10 53/2 53/4 54/14 57/7 57/7 57/12 57/16 57/25 58/5 5	

T	156/19 157/1 159/11 159/14 159/16 159/22 161/15 162/12 163/4 164/15 165/17 166/19 167/17 168/4 168/8 168/9 168/11 168/15 168/17 168/22 170/15 174/16 174/22 175/21 175/24 176/1 176/2 176/11 176/23 176/25 176/25 181/5 181/7 181/11	155/13 155/13 155/14 155/17 157/4 159/5 159/6 159/7 160/5 162/14 163/1 163/2 163/17 163/22 163/22 163/23 164/1 164/2 164/6 166/13 166/15 166/19 167/3 167/13 167/14 168/19 168/20 169/6 169/7 169/21 169/22 169/24 169/25 171/21 171/23 176/16 176/17 179/20 180/5 180/9	138/12 138/13 139/5 139/8 140/7 142/25 145/3 147/2 147/12 148/7 149/17 156/9 157/1 159/4 159/11 160/2 161/1 161/10 162/9 163/24 164/1 164/20 165/2 165/4 166/24 172/19 172/22 176/24 179/10 181/20	47/21 48/6 48/21 66/17 67/3 69/18 79/20 86/12 87/25 93/18 94/1 94/8 94/8 96/8 96/15 115/2 118/8 122/3 126/18 134/12 147/17 148/8 149/14 154/8 156/9 161/2 161/2 167/11 169/23 176/18 180/23 180/23
then... [54] 106/24 110/18 113/8 118/19 118/19 119/5 120/1 122/19 122/24 123/7 123/7 123/10 123/22 124/9 124/15 125/17 126/11 127/23 128/5 129/8 130/20 131/24 132/6 133/10 133/19 134/17 134/23 136/9 137/7 138/7 138/21 142/21 146/11 146/14 146/23 147/5 147/23 155/15 159/5 159/6 161/13 169/11 169/13 170/19 171/13 171/24 172/14 172/16 173/25 174/2 176/3 176/19 177/25 178/4	there's [26] 3/15 14/19 15/19 20/2 20/2 55/24 58/15 86/13 86/24 87/16 96/23 114/2 122/14 150/21 151/7 151/14 151/14 152/10 162/7 165/8 165/18 166/4 173/9 173/17 174/6 177/3	thinking [2] 29/2 54/15 thinks [1] 157/10 third [7] 58/18 60/3 78/10 87/16 101/11 179/24 180/11 third-party [1] 180/11 this [381] Thomas [4] 133/14 146/13 147/16 147/20 thorough [3] 70/16 78/8 100/15 those [48] 32/22 34/19 37/8 37/12 48/2 50/18 52/18 59/10 59/13 61/7 63/3 65/12 67/7 69/6 70/16 74/19 74/21 77/22 84/21 87/2 89/4 91/22 96/13 100/11 100/17 124/23 125/3 125/22 127/1 132/12 136/11 141/13 142/1 142/20 143/5 143/5 144/20 148/13 151/1 155/5 162/13 166/12 168/10 174/9 175/10 175/14 176/21 180/25	throughout [12] 15/18 20/13 34/18 34/18 63/5 65/25 70/2 117/24 120/25 141/19 163/23 181/4 thuggery [1] 11/4 Thursday [1] 8/4 thus [1] 123/24 tied [4] 35/20 100/10 100/11 100/17 Tier [4] 157/16 159/5 159/7 175/21 Tier 2 [2] 159/5 159/7 tight [1] 3/18 time [107] 2/1 2/16 4/6 4/19 5/3 5/18 7/16 9/23 10/2 10/4 14/11 14/19 14/22 15/11 15/22 16/1 20/5 21/10 22/6 24/2 26/16 26/19 28/9 30/22 32/3 32/12 33/19 39/16 39/17 40/7 42/4 44/20 46/15 47/19 48/16 51/12 56/9 63/2 63/10 68/3 69/21 72/4 76/19 77/18 77/20 82/15 90/6 92/6 92/7 100/13 100/19 101/2 101/19 102/5 102/24 103/6 103/8 103/11 103/15 103/16 104/20 107/6 110/7 113/23 115/8 118/10 119/21 119/22 121/9 125/16 125/16 126/13 127/9 129/16 129/24 130/25 133/11 134/2 134/9 136/15 140/7 140/9 148/16 153/8 153/25 154/22 158/9 159/7 161/13 162/14 162/19 167/23 168/10 172/5 172/25 173/1 173/13 174/4 174/4 174/12 175/25 176/12 176/24 177/15 178/15 179/10 181/5	
there [174] 2/2 5/4 5/7 6/12 7/14 7/16 14/15 14/25 22/3 23/7 23/25 24/2 25/17 26/1 26/13 28/23 32/15 32/17 32/23 32/25 34/5 34/24 35/7 36/23 37/17 38/2 39/13 42/7 43/9 48/11 48/20 49/8 50/9 50/10 51/16 52/9 55/7 57/23 58/14 61/16 61/19 61/23 62/7 62/13 62/14 62/15 63/1 63/24 65/7 65/8 65/23 68/10 69/10 70/17 70/18 70/19 70/19 70/19 70/20 71/1 71/6 71/20 74/4 74/11 75/22 75/23 75/24 76/2 82/7 82/8 82/12 83/1 83/11 83/11 83/25 86/24 87/10 88/9 88/21 90/21 91/8 91/10 92/12 92/12 93/17 93/20 94/21 95/7 96/9 96/12 96/18 97/4 97/16 98/12 99/21 99/22 101/13 103/2 104/4 107/20 108/8 111/3 111/3 111/14 111/18 114/1 114/11 115/1 118/7 119/20 120/18 123/1 124/10 125/3 125/18 125/25 126/9 126/10 127/2 127/14 128/12 131/4 132/25 133/20 134/5 137/1 137/1 137/6 138/10 139/8 142/14 143/3 143/9 144/11 146/16 147/24 149/19 149/24 152/17 152/23	thereafter [1] 98/7 therefore [18] 7/9 26/8 26/22 31/4 33/1 38/20 47/16 48/14 49/3 66/25 78/7 79/1 98/2 103/17 130/21 134/13 169/5 180/3 these [30] 8/12 26/6 27/6 37/19 52/17 57/16 57/17 58/1 85/3 117/12 129/12 141/22 143/21 150/10 153/10 155/6 155/12 155/21 155/24 162/2 164/5 166/4 172/10 172/14 173/18 174/11 175/1 175/5 179/25 181/14 they [127] 9/11 12/22 21/17 22/4 23/4 23/5 25/19 26/6 35/15 35/20 36/2 37/7 38/19 46/7 46/9 47/9 47/10 51/21 54/2 54/5 54/6 54/21 55/5 55/10 55/17 57/22 60/24 60/25 61/1 67/16 68/7 68/23 69/2 78/3 78/4 78/5 78/6 78/7 78/8 79/13 80/6 80/10 81/25 81/25 82/1 84/6 88/1 88/2 88/7 89/2 89/2 89/3 89/18 89/22 99/17 107/1 108/6 110/13 110/14 124/25 125/4 127/13 132/17 138/1 138/18 141/22 143/18 143/20 149/7 149/8 149/12 149/22 149/24 149/25 150/7 150/8 150/10 150/19 150/20 151/15 152/6 152/25 153/1 153/17 154/18 155/7 155/9	they'd [8] 6/7 9/17 23/19 23/24 35/25 36/5 54/19 54/20 they'll [1] 94/18 they're [7] 96/20 150/13 152/11 152/12 165/7 169/20 169/21 they've [3] 85/1 151/2 175/6 thing [13] 11/8 12/12 14/8 23/15 24/17 75/13 77/8 136/6 136/10 137/25 150/17 162/20 173/15 things [21] 32/23 48/2 58/15 77/18 78/8 82/16 103/16 109/3 109/14 109/23 120/5 120/21 125/3 143/9 143/10 143/21 154/5 163/6 163/21 164/17 165/23 think [124] 4/5 4/10 4/13 5/12 5/17 6/2 6/7 7/15 9/6 9/8 9/11 9/15 10/2 10/3 10/5 14/14 14/15 15/5 15/13 16/15 16/18 20/10 21/21 24/22 36/16 39/3 41/2 44/2 46/12 46/19 50/1 52/17 52/20 57/7 57/12 58/13 60/9 62/8 62/12 64/6 66/11 66/15 67/11 68/9 69/6 69/10 70/2 70/3 70/3 70/14 70/20 71/15 73/8 73/12 74/13 74/24 74/24 75/2 75/10 75/13 79/25 80/12 81/16 83/11 83/19 83/22 85/15 85/16 87/23 88/1 88/6 88/9 89/21 90/10 90/19 90/20 90/20 90/21 92/7 95/7 95/11 96/15 96/22 100/1 112/4 116/11 116/14 118/16 118/21 121/17 132/19 135/21 136/2 136/9	thought [12] 15/11 15/13 31/3 34/5 39/17 40/11 78/25 81/25 88/6 132/21 135/18 161/20 thoughts [2] 50/23 53/16 thousands [3] 6/4 22/22 152/22 threat [2] 143/21 144/1 three [16] 7/5 10/11 20/20 33/2 58/15 62/12 82/7 82/9 114/15 168/17 177/11 177/12 178/12 178/15 178/15 180/1 three years [1] 114/15 through [42] 11/10 24/19 28/20 33/16 33/22 38/20 42/9 44/17 45/4 47/20	times [7] 50/22 75/14 101/3 102/6 167/24

T	training [3] 163/20 163/22 163/23 transaction [27] 37/7 37/24 38/17 39/15 41/21 43/2 51/2 51/7 51/8 51/24 52/14 52/15 57/15 57/21 57/22 57/24 58/2 58/2 93/4 114/16 115/25 116/1 116/7 116/9 132/3 135/2 145/24 transaction/acknowledgements [1] 57/24 transactional [1] 37/20 transactions [13] 37/12 39/6 42/16 45/14 50/21 51/11 51/20 51/22 52/2 56/11 115/1 115/5 147/3 transcript [1] 90/1 transfer [6] 24/5 24/12 27/14 27/14 27/17 32/7 transferred [2] 20/8 155/16 Transformation [15] 19/24 20/1 20/6 20/19 21/1 22/12 22/20 23/11 23/15 23/21 24/5 25/3 33/17 36/9 168/19 transparent [1] 119/14 traumatic [1] 160/14 trawl [1] 87/24 treatment [3] 11/15 18/7 18/24 trial [13] 90/9 92/20 100/5 125/17 135/18 138/8 138/22 139/1 139/2 139/3 143/25 149/18 162/2 trials [5] 90/8 93/16 100/11 100/17 178/22 tried [6] 8/20 20/17 20/25 33/18 33/18 176/8 trigger [1] 54/14 triggered [3] 21/23 54/4 134/20 true [16] 37/13 41/25 43/13 43/14 47/17 105/16 105/17 105/18 111/22 130/22 132/7 142/12 160/25 161/8 162/11 170/2 trust [1] 162/18 trusted [2] 99/17 99/19 truth [18] 55/15 62/6 63/6 63/8 63/12 64/23 65/4 66/24 66/25	68/22 100/22 112/15 116/5 143/13 143/16 144/4 144/19 156/10 try [18] 6/4 6/8 24/4 41/3 41/13 43/16 70/15 87/25 88/8 133/25 149/20 153/14 164/6 166/23 169/22 179/2 179/18 181/2 trying [36] 12/15 12/19 13/11 21/3 22/7 22/24 26/14 33/14 38/16 39/10 39/11 40/19 42/4 48/23 49/7 72/7 72/17 73/11 73/20 78/18 78/21 79/11 83/16 91/2 118/7 126/15 151/14 151/25 153/18 165/8 174/18 175/25 176/3 178/8 181/8 181/14 Tuesday [4] 182/4 182/5 182/6 182/9 turn [12] 28/5 50/23 60/3 60/10 63/14 80/18 81/5 81/9 90/14 110/19 122/2 143/22 turned [1] 1/16 twice [3] 85/17 116/18 158/10 two [21] 7/19 8/13 14/25 32/23 50/10 56/21 61/7 63/17 92/21 100/11 101/7 101/9 104/10 119/1 120/12 127/18 128/17 161/10 178/17 178/21 182/3 two years [1] 104/10 two's [1] 168/25 type [5] 11/8 12/12 35/6 128/7 179/7	106/22 107/3 112/2 114/2 114/22 118/7 132/3 133/18 133/18 141/1 147/8 147/18 150/4 153/1 153/14 156/7 162/6 164/4 165/6 171/15 understanding [24] 31/6 39/9 39/23 63/1 64/24 66/23 67/2 69/9 71/3 71/12 80/7 88/25 89/1 101/19 107/16 111/6 111/9 112/11 115/7 132/15 134/18 154/5 178/11 180/15 understood [8] 38/1 87/19 126/20 132/10 139/9 139/10 140/8 152/4 undertaken [3] 6/14 122/14 148/5 undertook [1] 61/1 Underwood [2] 109/21 110/21 Underwood's [1] 109/22 unfortunately [2] 142/11 166/18 unidentified [1] 122/7 unions [1] 144/13 unless [5] 30/17 44/2 81/25 161/24 172/18 unnecessarily [1] 177/20 unravelling [1] 37/21 unsafe [1] 47/3 unsavoury [2] 31/16 32/2 unset [1] 10/3 until [9] 46/13 49/11 65/6 113/5 118/10 123/6 125/11 155/15 182/8 unusual [1] 42/7 up [92] 1/16 5/20 13/3 13/13 13/19 16/3 17/17 18/1 25/19 30/1 31/17 31/25 33/18 35/10 35/11 35/20 38/15 40/24 52/9 52/16 53/7 53/17 57/2 57/11 57/23 58/10 59/1 59/1 60/4 60/10 66/8 67/12 72/11 72/24 73/1 75/1 77/2 77/10 77/14 81/15 82/23 83/1 84/13 84/21 86/6 90/14 99/18 101/4 105/10 106/7 106/10 113/21 114/9 116/18 122/2 122/9 131/24 133/13 133/16 133/20 136/13	145/13 146/11 146/14 147/5 149/19 151/2 151/6 151/16 152/13 152/20 153/4 154/14 155/15 156/2 156/12 158/8 158/19 159/25 160/5 161/6 164/24 164/24 165/7 166/1 166/6 167/3 171/24 173/3 175/7 175/11 176/2 update [3] 75/7 102/1 112/3 updated [1] 96/15 updates [2] 81/12 81/14 updating [1] 81/18 upfront [1] 90/21 upheld [1] 98/8 upon [6] 97/25 98/7 109/8 121/1 129/12 173/16 urge [1] 12/5 urgent [1] 13/20 urgently [2] 16/16 17/2 us [43] 1/15 5/8 15/10 29/17 33/4 37/18 38/1 52/19 53/23 54/5 60/4 60/9 61/3 70/9 73/2 75/10 80/11 91/12 94/10 94/15 95/1 95/12 103/12 105/9 119/22 122/6 136/25 136/25 136/25 147/4 148/19 151/3 153/18 155/4 161/15 162/6 166/15 166/16 166/20 171/15 175/25 176/4 176/8 use [13] 31/23 41/23 42/15 43/12 78/20 81/1 81/2 128/21 132/4 132/13 150/9 150/10 181/1 used [9] 47/16 48/19 80/24 91/15 128/9 130/21 132/9 137/3 146/19 useful [1] 172/3 user [5] 51/20 52/3 52/3 131/16 145/24 uses [1] 105/13 using [5] 6/7 31/16 35/9 150/16 165/25 utter [1] 92/23
			V	
			value [1] 93/3 van [64] 1/3 1/6 8/12 17/23 23/17 48/3 49/20 80/25 82/22 96/20 97/10 103/3 108/13 111/21 118/25	

V	virtually [2] 91/21 159/11	24/15 24/19 29/22 29/24 31/18 32/17 32/24 34/8 34/19 34/22 35/2 39/16 40/22 42/6 44/8 48/17 58/3 65/6 65/12 66/16 67/7 67/25 69/18 69/20 78/17 78/24 85/21 89/4 90/12 103/18 104/11 105/12 105/16 108/4 109/23 112/25 117/21 119/15 120/16 120/21 120/23 124/4 126/4 126/16 134/12 134/16 138/6 140/6 140/10 142/22 143/14 144/1 144/3 152/17 154/12 156/10 158/20 161/18 170/1 175/5 177/23 178/5 179/9 180/14 180/15 180/17 181/17	weeks [4] 10/11 95/12 95/19 131/13 well [58] 18/8 21/22 35/23 47/25 48/4 49/17 61/20 70/14 76/23 76/24 78/1 81/15 84/15 91/13 94/9 94/17 95/1 95/7 97/9 98/14 99/13 100/10 100/15 102/13 109/25 113/5 113/7 114/22 115/9 116/12 118/12 121/18 129/5 129/19 133/10 133/13 136/3 136/22 137/15 137/19 138/17 143/13 145/4 148/14 149/25 150/25 152/2 154/6 155/11 159/2 161/20 163/4 164/2 165/17 168/22 170/13 171/21 172/18	88/2 91/13 95/9 99/12 100/13 101/4 102/2 104/1 104/15 106/22 107/1 123/16 127/15 128/25 128/25 130/19 131/11 133/17 134/2 134/6 139/10 141/17 142/20 142/24 148/6 149/7 157/20 159/18 160/2 160/19 161/14 163/22 164/1 165/7 166/11 170/6 170/17 171/4 171/16 171/19 172/7 172/12 172/14 172/15 173/13 173/21 173/24 174/17 176/19 177/18 178/3 180/15 181/6
van... [49] 127/2 127/10 132/13 133/7 133/9 134/7 134/14 138/25 140/2 140/11 140/17 143/2 143/13 144/4 144/19 145/11 149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	visit [1] 151/21	watch [3] 99/11 99/12 159/18	where [39] 4/16 4/17 11/19 21/19 37/7 41/13 41/21 43/10 43/16 43/22 44/25 45/3 45/5 58/10 59/2 68/13 70/4 71/25 73/13 73/25 75/2 84/10 85/15 127/23 132/2 133/25 142/5 146/17 148/10 150/13 152/19 153/1 155/5 155/6 156/14 162/7 166/24 168/5 179/19	
133/9 134/7 134/14 138/25 140/2 140/11 140/17 143/2 143/13 144/4 144/19 145/11 149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	voice [5] 99/18 121/14 121/17 149/15 149/19	Watt [3] 140/14 140/15 183/10	whereas [4] 26/12 73/17 74/18 78/21	
144/4 144/19 145/11 149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	voicemail [8] 17/1 101/5 102/10 102/14 102/18 102/18 102/22 102/23	way [36] 19/14 21/25 22/7 22/12 23/21 23/25 24/3 31/17 35/15 35/16 36/4 41/15 44/14 48/7 54/9 64/10 64/16 69/3 69/9 77/8 77/10 79/23 80/22 87/19 99/1 100/21 108/7 109/9 117/6 122/25 134/3 134/6 152/13 160/24 162/25 167/15	whether [32] 17/15 24/7 24/10 27/23 33/22 33/23 40/4 63/7 69/10 81/3 84/4 95/13 96/12 98/7 98/17 106/17 107/11 118/7 128/4 132/23 133/2 135/10 137/16 138/2 139/6 145/23 147/11 148/6 148/11 154/1 176/8 180/5	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	volume [1] 84/4	we [351]	which [106] 4/11 6/20 6/21 8/8 8/20 8/24 9/19 13/14 15/3 19/14 20/3 20/6 21/23 25/18 25/20 27/21 28/6 28/11 29/4 29/11 32/8 33/3 35/5 36/15 37/2 38/17 40/23 41/8 45/9 45/24 46/19 50/20 56/17 59/17 59/21 59/25 60/3 60/10 62/11 62/17 64/7 64/12 64/19 64/24 69/2 69/3 69/7 71/16 72/17 73/14 78/6 79/24 80/14 81/3 81/15 85/2 85/8 86/17 88/7 91/2 91/20 91/21 94/12 97/5 98/3 98/25 99/1 101/3 101/10	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	volunteer [1] 105/22	we'd [5] 53/20 54/1 67/14 71/13 74/5	whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	volunteered [1] 71/4	we'll [7] 37/22 46/23 116/6 118/9 148/14 148/18 179/13	when [93] 10/18 14/13 15/1 20/20 25/13 30/3 32/18 33/7 34/13 36/19 38/15 41/14 42/2 43/20 43/21 46/4 46/16 46/22 47/14 50/22 53/21 54/18 56/16 62/5 62/5 64/11 64/22 66/16 67/9 70/4 70/6 70/7 73/14 73/25 74/22 77/2 79/10 79/23 79/25 81/15	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	W	we're [17] 17/16 18/1 46/11 77/8 78/18 78/25 78/25 107/19 117/17 132/25 136/18 147/22 164/25 166/6 174/7 176/24 181/14	whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	wait [3] 30/12 37/20 40/1	we've [15] 18/1 32/20 44/1 45/10 50/25 57/16 57/25 61/7 75/11 77/7 108/18 118/16 145/18 150/15 160/3	whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	waiting [2] 12/4 101/25	wearing [1] 8/14	whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	waiver [1] 26/22	week [6] 3/12 4/2 5/2 11/23 74/8 112/5	whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	walked [5] 10/23 11/25 14/18 14/23 15/19	weekly [3] 92/7 144/15 173/5	whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	walking [1] 32/25		whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	Wallis [1] 144/16		whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	want [14] 1/14 2/17 8/1 10/17 41/14 43/23 54/2 107/3 120/3 132/9 134/2 145/13 145/15 164/12		whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	wanted [38] 17/6 21/17 22/2 24/7 24/10 24/17 30/12 32/8 33/22 33/23 34/10 35/1 36/2 36/2 39/4 39/23 40/24 55/1 55/14 61/15 61/23 63/25 70/14 76/13 79/12 80/7 106/22 112/2 112/3 125/2 125/2 129/2 140/19 156/3 156/23 173/25 174/21 176/10		whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	wants [1] 157/16		whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	Ward [1] 56/17		whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	Warmington [21] 36/23 39/13 49/1 50/1 50/12 51/13 52/11 52/16 52/24 56/2 63/17 86/3 86/10 87/1 88/16 90/2 90/11 90/17 90/25 94/3 96/6		whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	Warmington's [2] 50/13 86/8		whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	Warnborough [1] 122/5		whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	warning [4] 96/24 97/6 97/11 177/2		whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	warnings [1] 12/17		whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	was [755]		whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	
149/2 151/10 151/23 151/25 152/14 154/15 155/7 158/22 160/2 161/1 161/4 161/8 161/25 162/8 163/10 164/10 165/16 165/23 166/13 166/23 174/3 174/10 174/16 175/8 175/19 176/13 178/6 180/13 180/20 181/3 181/15 182/1 183/2	wasn't [76] 4/19 5/3 9/9 17/12 20/23 22/1 22/11 23/9 23/19		whenever [7] 17/20 29/6 60/25 63/6 110/6 127/12 149/21	

W	wilful [1] 143/14	won't [1] 126/8	112/19	173/2 173/2 173/3
which... [37] 101/14	wilfully [1] 134/14	wonderful [1] 165/1	wrongly [4] 87/10	173/4 173/6 173/23
101/21 105/22 106/24	will [36] 7/1 13/2	wonders [1] 11/17	89/10 114/18 119/12	175/18
109/9 110/13 111/6	19/17 26/22 28/18	word [1] 23/12	wrongs [1] 33/12	your [101] 1/15 1/17
114/17 115/25 116/10	29/10 46/19 50/18	wording [2] 108/5	wrote [6] 5/11 17/11	2/25 6/16 7/10 7/13
116/10 119/18 122/21	50/20 52/18 72/12	154/11	18/3 46/15 113/19	15/21 19/17 21/25
123/14 123/24 131/20	88/1 94/10 95/1 98/6	words [9] 17/20	113/23	25/12 26/23 27/2 27/3
132/18 136/13 137/6	98/17 99/1 101/9	125/22 129/12 132/12	Wyn [1] 116/10	27/5 27/20 27/22
142/15 145/14 147/24	101/9 108/18 117/13	150/19 156/6 159/24		40/11 45/7 47/15
150/6 153/3 153/22	120/2 120/7 125/21	167/18 168/12	Y	47/24 53/10 53/16
156/13 156/17 170/15	136/21 136/21 136/22	work [9] 5/24 8/18	yeah [9] 29/1 29/7	54/13 60/4 60/9 60/10
172/5 172/8 172/20	143/4 148/19 165/2	11/24 18/16 89/2	31/8 83/17 89/13	60/13 61/18 62/1
173/16 174/5 175/12	178/1 179/20 180/1	118/6 120/3 132/11	120/24 125/13 138/15	63/11 70/9 72/18
176/8 179/12 180/8	180/4 180/5 180/9	180/24	159/13	76/25 78/22 80/5
While [1] 116/17	Williams [5] 28/7	worked [5] 42/7	year [15] 6/24 7/7	85/19 97/25 98/7 98/7
whilst [6] 1/12 9/25	29/18 31/2 53/9 84/22	91/17 113/4 152/24	17/10 18/2 18/8 18/12	98/15 99/11 99/18
47/3 47/7 55/2 85/21	Wilson [1] 153/12	177/5	18/23 19/14 49/20	100/6 102/9 102/17
Whitehouse [2]	Winchester [1] 123/1	working [41] 3/3	71/13 72/23 140/25	105/1 106/9 106/10
92/14 92/15	Winn [13] 38/25 39/1	14/10 15/10 21/19	163/9 168/25 172/8	107/15 108/3 109/20
Whitehouse's [1]	56/16 56/23 57/7	34/14 57/4 60/5 60/13	years [24] 2/2 3/4 3/7	111/4 111/9 111/21
92/15	57/12 58/13 58/16	65/16 65/18 66/5 66/6	3/9 3/18 13/3 40/3	113/19 114/8 114/10
who [52] 5/17 11/14	106/5 106/6 106/8	66/17 69/19 70/18	46/13 61/21 84/18	120/4 120/8 121/14
22/17 25/9 26/2 30/24	106/11 110/19	72/13 72/16 76/23	91/17 104/10 112/12	121/22 123/9 124/23
37/5 37/19 51/1 51/6	Winn-Alan [1] 56/16	76/24 78/4 79/15	113/5 114/15 144/4	125/8 126/2 127/5
51/7 53/25 55/6 55/21	Winn-Lusher [9]	79/19 79/22 79/23	150/23 152/17 152/25	127/25 130/5 130/20
55/25 60/15 75/17	56/23 57/7 57/12	80/22 81/10 82/4	154/5 160/11 166/4	132/23 133/2 133/18
75/19 75/20 77/24	58/16 106/5 106/6	86/16 96/8 96/16	168/1 168/3	140/19 140/20 142/13
78/17 79/5 79/7 82/2	106/8 106/11 110/19	110/1 122/5 125/21	yes [235]	143/2 147/8 147/13
98/2 98/12 107/20	winning [1] 179/23	141/17 144/14 147/1	yesterday [28] 1/8	148/3 149/15 149/19
119/4 119/20 120/12	wish [9] 27/4 27/14	149/4 166/3 173/15	18/5 19/2 56/22 59/5	151/2 153/5 154/21
129/25 133/4 136/11	40/13 97/25 98/4	174/9 175/13	59/13 61/20 66/15	154/22 154/23 159/5
140/13 143/4 143/5	98/15 134/16 164/16	workload [1] 18/18	83/6 101/3 105/24	160/16 160/23 162/18
143/5 144/6 144/16	180/6	works [1] 87/20	115/14 116/18 117/20	163/9 163/13 165/8
149/12 151/13 153/10	wished [1] 80/16	worried [4] 100/20	120/9 128/22 130/14	166/22 170/5 170/21
155/18 166/5 166/25	wishes [2] 13/2	143/18 180/21 181/13	135/24 136/2 142/9	171/9 172/10 177/22
167/3 167/20 168/2	34/11	worries [1] 180/25	142/13 152/4 153/5	180/18 181/15
171/24 180/4 180/6	wishing [2] 81/4	worry [2] 3/15 166/1	153/9 154/7 172/20	yours [1] 3/3
181/24	129/19	worrying [2] 173/14	180/18 181/5	yourself [2] 78/21
who's [1] 13/11	withdrawal [2] 28/3	173/19	yet [5] 77/8 91/1	162/20
whoever [4] 43/3	34/25	wise [1] 169/5	93/17 127/3 152/11	
81/23 82/8 167/22	withdrawing [2]	would [205]	you [714]	
whole [6] 39/10 79/8	23/18 72/13	wouldn't [19] 2/16	you'd [3] 53/9 81/2	
88/10 90/18 101/20	withdrawn [1] 24/15	33/8 39/7 48/5 49/8	110/9	
137/25	within [28] 10/17	55/7 65/8 71/4 71/4	you'll [3] 100/21	
wholly [1] 18/10	16/9 19/12 27/21	112/10 117/16 135/4	156/19 157/1	
whose [1] 179/22	42/10 56/14 59/6	137/15 137/21 137/25	you're [35] 15/5 20/4	
why [41] 5/8 12/14	60/13 62/8 67/3 67/23	141/14 142/3 167/8	26/1 40/7 41/6 50/4	
12/16 15/3 15/17 17/3	75/7 76/20 89/6 109/5	169/15	54/11 57/24 68/4	
20/14 26/10 26/15	132/18 132/21 149/5	wriggling [1] 117/5	84/14 94/1 100/10	
35/14 35/17 35/18	151/8 152/4 155/8	write [1] 5/21	101/14 104/14 105/7	
35/22 39/1 39/22 59/3	164/20 167/20 172/9	writes [1] 3/5	107/13 110/21 117/22	
78/18 79/4 79/12 88/3	172/9 176/1 177/8	writing [4] 11/13 19/2	121/14 128/3 128/6	
88/7 88/19 92/13	177/21	19/18 109/14	133/3 150/16 151/7	
93/10 93/11 94/25	without [10] 12/18	written [9] 30/7 32/20	151/16 151/22 151/25	
99/22 111/6 137/13	18/15 34/1 49/18	32/21 71/6 77/6 88/22	153/14 153/18 166/2	
138/6 139/12 139/23	56/18 114/4 128/13	122/20 158/11 179/15	171/15 172/5 174/11	
143/24 144/4 161/7	129/19 169/25 179/24	wrong [15] 71/1	176/3 180/18	
173/25 174/20 174/20	WITN09900100 [1]	90/21 91/5 99/7	you've [27] 38/2	
177/18 177/23 178/13	170/22	111/11 115/13 115/16	38/14 50/18 61/3 70/9	
widely [1] 53/15	witness [9] 1/15 60/5	127/16 138/10 138/17	90/10 99/22 105/23	
widow [3] 20/16	60/10 96/1 97/14	144/11 149/10 158/15	108/10 108/24 126/18	
24/24 31/24	97/17 140/20 162/19	159/1 165/8	128/3 146/13 151/6	
wife [2] 14/3 21/9	182/2	wrongdoing [1] 19/6	152/3 152/12 155/4	
	witnesses [1] 178/7	wrongful [2] 3/9	163/19 164/10 164/25	