

Thursday, 20 June 2024

1  
2 (9.45 am)  
3 **MR BEER:** Good morning, sir, can you see and hear us?  
4 **SIR WYN WILLIAMS:** Yes, thank you very much.  
5 **MR BEER:** Can I check that Mr Ward can see and hear us?  
6 **THE WITNESS:** I can, yes.  
7 **MR BEER:** Thank you very much. May I recall Graham Ward, he  
8 needs to be resworn, please.  
9 **SIR WYN WILLIAMS:** Yes.  
10 **GRAHAM WARD (re-sworn)**  
11 **Questioned by MR BEER**  
12 **SIR WYN WILLIAMS:** Mr Ward, you may recall that, before you  
13 gave evidence on the last occasion, I gave you what I'll  
14 call a direction about answering questions which the  
15 answers to which might incriminate you. Do you remember  
16 you doing that?  
17 **A.** I recall that, yes.  
18 **SIR WYN WILLIAMS:** Since a number of months have gone by,  
19 I think it's appropriate that I remind you of that  
20 before you answer questions this morning, all right. So  
21 it will be in very similar terms, if not identical, to  
22 the direction I gave you on the previous occasion when  
23 you gave evidence. So, under our law, a witness at  
24 a public inquiry has the right to decline to answer  
25 a question put to him by any lawyer at the Inquiry, or,

1

1 **A.** Yes, sir, I understand.  
2 **SIR WYN WILLIAMS:** Thank you. Over to you, Mr Beer.  
3 **MR BEER:** Thank you.  
4 Good morning, Mr Ward.  
5 **A.** Good morning.  
6 **Q.** You gave evidence on 1 February 2024, and I want to ask  
7 you some questions today about a single issue, namely  
8 your involvement in changes made to Gareth Jenkins'  
9 witness statement in the case of Noel Thomas; do you  
10 understand?  
11 **A.** Yes, I do.  
12 **Q.** You gave evidence about that issue on 1 February 2024.  
13 The Inquiry is now in possession of material with which  
14 we can further explore that issue. Can I recap in  
15 general terms of where we were when you gave evidence on  
16 the last occasion. We're dealing with events in 2006,  
17 where you were the assistant Casework Manager in the  
18 Security team; is that right?  
19 **A.** I think in 2006 I was the Casework Manager.  
20 **Q.** Okay. That was a position you'd held since 2002?  
21 **A.** Correct.  
22 **Q.** You told us on the last occasion that you were the  
23 Casework Manager for the case of Noel Thomas and,  
24 therefore, acted as the single point of contact between  
25 the Post Office and Fujitsu in relation to Litigation

3

1 for that matter, by anyone else, if there is a risk that  
2 the answer to that question would incriminate the  
3 witness. This legal principle is known in shorthand  
4 form as the privilege against self-incrimination.  
5 I remind you that it is for you to make it clear to me  
6 in respect of any question put to you if you wish to  
7 rely upon the privilege against self-incrimination. So  
8 if any questions are put to you by any of the lawyers  
9 who ask you questions, or by me, which you do not wish  
10 to answer on the ground that to answer might incriminate  
11 you, you must tell me immediately after any such  
12 question is put to you. At that point I will consider  
13 your objection to answering the question and,  
14 thereafter, rule upon whether your objection should be  
15 upheld.  
16 Now, you're giving evidence remotely this morning.  
17 Do you have the facility to take legal advice from  
18 anyone should this issue arise.  
19 **A.** Yes, I have, yes.  
20 **SIR WYN WILLIAMS:** Fine. So should this issue arise and  
21 should you wish to speak to the legal person who is  
22 assisting you, you must tell me and then I will consider  
23 whether that is appropriate, all right?  
24 **A.** Okay.  
25 **SIR WYN WILLIAMS:** So do you understand all that, Mr Ward?

2

1 Support in that case.  
2 **A.** That's correct.  
3 **Q.** On the last occasion, we dealt with proposed changes and  
4 changes made to a witness statement prepared by Gareth  
5 Jenkins for the purpose of the prosecution of Noel  
6 Thomas.  
7 **A.** That's correct.  
8 **Q.** Now, before I ask my questions of you, I think it's fair  
9 to remind you of what you said on the last occasion  
10 about this topic. Now, that's going to involve reading  
11 a very significant part of the transcript of your  
12 evidence on the last occasion but it's important that  
13 I put the questions that I'm about to ask you in the  
14 context of that evidence, so that you can see and hear  
15 what you said on the last occasion, okay?  
16 **A.** Okay.  
17 **Q.** Can we look, please, at the transcript. It's  
18 INQ00001124. We can see, at the top left-hand side, if  
19 we can just scroll in on -- zoom in on that, rather.  
20 It's Thursday, 1 February 2024, and you gave evidence  
21 and you swore an oath like you have on this occasion.  
22 **A.** Okay.  
23 **Q.** Can we go forward to page 40, please, and can we look in  
24 the bottom right-hand corner, please, at internal  
25 pagination 160, and scroll down once more. Thank you.

4

1 This is partly picking it up mid-way through the topic,  
 2 or partway through the topic, but I had to pick  
 3 somewhere to start and this is a good place. It's  
 4 a gentle run in to the questions that matter. I'll read  
 5 it. It's me speaking, page 160, line 2:  
 6 "We're now in March 2006 and you're emailing the  
 7 Fujitsu email account in relation to a range of cases,  
 8 'ARQs, statement request and assistance', and you speak  
 9 about two attached files:  
 10 "Both of the above requests relate to cases where  
 11 the Post Office are being challenged about the accuracy  
 12 ...'  
 13 "You deal with Marine Drive and Torquay [Drive]  
 14 next, further down, if we scroll on, please. Then at  
 15 the bottom of the page, you say:  
 16 "On a separate matter, I also require a witness  
 17 statement in [relation] to the following ARQs', and then  
 18 there's one of the ones we've seen already, 401.  
 19 "Answer: Yes.  
 20 "Question: There's also 459 and 460, all of which  
 21 relate to Mr Thomas' branch:  
 22 "We need the usual (leave out paragraphs H(b) and J  
 23 but we do need K) covering an analysis over the period  
 24 01/11/04 to 30/11/05. Penny -- you may recall this one  
 25 relates to nil transactions, my previous emails ...

5

1 "... please see extract from a recent email below  
 2 in italics from Graham Ward ...'  
 3 "Then he extracts your email of 10 March that we  
 4 looked at a moment ago:  
 5 "... regarding providing a statement about nil  
 6 transactions and online banking. If you're able to put  
 7 something together for us, I'd be grateful. If you send  
 8 it back I'll arrange for Neneh or Penny to write into  
 9 a statement for your signature.'  
 10 "Then he cuts in what you had said in your 10 March  
 11 email; can you see that?"  
 12 "Answer: Yeah."  
 13 "Question: The important part is in bold in  
 14 italics:  
 15 "Can you add an extra paragraph in your statement  
 16 explaining how online banking transactions are processed  
 17 and the data downloaded and how nil transactions can  
 18 occur.'  
 19 "So this is Mr Pinder asking Mr Jenkins to put  
 20 something together for him or for us, for Fujitsu, in  
 21 order to address that issue. If we go up to page 1,  
 22 please, scroll down, please, we can see Mr Jenkins'  
 23 reply:  
 24 "I've had a look at the ARQs and I think there is  
 25 sufficient info there to explain in most cases why there

7

1 refer. Can you add an extra paragraph in your statement  
 2 explaining how online banking transactions are processed  
 3 and the data downloaded and how nil transactions can  
 4 occur?"  
 5 Then over the page, page 161:  
 6 "So five or six months has now passed and you're now  
 7 asking for a witness statement to address the things  
 8 that had been mentioned in the three emails that you  
 9 refer to there it; is that right?  
 10 "Answer: Sounds like it, yeah.  
 11 "Question: Can we go to FUJ00152582. Look at  
 12 page 3, please. This is 11 days later, you emailing  
 13 Penny Thomas about Mr Thomas' branch:  
 14 "These are the nil transactions you sent us and  
 15 will need to be produced and explained within your  
 16 (Brian's) statement.'  
 17 "You attach the 401 analysis and then the ARQ data  
 18 under the numbers 459 and 460, by which you have now got  
 19 these, yes?  
 20 "Answer: Yes.  
 21 "Question: If we go down to page 2 please. We can  
 22 see that, if we scroll down a little bit, in an email  
 23 that you wouldn't have known about at the time, Brian  
 24 Pinder of Fujitsu is forwarding that email to Gareth  
 25 Jenkins:

6

1 are zero ... transactions. I suggest the [that should  
 2 probably be 'following') as a brief explanation.  
 3 "Three main reasons why zero transactions maybe  
 4 generated as part of the banking system.  
 5 "No financial effect;  
 6 "Declined by bank; or  
 7 "There has been some sort of system failure.'  
 8 "He gives some examples:  
 9 "How do you want to play this? Do you want to add  
 10 in specific text to the witness statement to cover these  
 11 two codes or persuade [Post Office] that the generic  
 12 statement is okay perhaps with some clearer words?'  
 13 "Further up the page, please. She -- that's Neneh  
 14 Lowther -- says that she's updated your witness  
 15 statement -- Mr Jenkins' witness statement. She's not  
 16 included the response below because she's not sure how  
 17 to fit it in. Could you help:  
 18 "Also I believe that Graham Ward is thinking that  
 19 'system failures' are drastic events.'  
 20 "Is that true?  
 21 "Answer: Well, I just wanted them explained. I  
 22 didn't know whether they were drastic or not. It's just  
 23 from -- you know, and it's going back such a long, it's  
 24 so hard to sort of recall what I was thinking, but I'm  
 25 guessing that the first statement wasn't clear to me at

8

1 that time so I just wanted a bit more context around  
 2 what he meant by system failures.  
 3 **"Question:** Then scroll up, please. Mr Jenkins says  
 4 he's annotated it with revisions and doesn't feel able  
 5 to include the last two paragraphs which may make the  
 6 statement useless.  
 7 "Can we now look, please, at the draft that he had  
 8 previously provided. Can we start, please, with  
 9 FUJ00122204. Can we scroll down please. He says:  
 10 "There are three main reasons why a zero value  
 11 transaction may be generated ...'  
 12 "System failure is the third of them:  
 13 "Such failures are normal occurrences.'  
 14 "He then sets out in summary terms in substance the  
 15 same thing in the email we looked at, about response  
 16 codes; can you see that?  
 17 **"Answer:** Yeah. Yes, I can, yeah.  
 18 **"Question:** Would you agree that this is important  
 19 information that a zero value transaction may be shown  
 20 or may be generated, including by reason of a system  
 21 failure --  
 22 **"Answer:** Yes. It is important, yeah.  
 23 **"Question:** -- and that he is saying that such  
 24 failures are normal occurrences --  
 25 **"Answer:** Yeah.

9

1 **"Question:** You remember he said he didn't feel he  
 2 was able to include those --  
 3 **"Answer:** Yes, I do, yeah.  
 4 **"Question:** -- and that they may make the statement  
 5 useless?  
 6 **"Answer:** Yes.  
 7 **"Question:** What did you think the purpose of the  
 8 inclusion of those two paragraphs was?  
 9 **"Answer:** Well, these were two general paragraphs  
 10 that the Criminal Law Team had asked to be included on  
 11 statements that produced computer evidence. So it was,  
 12 to my mind, important to have them in there to say that  
 13 the system was operating properly and didn't affect the  
 14 information held on it."  
 15 **"Question:** What did you take from the fact that he  
 16 thought that these bits, which I think on the original  
 17 were highlighted in yellow weren't true, or he wasn't  
 18 sure were true?  
 19 **"Answer:** Well, that would have been a concern,  
 20 obviously.  
 21 **"Question:** Sorry?  
 22 **"Answer:** That would have been a huge concern, if  
 23 he --  
 24 **"Question:** Why would it have been a huge concern?  
 25 **"Answer:** Because if he can't say that the system is

11

1 **"Question:** -- and he's saying that there's a system  
 2 code that may identify them?  
 3 **"Answer:** Yeah, I don't know that I was tying in the  
 4 paragraphs beneath that with system failures. Maybe  
 5 that's just my ignorance of not knowing exactly what nil  
 6 transactions were.  
 7 **"Question:** Doesn't this explain it? His numbered  
 8 paragraph 3, some sort of system failure is linked to  
 9 the third bullet [attached] to this email?"  
 10 **"Answer:** I would like to think ..."  
 11 Sorry, if we just go back, please, to the previous  
 12 page:  
 13 "... linked to the third bullet at the bottom of  
 14 this page: response code with a value greater than 10  
 15 implies some sort of system failure.  
 16 **"Answer:** Yeah --  
 17 **"Question:** They're speaking about the same thing,  
 18 aren't they?  
 19 **"Answer:** Yeah, I can see that now, yeah.  
 20 **"Question:** Then if we go forward to page 3, please  
 21 those last two paragraphs, can you see the one beginning  
 22 'No reason to believe that' and --  
 23 **"Answer:** Yeah.  
 24 **"Question:** -- 'any records to which I refer'?  
 25 **"Answer:** Yeah.

10

1 operating properly, then, you know, there's a problem  
 2 isn't there? If this -- this wasn't the final statement  
 3 was it?  
 4 **"Question:** No.  
 5 **"Answer:** Oh, right.  
 6 **"Question:** What we'll see happens is that he  
 7 requests for them to be removed. They are removed and  
 8 then, in the end draft, they come back in.  
 9 **"Answer:** What the statement that was produced in  
 10 evidence?  
 11 **"Question:** Yes.  
 12 **"Answer:** I don't know anything about that.  
 13 **"Question:** He says:  
 14 "'Can this be deleted? All I've done is interpret  
 15 the data ...'  
 16 **"Answer:** Yeah.  
 17 **"Question:** '... in the spreadsheets you've emailed  
 18 to me.'  
 19 "Would you have read this at the time, ie the  
 20 attachment to this email?  
 21 **"Answer:** I would like to think I would, yeah.  
 22 **"Question:** This being the attachment to the email  
 23 you got?  
 24 **"Answer:** Yeah, I would have thought so, yeah.  
 25 **"Question:** Do you understand these or did you

12

1 understand these two paragraphs to be statements  
 2 speaking to the accuracy and reliability of Horizon  
 3 generally or about a system that had been used to  
 4 extract ARQ data?  
 5 **"Answer:** Horizon generally.  
 6 **"Question:** Hence your belief that these were  
 7 significant omissions --  
 8 **"Answer:** Yeah.  
 9 **"Question:** -- or they would have been significant  
 10 omissions?  
 11 **"Answer:** Yeah.  
 12 **"Question:** Can we look, please, at FUJ00122210. If  
 13 we scroll down, on the 24th, ie the next day -- sorry,  
 14 scroll up, please:  
 15 ""This statement needs more work ...'  
 16 "You're emailing Neneh Lowther, Brian Pinder, Keith  
 17 Baines, Paul Dawkins and Diane Matthews:  
 18 ""This statement needs more work. I've attached  
 19 a suggested draft with a number of comments (as  
 20 mentioned previously I think the "system failure normal  
 21 occurrence" line is potentially very damaging).'  
 22 "Firstly, why did you think the 'system failure  
 23 normal occurrence' line was potentially very damaging?  
 24 **"Answer:** Well, just for the reason that I've said  
 25 previously. I think I was just looking for a little

13

1 **"Question:** That's not how it reads, is it?  
 2 **"Answer:** No, it's not.  
 3 **"Question:** You've gone straight to the effect of  
 4 what he says, ie it causes us, the Post Office, damage.  
 5 **"Answer:** Yeah, I can see how it looks now.  
 6 **"Question:** Again, is this one of those examples of  
 7 the way that you were thinking at the time: the  
 8 importance thing is to maintain, even in our  
 9 prosecutions, the line that Horizon has integrity and  
 10 produces reliable data?  
 11 **"Answer:** I wasn't trying to do that, no. I just  
 12 obviously had a closed mind to the way I put things  
 13 across but I really wasn't trying to -- you know, at the  
 14 end of the day, the truth is more important, and --  
 15 **"Question:** We don't see that kind of sentiment in  
 16 any of your email exchanges, do we?  
 17 **"Answer:** Well, no, maybe not, but I know the person  
 18 that I am.  
 19 **"Question:** I think we can delete 'maybe' from that  
 20 sentence and replace it with 'definitely'.  
 21 **"Answer:** Okay.  
 22 **"Question:** Can we look, please, at POL00047895.  
 23 This is a copy of the marked-up witness statement,  
 24 marked up by you, forwarded by Ms Lowther to Mr Jenkins.  
 25 If we scroll down, please, and we keep reading -- sorry,

15

1 bit -- it just wasn't clear to me exactly what he meant  
 2 by it and that may just be my ignorance of not knowing  
 3 about banking transactions and nil transactions but, you  
 4 know, I'm just offering a comment. I'm not trying to  
 5 lead him into saying anything in his statement, or  
 6 anything like that, I was trying to be helpful but  
 7 clearly I wasn't being. As I say, I can see here it  
 8 says it may be worth someone from our team taking  
 9 a statement directly from him.  
 10 **"Question:** Why did you think that was a good idea?  
 11 **"Answer:** I just thought it was getting a bit  
 12 confusing with his statement and I just thought maybe it  
 13 would be best for the Investigator dealing with the  
 14 investigation to actually, you know, deal with it  
 15 themselves.  
 16 **"Question:** Why would you be concerned if a person  
 17 with expertise from Fujitsu is giving technical  
 18 evidence, the effect of which was damaging? Wouldn't  
 19 you be pleased with that, as an Investigator or somebody  
 20 associated with an investigation, the true position was  
 21 being revealed?  
 22 **"Answer:** Well, yeah, when you word it like that,  
 23 yes, and I really wasn't trying to alter his statement  
 24 or make him say anything; I was just wanting, you know,  
 25 clarity on what he meant by 'system failures'.

14

1 if we just go back to the top, please. Then scroll down  
 2 slowly, please.  
 3 Remaining in the statement, in the second paragraph,  
 4 second line:  
 5 ""I was asked to produce information relating to  
 6 "nil" transactions'.  
 7 "Then if we go to the second page, please. Then the  
 8 paragraph beginning 'There are three', we see your  
 9 comments:  
 10 ""There are three ...'  
 11 "Then you've added:  
 12 ""If these are the main three reasons, what are the  
 13 rest?'.  
 14 "That's in the nature of a question both in terms of  
 15 the words used and the used of the question mark. So  
 16 that's clarificatory, isn't it?  
 17 **"Answer:** Yeah.  
 18 **"Question:** Yes?  
 19 **"Answer:** Yes, sorry.  
 20 **"Question:** So you're genuinely trying to find  
 21 something out, by the look of it there --  
 22 **"Answer:** Yeah.  
 23 **"Question:** -- why a zero transaction may be  
 24 generated as part of the banking system. Then we see  
 25 Mr Jenkins' own words:

16

1 "Transaction has no financial effect. Transaction  
2 has been declined by the bank.'  
3 "Then we see system failure reason missing, don't  
4 we; you've delete it, haven't you?  
5 **"Answer:** No, I would not have deleted anything at  
6 all.  
7 **"Question:** Well, why doesn't it appear here?  
8 **"Answer:** I don't know.  
9 **"Question:** You've typed over it:  
10 "This is a really poor choice of words which seems  
11 to accept that failures in the system are normal and  
12 therefore may well support the postmaster's claim that  
13 the system is to blame for losses!!!!'  
14 **"Answer:** No, I would not have typed over anything  
15 or deleted anything at all. I just know the person that  
16 I am and I wouldn't have done that.  
17 **"Question:** Well, you were concerned, we've seen, at  
18 the emails that preceded this, with what Mr Jenkins was  
19 proposing to say about system failures, weren't you?  
20 **"Answer:** Yeah, I was concerned, yeah. I just  
21 wanted clarity on it, as I said, but I would not have  
22 typed over or deleted it.  
23 **"Question:** This is the attachment to an email that  
24 you sent to Neneh Lowther, who, in turn send it on to  
25 Mr Jenkins?

17

1 involved in an important statement in relation to the  
2 prosecution of someone in a way that you'd ever done  
3 before, as I've understood it. So can you try and rack  
4 your memory, please, as to how this statement came to be  
5 attached to an email you sent.  
6 **"Answer:** Honestly, I just can't explain it at all,  
7 no. I really can't."  
8 We can take that transcript down. That's where the  
9 relevant exchanges end. So that's the entirety of the  
10 evidence that you gave on the last occasion about the  
11 issue of suggesting changes or actually making changes  
12 to the witness statement of Gareth Jenkins in the case  
13 of the prosecution of Noel Thomas.  
14 Mr Ward, do you accept that, on the last occasion,  
15 you, firstly, agreed that you sent an email on 24 March  
16 2006 to Fujitsu that had, as an attachment to it,  
17 a marked-up copy of Gareth Jenkins' witness statement?  
18 **A.** Yes, I do, yeah.  
19 **Q.** Do you agree that, on the last occasion, you denied  
20 deleting or typing over the "system failure" reason, the  
21 third reason for nil transactions that Mr Jenkins had  
22 given?  
23 **A.** Yeah.  
24 **Q.** Do you agree that, on the last occasion, you said that  
25 you didn't know why that line had disappeared from the

19

1 **"Answer:** Right.  
2 **"Question:** Do you know where these words have come  
3 from, then?  
4 **"Answer:** Well, I'm sure I've -- I must have typed  
5 the words, yeah. But I wouldn't have typed over 'system  
6 failure'.  
7 **"Question:** Okay, if we move on. Next page, please.  
8 We see that the paragraphs that were previously in  
9 yellow, which Mr Jenkins said he didn't feel he could  
10 say, have been deleted. Did you delete those then?  
11 **"Answer:** No. I can't explain it at all. I would  
12 not have written over or deleted anything from anybody's  
13 statement. Absolutely not.  
14 **"Question:** Can we move to FUJ00122217."  
15 Then the Chairman intervenes:  
16 "Well, before we do, since I think you've just  
17 accepted that you attached this witness statement to  
18 an email you sent, can you explain where there is  
19 witness statement came from, so as to enable you to  
20 attach it to an email?"  
21 **"Answer:** No, I'm sorry, sir. I just cannot  
22 remember, you know, this at all.  
23 "The Chairman: Well, people's memory, of course, is  
24 for them to tell me about, but this is a pretty  
25 memorable event, is it not? This is you really becoming

18

1 draft witness statement but that you knew that it wasn't  
2 you that had deleted it because that just wasn't you?  
3 **A.** Yes, I agree.  
4 **Q.** Now, the Inquiry is in possession of material that may  
5 assist us in where the truth lies here and I want to  
6 show you that material in a moment. Can we start,  
7 please, however, with what I showed you on the last  
8 occasion, the email. FUJ00122210. Thank you.  
9 If we scroll down, please -- thank you.  
10 So this is your email of 24 March 2006 at 11.37 in  
11 the morning. So this is exactly the same one, exactly  
12 the same copy that I showed you on the last occasion?  
13 **A.** Okay.  
14 **Q.** Now, if we just read the two paragraphs of the witness  
15 statement:  
16 "This statement [Mr Jenkins' statement] needs more  
17 work ... I've attached a suggested draft with a number  
18 of comments (as previously mentioned I think the 'system  
19 failure ... normal occurrence' line is potentially very  
20 damaging). It may be worth considering someone from our  
21 team taking a statement directly from Gareth Jenkins  
22 (where is he based?)  
23 "Whilst there is some urgency with this, it is more  
24 important to get it right and ensure we are not  
25 embarrassed at court, which we certainly could be if we

20

1 produced a statement accepting 'system failures are  
2 normal occurrences'."

3 Then the attached file, which you can see described  
4 there, and then:

5 "Let me know what you think of the draft."

6 If we just scroll up, please, we can see Neneh  
7 Lowther forwards that email on to Gareth Jenkins  
8 directly, with the attachment that you had included,  
9 yes?

10 **A.** Yes.

11 **Q.** Now, on the last occasion, we looked at that attachment  
12 as a separate document. I then went to another  
13 document, I gave it the name POL00047895, another  
14 version of it is FUJ00122211 -- neither of those need be  
15 displayed at the moment -- and we looked at that in  
16 an imaged copy, which is what this is here, it's  
17 an image of an email?

18 Can we now, please, switch on our system at this end  
19 to the original of this email.

20 We've got the original email. Can you see that on  
21 your screen?

22 **A.** Yes, I can, yeah.

23 **Q.** Can you see the email that we've just looked at, at the  
24 foot of the page there, that's being displayed,  
25 24 March, 11.37: exactly the same email. Yes?

21

1 amendment and the time at which they made it and the  
2 date on which they made it, yes; can you see that?

3 **A.** Yes, I can.

4 **Q.** So, looking here -- that's it, if we hover above that  
5 one -- we can see that that first amendment was made at  
6 10.28 in the morning on 24 March 2006 and, would this be  
7 right, by you? Nobody else that access to your account?

8 **A.** No, that would be me.

9 **Q.** Then the third thing we can see is, on the right-hand  
10 side, if there are any formatting changes, those appear  
11 in comment boxes on the right-hand side, yes?

12 **A.** Yes.

13 **Q.** Now, we can see, if we hovered above each amendment and  
14 wrote down the times of them, take it from me the first  
15 amendment was made at 10.21 in the morning, I think that  
16 was the first one we were actually hovering over  
17 there -- that's it -- at 10.21, and the last amendment,  
18 if we hovered over it, was made at 11.13 am, so over the  
19 course of 52 minutes.

20 If we just scroll down and hover again over each  
21 amendment, we can see that they're all made by you.  
22 Okay?

23 **A.** Yeah.

24 **Q.** If we scroll to the second page and just pick any  
25 amendment, please, operator, at random, and then the one

23

1 **A.** Yes, I can, yeah.

2 **Q.** We can see Neneh Lowther forwarding it at the top, just  
3 as we've seen in the image of this email that we've  
4 looked at. But, on this occasion, we can actually see  
5 the attachment in the email, can't we --

6 **A.** Yes, we can, yeah.

7 **Q.** -- just like when you're sitting at your computer?

8 **A.** Yes.

9 **Q.** This is a more conventional format of an email which is  
10 attaching a Word document and the difference is we can  
11 now open the email attachment. So let's open that.  
12 Thank you.

13 If we just scroll down to look at it. Thank you.

14 I think this will be the more conventional format of  
15 a Word document that you, in your working life, would  
16 have been used to seeing; would that be right?

17 **A.** Yes, it would, yeah.

18 **Q.** Where amendments have been made to a Word document,  
19 I think we can see three things: firstly, if it's  
20 enabled -- and here it was -- the changes are tracked by  
21 being put in red and underlined, yes? That's the first  
22 thing we can see.

23 **A.** Yes, I can see that.

24 **Q.** Then the second thing is, if we hover, as the operator  
25 kindly has, above an amendment, we can see who made the

22

1 in the middle, thank you; then the middle of the page;  
2 then do one at the bottom of the page; then over the  
3 page, yes?

4 **A.** Yes.

5 **Q.** All of the amendments made by you. So these were all  
6 made by you, Graham C Ward. This isn't a case of  
7 somebody else surreptitiously logging in to your system  
8 and pretending to be you; these are amendments made by  
9 you?

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

11 **Q.** Can we go back to page 1 and look at the substance,  
12 then. The first thing you do in that second paragraph  
13 is you're effectively writing in, to Mr Jenkins' witness  
14 statement, him exhibiting three ARQs; is that right? So  
15 it says:

16 "Audit Record Queries (ARQs) 401, 459 and 460 ...  
17 I was asked to produce information relating to 'Nil'  
18 transactions during the period specified. I have  
19 produced three spreadsheets which I now produce as  
20 exhibits GIJ01, GIJ02 and GIJ03."

21 Yes? So that's you writing into Mr Jenkins'  
22 statement the exhibiting by him of the responses to  
23 three ARQs, yes?

24 **A.** Yes.

25 **Q.** Then scrolling down. Is this right: you effectively

24

1 explain the format of those three ARQs?  
 2 **A.** Yes.  
 3 **Q.** Okay, I've got no questions about that but, if we go to  
 4 the second page, please, and look at the second big  
 5 paragraph down. The one beginning "There are three  
 6 main". Originally the statement read:  
 7 "There are three main reasons why a zero value  
 8 transaction may be generated as part of the banking  
 9 system."  
 10 If we hover above the word "main", you deleted that,  
 11 didn't you?  
 12 **A.** Yeah.  
 13 **Q.** Then you added in the words "if these are the main  
 14 reasons, what are the rest?" As we established on the  
 15 last occasion, that was you asking a clarificatory  
 16 question, correct?  
 17 **A.** That's correct, yeah.  
 18 **Q.** Then the three reasons were set out in the witness  
 19 statement:  
 20 "[1] The transaction has no financial effect  
 21 (ie a balance enquiry or a PIN change).  
 22 "[2] The transaction has been declined by the Bank.  
 23 "[3] There has been some sort of System Failure.  
 24 Such failures are normal occurrences."  
 25 If we hover above those, you deleted those words,  
 25

1 intention for it to be removed from that statement --  
 2 **Q.** Let's put aside the intention issue for the moment,  
 3 Mr Ward. On the last occasion you denied deleting the  
 4 third reason: you said, "It's just not me. I know the  
 5 type of person I am". Do you agree that, in fact, you  
 6 did delete that third explanation from Mr Jenkins'  
 7 witness statement?  
 8 **A.** I can see that now, yes.  
 9 **Q.** Can we turn to what you wrote after your deletion:  
 10 "This a really poor choice of words which seems to  
 11 accept that failures in the system are normal and  
 12 therefore we well support the postmaster's claim that  
 13 the system is to blame for the losses!!!!"  
 14 Do you agree that discloses your motive for deleting  
 15 the third explanation?  
 16 **A.** No, I don't agree with that. I'm just reviewing  
 17 a statement. You know, I can see how it looks now,  
 18 I really can.  
 19 **Q.** Never mind how it looks now. Do you agree that the  
 20 connection between the deletion of the words and what  
 21 was in your mind is shown by the explanation that you've  
 22 added in round brackets?  
 23 **A.** Yeah, well, I can agree that there's a connection, yes.  
 24 **Q.** And that connection is: it needs to be deleted because  
 25 if it's left there, it might support the postmaster,  
 27

1 didn't you?  
 2 **A.** Well, yeah, I mean, I've obviously put a line through it  
 3 but, as I said at the outset, what I was doing here was  
 4 reviewing this statement. My intention was not to  
 5 insist on anything being put in or removed. I'm just  
 6 reviewing it as I was asked to do.  
 7 **Q.** In what way is reviewing a statement consistent with  
 8 putting a line through something and deleting it?  
 9 **A.** Well, it was -- I can't explain that. I really can't.  
 10 **Q.** You agree that you deleted the words -- the third reason  
 11 that Mr Jenkins had given for a nil transaction value  
 12 appearing -- "There has been some sort of System  
 13 Failure, such failures are normal occurrences"; you  
 14 agree that you deleted those words?  
 15 **A.** I've put a line through it, yes, I can see, and it's  
 16 deleted, and that's what it says on there. But my  
 17 intention was absolutely not to have anything deleted  
 18 from that statement that Mr Jenkins wasn't happy with at  
 19 all. I was just trying to help him and to review  
 20 a statement.  
 21 **Q.** Do you agree with this, Mr Ward: that, contrary to your  
 22 denial on the last occasion, both in answer to questions  
 23 from me and from the Chairman, you did delete the third  
 24 explanation?  
 25 **A.** I can see that I've deleted it, yes, but it was not my  
 26

1 Mr Thomas', defence, agreed?  
 2 **A.** As I've said, you know, my intention was not for  
 3 anything to be deleted but I can see that, yes, that's  
 4 how it looks.  
 5 **Q.** Do you agree that the information that you deleted was  
 6 material to the prosecution of Mr Jenkins (*sic*)?  
 7 **A.** Yes.  
 8 **Q.** Do you agree that, by the time that you deleted it, you  
 9 knew that a prosecution had been commenced against him?  
 10 **A.** Yes, I do --  
 11 **SIR WYN WILLIAMS:** There may be some confusion. You said,  
 12 "Mr Jenkins", Mr Beer --  
 13 **MR BEER:** I'm so sorry.  
 14 **SIR WYN WILLIAMS:** -- but we all know Mr Thomas --  
 15 **MR BEER:** Mr Thomas, I'm so sorry.  
 16 I'll ask the question again: did you know that, by  
 17 the time of your deletion, a prosecution had been  
 18 commenced by Mr Thomas?  
 19 **A.** Yes, I knew there was a prosecution against Mr Thomas.  
 20 **Q.** Do you accept that, by your conduct, you caused to be  
 21 removed material information from Mr Jenkins' witness  
 22 statement at the time that a prosecution was afoot  
 23 against Mr Thomas?  
 24 **A.** No, I don't. I think the decision to remove that had to  
 25 have been Mr Jenkins' decision. I've made a comment and  
 28

1 I've made a review and I accept that I shouldn't have  
 2 been doing that, but the final decision to make that  
 3 statement and for the -- you know, for what went in  
 4 there, that was for Mr Jenkins to decide.

5 **Q.** You've agreed, I think, that your reason for deleting  
 6 that line from the statement was that it might support  
 7 the defendant's case that Horizon was to blame for the  
 8 losses that were being attributed to him, agreed?

9 **A.** Yes.

10 **Q.** If we read on, as per the original witness statement, it  
 11 said:

12 "Each transaction has ... with it a response code  
 13 field, which identifies what has happened. Those values  
 14 are included (together with their descriptions) in the  
 15 ..."

16 Originally it said "ARQs" and you've added  
 17 "Spreadsheets produced".

18 Then "In summary". I'm going to skip over the next  
 19 two paragraphs which deal with values of 1 or between 2  
 20 and 10, but the third one, which you do amend is:

21 "[A response code] RespCd with a value greater than  
 22 10 implies some sort of system failure -- The actual  
 23 value provides further information as to the nature of  
 24 the failure within the overall system."

25 So, rather oddly, you've left that in the witness  
 29

1 **Q.** Why did you delete it?

2 **A.** As I've said, yes, it looks -- I've put a line through  
 3 it and I've put, you know, in brackets that I think it's  
 4 a poor choice of words but that is just me reviewing it.  
 5 I'm not, for one second, suggesting anything needs to be  
 6 removed from the finalised statement.

7 **Q.** You didn't just say it was a poor choice of words. In  
 8 the brackets, you said that, if we leave those words in,  
 9 it "may well support the subpostmaster's claim that the  
 10 system is to blame for the losses". That's what was  
 11 motivating you, wasn't it?

12 **A.** No, I don't believe it was, no. I mean it's just a poor  
 13 choice of words.

14 **Q.** Poor choice of words by who?

15 **A.** Well, by me, obviously.

16 **Q.** Why, when you spent 52 minutes amending this witness  
 17 statement, did you select "a poor choice of words"?

18 **A.** Well, I don't know. I really don't know. I'm just  
 19 going to repeat what I've said. I mean, I haven't got  
 20 anything else I can add to it. I was trying to  
 21 genuinely help put a statement together for him.  
 22 This -- you know, back in 2006, Horizon integrity just  
 23 wasn't an issue for us at all and this was a fairly new  
 24 statement, as I said on my previous evidence, I think,  
 25 a banking transaction witness statement. So I was just  
 31

1 statement, haven't you?

2 **A.** Yes.

3 **Q.** Was that just a mistake by you, that it ought to have  
 4 been, if you were acting consistently with your earlier  
 5 deletion, to have been deleted as well, ie the mention  
 6 of a system failure?

7 **A.** No, not at all. It's not a mistake. I mean, there's  
 8 just a bit more context.

9 **Q.** What does that mean, Mr Ward? You deleted the system  
 10 failure reason why zero transactions may be generated,  
 11 but left in an explanation of the response code values  
 12 relating to system failure?

13 **A.** Well, as I say, you know, going back 18 years, or  
 14 whatever it is now, I can't really remember what I would  
 15 have been thinking then but the fact that that paragraph  
 16 there has a little bit more information in it, you know,  
 17 made sense to me then.

18 **Q.** What do you mean, that paragraph had a bit more  
 19 information, made sense to you?

20 **A.** Because it's got a value greater than 10 implies some  
 21 sort of system failure. There's a bit more information  
 22 than just saying "system failure". That is all I can  
 23 think that I would have been thinking at that time.

24 **Q.** But you wanted the system failure reason deleted?

25 **A.** I didn't want it deleted, no.  
 30

1 trying to get the statement correct. That was my  
 2 intention and I'm really sorry for the way it comes  
 3 across, I really am, but I was trying to just do my job.

4 **Q.** That last paragraph there, the one that says, "[Response  
 5 code] with a value greater than 10", you're not saying  
 6 to us that you left that in the witness statement  
 7 because you thought that that was a sufficient  
 8 explanation to a court and gave adequate disclosure to  
 9 a defendant and that that was, therefore, justification  
 10 for deleting the third reason from Mr Jenkins' list?

11 **A.** Well, I really don't know. But I just think there's  
 12 more context to it there. That's all I can say. I'm  
 13 sorry, it's such a long time ago. I just really just do  
 14 not remember this at all.

15 **Q.** Can I suggest one explanation: that this was a rather  
 16 sloppy attempt at covering up, in criminal proceedings,  
 17 evidence of system faults within Horizon and that, if  
 18 you'd been pursuing your motive properly, you would have  
 19 also deleted that last paragraph that we've just read.  
 20 It's just a mistake by you that you haven't seen through  
 21 the task that you were setting for yourself.

22 **A.** No, that's absolutely not. I wouldn't agree there. I'm  
 23 not trying to cover anything up at all. I'm just trying  
 24 to get a statement correct.

25 **Q.** Your motive was that you didn't want to disclose, in the  
 32



1 prosecution of Noel Thomas, information that suggested  
 2 that a fault in Horizon could have caused nil  
 3 transactions, agreed?  
 4 **A.** No, I don't agree.  
 5 **Q.** Can we look, please, lastly, at the original email.  
 6 FUJ00122210. Look at your email if we just scroll down.  
 7 Thank you. You say:  
 8 "This statement needs more work ..."  
 9 That's the statement we've just read.  
 10 "... I've attached a suggested draft with a number  
 11 of comments ..."  
 12 Then you say:  
 13 "... (as previously mentioned, I think the 'system  
 14 failure ... normal occurrence' line is potentially very  
 15 damaging)."  
 16 So the very line that you deleted, you recognised to  
 17 be "potentially very damaging", agreed?  
 18 **A.** Yes, but I just wanted more context on it, as I've said.  
 19 **Q.** You say that that line that you deleted was "potentially  
 20 very damaging". That, again, draws a direct line  
 21 between the reason for the deletion of the line and the  
 22 deletion of the line, doesn't it?  
 23 **A.** I can see that it looks that way, yes.  
 24 **Q.** Well, it is that way, isn't it? That's the motive,  
 25 right there, in black and white: "I'm deleting it  
 33

1 there were, rather --  
 2 **Q.** In which case, you would have typed, Mr Ward, "Can  
 3 I have some more context, please, on what system  
 4 failures are?", rather than deleting "system failures"  
 5 from the witness statement and saying, three times, "We  
 6 need to delete this because it's damaging, it's  
 7 potentially embarrassing, and it would assist the  
 8 subpostmaster's defence".  
 9 **A.** I can see how you would say that, yes. I do understand  
 10 that but, as I've said, I don't recall finalising the  
 11 final statement either and that's why I'm suggesting  
 12 that somebody from the team should go and take the  
 13 statement directly.  
 14 **Q.** Your motive was a desire that the Post Office was not  
 15 embarrassed at court by revealing that Horizon had  
 16 defects, system errors, wasn't it?  
 17 **A.** No, not at all. My desire was that the statement was  
 18 produced correctly. I was unaware that there were bugs,  
 19 errors and defects in the Horizon system.  
 20 **Q.** Mr Jenkins was saying that there are defects in the  
 21 system, in his witness statement, and you were deleting  
 22 that information?  
 23 **A.** He said there were system failures.  
 24 **Q.** And you wanted that deleted?  
 25 **A.** I didn't want it deleted, no.  
 35

1 because it's potentially very damaging"?  
 2 **A.** There is no motive for me to remove anything because,  
 3 at the time, there was absolutely, in my head, no issues  
 4 with Horizon at all.  
 5 **Q.** If we look at the second paragraph:  
 6 "Whilst there is some urgency with this, it is more  
 7 important to get it right and ensure we are not  
 8 embarrassed at court, which we certainly could be if we  
 9 produced a statement accepting 'system failures are  
 10 normal occurrences'. "  
 11 Again, that's the third occasion, one in the witness  
 12 statement itself, in your comment, and the other two in  
 13 the covering email, this email, that reveals what was  
 14 operating on your mind, agreed?  
 15 **A.** I think what I take from that is, it's more important to  
 16 get it right because I want to get the statement right.  
 17 I didn't think there were any issues with Horizon. We  
 18 weren't told there were any issues with Horizon. So the  
 19 idea that I'd be covering anything up just wouldn't have  
 20 been in my head at all.  
 21 **Q.** Why did you say, "we need to ensure we're not  
 22 embarrassed at court, which we could be if we produced  
 23 a statement accepting 'system failures are normal  
 24 occurrences'"?  
 25 **A.** Because I wanted more context on what system failures  
 34

1 **Q.** Why did you delete it?  
 2 **A.** I didn't delete it, as I've said to you.  
 3 **Q.** In what sense is striking through --  
 4 **A.** I can see --  
 5 **Q.** -- a sentence in tracked changes and providing three  
 6 explanations why that should be removed not a case of  
 7 deletion?  
 8 **A.** I can see how it looks, I really can, and I'm sorry it  
 9 looks that way but I can assure you, my intention was  
 10 not for that to be deleted.  
 11 **MR BEER:** Mr Ward, they are the only questions that I ask  
 12 you.  
 13 Sir, do you have any questions?  
 14 **SIR WYN WILLIAMS:** No. Thank you very much.  
 15 **MR BEER:** Sir, that's all of the evidence from Mr Ward this  
 16 morning. Because he's remote, we need to take a break  
 17 now until we move to our next witness, who is live.  
 18 **SIR WYN WILLIAMS:** Yes. All right.  
 19 Well, thank you for returning to give evidence,  
 20 Mr Ward. That completes your evidence to the Inquiry.  
 21 So we'll now have a ten-minute break, Mr Beer?  
 22 **MR BEER:** Yes, I think probably 15, actually, to get the  
 23 screens out.  
 24 **SIR WYN WILLIAMS:** All right, fine. 15-minute break before  
 25 we resume. So that will be -- well --  
 36

1 **MR BEER:** 10.50?  
 2 **SIR WYN WILLIAMS:** 10.50, yes.  
 3 **(10.37 am)**  
 4 **(A short break)**  
 5 **(10.52 am)**  
 6 **MS HODGE:** Good morning, sir, can you see and hear us?  
 7 **SIR WYN WILLIAMS:** Yes, thank you very much.  
 8 **MS HODGE:** Our next witness is Anthony Kearns.  
 9 **SIR WYN WILLIAMS:** Yes.  
 10 **MS HODGE:** Please can the witness be sworn.  
 11 **ANTHONY PAUL KEARNS (sworn)**  
 12 **Questioned by MS HODGE**  
 13 **MS HODGE:** Mr Kearns, as you know, my name is Ms Hodge and  
 14 I ask questions on behalf of the Inquiry. Please give  
 15 your full name.  
 16 **A.** Anthony Paul Kearns.  
 17 **Q.** You should have in front of you a witness statement  
 18 dated 9 May this year. Have you got that there, please?  
 19 **A.** I have.  
 20 **Q.** This is the second statement which you've provided to  
 21 the Inquiry; is that correct?  
 22 **A.** It is.  
 23 **Q.** It runs to 15 pages. Can I ask you, please, to turn to  
 24 page 14 of that statement.  
 25 **A.** Yes.

37

1 **A.** It is.  
 2 **Q.** Thank you. Now, in terms of your roles and  
 3 responsibilities, you were previously employed as  
 4 an Assistant Secretary of the Communication Workers  
 5 Union between 1997 and 2002; is that right?  
 6 **A.** That's correct.  
 7 **Q.** Whilst employed in that role, your primary  
 8 responsibility was to promote the interests of CWU  
 9 members who were employed by Post Office Limited; is  
 10 that right?  
 11 **A.** Correct.  
 12 **Q.** This would have included post office counter clerks who  
 13 were employed at Crown Office branches, staff working in  
 14 cash centres and administration staff working in the  
 15 Post Office's back offices; is that right?  
 16 **A.** Correct.  
 17 **Q.** You say that, since 2002, you've been employed as the  
 18 Senior Deputy General Secretary of the Communication  
 19 Workers Union; is that right?  
 20 **A.** That's correct.  
 21 **Q.** You were elected to perform that role by the members of  
 22 the union; is that right?  
 23 **A.** Yes.  
 24 **Q.** In your statement, you say you've not had any direct  
 25 responsibility for Post Office matters since your

39

1 **Q.** Do you see your signature there at the end of the  
 2 statement?  
 3 **A.** It's actually not on this hard copy that I've got.  
 4 **Q.** If you could just bear with us. We'll ensure that you  
 5 have a copy with your signature.  
 6 **A.** Yes.  
 7 **Q.** Thank you. You can see your signature there at the end  
 8 of the statement dated 9 May this year?  
 9 **A.** *(The witness nodded)*  
 10 **Q.** That's right?  
 11 **A.** Yes.  
 12 **Q.** Thank you. Is the content of that statement true to the  
 13 best of your knowledge and belief?  
 14 **A.** It is.  
 15 **Q.** Thank you. That statement will stand as your evidence  
 16 to the Inquiry in Phases 5 and 6. I shall be asking you  
 17 some questions that seek to expand upon and clarify some  
 18 aspects of your evidence.  
 19 You first appeared before the Inquiry on 29 November  
 20 2022, when we were examining issues of relevance to  
 21 Phase 2; is that correct?  
 22 **A.** Correct.  
 23 **Q.** I don't intend to revisit those issues with you, save to  
 24 the extent that they are relevant to the issues that  
 25 we're examining in Phases 5 and 6; is that clear?

38

1 appointment as Senior Deputy General Secretary; is that  
 2 right?  
 3 **A.** That's correct.  
 4 **Q.** Who within the senior leadership of the Communication  
 5 Workers Union has direct had direct responsibility for  
 6 postal matters since 2002?  
 7 **A.** Andy Furey.  
 8 **Q.** Thank you. I'd like, very briefly, to revisit some of  
 9 the evidence which you gave on the last occasion about  
 10 your role as a member of the Horizon Working Group  
 11 during 1999 to 2000. This was at a time when you were  
 12 employed as Assistant Secretary with responsibility for  
 13 Post Office employees; is that right?  
 14 **A.** Yes.  
 15 **Q.** The Horizon Working Group had been established to  
 16 oversee the operational live trial and later the  
 17 national rollout of the Horizon system to the Post  
 18 Office Network; is that correct?  
 19 **A.** Correct.  
 20 **Q.** You confirmed on the last occasion that you gave  
 21 evidence to the Inquiry that you were made aware of  
 22 technical issues being raised during the live trial; is  
 23 that right?  
 24 **A.** Correct.  
 25 **Q.** You understood these to relate to balancing; is that

40

1 right?

2 **A.** I was informed by Crown Office staff on visits that

3 I would make to local branches that some individuals

4 were experiencing difficulties with balancing, following

5 the introduction of the Horizon project.

6 **Q.** Just to confirm, by "balancing", you mean whether the

7 money received in and paid out by the branch was

8 accurately recorded in the weekly financial accounts; is

9 that right?

10 **A.** Each counter clerk employed at a Crown Office is

11 responsibility for their own individual balance on

12 a Wednesday, the end of the balancing week, and that's

13 when that balance takes place.

14 **Q.** I think you said on the last occasion that problems with

15 balancing had been reported to you before Horizon was

16 implemented; that's correct, is it not?

17 **A.** Yeah, we regularly had staff who reported difficulties

18 with balancing prior to, and subsequent to, the

19 introduction of Horizon.

20 **Q.** But you said that, after the introduction of Horizon, it

21 was your perception at the time that the number of

22 people reporting problems had increased?

23 **A.** Yes.

24 **Q.** Is that right? I think you've just confirmed that that

25 was information you obtained during your visits to local

41

1 managers would have had sufficient knowledge or

2 understanding to identify whether a balancing problem

3 was caused by the system or by the employee's

4 performance?

5 **A.** I couldn't say whether they were able to identify

6 specifically whether a misbalance, a loss or a gain, was

7 directly attributable to the system.

8 **Q.** If you were not tracking the issue at a national level,

9 how would your local reps know whether they were dealing

10 with an isolated incident or an issue affecting several

11 branches or employees?

12 **A.** I think I made in my last -- in one of my statements or

13 the last time I gave evidence -- so we have a network of

14 representatives who operate at local branch level, sort

15 of area level, regional level, and then a national

16 executive, and what would happen if somebody was -- so

17 there was a process in place, a losses and gains

18 procedure, and what would happen is, if somebody was

19 considered by the Post Office to be falling foul of that

20 procedure, they would be called for interview.

21 They would talk to their local rep or their area rep

22 or their regional rep and ask for representation. So

23 dealing with those -- the idea of that system as the

24 idea all of the agreements and so the industrial

25 relations framework we had with the Post Office at the

43

1 branches?

2 **A.** Correct.

3 **Q.** Were these problems with balancing an issue that you

4 were recording or tracking at a national level within

5 the Communication Workers Union at the time?

6 **A.** No, we had a process, which I think I outline in my

7 witness statement, for how losses and gains or incorrect

8 balances were dealt with through a system losses and

9 gains procedure that was in place at the time and

10 subsequent to the Horizon project.

11 **Q.** We'll come on shortly to that but just dealing firstly

12 with the issue of how the issue was being, let's say,

13 monitored, I think your evidence is it wasn't, at

14 a national level; is that fair? That is to say that you

15 weren't keeping records or you weren't tracking the

16 number of branches or the number of staff who were

17 having difficulties with balancing?

18 **A.** No, there was no facility or process for that.

19 **Q.** Would it be fair to say that you were relying on those

20 local procedures to identify whether balancing problems

21 were caused by the system or by the performance of the

22 employee?

23 **A.** Yes, that would be dealt with through that losses and

24 gains procedure, at various levels.

25 **Q.** Do you think that local representatives and branch

42

1 time, and still through to today, is to get these

2 matters dealt with, for want of a better phrase, at the

3 coalface, at the lowest common place you can deal with.

4 So people having local firsthand knowledge would be the

5 office rep; subsequent to that would be the area rep.

6 So if someone found themselves in difficulties over the

7 losses and gains procedure and was going to be called

8 for interview, they would contact their local rep or

9 their union branch and they would deal with the issue.

10 So those issues were dealt with predominantly by --

11 at a local level.

12 **Q.** I understand the point you're making but I think that

13 the gist of my point is this: if it's not being looked

14 at at a national level, would those local reps and those

15 local branches would they be able to know that this is

16 something that was affecting more than one area, do you

17 think?

18 **A.** Yeah, we would have regular meetings of -- local reps

19 would meet regularly at branch level. Area reps,

20 regional reps, would get together and discuss the

21 problems that they were facing, how best to deal with

22 them.

23 **Q.** So you would have expected that to have been discussed

24 at those -- at the branch level at the regional level,

25 if it had been something that was causing significant

44

1 difficulties. Is that --

2 **A.** If those reps had a wide scale concern, yeah, I'd expect  
3 them to discuss it with each other. Standard practice,  
4 is sort of sharing, you know, "I've got this problem,  
5 how have you dealt with that? I've got a new problem,  
6 how have you dealt with that?" That's how reps sort of  
7 interact and build up their knowledge.

8 **Q.** Now, when you finished in your role as assistant  
9 secretary, to whom did you hand over responsibility in  
10 2002?

11 **A.** Andy Furey was elected, so it wasn't me handing over  
12 responsibility. He was elected by the relationship --

13 **Q.** Into the role of Assistant Secretary?

14 **A.** Into the role of Assistant Secretary.

15 **Q.** Did you brief him on the knowledge you'd obtained during  
16 your time as a member of the Horizon Working Group?

17 **A.** Andy Furey was an elected member of our national  
18 executive, prior to being elected to that position, and,  
19 given that his background was a -- he was directly  
20 employed by the Post Office as a counter clerk, Crown  
21 Office staff. He worked closely with me and would  
22 attend a lot of national negotiations -- so, in reality,  
23 there was no formal handover, insofar as he'd worked in  
24 my department with me, for the previous five years. So  
25 he was more than well aware and was involved in a lot of

45

1 **A.** It is.

2 **Q.** Are you referring here to cases where the accounting  
3 discrepancies were shown by Horizon?

4 **A.** I'm referring to cases that our members would be called  
5 for interview under the losses and gains procedure.

6 **Q.** You said you were talking about your own personal  
7 experience. Is that before Horizon was implemented or  
8 after Horizon or both?

9 **A.** Both the losses and gains procedure is what was used to,  
10 for want of a better phrase, measure the ability of  
11 counter clerks to do their job. I was a counter clerk  
12 before I was an elected representative and the losses  
13 and gains procedure, in various formats -- it's been  
14 rewritten a number of times -- is the measure that  
15 individual counter clerks are held to see whether or not  
16 they can do their job. Each individual counter clerk,  
17 as I explained earlier, balances their stock on  
18 a Wednesday evening, that would either balance, or it  
19 would produce a loss or a gain, either of which, in the  
20 eyes of the Post Office, losses and gains are considered  
21 to be evidence of an inability to do the job to varying  
22 degrees, and there can be a variety of reasons why  
23 people record losses and gains, and then there was  
24 a process to take people through to investigate why  
25 those losses and gains have occurred, mostly designed to

47

1 discussions about these matters up to that point.

2 **Q.** So your evidence is you wouldn't have done a formal  
3 handover; is that right?

4 **A.** That's correct.

5 **Q.** But you think you would have discussed issues, including  
6 issues with the balancing, with him, before he took over  
7 that role?

8 **A.** Myself and Andy worked almost together on a daily basis  
9 over number of years and anything I was aware of in my  
10 role, he was aware of.

11 **Q.** I'd like to move on, please, to a new topic, another  
12 topic which concerns the support and the representation  
13 which was available to members of the Communication  
14 Workers Union if they were held accountable for  
15 shortfalls shown by Horizon. Now, you address this at  
16 paragraph 33 of your second witness statement, please,  
17 if that could be shown on the screen. WITN06370200, at  
18 page 7.

19 Paragraph 33, please. Thank you. This reads:  
20 "The CWU has always provided strong and effective  
21 representation for members accused of accounting  
22 discrepancies."  
23 Just pausing there, please. Is that assertion based  
24 upon your personal experience of representing members of  
25 the CWU?

46

1 be corrective.

2 **Q.** Mr Kearns, I wonder if I could please ask you if you can  
3 try to slow down in your answers, please, just to assist  
4 our stenographer who is making a verbatim record of what  
5 you're saying.

6 **A.** Apologies.

7 **Q.** Thank you. Forgive me, coming back to the question,  
8 please:  
9 Is it your evidence that you have personal  
10 experience of representing members of the Communication  
11 Workers Union who were accused of accounting  
12 discrepancies after Horizon was rolled out?

13 **A.** Me personally? No.

14 **Q.** No. Are you aware of any specific cases in which  
15 members were asked to account for shortfalls shown by  
16 Horizon?

17 **A.** No.

18 **Q.** Now, you have stated that your responsibilities relating  
19 to the Post Office ceased in 2002. From where have you  
20 obtained your knowledge of cases after that date?

21 **A.** I don't really have any detailed knowledge of cases  
22 after that date because it wasn't my responsibility. It  
23 wasn't my day job. I've paid a general interest to the  
24 union structures and how it represents its members since  
25 then because that's my job to sort of oversee partly how

48

1 the union functions, but I don't have any firsthand  
 2 experience since I left that role in 2002 of individual  
 3 cases.  
 4 **Q.** So would it be right to say that, as a general assertion  
 5 that you're making there, it's not one based on any  
 6 personal experience after 2002?  
 7 **A.** Apologies. General assertion, what?  
 8 **Q.** Sorry, you're making a general assertion that the CWU  
 9 has always provided strong and effective representation  
 10 for members accused of accounting discrepancies. What  
 11 I've been trying to explore with you is the basis of  
 12 that assertion and I think what you accept is that,  
 13 after 2002, you had no personal experience of those  
 14 matters, and you don't have any information about any  
 15 individual cases; is that right?  
 16 **A.** I don't have any personal experience and I didn't deal  
 17 with any individual cases. My assertion about the CWU  
 18 dealing with them is that the rep structures that we had  
 19 in place to deal with those issues, it's changed but it  
 20 remains broadly the same, as in we have local reps,  
 21 branch reps, what used to be called regional reps are  
 22 now called territorial reps, who deal with those issues  
 23 on a day-to-day basis and that procedure remains largely  
 24 in place as does a losses and gains procedure that they  
 25 would work with.

49

1 correct?  
 2 **A.** That's correct. I was employed by the Post Office in  
 3 1978 and there was a losses and gains procedure in place  
 4 then and some of the papers sent to me show a losses and  
 5 gains procedure from -- I think it's 2013 and 2014.  
 6 A losses and gains procedure for directly employed  
 7 counter clerks, as we used to call them, by the Post  
 8 Office, has been in place for that length of time.  
 9 **Q.** Would it be a fair summary to say that that policy  
 10 applied a threshold or number of thresholds below which  
 11 an accounting discrepancy would be treated as  
 12 a performance issue but above which it might be treated  
 13 as suspected theft; is that a fair summary?  
 14 **A.** No, that's not how the losses and gains procedure was  
 15 applied. The losses and gains procedure, if people fell  
 16 foul -- if individuals fell foul of that procedure, they  
 17 were given the opportunity to explain why they thought  
 18 that the Post Office would be saying to them "Your  
 19 performance is unacceptable, we need improvements,"  
 20 they'd be given deadlines, or a number of specific  
 21 occasions where they were allowed to misbalance before  
 22 more serious disciplinary action would ensue.  
 23 My experience is that mostly people would understand  
 24 the seriousness of the situation, for want of a better  
 25 phrase, apply themselves more diligently to their job

51

1 **Q.** Now, before we come to the losses and gains procedure,  
 2 do you know what type of training union representatives  
 3 received to enable them to provide support to staff who  
 4 found themselves in this situation, where they're being  
 5 asked to account for discrepancies?  
 6 **A.** Yes. We would run what we would call schools,  
 7 educational classes every time -- more or less every  
 8 time a major agreement would change and we would get  
 9 reps together at varying levels, explain to them any  
 10 changes we'd negotiated in policies and procedures and  
 11 train them through what we would call basic skills -- we  
 12 now call them skills 1, skills 2 -- on how to be  
 13 an effective rep, how to engage with an individual who  
 14 might be having problems, how to represent that to the  
 15 employer. Yeah, we had an education and training  
 16 programme, designed to do just that.  
 17 **Q.** Now, you go on to say at paragraph 33, that the:  
 18 "CWU collective agreements including the 'Losses and  
 19 Gains Procedure' have been significant ensuring a fair  
 20 hearing for directly employed members."  
 21 You referred to that procedure in your evidence  
 22 before the Inquiry on the last occasion. I think you  
 23 recall it being in place at the time when you were  
 24 assistant secretary and you've said, just now, it's  
 25 something which has been updated over the years; is that

50

1 and were very unlikely to fall foul of that procedure to  
 2 the point of dismissal.  
 3 **Q.** I think if we put to one side what might be  
 4 characterised as small discrepancies, in the order of £5  
 5 or £6, which would ordinarily be treated as  
 6 a performance matter -- is that fair --  
 7 **A.** Yes.  
 8 **Q.** -- and if we consider a more substantial discrepancy, in  
 9 the order of several hundred pounds or possibly even  
 10 several thousand pounds, a discrepancy of that type,  
 11 would it not be referred to the Post Office to be  
 12 investigated as suspected criminal activity?  
 13 **A.** My experience was single large losses like that would be  
 14 dealt with outside of this process and would usually be  
 15 subject to a specific investigation.  
 16 **Q.** So if Horizon was showing a substantial shortfall, which  
 17 a Post Office staff member could not explain, they would  
 18 not be helped by this procedure, would they? That is to  
 19 say that they would be in exactly the same position as  
 20 a subpostmaster who had a substantial shortfall which  
 21 they couldn't explain, would they not?  
 22 **A.** If, at the end of the week, an individual counter  
 23 clerk's balance, either or pre or post-Horizon, showed  
 24 up a significant amount of the amounts that you've  
 25 referred to, my experience is that that would be

52

1 investigated by the Post Office Investigation Branch, as  
2 it was then, or whatever its title is now.

3 **Q.** Essentially, you, as the CWU, and that staff member,  
4 would be reliant upon the Post Office investigating the  
5 cause of the shortfall, would you not, and establishing  
6 whether any fault lay within the system?

7 **A.** Yeah, the Post Office -- they would interview the  
8 individual for their view of why such a loss occurred,  
9 and then the Post Office would make its own  
10 investigations.

11 **Q.** Now, if we go back, please, to your statement at  
12 paragraph 33, you go on to say that:

13 "The CWU has no record of any of our directly  
14 employed members losing their jobs or being prosecuted  
15 due to problems with Horizon."

16 What I want to ask you is this: does the CWU make  
17 and retain records relating to the dismissal or the  
18 prosecution of its employees -- of its members, forgive  
19 me.

20 **A.** No.

21 **Q.** If you don't have any record, or if you don't make and  
22 retain such records, does it not follow that there might  
23 well be directly employed members who have lost their  
24 jobs or been prosecuted due to problems with Horizon, of  
25 which you're not aware?

53

1 been the case; is that fair?

2 **A.** Yeah, we would assume our reps would tell us if they  
3 were being asked by our members to assist them in such  
4 cases.

5 **Q.** You've also said earlier that you would have expected  
6 these issues, accounting discrepancies, to be resolved  
7 at a local level and that you didn't expect that to be  
8 something that would be escalated to national level?

9 **A.** There are two separate things.

10 **Q.** In what sense?

11 **A.** So I work at a Crown Office. I used to work at a Crown  
12 Office and I work alongside people who on a Wednesday  
13 night would do their balance and would misbalance more  
14 regularly than the losses and gains procedure at the  
15 time allowed for. So they would be interviewed by the  
16 Post Office with their union rep or their local area  
17 union rep and they would go through the losses and gains  
18 process with the intention of rectifying their  
19 performance on the job, so to speak.

20 There were regular occurrences. When I was a local  
21 rep I used to deal with those cases on behalf of the  
22 members, one or two a month. They're just dealt with at  
23 local level and that's where it ends, and that's the  
24 idea of that procedure, is to rectify those problems,  
25 for want of a better phrase, at the coalface, so that

55

1 **A.** That's possible.

2 **Q.** So would it not be more accurate to say that you don't  
3 know whether, and, if so, how many, of your members have  
4 lost their jobs or been prosecuted due to problems with  
5 Horizon because this isn't something which you've  
6 actively monitored?

7 **A.** So the statements I make, which is the CWU has no direct  
8 record of any of our directly employed members losing  
9 their jobs or being prosecuted due to problems with  
10 Horizon is a statement of fact for -- as far as I'm  
11 concerned. We don't have that record.

12 Because of the extensive network we have of reps and  
13 the relationship we have between the national officials  
14 and our local reps and regional reps, my belief is that  
15 we would be made aware if individuals had come to our  
16 reps at local level and said to us "We're losing our  
17 jobs" or "We're being" -- let's take the issue of  
18 prosecution. If any of our members were to be  
19 prosecuted over that, we're fairly certain that they  
20 would come to our reps through the process I've outlined  
21 and, if -- if our reps thought that was a problem, they  
22 would come to us but we don't have any record of that.

23 **Q.** Now, I think what you've just said really is that you  
24 make an assumption that that information would have  
25 filtered its way up to national headquarters if that had

54

1 the individual counter clerk can prove that their doing  
2 their job properly.

3 It's also true to say that, if our members were  
4 being dismissed or prosecuted and our reps felt that  
5 was, for want of a better phrase, unfair and wanted to  
6 defend them and wanted our assistance in helping them do  
7 that, they would come to us.

8 **Q.** Are you saying that, at that stage, there would be some  
9 record held centrally of a request for assistance or  
10 that, effectively, you would have some records showing  
11 that that request had been made?

12 **A.** Yeah, if they -- if somebody wanted us to help assist  
13 them in representing a member, they would email -- back  
14 to '99, write to us -- with details of the case, asking  
15 us could we assist or was it possible to assist,  
16 depending on the nature of the individual case.

17 **Q.** But any record of that would have been in emails at the  
18 time, which presumably you haven't gone back and checked  
19 over, have you?

20 **A.** Yeah, we asked our research department what documents  
21 and I think our research department and Andy Furey's  
22 department -- my successor in that previous role --  
23 provided a number of documents to the Inquiry over the  
24 last couple of years, with regards to what information  
25 we have around Horizon. And we haven't come across --

56

1 to my knowledge, we've not come across any  
 2 correspondence, emails or letters of that type.  
 3 **Q.** Now, the final thing you say in paragraph 33 is this:  
 4 "There have been cases of actual theft amongst CWU  
 5 represented grades, but invariably when people are  
 6 caught out they are quick to admit to theft. In these  
 7 cases, the CWU is generally not involved as people  
 8 resign before being dismissed."  
 9 Now, again, are you speaking here from your personal  
 10 experience of dealing with cases of theft?  
 11 **A.** Yes.  
 12 **Q.** On how many occasions were you called upon to deal with  
 13 cases of theft by CWU staff members while you worked as  
 14 the assistant secretary?  
 15 **A.** Not when I worked as assistant secretary but when  
 16 I worked as a local rep -- when I was a local rep --  
 17 back in Liverpool. When I worked as a local rep back in  
 18 Liverpool, I dealt with -- from memory, it's 30 years  
 19 ago -- from memory, three cases of individuals accused  
 20 of theft.  
 21 **Q.** Was it your experience that members who were accused of  
 22 theft by the Post Office always admitted their guilt?  
 23 **A.** Of the three cases I remember dealing with, one didn't,  
 24 and we subsequently won that case in Employment  
 25 Tribunal. The Post Office had no evidence. One

57

1 prosecuting staff members and you've just referred now  
 2 to an incidence of that. You also stated that, prior to  
 3 Horizon, I think you'd represented a member of the CWU  
 4 who'd gone on to be prosecuted by the Post Office. In  
 5 which type of hearings would you be representing  
 6 individuals at that stage?  
 7 **A.** So the individual concerned showed to a £500 loss in  
 8 their weekly balance. They were then called to  
 9 interview by the Post Office investigation branch and  
 10 then allowed to have friend/witness in and the Post  
 11 Office investigation branch put it to them that a loss  
 12 of that figure, around 500, couldn't possibly have been  
 13 a discrepancy; it was theft. And the individual denied  
 14 it and we went through the process of them being  
 15 dismissed, me doing the appeal, and it was at the appeal  
 16 stage that the individual changed their position and  
 17 said that, in fact, they did steal the money.  
 18 So yeah, that's how that process is dealt with.  
 19 So, under the investigation process, the  
 20 individual's allowed to have a witness/friend, whatever  
 21 you want to call it, in the room with them,  
 22 predominantly to make sure that that interview is  
 23 conducted correctly, fair play, in line with rules. Yeah,  
 24 and so I've dealt with that case.

25 **Q.** So you would have dealt with it and others in your

59

1 individual -- I think I made this in my earlier  
 2 submission, one individual was accused of stealing £500,  
 3 who denied it, right up until the final interview and  
 4 then admitted it, and then resigned, and then was  
 5 subsequently prosecuted.  
 6 **Q.** Were you involved in any cases of alleged theft after  
 7 Horizon was rolled out?  
 8 **A.** No.  
 9 **Q.** Therefore, insofar as you make a general statement about  
 10 cases of theft, is it right to say that that wouldn't  
 11 apply to the period after 2002, of which you didn't have  
 12 any personal experience?  
 13 **A.** I have no experience after 2002. Sorry, maybe I'm  
 14 misunderstanding the question, sorry.  
 15 **Q.** Sorry, it was badly phrased, so that's my fault. I'm  
 16 saying, insofar as you make a general statement about  
 17 cases of theft, it's right to say that that applies  
 18 prior to 2002 but not afterwards; is that fair?  
 19 **A.** I wasn't dealing with them after 2002 but, generally --  
 20 what I say in my statement, generally, is the CWU  
 21 generally is not involved, as my experience is, if  
 22 people are guilty, then they resign rather than wait to  
 23 be dismissed. I've seen that, prior to 2002.  
 24 **Q.** Thank you. Now, when you previously gave evidence you  
 25 said that you were aware of the Post Office practice of

58

1 position would have dealt with it at this stage of the  
 2 internal disciplinary hearing; is that right?  
 3 **A.** Yes.  
 4 **Q.** And any appeal hearing --  
 5 **A.** Yes.  
 6 **Q.** -- which followed. Did the CWU offer legal  
 7 representation to members against whom criminal  
 8 proceedings were brought by the Post Office?  
 9 **A.** CWU does not offer legal assistance to members for  
 10 criminal cases.  
 11 **Q.** That's in any circumstances?  
 12 **A.** To the best of my knowledge and experience, yes.  
 13 **Q.** You've been shown some statistics relating to the number  
 14 of prosecutions brought against subpostmasters,  
 15 assistants and Post Office employees in the decade  
 16 before and in the decade after Horizon was introduced;  
 17 is that right?  
 18 **A.** Correct.  
 19 **Q.** Now, it's right to acknowledge that the records on which  
 20 these statistics are based are incomplete, particularly  
 21 insofar as they relate to the decade before Horizon was  
 22 implemented. But I think you accept, do you not, that,  
 23 on the basis of the data we do have, it tends to show  
 24 a substantial increase in the number of prosecutions  
 25 bought against Post Office employees after Horizon was

60

1 rolled out; is that fair?

2 **A.** They appear to double: 2002 over 2001; 2003 over 2001;  
3 drop back down again, 2004. So they fluctuate but it's  
4 certainly true to say in -- so assuming we're *(unclear)*  
5 enough to say the same thing, it says in 1999 for  
6 employees, which are the people we were responsible for,  
7 there were five, in 2001 there were six and then in 2002  
8 there were 13, in 2003 there were 13, in 2004 that  
9 dropped back down to seven, and then up to 11 in 2006  
10 and so it fluctuates. But it is correct to say that, in  
11 2002/2003, there were more than there were in 2001 and  
12 1999.

13 **Q.** Now, in your most recent statement, you say that you  
14 were not aware at the time of the rise in prosecutions  
15 and convictions of Post Office employees; is that right?

16 **A.** That's correct.

17 **Q.** Do you think you should have been aware or that you  
18 should have known about this in your role as assistant  
19 secretary and subsequently as Senior Deputy General  
20 Secretary of the union?

21 **A.** No, because, as I said earlier, they wouldn't get  
22 reported to us --

23 **Q.** Well --

24 **A.** -- at national level, sorry.

25 **Q.** But I think you said the opposite. I think you said you

61

1 **Q.** What you seem to be saying, essentially, is that you  
2 were relying upon your local rep effectively to identify  
3 if there was a system fault, were you not?

4 **A.** That is the system we have in place. As I explained  
5 earlier, the idea of dealing with discrepancies or  
6 even -- not just discrepancies in balancing, if you  
7 like, on the counter but any discipline cases for any  
8 reason -- insubordination, failure to attend for duty --  
9 the whole system was set up to deal with those issues  
10 quickly, at the point they occurred, and then there  
11 would be a process you would go through where, in more  
12 serious cases, there would be escalated up, in terms of  
13 the Post Office, their managerial structure and, in the  
14 case of the union, our representative structure. And  
15 that's how the issues would be dealt with.

16 So, insofar as we would have no record of, let's say  
17 in 1999, exactly how many individual members of the CWU  
18 were interviewed under the losses and gains procedure,  
19 we wouldn't have that record because they were dealt  
20 with locally. So, in the same way, if somebody was  
21 prosecuted, unless those individuals contacted us,  
22 unless representatives contacted us, we would have no  
23 record of that.

24 **Q.** Okay, so, unless either the member themselves or the  
25 local rep came to you and said, "I'm being prosecuted

63

1 would have expected -- had members been prosecuted, you  
2 would have expected that to have reached you at national  
3 level because you would have been told that?

4 **A.** No, I would have expected, if our local reps thought  
5 that they should have been involved, they thought  
6 something wasn't right, I would have expected them to  
7 have raised it with us at national level.

8 **Q.** So your expectation --

9 **A.** So I've referred -- sorry, so I referred earlier to they  
10 would email us or they would write us to saying "We've  
11 got a problem here, can you assist?" and so I would say  
12 "We have no record of that", that's why we wouldn't have  
13 been aware of, what, 1999, five prosecutions, if I'm  
14 reading this correctly; 2001, six prosecutions, if I'm  
15 reading it correctly. We would only have been aware or  
16 we would have been made aware if representatives who had  
17 been dealing with those cases had contacted us,  
18 basically to say, "I've been dealing with this case its  
19 looks like they're going to dismiss them, it looks like  
20 they're going to prosecute them, we don't think that's  
21 fair, we don't think that's right, is there something we  
22 can do can we talk about this?", so on and so forth.

23 I've no recollection of people coming to me in my  
24 role as the Assistant Secretary at national level and  
25 raising that type of complaint, if you like, or concern.

62

1 because of a shortfall in Horizon which isn't my fault  
2 it's the system at fault", you're saying that there  
3 would be no record and you would have no awareness of  
4 the fact of prosecutions being brought?

5 **A.** We would have no awareness at national level, no.

6 **Q.** Now, given what you knew about problems with balancing  
7 during the rollout of Horizon, do you think that the  
8 bringing of prosecutions by the Post Office is something  
9 which you ought to have been monitoring at a national  
10 level?

11 **A.** We weren't aware of the prosecutions at national level,  
12 so we wouldn't have been monitoring it.

13 **Q.** But my point is you knew that the Post Office brought  
14 prosecutions; is that not something which you should  
15 have proactively been monitoring?

16 **A.** So let me just step back on we were aware of the Post  
17 Office bringing prosecutions. At national level, we  
18 don't have a record, we don't keep a record of the  
19 prosecutions that the Post Office carries out. I think  
20 the point I made in my statement is, usually, by the  
21 time -- historically, by the time it got to that point,  
22 we'd have individuals resigning, so we wouldn't have  
23 a record of the prosecutions that the Post Office took  
24 out against direct employees.

25 **Q.** I understand what you're saying, which is you didn't

64



1 have one. My question was: do you think you should have  
 2 had one, bearing in mind that you knew that there were  
 3 increased numbers of Post Office staff who were  
 4 complaining about problems with balancing?  
 5 **A.** No, because they were dealt with under the balancing  
 6 procedure.  
 7 **Q.** I'd like to move on to another topic, please, which  
 8 concerns the CWU's representation of subpostmasters.  
 9 When you worked as an assistant secretary, the CWU did  
 10 not represent the interests of subpostmasters; is that  
 11 right?  
 12 **A.** No, that's correct.  
 13 **Q.** Do you know why it was that subpostmasters were not  
 14 admitted as members of the CWU at that stage?  
 15 **A.** Because they were members of the National Federation of  
 16 SubPostmasters and that was -- so, within the Post  
 17 Office at the time, there were number of different  
 18 unions. There was the Post Office Engineering Union,  
 19 who were responsible for light and heat and vans; there  
 20 was the Communication Workers Union who were responsible  
 21 for directly employed Post Office staff working on Post  
 22 Office -- now Royal Mail -- issues as well; there was  
 23 the Communication Managers Association, who were  
 24 responsible for representing managers; and there was the  
 25 National Federation of SubPostmasters who were

65

1 employed staff, whereas my understanding at the time is  
 2 the contracts between the Post Office and subpostmasters  
 3 would remunerate subpostmasters based on the  
 4 transactions they did, which are two distinctly  
 5 different things. They're not aligned.  
 6 **Q.** Now, there came a time when the CWU started to recruit  
 7 subpostmasters as members of the union. Do you recall  
 8 when efforts were first made to recruit subpostmasters?  
 9 **A.** Only from evidence that's been given to me in this and  
 10 from my involvement on the National Executive Council  
 11 for the union. I think that was around the 2014/2015.  
 12 **Q.** Now, you've been shown a printout from the CWU website  
 13 which tends to indicate that the union were actively  
 14 recruiting subpostmasters in October 2011. That's  
 15 NFSP00001463, please.  
 16 Thank you very much. If you look at the very bottom  
 17 of the page, please, you can see this is from where it's  
 18 drawn, so [www.cwu.org/postmasters](http://www.cwu.org/postmasters), and the date is  
 19 3 October 2011. If we could just scroll down, please,  
 20 thank you. So, in that first box, it identifies the  
 21 Chairman of what was called the CWU Postmasters & Agents  
 22 section, and that's Mr Nippi Singh.  
 23 **A.** Mm.  
 24 **Q.** A little further down, please. Thank you. There's  
 25 a further box which identifies Mark Baker as the Vice

67

1 responsible for representing subpostmasters.  
 2 And so, if you fell into one of those categories,  
 3 the recognition of the employer for anybody employed in  
 4 those categories were to -- within those unions. So the  
 5 reason we didn't represent them is because we didn't  
 6 have recognition agreements and they joined the National  
 7 Federation of SubPostmasters.  
 8 **Q.** In your statement you say that you don't consider the  
 9 interests of subpostmasters and Post Office employees  
 10 necessarily to be aligned; is that right?  
 11 **A.** I did say that, yeah.  
 12 **Q.** What do you mean by that?  
 13 **A.** Well, because subpostmasters -- so -- Crown Office  
 14 staff, Post Office staff, were directly employed  
 15 employees, of the Post Office. Subpostmasters, to my  
 16 knowledge/recollection, worked on a contractual basis as  
 17 private business people, for want of a better phrase,  
 18 and had a private contract with the Post Office. So  
 19 there were two distinct, different groups: one were  
 20 directly employed workers and the other were privately  
 21 employed -- private businesses, and directly engaged, if  
 22 you like, as agents by the Post Office. So two separate  
 23 interests.  
 24 So we would negotiate and argue, for example, for  
 25 increased wages and terms and conditions for directly

66

1 Chairman of the same section. So it appears that, by  
 2 this time in October 2011, the CWU had established  
 3 a separate section to represent the interests of  
 4 postmasters and agents. Do you think that's a fair --  
 5 **A.** Yeah.  
 6 **Q.** -- inference from what we can see here? Do you recall  
 7 the circumstances in which these two individuals,  
 8 Mr Baker and Mr Singh, joined the Communication Workers  
 9 Union?  
 10 **A.** No, I wasn't involved in that but, from discussions,  
 11 I was -- so the final decision on allowing them -- or  
 12 setting up a subpostmaster section and actively trying  
 13 to recruit them was a decision of the National Executive  
 14 Council, of which I was a member. And my understanding  
 15 from memory, although I'm talking about nine, ten years  
 16 ago now, is that they had a sort of dissatisfaction with  
 17 the National Federation of SubPostmasters, then  
 18 a dissatisfaction with the direction that Post Office  
 19 was going, in a general sense, and my understanding was  
 20 they didn't have much faith in the National Federation  
 21 of SubPostmasters representing them, which is why they  
 22 approached us, and then we went "Well, if you're going  
 23 to approach us, then we're set up a section, we're going  
 24 to try to recruit more people from that cohort into the  
 25 union".

68

1 Q. Now, in your statement, you say that within of the roles  
 2 of the union is to regulate tension between its members;  
 3 is that right?  
 4 A. Between its members and the employer.  
 5 Q. Well, between members and employer but between -- but  
 6 internally between members, as well; is that not right?  
 7 A. Do I say that in my statement?  
 8 Q. If we go, please, to page 3, paragraph 8b. Thank you.  
 9 So in the preceding paragraph you describe the  
 10 objectives of the union and you go on to say here at  
 11 (b):  
 12 "[They are] To regulate the tensions between members  
 13 and their employers, and between members."  
 14 A. Yeah.  
 15 Q. Do you consider that tensions existed or exist between  
 16 subpostmasters and Post Office employees, bearing in  
 17 mind what you said about their interests not necessarily  
 18 being aligned?  
 19 A. No. No, I don't think there's a tension. We can  
 20 represent and do represent separate groups of workers to  
 21 the employers who are not necessarily in the same  
 22 workplace, not necessarily in the same, if you like,  
 23 industry. So no, it's -- I don't believe that, no.  
 24 Q. Thank you. Another related topic, please, which  
 25 concerns the relationship between the Communication

69

1 the years, we had -- we do have general discussions with  
 2 other unions and representative bodies about whether or  
 3 not there is common ground or there is the possibility  
 4 of us merging or are there any common interests.  
 5 So yeah, that approach -- or whether they approached  
 6 us or we approached them, I don't know because I was not  
 7 involved but I'm generally aware that a discussion took  
 8 place.  
 9 Q. Thank you. Could we please bring up CWU00000076. Thank  
 10 you. As you can see, this is a report to the National  
 11 Executive Council on 18 June 2015, for consideration at  
 12 a meeting scheduled for 25 June. Were a member of the  
 13 NEC at this time?  
 14 A. Correct, I was.  
 15 Q. Did you receive a copy of this report?  
 16 A. I would have done.  
 17 Q. You would have read it, presumably, at the time?  
 18 A. Yes.  
 19 Q. Now, to place this in context, can we please take a look  
 20 at the heading and introduction. So this report relates  
 21 to the NFSP, Post Office Limited and CWU. Under  
 22 "Introduction", it reads:  
 23 "It is prudent for us to consider the challenges,  
 24 opportunities and options for the CWU given the  
 25 likelihood that the NFSP special conference next month

71

1 Workers Union and the National Federation of  
 2 SubPostmasters. In your statement, you say, at the time  
 3 when you worked as assistant secretary, the two  
 4 organisations held equal status; is that fair?  
 5 A. They were both recognised by the employer, by the Post  
 6 Office, as having negotiating rights. So, yeah, equal  
 7 status insofar as they could both directly represent to  
 8 the Post Office the concerns of their members.  
 9 Q. You said you would occasionally communicate on key  
 10 issues and priorities but you did not collaborate on  
 11 projects or member representation; is that right?  
 12 A. That's correct.  
 13 Q. Now, there came a time when the Federation and the union  
 14 discussed a possible merger; do you recall that?  
 15 A. I don't.  
 16 Q. It may assist you, please, if we --  
 17 A. Sorry, generally, yes. I think we were approached by  
 18 the then General Secretary, I think at the time was --  
 19 I think at the time was George Thomson, but it wasn't my  
 20 day job so that approach would have been through Andy  
 21 Furey and the then General Secretary, I think, Billy  
 22 Hayes. So only in the sense that we were also  
 23 approached once by the Society of Telecom Executives,  
 24 which was the managers in the -- in BT, where we also  
 25 have members and, over the years -- excuse me -- over

70

1 decides not to enter into a Memorandum of Understanding  
 2 with the Post Office in preference to a transfer of  
 3 engagements to us or the National Federation of Retail  
 4 Newsagents."  
 5 This is a reference, is it not, to what later became  
 6 known as the Grant Framework Agreement, that was  
 7 concluded between the NFSP and the Post Office in July  
 8 of that year; are you aware of that?  
 9 A. I am not. I'm not aware of that last point. As I say,  
 10 my understanding was, along with other unions over  
 11 a period of time, the NFSP had approached us, as well as  
 12 others, including the National Federation of Retail  
 13 Newsagents here, to understand or identify what scope  
 14 there was for the two organisations to come together,  
 15 but I wasn't aware of that -- of that other point, as  
 16 I say because that was no longer my area of  
 17 responsibility.  
 18 Q. What this appears to suggest is that that approach, that  
 19 you say you received from the NFSP, seems to have come  
 20 at a time when they were also in negotiations with the  
 21 Post Office over a possible long-term partnership and  
 22 a funding arrangement; is that fair?  
 23 A. Yeah, I think that's fair. I mean, I referenced  
 24 discussions we'd had with other unions about potentially  
 25 merging with the CWU. But what happens is, if

72

1 an organisation thinks there's a need to merge, for want  
2 of a better phrase, they'll keep a number of options  
3 open, they'll have discussions with a number of  
4 partners, if you like, and then to a decision about  
5 which they think is the possession, fit for them. So,  
6 yeah, they were talking to us, talking to the National  
7 Federation of Retail Newsagents and talking with the  
8 Post Office, as I understand it, new arrangements which  
9 led to the contract that you just referred to.

10 **Q.** Now, it appears that it was the expectation of the CWU  
11 that the NFSP would not enter into that agreement. Do  
12 you know why that was their expectation at the time?

13 **A.** No, my sense for that, having been involved in  
14 discussions with other unions over a period of time, is  
15 you get a feel whether you're just, for want of a better  
16 phase, as a bargaining chip for them to go somewhere  
17 else, so they will say to whoever their preferred  
18 partner is "These are offering us a better deal, we're  
19 in discussions with this other group as well, so the  
20 deal had better be good from you", whoever you are,  
21 "because we've got other options".

22 Once you go through the sort of negotiation process  
23 on that, which I have been involved in but not the  
24 Federation, you start to get a feel about whether  
25 they're serious about merging with you, or actually,

73

1 "The exclusivity accorded to the NFSP does not  
2 appear to be consistent with particular legal  
3 obligations, especially as it necessarily means that CWU  
4 represented postmasters are excluded from arrangements  
5 which determine their contractual undertakings."

6 Do you consider that the CWU was hampered in its  
7 ability effectively to represent the interests of  
8 subpostmasters by reason of the fact that they were not  
9 formally recognised by the Post Office for collective  
10 bargaining purposes?

11 **A.** Yeah, I think -- so, in reaching out to anybody who  
12 wants to be a member of any union or the CWU this say to  
13 them "This is what we can do on your behalf", so we can  
14 say to directly employed staff, "What we can do on your  
15 behalf is go direct to the employer on pay, terms,  
16 conditions, that directly affect you. We are recognised  
17 by the employer to bargain on your behalf".

18 I believe -- my understanding, as of today, we still  
19 don't have a recognition agreement with the Post Office  
20 for our subpostmasters' section and, therefore, the  
21 offer that you make to potential members, one of the  
22 first questions they would ask is "What can you do on  
23 our behalf", and we have to say to them "We're not  
24 recognised by the Post Office to directly represent your  
25 interests".

75

1 they're keeping their options open in case what they  
2 really want falls apart, and then they've got you as  
3 a back-up.

4 **Q.** Now, if we could move on, please, to page 3 and we see  
5 this issue addressed in some more detail under the  
6 heading "Relationship issues". Firstly, "With POL", the  
7 first issue dealt with. That reads:

8 "There was an exchange of correspondence with POL in  
9 October 2014. This followed receipt by us of legal  
10 advice on the nature of POL's relationship with the NFSP  
11 following the removal of the Federation from the list of  
12 accredited trade unions."

13 Just pausing there, do you know why it was that the  
14 NFSP had been removed from the list of accredited trade  
15 unions?

16 **A.** I don't know the specific reason that would have been  
17 given by the CEO, no.

18 **Q.** If we go on, please, to the second paragraph, it reads:  
19 "We ... need to return to that correspondence in the  
20 event of the merger process being terminated."

21 So that's presumably a reference to the possible  
22 merger between the CWU and the NFSP.

23 **A.** I assume that -- I'm assuming that's what that refers  
24 to.

25 **Q.** The:

74

1 So, in answer, not being recognised by the Post  
2 Office to directly represent their interests is  
3 a hindrance to recruitment of that cohort, in my view.  
4 Sorry.

5 **Q.** Well, it may be a hindrance to recruitment, is it also  
6 a hindrance to effective representation?

7 **A.** Insofar as you cannot directly go to the Post Office,  
8 yes, it is.

9 **Q.** Do you know the reasons which were given by the Post  
10 Office for refusing to recognise the CWU --

11 **A.** No.

12 **Q.** -- as representative?

13 **A.** I don't.

14 **Q.** What, if any, steps has the union taken to address this?

15 **A.** I don't know. As I think I've said in my statements,  
16 since 2002, not my day job. Andy Furey would be in the  
17 frontline of making that representation to the Post  
18 Office.

19 **Q.** Now, in the second half of this page we can see the  
20 heading "Relationship issues ... With the NFSP as  
21 reconstituted under an MoU". It reads:

22 "We have received a copy of the much-discussed  
23 proposed Memorandum of Understanding between [Post  
24 Office Limited] and the NFSP. This is attached.

25 "The most salient points of this document can be

76

1 summarised as follows ..."

2 We'll look at some of them now, please. The first

3 one summarising paragraph 2 of the draft MOU:

4 "The NFSP will reconstitute itself as a trade

5 association or similar organisation."

6 Are you able to explain, please, the distinction

7 between a trade union and a trade association?

8 **A.** Um --

9 **Q.** What the significance of that would be in --

10 **A.** I understand what I know and believe a trade union to be

11 and what its purpose is, and a trade association or

12 similar organisation is there to protect the interests,

13 as I understand it, of the business or the business

14 owners, as opposed to all the workers who work in any

15 particular trade or business, which is why I suspect the

16 Certification Officer no longer includes the National

17 Federation of SubPostmasters as an accredited trade

18 union, because the Trade Union Certification Officer has

19 a strict set of criteria about what a trade union is,

20 and them not being listed as a trade union means that

21 they fall outside of that remit. So there is

22 a fundamental difference in protecting a business or

23 protecting a trade, than there is protecting directly

24 employed workers.

25 **Q.** The second bullet point, please, states that:

77

1 subscription income paid by their members. This

2 document shows that had position for the Federation was

3 to cease and they were to be funded directly by

4 a payment from the employer or the Post Office.

5 **Q.** Now, the document goes on to suggest that there were

6 likely to be some conditions attached to the grant of

7 this funding. If we can scroll down, please. Thank

8 you. So these are referenced as part of paragraph 6,

9 the first bullet point identifies paragraph 6 as

10 a review mechanism for the agreement and states:

11 "At paragraph 6c it says that the 'NFSP has not

12 engaged in activities which are actively detrimental to

13 the [Post Office]' -- but does not define what these

14 are."

15 The paragraph goes on to state that:

16 "... 'the Post Office acknowledges that the NFSP ...

17 must have freedom to undertake activities that protect

18 and represent their members' views. In undertaking

19 these activities, the NFSP agree that it will not

20 introduce commercial risk to the [Post Office]'."

21 The author observes this a "very wide potential

22 prohibition". Then:

23 "... while [Post Office] remains publicly owned, the

24 proposed TTIP treaty ..."

25 Do you know what that is a reference to: the TTIP

79

1 "Under the MOU the, the [Post Office] (not [Post

2 Office Limited]) will provide funding of 'up to

3 £1.5 million' per annum from 2015/16'."

4 It goes on to explain that the actual amount would

5 depend on the difference between the revenues derived

6 from the current membership model and the income stream

7 and what they actually received, but it goes on to state

8 at the bottom:

9 "In discussion, CWU representatives have described

10 adoption of the MOU as meaning an inevitable cessation

11 of subscription income -- and no one [perhaps it should

12 read 'from', rather than 'form'] the NFSP has

13 disagreed."

14 So, essentially, a proposal to provide funding of up

15 to £1.5 million.

16 If we could go over the page, please, the second

17 bullet point there reads:

18 "'PO will provide additional funding of no less than

19 £1 million per annum as a budget for grants to the

20 NFSP'. Thus the annual gross value of the MOU is up to

21 £2.5 million per annum."

22 Was a funding arrangement of this nature usual for

23 a trade union or trade organisation to your knowledge?

24 **A.** It's not usual for a trade union. Absolutely not.

25 Trade unions are almost predominantly funded by

78

1 treaty?

2 **A.** I think that was an international agreement around how

3 businesses transact standards that they had to operate

4 under, from memory.

5 **Q.** "... [that] could be prayed in aid as the arbiter of

6 'commercial risk' were the treaty to be ratified", it

7 suggests.

8 It goes on to say there are dispute management

9 procedures, which are reasonably transparent and have

10 a degree of independence but, in the final bullet point,

11 please:

12 "Paragraph 6's final subparagraph says 'should the

13 NFSP disclose [Post Office] information that is

14 confidential or commercially sensitive (as defined in

15 the confidentiality agreement) or encouragement

16 [presumably was meant to read 'encourage']

17 subpostmasters to take action which conflicts with their

18 contractual obligations, except where all other avenues

19 of dispute resolution have been exhausted, this will be

20 deemed a material breach of this agreement."

21 So, essentially, the NEC being notified there that

22 there's a new arrangement for funding to be made but

23 that funding will come with certain conditions; is that

24 fair?

25 **A.** That's my understanding of --

80

1 Q. Now, if we could turn to the following page, please, we  
2 can see the overall conclusion reached by the CWU --  
3 forgive me, if you scroll up a little bit, thank you.

4 So, as to the effect of these provisions, the report  
5 provided:

6 "There can be no doubt that the MOU represents the  
7 abandonment by the Federation of any meaningful  
8 independence. Our relationship with them and the  
9 employer would necessarily change as a consequence, as  
10 the CWU would be the only organisation of standing able  
11 to offer postmasters effective representation."

12 Now, reading that, it rather suggests that the CWU  
13 believed at that time that the NFSP had compromised or  
14 was going to compromise its independence in reaching  
15 this agreement; is that fair?

16 A. That's fair.

17 Q. And that the CWU believed that it was the only  
18 organisation which could offer effective representation  
19 to subpostmasters?

20 A. That was our view, yes.

21 Q. Now, it's a related issue but I'd like to deal now,  
22 please, with how the CWU responded to the emerging  
23 scandal. If we can please bring up your witness  
24 statement at page, that's WITN06370200.

25 Thank you. Page 10, please, paragraph 43, you say  
81

1 which Andy Furey is a national officer -- I used to be  
2 a national officer of the Postal Executive from '97 to  
3 2002.

4 So those issues are dealt with not by the National  
5 Executive Council but are dealt with by the industrial  
6 executive that I don't sit on and is not part of my  
7 responsibilities. So my statement was in response to  
8 the specific question that I was asked by the Inquiry  
9 Team: did I take any steps between 2009 and 2019 in  
10 raising any concerns on the issue with those? And the  
11 answer is no because, as I've just explained, the remit  
12 for those was the then-Assistant Secretary couldn't --  
13 Assistant Secretary, Andy Furey, and the postal  
14 executive.

15 Q. The role of Assistant Secretary was not as senior as  
16 Deputy General Secretary, was it, in terms of hierarchy?

17 A. In terms of the internal hierarchy of the union,  
18 correct.

19 Q. Do you not think this was an issue which required the  
20 involvement of more senior leadership?

21 A. No, because that isn't the structure. So the  
22 responsibilities of the national officials are laid out  
23 within the rule book. Mine is to assist the General  
24 Secretary, and the Postal Assistant Secretaries and the  
25 Postal Executive have sole authority over the industrial  
83

1 this:

2 "I did not take any steps between 2009 and 2019  
3 (inclusive) in raising any concerns regarding the  
4 integrity of the Horizon IT System with [Post Office  
5 Limited], the Government, the Shareholder  
6 Executive/UKGI, MPs, and peers or journalists as this  
7 issue no longer formed part of my remit to do so."

8 Now, just pausing there, for a minute, you've just  
9 told us that, as a member of the NEC, you received  
10 a report saying that the NFSP was compromised or was  
11 compromising its independence; is that correct?

12 A. That's correct.

13 Q. Do you not think that you had a duty to take forward  
14 these issues on behalf of subpostmasters who were not  
15 being effectively represented, in your view, by their  
16 trade association?

17 A. So the question was: did I take any steps? The answer  
18 was I didn't because it was not my job to do so. The  
19 CWU structure, at national level, is we have a National  
20 Executive Council, which I sit on, which is responsible  
21 for finance, admin functions, things like whether or not  
22 we agree to merge with another union to form a union,  
23 industrial issues, day-to-day industrial issues, which  
24 the Post Office and counter clerks are dealt with by  
25 a separate executive called the Postal Executive, of  
82

1 issues with the employers, Royal Mail, Post Office, et  
2 cetera.

3 MS HODGE: Thank you, sir. I think the stenographer would  
4 like a short break, please. I have very few further  
5 questions for this witness but I think there may be  
6 a couple of questions from the recognised legal  
7 representatives.

8 SIR WYN WILLIAMS: Yes, that's fine. We will take a break  
9 until 12.10.

10 MS HODGE: Thank you.

11 (12.00 noon)

(A short break)

13 (12.10 pm)

14 MS HODGE: Good afternoon, sir. Can you see and hear us?

15 SIR WYN WILLIAMS: Yes, thank you.

16 MS HODGE: Thank you, sir.

17 Mr Kearns, you've said in your statement and in your  
18 evidence that you simply weren't aware that  
19 subpostmasters and Post Office employees were being  
20 prosecuted in reliance on data shown by Horizon; is that  
21 right, at least for a substantial period of time with  
22 which we're concerned?

23 A. Apart from when it became public, yes.

24 Q. Do you recall when you first did become aware?

25 A. I don't recall, no.

84

1 Q. I wonder, please, if we could look, again, at that  
2 report to the NEC dated 18 June 2015, that's  
3 CWU00000076. This was the report we were looking at  
4 just shortly before the break, insofar as it related to  
5 the changes to the constitution of the National  
6 Federation of SubPostmasters and its funding arrangement  
7 with the Post Office. It also contained an update on  
8 Horizon. We can see that, please, on the first page.,  
9 under the heading "Horizon". It said this:

10 "As reported in LTB 269/15 ..."

11 Is that a reference to letter to branch, "LTB"?

12 A. "LTB", letter to branch.

13 Q. "... issued on 21 April, concern about the approach  
14 adopted by [Post Office Limited] to the alleged problems  
15 caused to postmasters by the Horizon operating system  
16 has now been raised directly with the Prime Minister.

17 "There has been a pause in political activity on  
18 this during the General Election period, but POL's lack  
19 of engagement with the mediation process, the attempt to  
20 suppress a report by Second Sight -- the company engaged  
21 to investigate alleged shortcomings of Horizon -- and  
22 continuing concerns of both CWU and NFSP postmasters  
23 mean that the issue will not subside."

24 Now, it goes on to read, please, over the page:

25 "The 'Justice for Subpostmasters Alliance'

85

1 quickly culminate in [Post Office Limited] terminating  
2 the contract of one member and forcibly making the other  
3 pay back his losses by deduction to pay."

4 Now, if we just step back for a minute, this is  
5 obviously in a report to you as a member of the NEC --  
6 that's correct -- bringing to your attention concerns  
7 about Horizon; is that fair?

8 A. Yes, it references --

9 Q. Concerns which the CWU shared at that stage, or by that  
10 stage. These were concerns that affected both former  
11 subpostmasters and current subpostmasters, some of whom  
12 were members of the CWU at that time; isn't that right?

13 A. Yes, I mean -- well, we had a subpostmaster section. So  
14 yes.

15 Q. Given what you were being told in a report such as this,  
16 should you have done more, do you think, to raise  
17 awareness within Government and to lend your support to  
18 the campaign to expose the failings of Horizon?

19 A. As I said before the break, that was not my area of  
20 responsibility. Our rule book, which is -- under which  
21 the CWU operates, that responsibility is the  
22 responsibility of the Postal Executive and the officers  
23 of the Postal Executive, in this case Andy Furey, to  
24 deal with.

25 Q. Would it be fair, do you think, to say that, in essence,

87

1 organisation has been set up by mostly ex-postmasters  
2 who believe that they have been unfairly treated.  
3 However, the key individual in JFSA, Alan Bates, is not  
4 currently in contact with the CWU parties' branch."

5 This suggests at least that, at this stage, Mr Bates  
6 hadn't approached the CWU directly for support for his  
7 campaign; is that correct?

8 A. Yes, that's what it says, yes --

9 Q. On the face of it, of what we have before us.

10 A. Yes.

11 Q. The second paragraph goes on to read:

12 "[Post Office Limited's] position has essentially  
13 been based on the principle that the Horizon system  
14 cannot go wrong. However, this is not what we, NFSP and  
15 JFSA are saying. Our position is that however robust  
16 a computer system there can be and have been problems."

17 What this appears to be is an acknowledgement by the  
18 CWU that there have been problems with the Horizon  
19 system; is that fair?

20 A. That's what that suggests, yes.

21 Q. Now, the final paragraph reads:

22 "Due to the collapse of the Mediation Scheme at  
23 least two of our members will almost certainly now have  
24 normal [Post Office] disciplinary action taken against  
25 them (because they are still serving), which will

86

1 the CWU left the group litigants to bear the burden of  
2 challenging the integrity of Horizon?

3 A. Given that I had no involvement with that issue at that  
4 time, I couldn't say I could agree with that statement.

5 I'm not in a position to agree with that statement  
6 because I don't know what the executive and the officer  
7 concerned were doing on a daily basis on this issue.

8 MS HODGE: Thank you.

9 Sir, I've no further questions for this witness.

10 Before the recognised legal representatives ask  
11 their questions, is there anything you wish to ask, sir?

12 SIR WYN WILLIAMS: No, thank you. No.

13 MS HODGE: Forgive me, sir. If we just pause for one  
14 minute.

15 SIR WYN WILLIAMS: Yes. *(Pause)*

16 MS HODGE: Sorry, sir, we've had a late request for  
17 a further document to be put to the witness. It may be  
18 that the way we can approach it is to let Mr Stein, if  
19 you have questions, to go first.

20 I think the other representative is Ms Watt.

21 SIR WYN WILLIAMS: Yes.

22 MS HODGE: We can review the position in relation to that  
23 document to ensure that the witness is given a fair  
24 opportunity to review it before he is asked any  
25 questions.

88

1 **SIR WYN WILLIAMS:** Sorry, we're going to hear from Mr Stein  
2 and then Ms Watt, and then review whether we need to ask  
3 any more questions; is that it?

4 **MS HODGE:** Well, sir, yes. I mean, my proposal is that we  
5 proceed with questions now whilst we review in the  
6 background what the effect of this document is and then  
7 we will perhaps see where we are in the next 15 minutes.

8 **SIR WYN WILLIAMS:** Yes, that's fine.

9 **MS HODGE:** Thank you.

10 **MR STEIN:** Sir, I've no objection, of course, to us  
11 proceeding in that way. The difficulty though is, if  
12 the document is released and I need to see and it and  
13 consider it, for the purpose of any further questions,  
14 then I may beg an indulgence, which is to return to any  
15 questions we may have arising out of that document.

16 But on that basis, sir, would you mind if I then go  
17 ahead with our questions for Mr Kearns?

18 **SIR WYN WILLIAMS:** No, no, carry on.

19 **MR STEIN:** I'm very grateful.

20 **Questioned by MR STEIN**

21 **MR STEIN:** Mr Kearns, you're a longstanding employee of the  
22 CWU, the Communication Workers Union, you're employed in  
23 an elected position as the Senior Deputy General  
24 Secretary of the CWU; is that correct?

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

89

1 Help us understand, with your own work within the  
2 trade union movement, is that a normal arrangement with  
3 a representative body working on behalf of, in this  
4 case, subpostmasters?

5 **A.** No. I wasn't aware of that specific but, having  
6 listened to what you said, I've never come across  
7 a representative body/trade union, that has such clauses  
8 in it. That doesn't sit comfortably people with me as  
9 a trade unionist, that you could enter into that and  
10 claim to be a representative body.

11 **Q.** It may be, in some ways, obvious but what's the problem  
12 with entering into an agreement to not criticise the  
13 employer of the people you represent; what's the  
14 difficulty?

15 **A.** Well, you would take away your independence, you take  
16 away your ability to challenge the direction that the  
17 employer or the company is going in, because you think  
18 it's detrimental to both the members you represent. In  
19 the case of ourselves as the CWU, with recent examples  
20 of Royal Mail, the service they're providing to the  
21 customer, to the public. If you're unable to challenge  
22 that, it strikes me that it's more like a business  
23 partnership than it is a representative body for the  
24 individuals that make up the organisation.

25 **Q.** Can I then elide that to a question that was asked by

91

1 **Q.** You may or may not know my name is Sam Stein,  
2 I represent a large number of subpostmasters/mistresses  
3 and employees working in branch offices of the Post  
4 Office.

5 I've just got a couple of questions, using, first of  
6 all, your experience, if may, as part of the trade union  
7 movement. In the judgment, judgment number 3 in the  
8 High Court -- I'm not sure if you have this but I'll  
9 read out the relevant part -- a judgment by Mr Justice  
10 Fraser, now Lord Justice Fraser, he said this at  
11 paragraph 1120 of judgment 3 that:

12 "The National Federation of SubPostmasters is not  
13 independent of the Post Office."

14 He went on to say:

15 "The Post Office also has a highly detailed funding  
16 agreement with the NFSP that would entitle the Post  
17 Office to claw back funds already paid to the NFSP if it  
18 does anything that would damage the Post Office's  
19 reputation, including supporting the subpostmasters in  
20 this litigation."

21 So he was making the points, which is the NFSP is  
22 not independent of the Post Office, there's a funding  
23 agreement with the NFSP, allowing the Post Office to  
24 claw back funds paid to the NFSP if the NFSP anything  
25 that would damage the Post Office's reputation.

90

1 Ms Hodge that concerned and touched on collective  
2 bargaining. Now, you refer to collective bargaining at  
3 paragraph 7 of your statement, where you say you must  
4 add that:

5 "The CWU has long called for union recognition, for  
6 collective bargaining purposes, for subpostmasters but  
7 POL has consistently refused to grant this."

8 You've added in your evidence you still believe  
9 that's the position today; is that correct?

10 **A.** That's my understanding of it.

11 **Q.** Now, paragraph 11 says this:

12 "We engage in collective bargaining processes with  
13 several employers on issues such as pay, terms and  
14 conditions of employment."

15 So Ms Hodge was seeking to establish with you what,  
16 if you like, are the advantages of collective bargaining  
17 on behalf of members of the CWU. You refer to it there  
18 as being discussions with employers on issues such as  
19 pay, terms and conditions of employment. What would be  
20 the effect of having what I am going to call a shackle  
21 on a representative body to not criticise the employer,  
22 in relation to collective bargaining?

23 **A.** My view is that the shackle would be that you're not  
24 able to effectively represent the members of that  
25 organisation and because -- well, if you're restricted,

92

1 for want of a better phrase, in criticism, such --  
 2 I give an example. You take the -- we had a major  
 3 industrial dispute with Royal Mail some years ago --  
 4 I understand not everybody likes this but we took major  
 5 industrial action which disrupted the service, partly  
 6 because we didn't think our members were being treated  
 7 with due respect, partly because -- the reason for that  
 8 was because the direction that Royal Mail was setting  
 9 out as a business, and therefore the industrial action  
 10 that we eventually took was, if you like, for want of  
 11 a better phrase, a protest against that, to defend our  
 12 members against job losses, so on and so forth.

13 If you're restricted from being able to make that  
 14 criticism then, well, you're not able to effectively  
 15 represent those individuals who make up that  
 16 organisation, is how I would see it.

17 **Q.** Now you've mentioned to Ms Hodge that the position of  
 18 Mr Furey. Mr Furey, if I've got it right, is the  
 19 Secretary to the CWU but also is the CWU's national  
 20 officer for postmasters, CWU members who are working in  
 21 Post Office branches and working in the wider Post  
 22 Office; is that correct?

23 **A.** That's correct.

24 **Q.** Right. So Mr Furey's title is, essentially, to deal  
 25 with all such matters in relation to CWU membership,

93

1 **A.** Correct.

2 **MR STEIN:** Thank you, Mr Kearns.

3 **SIR WYN WILLIAMS:** Ms Watt?

4 **Questioned by MS WATT**

5 **MS WATT:** Good afternoon, can you hear and see me?

6 Thank you, Mr Kearns. I'm just diagonally behind  
 7 Mr Stein there. Yes, we have this problem every time  
 8 I speak. Thank you.

9 I have some questions for you on behalf of the  
 10 National Federation of SubPostmasters and I think we  
 11 actually spoke before when you were here the last time.  
 12 Your union would have had hundreds, perhaps, if not  
 13 thousands, of members working in what was then hundreds  
 14 of Crown Office branches using Horizon during the 2000s  
 15 when the scandal was emerging; that's correct, isn't it?

16 **A.** Yes, my recollection, from around 2000, I think we have  
 17 maybe 9,000/9,500 members. That's severely diminished  
 18 through the 2000s and to today because of --

19 **Q.** So A lot of members --

20 **A.** Yeah.

21 **Q.** -- many, many members --

22 **A.** Yeah, thousands.

23 **Q.** -- working in these Crown Office post offices?

24 **A.** Correct, yeah.

25 **Q.** So you've accepted earlier this morning that there would

95

1 subpostmasters, people employed in branches and working  
 2 within the Post Office itself; is that right?

3 **A.** Correct, his title is the Assistant Secretary, Clerical  
 4 Cash Handling so all those issues which includes Crown  
 5 Post Office staff and administrative staff in  
 6 employment --

7 **Q.** Which is why, in your evidence, you've made it clear  
 8 that, since, I think, around 2002, that's not been your  
 9 direct area of responsibility, it's been Mr Furey's; is  
 10 that correct?

11 **A.** March 2002, to be specific.

12 **Q.** I'm grateful. Then turning to Mr Furey, are you aware  
 13 that he has given evidence before select committees in  
 14 relation to the CWU subpostmaster branch employee  
 15 membership?

16 **A.** I am.

17 **Q.** Given evidence at least on two occasions that I can find  
 18 on a quick search, is that right, and been interviewed  
 19 generally in regards the Post Office and actions taken  
 20 by the management of the Post Office and is quoted often  
 21 in the press?

22 **A.** Yes.

23 **Q.** Fairly obviously, Mr Furey would be someone who could  
 24 take any other matters further if there were any other  
 25 questions to be asked by the Inquiry?

94

1 have been prosecutions of Crown Office employees, you  
 2 said the CWU didn't know anything about these  
 3 prosecutions because you didn't provide legal funding  
 4 for criminal representation and you've said, as  
 5 I understand it, you don't think you could would or  
 6 should have known about these prosecutions at the time;  
 7 is that correct?

8 **A.** Yeah, they were not raised with us at national level.  
 9 We were not aware of them. I mean, in terms of me  
 10 saying I was aware of them, I was aware of them because  
 11 I was handed a piece of paper that details prosecutions.  
 12 That's how I'm aware of them. I think also, in some of  
 13 the questions I was given in preparing my statement was  
 14 a question about what Legal Services the union offers to  
 15 its members, and we don't offer Legal Services for  
 16 criminal prosecutions.

17 **Q.** But, as a generality, and this is over time -- and  
 18 I think Sir Alan Bates first raising of the point is  
 19 around 2003/2004, and then everything gathers momentum  
 20 over the years -- there were these increasing voices  
 21 about problems with Horizon and prosecutions and this  
 22 was being reporting in the media, so my question is how  
 23 or why could the CWU, even if you yourself in your role,  
 24 not understand that issues with Horizon and  
 25 prosecutions, given they were being talked about in the

96



1 context of subpostmasters, might be able well be  
 2 involving your members, could also be affecting them?  
 3 **A.** As I say, from March 2002 -- so the period you refer to,  
 4 2003/2004 -- from March 2002, if such incidents  
 5 occurred, they would go to Andy Furey and his department  
 6 to deal with.  
 7 **Q.** I mean, I understand it wasn't you personally. I'm  
 8 talking about the union as a whole, looking at its  
 9 members and issues that were coming into the public  
 10 domain, were in the public domain. How is it that the  
 11 union itself couldn't understand that those issues might  
 12 be affecting their own members, even if they weren't  
 13 hearing about actual criminal prosecutions of their own  
 14 members?  
 15 **A.** I mean, I think the point I've made and tried to make is  
 16 that the union is made up of a number of sections and  
 17 those elected to the top of the union have completely  
 18 different responsibilities. So the responsibilities for  
 19 dealing with any issues that would arise for our members  
 20 directly employed by Crown Offices would go to and rest  
 21 with what I would call the Postal Executive, which is --  
 22 under our rule book, which has the sole responsibility  
 23 for dealing with those issues. So it's not that the  
 24 union in total would be aware of all of those issues  
 25 because it's not why -- everyone employed by the union

97

1 **Q.** Just to --  
 2 **SIR WYN WILLIAMS:** Let me just ask you, Mr Kearns. Clearly,  
 3 I understand what you're telling me about the  
 4 demarcation of responsibility but would you expect that  
 5 the relevant heads of the section which deals with Post  
 6 Office employees and subpostmasters would have had  
 7 information about the numbers of people who were either  
 8 been prosecuted or dismissed on the strength of  
 9 information from Horizon?  
 10 **A.** If that information somehow was given to them, either by  
 11 the Post Office or by our reps or members.  
 12 **SIR WYN WILLIAMS:** Well, when you say "somehow", were there  
 13 any processes in place, so far as you know -- perhaps  
 14 you don't know -- which would allow information such as  
 15 I've just suggested to you to go up the ladder, from the  
 16 local reps, where no doubt it will have started, to the  
 17 senior people at the head of the relevant section?  
 18 **A.** If those were issues of concern to our representatives  
 19 at local level, area level, regional level, they would  
 20 be passed up through briefings and meetings that our  
 21 executive and national officers would have with those  
 22 representatives on a regular basis. So, if those were  
 23 issues of concern, then, yes, that would be the process  
 24 through the procedure --  
 25 **SIR WYN WILLIAMS:** Without wishing to put words in your

99

1 is not employed to deal with everything that the union  
 2 faces.  
 3 So individuals and elected groups are responsible  
 4 for specific, different aspects of the work we  
 5 undertake. So we have a nationally elected executive  
 6 that deals with all issues relating to our members  
 7 employed within the postal industry, which includes the  
 8 Post Office, and we have a Lead Assistant Secretary who  
 9 deal with various businesses, in this case my  
 10 responsibility up until March 2002, and then Andy  
 11 Furey's responsibility.  
 12 **Q.** So would it be fair to say that the CWU, whether it was  
 13 you or whether it was Andy Furey, but the CWU is joining  
 14 the list of a rather long line of people and  
 15 organisations who were simply incurious about Horizon?  
 16 **A.** No, I don't think that's fair to say.  
 17 **Q.** Well, you've said that you didn't know anything about it  
 18 and that, despite media coverage, no one was prompted to  
 19 look at the issue for CWU members. So I'm suggesting to  
 20 you that that is indeed being incurious?  
 21 **A.** Well, I don't think I said I didn't know anything about  
 22 it. I also, on a number of occasions, I've been quite  
 23 specific about where the responsibility lies in a large  
 24 trade union like ours to deal with these issues on  
 25 a day-to-day basis.

98

1 mouth, is this a fair summary: that you would expect  
 2 that, if local representatives were concerned about  
 3 issues such as prosecutions or dismissal on the strength  
 4 of Horizon, they would have ensured that it went up the  
 5 ladder to more senior people?  
 6 **A.** That's a fair summary, yes.  
 7 **SIR WYN WILLIAMS:** Fine. All right.  
 8 Sorry, Ms Watt.  
 9 **MS WATT:** Thank you, sir.  
 10 Just picking up and following on from that and  
 11 earlier questions, you were referring in some evidence  
 12 with Ms Hodge to the former NFSP members, such as Mark  
 13 Baker, coming over to the CWU because they were  
 14 dissatisfied with the NFSP. I think it's fair to say  
 15 it's a matter of public record on their part --  
 16 certainly, at least, Mark Baker's part -- that this was  
 17 largely to do with the satisfaction about the way in  
 18 which the issues on Horizon were being dealt with by the  
 19 NFSP.  
 20 Now, even if it was the case, for instance, that the  
 21 Post Office wouldn't talk to the CWU about  
 22 subpostmasters at the time -- this is around 2011 --  
 23 because they only wanted to deal with the NFSP on  
 24 subpostmasters, surely any concerns being brought to the  
 25 CWU by Mark Baker and others about Horizon would have

100

1 been another way that your union was alerted to problems  
 2 with Horizon that could be affecting your own Crown  
 3 Office members, and you could have raised it with the  
 4 Post Office then; would you accept that?  
 5 **A.** That would be the -- as I said earlier, that would -- if  
 6 Mark Baker has represented those to Andy Furey, who was  
 7 dealing with those issues in 2011, that would have been  
 8 a way of raising them with the Post Office, yes.  
 9 **Q.** But it just never bubbled up to the relevant surface of  
 10 the CWU; is that where we're --  
 11 **A.** Sorry, it didn't bubble up?  
 12 **Q.** Yeah, it didn't reach/go through those layers that you  
 13 described to the Chair there of how matters come up  
 14 through to the top of the CWU and perhaps then go to the  
 15 Post Office?  
 16 **A.** Well, again, I'm -- I know people might get fed up with  
 17 me repeating this but, after 2002, it wasn't my  
 18 responsibility, so I'm not aware of which issues bubbled  
 19 up, as you describe it, through that rep structure to  
 20 Andy Furey, and what then transpired after that.  
 21 **Q.** Did the Postal Executive or the CWU ever bring issues  
 22 about Horizon concerns and Crown Office employees to the  
 23 Executive Council of the CWU, that you can recall?  
 24 **A.** Not that I can recall.  
 25 **Q.** I've just got a couple more questions. I think you were

101

1 **Q.** We heard that.  
 2 **A.** -- members of the CWU. They were the Communication  
 3 Managers Association.  
 4 **Q.** Yes, we heard that. We have also heard much evidence  
 5 about the aggressive bullying and intimidating tactics  
 6 used by Investigators and Auditors and I just wanted to  
 7 ask what you have to say about that behaviour and what  
 8 the Inquiry has heard about the way in which Auditors  
 9 and Investigators operated?  
 10 **A.** So I only saw a snippet of one of the Post Office  
 11 investigation branches giving evidence. I've had  
 12 experience of the Post Office Investigation Branch, as  
 13 it was then in my day job, when I was a local rep.  
 14 Having represented people who have been accused of  
 15 theft, I do find their methods to be aggressive, I do  
 16 find their methods to be almost -- well, natural justice  
 17 is innocence until proven guilty; my experience of  
 18 sitting down alongside our members, facing the Post  
 19 Office Investigation Branch, is there's a strong belief  
 20 in the Post Office Investigation Branch where people are  
 21 guilty and they're there to ensure that there are  
 22 consequences to that.

23 I don't find it -- generally, my experience in the  
 24 past -- it's a long time since I've had any dealings  
 25 with Post Office Investigation Branch -- is I found them

103

1 just discussing there, towards the end of your evidence,  
 2 about self-employed subpostmasters and collective  
 3 bargaining. I think you've been discussing and you'd  
 4 agree that self-employed subpostmasters running small  
 5 businesses are quite a different beast to large-scale  
 6 groups of employees such as postal workers on collective  
 7 bargaining; would you agree with that?  
 8 **A.** Yeah, they are different groups.  
 9 **Q.** One final question. When I asked you questions on the  
 10 last time you appeared, you agreed it was likely that  
 11 Post Office employees, such as Auditors and others, were  
 12 or could have been members of the CWU. I think you'd  
 13 agree that would likely also include Investigators, as  
 14 well; would that be right?  
 15 **A.** When you say Investigators, you mean --  
 16 **Q.** Those who carried out an investigation function. People  
 17 who were formerly counter clerks and then investigated  
 18 shortfalls and discrepancies and --  
 19 **A.** The Audit Team, you mean?  
 20 **Q.** Yes.  
 21 **A.** Yes, a number of those were -- yeah --  
 22 **Q.** Yeah, members?  
 23 **A.** -- members -- certain members of the Audit Team were  
 24 members of the CWU. Managers of the Audit Team were  
 25 not --

102

1 to be aggressive, not always -- I wouldn't trust them.  
 2 **Q.** So, to the extent that any of those were your members,  
 3 is it something that you could or should or would now  
 4 provide training to your members in how to conduct  
 5 themselves?  
 6 **A.** Training to our members?  
 7 **Q.** Well, members who are conducting those kind of  
 8 functions --  
 9 **A.** Our reps?  
 10 **Q.** Yeah.  
 11 **A.** We -- as I said earlier, we provide training for our  
 12 reps.  
 13 **Q.** Sorry, not your reps. The members who are actually  
 14 conducting themselves in this way. Do you consider the  
 15 CWU has an obligation to perhaps remind its members of  
 16 how to conduct themselves when carrying out their  
 17 functions?  
 18 **A.** Sorry, members of the investigation branch were not  
 19 members of the CWU, members of the Audit Team were.  
 20 **Q.** Audit Team, yes.  
 21 **A.** I'm talking about -- we're talking about two different  
 22 things.  
 23 **Q.** Two different things?  
 24 **A.** We had the investigation branch who sit down and accuse  
 25 people of theft or wrong doing. The Audit Team -- so

104

1 the Audit Team -- predominantly in Crown Offices,  
2 individual stocks and the office balance is conducted on  
3 a Wednesday evening. Predominantly, Audit Teams would  
4 arrive before the opening of business on a Thursday  
5 morning and do a full audit. So they would audit all  
6 the individual stocks and the whole office balance to  
7 check that the closing balance that the office and the  
8 individuals declared on a Wednesday night was, in fact,  
9 accurate.

10 The staff who carried that out were CWU members but  
11 they were not the ones who would be interviewing  
12 individual members of staff and accusing them of, for  
13 example, theft. That was the Post Office Investigation  
14 Branch. Two separate bodies within the Post Office.

15 **Q.** But those individuals might have been the ones out in  
16 the field dealing with subpostmasters. That's what the  
17 evidence has heard; would you accept that?

18 **A.** The Audit Team?

19 **Q.** Yes, members of the Audit Team.

20 **A.** Yes.

21 **MS WATT:** Thank you. Those are all my questions. Thanks.

22 **SIR WYN WILLIAMS:** Right, Ms Hodge where are we with this  
23 document?

24 **MS HODGE:** Sir, I don't think there's any need to share it  
25 in the end. I think the questions were posed in a more

105

1 **Q.** Thank you for attending the Inquiry to give evidence  
2 today. You have produced a written witness statement,  
3 could I ask you to turn that up, please. That's in  
4 front of you. Excellent. It should have the date in  
5 the top right of 16 May 2024.

6 **A.** Yes, it does.

7 **Q.** Thank you. For the record, that Unique Reference Number  
8 is WITN00550100. Now, before I go to your signature,  
9 could I ask you to turn to page 24, please,  
10 paragraph 91. It doesn't need to be shown on screen  
11 you, on the first line, refer to "Jo Swenson's" -- well,  
12 spelt with an "E", I understand you wish to correct that  
13 to "Swinson", spelt with an "I"?

14 **A.** Yes, please. Spelling mistake, and it's the first of  
15 two paragraphs 91, which is a numerical mistake.

16 **Q.** Can I ask you to turn to page 41, please.

17 **A.** Yes.

18 **Q.** You should see paragraph 157 and then below that  
19 a statement of truth with your signature?

20 **A.** That's my signature. Thank you.

21 **Q.** Can I ask, are the facts in that statement true to the  
22 best of your knowledge and belief?

23 **A.** They are.

24 **Q.** That will stand as your evidence in the Inquiry and it  
25 will be published shortly on the website. I'm going to

107

1 general way.

2 **SIR WYN WILLIAMS:** Fine.

3 **MS HODGE:** So that concludes the questions from the  
4 recognised legal representatives and the witness may be  
5 released.

6 **SIR WYN WILLIAMS:** Yes, thank you, Mr Kearns, for  
7 reappearing at the Inquiry and answering further  
8 questions. I'm grateful to you.

9 So, is it sensible to break for lunch now?

10 **MS HODGE:** Sir, I think so, yes.

11 **SIR WYN WILLIAMS:** So we'll resume at 1.40?

12 **MS HODGE:** Yes, thank you.

13 **SIR WYN WILLIAMS:** All right, fine.

14 (12.41 pm)

(The Short Adjournment)

16 (1.40 pm)

17 **MR STEVENS:** Good afternoon, sir, can you see and hear me?

18 **SIR WYN WILLIAMS:** I can indeed.

19 **MR STEVENS:** Thank you, we are going to hear from Kay  
20 Linnell.

21 **SIR WYN WILLIAMS:** Yes.

**DR KAY CATHERINE SHEILA HILARY LINNELL (sworn)**

**Questioned by MR STEVENS**

24 **MR STEVENS:** Please could you state your full name?

25 **A.** Kay Catherine Sheila Hilary Linnell.

106

1 ask you some questions about it but, before I do,  
2 I understand that you'd like to make a statement?

3 **A.** Yes, please. Thank you.

4 Before I start, I'd like to say this is a good  
5 opportunity to pay tribute to those who have worked very  
6 hard behind the scenes to help the SPMs to right the  
7 miscarriage of justice that has been brought to light.  
8 There are many unsung and unseen heroes and I have been  
9 personally supported very strongly by Howe+Co in this  
10 matter and, before that, by Freeths in the High Court  
11 litigation, and by other firms, such as Huddells.

12 I would like to pay my respect and thanks to them,  
13 because a lot of what they've done is unpaid and  
14 unnoticed. Their support continues.

15 One other person I'd like to nominate for a special  
16 vote of thanks, so to speak, on behalf of the SPMs and  
17 myself is Barbara Jeremiah, my business partner.  
18 I slightly blame her for becoming involved in this,  
19 because Barbara believed in Jo Hamilton's innocence and  
20 would not believe me until we got involved. Jo is our  
21 local subpostmistress, or was, and Barbara has worked  
22 tirelessly providing support, guidance and encouragement  
23 to many subpostmasters in the very many years we've been  
24 involved.

25 Barbara has been involved in almost 20 years and has

108

1 never once wavered from her steadfast belief against  
2 impossible odds. Barbara has never refused a request  
3 for help from any SPM and has always been mindful of the  
4 damage inflicted on them and their families by the  
5 malicious, incompetent, coercive, controlling behaviour  
6 of the shape-shifting Post Office.

7 We will continue to give support to SPMs in every  
8 way we can, through accountancy, taxation, counselling  
9 and advice, and any SPM who needs advice should contact  
10 us until the money wrongly extracted from them, and the  
11 damages to compensate them, have been paid in full.

12 The new Post Office team appear to be no better  
13 organised than the old one through recent events but  
14 I will not mention that. Thank you.

15 **Q.** We are not going to cover any recent events, we'll look  
16 at matters in the Inquiry's terms of reference. I'm  
17 going to start with your background, please.

18 You qualified as a chartered accountant in 1979?

19 **A.** Correct.

20 **Q.** You now work as forensic accountant?

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

22 **Q.** When did you first start to act as a forensic  
23 accountant?

24 **A.** Possibly in the late '80s/early '90s.

25 **Q.** From that point the late '80s/early '90s, did you work  
109

1 **Q.** Could I start with your initial interaction, then, with  
2 subpostmasters and the subpostmasters' cause. Could we,  
3 please, bring up the witness statement at page 2,  
4 paragraph 5. If we could have paragraph 5 at the top.  
5 You say:

6 "I became involved in the Post Office treatment of  
7 its subpostmasters in 2009 because of my local  
8 postmistress, Jo Hamilton."

9 You then refer to your business partner, saying she  
10 used to drop into Jo's shop in South Warnborough to buy  
11 her lunch on the way to court:

12 "One day in 2005, she found Jo in tears because of  
13 ever increasing unexplained shortfalls in her business  
14 accounts."

15 You go on to describe some aspects of the criminal  
16 trial.

17 Can I just clarify, were you first made aware of Jo  
18 Hamilton's case in 2009?

19 **A.** No, earlier than that, and I did try and get involved in  
20 2009 but my real first involvement with Sir Alan was in  
21 2012.

22 **Q.** Thank you. So is it fair to say that you were aware of  
23 some facts of the issues, you were aware of  
24 Ms Hamilton's case before -- well, before you became  
25 involved with Sir Alan but it's only at that later stage  
111

1 for a firm or on a self-employed basis?

2 **A.** I began engagement with fraud when I was a partner in  
3 a small firm of chartered accountants in Derby and,  
4 having discovered fraud, I applied to and joined the  
5 Inland Revenue and ultimately became the board of Inland  
6 Revenue's Chief Investigating and Prosecuting Accountant  
7 and Head of Accounting Profession, prosecuting several  
8 well-known figures. I then left HMRC, as it became, and  
9 I set up the Joint Insolvency Monitoring Unit to monitor  
10 insolvency practitioners.

11 I've also worked in the industry for Forte Plc as  
12 Head of UK Taxation and then went back into the  
13 profession with a small London firm of accountants and  
14 I was then headhunted by Smith & Williamson to set up  
15 a Southampton branch as a forensic accountant and  
16 latterly by BDO. In about 2010, I set up my own  
17 practice.

18 **Q.** So when you were first engaged in or involved in matters  
19 relating to subpostmasters, for whom were you working at  
20 that stage.

21 **A.** I was working for myself. It was about 2012.

22 **Q.** I think you mentioned BDO, you were employed by BDO?

23 **A.** Yes, I was the Forensic Director in Southampton.

24 **Q.** What was the full name of BDO, sorry?

25 **A.** I think, at that stage, it was BDO LLP, I forget.  
110

1 in 2012 when you became involved.

2 **A.** Yes. You could almost say I got my hands dirty from  
3 2012 onwards but I was well aware of it much earlier  
4 than that.

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

6 You go on to say that your business partner  
7 suggested that you spoke to Jo Hamilton in June 2012.

8 **A.** Yes, that's right.

9 **Q.** At that point, I think, Ms Hamilton suggested that you  
10 spoke to Sir Alan?

11 **A.** That's correct.

12 **Q.** Now, had you heard of Sir Alan before that, before you  
13 spoke to him?

14 **A.** Yes, indeed. Mrs Hamilton told me all about him,  
15 regularly.

16 **Q.** Can you recall your initial meeting with him?

17 **A.** I met Sir Alan outside James Arbuthnot's office in  
18 a first meeting which we were going to have with James  
19 Arbuthnot, and Ron Warmington and Ian Henderson of  
20 Second Sight.

21 **Q.** So I'm going to come to that meeting shortly but that's,  
22 effectively, the first --

23 **A.** That was my first physical meeting. I had had a couple  
24 of telephone calls with him.

25 **Q.** I just want to ask a few points about representation  
112

1 generally, starting with the JFSA. At paragraph 9 of  
 2 your statement, you say that JFSA is an unincorporated  
 3 affiliation with no constitution, rules or hierarchy,  
 4 but simply united by a common problem, which is to get  
 5 back the money wrongly taken by Post Office and attempt  
 6 to recover losses and damages caused by the Post Office  
 7 operation of the Horizon computer and support system in  
 8 the subpostmaster Post Office Network.

9 You say no hierarchy; was Sir Alan the chairman of  
 10 the JFSA?

11 **A.** In one way. He was effectively the person driving  
 12 a campaign and the SPMs that I met preferred that he led  
 13 the way for them. I don't think there's an officially  
 14 recognised hierarchy or structure where there's chairman  
 15 or secretary or treasurer, or anything like that.

16 **Q.** How was decision making on behalf of the JFSA as  
 17 a whole, how did that decision making happen?

18 **A.** It happened at group meetings by show of hands.

19 **Q.** When you first met Sir Alan in 2012, can you recall  
 20 roughly how many subpostmasters or former subpostmasters  
 21 formed part of the JFSA?

22 **A.** I don't know that information.

23 **Q.** Do you know how the JFSA was funded at that time?

24 **A.** My understanding is it had no funding.

25 **Q.** At that time, had you had any contact with the NFSP?

113

1 **Q.** Prior to that meeting, had you had any experience or  
 2 dealing with either Ron Warmington or Ian Henderson?

3 **A.** None whatsoever. I looked them up before meeting them  
 4 but I wasn't certain that they weren't people put up to  
 5 do a whitewash burial job by the Post Office.

6 **Q.** So we can actually bring up your witness statement,  
 7 please, page 4. There you say:

8 "I was extremely suspicious of Second Sight, as they  
 9 had been nominated by [Post Office] as independent  
 10 forensic accountants, and I was concerned that their  
 11 access to documents and review of [Post Office's]  
 12 Horizon system might be a whitewash. I challenged them  
 13 at our meeting in 2012 but was satisfied with their  
 14 responses."

15 Can I ask your recollection of how you challenged  
 16 them at that meeting?

17 **A.** I recall I asked them various questions about their  
 18 background and approach to what ended up being the spot  
 19 reviews of the cases.

20 **Q.** Do you recall what they said to satisfy you?

21 **A.** Not precisely but I wanted to know what documents they  
 22 were going to look at, what level they were going to  
 23 look at in the IT support and whether they were going to  
 24 meet the complainants.

25 **Q.** You said in your evidence then what ended up being the

115

1 **A.** None whatsoever.

2 **Q.** Let's go, then, to the meeting in July 2012, and I think  
 3 you say that that was with Sir Alan, Ron Warmington, Ian  
 4 Henderson and Lord Arbuthnot?

5 **A.** Correct.

6 **Q.** Before that meeting, what had you been told about the  
 7 purpose of it -- sorry, the purpose of the meeting?

8 **A.** I was told the purpose of the meeting was to consider  
 9 a mediation proposal put forward by the Post Office.

10 **Q.** So did you say mediation proposal?

11 **A.** A mediation proposal put forward by the Post Office to  
 12 James Arbuthnot which he wanted JFSA to sign up to, to  
 13 try to resolve the -- I think it was 47 MP complaints  
 14 about SPMs.

15 **Q.** Pausing there, there was obviously the Mediation Scheme,  
 16 which we'll come to after the Interim Report in 2013.

17 This in July 2012, prior to the Second Sight Interim  
 18 Report, was this still described to you as a mediation  
 19 proposal?

20 **A.** My recollection, which may not be that accurate at this  
 21 remove of time, but my recollection was there was  
 22 looking to be a mechanism to resolve the disputes,  
 23 effectively raised by the 47 SPMs complainants thorough  
 24 their MPs, and they wanted an initial external  
 25 independent forensic firm of accountants to look at it.

114

1 spot reviews. From your recollection, was the concept  
 2 of spot reviews discussed at that meeting?

3 **A.** Not to my recollection, no.

4 **Q.** Do you recall, broadly, what the proposal from Second  
 5 Sight was?

6 **A.** I think the initial proposal was to pick several of the  
 7 47 cases and do an in-depth review of each of them to  
 8 try to find out what had gone wrong and whether the  
 9 complainant had any substance in what they were saying.

10 **Q.** So, at that stage, a focus looking to specific cases  
 11 raised by MPs?

12 **A.** Yes.

13 **Q.** Lord Arbuthnot produced a witness statement and gave  
 14 oral evidence to this Inquiry, the witness statement was  
 15 dated 12 March, and he recalls this meeting taking place  
 16 on 12 July 2012, and his evidence was that you and Alan  
 17 were satisfied and agreed to the appointment of Second  
 18 Sight at that meeting, with the caveat that you would be  
 19 able to double check that Second Sight were acting  
 20 independently; would you agree with that?

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

22 **Q.** At that point, how did you envisage checking on Second  
 23 Sight's independence?

24 **A.** At that stage, I thought I would be acting as  
 25 an independent forensic accountant for JFSA and,

116

1 I believe at the time, I prepared a letter of engagement  
 2 and it was agreed I'd be paid a small fee for checking  
 3 their work and going round with them, just to see what  
 4 they were doing.  
 5 **Q.** Let's look at that letter of engagement now. It's  
 6 exhibited to your witness statement at WITN00550101. Is  
 7 this the letter to which you were referring?  
 8 **A.** Yes, it is.  
 9 **Q.** It's dated 6 July 2012, so shortly after the meeting  
 10 with Lord Arbuthnot and Second Sight?  
 11 **A.** 16 July 2012.  
 12 **Q.** 16th, sorry, did I say the 6th? I do apologise. 16th.  
 13 If we could go down, please. We see "Scope of Our  
 14 Work", it says, well, firstly a sentence about acting as  
 15 expert accountant and --  
 16 **A.** Yes.  
 17 **Q.** -- refers to Second Sight. The second sentence says:  
 18 "The initial investigation would be in two parts,  
 19 the first being into current errors, the second to  
 20 investigate the historic cases which have been raised by  
 21 MPs and a number of cases you will recommend."  
 22 **A.** That's correct.  
 23 **Q.** So is that broadly what Second Sight were suggesting at  
 24 this time, or at least your understanding of it, a look  
 25 at, in the first tranche, current cases and then more

117

1 before then?  
 2 **A.** I don't think I'd met Alwen Lyons before then and  
 3 I think I had seen rather than spoken to Paula Vennells.  
 4 There was a briefing day in the September of that year  
 5 when I definitely met them but I don't recall meeting  
 6 them before then.  
 7 **Q.** The Interim Report is produced on 8 July 2013.  
 8 **A.** Yes.  
 9 **Q.** Was this meeting before or after the Interim Report?  
 10 **A.** Unfortunately, I can't find the date but I believe it  
 11 was before the Interim Report was released.  
 12 **Q.** But you're confident that it was 2013 and not 2012?  
 13 **A.** Yes.  
 14 **Q.** We'll come back to that meeting, then, in due course.  
 15 Can I please ask for us to look at POL00091028. If we  
 16 could go down, please, thank you. So we have an email  
 17 from Ronald Warmington to Mike Wood MP. You're not in  
 18 copy to this, so you wouldn't have seen it at the time,  
 19 presumably?  
 20 **A.** No.  
 21 **Q.** Have you seen it for the first time when preparing for  
 22 the Inquiry?  
 23 **A.** That's correct, yes.  
 24 **Q.** The second paragraph of that email says:  
 25 "The idea of carrying out a deep dive into Horizon

119

1 historic ones in a second tranche?  
 2 **A.** That was my understanding.  
 3 **Q.** At this stage, was there any discussion, from your  
 4 recollection, of systemic errors or looking for systemic  
 5 errors?  
 6 **A.** No, not at all.  
 7 **Q.** That document can come down. Thank you.  
 8 If we could bring up the witness statement, please,  
 9 page 4, paragraph 15.  
 10 **SIR WYN WILLIAMS:** Before that comes up, Mr Stevens, can you  
 11 remind me to whom that letter was addressed? I saw that  
 12 it was on Ms Linnell's notepaper but it's "Dear sirs";  
 13 is there a --  
 14 **MR STEVENS:** Yes, the addressee is Justice for  
 15 Subpostmasters Alliance but, actually, sir, you are  
 16 quite right, the question I should ask, if it's  
 17 an unincorporated association, was to whom was that  
 18 letter sent?  
 19 **A.** It was sent to Alan Bates.  
 20 **Q.** There we are on the witness statement. So paragraph 15,  
 21 you refer to attending a meeting at Post Office with  
 22 Alwen Lyons and Paula Vennells. You say "I think in  
 23 around June or July 2013".  
 24 **A.** That's correct.  
 25 **Q.** Had you met with Alwen Lyons and/or Paula Vennells

118

1 is on hold until we have completed the Case Reviews.  
 2 Few of us think that sort of review will work well.  
 3 Some of us think it would probably turn out to be  
 4 a colossal and expensive disappointment (for those  
 5 seeking evidence of anomalies in Horizon). Those  
 6 pressing for such a Review now seem happy to wait to see  
 7 what the Case Reviews throw up."  
 8 Do you have any recollection, between the meeting  
 9 you had with Second Sight on 12 July and this meeting on  
 10 18 July, of any discussion about a deep dive review or  
 11 specific case reviews?  
 12 **A.** No, we only had the one meeting to start the process  
 13 off. I think it's referring to our first meeting.  
 14 **Q.** At this stage, you were happy with the case reviews  
 15 approach?  
 16 **A.** I think if you didn't approach it through case reviews,  
 17 you wouldn't know what anomalies you would be looking  
 18 for. You'd be checking 100 per cent of the system at  
 19 vast cost and it would take an enormous amount of time,  
 20 so I do agree with starting with the problems and then  
 21 working back to see what went wrong.  
 22 **Q.** Thank you, that document can come down.  
 23 Please can we bring up your witness statement at  
 24 page 11, paragraph 47. Thank you. Now, this is  
 25 something I've already touched on. You say here about

120

1 the distinction between systems error and systemic  
2 error. You say:  
3 "It's worth noticing the difference between  
4 a 'systems error', (that is an IT coding error that will  
5 replicate an error of the entry of the same data and  
6 processing of the transactions in the IT system) and  
7 a 'systemic error'), that is one caused by incorrect  
8 implementation and management of the subpostmaster  
9 network using the Horizon computer accountancy system)."

10 Were those concepts, as you describe them there,  
11 discussed with Second Sight in 2012?

12 **A.** I think the first time the words "systemic error" was  
13 used was in a letter from Sir Alan to, I think, James  
14 Arbuthnot, and the difference between Ron and Ian's  
15 definition of systemic errors and ours is theirs was  
16 restricted solely to the computer system, whereas ours  
17 saw it to be a complete system of administration,  
18 training, implementation and management, using the  
19 computer Horizon.

20 **Q.** Do I take it from that, then, that there wasn't  
21 a discussion with Horizon on the difference between  
22 "systems error" and "systemic error" in 2012?

23 **A.** Not that I recall.

24 **Q.** Could we look, please, at the Interim Report. It's  
25 POL00099063. If we could go to page 22, please, so this  
121

1 **A.** The JFSA were an alliance of people who had similar  
2 problems with the Horizon system, who'd suffered  
3 personal damage but had no information whatsoever. If  
4 it could be taken to the next stage of taking it to the  
5 court, the SPMs, JFSA, required evidence, and there was  
6 no way of getting evidence from the Post Office, except  
7 through MP complaints. So there was no other course of  
8 action they could have taken at that stage, in my  
9 personal opinion.

10 **Q.** Just to be clear, that was your opinion at the time?

11 **A.** It was my opinion at the time and remains so.

12 **Q.** In 2011, the Inquiry has seen letters of claim from  
13 Shoosmiths starting or intimating actions and the  
14 Inquiry has heard evidence of, in 2005, Post Office  
15 considering that a group action may be on the horizon at  
16 some stage. Why was that not a viable option for the  
17 JFSA at the time? You've mentioned the evidential  
18 concerns; were there any others?

19 **A.** There are two problems that JFSA faced: one is no  
20 evidence or information; and the second is no funding.  
21 So to get funding, you'd have to put a case together to  
22 take to a litigation funder and, without any information  
23 being extracted from the Post Office, it would be  
24 impossible. It had already been tried and kept being  
25 tried to get Freedom of Information requests, and the  
123

1 is an appendix to the Interim Report which sets out, it  
2 says, the remit of the inquiry. It says:

3 "The remit of the Inquiry will be to consider and to  
4 advise on whether there are any systemic issues and/or  
5 concerns with the 'Horizon' system, including training  
6 and support processes, giving evidence and reasons for  
7 the conclusions reached."

8 Do you recall the first time you heard the inquiry  
9 expressed in those terms was?

10 **A.** I think it was on the publishing of this report which  
11 I didn't see in draft before it was published. I just  
12 saw the final version.

13 **Q.** Keeping at the time when the Second Sight review was  
14 commissioned, so July 2012, what at that time was your  
15 view of the Post Office's motivations for commissioning  
16 that review?

17 **A.** Personal opinion is that they wanted to settle the MPs'  
18 complaints and make it quiet.

19 **Q.** What was that based on?

20 **A.** It was based on the attitude of the Post Office in  
21 falling over themselves to provide information about  
22 those particular cases and nothing else.

23 **Q.** In your view at the time, what, if any, other options  
24 were open to the JFSA to push forward with the  
25 subpostmasters' concerns?  
122

1 one I am familiar with is Jo Hamilton's, which came  
2 about an inch thick with nearly every page redacted but  
3 for one or two words. It was a document that must have  
4 cost a lot of ink but it couldn't be used for litigation  
5 because there was no information worth using.

6 **Q.** So is it fair to say that the access to information  
7 about the cases and the system, was absolutely  
8 imperative to pursuing the subpostmasters' campaign?

9 **A.** It was critical because, without such information, it  
10 would not have been possible to convince any lawyer  
11 there was a case to be answered.

12 **Q.** At this stage, to what extent had the JFSA sought out  
13 assistance from other bodies, such as the NFSP?

14 **A.** I'm not aware of that, I'm afraid.

15 **Q.** I'd like to now, look, at the Second Sight investigation  
16 itself. Please could we bring up POL00097402. This is  
17 an email on 25 January 2013 from Ian Henderson to Janet  
18 Walker. Now, Janet Walker worked for Lord Arbuthnot,  
19 then James Arbuthnot MP.

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

21 **Q.** It says:

22 "Ron and I have discussed this.

23 "We both think it's an excellent idea for Alan and  
24 Kay to be invited [referring to a meeting]. We are now  
25 working quite closely with them and have almost daily  
124

1 contact."

2 Would you agree with that about the state of your  
3 working relationship at January 2013?

4 **A.** Yes, I was going out to various meetings with SPMs with  
5 Ron, and Alan and Ian were also talking quite a lot so,  
6 yes, I would agree with that.

7 **Q.** At that stage did either Mr Henderson or Mr Warmington  
8 communicate to you any of their views on what they'd  
9 heard about the Horizon IT System?

10 **A.** As you've heard from them on Tuesday, you'll know that  
11 they're not backward at telling their views about  
12 things, so yes, they had.

13 **Q.** What's your recollection of what they said?

14 **A.** My recollection was they found sufficient errors,  
15 defects and problems that the complaints by the  
16 subpostmasters through their MPs were generally being  
17 found to be based on errors in the Horizon system.

18 **Q.** At that stage, how satisfied were you with the work that  
19 they had and were carrying out?

20 **A.** I was very satisfied that they were trying to do their  
21 best to get information from Post Office to answer the  
22 question we'd all been asking: why had these differences  
23 occurred?

24 **Q.** At that stage, January 2013, had either Mr Warmington or  
25 Mr Henderson mentioned concern that there may have been  
125

1 "Now systemic failures on the other hand are  
2 different, and in my letter to James Arbuthnot ..."

3 Now, pausing there, was that the letter to which you  
4 referred earlier in your evidence as the first time you  
5 recollect this issue arising?

6 **A.** Yes, that's my recollection.

7 **Q.** He says:

8 "... where I first use the phrase, I have qualified  
9 its context.

10 "This occurs in the first sentence of paragraph 2,  
11 where I say 'the weight that it adds to the systemic  
12 failures with Post Office and the Horizon system'. It  
13 is these systemic failures with Post Office and their  
14 Horizon system that are the proven facts."

15 Now, do you agree with that definition of system  
16 errors and systemic failures.

17 **A.** Yes, I do.

18 **Q.** Did you have any further discussion on that distinction  
19 with any representatives of Second Sight following this  
20 email?

21 **A.** No, I left this to Alan because he had some experience  
22 in point of sales and software and, frankly, I'm too  
23 old. I use pen and ink, really.

24 **Q.** Before we move to look at the Interim Report itself, to  
25 what extent were you aware of Fujitsu's involvement  
127

1 miscarriages of justice?

2 **A.** No, we didn't discuss criminal prosecutions or  
3 miscarriage of justice. We were simply looking to try  
4 to find out why the errors had occurred.

5 **Q.** Please could we bring up POL00098315. If we can move  
6 down the page, please. Thank you. We have an email  
7 from Sir Alan to Ron Warmington on 12 May 2013.  
8 I believe that data protection has covered up the email  
9 address but I believe that's you in copy; is that right?

10 **A.** Yes, I was copied.

11 **Q.** It's responding to quite a lengthy email from  
12 Mr Warmington, which I don't need to take you to. As  
13 you may expect, it's the "System Errors vs Systemic  
14 Failures" that I want to deal with. It says:

15 "I think there may be, at times, confusion by others  
16 over the referring of these two points. At its most  
17 basic, system errors would to me be something like  
18 an extra loop in the software code causing the false  
19 result of a transaction, but as you rightly say, that  
20 would affect every one of the 11,500 offices. Then at  
21 the other end of the scale it might be something far  
22 more complex resulting from a network communication  
23 failure and an incomplete recovery of a transaction at  
24 a particular office ..."

25 It goes on, and Sir Alan goes on to say:  
126

1 during the -- sorry, I'll rephrase that.

2 To what extent were you aware of Fujitsu being  
3 consulted by Post Office during the Second Sight  
4 investigation?

5 **A.** I assumed, at this time, that Fujitsu held some of the  
6 electronic evidence and data and they would have to be  
7 asked by Post Office to produce it. I'm not aware of  
8 any consultations.

9 **Q.** So is it fair to say that was an assumption you made  
10 because they operated the computer system but you had no  
11 direct knowledge of Post Office contacting Fujitsu?

12 **A.** Not at that time, no.

13 **Q.** At that time, had you heard of Gareth Jenkins?

14 **A.** No, I had not.

15 **Q.** I said it would be before I move to the Interim Report  
16 but, of course, I put off the question I was going to  
17 ask earlier about a meeting with Paula Vennells and  
18 Alwen Lyons. Could we please bring up your statement at  
19 page 4, paragraph 15. Thank you.

20 So you refer to, again, this meeting in either June  
21 or July 2013 and my understanding is that this was  
22 before the Interim Report came out. That was your  
23 evidence earlier.

24 **A.** Yes, that's correct, and I believe it was requested by  
25 Post Office. We'd written and asked for a meeting  
128



1 I think on around the beginning of June 2013, and the  
 2 date was suggested by, I think, Paula Vennells.  
 3 **Q.** Well, let's see if we're thinking about the same email.  
 4 Could we bring up POL00098418, please, and if we could  
 5 go to the bottom of the page, please. This is an email  
 6 from Sir Alan on 21 May 2013, and the last paragraph on  
 7 the page says:  
 8 "Would it be possible for Kay Linnell and I to meet  
 9 with you?"  
 10 Is that the email you were referring to?  
 11 **A.** Yes, and I think there's some subsequent emails where  
 12 she comes back and I think a date of 5 June was  
 13 suggested but that wasn't convenient. Yes, it's down  
 14 there at the bottom of the page.  
 15 **Q.** So looking at this email, Sir Alan refers to you and who  
 16 you are, as a reminder. If we go down, he says that:  
 17 "The main purpose of the meeting is to ensure that  
 18 you have been receiving the full details of what has  
 19 been occurring with the Second Sight investigation.  
 20 Bearing in mind what has been discovered so far, I for  
 21 one am surprised that we haven't yet met to discuss the  
 22 implications."  
 23 Now, pausing there, at that stage, what had been  
 24 discovered so far that prompted an email from Sir Alan?  
 25 I should ask, sorry, did you and Sir Alan discuss this  
 129

1 spot cases.  
 2 **Q.** Just pausing there, when you say "errors", can you  
 3 remember, putting yourself back to the time, what those  
 4 errors were which led you to believe this?  
 5 **A.** I can't remember which names the bugs had but --  
 6 **Q.** Is it bugs that you're referring to?  
 7 **A.** It's bugs and everyone has called them bugs but they're  
 8 actually errors in the computer software programming  
 9 that, when you put in a certain series of transactions,  
 10 always cause a difference. And as the Post Office read  
 11 the contract, that it was always the subpostmaster's  
 12 fault or liability, whatever the circumstances, it was  
 13 clear to me that money had been taken wrongly, and also,  
 14 as in Jo's case, they had relied on the computer figures  
 15 to mount a prosecution, and I therefore felt at that  
 16 stage prosecutions might or probably were unsafe.  
 17 **Q.** Was that, the prosecutions being unsafe --  
 18 Let me rephrase it. Who did you discuss your  
 19 concern that prosecutions may have been unsafe, other  
 20 than Sir Alan and, by way of this email, Paula Vennells?  
 21 **A.** Nobody, because it's a suspicion, not evidence and, as  
 22 forensic accountant, I have prosecuted people while  
 23 I was at HMRC/Inland Revenue, and I am aware of the  
 24 standard beyond reasonable doubt and the evidence  
 25 required to show criminal intent, none of which appeared  
 131

1 before sending it?  
 2 **A.** Yes, we regularly discussed things and swapped drafts  
 3 and, as I recall, what had been discovered is there had  
 4 been substantial and important errors in the operation  
 5 of the computer, which had caused differences in  
 6 shortfalls in SPMs' accounts, and it was, at this stage,  
 7 we had, from the spot reviews, evidence that Horizon did  
 8 not operate perfectly and left differences.  
 9 **Q.** It goes on to say, the final sentence of the paragraph:  
 10 "I have little doubt that it is now feasible to show  
 11 that many of the prosecutions that [Post Office] have  
 12 pressed home should never have taken place, and  
 13 I believe this is a view shared by Kay."  
 14 Was that a view shared by you?  
 15 **A.** Very much so.  
 16 **Q.** Again, so we're clear here, what was it at that stage  
 17 that led you to believe that it was feasible to show  
 18 that many prosecutions should not have taken place?  
 19 **A.** Bearing in mind I had personal knowledge of Jo  
 20 Hamilton's case and her case was taken to the doors of  
 21 the trial before a plea bargain, without any evidence  
 22 being given to Jo to check, as to how and why the errors  
 23 arose, when Second Sight started their spot reviews,  
 24 they also found that there were errors which hadn't been  
 25 disclosed to people who were prosecuted as part of the  
 130

1 to be present in Jo's case. But I was not aware of  
 2 sufficient evidence to take that anywhere else. It was  
 3 a suspicion.  
 4 **Q.** The last question I'd like to ask on this email is the  
 5 use of the words:  
 6 "The main purpose of the meeting is to ensure that  
 7 you have been receiving the full details of what has  
 8 been occurring ..."  
 9 Do you know why Sir Alan used that turn of phrase?  
 10 **A.** We actually discussed this. It's a question, we  
 11 thought, of the Post Office being a former Government  
 12 organisation which had silos where, for example, the  
 13 Legal Department appeared to be completely separate from  
 14 the Operation and Management Department of the Post  
 15 Office Network and there appeared to be management  
 16 layers between them and the Board and the CEO. So Alan  
 17 and I wanted to make sure the people at the top knew  
 18 exactly what had been found.  
 19 **Q.** If we then can go back to the meeting, which we had in  
 20 your witness statement, so if we could bring back page 4  
 21 of the witness statement, please, paragraph 15, it says  
 22 that:  
 23 "We asked to meet Paula Vennells as CEO to try to  
 24 get a reality check on the [Post Office] opposition to  
 25 recognising the plight that [Post Office] had caused  
 132

1 [subpostmasters], to admit Horizon was not 100 per cent  
2 perfect (as no computer system can be) and to get money  
3 paid back to [subpostmasters as soon as possible]."

4 You go on to say:

5 "At that stage, JFSA did not want a full public  
6 exposure just proper care for SPMs in giving money back  
7 wrongly taken and paying for losses and damages. We  
8 were asking for substantial amounts but nothing compared  
9 to their own bonuses published in great deal in the  
10 [Post Office Limited] annual accounts."

11 There you don't refer to prosecutions. Did you not  
12 discuss that with Paula Vennells at this meeting?

13 **A.** As far as I can recall, we discussed everything, and we  
14 were slightly worried that they'd used no evidence at  
15 all to mount criminal prosecutions without any idea of  
16 whether there was a guilty mindset or not. But I didn't  
17 refer to it there because I am not certain. I don't  
18 have any notes of that meeting. I can't even find the  
19 date of it, unfortunately.

20 **Q.** From your recollection, what do you think you said to  
21 Paula Vennells and Alwen Lyons about your concerns as to  
22 criminal prosecutions?

23 **A.** I believe Sir Alan and I have always been concerned  
24 about giving money back to subpostmasters who were in  
25 dire financial straits, having had money taken away from

133

1 **A.** Not before it was published.

2 **Q.** What did you understand the purpose of Second Sight  
3 releasing the Interim Report to be and, just to be  
4 clear, my question is before it was released?

5 **A.** Before it was released, I believe there was some  
6 pressure, particularly from -- James Arbutnot was my  
7 MP, as well as Jo's, and I think there was some pressure  
8 from the MP committee, led by James, to actually give  
9 some sort of Interim Report as to what the Second Sight  
10 investigation was finding. So, I believe they selected  
11 a few cases, four or five, and produced, effectively,  
12 a distilled analysis of them. Before they produced it,  
13 I expected it a full in-depth analysis of them.

14 **Q.** That purpose, so producing an interim distilled analysis  
15 of four or a select number of the spot reviews, did you  
16 think that was a -- what did you think of that as  
17 an idea?

18 **A.** Not a bad idea because it might start the ball rolling  
19 towards giving the money back, I thought, and as long as  
20 it's only a stepping stone in their enquiries, it  
21 wouldn't make any difference.

22 **Q.** Was there any discussion, before the Interim Report was  
23 published, as to what would happen to Second Sight's  
24 investigation after it was published?

25 **A.** No, I don't believe there was a discussion, I think

135

1 them, and the thought about prosecutions was something  
2 we suspected but couldn't prove or worry about. As in  
3 2013, so many years ago, we wanted the money given back  
4 to people it had been taken off, and that still is  
5 a primary concern. And, you know, I'm sorry to expand  
6 on the answer but I recall that all we got from Paula  
7 Vennells was her main purpose was to learn from the past  
8 and build the brand and make it profitable, which is not  
9 an answer to our questions at all.

10 **Q.** Do you recall there being any discussion on, or proposal  
11 put forward, by either Alwen Lyons or Paula Vennells  
12 that went to concerns about either criminal prosecutions  
13 or giving money back to subpostmasters as you requested?

14 **A.** No. None.

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

16 Please could we -- actually, before we go to that,  
17 the Interim Report, we know, is published on 8 July  
18 2013. What, if any, involvement, did you have with  
19 looking at or discussing drafts of the Interim Report  
20 with Second Sight?

21 **A.** None whatsoever.

22 **Q.** Did you have any discussion with representatives of  
23 Second Sight more generally about the content of the --  
24 not specific drafting but the content, the general  
25 content, of the Interim Report before it was published?

134

1 there was an understanding that the Second Sight  
2 investigation would continue until they'd finished the  
3 subpostmasters' complaint cases, the ones from the MPs.

4 **Q.** Sorry, I --

5 **A.** I beg your pardon.

6 **Q.** I overcut you there. I was about to ask, you said  
7 "until they'd finished the subpostmasters' complaint  
8 cases", and then you say the ones from the MPs, as in  
9 the cases referred by the MPs?

10 **A.** And I think they were augmented in some way by a few  
11 added by Post Office as sample cases, from memory.

12 **Q.** You referred to an understanding that Second Sight's  
13 work would continue. When you say that understanding,  
14 was that just your understanding or one shared by  
15 others?

16 **A.** The original engagement of Second Sight was by the MPs,  
17 countersigned by JFSA and Post Office were used by the  
18 MPs as a vehicle to implement the contract and pay,  
19 because the MPs did not have a budget. So my  
20 understanding was the MPs were instructing Second Sight,  
21 nobody else, and the MPs wanted an answer to their  
22 queries.

23 **Q.** Could we look now at the Interim Report, please. It's  
24 POL00099063. If we could look at page 8. The  
25 preliminary conclusions are very well known to the

136

1 Inquiry. We see there (a) "no evidence of system wide  
2 (systemic) problems" and (b) referring to two incidents  
3 of where "defects or 'bugs' in the Horizon system", and  
4 it goes on to refer to two of the bugs that the Inquiry  
5 has heard a lot about.

6 What do you think of, in particular, these two  
7 preliminary conclusions at the time?

8 **A.** I was particularly disappointed by conclusion (a)  
9 because I didn't think there was sufficient data for  
10 Second Sight to reach that conclusion. I don't think  
11 they should have opined at all on whether there were  
12 systemic problems at that stage. I also found in my own  
13 research, following them round, that they had found  
14 problems across the system where one error would affect  
15 many, many branches, and I was therefore disappointed.

16 **Q.** Just taking that in stages. Firstly, you say  
17 disappointed because you didn't think they had the  
18 evidence to say that, the fact they've said, "We have so  
19 far found", so saying, "we haven't found evidence of  
20 a systemic problem", did that not reassure you?

21 **A.** Quite the opposite. It made me think that Post Office  
22 had interfered with the report.

23 **Q.** When you said that you felt you had seen evidence of  
24 "system-wide (systemic) problems", do you recall, at the  
25 time, what you thought those were?

137

1 remotely, prior to the issuing of the Interim Report?

2 **A.** Yes.

3 **Q.** What were you told?

4 **A.** I was told it was possible to enter the system through  
5 a backdoor and it was a systemic error.

6 **Q.** Who told you that?

7 **A.** Well, believe it or not, I think it was Ron Warmington,  
8 but I've certainly talked to Sir Alan about it and we  
9 knew about the Bracknell and other parts of Fujitsu who  
10 regularly made corrections to the live system.

11 **Q.** So you spoke about it with Sir Alan and I think you said  
12 Ron Warmington discussed it with you. At this stage, so  
13 when the Interim Report was released, were you aware of  
14 Gareth Jenkins as a person?

15 **A.** No, I'm still not aware of Gareth Jenkins at this stage.

16 **Q.** You say in your statement -- we don't need to pull it  
17 up -- that you thought the Interim Report could have  
18 been much stronger with regard to the Post Office  
19 Limited field of operation and systemic working errors,  
20 and, in your oral evidence you've expressed frustration  
21 about the report.

22 Did you discuss your feelings on the report with  
23 either Mr Henderson or Mr Warmington at the time?

24 **A.** After the report was issued, yes.

25 **Q.** What did you say to them?

139

1 **A.** No, I can't recall. There was something to do with ATMs  
2 but I don't know whether that -- and it was the Bank of  
3 Ireland, but I'm sorry, my memory of that is very hazy.  
4 I just remember being quite cross about this because  
5 they shouldn't have put anything in without the evidence  
6 to support it and, from what I'd seen of Ron Warmington  
7 and Ian Henderson, they were very thorough, so I don't  
8 believe, on their own, they would have written that.

9 **Q.** Just to be clear, you weren't involved in the drafting  
10 process, so you don't have any direct knowledge of how  
11 this report was drafted?

12 **A.** None whatsoever.

13 **Q.** Can we turn to page 12, please. This is spot review 5,  
14 which concerns the allegation that had been made by  
15 Michael Rudkin, regarding what's now referred to in  
16 shorthand as remote access. The Inquiry has seen this  
17 a lot, I don't need to go through it in full. If we  
18 could just look at the bottom of page 13, please,  
19 saying:

20 "We are left with a conflict of evidence on this  
21 issue and our enquiries are continuing, particularly in  
22 light of the new information confirming that the meeting  
23 on 19 August 2008 did in fact occur."

24 Were you told anything about Fujitsu's ability to  
25 access data or insert data into branch accounts

138

1 **A.** I was disappointed.

2 **Q.** What was their response?

3 **A.** I don't exactly recall what they said, except that, you  
4 know, they'd had to discuss the draft with Post Office  
5 and clear it, which I still don't understand.

6 **Q.** I want to now look, then, at what happens next in the  
7 chronology. It's the Mediation Scheme. Were you  
8 involved in any discussions with Post Office  
9 representatives following the publication of the Interim  
10 Report about what to do next, following its findings?

11 **A.** Yes, there were extensive discussions generally led  
12 through James Arbutnot and Alan Bates about how we  
13 should go forward from the Interim Report because,  
14 although I thought they'd carry on finishing the job, it  
15 was clear they wanted to take a different line.

16 **Q.** When you say it was clear they wanted to take  
17 a different line, how did you come to learn of that?  
18 When you say "they" do you mean Post Office?

19 **A.** Post Office, I'm sorry, I should say. Post Office  
20 wanted to be seen, in my view, as reacting to the  
21 Interim Report in a positive way.

22 **Q.** Were you involved in the initial discussions as to the  
23 establishment of what became the Mediation Scheme?

24 **A.** Yes, I was.

25 **Q.** Who else was involved in those discussions?

140

1 A. Sir Alan Bates, Ron Warmington, Susan Crichton, Ian  
 2 Henderson, James Arbuthnot; possibly some others.  
 3 Q. So, on behalf on the Post Office, it was Susan Crichton?  
 4 A. Susan Crichton led the discussions.  
 5 Q. And can you recall, in terms of dates, when those  
 6 discussions took place?  
 7 A. They were some time around August 2013.  
 8 Q. What was your view of Susan Crichton's approach to the  
 9 issues in the Mediation Scheme?  
 10 A. She struck me as somebody who was trying to get to the  
 11 bottom of what had gone on and to put forward some  
 12 redress or remediation for the people who'd been caught  
 13 up in it.  
 14 Q. The Working Group that oversaw the Mediation Scheme, do  
 15 you remember when that first became suggested as  
 16 an idea?  
 17 A. The Working Group was merely a part of the Mediation  
 18 Scheme, and I think it was called the Initial Complaints  
 19 and Interim Mediation Scheme, as it's supposed to be  
 20 a model where we tested whether complainants could get  
 21 redress, and I believe it started with a training  
 22 session in September 2013, which I attended with Julian  
 23 Wilson from the JFSA.  
 24 Q. If we look at that now, if you can bring up your witness  
 25 statement, please, page 18, paragraph 66. So, as you  
 141

1 please -- actually, no, sorry, if we start on page 1.,  
 2 usually a good place to start. I think this is  
 3 exhibited to your witness statement as a presentation  
 4 given at this training day; is that correct?  
 5 A. That's correct. This is a copy of the slide deck.  
 6 Q. Can we turn to page 11, please. So we see Bond  
 7 Dickinson at the top. Can we infer from that that it  
 8 would be Andy Parsons giving this part of the  
 9 presentation?  
 10 A. This is Andy Parsons' presentation.  
 11 Q. We have "Possible remedies", I want to ask about two.  
 12 Can you recall what was said about compensation?  
 13 A. My recollection of this day is quite muddled, to be  
 14 honest. I have a feeling he said, if there is something  
 15 that's been done wrong, clearly the Post Office will  
 16 compensate you, or some wording like that. My notes are  
 17 also pretty fuzzy because I'm talking to people and  
 18 presenting as well. But I think it basically was that  
 19 they would pay compensation to people who had suffered,  
 20 if there was an error proved by Post Office.  
 21 Q. I appreciate you say your memory is -- I think the words  
 22 were "quite muddled" but do you recall what was said  
 23 about "Support a criminal appeal"?  
 24 A. Again, if the evidence -- I think my recollection is  
 25 that Andy Parsons said, if there was a proven  
 143

1 rightly say, it was attended by Julian Wilson and you  
 2 say:  
 3 "The training day was also attended by Second Sight,  
 4 and presentations were given by Susan Crichton, Angela  
 5 van den Bogerd and Andy Parsons."  
 6 Is this the first time you'd met Andy Parsons or had  
 7 you met him before then?  
 8 A. No, I think this was my first meeting with him.  
 9 Q. Do you have any recollection of his approach to the  
 10 training session itself?  
 11 A. The training session was done in such a way to explain  
 12 the background to the way Post Office operated and its  
 13 structure and Andy Parsons gave some legal overview.  
 14 I forget the details precisely.  
 15 Q. Angela van den Bogerd, was that your first dealing with  
 16 her or had you met her before?  
 17 A. No, this was my first dealing with her.  
 18 Q. Again, the same question. What was her -- what was your  
 19 view of her -- sorry, I'll rephrase that.  
 20 What was your view of her approach to the training  
 21 day and the Mediation Scheme at that point?  
 22 A. Her approach was to tell us sufficient to understand how  
 23 the Network was managed by Post Office and the duties of  
 24 the subpostmaster.  
 25 Q. Please can we look at WITN00550103, and page 11,  
 142

1 miscarriage of justice, they would support a criminal  
 2 appeal. Just as an aside, if I may, you would have  
 3 thought, if they'd known about Gareth Jenkins at this  
 4 stage, they would have actually told us in the briefing.  
 5 Q. Can we look, please, at POL00022120. This is a document  
 6 titled "Overview of the Initial Complaint Review and  
 7 Mediation Scheme". Was this a document to which the  
 8 JFSA had input?  
 9 A. Yes, we had a lot of input.  
 10 Q. Was it an agreed document?  
 11 A. In the end, yes. It was compromised in various parts  
 12 but it was generally agreed.  
 13 Q. Throughout my questions today, I'll come back to this,  
 14 and there may be points where I ask you where there's  
 15 been compromise but I'm not going to ask you for the  
 16 whole of the drafting by committee. Could I look,  
 17 please, at page 5. We have "Frequently Asked Questions  
 18 about the Scheme", and at the bottom, "What if my case  
 19 involves a completed criminal prosecution or  
 20 conviction?" It says:  
 21 "You may put your case through the Scheme even if  
 22 you have already receive a police caution or have been  
 23 subject to a criminal prosecution or conviction.  
 24 "However, Post Office does not have the power to  
 25 reverse or overturn any criminal conviction -- only the  
 144

1 criminal courts have this power.  
 2 "If at any stage during the scheme, new information  
 3 comes to light that might reasonably be considered  
 4 capable of undermining the case for a prosecution or  
 5 assisting for the defence, Post Office has a duty to  
 6 notify you and your defence lawyers. You may then  
 7 choose whether to use that new information to appeal  
 8 your conviction or sentence."  
 9 You may have already answered my question. At this  
 10 stage were you aware of the advice of Simon Clarke,  
 11 dated 15 July 2013, which raised allegations that Gareth  
 12 Jenkins had breached his expert duties to the court?  
 13 **A.** I believe the Clarke Advice was only disclosed in March  
 14 2021, after the criminal appeal trials.  
 15 **Q.** At this time, were you aware of the substance of the  
 16 allegations, namely that Gareth Jenkins had produced  
 17 expert evidence in breach of his duties to the court?  
 18 **A.** No, I wasn't aware.  
 19 **Q.** At this stage, were you aware that Post Office was  
 20 conducting an internal investigation into past  
 21 convictions?  
 22 **A.** No, I wasn't aware.  
 23 **MR STEVENS:** Sir, that might be a good time to stop for  
 24 an afternoon break.  
 25 **SIR WYN WILLIAMS:** Yes, that's fine. What time shall we  
 145

1 as to the appropriateness of Belinda Crowe's appointment  
 2 as a person to provide secretarial support to the  
 3 Working Group.  
 4 **A.** I didn't know anything about Belinda Crowe, except she  
 5 was a Post Office employee. I'm not sure that anybody  
 6 else was able to afford the services of a secretariat to  
 7 manage the case flows and assist with the disclosure  
 8 exercise of Post Office, which was headed up by Angela  
 9 van den Bogerd's Investigation Team, and I just accepted  
 10 her as someone nominated to do a job. But what I wasn't  
 11 aware of, which is what those two paragraphs indicate,  
 12 that she was senior in Post Office and not just  
 13 a secretary or somebody, and that she seemed to be  
 14 chairing somebody -- well, some group of people who were  
 15 working against the disclosure and settlement of the  
 16 cases. It's disingenuous in terms of a mediation  
 17 scheme.  
 18 **Q.** With hindsight, with that knowledge now, do you have any  
 19 concerns as to whether or not it affected the Mediation  
 20 Scheme or disclosure within it?  
 21 **A.** I believe it affected the recording of the minutes and  
 22 the progress of cases through mediation, but nothing  
 23 else.  
 24 **Q.** You say recording of the minutes, is that because  
 25 Belinda Crowe took the minutes?  
 147

1 resume?  
 2 **MR STEVENS:** Can we say 3.00, sir.  
 3 **SIR WYN WILLIAMS:** Yes, by all means.  
 4 **MR STEVENS:** Thank you.  
 5 (2.47 pm)  
 6 (A short break)  
 7 (3.00 pm)  
 8 **MR STEVENS:** Sir, can you see and hear me?  
 9 **SIR WYN WILLIAMS:** Yes, I can. Thank you.  
 10 **MR STEVENS:** Thank you. I want to carry on with a few  
 11 points on the Mediation Scheme now. Can we please have  
 12 your witness statement on the screen, page 20. Go to  
 13 the page before, please. Thank you. At paragraph 76,  
 14 you refer to Belinda Crowe as being the appointed  
 15 administrator and acted as secretary to the Working  
 16 Group.  
 17 **A.** Correct.  
 18 **Q.** You say at 77:  
 19 "I was not aware at that time that [Post Office] had  
 20 a separate committee chaired by Belinda Crowe called  
 21 Project Sparrow which was only revealed after the High  
 22 Court trials. The fact that JFSA did not know about  
 23 this is typical of [Post Office Limited's] behind the  
 24 scenes obsession with secrecy and control."  
 25 At the time, at the time, did you have any concerns  
 146

1 **A.** Belinda Crowe was responsible for the minutes the case  
 2 administration and producing bundles of documents for  
 3 the cases we looked at, at an early stage, to make sure  
 4 the system was working properly.  
 5 **Q.** I'm going to come back to the minutes later. So I won't  
 6 deal with it now. Could we look, please, at page 15 of  
 7 your statement. At paragraph 55, you referred to  
 8 minutes for the 30 January 2014 Working Group. You say:  
 9 "[Post Office] sought to narrow the terms of  
 10 reference and JFSA objected, Chris Aujard went away to  
 11 review the terms for [Post Office] and report back. He  
 12 did not report to any other Working Group meeting, and  
 13 to my recollection simply imposed the [Post Office] new  
 14 terms unilaterally to restrict the authority of the  
 15 Working Group that effectively further slowed up the  
 16 completion of cases and passing cases to mediation."  
 17 Can we bring up those minutes, please. That's  
 18 POL00026641. We see it's 30 January 2014.  
 19 **A.** Yes.  
 20 **Q.** If we can just scroll down slightly, please. Thank you.  
 21 We see there's a discussion about the terms of  
 22 reference, and under "Action" it says:  
 23 "Alan Bates raised the issue of the scope of the  
 24 Working Group and whether the intention was that the  
 25 terms of reference would replace existing documentation  
 148

1 particularly but not limited to the 'raising concerns  
2 about Horizon' documentation."

3 Secondly:

4 "Discussion then turned to the purpose set out for  
5 the Working Group with the point being made that if the  
6 terms of reference superseded previous documentation  
7 then JFSA felt the terms of reference as drafted were  
8 insufficiently broad."

9 Is that what you were referring to in your statement  
10 as the challenge?

11 **A.** Yes, it was an attempt to narrow the terms of reference  
12 that the Working Group could look at.

13 **Q.** In what way was the attempt to narrow the terms of  
14 reference?

15 **A.** Preparing the two sets of documentation, the first set,  
16 prepared under Susan Crichton, was to embrace the  
17 reasons for the differences.

18 The set of documentation, as I recall the new terms  
19 of reference prepared by Chris Aujard, or someone under  
20 his direction, sought to limit anything the Working  
21 Group looked at solely to the Horizon computer system.

22 **Q.** We see there it says:

23 "Responding for Post Office Chris Aujard explained  
24 that the terms of reference accurately reflected the  
25 purpose of the Working Group as explained to him when he  
149

1 that, once Susan Crichton left and Chris Aujard came,  
2 there was this change of tone?

3 **A.** The change of tone was obvious. It's not always  
4 reflected in the minutes by Belinda Crowe but, for  
5 example, at the beginning of every meeting, Sir Anthony  
6 Hooper would ask could the Post Office please explain  
7 what has happened to this money, where are the suspense  
8 account items, where has the money from subpostmasters  
9 gone? And this is only referred to in two sets of  
10 minutes, one in November 2014, and Chris Aujard says he  
11 will ask his accounts team to answer what is a really  
12 simple question, and it simply doesn't recur again.

13 But at the start of every Working Group meeting,  
14 Sir Anthony Hooper asked that question and Chris Aujard  
15 has simply blocked it and stopped anything happening  
16 with regard to revealing it. It is clear to me that  
17 he's there to close the scheme and close them down and  
18 make sure that we don't see anything that damages the  
19 Post Office brand. So, yes, it was a change of tone and  
20 it came from Chris Aujard.

21 **Q.** I'm going to look at suspense accounts later. Sticking  
22 with the terms of reference, can we bring up, please,  
23 POL00026656. So this is the notes of the meeting of  
24 7 March 2014. So we previously were at the January  
25 2014, we are now 7 March 2014. If we look down, please,  
151

1 had taken over the General Counsel and that his  
2 understanding was that the Working Group's purpose was  
3 narrower than Alan Bates had set out."

4 Pausing there, just as a slight detour, in your  
5 statement you refer to a change of tone and approach for  
6 the mediation when Chris Aujard replaced Susan Crichton.  
7 Can you explain what you mean by the change of tone?

8 **A.** Yes, Susan Crichton was a lawyer, counsel for the Post  
9 Office, who was trying to find out why differences had  
10 occurred and it was under her instigation we got two  
11 excellent investigators, Ron Warmington and Ian  
12 Henderson; it was under her instigation we had  
13 a training day for people sitting on the Working Group  
14 to understand the system. So it was kind of open  
15 environment where access was given to documents to try  
16 and find the true reason for things.

17 The second she disappeared without explanation and  
18 Chris Aujard replaced her, we had someone who appeared  
19 to be a litigation lawyer attempting to obstruct any  
20 access to documentation, slow things down, narrow the  
21 focus on to the narrowest of margins to limit damages  
22 for the Post Office. That's how it appeared to me.

23 **Q.** You appearing to be suggesting that direction came from  
24 Chris Aujard. Was that anything he said or did that  
25 made you think that, or was it just a timing matter  
150

1 to "Terms of Reference", it says:

2 "The Working Group discussed the revised terms of  
3 reference. The reworked Clause 4.9 was agreed.  
4 Clause 4.10.1 was agreed subject to the addition of the  
5 phrase 'and any associated issues' after Horizon. It  
6 was confirmed that the terms of reference allowed for  
7 different lengths of mediation. It was agreed that the  
8 Working Group should not have its own budget but would  
9 use the process set at in Section 8 where funding was  
10 required. The terms of reference were agreed."

11 Now, the inclusion there of the "and any associated  
12 issues in Horizon", was that addressing the concern you  
13 had about the narrowing of the terms of reference?

14 **A.** It was supposed to make sure the previous issues were  
15 still included in the Working Group remit.

16 **Q.** Why did you say "supposed to"?

17 **A.** Well, I don't believe it did. I mean, for example, one  
18 of the other things we discussed extensively was the  
19 retention of documents required for the cases and, bear  
20 in mind, we've got a lot more cases, we've got the 136  
21 now, which is the 150 minus the ones the Post Office  
22 objected to, and every time again we'd say, "Please  
23 don't destroy any documents", and Chris Aujard would  
24 say, "Well, if there are issues in those documents and  
25 they're more than six years old, we'll probably have  
152

1 destroyed the documents". He made no effort to retain  
2 documents.

3 **Q.** Let's look at what you say on that in your witness  
4 statement, please. It's page 16 of your witness  
5 statement -- sorry, no, it's not. It's page 28.

6 Thank you. This is a section on concerns raised at  
7 the Working Group meetings. We'll be coming back here  
8 and I'm just going to deal with the paragraph 108 first,  
9 and you say that:

10 "... Sir Anthony Hooper asked how the documents for  
11 [subpostmasters] and other affected cases were being  
12 preserved. He warned Chris Aujard not to destroy any  
13 documents at all. Chris Aujard replied to Sir Anthony  
14 Hooper that [Post Office Limited] would continue to  
15 destroy documents following its usual six-year statute  
16 of limitations document destruction policy."

17 Can we just look at some minutes on that, please,  
18 starting with POL00026640.

19 Now, as happens with some of these meetings, we have  
20 the standing agenda and attendees there. The date of  
21 the document is on the second page, so 23 January.  
22 Would that be 23rd January 2014?

23 **A.** Yes, it would. These were telephone calls. We only met  
24 in person, I think, once a month.

25 **Q.** Can we look at page 8, please under "AOB". It says:  
153

1 documentation?

2 **A.** Well, they said they'd corresponded with their previous  
3 head, covering Royal Mail, which separated in 2012, and  
4 Royal Mail had stored some documents at Iron Mountain,  
5 so presumably they told Royal Mail since 2012 and  
6 earlier not to destroy documents. It didn't affect  
7 really what the Post Office were doing with their own  
8 documents. A lot of the cases being reviewed were  
9 pre-2012, so that was relevant, but whether it was  
10 complete, I can't say.

11 **Q.** Can we bring up your witness statement, please, page 27,  
12 paragraph 101. You discuss here a practice by JFSA of  
13 retiring during discussion of individual cases, and by  
14 "retiring", do you know what I mean: not participating  
15 in the discussion?

16 **A.** We left the room.

17 **Q.** You left the room. It says:

18 "There was a development in the Working Group  
19 meetings where the originally agreed terms for the  
20 Mr Jenkins were unilaterally varied by [the Post Office]  
21 when the Working Group attempted to discuss cases where  
22 Second Sight had recommended mediation."

23 So this is Second Sight do the report, Second Sight  
24 say, "We recommend mediation", and there were situations  
25 where Post Office wanted to have a discussion as to  
155

1 "ACTION Post Office to reinforce the point that  
2 files not to be destroyed -- Note to issue in Chris  
3 Aujard's name -- including letter to Royal Mail and  
4 other relevant bodies."

5 Do you recall that being discussed?

6 **A.** Yes, it was discussed at every meeting.

7 **Q.** If we can go, please, to POL00026635, and if we can just  
8 start at page 2, to date the document, Thursday,  
9 6 February. If we go back to the front page, please, we  
10 see that you're not in attendance at this meeting.

11 **A.** No.

12 **Q.** Would you have reviewed the minutes?

13 **A.** Yes. I always reviewed the minutes when they came out.

14 **Q.** Can we turn to page 5, please, and, if we can go to the  
15 bottom of the page under 7. We have "Review of  
16 outstanding actions", and reference number 28, it's the  
17 point we went to earlier at AOB.

18 "Post Office to reinforce the point that files not  
19 to be destroyed ..."

20 It says:

21 "Update

22 "Correspondence issue to Royal Mail and from Royal  
23 Mail to Iron Mountain."

24 Was it not the case that Post Office were taking  
25 steps or saying they were taking steps not to destroy  
154

1 whether or not the Working Group actually recommended  
2 mediation; is that a fair summary?

3 **A.** Yes, except Post Office had no authority to do that.

4 **Q.** No authority to do what, sorry?

5 **A.** Well, at the point that -- the original terms of  
6 reference, before Chris Aujard's version, was that, if  
7 Second Sight, having reviewed the claim, the Post Office  
8 Inquiry report and the CRR by Second Sight, if Second  
9 Sight said it's a case fit to mediate, it should go  
10 straight to mediation. Post Office had no right or  
11 authority to interrupt the flow to mediation and have  
12 a discussion at this point.

13 **Q.** Can we look please at POL00022120. It's the same  
14 document we went to earlier, just before the break about  
15 criminal convictions. Can we turn to page 2. If we can  
16 go down there, perfect, thank you. This is describing  
17 the scheme, and the fourth paragraph down says:

18 "As a result of this investigation, Second Sight  
19 will produce a Case Review summarising its findings and  
20 a recommendation on whether the case is suitable for  
21 mediation. A copy of this case review will be provided  
22 to you."

23 Pausing there, this is aimed at an applicant  
24 subpostmaster, is it, so the "you" is the applicant?

25 **A.** Yes, this briefing document is for the claimants to make  
156

1 a claim, so it is to encourage them and explain how it  
2 will work.

3 **Q.** It then says:  
4 "The Working Group will, however, take the final  
5 decision on any cases that may not be suitable for  
6 mediation."

7 **A.** That's correct, so any case that Second Sight have  
8 rejected or can't make a decision about, the Working  
9 Group should review. Ergo, it means that any case where  
10 Second Sight say it's suitable for mediation should go  
11 straight through.

12 **Q.** Is it not the case that Second Sight would produce  
13 a recommendation, which it was intended that the Working  
14 Group would then consider and arrive at a final  
15 decision?

16 **A.** No, it wasn't. The CRR, if it recommended mediation,  
17 should go straight to mediation. It's only cases where  
18 they didn't take a final decision.

19 **Q.** Where did you get that understanding from, that that was  
20 the proper interpretation of what the Working Group's  
21 role was?

22 **A.** The Working Group will take a decision, a final  
23 decision, on any cases that may not be suitable for  
24 mediation, not on cases that are suitable for mediation.  
25 That's what it says.

157

1 power to stop them.

2 **Q.** The Working Group was chaired by Sir Anthony Hooper,  
3 a previous Court of Appeal judge, yes?

4 **A.** Yes.

5 **Q.** I think Sir Anthony Hooper was your recommendation?

6 **A.** Sir Anthony Hooper was Chairman of the Expert Witness  
7 Institute and I was his Vice Chairman. I knew him quite  
8 well.

9 **Q.** Was the purpose of appointing someone like Sir Anthony  
10 Hooper, with a legal background, to assist with  
11 resolving issues such as to whether a case should go for  
12 mediation or not?

13 **A.** No, that wasn't the main purpose, the main purpose was  
14 to find someone of great integrity and knowledge of the  
15 resolution of disputes, to make sure that the process  
16 produced by this mediation processing scheme was run  
17 fairly. I mean, it was an absolute bonus, he had  
18 substantial knowledge of criminal cases because he was  
19 able to review files where Post Office said this wasn't  
20 fit to mediate because this person was going to be  
21 prosecuted or had a criminal conviction; Sir Anthony and  
22 went and reviewed the files and, in every case, he said  
23 "That's not true, they can go through".

24 **Q.** I want to look at a few of the meetings where the issue  
25 of whether or not to mediate came up. Can we start,

159

1 **Q.** If we turn to page 8 as well, please, and "Will my case  
2 definitely be referred to mediation?" I think this is  
3 a paragraph to which Sir Alan referred in his evidence  
4 to the Inquiry. It says:  
5 "If your case is suitable and you provide accurate,  
6 detailed information to Second Sight, then this is  
7 likely in most circumstances."  
8 "However, the Working Group may consider that some  
9 cases are not suitable for mediation. For example, if  
10 there is insufficient information about a case or the  
11 case is not one requiring resolution."  
12 How does that work with your interpretation of the  
13 role of the Working Group, if it's only going to decide  
14 cases for mediation where Second Sight haven't made  
15 a recommendation?

16 **A.** The Working Group was intended to process cases and make  
17 sure they had the relevant information and inquiries  
18 made before going to mediation. My understanding, when  
19 this document was issued, is only in exceptional or  
20 strange circumstances, when Second Sight, as competent  
21 investigators, couldn't make a decision, or there was  
22 anyone sufficient evidence, would the Working Group  
23 consider the case. So it meant that the majority of  
24 cases should have rolled through to mediation, and Post  
25 Office, nor any other party around that table had the

158

1 please, with POL00026673. This is hopefully dated on  
2 the first page, it's 16 June 2014. Could we go to  
3 page 3, please, sorry, page 2. And if we could go down  
4 to point 3 at the top of the document:  
5 "Case M054 was discussed to inform a decision as to  
6 whether the Working Group should recommend the case for  
7 mediation. Second Sight had, in their final report,  
8 recommended mediation."  
9 It says:  
10 "The following points were considered during the  
11 course of the discussion:  
12 "Regardless of a decision to recommend mediation by  
13 the Working Group, either party had the right to decline  
14 to mediate."  
15 Did you disagree with that?

16 **A.** No, I think mediation has to be a consensual process.

17 **Q.** It says:  
18 "The extent to which case raises issues that had not  
19 been previously explained to the satisfaction of the  
20 applicant in the context of the benefit of mediation for  
21 the applicant in terms of being able to 'move on' after  
22 mediation from the events being mediated."  
23 What does that mean?

24 **A.** This is a particularly difficult case because it  
25 involves someone who'd suffered, I believe, criminal

160



1 conviction. I may be misremembering the number but  
 2 I think this is one where there was a criminal  
 3 conviction and there was strong opposition from Chris  
 4 Aujard in particular that you could mediate anything,  
 5 post a criminal conviction, but the financial loss was  
 6 still there, whether they were convicted of something  
 7 criminal or not, and if their conviction was based on  
 8 some misinterpretation or some plea bargain under false  
 9 circumstances with limited disclosure, we all felt that  
 10 they should still have the opportunity to go face to  
 11 face and discuss the financial issues.

12 **Q.** So was this a case where Second Sight had recommended  
 13 mediation, the JFSA were in favour of mediation but Post  
 14 Office were against mediation?

15 **A.** Yes, because there'd been a plea bargain in this case,  
 16 if I'm, again, interpreting the number correctly and  
 17 this individual had plea bargained to false accounting  
 18 to avoid a theft charge and going to prison. But  
 19 whether they'd actually done false accounting or not was  
 20 pretty dubious.

21 **Q.** If we go to the bottom of the page, it says:  
 22 "It being apparent that the matter of whether the  
 23 Working Group should recommend M054 for mediation might  
 24 proceed to a vote, the Working Group agreed the test the  
 25 Chair should consider if called upon to use his casting  
 161

1 engaging in the debate and the vote at the time?

2 **A.** Yes.

3 **Q.** Can we look, please, to POL00026665. So we've got  
 4 a minute of the call on 26 June, which we see you're in  
 5 attendance at. Please can we go to page 8. So we have  
 6 M054, that's the case we were just discussing, and it  
 7 says:  
 8 "[The] Chair asked all parties to consider the steps  
 9 to be taken to inform applicant of the decision not to  
 10 mediate the case."  
 11 So it appears that that Sir Anthony Hooper had  
 12 decided against recommending mediation in this case; is  
 13 that correct?

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

15 **Q.** "KL", I assume that's you?

16 **A.** Yes.

17 **Q.** "... raised a concern about sharing the Chair's decision  
 18 ... The Chair noted this concern ..."  
 19 Then it says "AB", presumably that's Sir Alan?

20 **A.** It is.

21 **Q.** "... voiced concern about the additional time delay this  
 22 would cause the applicant, but agreed that the [Working  
 23 Group] should take time to consider how to proceed in  
 24 this case."  
 25 Can we scroll down, please. We see at the bottom  
 163

1 vote as:  
 2 "On the assumption that both parties approach  
 3 mediation in a genuine attempt to reconcile their  
 4 differences. Is it reasonably likely that the parties  
 5 will reach an agreed resolution of their issues!."  
 6 Then, over the page, it says:  
 7 "The Working Group moved on to a vote. Post Office  
 8 voted against ... JFSA voted for.  
 9 "... the Chair undertook to decide the matter and  
 10 provide the Working Group with his reasoned, written  
 11 decision."  
 12 So, at this point, were the JFSA engaging in  
 13 a position where the Working Group were going to  
 14 determine whether or not to recommend a mediation in  
 15 circumstances where Second Sight had recommended  
 16 mediation?

17 **A.** Yes.

18 **Q.** Why was that?

19 **A.** Because this is, I think, one of the first times this  
 20 occurs, and it was somewhat of a curveball because we'd  
 21 previously understood the scheme, if mediation was  
 22 recommended it would go through. Post Office strongly  
 23 objected and indicated they wouldn't take part in  
 24 a mediation.

25 **Q.** So is your evidence this was being caught off guard but  
 162

1 "AB" again:  
 2 "AB queried the role of the [Working Group] in the  
 3 recommendation to mediate when [Second Sight] had  
 4 recommended mediation. It was noted that this was the  
 5 previously agreed process, and the one followed [in]  
 6 M054."  
 7 Do you recall the discussion that led to this  
 8 minute?

9 **A.** Yes. This is the point at which -- we objected, really,  
 10 to the intrusion of the Working Group committee into the  
 11 recommendations by Second Sight. It was clearly going  
 12 to cause delay and distress for the applicants when they  
 13 had cleared the hurdle of proving there was a dispute  
 14 that could be mediated.

15 **Q.** When it was said, "It was noted that this was the  
 16 previously agreed process, and the one followed for  
 17 M054", at that stage, were you in agreement that M054  
 18 had followed a previously agreed process?

19 **A.** No. That's the point. Belinda Crowe has written this  
 20 minute. The first half of -- the first half of the  
 21 second sentence belongs with the first:  
 22 "AB queried the role of the Working Group in  
 23 recommendation to mediate when [Second Sight] has  
 24 recommended mediation, which was noted [was the previous  
 25 agreed process. Stop. This was different for the  
 164

1 followed for M054]."

2 **Q.** That can come down, thank you. I don't propose to take  
3 you to minutes of other Working Group meetings but  
4 I can, if you like. They showed, as you said earlier,  
5 that JFSA, from then on, would leave the room or not  
6 participate in discussions when the Working Group were  
7 deciding whether or not to recommend a case for  
8 mediation.

9 **A.** That's correct. I mean, the latter meetings were held  
10 at Matrix Chambers, rather than Bond Dickinson Wombles  
11 (*sic*) office but we left the room, and sometimes the  
12 building, until they'd finished dealing with their  
13 interference in the Scheme because, frankly, it was  
14 a power the Working Group did not have, whatever  
15 Chris Aujard's explanation was when he joined Post  
16 Office.

17 **Q.** Was it a case that Sir Anthony tried to encourage the  
18 JFSA to stay for that discussion?

19 **A.** He did but I don't criticise him for that. He simply  
20 wanted a straightforward way forward for the claimants  
21 who were being caught up in this battle.

22 **Q.** Could you explain the basis on which, or the reasons  
23 for, not participating in those discussions, other  
24 than -- you've given evidence that it wasn't the agreed  
25 process. Were there any further reasons for not  
165

1 Office.

2 **Q.** You say in your statement -- and we'll come to the email  
3 shortly -- that you've now seen an extremely inaccurate  
4 file note of that conversation. When did you first see  
5 what you describe as the inaccurate file note?

6 **A.** In the papers for this Inquiry.

7 **Q.** Before seeing what you describe as the file note, would  
8 you have recollected this conversation with Paula  
9 Vennells?

10 **A.** Yes, I remember meeting her at the airport and bearding  
11 her, if that's the correct phrase, with some sort of  
12 encouragement for her to settle and at least face up to  
13 the claimants and explain to them what had happened, and  
14 pay them back their money.

15 **Q.** Let's look at the note, actually. We'll go straight  
16 there. It's POL00101367. It's an email from Paula  
17 Vennells to Chris Aujard. It's on 17 September, so this  
18 is made on the day of the meeting; is that right?

19 **A.** It's -- 17 September is when I saw her at Bonn airport.

20 **Q.** Do you remember roughly what time the meeting was?

21 **A.** No, I can't. It was in the morning or around lunchtime,  
22 at a guess.

23 **Q.** But you would accept that this is a contemporaneous  
24 account? I appreciate you dispute the accuracy of it  
25 but it was made on the day of the meeting?  
167

1 participating in the discussion?

2 **A.** Not only was it not the agreed process; it was not what  
3 had been advertised to the claimants when they made  
4 an application to join the scheme. Once you joined  
5 a scheme and the rules are set, you can't then do what  
6 Post Office often did, which is slip change into some  
7 other shape, so you do something different, you've got  
8 the people on Board, so then suddenly they're not going  
9 off to Clacton-on-Sea, they're off to Scarborough.

10 **Q.** I want to move on, still in the time of the Working  
11 Group but could we bring up your statement, please, at  
12 paragraph 91, which is page 24.

13 **A.** Is this the second 91?

14 **Q.** You're quite right; it is the second 91.

15 **A.** Apologies for that.

16 **Q.** None needed. When it arrives on the screen, it is the  
17 meeting with Paula Vennells.

18 Sorry -- yes, if we can go to the bottom of the  
19 page, please.

20 So this refers to a meeting you had -- I think it's  
21 a coincidental meeting where you bumped into Paula  
22 Vennells at Bonn airport in Germany on 17 September  
23 2014.

24 **A.** Yes, I was waiting for my flight by the gate and she  
25 hove into view with two other people from the Post  
166

1 **A.** Well, it appears Ms Vennells has sent an email on the  
2 same day, yes.

3 **Q.** It refers to just bumping into you at Bonn airport:  
4 "... had a chat together. Off the record but of  
5 course not really."

6 Do you know what that means or what would lead to  
7 that impression?

8 **A.** Well, I did say that, I said, you know, "Paula can  
9 I have a word off the record because I do think you need  
10 to settle this because the subpostmasters need their  
11 money back, and they ought to have some sort of  
12 face-to-face explanation to explain why they've been  
13 treated so badly for so long, and if you don't settle  
14 this, you'll regret it".

15 **Q.** It says -- I'm not going to go through all of the  
16 document, I think it's the fourth bullet point down:  
17 "Can we get Angela to lead on mediations?  
18 Particularly if we think we are unlikely to move our  
19 position. Kay's view is that she is credible,  
20 understandable (v important) and stands the best chance  
21 of getting people on side or at least to feel they have  
22 been listened to, even if they still disagree."

23 Now, taking it in stages, is Angela, in that bullet  
24 point, referring to Angela van den Bogerd?

25 **A.** Definitely Angela van den Bogerd.  
168

1 **Q.** Did you discuss Angela van den Bogerd in your meeting  
 2 with Paula Vennells?  
 3 **A.** Yes, we did, because she was getting to the bottom of  
 4 an investigation, which seemed to have been carried out  
 5 for the first time on any of the applicants' cases, and  
 6 we were actually finding out why the differences had  
 7 occurred. So she was very thorough, easy to understand  
 8 in her explanations of how differences arose and, if you  
 9 cut her in half, she'd be Post Office through and  
 10 through.  
 11 **Q.** Did you say that, about being Post Office through and  
 12 through?  
 13 **A.** No, I did not say that to Paula Vennells.  
 14 **Q.** So the point that "Kay's view is she is credible,  
 15 understandable", is that a fair comment for Paula  
 16 Vennells to have made?  
 17 **A.** Concerning the investigation of differences in the  
 18 network, yes, but not generally.  
 19 **Q.** She said:  
 20 "We should consider being more open to mediation on  
 21 the cases where more money was at stake not less.  
 22 Because this had a greater impact on those affected  
 23 (lost jobs, homes, etc) and therefore, they are the ones  
 24 who need to vent more. And who will benefit from us  
 25 allowing them to 'yell' at us (she thinks we're big  
 169

1 note, and I thought they could have been more  
 2 sympathetic than taking someone into her home and  
 3 interviewing her without anyone else present and  
 4 attempting to take her goods, which was prevented by her  
 5 mother.  
 6 I don't remember saying Jo had evidence that they  
 7 hadn't got at the time of prosecution. I probably did  
 8 say Jo should have had information disclosed by Post  
 9 Office that wasn't available at the time of prosecution.  
 10 This is a complete misrepresentation of what I said.  
 11 **Q.** Would you have said, as part of the discussion  
 12 generally, about the fact of a guilty plea, whether or  
 13 not you agreed with that guilty plea? Would you have  
 14 mentioned that?  
 15 **A.** No, I don't believe we discussed prosecutions or guilty  
 16 pleas, as far as I recall. My notes of this  
 17 conversation have not been reduced to a file note at the  
 18 time. They were in passing at an airport.  
 19 **Q.** Thank you. That document can come down.  
 20 I want to go back to one of the two points you  
 21 raised, and one of them I said I'd come back to. It's  
 22 page 28 of your statement, please, paragraph 107, and,  
 23 if we could go to the bottom, please. Thank you.  
 24 These are two of the concerns that you raised here.  
 25 We looked at 108 earlier; 107 is the question, "Where  
 171

1 enough to take that)."  
 2 **A.** Where on earth has that come from?  
 3 **Q.** That was about to be my question: from what was said --  
 4 or do you recall anything being said at the meeting that  
 5 would lead to this note being made?  
 6 **A.** No.  
 7 **Q.** We then have, it says, "Jo Harrison (JA SPMR)". Now  
 8 that means presumably Jo Hamilton, James Arbuthnot,  
 9 subpostmaster?  
 10 **A.** Yes, I'm pretty certain it's Hamilton, not Harrison.  
 11 **Q.** "... Kay intends to go into mediation with her -- she  
 12 thinks she needs looking after. Kay indicated that Jo  
 13 had done something wrong but feels sorry for her ..."  
 14 Now, I'm going to pause there because I know you  
 15 dispute that. What is your recollection of what was  
 16 said about Jo Hamilton at this meeting?  
 17 **A.** My recollection is I said the system was such that Jo  
 18 had been muddled and concerned, very upset and had had  
 19 to roll over a difference which Angela had said, when we  
 20 discussed M035, that was a reason she couldn't get to  
 21 the bottom of the reasons for the difference because it  
 22 had been rolled forwards over so many periods.  
 23 I didn't feel sorry for Jo. I did say she might  
 24 have got out of her depth with the system but she didn't  
 25 have any documentation to check, which isn't in the  
 170

1 has the [subpostmasters'] money gone?" You say that  
 2 Sir Anthony Hooper asked that question regularly.  
 3 **A.** Yes, he did.  
 4 **Q.** Now, you say at the end of that paragraph:  
 5 "[Post Office] failed to provide any explanation or  
 6 figures at all."  
 7 That's in relation to "Where's the money gone?":  
 8 "Chris Aujard said he would get this information on  
 9 several occasions but [he] never did."  
 10 I just want to look at a few of the meetings on this  
 11 issue and could we start, please, with POL00026685.  
 12 This is a meeting on 16 September 2014. We see you're  
 13 in attendance. Could we look at page 6, please and, if  
 14 we go down to "Suspense account paper", thank you.  
 15 So "Suspense account paper". Now, you do say in  
 16 your witness statement that there are at least two types  
 17 of suspense account potentially relevant. What type of  
 18 suspense account was being discussed here?  
 19 **A.** We should be discussing what I would call the head  
 20 office suspense account, where differences were posted  
 21 in the main Post Office Limited accounting system, and  
 22 I would expect it to include things like the differences  
 23 on reconciling Camelot or Bank of Ireland control  
 24 accounts. But it must be that place where the  
 25 subpostmaster's money had gone and I know, talking to  
 172

1 Ron and Ian at the Working Group, they definitely  
2 volunteered many times to go to Chesterfield, or  
3 wherever the accounts were held, and have a look for  
4 themselves to actually ascertain what had happened to  
5 the money.

6 Chris Aujard, on many occasions, confirmed that  
7 wasn't necessary, it was too complicated, they weren't  
8 going to be paid for it, and he would produce a paper  
9 from his accounts team asking the CFA. I've no idea  
10 what this paper was but I don't believe it was  
11 a substantial explanation.

12 **Q.** But this part here where Post Office explained they  
13 provided with a paper, you say you don't know what that  
14 was?

15 **A.** No, I've never seen it.

16 **Q.** "Post Office explained that this request was too broad  
17 and they could not see how it linked to any case that  
18 Second Sight investigating. Second Sight undertook to  
19 provide their further specific question(s) in writing to  
20 Post Office."

21 Could we look at the meeting on 17 October, which is  
22 POL00040475. It is 18 October, as I say. Can we go to  
23 page 2, please. This is referring back to the minutes  
24 of 16 September meeting. This is:

25 "Referring to page 6, item 5 Second Sight had  
173

1 Update on Part Two Report". So that's the Second Sight  
2 Part Two Report.

3 **A.** Yes.

4 **Q.** The Chair asks for an update on progress of various  
5 matters and, at the bottom, we see:

6 "The Chair asked if Post Office was able to answer  
7 the question on suspense accounts that had been posed  
8 for several months. Ian reported that the information  
9 had not yet been provided. The Chair asked that this be  
10 addressed as a matter of urgency and suggested that Post  
11 Office arrange a meeting between Second Sight and Post  
12 Office Finance staff to do so."

13 Now, the Inquiry has heard evidence, and there's  
14 documentary evidence, on matters that happened  
15 thereafter. My question to you is: were you involved at  
16 all in this investigation into suspense accounts?

17 **A.** No, I was not.

18 **Q.** Did Ron Warmington or Ian Henderson tell you anything  
19 following this meeting about that investigation?

20 **A.** "In about 2015 [I brought the paper to remind me] I was  
21 told by Ian Henderson that the amounts credited to the  
22 profit and loss account of Post Office in 2010/11 was  
23 £612,000; in 2011/12 was £207,000; in 2012/13 was  
24 £234,000; and in 2013/14 was £104,000."

25 **Q.** Can I ask you're reading from a document, is that a note  
175

1 written to Post Office with questions on the suspense  
2 account but are yet to receive a response. The Chair  
3 noted the complexity of the questions. He asked if  
4 there was a surplus in the account would it be taken  
5 into Post Office income. Post Office confirmed that it  
6 would after 3 years. Post Office and Second Sight  
7 agreed to clarify Second Sight's precise needs for  
8 information.

9 "... The Chair asked Post Office for figures taken  
10 into income from the suspense account to be broken down  
11 year by year."

12 Now, firstly, do you recall this conversation beyond  
13 what's recorded in the minutes?

14 **A.** I remember a November 2014 minute where Chris Aujard  
15 gave a specific undertaking, I can't remember the  
16 wording, and that information was never followed up.  
17 But I know, to my own -- from my own investigations that  
18 there were amounts of over £1 million pounds taken to  
19 the Post Office profit and loss account over a five-year  
20 period.

21 **Q.** I think you have answered the question I was about to  
22 ask on what came next, and we're going to jump forward  
23 to 14 January, please. POL00043633. We see 14 January  
24 2015. Can we go, please, to page 3, and to the bottom  
25 of the page. Thank you. It's "Additional Agenda Item:  
174

1 of a conversation that --

2 **A.** It's a note of a conversation I had and I highlighted it  
3 in yellow so I could find it.

4 **Q.** So that's -- sorry, it's gone off my -- that was Ian  
5 Henderson who told you that?

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

7 **Q.** Did you have any further involvement in investigating  
8 suspense accounts?

9 **A.** There was no opportunity because the Mediation Working  
10 Scheme was cancelled unilaterally by Post Office without  
11 that question ever being answered.

12 **Q.** I want to now turn to my final topic, what happened  
13 thereafter, and the Group Litigation --

14 **SIR WYN WILLIAMS:** Before you do, am I right in thinking  
15 that either Mr Henderson or Mr Warmington had in their  
16 witness statement, when they gave evidence, figures  
17 either identical to, or very similar to, the ones which  
18 Ms Linnell has just referred to?

19 **MR STEVENS:** Sir, off the top of my head, I couldn't say  
20 with confidence but, at the break, we'll double check  
21 that point.

22 **SIR WYN WILLIAMS:** Okay, I don't think I'm imagining that,  
23 that's all.

24 **A.** If it assists, they're in the published accounts.

25 **SIR WYN WILLIAMS:** Right. So there's a public record of  
176

1 them somewhere, anyway?

2 **MR STEVENS:** Yes.

3 **SIR WYN WILLIAMS:** Fine. Well, you needn't go researching

4 then, Mr Stevens.

5 **MR STEVENS:** Thank you. It shows a confidence in my memory.

6 Turning, then, to the litigation, please. I asked

7 earlier about the prospect of litigation in 2012 and my

8 understanding of your answer was that you need funding

9 for litigation --

10 **A.** Yes.

11 **Q.** -- and, in order to get funding, you needed to have

12 sufficient information to show a basis to put forward

13 your claim?

14 **A.** Yeah, and a reasonable chance of success or no sensible

15 lawyer would take it on.

16 **Q.** I'm now going to ask you some questions about the

17 process of litigation but, remember, I'm not asking you

18 anything which would require you to provide privileged

19 information, unless you were in a position to waive it

20 and you wanted to waive it.

21 **A.** Thank you.

22 **Q.** Once the Mediation Scheme had finished, so in 2015 --

23 **A.** It was abruptly ended by Post Office in 2015 and I had

24 a letter from Jane MacLeod out of the blue.

25 **Q.** -- how easy or difficult was it for you to find legal

177

1 been able to process either, and the funders recognised

2 the importance of having after-the-event insurance for

3 people in our claimants' position. So we had to put all

4 those four pieces in place before proceeding to

5 litigation.

6 **Q.** Just for the benefit of the public, when you say

7 "after-the-event insurer", do you mean an insurer who

8 would indemnify the claimants if the litigation was

9 unsuccessful and a costs order was made against them?

10 **A.** If you look at the case of Lee Castleton, it's very

11 clear. If you lose in a court and the court has the

12 power to award costs against you, it can have severe

13 financial implications. The purpose of after-the-event

14 insurance is to put an insurance policy in place so, if

15 you lose, the insurance policy coughs up and pays the

16 costs.

17 **Q.** So, as I understand it, you say the sort of essential

18 ingredients were: (a) Therium or a litigation funder;

19 (b) the after-the-event insurer; and (c) solicitors and

20 barristers who were prepared to take a portion of their

21 fees on a conditional fee basis, or a no-win-no-fee

22 basis?

23 **A.** Yes, and bearing in mind all are essential, so you could

24 take them all as one. There is no priority in that

25 listing. And to get the solicitors and barristers

179

1 representation for the Group Litigation?

2 **A.** Sir Alan and I did several things at the end of the

3 Mediation Scheme. First of all, we had a look at the

4 evidence that had been produced by the Post Office and

5 Angela van den Bogerd. We also -- without wishing to

6 pierce privilege of mediation discussions -- had some

7 general feedback from those people who had been

8 fortunate enough to reach the mediation panel. And,

9 thirdly, we started putting together a panel of

10 potential lawyers who had experience in Group

11 Litigation.

12 We then went to several firms of lawyers and, as

13 happenstance would have it, we ended up with Freeths,

14 who also introduced us to litigation funders,

15 after-the-event insurers and counsel, Henderson

16 Chambers.

17 **Q.** It's well known that the litigation was funded by

18 a litigation funder, Therium?

19 **A.** Therium were the funders, yes.

20 **Q.** If you hadn't had funding by way of a funder such as

21 Therium, would the GLO claimants have been able to

22 pursue the litigation?

23 **A.** No, they wouldn't and if they hadn't had generous

24 solicitors and counsel, prepared to take a proportion on

25 a conditional fee/success arrangement, we wouldn't have

178

1 interested, you have to have sufficient evidence to

2 prove that something has been done wrong and there is

3 similarity across a group of claimants, so that there

4 are sufficient to actually put a force together to form

5 a group litigation group. Quite high hurdles to

6 overcome.

7 **Q.** Just rounding this off, the information that you were

8 able to obtain and put forward to the solicitors and

9 barristers to get them interested, did that come from

10 the Mediation Scheme?

11 **A.** Yes. One of the things about going into the Mediation

12 Scheme -- because, normally, anything discovered in the

13 mediation is privileged and within the bubble of

14 mediation, but one of the things JFSA managed to

15 negotiate is any document disclosed in the mediation

16 would be usable by the claimant person. So yes, that's

17 where the data came from to enable litigation to take

18 place.

19 **Q.** Before I ask you another question about the GLO, then,

20 to what extent, if at all, do you think the Mediation

21 Scheme fulfilled its purpose?

22 **A.** At least 85 or 90 per cent. Without the Mediation

23 Scheme, there wouldn't have been the volume and the

24 capacity of claimants to go forward because Post Office

25 has, throughout my involvement with them, deliberately

180

1 or otherwise withheld documents that are essential for  
 2 the defence of individuals or the prosecution of  
 3 a claim.

4 **Q.** Can we look at page 31 of your statement.

5 **SIR WYN WILLIAMS:** So, again, Mr Stevens, sorry. But, if it  
 6 be the case that the Post Office was seeking to use the  
 7 Mediation Scheme as a sham, to use that word, in fact,  
 8 on your view of it, it had the opposite effect because  
 9 it provided you with the ammunition for the litigation  
 10 that followed?

11 **A.** Yes, that's exactly right.

12 **SIR WYN WILLIAMS:** Fine. Okay.

13 **MR STEVENS:** At paragraph 119 and 120, you say:  
 14 "The Freeths legal team put in place all the  
 15 necessary mechanisms and steps to cope with and respond  
 16 to the aggressive [Post Office] litigation strategy,  
 17 which in my view and the view of others, was primarily  
 18 designed to run the [Group Litigation] claimants out of  
 19 funding. Mr Justice Fraser refers to this in his  
 20 judgment by implication."  
 21 You go on to specify what you saw as the aggressive  
 22 litigation tactics by saying:  
 23 "[They] included limited and sporadic late  
 24 disclosure, contested costs applications and other  
 25 litigation 'tricks' such as [Post Office's] recusal  
 181

1 on the Horizon system, add huge legal costs to our side  
 2 and try and derail the whole process.

3 **Q.** Did you speak to other people in the claimant group  
 4 about the fact of the recusal application being made?

5 **A.** I certainly did because people wanted to understand what  
 6 it was.

7 **Q.** Can you summarise what the general feeling was within  
 8 the claimant group about the application having been  
 9 made?

10 **A.** I can only say this from my personal point of view.  
 11 I think there was some anger and frustration, as yet  
 12 another tactic by Post Office stopped the move slowly  
 13 towards redress, justice and some sort of conclusion as  
 14 to what had happened to them.

15 **Q.** The final question, or possibly questions, I ask is  
 16 about interaction with Government. Now, when Sir Alan  
 17 gave evidence, Mr Beer presented a series of letters  
 18 that he had sent to ministers and went through various  
 19 meetings. Did you have any interactions with Government  
 20 or Government Ministers in respect of the Horizon IT  
 21 System?

22 **A.** Sir Alan and I decided that he should write the letters.  
 23 We discussed the contents before they were sent. In  
 24 particular, I was a part of his issuing of a bill to,  
 25 I think, the Prime Minister at the time, Boris Johnson,  
 183

1 application to derail the planned five trial  
 2 litigation."

3 I want to just focus on one aspect of that, and  
 4 that's the recusal application. Were you in court when  
 5 the recusal application was announced?

6 **A.** Yes, I was.

7 **Q.** What was your reaction to that?

8 **A.** It happened after lunch, in the middle of someone's  
 9 testimony. I think Mr de Garr Robinson stood up and  
 10 made the application. Fraser J insisted the witness was  
 11 completed before he dealt with it, which was kind,  
 12 because, otherwise, the witness would have been held  
 13 over indefinitely, and I think it was an absolutely  
 14 shocking result because it was the tactics of  
 15 a desperate, drowning man, as far as I could see, to  
 16 recuse a judge who had been no more than colourful in  
 17 his language and comparatives.

18 It was the handing down of this judgment that same  
 19 morning, and there were phrases in it which clearly the  
 20 Post Office and their Legal Team objected to, such as  
 21 "The Flat Earth Society", and things like that. And  
 22 I think it was absolutely disgraceful because there was  
 23 no bias that I could see in that judgment. However, I'm  
 24 not a lawyer, I'm a mere accountant. But I thought it  
 25 was a disgraceful tactic and designed to stop the trial  
 182

1 concerning the litigation costs of 46 million plus  
 2 interest.

3 **MR STEVENS:** Thank you.

4 Sir, before I -- famous last words, saying it was my  
 5 last question. If I may just have a moment to check  
 6 a note. *(Pause)*

7 Thank you, sir. I do actually have one further  
 8 question and it's going right back to the start of your  
 9 evidence, when you referred to working for a firm called  
 10 BDO.

11 **A.** Yes.

12 **Q.** We've heard evidence about Lee Castleton's civil case,  
 13 and an expert report being produced to Womble Bond  
 14 Dickinson, not disclosed in the hearing, by BDO Stoy  
 15 Hayward. Did you have any involvement in the Lee  
 16 Castleton case at all?

17 **A.** No, I really wasn't aware of Lee Castleton's case until  
 18 I met Alan Bates and we went into this process.

19 **Q.** I'm not suggesting it's necessarily the same firm.  
 20 I just wanted --

21 **A.** It will be the same firm, because Stoy Hayward and BDO,  
 22 which was formerly BDO Binder Hamlyn, amalgamated at  
 23 some point but I wasn't involved in such high echelons  
 24 of the firm to know anything about that.

25 **MR STEVENS:** Thank you.  
 184

1 Sir, those are the questions I have.  
2 Now, Ms Linnell is represented by Mr Stein and would  
3 he like to ask questions in re-examination under Rule  
4 10(2) which, subject to your approval, I think, is open  
5 to them. I think if we are doing that, though, first,  
6 I will check if there are other Core Participants who  
7 wish to ask questions?  
8 No, sir. I think Mr Stein has two questions.

9 **SIR WYN WILLIAMS:** Literally two, Mr Stein?  
10 **MR STEIN:** Two topics, sir.  
11 **MR STEVENS:** Sorry.  
12 **SIR WYN WILLIAMS:** No, I'm just concerned about the  
13 shorthand writer, that's all. If you're going to be  
14 literally a few minutes, I'm sure she'd prefer to finish  
15 but, if it's more than that, we'll ask her which she'd  
16 prefer.  
17 **MR STEIN:** Our shorthand-writer is confirming that if it's  
18 a few minutes then to go ahead, and it will be, sir.

19 **SIR WYN WILLIAMS:** Fine.  
20 **Questioned by MR STEIN**  
21 **MR STEIN:** Sir, the reference in Mr Warmington's statement  
22 to the suspense account monies is his statement  
23 WITN01050200, page 7, paragraph 12, and the figure of  
24 £612,000 is given. You'll recall I asked him questions  
25 about that matter, and he referred to other sums.

185

1 **A.** The feeling among people I spoke to who were SPMs is  
2 that the National Federation of SubPostmasters were no  
3 more than part of Post Office and not to be trusted.

4 **MR STEIN:** Sir, thank you.  
5 **SIR WYN WILLIAMS:** Well, first of all, should I be calling  
6 you "Dr Linnell"?

7 **THE WITNESS:** You could, sir.  
8 **SIR WYN WILLIAMS:** Well, hidden amongst your witness  
9 statement was a reference to you becoming a doctor in  
10 2024. So, Dr Linnell, thank you very much for your  
11 witness statement and thank you very much for giving  
12 evidence before me this afternoon.

13 **THE WITNESS:** Thank you, sir.  
14 **MR STEVENS:** Thank you, sir.  
15 I apologise for repeatedly saying "Ms Linnell" all  
16 the way through.

17 **THE WITNESS:** No, no, I'm happy.  
18 **SIR WYN WILLIAMS:** I'd just like everybody to know that I do  
19 read the lines of the witness statement, Mr Stevens.  
20 That's all.

21 Thank you very much, everyone.  
22 9.45 tomorrow, yes?

23 **MR STEVENS:** Yes, sir. Thank you.  
24 **(4.06 pm)**  
25 **(The hearing adjourned until 9.45 am the following day)**

187

1 **SIR WYN WILLIAMS:** Yes.  
2 **MR STEIN:** Ms Linnell, just two topics, as mentioned to  
3 Sir Wyn.  
4 You were asked a question by Mr Stevens about your  
5 first joining meetings of the JFSA and we all know from  
6 the ITV drama that the meetings were sometimes at  
7 village halls -- Fenny Compton, famously, otherwise at  
8 Kineton on occasions.  
9 Now, regarding funding, which is what you were asked  
10 by Mr Stevens, how broke were the subpostmasters that  
11 you met at these meetings?  
12 **A.** Very broke and in "minus red land", as my friend used to  
13 call it, with lots of credit card and other debts  
14 hanging around them.  
15 **Q.** Sometimes, in relation to your support of  
16 subpostmasters/mistresses working with Mrs Jeremiah, you  
17 were helping them try and make their way through the  
18 mess that had been made of their finances. That needed,  
19 on occasions, to get things like bank statements, which  
20 aren't necessarily free; how did you manage to do that?  
21 **A.** Barbara and I paid for them.  
22 **Q.** Another question asked by Mr Stevens was regarding the  
23 JFSA and whether it engaged with the National Federation  
24 of SubPostmasters. Was there any desire amongst the  
25 people that you met at the JFSA to engage with the NFSP?

186

**INDEX**

GRAHAM WARD (re-sworn) ..... 1  
Questioned by MR BEER ..... 1  
ANTHONY PAUL KEARNS (sworn) ..... 37  
Questioned by MS HODGE ..... 37  
Questioned by MR STEIN ..... 89  
Questioned by MS WATT ..... 95  
DR KAY CATHERINE SHEILA HILARY LINNELL 106  
(sworn)  
Questioned by MR STEVENS ..... 106  
Questioned by MR STEIN ..... 185

188

|  |   |   |  |   |
|--|---|---|--|---|
| <p><b>MR BEER: [10]</b> 1/3<br/>1/5 1/7 3/3 28/13<br/>28/15 36/11 36/15<br/>36/22 37/1</p> <p><b>MR STEIN: [9]</b> 89/10<br/>89/19 89/21 95/2<br/>185/10 185/17 185/21<br/>186/2 187/4</p> <p><b>MR STEVENS: [18]</b><br/>106/17 106/19 106/24<br/>118/14 145/23 146/2<br/>146/4 146/8 146/10<br/>176/19 177/2 177/5<br/>181/13 184/3 184/25<br/>185/11 187/14 187/23</p> <p><b>MS HODGE: [18]</b><br/>37/6 37/8 37/10 37/13<br/>84/3 84/10 84/14<br/>84/16 88/8 88/13<br/>88/16 88/22 89/4 89/9<br/>105/24 106/3 106/10<br/>106/12</p> <p><b>MS WATT: [3]</b> 95/5<br/>100/9 105/21</p> <p><b>SIR WYN WILLIAMS: [52]</b> 1/4 1/9 1/12<br/>1/18 2/20 2/25 3/2<br/>28/11 28/14 36/14<br/>36/18 36/24 37/2 37/7<br/>37/9 84/8 84/15 88/12<br/>88/15 88/21 89/1 89/8<br/>89/18 95/3 99/2 99/12<br/>99/25 100/7 105/22<br/>106/2 106/6 106/11<br/>106/13 106/18 106/21<br/>118/10 145/25 146/3<br/>146/9 176/14 176/22<br/>176/25 177/3 181/5<br/>181/12 185/9 185/12<br/>185/19 186/1 187/5<br/>187/8 187/18</p> <p><b>THE WITNESS: [4]</b><br/>1/6 187/7 187/13<br/>187/17</p> <hr/> <p><b>'80s [2]</b> 109/24<br/>109/25</p> <p><b>'80s/early [2]</b> 109/24<br/>109/25</p> <p><b>'90s [2]</b> 109/24<br/>109/25</p> <p><b>'97 [1]</b> 83/2</p> <p><b>'99 [1]</b> 56/14</p> <p><b>'Also [1]</b> 8/18</p> <p><b>'and [1]</b> 152/5</p> <p><b>'any [1]</b> 10/24</p> <p><b>'ARQs [1]</b> 5/8</p> <p><b>'Both [1]</b> 5/10</p> <p><b>'bugs' [1]</b> 137/3</p> <p><b>'Can [2]</b> 7/15 12/14</p> <p><b>'commercial [1]</b> 80/6</p> | <p><b>'Declined [1]</b> 8/6</p> <p><b>'definitely' [1]</b> 15/20</p> <p><b>'encourage' [1]</b> 80/16</p> <p><b>'following' [1]</b> 8/2</p> <p><b>'form' [1]</b> 78/12</p> <p><b>'from' [1]</b> 78/12</p> <p><b>'Horizon' [1]</b> 122/5</p> <p><b>'How [1]</b> 8/9</p> <p><b>'I [1]</b> 16/5</p> <p><b>'I was [1]</b> 16/5</p> <p><b>'I've [1]</b> 7/24</p> <p><b>'If [1]</b> 16/12</p> <p><b>'Justice [1]</b> 85/25</p> <p><b>'Losses [1]</b> 50/18</p> <p><b>'maybe' [1]</b> 15/19</p> <p><b>'move [1]</b> 160/21</p> <p><b>'NFSP [1]</b> 79/11</p> <p><b>'Nil' [1]</b> 24/17</p> <p><b>'No [2]</b> 8/5 10/22</p> <p><b>'On [2]</b> 5/16 162/2</p> <p><b>'PO [1]</b> 78/18</p> <p><b>'raising [1]</b> 149/1</p> <p><b>'should [1]</b> 80/12</p> <p><b>'Such [1]</b> 9/13</p> <p><b>'system [9]</b> 8/19<br/>13/22 14/25 18/5<br/>20/18 21/1 33/13 34/9<br/>34/23</p> <p><b>'systemic [1]</b> 121/7</p> <p><b>'systems [1]</b> 121/4</p> <p><b>'the [2]</b> 79/16 127/11</p> <p><b>'There [4]</b> 8/7 9/10<br/>16/8 16/10</p> <p><b>'These [1]</b> 6/14</p> <p><b>'This [3]</b> 13/15 13/18<br/>17/10</p> <p><b>'Three [1]</b> 8/3</p> <p><b>'Transaction [1]</b> 17/1</p> <p><b>'tricks' [1]</b> 181/25</p> <p><b>'up [1]</b> 78/2</p> <p><b>'We [1]</b> 5/22</p> <p><b>'yell' [1]</b> 169/25</p> <hr/> <p><b>' [1]</b> 13/21</p> <p><b>... [6]</b> 5/12 7/2 9/11<br/>12/15 13/15 16/10</p> <hr/> <p><b>0</b></p> <p><b>01/11/04 [1]</b> 5/24</p> <p><b>04 [1]</b> 5/24</p> <p><b>05 [1]</b> 5/24</p> <hr/> <p><b>1</b></p> <p><b>1 February [3]</b> 3/6<br/>3/12 4/20</p> <p><b>1 million [2]</b> 78/19<br/>174/18</p> <p><b>1.40 [2]</b> 106/11<br/>106/16</p> <p><b>1.5 million [1]</b> 78/15</p> <p><b>1.5 million' [1]</b> 78/3</p> <p><b>10 [7]</b> 10/14 29/20<br/>29/22 30/20 32/5</p> | <p>81/25 185/4</p> <p><b>10 March [2]</b> 7/3 7/10</p> <p><b>10.21 [2]</b> 23/15 23/17</p> <p><b>10.28 [1]</b> 23/6</p> <p><b>10.37 [1]</b> 37/3</p> <p><b>10.50 [2]</b> 37/1 37/2</p> <p><b>10.52 [1]</b> 37/5</p> <p><b>100 [2]</b> 120/18 133/1</p> <p><b>101 [1]</b> 155/12</p> <p><b>104,000 [1]</b> 175/24</p> <p><b>107 [2]</b> 171/22<br/>171/25</p> <p><b>108 [2]</b> 153/8 171/25</p> <p><b>11 [6]</b> 61/9 92/11<br/>120/24 142/25 143/6<br/>175/22</p> <p><b>11 days [1]</b> 6/12</p> <p><b>11,500 [1]</b> 126/20</p> <p><b>11.13 am [1]</b> 23/18</p> <p><b>11.37 [2]</b> 20/10 21/25</p> <p><b>1120 [1]</b> 90/11</p> <p><b>119 [1]</b> 181/13</p> <p><b>12 [5]</b> 116/15 116/16<br/>138/13 175/23 185/23</p> <p><b>12 July [1]</b> 120/9</p> <p><b>12 May [1]</b> 126/7</p> <p><b>12.00 [1]</b> 84/11</p> <p><b>12.10 [2]</b> 84/9 84/13</p> <p><b>12.41 [1]</b> 106/14</p> <p><b>120 [1]</b> 181/13</p> <p><b>13 [4]</b> 61/8 61/8<br/>138/18 175/23</p> <p><b>136 [1]</b> 152/20</p> <p><b>14 [2]</b> 37/24 175/24</p> <p><b>14 January [2]</b><br/>174/23 174/23</p> <p><b>15 [7]</b> 36/22 85/10<br/>118/9 118/20 128/19<br/>132/21 148/6</p> <p><b>15 July [1]</b> 145/11</p> <p><b>15 minutes [1]</b> 89/7</p> <p><b>15 pages [1]</b> 37/23</p> <p><b>15-minute [1]</b> 36/24</p> <p><b>150 [1]</b> 152/21</p> <p><b>157 [1]</b> 107/18</p> <p><b>16 [1]</b> 153/4</p> <p><b>16 July [1]</b> 117/11</p> <p><b>16 June [1]</b> 160/2</p> <p><b>16 May [1]</b> 107/5</p> <p><b>16 September [2]</b><br/>172/12 173/24</p> <p><b>16' [1]</b> 78/3</p> <p><b>160 [2]</b> 4/25 5/5</p> <p><b>161 [1]</b> 6/5</p> <p><b>16th [2]</b> 117/12<br/>117/12</p> <p><b>17 [1]</b> 166/22</p> <p><b>17 October [1]</b><br/>173/21</p> <p><b>17 September [2]</b><br/>167/17 167/19</p> <p><b>18 [2]</b> 71/11 141/25</p> <p><b>18 July [1]</b> 120/10</p> <p><b>18 June 2015 [1]</b></p> | <p>85/2</p> <p><b>18 October [1]</b><br/>173/22</p> <p><b>18 years [1]</b> 30/13</p> <p><b>19 August [1]</b> 138/23</p> <p><b>1978 [1]</b> 51/3</p> <p><b>1979 [1]</b> 109/18</p> <p><b>1997 [1]</b> 39/5</p> <p><b>1999 [5]</b> 40/11 61/5<br/>61/12 62/13 63/17</p> <hr/> <p><b>2</b></p> <p><b>2.47 [1]</b> 146/5</p> <p><b>2.5 million [1]</b> 78/21</p> <p><b>20 [1]</b> 146/12</p> <p><b>20 June 2024 [1]</b> 1/1</p> <p><b>20 years [1]</b> 108/25</p> <p><b>2000 [2]</b> 40/11 95/16</p> <p><b>2000s [2]</b> 95/14<br/>95/18</p> <p><b>2001 [5]</b> 61/2 61/2<br/>61/7 61/11 62/14</p> <p><b>2002 [24]</b> 3/20 39/5<br/>39/17 40/6 45/10<br/>48/19 49/2 49/6 49/13<br/>58/11 58/13 58/18<br/>58/19 58/23 61/2 61/7<br/>76/16 83/3 94/8 94/11<br/>97/3 97/4 98/10<br/>101/17</p> <p><b>2002/2003 [1]</b> 61/11</p> <p><b>2003 [3]</b> 61/2 61/8<br/>61/11</p> <p><b>2003/2004 [2]</b> 96/19<br/>97/4</p> <p><b>2004 [4]</b> 61/3 61/8<br/>96/19 97/4</p> <p><b>2005 [2]</b> 111/12<br/>123/14</p> <p><b>2006 [8]</b> 3/16 3/19<br/>5/6 19/16 20/10 23/6<br/>31/22 61/9</p> <p><b>2008 [1]</b> 138/23</p> <p><b>2009 [5]</b> 82/2 83/9<br/>111/7 111/18 111/20</p> <p><b>2010 [1]</b> 110/16</p> <p><b>2010/11 [1]</b> 175/22</p> <p><b>2011 [6]</b> 67/14 67/19<br/>68/2 100/22 101/7<br/>123/12</p> <p><b>2011/12 [1]</b> 175/23</p> <p><b>2012 [20]</b> 110/21<br/>111/21 112/1 112/3<br/>112/7 113/19 114/2<br/>114/17 115/13 116/16<br/>117/9 117/11 119/12<br/>121/11 121/22 122/14<br/>155/3 155/5 155/9<br/>177/7</p> <p><b>2012/13 [1]</b> 175/23</p> <p><b>2013 [17]</b> 51/5<br/>114/16 118/23 119/7<br/>119/12 124/17 125/3<br/>125/24 126/7 128/21</p> | <p>129/1 129/6 134/3<br/>134/18 141/7 141/22<br/>145/11</p> <p><b>2013/14 [1]</b> 175/24</p> <p><b>2014 [13]</b> 51/5 74/9<br/>148/8 148/18 151/10<br/>151/24 151/25 151/25<br/>153/22 160/2 166/23<br/>172/12 174/14</p> <p><b>2014/2015 [1]</b> 67/11</p> <p><b>2015 [7]</b> 67/11 71/11<br/>85/2 174/24 175/20<br/>177/22 177/23</p> <p><b>2015/16' [1]</b> 78/3</p> <p><b>2019 [2]</b> 82/2 83/9</p> <p><b>2021 [1]</b> 145/14</p> <p><b>2022 [1]</b> 38/20</p> <p><b>2024 [6]</b> 1/1 3/6 3/12<br/>4/20 107/5 187/10</p> <p><b>207,000 [1]</b> 175/23</p> <p><b>21 [1]</b> 85/13</p> <p><b>21 May [1]</b> 129/6</p> <p><b>22 [1]</b> 121/25</p> <p><b>23 January [1]</b><br/>153/21</p> <p><b>234,000 [1]</b> 175/24</p> <p><b>23rd January [1]</b><br/>153/22</p> <p><b>24 [2]</b> 107/9 166/12</p> <p><b>24 March [4]</b> 19/15<br/>20/10 21/25 23/6</p> <p><b>24th [1]</b> 13/13</p> <p><b>25 January [1]</b><br/>124/17</p> <p><b>25 June [1]</b> 71/12</p> <p><b>26 June [1]</b> 163/4</p> <p><b>269/15 [1]</b> 85/10</p> <p><b>27 [1]</b> 155/11</p> <p><b>28 [3]</b> 153/5 154/16<br/>171/22</p> <p><b>29 November [1]</b><br/>38/19</p> <hr/> <p><b>3</b></p> <p><b>3 October [1]</b> 67/19</p> <p><b>3 years [1]</b> 174/6</p> <p><b>3.00 [2]</b> 146/2 146/7</p> <p><b>30 January [2]</b> 148/8<br/>148/18</p> <p><b>30 years [1]</b> 57/18</p> <p><b>30/11/05 [1]</b> 5/24</p> <p><b>31 [1]</b> 181/4</p> <p><b>33 [5]</b> 46/16 46/19<br/>50/17 53/12 57/3</p> <hr/> <p><b>4</b></p> <p><b>4.06 [1]</b> 187/24</p> <p><b>4.10.1 [1]</b> 152/4</p> <p><b>4.9 [1]</b> 152/3</p> <p><b>40 [1]</b> 4/23</p> <p><b>401 [3]</b> 5/18 6/17<br/>24/16</p> <p><b>41 [1]</b> 107/16</p> <p><b>43 [1]</b> 81/25</p> |
|--|---|---|--|---|



|          |   |  |  |  |
|----------|---|--|--|--|
| <b>4</b> | 5/11 6/13 6/23 7/5<br>9/15 10/17 12/12 13/3<br>14/3 17/19 18/24<br>19/10 25/3 40/9 46/1<br>47/6 49/14 49/17 58/9<br>58/16 61/18 62/22<br>64/6 65/4 68/15 69/17<br>71/2 72/24 73/4 73/24<br>73/25 77/19 85/13<br>87/7 96/2 96/6 96/14<br>96/21 96/25 97/8<br>97/13 98/15 98/17<br>98/21 98/23 99/3 99/7<br>100/2 100/17 100/21<br>100/25 101/22 102/2<br>103/5 103/7 103/8<br>104/21 104/21 108/1<br>110/16 110/21 112/14<br>112/25 114/6 114/14<br>115/17 117/14 120/10<br>120/25 122/21 124/2<br>124/7 125/2 125/9<br>125/11 128/17 129/3<br>133/21 133/24 134/1<br>134/2 134/12 134/23<br>136/6 137/5 138/4<br>138/24 139/8 139/9<br>139/11 139/21 140/10<br>140/12 143/11 143/12<br>143/23 144/3 144/18<br>146/22 147/4 148/21<br>149/2 152/13 156/14<br>157/8 158/10 163/17<br>163/21 169/11 170/3<br>170/16 171/12 174/21<br>175/19 175/20 177/7<br>177/16 180/11 180/19<br>183/4 183/8 183/16<br>184/12 184/24 185/12<br>185/25 186/4 | 172/17 172/18 172/20<br>174/2 174/4 174/10<br>174/19 175/22 185/22<br><b>accountable [1]</b><br>46/14<br><b>accountancy [2]</b><br>109/8 121/9<br><b>accountant [9]</b><br>109/18 109/20 109/23<br>110/6 110/15 116/25<br>117/15 131/22 182/24<br><b>accountants [4]</b><br>110/3 110/13 114/25<br>115/10<br><b>accounting [10]</b><br>46/21 47/2 48/11<br>49/10 51/11 55/6<br>110/7 161/17 161/19<br>172/21<br><b>accounts [14]</b> 41/8<br>111/14 130/6 133/10<br>138/25 151/11 151/21<br>172/24 173/3 173/9<br>175/7 175/16 176/8<br>176/24<br><b>accredited [3]</b> 74/12<br>74/14 77/17<br><b>accuracy [3]</b> 5/11<br>13/2 167/24<br><b>accurate [4]</b> 54/2<br>105/9 114/20 158/5<br><b>accurately [2]</b> 41/8<br>149/24<br><b>accuse [1]</b> 104/24<br><b>accused [7]</b> 46/21<br>48/11 49/10 57/19<br>57/21 58/2 103/14<br><b>accusing [1]</b> 105/12<br><b>acknowledge [1]</b><br>60/19<br><b>acknowledgement</b><br><b>[1]</b> 86/17<br><b>acknowledges [1]</b><br>79/16<br><b>across [7]</b> 15/13 32/3<br>56/25 57/1 91/6<br>137/14 180/3<br><b>act [1]</b> 109/22<br><b>acted [2]</b> 3/24 146/15<br><b>acting [4]</b> 30/4<br>116/19 116/24 117/14<br><b>action [9]</b> 51/22<br>80/17 86/24 93/5 93/9<br>123/8 123/15 148/22<br>154/1<br><b>actions [3]</b> 94/19<br>123/13 154/16<br><b>actively [4]</b> 54/6<br>67/13 68/12 79/12<br><b>activities [3]</b> 79/12<br>79/17 79/19<br><b>activity [2]</b> 52/12<br>85/17<br><b>actual [4]</b> 29/22 57/4 | 78/4 97/13<br><b>actually [25]</b> 14/14<br>19/11 22/4 23/16<br>36/22 38/3 73/25 78/7<br>95/11 104/13 115/6<br>118/15 131/8 132/10<br>134/16 135/8 143/1<br>144/4 156/1 161/19<br>167/15 169/6 173/4<br>180/4 184/7<br><b>add [6]</b> 6/1 7/15 8/9<br>31/20 92/4 183/1<br><b>added [6]</b> 16/11<br>25/13 27/22 29/16<br>92/8 136/11<br><b>addition [1]</b> 152/4<br><b>additional [3]</b> 78/18<br>163/21 174/25<br><b>address [5]</b> 6/7 7/21<br>46/15 76/14 126/9<br><b>addressed [3]</b> 74/5<br>118/11 175/10<br><b>addressee [1]</b> 118/14<br><b>addressing [1]</b><br>152/12<br><b>adds [1]</b> 127/11<br><b>adequate [1]</b> 32/8<br><b>adjourned [1]</b> 187/25<br><b>Adjournment [1]</b><br>106/15<br><b>admin [1]</b> 82/21<br><b>administration [3]</b><br>39/14 121/17 148/2<br><b>administrative [1]</b><br>94/5<br><b>administrator [1]</b><br>146/15<br><b>admit [2]</b> 57/6 133/1<br><b>admitted [3]</b> 57/22<br>58/4 65/14<br><b>adopted [1]</b> 85/14<br><b>adoption [1]</b> 78/10<br><b>advantages [1]</b> 92/16<br><b>advertised [1]</b> 166/3<br><b>advice [6]</b> 2/17 74/10<br>109/9 109/9 145/10<br>145/13<br><b>advise [1]</b> 122/4<br><b>affect [5]</b> 11/13 75/16<br>126/20 137/14 155/6<br><b>affected [5]</b> 87/10<br>147/19 147/21 153/11<br>169/22<br><b>affecting [5]</b> 43/10<br>44/16 97/2 97/12<br>101/2<br><b>affiliation [1]</b> 113/3<br><b>afford [1]</b> 147/6<br><b>afoot [1]</b> 28/22<br><b>afraid [1]</b> 124/14<br><b>after [34]</b> 2/11 27/9<br>41/20 47/8 48/12<br>48/20 48/22 49/6<br>49/13 58/6 58/11 | 58/13 58/19 60/16<br>60/25 101/17 101/20<br>114/16 117/9 119/9<br>135/24 139/24 145/14<br>146/21 152/5 160/21<br>170/12 174/6 178/15<br>179/2 179/7 179/13<br>179/19 182/8<br><b>afternoon [5]</b> 84/14<br>95/5 106/17 145/24<br>187/12<br><b>afterwards [1]</b> 58/18<br><b>again [18]</b> 15/6 23/20<br>28/16 33/20 34/11<br>57/9 61/3 85/1 101/16<br>128/20 130/16 142/18<br>143/24 151/12 152/22<br>161/16 164/1 181/5<br><b>against [19]</b> 2/4 2/7<br>28/9 28/19 28/23 60/7<br>60/14 60/25 64/24<br>86/24 93/11 93/12<br>109/1 147/15 161/14<br>162/8 163/12 179/9<br>179/12<br><b>agenda [2]</b> 153/20<br>174/25<br><b>agents [3]</b> 66/22<br>67/21 68/4<br><b>aggressive [5]</b> 103/5<br>103/15 104/1 181/16<br>181/21<br><b>ago [6]</b> 7/4 32/13<br>57/19 68/16 93/3<br>134/3<br><b>agree [28]</b> 9/18 19/19<br>19/24 20/3 26/10<br>26/14 26/21 27/5<br>27/14 27/16 27/19<br>27/23 28/5 28/8 32/22<br>33/4 79/19 82/22 88/4<br>88/5 102/4 102/7<br>102/13 116/20 120/20<br>125/2 125/6 127/15<br><b>agreed [28]</b> 19/15<br>28/1 29/5 29/8 33/3<br>33/17 34/14 102/10<br>116/17 117/2 144/10<br>144/12 152/3 152/4<br>152/7 152/10 155/19<br>161/24 162/5 163/22<br>164/5 164/16 164/18<br>164/25 165/24 166/2<br>171/13 174/7<br><b>agreement [13]</b> 50/8<br>72/6 73/11 75/19<br>79/10 80/2 80/15<br>80/20 81/15 90/16<br>90/23 91/12 164/17<br><b>agreements [3]</b><br>43/24 50/18 66/6<br><b>ahead [2]</b> 89/17<br>185/18<br><b>aid [1]</b> 80/5 |
| <b>5</b> | 5 June [1] 129/12<br><b>500 [3]</b> 58/2 59/7<br>59/12<br><b>52 [2]</b> 23/19 31/16<br><b>55 [1]</b> 148/7  |  |  |  |
| <b>6</b> | <b>6 February [1]</b> 154/9<br><b>6 July [1]</b> 117/9<br><b>6's [1]</b> 80/12<br><b>612,000 [2]</b> 175/23<br>185/24<br><b>66 [1]</b> 141/25<br><b>6c [1]</b> 79/11<br><b>6th [1]</b> 117/12   |  |  |  |
| <b>7</b> | <b>7 March [2]</b> 151/24<br>151/25<br><b>76 [1]</b> 146/13<br><b>77 [1]</b> 146/18   |  |  |  |
| <b>8</b> | <b>8 July [2]</b> 119/7<br>134/17<br><b>85 [1]</b> 180/22<br><b>8b [1]</b> 69/8   |  |  |  |
| <b>9</b> | <b>9 May [2]</b> 37/18 38/8<br><b>9,000/9,500 [1]</b> 95/17<br><b>9,500 [1]</b> 95/17<br><b>9.45 [3]</b> 1/2 187/22<br>187/25<br><b>90 per cent [1]</b><br>180/22<br><b>91 [5]</b> 107/10 107/15<br>166/12 166/13 166/14  |  |  |  |
| <b>A</b> | <b>AB [4]</b> 163/19 164/1<br>164/2 164/22<br><b>abandonment [1]</b><br>81/7<br><b>ability [4]</b> 47/10 75/7<br>91/16 138/24<br><b>able [19]</b> 7/6 9/4 11/2<br>43/5 44/15 77/6 81/10<br>92/24 93/13 93/14<br>97/1 116/19 147/6<br>159/19 160/21 175/6<br>178/21 179/1 180/8<br><b>about [133]</b> 1/14 3/7<br>3/12 4/10 4/13 5/9   |  |  |  |

|   |   |  |   |   |
|---|---|--|---|---|
| <b>A</b>  | <b>already [6]</b> 5/18<br>90/17 120/25 123/24<br>144/22 145/9  | <b>announced [1]</b> 182/5   | <b>anybody [3]</b> 66/3<br>75/11 147/5  | 70/20 71/5 72/18<br>85/13 88/18 115/18<br>120/15 120/16 141/8<br>142/9 142/20 142/22<br>150/5 162/2   |
| <b>aimed [1]</b> 156/23   | <b>also [27]</b> 5/16 5/20<br>32/19 55/5 56/3 59/2<br>70/22 70/24 72/20<br>76/5 85/7 90/15 93/19<br>96/12 97/2 98/22<br>102/13 103/4 110/11<br>125/5 130/24 131/13<br>137/12 142/3 143/17<br>178/5 178/14 | <b>annual [2]</b> 78/20<br>133/10  | <b>anybody's [1]</b> 18/12  | <b>approached [7]</b><br>68/22 70/17 70/23<br>71/5 71/6 72/11 86/6  |
| <b>airport [5]</b> 166/22<br>167/10 167/19 168/3<br>171/18  | <b>alter [1]</b> 14/23  | <b>annum [3]</b> 78/3 78/19<br>78/21   | <b>anyone [4]</b> 2/1 2/18<br>158/22 171/3  | <b>appropriate [2]</b> 1/19<br>2/23   |
| <b>Alan [38]</b> 86/3 96/18<br>111/20 111/25 112/10<br>112/12 112/17 113/9<br>113/19 114/3 116/16<br>118/19 121/13 124/23<br>125/5 126/7 126/25<br>127/21 129/6 129/15<br>129/24 129/25 131/20<br>132/9 132/16 133/23<br>139/8 139/11 140/12<br>141/1 148/23 150/3<br>158/3 163/19 178/2<br>183/16 183/22 184/18  | <b>although [2]</b> 68/15<br>140/14   | <b>anomalies [2]</b> 120/5<br>120/17   | <b>anything [37]</b> 12/12<br>14/5 14/6 14/24 17/5<br>17/14 17/15 18/12<br>26/5 26/17 28/3 31/5<br>31/20 32/23 34/2<br>34/19 46/9 88/11<br>90/18 90/24 96/2<br>98/17 98/21 113/15<br>138/5 138/24 147/4<br>149/20 150/24 151/15<br>151/18 161/4 170/4<br>175/18 177/18 180/12<br>184/24 | <b>appropriateness [1]</b><br>147/1   |
| <b>Alerted [1]</b> 101/1  | <b>always [10]</b> 46/20<br>49/9 57/22 104/1<br>109/3 131/10 131/11<br>133/23 151/3 154/13  | <b>answered [4]</b> 124/11<br>145/9 174/21 176/11  | <b>anyway [1]</b> 177/1   | <b>approval [1]</b> 185/4   |
| <b>aligned [3]</b> 66/10<br>67/5 69/18  | <b>Alwen [6]</b> 118/22<br>118/25 119/2 128/18<br>133/21 134/11   | <b>answering [3]</b> 1/14<br>2/13 106/7  | <b>anywhere [1]</b> 132/2   | <b>April [1]</b> 85/13  |
| <b>all [66]</b> 1/20 2/23<br>2/25 5/20 12/14 17/6<br>17/15 18/11 18/22<br>19/6 23/21 24/5 24/5<br>26/19 28/14 30/7<br>30/22 31/23 32/12<br>32/14 32/23 34/4<br>34/20 35/17 36/15<br>36/18 36/24 43/24<br>77/14 80/18 90/6<br>93/25 94/4 97/24 98/6<br>100/7 105/5 105/21<br>106/13 112/14 118/6<br>125/22 133/15 134/6<br>134/9 137/11 146/3<br>153/13 161/9 163/8<br>168/15 172/6 175/16<br>176/23 178/3 179/3<br>179/23 179/24 180/20<br>181/14 184/16 185/13<br>186/5 187/5 187/15<br>187/20 | <b>am [17]</b> 1/2 15/18<br>17/16 23/18 27/5 32/3<br>37/3 37/5 72/9 92/20<br>94/16 124/1 129/21<br>131/23 133/17 176/14<br>187/25   | <b>answers [2]</b> 1/15<br>48/3  | <b>AOB [2]</b> 153/25<br>154/17   | <b>Arbuthnot [13]</b><br>112/19 114/4 114/12<br>116/13 117/10 121/14<br>124/18 124/19 127/2<br>135/6 140/12 141/2<br>170/8  |
| <b>allegation [1]</b> 138/14  | <b>amalgamated [1]</b><br>184/22  | <b>Anthony [16]</b> 37/8<br>37/11 37/16 151/5<br>151/14 153/10 153/13<br>159/2 159/5 159/6<br>159/9 159/21 163/11<br>165/17 172/2 188/6  | <b>apart [2]</b> 74/2 84/23   | <b>Arbuthnot's [1]</b><br>112/17  |
| <b>allegations [2]</b><br>145/11 145/16   | <b>amend [1]</b> 29/20  | <b>any [111]</b> 1/25 2/6<br>2/8 2/8 2/11 15/16<br>23/10 23/24 34/17<br>34/18 36/13 39/24<br>48/14 48/21 49/1 49/5<br>49/14 49/14 49/16<br>49/17 50/9 53/6 53/13<br>53/21 54/8 54/18<br>54/22 56/17 57/1 58/6<br>58/12 60/4 60/11 63/7<br>63/7 71/4 75/12 76/14<br>77/14 81/7 82/2 82/3<br>82/17 83/9 83/10<br>88/24 89/3 89/13<br>89/14 94/24 94/24<br>97/19 99/13 100/24<br>103/24 104/2 105/24<br>109/3 109/9 109/15<br>113/25 115/1 116/9<br>118/3 120/8 120/10<br>122/4 122/23 123/18<br>123/22 124/10 125/8<br>127/18 127/19 128/8<br>130/21 133/15 133/18<br>134/10 134/18 134/22<br>135/21 135/22 138/10<br>140/8 142/9 144/25<br>145/2 146/25 147/18<br>148/12 150/19 152/5<br>152/11 152/23 153/12<br>157/5 157/7 157/9<br>157/23 158/25 165/25<br>169/5 170/25 172/5<br>173/17 176/7 180/15<br>183/19 184/15 186/24 | <b>Apologies [3]</b> 48/6<br>49/7 166/15  | <b>are [119]</b> 2/8 5/11 6/2<br>6/14 7/16 8/1 8/19<br>9/10 9/13 9/24 12/7<br>16/8 16/10 16/12<br>16/12 17/11 20/24<br>21/1 22/20 23/10 24/8<br>25/5 25/7 25/13 25/14<br>25/24 26/13 27/11<br>29/14 34/7 34/9 34/23<br>35/4 35/20 36/11<br>38/24 47/2 47/15<br>47/20 48/14 49/21<br>55/9 56/8 57/5 57/6<br>57/9 58/22 60/20<br>60/20 61/6 67/4 69/12<br>69/21 71/4 72/8 73/18<br>73/20 75/4 75/16 77/6<br>78/25 79/8 79/12<br>79/14 80/8 80/9 82/24<br>83/4 83/5 83/22 86/15<br>86/25 89/7 92/16<br>93/20 94/12 98/3<br>102/5 102/8 103/20<br>103/21 104/7 104/13<br>105/21 105/22 106/19<br>107/21 107/23 108/8<br>109/15 118/15 118/20<br>122/4 123/19 124/24<br>127/1 127/14 129/16<br>136/25 138/20 138/21<br>143/16 151/7 151/25<br>152/24 157/24 158/9<br>166/5 168/18 169/23<br>171/24 172/16 174/2<br>179/23 180/4 181/1<br>185/1 185/5 185/6 |
| <b>alleged [3]</b> 58/6<br>85/14 85/21  | <b>amending [1]</b> 31/16   | <b>answered [4]</b> 124/11<br>145/9 174/21 176/11  | <b>apologise [2]</b> 117/12<br>187/15   | <b>aren't [2]</b> 10/18   |
| <b>alliance [2]</b> 118/15<br>123/1   | <b>amendment [8]</b><br>22/25 23/1 23/5 23/13<br>23/15 23/17 23/21<br>23/25   | <b>answering [3]</b> 1/14<br>2/13 106/7  | <b>apparent [1]</b> 161/22  |   |
| <b>Alliance' [1]</b> 85/25  | <b>amendments [3]</b><br>22/18 24/5 24/8  | <b>answers [2]</b> 1/15<br>48/3  | <b>appeal [8]</b> 59/15<br>59/15 60/4 143/23<br>144/2 145/7 145/14<br>159/3   |   |
| <b>allow [1]</b> 99/14  | <b>ammunition [1]</b><br>181/9  | <b>Anthony [16]</b> 37/8<br>37/11 37/16 151/5<br>151/14 153/10 153/13<br>159/2 159/5 159/6<br>159/9 159/21 163/11<br>165/17 172/2 188/6  | <b>appear [5]</b> 17/7 23/10<br>61/2 75/2 109/12  |   |
| <b>allowed [5]</b> 51/21<br>55/15 59/10 59/20<br>152/6  | <b>among [1]</b> 187/1  | <b>any [111]</b> 1/25 2/6<br>2/8 2/8 2/11 15/16<br>23/10 23/24 34/17<br>34/18 36/13 39/24<br>48/14 48/21 49/1 49/5<br>49/14 49/14 49/16<br>49/17 50/9 53/6 53/13<br>53/21 54/8 54/18<br>54/22 56/17 57/1 58/6<br>58/12 60/4 60/11 63/7<br>63/7 71/4 75/12 76/14<br>77/14 81/7 82/2 82/3<br>82/17 83/9 83/10<br>88/24 89/3 89/13<br>89/14 94/24 94/24<br>97/19 99/13 100/24<br>103/24 104/2 105/24<br>109/3 109/9 109/15<br>113/25 115/1 116/9<br>118/3 120/8 120/10<br>122/4 122/23 123/18<br>123/22 124/10 125/8<br>127/18 127/19 128/8<br>130/21 133/15 133/18<br>134/10 134/18 134/22<br>135/21 135/22 138/10<br>140/8 142/9 144/25<br>145/2 146/25 147/18<br>148/12 150/19 152/5<br>152/11 152/23 153/12<br>157/5 157/7 157/9<br>157/23 158/25 165/25<br>169/5 170/25 172/5<br>173/17 176/7 180/15<br>183/19 184/15 186/24 | <b>appeared [7]</b> 38/19<br>102/10 131/25 132/13<br>132/15 150/18 150/22   |   |
| <b>allowing [3]</b> 68/11<br>90/23 169/25   | <b>amongst [3]</b> 57/4<br>186/24 187/8   | <b>answering [3]</b> 1/14<br>2/13 106/7  | <b>appearing [2]</b> 26/12<br>150/23  |   |
| <b>almost [7]</b> 46/8 78/25<br>86/23 103/16 108/25<br>112/2 124/25   | <b>amount [3]</b> 52/24<br>78/4 120/19  | <b>answers [2]</b> 1/15<br>48/3  | <b>appears [6]</b> 68/1<br>72/18 73/10 86/17<br>163/11 168/1  |   |
| <b>along [1]</b> 72/10  | <b>amounts [4]</b> 52/24<br>133/8 174/18 175/21   | <b>Anthony [16]</b> 37/8<br>37/11 37/16 151/5<br>151/14 153/10 153/13<br>159/2 159/5 159/6<br>159/9 159/21 163/11<br>165/17 172/2 188/6  | <b>applicant [6]</b> 156/23<br>156/24 160/20 160/21<br>163/9 163/22   |   |
| <b>alongside [2]</b> 55/12<br>103/18  | <b>analysis [5]</b> 5/23<br>6/17 135/12 135/13<br>135/14  | <b>answered [4]</b> 124/11<br>145/9 174/21 176/11  | <b>applicants [1]</b> 164/12  |   |
|   | <b>Andy [21]</b> 40/7 45/11<br>45/17 46/8 56/21<br>70/20 76/16 83/1<br>83/13 87/23 97/5<br>98/10 98/13 101/6<br>101/20 142/5 142/6<br>142/13 143/8 143/10<br>143/25                                       | <b>answering [3]</b> 1/14<br>2/13 106/7  | <b>applicants' [1]</b> 169/5  |   |
|   | <b>Angela [10]</b> 142/4<br>142/15 147/8 168/17<br>168/23 168/24 168/25<br>169/1 170/19 178/5   | <b>answers [2]</b> 1/15<br>48/3  | <b>application [7]</b> 166/4<br>182/1 182/4 182/5<br>182/10 183/4 183/8   |   |
|   | <b>anger [1]</b> 183/11   | <b>answered [4]</b> 124/11<br>145/9 174/21 176/11  | <b>applications [1]</b><br>181/24   |   |
|   | <b>annotated [1]</b> 9/4  | <b>answering [3]</b> 1/14<br>2/13 106/7  | <b>applied [3]</b> 51/10<br>51/15 110/4   |   |
|   |   | <b>answers [2]</b> 1/15<br>48/3  | <b>applies [1]</b> 58/17  |   |
|   |   | <b>Anthony [16]</b> 37/8<br>37/11 37/16 151/5<br>151/14 153/10 153/13<br>159/2 159/5 159/6<br>159/9 159/21 163/11<br>165/17 172/2 188/6  | <b>apply [2]</b> 51/25 58/11  |   |
|   |   | <b>any [111]</b> 1/25 2/6<br>2/8 2/8 2/11 15/16<br>23/10 23/24 34/17<br>34/18 36/13 39/24<br>48/14 48/21 49/1 49/5<br>49/14 49/14 49/16<br>49/17 50/9 53/6 53/13<br>53/21 54/8 54/18<br>54/22 56/17 57/1 58/6<br>58/12 60/4 60/11 63/7<br>63/7 71/4 75/12 76/14<br>77/14 81/7 82/2 82/3<br>82/17 83/9 83/10<br>88/24 89/3 89/13<br>89/14 94/24 94/24<br>97/19 99/13 100/24<br>103/24 104/2 105/24<br>109/3 109/9 109/15<br>113/25 115/1 116/9<br>118/3 120/8 120/10<br>122/4 122/23 123/18<br>123/22 124/10 125/8<br>127/18 127/19 128/8<br>130/21 133/15 133/18<br>134/10 134/18 134/22<br>135/21 135/22 138/10<br>140/8 142/9 144/25<br>145/2 146/25 147/18<br>148/12 150/19 152/5<br>152/11 152/23 153/12<br>157/5 157/7 157/9<br>157/23 158/25 165/25<br>169/5 170/25 172/5<br>173/17 176/7 180/15<br>183/19 184/15 186/24 | <b>appointed [1]</b> 146/14   |   |
|   |   | <b>anybody [3]</b> 66/3<br>75/11 147/5   | <b>appointing [1]</b> 159/9   |   |
|   |   | <b>anybody's [1]</b> 18/12   | <b>appointment [3]</b> 40/1<br>116/17 147/1   |   |
|   |   | <b>anyone [4]</b> 2/1 2/18<br>158/22 171/3   | <b>appreciate [2]</b><br>143/21 167/24  |   |
|   |   | <b>anything [37]</b> 12/12<br>14/5 14/6 14/24 17/5<br>17/14 17/15 18/12<br>26/5 26/17 28/3 31/5<br>31/20 32/23 34/2<br>34/19 46/9 88/11<br>90/18 90/24 96/2<br>98/17 98/21 113/15<br>138/5 138/24 147/4<br>149/20 150/24 151/15<br>151/18 161/4 170/4<br>175/18 177/18 180/12<br>184/24  | <b>approach [15]</b> 68/23  |   |
|   |   | <b>answered [4]</b> 124/11<br>145/9 174/21 176/11  |   |   |
|   |   | <b>answering [3]</b> 1/14<br>2/13 106/7  |   |   |
|   |   | <b>answers [2]</b> 1/15<br>48/3  |   |   |
|   |   | <b>Anthony [16]</b> 37/8<br>37/11 37/16 151/5<br>151/14 153/10 153/13<br>159/2 159/5 159/6<br>159/9 159/21 163/11<br>165/17 172/2 188/6  |   |   |
|   |   | <b>any [111]</b> 1/25 2/6<br>2/8 2/8 2/11 15/16<br>23/10 23/24 34/17<br>34/18 36/13 39/24<br>48/14 48/21 49/1 49/5<br>49/14 49/14 49/16<br>49/17 50/9 53/6 53/13<br>53/21 54/8 54/18<br>54/22 56/17 57/1 58/6<br>58/12 60/4 60/11 63/7<br>63/7 71/4 75/12 76/14<br>77/14 81/7 82/2 82/3<br>82/17 83/9 83/10<br>88/24 89/3 89/13<br>89/14 94/24 94/24<br>97/19 99/13 100/24<br>103/24 104/2 105/24<br>109/3 109/9 109/15<br>113/25 115/1 116/9<br>118/3 120/8 120/10<br>122/4 122/23 123/18<br>123/22 124/10 125/8<br>127/18 127/19 128/8<br>130/21 133/15 133/18<br>134/10 134/18 134/22<br>135/21 135/22 138/10<br>140/8 142/9 144/25<br>145/2 146/25 147/18<br>148/12 150/19 152/5<br>152/11 152/23 153/12<br>157/5 157/7 157/9<br>157/23 158/25 165/25<br>169/5 170/25 172/5<br>173/17 176/7 180/15<br>183/19 184/15 186/24 |   |   |
|   |   | <b>anybody [3]</b> 66/3<br>75/11 147/5   |   |   |
|   |   | <b>anybody's [1]</b> 18/12   |   |   |
|   |   | <b>anyone [4]</b> 2/1 2/18<br>158/22 171/3   |   |   |
|   |   | <b>anything [37]</b> 12/12<br>14/5 14/6 14/24 17/5<br>17/14 17/15 18/12<br>26/5 26/17 28/3 31/5<br>31/20 32/23 34/2<br>34/19 46/9 88/11<br>90/18 90/24 96/2<br>98/17 98/21 113/15<br>138/5 138/24 147/4<br>149/20 150/24 151/15<br>151/18 161/4 170/4<br>175/18 177/18 180/12<br>184/24  |   |   |
|   |   | <b>answered [4]</b> 124/11<br>145/9 174/21 176/11  |   |   |
|   |   | <b>answering [3]</b> 1/14<br>2/13 106/7  |   |   |
|   |   | <b>answers [2]</b> 1/15<br>48/3  |   |   |
|   |   | <b>Anthony [16]</b> 37/8<br>37/11 37/16 151/5<br>151/14 153/10 153/13<br>159/2 159/5 159/6<br>159/9 159/21 163/11<br>165/17 172/2 188/6  |   |   |
|   |   | <b>any [111]</b> 1/25 2/6<br>2/8 2/8 2/11 15/16<br>23/10 23/24 34/17<br>34/18 36/13 39/24<br>48/14 48/21 49/1 49/5<br>49/14 49/14 49/16<br>49/17 50/9 53/6 53/13<br>53/21 54/8 54/18<br>54/22 56/17 57/1 58/6<br>58/12 60/4 60/11 63/7<br>63/7 71/4 75/12 76/14<br>77/14 81/7 82/2 82/3<br>82/17 83/9 83/10<br>88/24 89/3 89/13<br>89/14 94/24 94/24<br>97/19 99/13 100/24<br>103/24 104/2 105/24<br>109/3 109/9 109/15<br>113/25 115/1 116/9<br>118/3 120/8 120/10<br>122/4 122/23 123/18<br>123/22 124/10 125/8<br>127/18 127/19 128/8<br>130/21 133/15 133/18<br>134/10 134/18 134/22<br>135/21 135/22 138/10<br>140/8 142/9 144/25<br>145/2 146/25 147/18<br>148/12 150/19 152/5<br>152/11 152/23 153/12<br>157/5 157/7 157/9<br>157/23 158/25 165/25<br>169/5 170/25 172/5<br>173/17 176/7 180/15<br>183/19 184/15 186/24 |   |   |
|   |   | <b>anybody [3]</b> 66/3<br>75/11 147/5   |   |   |
|   |   | <b>anybody's [1]</b> 18/12   |   |   |
|   |   | <b>anyone [4]</b> 2/1 2/18<br>158/22 171/3   |   |   |
|   |   | <b>anything [37]</b> 12/12<br>14/5 14/6 14/24 17/5<br>17/14 17/15 18/12<br>26/5 26/17 28/3 31/5<br>31/20 32/23 34/2<br>34/19 46/9 88/11<br>90/18 90/24 96/2<br>98/17 98/21 113/15<br>138/5 138/24 147/4<br>149/20 150/24 151/15<br>151/18 161/4 170/4<br>175/18 177/18 180/12<br>184/24  |   |   |
|   |   | <b>answered [4]</b> 124/11<br>145/9 174/21 176/11  |   |   |
|   |   | <b>answering [3]</b> 1/14<br>2/13 106/7  |   |   |
|   |   | <b>answers [2]</b> 1/15<br>48/3  |   |   |
|   |   | <b>Anthony [16]</b> 37/8<br>37/11 37/16 151/5<br>151/14 153/10 153/13<br>159/2 159/5 159/6<br>159/9 159/21 163/11<br>165/17 172/2 188/6  |   |   |
|   |   | <b>any [111]</b> 1/25 2/6<br>2/8 2/8 2/11 15/16<br>23/10 23/24 34/17<br>34/18 36/13 39/24<br>48/14 48/21 49/1 49/5<br>49/14 49/14 49/16<br>49/17 50/9 53/6 53/13<br>53/21 54/8 54/18<br>54/22 56/17 57/1 58/6<br>58/12 60/4 60/11 63/7<br>63/7 71/4 75/12 76/14<br>77/14 81/7 82/2 82/3<br>  |   |   |

|          |   |  |  |   |
|----------|---|--|--|---|
| <b>A</b> | <b>aspect [1]</b> 182/3<br><b>aspects [3]</b> 38/18<br>98/4 111/15<br><b>assertion [6]</b> 46/23<br>49/4 49/7 49/8 49/12<br>49/17<br><b>assist [12]</b> 20/5 35/7<br>48/3 55/3 56/12 56/15<br>56/15 62/11 70/16<br>83/23 147/7 159/10<br><b>assistance [4]</b> 56/6<br>56/9 60/9 124/13<br><b>assistance' [1]</b> 5/8<br><b>assistant [19]</b> 3/17<br>39/4 40/12 45/8 45/13<br>45/14 50/24 57/14<br>57/15 61/18 62/24<br>65/9 70/3 83/12 83/13<br>83/15 83/24 94/3 98/8<br><b>assistants [1]</b> 60/15<br><b>assisting [2]</b> 2/22<br>145/5<br><b>assists [1]</b> 176/24<br><b>associated [3]</b> 14/20<br>152/5 152/11<br><b>association [7]</b> 65/23<br>77/5 77/7 77/11 82/16<br>103/3 118/17<br><b>assume [3]</b> 55/2<br>74/23 163/15<br><b>assumed [1]</b> 128/5<br><b>assuming [2]</b> 61/4<br>74/23<br><b>assumption [3]</b><br>54/24 128/9 162/2<br><b>assure [1]</b> 36/9<br><b>at [341]</b><br><b>at page 8 [2]</b> 136/24<br>153/25<br><b>ATMs [1]</b> 138/1<br><b>attach [2]</b> 6/17 18/20<br><b>attached [10]</b> 5/9<br>10/9 13/18 18/17 19/5<br>20/17 21/3 33/10<br>76/24 79/6<br><b>attaching [1]</b> 22/10<br><b>attachment [8]</b> 12/20<br>12/22 17/23 19/16<br>21/8 21/11 22/5 22/11<br><b>attempt [6]</b> 32/16<br>85/19 113/5 149/11<br>149/13 162/3<br><b>attempted [1]</b> 155/21<br><b>attempting [2]</b><br>150/19 171/4<br><b>attend [2]</b> 45/22 63/8<br><b>attendance [3]</b><br>154/10 163/5 172/13<br><b>attended [3]</b> 141/22<br>142/1 142/3<br><b>attendees [1]</b> 153/20<br><b>attending [2]</b> 107/1<br>118/21<br><b>attention [1]</b> 87/6 | <b>attitude [1]</b> 122/20<br><b>attributable [1]</b> 43/7<br><b>attributed [1]</b> 29/8<br><b>audit [13]</b> 24/16<br>102/19 102/23 102/24<br>104/19 104/20 104/25<br>105/1 105/3 105/5<br>105/5 105/18 105/19<br><b>Auditors [3]</b> 102/11<br>103/6 103/8<br><b>augmented [1]</b><br>136/10<br><b>August [2]</b> 138/23<br>141/7<br><b>Aujard [18]</b> 148/10<br>149/19 149/23 150/6<br>150/18 150/24 151/1<br>151/10 151/14 151/20<br>152/23 153/12 153/13<br>161/4 167/17 172/8<br>173/6 174/14<br><b>Aujard's [3]</b> 154/3<br>156/6 165/15<br><b>author [1]</b> 79/21<br><b>authority [5]</b> 83/25<br>148/14 156/3 156/4<br>156/11<br><b>available [2]</b> 46/13<br>171/9<br><b>avenues [1]</b> 80/18<br><b>avoid [1]</b> 161/18<br><b>award [1]</b> 179/12<br><b>aware [49]</b> 40/21<br>45/25 46/9 46/10<br>48/14 53/25 54/15<br>58/25 61/14 61/17<br>62/13 62/15 62/16<br>64/11 64/16 71/7 72/8<br>72/9 72/15 84/18<br>84/24 91/5 94/12 96/9<br>96/10 96/10 96/12<br>97/24 101/18 111/17<br>111/22 111/23 112/3<br>124/14 127/25 128/2<br>128/7 131/23 132/1<br>139/13 139/15 145/10<br>145/15 145/18 145/19<br>145/22 146/19 147/11<br>184/17<br><b>awareness [3]</b> 64/3<br>64/5 87/17<br><b>away [4]</b> 91/15 91/16<br>133/25 148/10 | 132/19 132/20 133/3<br>133/6 133/24 134/3<br>134/13 135/19 144/13<br>148/5 148/11 153/7<br>154/9 167/14 168/11<br>171/20 171/21 173/23<br>184/8<br><b>backdoor [1]</b> 139/5<br><b>background [6]</b><br>45/19 89/6 109/17<br>115/18 142/12 159/10<br><b>backward [1]</b> 125/11<br><b>bad [1]</b> 135/18<br><b>badly [2]</b> 58/15<br>168/13<br><b>Baines [1]</b> 13/17<br><b>Baker [5]</b> 67/25 68/8<br>100/13 100/25 101/6<br><b>Baker's [1]</b> 100/16<br><b>balance [10]</b> 25/21<br>41/11 41/13 47/18<br>52/23 55/13 59/8<br>105/2 105/6 105/7<br><b>balances [2]</b> 42/8<br>47/17<br><b>balancing [15]</b> 40/25<br>41/4 41/6 41/12 41/15<br>41/18 42/3 42/17<br>42/20 43/2 46/6 63/6<br>64/6 65/4 65/5<br><b>ball [1]</b> 135/18<br><b>bank [5]</b> 8/6 25/22<br>138/2 172/23 186/19<br><b>bank.' [1]</b> 17/2<br><b>banking [8]</b> 6/2 7/6<br>7/16 8/4 14/3 16/24<br>25/8 31/25<br><b>Barbara [6]</b> 108/17<br>108/19 108/21 108/25<br>109/2 186/21<br><b>bargain [4]</b> 75/17<br>130/21 161/8 161/15<br><b>bargained [1]</b> 161/17<br><b>bargaining [10]</b><br>73/16 75/10 92/2 92/2<br>92/6 92/12 92/16<br>92/22 102/3 102/7<br><b>barristers [3]</b> 179/20<br>179/25 180/9<br><b>based [10]</b> 20/22<br>46/23 49/5 60/20 67/3<br>86/13 122/19 122/20<br>125/17 161/7<br><b>basic [2]</b> 50/11<br>126/17<br><b>basically [2]</b> 62/18<br>143/18<br><b>basis [14]</b> 46/8 49/11<br>49/23 60/23 66/16<br>88/7 89/16 98/25<br>99/22 110/1 165/22<br>177/12 179/21 179/22<br><b>Bates [9]</b> 86/3 86/5<br>96/18 118/19 140/12 | 141/1 148/23 150/3<br>184/18<br><b>battle [1]</b> 165/21<br><b>BDO [9]</b> 110/16<br>110/22 110/22 110/24<br>110/25 184/10 184/14<br>184/21 184/22<br><b>be [216]</b><br><b>bear [3]</b> 38/4 88/1<br>152/19<br><b>bearding [1]</b> 167/10<br><b>bearing [5]</b> 65/2<br>69/16 129/20 130/19<br>179/23<br><b>beast [1]</b> 102/5<br><b>became [9]</b> 72/5<br>84/23 110/5 110/8<br>111/6 111/24 112/1<br>140/23 141/15<br><b>because [84]</b> 8/16<br>11/25 20/2 27/24<br>30/20 32/7 34/1 34/2<br>34/16 34/25 35/6<br>36/16 48/22 48/25<br>54/5 54/12 61/21 62/3<br>63/19 64/1 65/5 65/15<br>66/5 66/13 71/6 72/16<br>73/21 77/18 82/18<br>83/11 83/21 86/25<br>88/6 91/17 92/25 93/6<br>93/7 93/8 95/18 96/3<br>96/10 97/25 100/13<br>100/23 108/13 108/19<br>111/7 111/12 124/5<br>124/9 127/21 128/10<br>131/21 133/17 135/18<br>136/19 137/9 137/17<br>138/4 140/13 143/17<br>147/24 159/18 159/20<br>160/24 161/15 162/19<br>162/20 165/13 168/9<br>168/10 169/3 169/22<br>170/14 170/21 176/9<br>180/12 180/24 181/8<br>182/12 182/14 182/22<br>183/5 184/21<br><b>become [1]</b> 84/24<br><b>becoming [3]</b> 18/25<br>108/18 187/9<br><b>been [136]</b> 6/8 8/7<br>11/19 11/22 11/24<br>13/3 13/9 17/2 18/10<br>22/16 22/18 25/22<br>25/23 26/12 28/9<br>28/17 28/25 29/2 30/4<br>30/5 30/15 30/23<br>32/18 34/20 39/17<br>40/15 41/15 44/23<br>44/25 47/13 49/11<br>50/19 50/25 51/8<br>53/24 54/4 55/1 56/11<br>56/17 57/4 59/12<br>60/13 61/17 62/1 62/3<br>62/5 62/13 62/15 |
|----------|---|--|--|---|

|                              |                              |                              |                              |                             |
|------------------------------|------------------------------|------------------------------|------------------------------|-----------------------------|
| <b>B</b>                     | 108/16 113/16 141/3          | 39/5 54/13 67/2 69/2         | <b>Bracknell [1]</b> 139/9   | <b>bullying [1]</b> 103/5   |
| <b>been... [88]</b> 62/16    | <b>behaviour [2]</b> 103/7   | 69/4 69/5 69/5 69/6          | <b>branch [26]</b> 5/21      | <b>bumped [1]</b> 166/21    |
| 62/17 62/18 64/9             | 109/5                        | 69/12 69/13 69/15            | 6/13 41/7 42/25 43/14        | <b>bumping [1]</b> 168/3    |
| 64/12 64/15 67/9             | <b>behind [3]</b> 95/6 108/6 | 69/25 72/7 74/22             | 44/9 44/19 44/24             | <b>bundles [1]</b> 148/2    |
| 67/12 70/20 73/13            | 146/23                       | 76/23 77/7 78/5 82/2         | 49/21 53/1 59/9 59/11        | <b>burden [1]</b> 88/1      |
| 73/23 74/14 74/16            | <b>being [69]</b> 5/11 12/22 | 83/9 120/8 121/1             | 85/11 85/12 86/4 90/3        | <b>burial [1]</b> 115/5     |
| 80/19 85/16 85/17            | 14/7 14/21 21/24             | 121/3 121/14 121/21          | 94/14 103/12 103/19          | <b>business [12]</b> 66/17  |
| 86/1 86/2 86/13 86/16        | 22/21 26/5 29/8 40/22        | 132/16 175/11                | 103/20 103/25 104/18         | 77/13 77/13 77/15           |
| 86/18 94/8 94/9 94/18        | 42/12 44/13 45/18            | <b>beyond [2]</b> 131/24     | 104/24 105/14 110/15         | 77/22 91/22 93/9            |
| 96/1 98/22 99/8 101/1        | 50/4 50/23 53/14 54/9        | 174/12                       | 138/25                       | 105/4 108/17 111/9          |
| 101/7 102/3 102/12           | 54/17 55/3 56/4 57/8         | <b>bias [1]</b> 182/23       | <b>branches [11]</b> 39/13   | 111/13 112/6                |
| 103/14 105/15 108/7          | 59/14 63/25 64/4             | <b>big [2]</b> 25/4 169/25   | 41/3 42/1 42/16 43/11        | <b>businesses [4]</b> 66/21 |
| 108/8 108/23 108/25          | 69/18 74/20 76/1             | <b>bill [1]</b> 183/24       | 44/15 93/21 94/1             | 80/3 98/9 102/5             |
| 109/3 109/11 114/6           | 77/20 80/21 82/15            | <b>Billy [1]</b> 70/21       | 95/14 103/11 137/15          | <b>but [155]</b> 4/12 5/2   |
| 115/9 117/20 123/24          | 84/19 87/15 92/18            | <b>Binder [1]</b> 184/22     | <b>brand [2]</b> 134/8       | 5/23 8/24 14/3 14/6         |
| 124/10 125/22 125/25         | 93/6 93/13 96/22             | <b>Binder Hamlyn [1]</b>     | 151/19                       | 15/13 15/17 17/21           |
| 129/18 129/19 129/20         | 96/25 98/20 100/18           | 184/22                       | <b>breach [2]</b> 80/20      | 18/5 18/24 20/1 22/4        |
| 129/23 130/3 130/4           | 100/24 115/18 115/25         | <b>bit [9]</b> 6/22 9/1 14/1 | 145/17                       | 25/3 26/3 26/16 26/25       |
| 130/24 131/13 131/19         | 117/19 123/23 123/24         | 14/11 30/8 30/16             | <b>breached [1]</b> 145/12   | 28/3 28/14 29/2 29/20       |
| 132/7 132/8 132/18           | 125/16 128/2 130/22          | 30/18 30/21 81/3             | <b>break [14]</b> 36/16      | 30/11 30/15 30/24           |
| 133/23 134/4 138/14          | 131/17 132/11 134/10         | <b>bits [1]</b> 11/16        | 36/21 36/24 37/4 84/4        | 31/4 32/3 32/11 33/18       |
| 139/18 141/12 143/15         | 138/4 146/14 149/5           | <b>black [1]</b> 33/25       | 84/8 84/12 85/4 87/19        | 35/10 36/9 41/20            |
| 144/15 144/22 160/19         | 153/11 154/5 155/8           | <b>blame [5]</b> 17/13       | 106/9 145/24 146/6           | 42/11 44/12 46/5 49/1       |
| 161/15 166/3 168/12          | 160/21 160/22 161/22         | 27/13 29/7 31/10             | 156/14 176/20                | 49/19 51/12 54/22           |
| 168/22 169/4 170/18          | 162/25 165/21 169/11         | 108/18                       | <b>Brian [2]</b> 6/23 13/16  | 56/17 57/5 57/15            |
| 170/22 171/1 171/17          | 169/20 170/4 170/5           | <b>blocked [1]</b> 151/15    | <b>Brian's [1]</b> 6/16      | 58/18 58/19 60/22           |
| 175/7 175/9 178/4            | 172/18 176/11 183/4          | <b>blue [1]</b> 177/24       | <b>brief [2]</b> 8/2 45/15   | 61/3 61/10 61/25 63/7       |
| 178/7 178/21 179/1           | 184/13                       | <b>board [3]</b> 110/5       | <b>briefing [3]</b> 119/4    | 64/13 68/10 69/5 69/5       |
| 180/2 180/23 182/12          | <b>belief [6]</b> 13/6 38/13 | 132/16 166/8                 | 144/4 156/25                 | 70/10 70/19 71/7            |
| 182/16 183/8 186/18          | 54/14 103/19 107/22          | <b>bodies [4]</b> 71/2       | <b>briefings [1]</b> 99/20   | 72/15 72/25 73/23           |
| <b>BEER [6]</b> 1/11 3/2     | 109/1                        | 105/14 124/13 154/4          | <b>briefly [1]</b> 40/8      | 78/7 79/13 80/10            |
| 28/12 36/21 183/17           | <b>believe [30]</b> 8/18     | <b>body [5]</b> 91/3 91/7    | <b>bring [17]</b> 71/9 81/23 | 80/22 81/21 83/5 84/5       |
| 188/4                        | 10/22 31/12 69/23            | 91/10 91/23 92/21            | 101/21 111/3 115/6           | 85/18 89/16 90/8 91/5       |
| <b>before [68]</b> 1/12 1/20 | 75/18 77/10 86/2 92/8        | <b>body/trade [1]</b> 91/7   | 118/8 120/23 124/16          | 91/11 92/6 93/4 93/19       |
| 4/8 18/16 19/3 36/24         | 108/20 117/1 119/10          | <b>Bogerd [6]</b> 142/5      | 126/5 128/18 129/4           | 96/17 98/13 99/4            |
| 38/19 41/15 46/6 47/7        | 126/8 126/9 128/24           | 142/15 168/24 168/25         | 132/20 141/24 148/17         | 101/9 101/17 105/10         |
| 47/12 50/1 50/22             | 130/13 130/17 131/4          | 169/1 178/5                  | 151/22 155/11 166/11         | 105/15 108/1 109/13         |
| 51/21 57/8 60/16             | 133/23 135/5 135/10          | <b>Bogerd's [1]</b> 147/9    | <b>bringing [3]</b> 64/8     | 111/20 111/25 112/3         |
| 60/21 85/4 86/9 87/19        | 135/25 138/8 139/7           | <b>bold [1]</b> 7/13         | 64/17 87/6                   | 112/21 113/4 114/21         |
| 88/10 88/24 94/13            | 141/21 145/13 147/21         | <b>Bond [3]</b> 143/6        | <b>broad [2]</b> 149/8       | 115/4 115/13 115/21         |
| 95/11 105/4 107/8            | 152/17 160/25 171/15         | 165/10 184/13                | 173/16                       | 118/12 118/15 119/5         |
| 108/1 108/4 108/10           | 173/10                       | <b>Bonn [3]</b> 166/22       | <b>broadly [3]</b> 49/20     | 119/10 119/12 123/3         |
| 111/24 111/24 112/12         | <b>believed [3]</b> 81/13    | 167/19 168/3                 | 116/4 117/23                 | 124/2 124/4 126/9           |
| 112/12 114/6 115/3           | 81/17 108/19                 | <b>bonus [1]</b> 159/17      | <b>broke [2]</b> 186/10      | 126/19 128/10 128/16        |
| 118/10 119/1 119/2           | <b>Belinda [8]</b> 146/14    | <b>bonuses [1]</b> 133/9     | 186/12                       | 129/13 131/5 131/7          |
| 119/6 119/9 119/11           | 146/20 147/1 147/4           | <b>book [3]</b> 83/23 87/20  | <b>broken [1]</b> 174/10     | 132/1 133/8 133/16          |
| 122/11 127/24 128/15         | 147/25 148/1 151/4           | 97/22                        | <b>brought [7]</b> 60/8      | 134/2 134/6 134/24          |
| 128/22 130/1 130/21          | 164/19                       | <b>Boris [1]</b> 183/25      | 60/14 64/4 64/13             | 138/2 138/3 139/8           |
| 134/16 134/25 135/1          | <b>belongs [1]</b> 164/21    | <b>both [11]</b> 16/14 26/22 | 100/24 108/7 175/20          | 143/18 143/22 144/12        |
| 135/4 135/5 135/12           | <b>below [4]</b> 7/1 8/16    | 47/8 47/9 70/5 70/7          | <b>BT [1]</b> 70/24          | 144/15 147/10 147/22        |
| 135/22 142/7 142/16          | 51/10 107/18                 | 85/22 87/10 91/18            | <b>bubble [2]</b> 101/11     | 149/1 151/4 151/13          |
| 146/13 156/6 156/14          | <b>beneath [1]</b> 10/4      | 124/23 162/2                 | 180/13                       | 152/8 155/9 161/1           |
| 158/18 167/7 176/14          | <b>benefit [3]</b> 160/20    | <b>bottom [20]</b> 4/24      | <b>bubbled [2]</b> 101/9     | 161/5 161/13 161/18         |
| 179/4 180/19 182/11          | 169/24 179/6                 | 5/15 10/13 24/2 67/16        | 101/18                       | 162/25 163/22 165/3         |
| 183/23 184/4 187/12          | <b>best [7]</b> 14/13 38/13  | 78/8 129/5 129/14            | <b>budget [3]</b> 78/19      | 165/11 165/19 166/11        |
| <b>beg [2]</b> 89/14 136/5   | 44/21 60/12 107/22           | 138/18 141/11 144/18         | 136/19 152/8                 | 167/23 167/25 168/4         |
| <b>began [1]</b> 110/2       | 125/21 168/20                | 154/15 161/21 163/25         | <b>bugs [6]</b> 35/18 131/5  | 169/18 170/13 170/24        |
| <b>beginning [5]</b> 10/21   | <b>better [13]</b> 44/2      | 166/18 169/3 170/21          | 131/6 131/7 131/7            | 172/9 172/24 173/10         |
| 16/8 25/5 129/1 151/5        | 47/10 51/24 55/25            | 171/23 174/24 175/5          | 137/4                        | 173/12 174/2 174/17         |
| <b>behalf [13]</b> 37/14     | 56/5 66/17 73/2 73/15        | <b>bought [1]</b> 60/25      | <b>build [2]</b> 45/7 134/8  | 176/20 177/17 180/14        |
| 55/21 75/13 75/15            | 73/18 73/20 93/1             | <b>box [2]</b> 67/20 67/25   | <b>building [1]</b> 165/12   | 181/5 182/24 184/23         |
| 75/17 75/23 82/14            | 93/11 109/12                 | <b>boxes [1]</b> 23/11       | <b>bullet [8]</b> 10/9 10/13 | 185/15                      |
| 91/3 92/17 95/9              | <b>between [30]</b> 3/24     | <b>brackets [3]</b> 27/22    | 77/25 78/17 79/9             | <b>buy [1]</b> 111/10       |
|                              | 27/20 29/19 33/21            | 31/3 31/8                    | 80/10 168/16 168/23          |                             |

|  |  |  |  |  |
|--|--|--|--|--|
| <p><b>C</b><br/> <b>called [15]</b> 43/20<br/> 44/7 47/4 49/21 49/22<br/> 57/12 59/8 67/21<br/> 82/25 92/5 131/7<br/> 141/18 146/20 161/25<br/> 184/9<br/> <b>calling [1]</b> 187/5<br/> <b>calls [2]</b> 112/24<br/> 153/23<br/> <b>came [14]</b> 18/19 19/4<br/> 63/25 67/6 70/13<br/> 124/1 128/22 150/23<br/> 151/1 151/20 154/13<br/> 159/25 174/22 180/17<br/> <b>Camelot [1]</b> 172/23<br/> <b>campaign [4]</b> 86/7<br/> 87/18 113/12 124/8<br/> <b>can [181]</b> 1/3 1/5 1/5<br/> 1/6 3/14 3/14 4/14<br/> 4/17 4/18 4/19 4/23<br/> 4/23 6/1 6/3 6/11 6/21<br/> 7/11 7/17 7/22 9/7 9/8<br/> 9/9 9/16 9/17 10/19<br/> 10/21 13/12 14/7 15/5<br/> 15/19 15/22 18/14<br/> 18/18 19/3 19/8 20/6<br/> 21/3 21/6 21/18 21/20<br/> 21/22 21/23 22/1 22/2<br/> 22/4 22/6 22/10 22/19<br/> 22/22 22/23 22/25<br/> 23/2 23/3 23/5 23/9<br/> 23/13 23/21 24/11<br/> 26/15 26/25 27/8 27/9<br/> 27/17 27/18 27/23<br/> 28/3 30/22 31/20<br/> 32/12 32/15 33/5<br/> 33/23 35/2 35/9 36/4<br/> 36/8 36/8 36/9 37/6<br/> 37/10 37/23 38/7 44/3<br/> 47/16 47/22 48/2 56/1<br/> 62/11 62/22 62/22<br/> 67/17 68/6 69/19<br/> 71/10 71/19 75/13<br/> 75/13 75/14 75/22<br/> 76/19 76/25 79/7 81/2<br/> 81/6 81/23 84/14 85/8<br/> 86/16 88/18 88/22<br/> 91/25 94/17 95/5<br/> 101/23 101/24 106/17<br/> 106/18 107/16 107/21<br/> 109/8 111/17 112/5<br/> 112/16 113/19 115/6<br/> 115/15 118/7 118/10<br/> 119/15 120/22 120/23<br/> 126/5 131/2 132/19<br/> 133/2 133/13 134/15<br/> 138/13 141/5 141/24<br/> 142/25 143/6 143/7<br/> 143/12 144/5 146/2<br/> 146/8 146/9 146/11<br/> 148/17 148/20 150/7<br/> 151/22 153/17 153/25</p> | <p>154/7 154/7 154/14<br/> 154/14 155/11 156/13<br/> 156/15 156/15 159/23<br/> 159/25 163/3 163/5<br/> 163/25 165/2 165/4<br/> 166/18 168/8 168/17<br/> 171/19 173/22 174/24<br/> 175/25 179/12 181/4<br/> 183/7 183/10<br/> <b>can't [17]</b> 11/25<br/> 18/11 19/6 19/7 22/5<br/> 26/9 26/9 30/14<br/> 119/10 131/5 133/18<br/> 138/1 155/10 157/8<br/> 166/5 167/21 174/15<br/> <b>cancelled [1]</b> 176/10<br/> <b>cannot [3]</b> 18/21 76/7<br/> 86/14<br/> <b>capable [1]</b> 145/4<br/> <b>capacity [1]</b> 180/24<br/> <b>card [1]</b> 186/13<br/> <b>care [1]</b> 133/6<br/> <b>carried [3]</b> 102/16<br/> 105/10 169/4<br/> <b>carries [1]</b> 64/19<br/> <b>carry [3]</b> 89/18<br/> 140/14 146/10<br/> <b>carrying [3]</b> 104/16<br/> 119/25 125/19<br/> <b>case [72]</b> 3/9 3/23<br/> 4/1 19/12 24/6 29/7<br/> 35/2 36/6 55/1 56/14<br/> 56/16 57/24 59/24<br/> 62/18 63/14 74/1<br/> 87/23 91/4 91/19 98/9<br/> 100/20 111/18 111/24<br/> 120/1 120/7 120/11<br/> 120/14 120/16 123/21<br/> 124/11 130/20 130/20<br/> 131/14 132/1 144/18<br/> 144/21 145/4 147/7<br/> 148/1 154/24 156/9<br/> 156/19 156/20 156/21<br/> 157/7 157/9 157/12<br/> 158/1 158/5 158/10<br/> 158/11 158/23 159/11<br/> 159/22 160/5 160/6<br/> 160/18 160/24 161/12<br/> 161/15 163/6 163/10<br/> 163/12 163/24 165/7<br/> 165/17 173/17 179/10<br/> 181/6 184/12 184/16<br/> 184/17<br/> <b>cases [62]</b> 5/7 5/10<br/> 7/25 47/2 47/4 48/14<br/> 48/20 48/21 49/3<br/> 49/15 49/17 55/4<br/> 55/21 57/4 57/7 57/10<br/> 57/13 57/19 57/23<br/> 58/6 58/10 58/17<br/> 60/10 62/17 63/7<br/> 63/12 115/19 116/7<br/> 116/10 117/20 117/21<br/> 117/25 122/22 124/7</p> | <p>131/1 135/11 136/3<br/> 136/8 136/9 136/11<br/> 147/16 147/22 148/3<br/> 148/16 148/16 152/19<br/> 152/20 153/11 155/8<br/> 155/13 155/21 157/5<br/> 157/17 157/23 157/24<br/> 158/9 158/14 158/16<br/> 158/24 159/18 169/5<br/> 169/21<br/> <b>Casework [3]</b> 3/17<br/> 3/19 3/23<br/> <b>cash [2]</b> 39/14 94/4<br/> <b>casting [1]</b> 161/25<br/> <b>Castleton [2]</b> 179/10<br/> 184/16<br/> <b>Castleton's [2]</b><br/> 184/12 184/17<br/> <b>categories [2]</b> 66/2<br/> 66/4<br/> <b>CATHERINE [3]</b><br/> 106/22 106/25 188/14<br/> <b>caught [4]</b> 57/6<br/> 141/12 162/25 165/21<br/> <b>cause [5]</b> 53/5 111/2<br/> 131/10 163/22 164/12<br/> <b>caused [9]</b> 28/20<br/> 33/2 42/21 43/3 85/15<br/> 113/6 121/7 130/5<br/> 132/25<br/> <b>causes [1]</b> 15/4<br/> <b>causing [2]</b> 44/25<br/> 126/18<br/> <b>caution [1]</b> 144/22<br/> <b>caveat [1]</b> 116/18<br/> <b>cease [1]</b> 79/3<br/> <b>ceased [1]</b> 48/19<br/> <b>cent [3]</b> 120/18 133/1<br/> 180/22<br/> <b>centrally [1]</b> 56/9<br/> <b>centres [1]</b> 39/14<br/> <b>CEO [3]</b> 74/17 132/16<br/> 132/23<br/> <b>certain [7]</b> 54/19<br/> 80/23 102/23 115/4<br/> 131/9 133/17 170/10<br/> <b>certainly [7]</b> 20/25<br/> 34/8 61/4 86/23<br/> 100/16 139/8 183/5<br/> <b>Certification [2]</b><br/> 77/16 77/18<br/> <b>cessation [1]</b> 78/10<br/> <b>cetera [1]</b> 84/2<br/> <b>CFA [1]</b> 173/9<br/> <b>Chair [10]</b> 101/13<br/> 161/25 162/9 163/8<br/> 163/18 174/2 174/9<br/> 175/4 175/6 175/9<br/> <b>Chair's [1]</b> 163/17<br/> <b>chaired [2]</b> 146/20<br/> 159/2<br/> <b>chairing [1]</b> 147/14<br/> <b>chairman [9]</b> 18/15<br/> 18/23 26/23 67/21</p> | <p>68/1 113/9 113/14<br/> 159/6 159/7<br/> <b>challenge [3]</b> 91/16<br/> 91/21 149/10<br/> <b>challenged [3]</b> 5/11<br/> 115/12 115/15<br/> <b>challenges [1]</b> 71/23<br/> <b>challenging [1]</b> 88/2<br/> <b>Chambers [2]</b> 165/10<br/> 178/16<br/> <b>chance [2]</b> 168/20<br/> 177/14<br/> <b>change [9]</b> 25/21<br/> 50/8 81/9 150/5 150/7<br/> 151/2 151/3 151/19<br/> 166/6<br/> <b>changed [2]</b> 49/19<br/> 59/16<br/> <b>changes [10]</b> 3/8 4/3<br/> 4/4 19/11 19/11 22/20<br/> 23/10 36/5 50/10 85/5<br/> <b>characterised [1]</b><br/> 52/4<br/> <b>charge [1]</b> 161/18<br/> <b>chartered [2]</b> 109/18<br/> 110/3<br/> <b>chat [1]</b> 168/4<br/> <b>check [9]</b> 1/5 105/7<br/> 116/19 130/22 132/24<br/> 170/25 176/20 184/5<br/> 185/6<br/> <b>checked [1]</b> 56/18<br/> <b>checking [3]</b> 116/22<br/> 117/2 120/18<br/> <b>Chesterfield [1]</b><br/> 173/2<br/> <b>Chief [1]</b> 110/6<br/> <b>chip [1]</b> 73/16<br/> <b>choice [7]</b> 17/10<br/> 27/10 31/4 31/7 31/13<br/> 31/14 31/17<br/> <b>choose [1]</b> 145/7<br/> <b>Chris [21]</b> 148/10<br/> 149/19 149/23 150/6<br/> 150/18 150/24 151/1<br/> 151/10 151/14 151/20<br/> 152/23 153/12 153/13<br/> 154/2 156/6 161/3<br/> 165/15 167/17 172/8<br/> 173/6 174/14<br/> <b>chronology [1]</b> 140/7<br/> <b>circumstances [7]</b><br/> 60/11 68/7 131/12<br/> 158/7 158/20 161/9<br/> 162/15<br/> <b>civil [1]</b> 184/12<br/> <b>Clacton [1]</b> 166/9<br/> <b>Clacton-on-Sea [1]</b><br/> 166/9<br/> <b>claim [9]</b> 17/12 27/12<br/> 31/9 91/10 123/12<br/> 156/7 157/1 177/13<br/> 181/3<br/> <b>claimant [3]</b> 180/16</p> | <p>183/3 183/8<br/> <b>claimants [9]</b> 156/25<br/> 165/20 166/3 167/13<br/> 178/21 179/8 180/3<br/> 180/24 181/18<br/> <b>claimants' [1]</b> 179/3<br/> <b>clarificatory [2]</b><br/> 16/16 25/15<br/> <b>clarify [3]</b> 38/17<br/> 111/17 174/7<br/> <b>clarity [2]</b> 14/25<br/> 17/21<br/> <b>Clarke [2]</b> 145/10<br/> 145/13<br/> <b>classes [1]</b> 50/7<br/> <b>Clause [2]</b> 152/3<br/> 152/4<br/> <b>Clause 4.10.1 [1]</b><br/> 152/4<br/> <b>Clause 4.9 [1]</b> 152/3<br/> <b>clauses [1]</b> 91/7<br/> <b>claw [2]</b> 90/17 90/24<br/> <b>clear [15]</b> 2/5 8/25<br/> 14/1 38/25 94/7<br/> 123/10 130/16 131/13<br/> 135/4 138/9 140/5<br/> 140/15 140/16 151/16<br/> 179/11<br/> <b>cleared [1]</b> 164/13<br/> <b>clearer [1]</b> 8/12<br/> <b>clearly [5]</b> 14/7 99/2<br/> 143/15 164/11 182/19<br/> <b>Clerical [1]</b> 94/3<br/> <b>clerk [5]</b> 41/10 45/20<br/> 47/11 47/16 56/1<br/> <b>clerk's [1]</b> 52/23<br/> <b>clerks [6]</b> 39/12<br/> 47/11 47/15 51/7<br/> 82/24 102/17<br/> <b>close [2]</b> 151/17<br/> 151/17<br/> <b>closed [1]</b> 15/12<br/> <b>closely [2]</b> 45/21<br/> 124/25<br/> <b>closing [1]</b> 105/7<br/> <b>Co [1]</b> 108/9<br/> <b>coalface [2]</b> 44/3<br/> 55/25<br/> <b>code [7]</b> 10/2 10/14<br/> 29/12 29/21 30/11<br/> 32/5 126/18<br/> <b>codes [2]</b> 8/11 9/16<br/> <b>coding [1]</b> 121/4<br/> <b>coercive [1]</b> 109/5<br/> <b>cohort [2]</b> 68/24 76/3<br/> <b>coincidental [1]</b><br/> 166/21<br/> <b>collaborate [1]</b> 70/10<br/> <b>collapse [1]</b> 86/22<br/> <b>collective [10]</b> 50/18<br/> 75/9 92/1 92/2 92/6<br/> 92/12 92/16 92/22<br/> 102/2 102/6<br/> <b>colossal [1]</b> 120/4</p> |
|--|--|--|--|--|

|  |   |   |   |
|--|---|---|---|
| <p><b>C</b></p> <p><b>colourful [1]</b> 182/16</p> <p><b>come [31]</b> 12/8 18/2 42/11 50/1 54/15 54/20 54/22 56/7 56/25 57/1 72/14 72/19 80/23 91/6 101/13 112/5 112/21 114/16 118/7 119/14 120/22 134/15 140/17 144/13 148/5 165/2 167/2 170/2 171/19 171/21 180/9</p> <p><b>comes [4]</b> 32/2 118/10 129/12 145/3</p> <p><b>comfortably [1]</b> 91/8</p> <p><b>coming [5]</b> 48/7 62/23 97/9 100/13 153/7</p> <p><b>commenced [2]</b> 28/9 28/18</p> <p><b>comment [5]</b> 14/4 23/11 28/25 34/12 169/15</p> <p><b>comments [4]</b> 13/19 16/9 20/18 33/11</p> <p><b>commercial [1]</b> 79/20</p> <p><b>commercially [1]</b> 80/14</p> <p><b>commissioned [1]</b> 122/14</p> <p><b>commissioning [1]</b> 122/15</p> <p><b>committee [4]</b> 135/8 144/16 146/20 164/10</p> <p><b>committees [1]</b> 94/13</p> <p><b>common [4]</b> 44/3 71/3 71/4 113/4</p> <p><b>communicate [2]</b> 70/9 125/8</p> <p><b>communication [13]</b> 39/4 39/18 40/4 42/5 46/13 48/10 65/20 65/23 68/8 69/25 89/22 103/2 126/22</p> <p><b>company [2]</b> 85/20 91/17</p> <p><b>comparatives [1]</b> 182/17</p> <p><b>compared [1]</b> 133/8</p> <p><b>compensate [2]</b> 109/11 143/16</p> <p><b>compensation [2]</b> 143/12 143/19</p> <p><b>competent [1]</b> 158/20</p> <p><b>complainant [1]</b> 116/9</p> <p><b>complainants [3]</b> 114/23 115/24 141/20</p> <p><b>complaining [1]</b> 65/4</p> <p><b>complaint [4]</b> 62/25 136/3 136/7 144/6</p> <p><b>complaints [5]</b> 114/13 122/18 123/7 125/15 141/18</p> <p><b>complete [3]</b> 121/17 155/10 171/10</p> <p><b>completed [3]</b> 120/1 144/19 182/11</p> <p><b>completely [2]</b> 97/17 132/13</p> <p><b>completes [1]</b> 36/20</p> <p><b>completion [1]</b> 148/16</p> <p><b>complex [1]</b> 126/22</p> <p><b>complexity [1]</b> 174/3</p> <p><b>complicated [1]</b> 173/7</p> <p><b>compromise [2]</b> 81/14 144/15</p> <p><b>compromised [3]</b> 81/13 82/10 144/11</p> <p><b>compromising [1]</b> 82/11</p> <p><b>Compton [1]</b> 186/7</p> <p><b>computer [13]</b> 11/11 22/7 86/16 113/7 121/9 121/16 121/19 128/10 130/5 131/8 131/14 133/2 149/21</p> <p><b>concept [1]</b> 116/1</p> <p><b>concepts [1]</b> 121/10</p> <p><b>concern [15]</b> 11/19 11/22 11/24 45/2 62/25 85/13 99/18 99/23 125/25 131/19 134/5 152/12 163/17 163/18 163/21</p> <p><b>concerned [13]</b> 14/16 17/17 17/20 54/11 59/7 84/22 88/7 92/1 100/2 115/10 133/23 170/18 185/12</p> <p><b>concerning [2]</b> 169/17 184/1</p> <p><b>concerns [23]</b> 46/12 65/8 69/25 70/8 82/3 83/10 85/22 87/6 87/9 87/10 100/24 101/22 122/5 122/25 123/18 133/21 134/12 138/14 146/25 147/19 149/1 153/6 171/24</p> <p><b>concluded [1]</b> 72/7</p> <p><b>concludes [1]</b> 106/3</p> <p><b>conclusion [4]</b> 81/2 137/8 137/10 183/13</p> <p><b>conclusions [3]</b> 122/7 136/25 137/7</p> <p><b>conditional [2]</b> 178/25 179/21</p> <p><b>conditions [6]</b> 66/25 75/16 79/6 80/23 92/14 92/19</p> | <p><b>conduct [4]</b> 28/20 59/23 104/4 104/16</p> <p><b>conducted [1]</b> 105/2</p> <p><b>conducting [3]</b> 104/7 104/14 145/20</p> <p><b>conference [1]</b> 71/25</p> <p><b>confidence [2]</b> 176/20 177/5</p> <p><b>confident [1]</b> 119/12</p> <p><b>confidential [1]</b> 80/14</p> <p><b>confidentiality [1]</b> 80/15</p> <p><b>confirm [1]</b> 41/6</p> <p><b>confirmed [5]</b> 40/20 41/24 152/6 173/6 174/5</p> <p><b>confirming [2]</b> 138/22 185/17</p> <p><b>conflict [1]</b> 138/20</p> <p><b>conflicts [1]</b> 80/17</p> <p><b>confusing [1]</b> 14/12</p> <p><b>confusion [2]</b> 28/11 126/15</p> <p><b>connection [3]</b> 27/20 27/23 27/24</p> <p><b>consensual [1]</b> 160/16</p> <p><b>consequence [1]</b> 81/9</p> <p><b>consequences [1]</b> 103/22</p> <p><b>consider [18]</b> 2/12 2/22 52/8 66/8 69/15 71/23 75/6 89/13 104/14 114/8 122/3 157/14 158/8 158/23 161/25 163/8 163/23 169/20</p> <p><b>consideration [1]</b> 71/11</p> <p><b>considered [4]</b> 43/19 47/20 145/3 160/10</p> <p><b>considering [2]</b> 20/20 123/15</p> <p><b>consistent [2]</b> 26/7 75/2</p> <p><b>consistently [2]</b> 30/4 92/7</p> <p><b>constitution [2]</b> 85/5 113/3</p> <p><b>consultations [1]</b> 128/8</p> <p><b>consulted [1]</b> 128/3</p> <p><b>contact [6]</b> 3/24 44/8 86/4 109/9 113/25 125/1</p> <p><b>contacted [3]</b> 62/17 63/21 63/22</p> <p><b>contacting [1]</b> 128/11</p> <p><b>contained [1]</b> 85/7</p> <p><b>contemporaneous [1]</b> 167/23</p> | <p><b>content [4]</b> 38/12 134/23 134/24 134/25</p> <p><b>contents [1]</b> 183/23</p> <p><b>contested [1]</b> 181/24</p> <p><b>context [11]</b> 4/14 9/1 30/8 32/12 33/18 34/25 35/3 71/19 97/1 127/9 160/20</p> <p><b>continue [4]</b> 109/7 136/2 136/13 153/14</p> <p><b>continues [1]</b> 108/14</p> <p><b>continuing [2]</b> 85/22 138/21</p> <p><b>contract [5]</b> 66/18 73/9 87/2 131/11 136/18</p> <p><b>contracts [1]</b> 67/2</p> <p><b>contractual [3]</b> 66/16 75/5 80/18</p> <p><b>contrary [1]</b> 26/21</p> <p><b>control [2]</b> 146/24 172/23</p> <p><b>controlling [1]</b> 109/5</p> <p><b>convenient [1]</b> 129/13</p> <p><b>conventional [2]</b> 22/9 22/14</p> <p><b>conversation [6]</b> 167/4 167/8 171/17 174/12 176/1 176/2</p> <p><b>convicted [1]</b> 161/6</p> <p><b>conviction [9]</b> 144/20 144/23 144/25 145/8 159/21 161/1 161/3 161/5 161/7</p> <p><b>convictions [3]</b> 61/15 145/21 156/15</p> <p><b>convince [1]</b> 124/10</p> <p><b>cope [1]</b> 181/15</p> <p><b>copied [1]</b> 126/10</p> <p><b>copy [12]</b> 15/23 19/17 20/12 21/16 38/3 38/5 71/15 76/22 119/18 126/9 143/5 156/21</p> <p><b>Core [1]</b> 185/6</p> <p><b>corner [1]</b> 4/24</p> <p><b>correct [66]</b> 3/21 4/2 4/7 24/10 25/16 25/17 32/1 32/24 37/21 38/21 38/22 39/6 39/11 39/16 39/20 40/3 40/18 40/19 40/24 41/16 42/2 46/4 51/1 51/2 60/18 61/10 61/16 65/12 70/12 71/14 82/11 82/12 83/18 86/7 87/6 89/24 89/25 92/9 93/22 93/23 94/3 94/10 95/1 95/15 95/24 96/7 107/12 109/19 109/21 112/11 114/5 116/21 117/22 118/24 119/23</p> | <p>124/20 128/24 143/4 143/5 146/17 157/7 163/13 163/14 165/9 167/11 176/6</p> <p><b>corrections [1]</b> 139/10</p> <p><b>corrective [1]</b> 48/1</p> <p><b>correctly [5]</b> 35/18 59/23 62/14 62/15 161/16</p> <p><b>corresponded [1]</b> 155/2</p> <p><b>correspondence [4]</b> 57/2 74/8 74/19 154/22</p> <p><b>cost [2]</b> 120/19 124/4</p> <p><b>costs [6]</b> 179/9 179/12 179/16 181/24 183/1 184/1</p> <p><b>coughs [1]</b> 179/15</p> <p><b>could [77]</b> 8/17 18/9 20/25 33/2 34/8 34/22 38/4 46/17 48/2 52/17 56/15 67/19 70/7 71/9 74/4 78/16 80/5 81/1 81/18 85/1 88/4 91/9 94/23 96/5 96/23 97/2 101/2 101/3 102/12 104/3 106/24 107/3 107/9 111/1 111/2 111/4 112/2 117/13 118/8 119/16 121/24 121/25 123/4 123/8 124/16 126/5 128/18 129/4 129/4 132/20 134/16 136/23 136/24 138/18 139/17 141/20 144/16 148/6 149/12 151/6 160/2 160/3 161/4 164/14 165/22 166/11 171/1 171/23 172/11 172/13 173/17 173/21 176/3 179/23 182/15 182/23 187/7</p> <p><b>couldn't [11]</b> 43/5 52/21 59/12 83/12 88/4 97/11 124/4 134/2 158/21 170/20 176/19</p> <p><b>Council [6]</b> 67/10 68/14 71/11 82/20 83/5 101/23</p> <p><b>counsel [4]</b> 150/1 150/8 178/15 178/24</p> <p><b>counselling [1]</b> 109/8</p> <p><b>counter [13]</b> 39/12 41/10 45/20 47/11 47/11 47/15 47/16 51/7 52/22 56/1 63/7 82/24 102/17</p> <p><b>countersigned [1]</b> 136/17</p> <p><b>couple [5]</b> 56/24 84/6 90/5 101/25 112/23</p> |
|--|---|---|---|

|   |  |   |   |  |
|---|--|---|---|--|
| <p><b>C</b></p> <p><b>course [8]</b> 18/23<br/>23/19 89/10 119/14<br/>123/7 128/16 160/11<br/>168/5</p> <p><b>court [16]</b> 20/25 32/8<br/>34/8 34/22 35/15 90/8<br/>108/10 111/11 123/5<br/>145/12 145/17 146/22<br/>159/3 179/11 179/11<br/>182/4</p> <p><b>courts [1]</b> 145/1</p> <p><b>cover [3]</b> 8/10 32/23<br/>109/15</p> <p><b>coverage [1]</b> 98/18</p> <p><b>covered [1]</b> 126/8</p> <p><b>covering [5]</b> 5/23<br/>32/16 34/13 34/19<br/>155/3</p> <p><b>credible [2]</b> 168/19<br/>169/14</p> <p><b>credit [1]</b> 186/13</p> <p><b>credited [1]</b> 175/21</p> <p><b>Crichton [8]</b> 141/1<br/>141/3 141/4 142/4<br/>149/16 150/6 150/8<br/>151/1</p> <p><b>Crichton's [1]</b> 141/8</p> <p><b>criminal [28]</b> 11/10<br/>32/16 52/12 60/7<br/>60/10 96/4 96/16<br/>97/13 111/15 126/2<br/>131/25 133/15 133/22<br/>134/12 143/23 144/1<br/>144/19 144/23 144/25<br/>145/1 145/14 156/15<br/>159/18 159/21 160/25<br/>161/2 161/5 161/7</p> <p><b>criteria [1]</b> 77/19</p> <p><b>critical [1]</b> 124/9</p> <p><b>criticise [3]</b> 91/12<br/>92/21 165/19</p> <p><b>criticism [2]</b> 93/1<br/>93/14</p> <p><b>cross [1]</b> 138/4</p> <p><b>Crowe [7]</b> 146/14<br/>146/20 147/4 147/25<br/>148/1 151/4 164/19</p> <p><b>Crowe's [1]</b> 147/1</p> <p><b>Crown [15]</b> 39/13<br/>41/2 41/10 45/20<br/>55/11 55/11 66/13<br/>94/4 95/14 95/23 96/1<br/>97/20 101/2 101/22<br/>105/1</p> <p><b>CRR [2]</b> 156/8 157/16</p> <p><b>culminate [1]</b> 87/1</p> <p><b>current [4]</b> 78/6<br/>87/11 117/19 117/25</p> <p><b>currently [1]</b> 86/4</p> <p><b>curveball [1]</b> 162/20</p> <p><b>customer [1]</b> 91/21</p> <p><b>cut [1]</b> 169/9</p> | <p><b>cuts [1]</b> 7/10</p> <p><b>CWU [75]</b> 39/8 46/20<br/>46/25 49/8 49/17<br/>50/18 53/3 53/13<br/>53/16 54/7 57/4 57/7<br/>57/13 58/20 59/3 60/6<br/>60/9 63/17 65/9 65/14<br/>67/6 67/12 67/21 68/2<br/>71/21 71/24 72/25<br/>73/10 74/22 75/3 75/6<br/>75/12 76/10 78/9 81/2<br/>81/10 81/12 81/17<br/>81/22 82/19 85/22<br/>86/4 86/6 86/18 87/9<br/>87/12 87/21 88/1<br/>89/22 89/24 91/19<br/>92/5 92/17 93/19<br/>93/20 93/25 94/14<br/>96/2 96/23 98/12<br/>98/13 98/19 100/13<br/>100/21 100/25 101/10<br/>101/14 101/21 101/23<br/>102/12 102/24 103/2<br/>104/15 104/19 105/10</p> <p><b>CWU's [2]</b> 65/8 93/19</p> <p><b>CWU00000076 [2]</b><br/>71/9 85/3</p> <p><b>D</b></p> <p><b>daily [3]</b> 46/8 88/7<br/>124/25</p> <p><b>damage [5]</b> 15/4<br/>90/18 90/25 109/4<br/>123/3</p> <p><b>damages [5]</b> 109/11<br/>113/6 133/7 150/21<br/>151/18</p> <p><b>damaging [9]</b> 13/21<br/>13/23 14/18 20/20<br/>33/15 33/17 33/20<br/>34/1 35/6</p> <p><b>data [15]</b> 6/3 6/17<br/>7/17 12/15 13/4 15/10<br/>60/23 84/20 121/5<br/>126/8 128/6 137/9<br/>138/25 138/25 180/17</p> <p><b>date [11]</b> 23/2 48/20<br/>48/22 67/18 107/4<br/>119/10 129/2 129/12<br/>133/19 153/20 154/8</p> <p><b>dated [7]</b> 37/18 38/8<br/>85/2 116/15 117/9<br/>145/11 160/1</p> <p><b>dates [1]</b> 141/5</p> <p><b>Dawkins [1]</b> 13/17</p> <p><b>day [23]</b> 13/13 15/14<br/>48/23 49/23 49/23<br/>70/20 76/16 82/23<br/>82/23 98/25 98/25<br/>103/13 111/12 119/4<br/>142/3 142/21 143/4<br/>143/13 150/13 167/18<br/>167/25 168/2 187/25</p> <p><b>days [1]</b> 6/12</p> | <p><b>de [1]</b> 182/9</p> <p><b>deadlines [1]</b> 51/20</p> <p><b>deal [26]</b> 5/13 14/14<br/>29/19 44/3 44/9 44/21<br/>49/16 49/19 49/22<br/>55/21 57/12 63/9<br/>73/18 73/20 81/21<br/>87/24 93/24 97/6 98/1<br/>98/9 98/24 100/23<br/>126/14 133/9 148/6<br/>153/8</p> <p><b>dealing [20]</b> 3/16<br/>14/13 42/11 43/9<br/>43/23 49/18 57/10<br/>57/23 58/19 62/17<br/>62/18 63/5 97/19<br/>97/23 101/7 105/16<br/>115/2 142/15 142/17<br/>165/12</p> <p><b>dealings [1]</b> 103/24</p> <p><b>deals [2]</b> 98/6 99/5</p> <p><b>dealt [23]</b> 4/3 42/8<br/>42/23 44/2 44/10 45/5<br/>45/6 52/14 55/22<br/>57/18 59/18 59/24<br/>59/25 60/1 63/15<br/>63/19 65/5 74/7 82/24<br/>83/4 83/5 100/18<br/>182/11</p> <p><b>Dear [1]</b> 118/12</p> <p><b>debate [1]</b> 163/1</p> <p><b>debts [1]</b> 186/13</p> <p><b>decade [3]</b> 60/15<br/>60/16 60/21</p> <p><b>decide [3]</b> 29/4<br/>158/13 162/9</p> <p><b>decided [2]</b> 163/12<br/>183/22</p> <p><b>decides [1]</b> 72/1</p> <p><b>deciding [1]</b> 165/7</p> <p><b>decision [20]</b> 28/24<br/>28/25 29/2 68/11<br/>68/13 73/4 113/16<br/>113/17 157/5 157/8<br/>157/15 157/18 157/22<br/>157/23 158/21 160/5<br/>160/12 162/11 163/9<br/>163/17</p> <p><b>deck [1]</b> 143/5</p> <p><b>declared [1]</b> 105/8</p> <p><b>decline [2]</b> 1/24<br/>160/13</p> <p><b>declined [2]</b> 17/2<br/>25/22</p> <p><b>deduction [1]</b> 87/3</p> <p><b>deemed [1]</b> 80/20</p> <p><b>deep [2]</b> 119/25<br/>120/10</p> <p><b>defects [5]</b> 35/16<br/>35/19 35/20 125/15<br/>137/3</p> <p><b>defence [5]</b> 28/1 35/8<br/>145/5 145/6 181/2</p> <p><b>defend [2]</b> 56/6 93/11</p> | <p><b>defendant [1]</b> 32/9</p> <p><b>defendant's [1]</b> 29/7</p> <p><b>define [1]</b> 79/13</p> <p><b>defined [1]</b> 80/14</p> <p><b>definitely [4]</b> 119/5<br/>158/2 168/25 173/1</p> <p><b>definition [2]</b> 121/15<br/>127/15</p> <p><b>degree [1]</b> 80/10</p> <p><b>degrees [1]</b> 47/22</p> <p><b>delay [2]</b> 163/21<br/>164/12</p> <p><b>delete [9]</b> 15/19 17/4<br/>18/10 26/23 27/6 31/1<br/>35/6 36/1 36/2</p> <p><b>deleted [28]</b> 12/14<br/>17/5 17/15 17/22<br/>18/10 18/12 20/2<br/>25/10 25/25 26/10<br/>26/14 26/16 26/17<br/>26/25 27/24 28/3 28/5<br/>28/8 30/5 30/9 30/24<br/>30/25 32/19 33/16<br/>33/19 35/24 35/25<br/>36/10</p> <p><b>deleting [9]</b> 19/20<br/>26/8 27/3 27/14 29/5<br/>32/10 33/25 35/4<br/>35/21</p> <p><b>deletion [7]</b> 27/9<br/>27/20 28/17 30/5<br/>33/21 33/22 36/7</p> <p><b>deliberately [1]</b><br/>180/25</p> <p><b>demarcation [1]</b> 99/4</p> <p><b>den [7]</b> 142/5 142/15<br/>147/9 168/24 168/25<br/>169/1 178/5</p> <p><b>denial [1]</b> 26/22</p> <p><b>denied [4]</b> 19/19 27/3<br/>58/3 59/13</p> <p><b>department [7]</b> 45/24<br/>56/20 56/21 56/22<br/>97/5 132/13 132/14</p> <p><b>depend [1]</b> 78/5</p> <p><b>depending [1]</b> 56/16</p> <p><b>depth [3]</b> 116/7<br/>135/13 170/24</p> <p><b>Deputy [5]</b> 39/18<br/>40/1 61/19 83/16<br/>89/23</p> <p><b>derail [2]</b> 182/1 183/2</p> <p><b>Derby [1]</b> 110/3</p> <p><b>derived [1]</b> 78/5</p> <p><b>describe [6]</b> 69/9<br/>101/19 111/15 121/10<br/>167/5 167/7</p> <p><b>described [4]</b> 21/3<br/>78/9 101/13 114/18</p> <p><b>describing [1]</b><br/>156/16</p> <p><b>descriptions [1]</b><br/>29/14</p> <p><b>designed [4]</b> 47/25</p> | <p>50/16 181/18 182/25</p> <p><b>desire [3]</b> 35/14<br/>35/17 186/24</p> <p><b>desperate [1]</b> 182/15</p> <p><b>despite [1]</b> 98/18</p> <p><b>destroy [5]</b> 152/23<br/>153/12 153/15 154/25<br/>155/6</p> <p><b>destroyed [3]</b> 153/1<br/>154/2 154/19</p> <p><b>destruction [1]</b><br/>153/16</p> <p><b>detail [1]</b> 74/5</p> <p><b>detailed [3]</b> 48/21<br/>90/15 158/6</p> <p><b>details [5]</b> 56/14<br/>96/11 129/18 132/7<br/>142/14</p> <p><b>determine [2]</b> 75/5<br/>162/14</p> <p><b>detour [1]</b> 150/4</p> <p><b>detrimental [2]</b> 79/12<br/>91/18</p> <p><b>development [1]</b><br/>155/18</p> <p><b>diagonally [1]</b> 95/6</p> <p><b>Diane [1]</b> 13/17</p> <p><b>Dickinson [3]</b> 143/7<br/>165/10 184/14</p> <p><b>did [82]</b> 11/7 11/15<br/>12/25 13/22 14/10<br/>18/10 26/23 27/6<br/>28/16 31/1 31/17<br/>34/21 36/1 45/9 45/15<br/>59/17 60/6 65/9 66/11<br/>67/4 70/10 71/15 82/2<br/>82/17 83/9 84/24<br/>101/21 109/22 109/25<br/>111/19 113/17 114/10<br/>116/22 117/12 125/7<br/>127/18 129/25 130/7<br/>131/18 133/5 133/11<br/>134/18 134/22 135/2<br/>135/15 135/16 136/19<br/>137/20 138/23 139/22<br/>139/25 140/17 146/22<br/>146/25 148/12 150/24<br/>152/16 152/17 157/19<br/>160/15 165/14 165/19<br/>166/6 167/4 168/8<br/>169/1 169/3 169/11<br/>169/13 170/23 171/7<br/>172/3 172/9 175/18<br/>176/7 178/2 180/9<br/>183/3 183/5 183/19<br/>184/15 186/20</p> <p><b>didn't [40]</b> 8/22 11/1<br/>11/13 18/9 19/25<br/>25/11 26/1 30/25 31/7<br/>32/25 34/17 35/25<br/>36/2 49/16 55/7 57/23<br/>58/11 64/25 66/5 66/5<br/>68/20 82/18 93/6 96/2<br/>96/3 98/17 98/21</p> |
|---|--|---|---|--|

|  |  |  |  |  |
|--|--|--|--|--|
| <b>D</b>   | <b>disclosed [5]</b> 130/25<br>145/13 171/8 180/15<br>184/14   | <b>disrupted [1]</b> 93/5  | 144/10 153/16 153/21   | <b>down [48]</b> 4/25 5/14<br>6/21 6/22 7/22 9/9<br>13/13 15/25 16/1 19/8<br>20/9 22/13 23/14<br>23/20 24/25 25/5 33/6<br>48/3 61/3 61/9 67/19<br>67/24 79/7 103/18<br>104/24 112/5 117/13<br>118/7 119/16 120/22<br>126/6 129/13 129/16<br>134/15 148/20 150/20<br>151/17 151/25 156/16<br>156/17 160/3 163/25<br>165/2 168/16 171/19<br>172/14 174/10 182/18 |
| <b>didn't... [13]</b> 101/11<br>101/12 120/16 122/11<br>126/2 133/16 137/9<br>137/17 147/4 155/6<br>157/18 170/23 170/24   | <b>discloses [1]</b> 27/14   | <b>dissatisfaction [2]</b><br>68/16 68/18  | <b>documentary [1]</b><br>175/14   | <b>downloaded [2]</b> 6/3<br>7/17  |
| <b>difference [10]</b> 22/10<br>77/22 78/5 121/3<br>121/14 121/21 131/10<br>135/21 170/19 170/21   | <b>disclosure [6]</b> 32/8<br>147/7 147/15 147/20<br>161/9 181/24  | <b>dissatisfied [1]</b><br>100/14  | <b>documentation [8]</b><br>148/25 149/2 149/6<br>149/15 149/18 150/20<br>155/1 170/25   | <b>DR [4]</b> 106/22 187/6<br>187/10 188/14  |
| <b>differences [11]</b><br>125/22 130/5 130/8<br>149/17 150/9 162/4<br>169/6 169/8 169/17<br>172/20 172/22   | <b>discovered [5]</b> 110/4<br>129/20 129/24 130/3<br>180/12   | <b>distinct [1]</b> 66/19  | <b>documents [18]</b><br>56/20 56/23 115/11<br>115/21 148/2 150/15<br>152/19 152/23 152/24<br>153/1 153/2 153/10<br>153/13 153/15 155/4<br>155/6 155/8 181/1   | <b>Dr Linnell [2]</b> 187/6<br>187/10  |
| <b>difficulties [11]</b><br>125/22 130/5 130/8<br>149/17 150/9 162/4<br>169/6 169/8 169/17<br>172/20 172/22  | <b>discrepancies [10]</b><br>46/22 47/3 48/12<br>49/10 50/5 52/4 55/6<br>63/5 63/6 102/18  | <b>distinctly [1]</b> 67/4   | <b>doesn't [7]</b> 9/4 10/7<br>17/7 33/22 91/8<br>107/10 151/12  | <b>draft [10]</b> 9/7 12/8<br>13/19 20/1 20/17 21/5<br>33/10 77/3 122/11<br>140/4  |
| <b>different [15]</b> 65/17<br>66/19 67/5 97/18 98/4<br>102/5 102/8 104/21<br>104/23 127/2 140/15<br>140/17 152/7 164/25<br>166/7  | <b>discrepancy [4]</b><br>51/11 52/8 52/10<br>59/13  | <b>distress [1]</b> 164/12   | <b>doing [10]</b> 1/16 26/3<br>29/2 56/1 59/15 88/7<br>104/25 117/4 155/7<br>185/5   | <b>drafted [2]</b> 138/11<br>149/7   |
| <b>difficult [2]</b> 160/24<br>177/25  | <b>discuss [13]</b> 44/20<br>45/3 126/2 129/21<br>129/25 131/18 133/12<br>139/22 140/4 155/12<br>155/21 161/11 169/1   | <b>do [130]</b> 1/15 2/9<br>2/17 2/25 3/9 3/11<br>5/23 8/9 8/9 11/3<br>12/25 15/11 15/16<br>18/2 18/16 19/14<br>19/18 19/19 19/24<br>24/2 24/12 26/6 26/21<br>27/5 27/14 27/19 28/5<br>28/8 28/10 28/20<br>29/20 30/18 32/3<br>32/13 35/9 36/13 38/1<br>42/25 44/16 47/11<br>47/16 47/21 50/2<br>50/16 55/13 56/6<br>60/22 60/23 61/17<br>62/22 64/7 65/1 65/13<br>66/12 67/7 68/4 68/6<br>69/7 69/15 69/20<br>70/14 71/1 73/11<br>74/13 75/6 75/13<br>75/14 75/22 76/9<br>79/25 82/7 82/13<br>82/18 83/19 84/24<br>87/16 87/25 100/17<br>103/15 103/15 104/14<br>105/5 108/1 113/23<br>115/5 115/20 116/4<br>116/7 117/12 120/8<br>120/20 121/20 122/8<br>125/20 127/15 127/17<br>132/9 133/20 134/10<br>137/6 137/24 138/1<br>140/10 140/18 141/14<br>142/9 143/22 147/10<br>147/18 154/5 155/14<br>155/23 156/3 156/4<br>164/7 166/5 166/7<br>167/20 168/6 168/9<br>170/4 172/15 174/12<br>175/12 176/14 179/7<br>180/20 184/7 186/20<br>187/18 | <b>domain [2]</b> 97/10<br>97/10   | <b>doesn't [7]</b> 9/4 10/7<br>17/7 33/22 91/8<br>107/10 151/12  |
| <b>difficulties [5]</b> 41/4<br>41/17 42/17 44/6 45/1  | <b>discussed [20]</b> 44/23<br>46/5 70/14 76/22<br>116/2 121/11 124/22<br>130/2 132/10 133/13<br>139/12 152/2 152/18<br>154/5 154/6 160/5<br>170/20 171/15 172/18<br>183/23            | <b>do [130]</b> 1/15 2/9<br>2/17 2/25 3/9 3/11<br>5/23 8/9 8/9 11/3<br>12/25 15/11 15/16<br>18/2 18/16 19/14<br>19/18 19/19 19/24<br>24/2 24/12 26/6 26/21<br>27/5 27/14 27/19 28/5<br>28/8 28/10 28/20<br>29/20 30/18 32/3<br>32/13 35/9 36/13 38/1<br>42/25 44/16 47/11<br>47/16 47/21 50/2<br>50/16 55/13 56/6<br>60/22 60/23 61/17<br>62/22 64/7 65/1 65/13<br>66/12 67/7 68/4 68/6<br>69/7 69/15 69/20<br>70/14 71/1 73/11<br>74/13 75/6 75/13<br>75/14 75/22 76/9<br>79/25 82/7 82/13<br>82/18 83/19 84/24<br>87/16 87/25 100/17<br>103/15 103/15 104/14<br>105/5 108/1 113/23<br>115/5 115/20 116/4<br>116/7 117/12 120/8<br>120/20 121/20 122/8<br>125/20 127/15 127/17<br>132/9 133/20 134/10<br>137/6 137/24 138/1<br>140/10 140/18 141/14<br>142/9 143/22 147/10<br>147/18 154/5 155/14<br>155/23 156/3 156/4<br>164/7 166/5 166/7<br>167/20 168/6 168/9<br>170/4 172/15 174/12<br>175/12 176/14 179/7<br>180/20 184/7 186/20<br>187/18 | <b>does [12]</b> 30/9 49/24<br>53/16 53/22 60/9 75/1<br>79/13 90/18 107/6<br>144/24 158/12 160/23  | <b>draft [10]</b> 9/7 12/8<br>13/19 20/1 20/17 21/5<br>33/10 77/3 122/11<br>140/4  |
| <b>difficulty [2]</b> 89/11<br>91/14   | <b>discussing [5]</b> 102/1<br>102/3 134/19 163/6<br>172/19  | <b>do [130]</b> 1/15 2/9<br>2/17 2/25 3/9 3/11<br>5/23 8/9 8/9 11/3<br>12/25 15/11 15/16<br>18/2 18/16 19/14<br>19/18 19/19 19/24<br>24/2 24/12 26/6 26/21<br>27/5 27/14 27/19 28/5<br>28/8 28/10 28/20<br>29/20 30/18 32/3<br>32/13 35/9 36/13 38/1<br>42/25 44/16 47/11<br>47/16 47/21 50/2<br>50/16 55/13 56/6<br>60/22 60/23 61/17<br>62/22 64/7 65/1 65/13<br>66/12 67/7 68/4 68/6<br>69/7 69/15 69/20<br>70/14 71/1 73/11<br>74/13 75/6 75/13<br>75/14 75/22 76/9<br>79/25 82/7 82/13<br>82/18 83/19 84/24<br>87/16 87/25 100/17<br>103/15 103/15 104/14<br>105/5 108/1 113/23<br>115/5 115/20 116/4<br>116/7 117/12 120/8<br>120/20 121/20 122/8<br>125/20 127/15 127/17<br>132/9 133/20 134/10<br>137/6 137/24 138/1<br>140/10 140/18 141/14<br>142/9 143/22 147/10<br>147/18 154/5 155/14<br>155/23 156/3 156/4<br>164/7 166/5 166/7<br>167/20 168/6 168/9<br>170/4 172/15 174/12<br>175/12 176/14 179/7<br>180/20 184/7 186/20<br>187/18 | <b>doing [10]</b> 1/16 26/3<br>29/2 56/1 59/15 88/7<br>104/25 117/4 155/7<br>185/5   | <b>drafting [3]</b> 134/24<br>138/9 144/16   |
| <b>diligently [1]</b> 51/25  | <b>discussion [21]</b> 71/7<br>78/9 118/3 120/10<br>121/21 127/18 134/10<br>134/22 135/22 135/25<br>148/21 149/4 155/13<br>155/15 155/25 156/12<br>160/11 164/7 165/18<br>166/1 171/11 | <b>do [130]</b> 1/15 2/9<br>2/17 2/25 3/9 3/11<br>5/23 8/9 8/9 11/3<br>12/25 15/11 15/16<br>18/2 18/16 19/14<br>19/18 19/19 19/24<br>24/2 24/12 26/6 26/21<br>27/5 27/14 27/19 28/5<br>28/8 28/10 28/20<br>29/20 30/18 32/3<br>32/13 35/9 36/13 38/1<br>42/25 44/16 47/11<br>47/16 47/21 50/2<br>50/16 55/13 56/6<br>60/22 60/23 61/17<br>62/22 64/7 65/1 65/13<br>66/12 67/7 68/4 68/6<br>69/7 69/15 69/20<br>70/14 71/1 73/11<br>74/13 75/6 75/13<br>75/14 75/22 76/9<br>79/25 82/7 82/13<br>82/18 83/19 84/24<br>87/16 87/25 100/17<br>103/15 103/15 104/14<br>105/5 108/1 113/23<br>115/5 115/20 116/4<br>116/7 117/12 120/8<br>120/20 121/20 122/8<br>125/20 127/15 127/17<br>132/9 133/20 134/10<br>137/6 137/24 138/1<br>140/10 140/18 141/14<br>142/9 143/22 147/10<br>147/18 154/5 155/14<br>155/23 156/3 156/4<br>164/7 166/5 166/7<br>167/20 168/6 168/9<br>170/4 172/15 174/12<br>175/12 176/14 179/7<br>180/20 184/7 186/20<br>187/18 | <b>domain [2]</b> 97/10<br>97/10   | <b>drafts [2]</b> 130/2<br>134/19  |
| <b>diminished [1]</b> 95/17  | <b>discussions [17]</b><br>46/1 68/10 71/1 72/24<br>73/3 73/14 73/19<br>92/18 140/8 140/11<br>140/22 140/25 141/4<br>141/6 165/6 165/23<br>178/6                                       | <b>do [130]</b> 1/15 2/9<br>2/17 2/25 3/9 3/11<br>5/23 8/9 8/9 11/3<br>12/25 15/11 15/16<br>18/2 18/16 19/14<br>19/18 19/19 19/24<br>24/2 24/12 26/6 26/21<br>27/5 27/14 27/19 28/5<br>28/8 28/10 28/20<br>29/20 30/18 32/3<br>32/13 35/9 36/13 38/1<br>42/25 44/16 47/11<br>47/16 47/21 50/2<br>50/16 55/13 56/6<br>60/22 60/23 61/17<br>62/22 64/7 65/1 65/13<br>66/12 67/7 68/4 68/6<br>69/7 69/15 69/20<br>70/14 71/1 73/11<br>74/13 75/6 75/13<br>75/14 75/22 76/9<br>79/25 82/7 82/13<br>82/18 83/19 84/24<br>87/16 87/25 100/17<br>103/15 103/15 104/14<br>105/5 108/1 113/23<br>115/5 115/20 116/4<br>116/7 117/12 120/8<br>120/20 121/20 122/8<br>125/20 127/15 127/17<br>132/9 133/20 134/10<br>137/6 137/24 138/1<br>140/10 140/18 141/14<br>142/9 143/22 147/10<br>147/18 154/5 155/14<br>155/23 156/3 156/4<br>164/7 166/5 166/7<br>167/20 168/6 168/9<br>170/4 172/15 174/12<br>175/12 176/14 179/7<br>180/20 184/7 186/20<br>187/18 | <b>don't [73]</b> 10/3 12/12<br>15/15 17/3 17/8 27/16<br>28/24 31/12 31/18<br>31/18 32/11 33/4<br>35/10 38/23 48/21<br>49/1 49/14 49/16<br>53/21 53/21 54/2<br>54/11 54/22 62/20<br>62/21 64/18 64/18<br>66/8 69/19 69/23<br>70/15 71/6 74/16<br>75/19 76/13 76/15<br>83/6 84/25 88/6 96/5<br>96/15 98/16 98/21<br>99/14 103/23 105/24<br>113/13 113/22 119/2<br>119/5 126/12 133/11<br>133/17 135/25 137/10<br>138/2 138/7 138/10<br>138/17 139/16 140/3<br>140/5 151/18 152/17<br>152/23 165/2 165/19<br>168/13 171/6 171/15<br>173/10 173/13 176/22 | <b>drama [1]</b> 186/6   |
| <b>dire [1]</b> 133/25   | <b>disgraceful [2]</b><br>182/22 182/25  | <b>do [130]</b> 1/15 2/9<br>2/17 2/25 3/9 3/11<br>5/23 8/9 8/9 11/3<br>12/25 15/11 15/16<br>18/2 18/16 19/14<br>19/18 19/19 19/24<br>24/2 24/12 26/6 26/21<br>27/5 27/14 27/19 28/5<br>28/8 28/10 28/20<br>29/20 30/18 32/3<br>32/13 35/9 36/13 38/1<br>42/25 44/16 47/11<br>47/16 47/21 50/2<br>50/16 55/13 56/6<br>60/22 60/23 61/17<br>62/22 64/7 65/1 65/13<br>66/12 67/7 68/4 68/6<br>69/7 69/15 69/20<br>70/14 71/1 73/11<br>74/13 75/6 75/13<br>75/14 75/22 76/9<br>79/25 82/7 82/13<br>82/18 83/19 84/24<br>87/16 87/25 100/17<br>103/15 103/15 104/14<br>105/5 108/1 113/23<br>115/5 115/20 116/4<br>116/7 117/12 120/8<br>120/20 121/20 122/8<br>125/20 127/15 127/17<br>132/9 133/20 134/10<br>137/6 137/24 138/1<br>140/10 140/18 141/14<br>142/9 143/22 147/10<br>147/18 154/5 155/14<br>155/23 156/3 156/4<br>164/7 166/5 166/7<br>167/20 168/6 168/9<br>170/4 172/15 174/12<br>175/12 176/14 179/7<br>180/20 184/7 186/20<br>187/18 | <b>done [12]</b> 12/14<br>17/16 19/2 46/2 71/16<br>87/16 108/13 142/11<br>143/15 161/19 170/13<br>180/2  | <b>drastic [2]</b> 8/19 8/22   |
| <b>direct [10]</b> 33/20<br>39/24 40/5 40/5 54/7<br>64/24 75/15 94/9<br>128/11 138/10  | <b>disingenuous [1]</b><br>147/16  | <b>do [130]</b> 1/15 2/9<br>2/17 2/25 3/9 3/11<br>5/23 8/9 8/9 11/3<br>12/25 15/11 15/16<br>18/2 18/16 19/14<br>19/18 19/19 19/24<br>24/2 24/12 26/6 26/21<br>27/5 27/14 27/19 28/5<br>28/8 28/10 28/20<br>29/20 30/18 32/3<br>32/13 35/9 36/13 38/1<br>42/25 44/16 47/11<br>47/16 47/21 50/2<br>50/16 55/13 56/6<br>60/22 60/23 61/17<br>62/22 64/7 65/1 65/13<br>66/12 67/7 68/4 68/6<br>69/7 69/15 69/20<br>70/14 71/1 73/11<br>74/13 75/6 75/13<br>75/14 75/22 76/9<br>79/25 82/7 82/13<br>82/18 83/19 84/24<br>87/16 87/25 100/17<br>103/15 103/15 104/14<br>105/5 108/1 113/23<br>115/5 115/20 116/4<br>116/7 117/12 120/8<br>120/20 121/20 122/8<br>125/20 127/15 127/17<br>132/9 133/20 134/10<br>137/6 137/24 138/1<br>140/10 140/18 141/14<br>142/9 143/22 147/10<br>147/18 154/5 155/14<br>155/23 156/3 156/4<br>164/7 166/5 166/7<br>167/20 168/6 168/9<br>170/4 172/15 174/12<br>175/12 176/14 179/7<br>180/20 184/7 186/20<br>187/18 | <b>drive [2]</b> 5/13 5/13   | <b>drawn [1]</b> 67/18   |
| <b>direction [7]</b> 1/14<br>1/22 68/18 91/16 93/8<br>149/20 150/23  | <b>dismiss [1]</b> 62/19   | <b>do [130]</b> 1/15 2/9<br>2/17 2/25 3/9 3/11<br>5/23 8/9 8/9 11/3<br>12/25 15/11 15/16<br>18/2 18/16 19/14<br>19/18 19/19 19/24<br>24/2 24/12 26/6 26/21<br>27/5 27/14 27/19 28/5<br>28/8 28/10 28/20<br>29/20 30/18 32/3<br>32/13 35/9 36/13 38/1<br>42/25 44/16 47/11<br>47/16 47/21 50/2<br>50/16 55/13 56/6<br>60/22 60/23 61/17<br>62/22 64/7 65/1 65/13<br>66/12 67/7 68/4 68/6<br>69/7 69/15 69/20<br>70/14 71/1 73/11<br>74/13 75/6 75/13<br>75/14 75/22 76/9<br>79/25 82/7 82/13<br>82/18 83/19 84/24<br>87/16 87/25 100/17<br>103/15 103/15 104/14<br>105/5 108/1 113/23<br>115/5 115/20 116/4<br>116/7 117/12 120/8<br>120/20 121/20 122/8<br>125/20 127/15 127/17<br>132/9 133/20 134/10<br>137/6 137/24 138/1<br>140/10 140/18 141/14<br>142/9 143/22 147/10<br>147/18 154/5 155/14<br>155/23 156/3 156/4<br>164/7 166/5 166/7<br>167/20 168/6 168/9<br>170/4 172/15 174/12<br>175/12 176/14 179/7<br>180/20 184/7 186/20<br>187/18 | <b>driving [1]</b> 113/11  | <b>draws [1]</b> 33/20   |
| <b>direction [7]</b> 1/14<br>1/22 68/18 91/16 93/8<br>149/20 150/23  | <b>dismissal [3]</b> 52/2<br>53/17 100/3   | <b>do [130]</b> 1/15 2/9<br>2/17 2/25 3/9 3/11<br>5/23 8/9 8/9 11/3<br>12/25 15/11 15/16<br>18/2 18/16 19/14<br>19/18 19/19 19/24<br>24/2 24/12 26/6 26/21<br>27/5 27/14 27/19 28/5<br>28/8 28/10 28/20<br>29/20 30/18 32/3<br>32/13 35/9 36/13 38/1<br>42/25 44/16 47/11<br>47/16 47/21 50/2<br>50/16 55/13 56/6<br>60/22 60/23 61/17<br>62/22 64/7 65/1 65/13<br>66/12 67/7 68/4 68/6<br>69/7 69/15 69/20<br>70/14 71/1 73/11<br>74/13 75/6 75/13<br>75/14 75/22 76/9<br>79/25 82/7 82/13<br>82/18 83/19 84/24<br>87/16 87/25 100/17<br>103/15 103/15 104/14<br>105/5 108/1 113/23<br>115/5 115/20 116/4<br>116/7 117/12 120/8<br>120/20 121/20 122/8<br>125/20 127/15 127/17<br>132/9 133/20 134/10<br>137/6 137/24 138/1<br>140/10 140/18 141/14<br>142/9 143/22 147/10<br>147/18 154/5 155/14<br>155/23 156/3 156/4<br>164/7 166/5 166/7<br>167/20 168/6 168/9<br>170/4 172/15 174/12<br>175/12 176/14 179/7<br>180/20 184/7 186/20<br>187/18 | <b>drive [2]</b> 5/13 5/13   | <b>drop [2]</b> 61/3 111/10  |
| <b>directly [27]</b> 14/9<br>20/21 21/8 35/13 43/7<br>45/19 50/20 51/6<br>53/13 53/23 54/8<br>65/21 66/14 66/20<br>66/21 66/25 70/7<br>75/14 75/16 75/24<br>76/2 76/7 77/23 79/3<br>85/16 86/6 97/20 | <b>dismissed [5]</b> 56/4<br>57/8 58/23 59/15 99/8   | <b>do [130]</b> 1/15 2/9<br>2/17 2/25 3/9 3/11<br>5/23 8/9 8/9 11/3<br>12/25 15/11 15/16<br>18/2 18/16 19/14<br>19/18 19/19 19/24<br>24/2 24/12 26/6 26/21<br>27/5 27/14 27/19 28/5<br>28/8 28/10 28/20<br>29/20 30/18 32/3<br>32/13 35/9 36/13 38/1<br>42/25 44/16 47/11<br>47/16 47/21 50/2<br>50/16 55/13 56/6<br>60/22 60/23 61/17<br>62/22 64/7 65/1 65/13<br>66/12 67/7 68/4 68/6<br>69/7 69/15 69/20<br>70/14 71/1 73/11<br>74/13 75/6 75/13<br>75/14 75/22 76/9<br>79/25 82/7 82/13<br>82/18 83/19 84/24<br>87/16 87/  |  |  |



|   |   |   |   |  |
|---|---|---|---|--|
| <b>E</b>  | 13/16   | 117/5 136/16  | 105/3   | 15/6 91/19   |
| <b>earlier... [5]</b> 155/6<br>156/14 165/4 171/25<br>177/7   | <b>emails [6]</b> 5/25 6/8<br>17/18 56/17 57/2<br>129/11  | <b>engagements [1]</b><br>72/3  | <b>event [7]</b> 18/25 74/20<br>178/15 179/2 179/7<br>179/13 179/19   | <b>excellent [3]</b> 107/4<br>124/23 150/11  |
| <b>early [3]</b> 109/24<br>109/25 148/3   | <b>embarrassed [4]</b><br>20/25 34/8 34/22<br>35/15   | <b>engaging [2]</b> 162/12<br>163/1   | <b>events [4]</b> 3/16<br>109/13 109/15 160/22  | <b>except [5]</b> 80/18<br>123/6 140/3 147/4<br>156/3  |
| <b>earth [2]</b> 170/2<br>182/21  | <b>embarrassing [1]</b><br>35/7   | <b>Engineering [1]</b><br>65/18   | <b>events.' [1]</b> 8/19  | <b>exceptional [1]</b><br>158/19   |
| <b>easy [2]</b> 169/7<br>177/25   | <b>embrace [1]</b> 149/16   | <b>enormous [1]</b> 120/19  | <b>eventually [1]</b> 93/10   | <b>exchange [1]</b> 74/8   |
| <b>echelons [1]</b> 184/23  | <b>emerging [2]</b> 81/22<br>95/15  | <b>enough [3]</b> 61/5<br>170/1 178/8   | <b>ever [4]</b> 19/2 101/21<br>111/13 176/11  | <b>exchanges [2]</b> 15/16<br>19/9   |
| <b>education [1]</b> 50/15  | <b>employed [32]</b> 39/3<br>39/7 39/9 39/13 39/17<br>40/12 41/10 45/20<br>50/20 51/2 51/6 53/14<br>53/23 54/8 65/21 66/3<br>66/14 66/20 66/21<br>67/1 75/14 77/24<br>89/22 94/1 97/20<br>97/25 98/1 98/7 102/2<br>102/4 110/1 110/22 | <b>enquiries [2]</b> 135/20<br>138/21   | <b>every [11]</b> 50/7 50/7<br>95/7 109/7 124/2<br>126/20 151/5 151/13<br>152/22 154/6 159/22   | <b>excluded [1]</b> 75/4   |
| <b>educational [1]</b> 50/7   | <b>employee [4]</b> 42/22<br>89/21 94/14 147/5  | <b>enquiry [1]</b> 25/21  | <b>everybody [2]</b> 93/4<br>187/18   | <b>exclusivity [1]</b> 75/1  |
| <b>effect [9]</b> 8/5 14/18<br>15/3 17/1 25/20 81/4<br>89/6 92/20 181/8   | <b>employee's [1]</b> 43/3  | <b>ensue [1]</b> 51/22  | <b>everyone [3]</b> 97/25<br>131/7 187/21   | <b>excuse [1]</b> 70/25  |
| <b>effective [6]</b> 46/20<br>49/9 50/13 76/6 81/11<br>81/18  | <b>employees [18]</b><br>40/13 43/11 53/18<br>60/15 60/25 61/6<br>61/15 64/24 66/9<br>66/15 69/16 84/19<br>90/3 96/1 99/6 101/22<br>102/6 102/11  | <b>ensure [8]</b> 20/24 34/7<br>34/21 38/4 88/23<br>103/21 129/17 132/6                     | <b>everything [3]</b> 96/19<br>98/1 133/13  | <b>executive [22]</b> 43/16<br>45/18 67/10 68/13<br>71/11 82/6 82/20<br>82/25 82/25 83/2 83/5<br>83/6 83/14 83/25<br>87/22 87/23 88/6<br>97/21 98/5 99/21<br>101/21 101/23 |
| <b>effectively [13]</b> 24/13<br>24/25 56/10 63/2 75/7<br>82/15 92/24 93/14<br>112/22 113/11 114/23<br>135/11 148/15  | <b>employer [12]</b> 50/15<br>66/3 69/4 69/5 70/5<br>75/15 75/17 79/4 81/9<br>91/13 91/17 92/21   | <b>enter [4]</b> 72/1 73/11<br>91/9 139/4   | <b>evidence [84]</b> 1/13<br>1/23 2/16 3/6 3/12<br>3/15 4/12 4/14 4/20<br>11/11 12/10 14/18<br>19/10 31/24 32/17<br>36/15 36/19 36/20<br>38/15 38/18 40/9<br>40/21 42/13 43/13<br>46/2 47/21 48/9 50/21<br>57/25 58/24 67/9<br>84/18 92/8 94/7 94/13<br>94/17 100/11 102/1<br>103/4 103/11 105/17<br>107/1 107/24 115/25<br>116/14 116/16 120/5<br>122/6 123/5 123/6<br>123/14 123/20 127/4<br>128/6 128/23 130/7<br>130/21 131/21 131/24<br>132/2 133/14 137/1<br>137/18 137/19 137/23<br>138/5 138/20 139/20<br>143/24 145/17 158/3<br>158/22 162/25 165/24<br>171/6 175/13 175/14<br>176/16 178/4 180/1<br>183/17 184/9 184/12<br>187/12 | <b>Executive/UKGI [1]</b><br>82/6  |
| <b>effort [1]</b> 153/1   | <b>employers [5]</b> 69/13<br>69/21 84/1 92/13<br>92/18   | <b>entirety [1]</b> 19/9  | <b>error [10]</b> 121/1<br>121/2 121/4 121/5<br>121/12 121/22 121/22<br>137/14 139/5 143/20   | <b>Executives [1]</b> 70/23  |
| <b>efforts [1]</b> 67/8   | <b>employment [4]</b><br>57/24 92/14 92/19<br>94/6  | <b>entitle [1]</b> 90/16  | <b>error' [2]</b> 121/4 121/7   | <b>exercise [1]</b> 147/8  |
| <b>either [18]</b> 35/11<br>47/18 47/19 52/23<br>63/24 99/7 99/10<br>115/2 125/7 125/24<br>128/20 134/11 134/12<br>139/23 160/13 176/15<br>176/17 179/1   | <b>enable [3]</b> 18/19 50/3<br>180/17  | <b>entry [1]</b> 121/5  | <b>errors [19]</b> 35/16<br>35/19 117/19 118/4<br>118/5 121/15 125/14<br>125/17 126/4 126/13<br>126/17 127/16 130/4<br>130/22 130/24 131/2<br>131/4 131/8 139/19  | <b>exhausted [1]</b> 80/19   |
| <b>elected [10]</b> 39/21<br>45/11 45/12 45/17<br>45/18 47/12 89/23<br>97/17 98/3 98/5  | <b>enabled [1]</b> 22/20  | <b>environment [1]</b><br>150/15  | <b>escalated [2]</b> 55/8<br>63/12  | <b>exhibited [2]</b> 117/6<br>143/3  |
| <b>Election [1]</b> 85/18   | <b>encourage [2]</b> 157/1<br>165/17  | <b>envisage [1]</b> 116/22  | <b>Ergo [1]</b> 157/9   | <b>exhibiting [2]</b> 24/14<br>24/22   |
| <b>electronic [1]</b> 128/6   | <b>encouragement [3]</b><br>80/15 108/22 167/12   | <b>equal [2]</b> 70/4 70/6  | <b>error [10]</b> 121/1<br>121/2 121/4 121/5<br>121/12 121/22 121/22<br>137/14 139/5 143/20   | <b>exhibits [1]</b> 24/20  |
| <b>elide [1]</b> 91/25  | <b>end [14]</b> 12/8 15/14<br>19/9 21/18 38/1 38/7<br>41/12 52/22 102/1<br>105/25 126/21 144/11<br>172/4 178/2  | <b>Ergo [1]</b> 157/9   | <b>error' [2]</b> 121/4 121/7   | <b>exist [1]</b> 69/15   |
| <b>else [12]</b> 2/1 23/7<br>24/7 31/20 73/17<br>122/22 132/2 136/21<br>140/25 147/6 147/23<br>171/3  | <b>ended [4]</b> 115/18<br>115/25 177/23 178/13   | <b>error [10]</b> 121/1<br>121/2 121/4 121/5<br>121/12 121/22 121/22<br>137/14 139/5 143/20 | <b>errors [19]</b> 35/16<br>35/19 117/19 118/4<br>118/5 121/15 125/14<br>125/17 126/4 126/13<br>126/17 127/16 130/4<br>130/22 130/24 131/2<br>131/4 131/8 139/19  | <b>existed [1]</b> 69/15   |
| <b>email [51]</b> 5/7 6/22<br>6/24 7/1 7/3 7/11 9/15<br>10/9 12/20 12/22<br>15/16 17/23 18/18<br>18/20 19/5 19/15 20/8<br>20/10 21/7 21/17<br>21/19 21/20 21/23<br>21/25 22/3 22/5 22/9<br>22/11 33/5 33/6 34/13<br>34/13 56/13 62/10<br>119/16 119/24 124/17<br>126/6 126/8 126/11<br>127/20 129/3 129/5<br>129/10 129/15 129/24<br>131/20 132/4 167/2<br>167/16 168/1 | <b>ends [1]</b> 55/23   | <b>error [10]</b> 121/1<br>121/2 121/4 121/5<br>121/12 121/22 121/22<br>137/14 139/5 143/20 | <b>errors [19]</b> 35/16<br>35/19 117/19 118/4<br>118/5 121/15 125/14<br>125/17 126/4 126/13<br>126/17 127/16 130/4<br>130/22 130/24 131/2<br>131/4 131/8 139/19  | <b>existing [1]</b> 148/25   |
| <b>emailed [1]</b> 12/17  | <b>engage [3]</b> 50/13<br>92/12 186/25   | <b>error' [2]</b> 121/4 121/7   | <b>escalated [2]</b> 55/8<br>63/12  | <b>expand [2]</b> 38/17<br>134/5   |
| <b>emailing [3]</b> 5/6 6/12  | <b>engaged [5]</b> 66/21<br>79/12 85/20 110/18<br>186/23  | <b>error [10]</b> 121/1<br>121/2 121/4 121/5<br>121/12 121/22 121/22<br>137/14 139/5 143/20 | <b>escalated [2]</b> 55/8<br>63/12  | <b>expect [6]</b> 45/2 55/7<br>99/4 100/1 126/13<br>172/22   |

|          |   |  |  |  |
|----------|---|--|--|--|
| <b>E</b> | 13/22 17/3 19/20<br>20/19 25/23 26/13<br>29/22 29/24 30/6<br>30/10 30/12 30/21<br>30/22 30/24 33/14<br>63/8 126/23<br><b>failure'</b> [1] 18/6<br><b>failure.'</b> [1] 8/7<br><b>failures</b> [21] 9/2 9/13<br>9/24 10/4 17/11 17/19<br>21/1 25/24 26/13<br>27/11 34/9 34/23<br>34/25 35/4 35/4 35/23<br>126/14 127/1 127/12<br>127/13 127/16<br><b>failures'</b> [2] 8/19<br>14/25<br><b>fair</b> [33] 4/8 42/14<br>42/19 50/19 51/9<br>51/13 52/6 55/1 58/18<br>59/23 61/1 62/21 68/4<br>70/4 72/22 72/23<br>80/24 81/15 81/16<br>86/19 87/7 87/25<br>88/23 98/12 98/16<br>100/1 100/6 100/14<br>111/22 124/6 128/9<br>156/2 169/15<br><b>fairly</b> [4] 31/23 54/19<br>94/23 159/17<br><b>faith</b> [1] 68/20<br><b>fall</b> [2] 52/1 77/21<br><b>falling</b> [2] 43/19<br>122/21<br><b>falls</b> [1] 74/2<br><b>false</b> [4] 126/18<br>161/8 161/17 161/19<br><b>familiar</b> [1] 124/1<br><b>families</b> [1] 109/4<br><b>famous</b> [1] 184/4<br><b>famously</b> [1] 186/7<br><b>far</b> [9] 54/10 99/13<br>126/21 129/20 129/24<br>133/13 137/19 171/16<br>182/15<br><b>fault</b> [7] 33/2 53/6<br>58/15 63/3 64/1 64/2<br>131/12<br><b>faults</b> [1] 32/17<br><b>favour</b> [1] 161/13<br><b>feasible</b> [2] 130/10<br>130/17<br><b>February</b> [4] 3/6 3/12<br>4/20 154/9<br><b>fed</b> [1] 101/16<br><b>Federation</b> [20]<br>65/15 65/25 66/7<br>68/17 68/20 70/1<br>70/13 72/3 72/12 73/7<br>73/24 74/11 77/17<br>79/2 81/7 85/6 90/12<br>95/10 186/23 187/2<br><b>fee</b> [4] 117/2 178/25<br>179/21 179/21 | <b>fee/success</b> [1]<br>178/25<br><b>feedback</b> [1] 178/7<br><b>feel</b> [7] 9/4 11/1 18/9<br>73/15 73/24 168/21<br>170/23<br><b>feeling</b> [3] 143/14<br>183/7 187/1<br><b>feelings</b> [1] 139/22<br><b>feels</b> [1] 170/13<br><b>fees</b> [1] 179/21<br><b>fell</b> [3] 51/15 51/16<br>66/2<br><b>felt</b> [5] 56/4 131/15<br>137/23 149/7 161/9<br><b>Fenny</b> [1] 186/7<br><b>few</b> [10] 84/4 112/25<br>120/2 135/11 136/10<br>146/10 159/24 172/10<br>185/14 185/18<br><b>field</b> [3] 29/13 105/16<br>139/19<br><b>figure</b> [2] 59/12<br>185/23<br><b>figures</b> [5] 110/8<br>131/14 172/6 174/9<br>176/16<br><b>file</b> [4] 21/3 167/4<br>167/5 171/17<br><b>filenote</b> [1] 167/7<br><b>files</b> [5] 5/9 154/2<br>154/18 159/19 159/22<br><b>filtered</b> [1] 54/25<br><b>final</b> [19] 12/2 29/2<br>35/11 57/3 58/3 68/11<br>80/10 80/12 86/21<br>102/9 122/12 130/9<br>157/4 157/14 157/18<br>157/22 160/7 176/12<br>183/15<br><b>finalised</b> [1] 31/6<br><b>finalising</b> [1] 35/10<br><b>finance</b> [2] 82/21<br>175/12<br><b>finances</b> [1] 186/18<br><b>financial</b> [8] 8/5 17/1<br>25/20 41/8 133/25<br>161/5 161/11 179/13<br><b>find</b> [14] 16/20 94/17<br>103/15 103/16 103/23<br>116/8 119/10 126/4<br>133/18 150/9 150/16<br>159/14 176/3 177/25<br><b>finding</b> [2] 135/10<br>169/6<br><b>findings</b> [2] 140/10<br>156/19<br><b>fine</b> [11] 2/20 36/24<br>84/8 89/8 100/7 106/2<br>106/13 145/25 177/3<br>181/12 185/19<br><b>finish</b> [1] 185/14<br><b>finished</b> [5] 45/8<br>136/2 136/7 165/12 | 177/22<br><b>finishing</b> [1] 140/14<br><b>firm</b> [8] 110/1 110/3<br>110/13 114/25 184/9<br>184/19 184/21 184/24<br><b>firms</b> [2] 108/11<br>178/12<br><b>first</b> [55] 8/25 22/21<br>23/5 23/14 23/16<br>24/12 38/19 67/8<br>67/20 74/7 75/22 77/2<br>79/9 84/24 85/8 88/19<br>90/5 96/18 107/11<br>107/14 109/22 110/18<br>111/17 111/20 112/18<br>112/22 112/23 113/19<br>117/19 117/25 119/21<br>120/13 121/12 122/8<br>127/4 127/8 127/10<br>141/15 142/6 142/8<br>142/15 142/17 149/15<br>153/8 160/2 162/19<br>164/20 164/20 164/21<br>167/4 169/5 178/3<br>185/5 186/5 187/5<br><b>firsthand</b> [2] 44/4<br>49/1<br><b>firstly</b> [8] 13/22 19/15<br>22/19 42/11 74/6<br>117/14 137/16 174/12<br><b>fit</b> [4] 8/17 73/5 156/9<br>159/20<br><b>five</b> [7] 6/6 45/24<br>61/7 62/13 135/11<br>174/19 182/1<br><b>Flat</b> [1] 182/21<br><b>flight</b> [1] 166/24<br><b>flow</b> [1] 156/11<br><b>flows</b> [1] 147/7<br><b>fluctuate</b> [1] 61/3<br><b>fluctuates</b> [1] 61/10<br><b>focus</b> [3] 116/10<br>150/21 182/3<br><b>follow</b> [1] 53/22<br><b>followed</b> [8] 60/6<br>74/9 164/5 164/16<br>164/18 165/1 174/16<br>181/10<br><b>following</b> [13] 5/17<br>41/4 74/11 81/1<br>100/10 127/19 137/13<br>140/9 140/10 153/15<br>160/10 175/19 187/25<br><b>follows</b> [1] 77/1<br><b>foot</b> [1] 21/24<br><b>force</b> [1] 180/4<br><b>forcibly</b> [1] 87/2<br><b>forensic</b> [8] 109/20<br>109/22 110/15 110/23<br>114/25 115/10 116/25<br>131/22<br><b>forget</b> [2] 110/25<br>142/14<br><b>forgive</b> [4] 48/7 53/18 | 81/3 88/13<br><b>form</b> [3] 2/4 82/22<br>180/4<br><b>formal</b> [2] 45/23 46/2<br><b>formally</b> [1] 75/9<br><b>format</b> [3] 22/9 22/14<br>25/1<br><b>formats</b> [1] 47/13<br><b>formatting</b> [1] 23/10<br><b>formed</b> [2] 82/7<br>113/21<br><b>former</b> [4] 87/10<br>100/12 113/20 132/11<br><b>formerly</b> [2] 102/17<br>184/22<br><b>Forte</b> [1] 110/11<br><b>forth</b> [2] 62/22 93/12<br><b>fortunate</b> [1] 178/8<br><b>forward</b> [14] 4/23<br>10/20 82/13 114/9<br>114/11 122/24 134/11<br>140/13 141/11 165/20<br>174/22 177/12 180/8<br>180/24<br><b>forwarded</b> [1] 15/24<br><b>forwarding</b> [2] 6/24<br>22/2<br><b>forwards</b> [2] 21/7<br>170/22<br><b>foul</b> [4] 43/19 51/16<br>51/16 52/1<br><b>found</b> [12] 44/6 50/4<br>103/25 111/12 125/14<br>125/17 130/24 132/18<br>137/12 137/13 137/19<br>137/19<br><b>four</b> [3] 135/11<br>135/15 179/4<br><b>fourth</b> [2] 156/17<br>168/16<br><b>framework</b> [2] 43/25<br>72/6<br><b>frankly</b> [2] 127/22<br>165/13<br><b>Fraser</b> [4] 90/10<br>90/10 181/19 182/10<br><b>Fraser J</b> [1] 182/10<br><b>fraud</b> [2] 110/2 110/4<br><b>free</b> [1] 186/20<br><b>freedom</b> [2] 79/17<br>123/25<br><b>Freeths</b> [3] 108/10<br>178/13 181/14<br><b>Frequently</b> [1]<br>144/17<br><b>friend</b> [3] 59/10<br>59/20 186/12<br><b>friend/witness</b> [1]<br>59/10<br><b>front</b> [3] 37/17 107/4<br>154/9<br><b>frontline</b> [1] 76/17<br><b>frustration</b> [2]<br>139/20 183/11 |
| <b>F</b> | <b>face</b> [6] 86/9 161/10<br>161/11 167/12 168/12<br>168/12<br><b>faced</b> [1] 123/19<br><b>faces</b> [1] 98/2<br><b>facility</b> [2] 2/17 42/18<br><b>facing</b> [2] 44/21<br>103/18<br><b>fact</b> [14] 11/15 27/5<br>30/15 54/10 59/17<br>64/4 75/8 105/8<br>137/18 138/23 146/22<br>171/12 181/7 183/4<br><b>facts</b> [3] 107/21<br>111/23 127/14<br><b>failed</b> [1] 172/5<br><b>failings</b> [1] 87/18<br><b>failure</b> [22] 9/12 9/21<br>10/8 10/15 13/20  | <b>fees</b> [1] 179/21<br><b>fell</b> [3] 51/15 51/16<br>66/2<br><b>felt</b> [5] 56/4 131/15<br>137/23 149/7 161/9<br><b>Fenny</b> [1] 186/7<br><b>few</b> [10] 84/4 112/25<br>120/2 135/11 136/10<br>146/10 159/24 172/10<br>185/14 185/18<br><b>field</b> [3] 29/13 105/16<br>139/19<br><b>figure</b> [2] 59/12<br>185/23<br><b>figures</b> [5] 110/8<br>131/14 172/6 174/9<br>176/16<br><b>file</b> [4] 21/3 167/4<br>167/5 171/17<br><b>filenote</b> [1] 167/7<br><b>files</b> [5] 5/9 154/2<br>154/18 159/19 159/22<br><b>filtered</b> [1] 54/25<br><b>final</b> [19] 12/2 29/2<br>35/11 57/3 58/3 68/11<br>80/10 80/12 86/21<br>102/9 122/12 130/9<br>157/4 157/14 157/18<br>157/22 160/7 176/12<br>183/15<br><b>finalised</b> [1] 31/6<br><b>finalising</b> [1] 35/10<br><b>finance</b> [2] 82/21<br>175/12<br><b>finances</b> [1] 186/18<br><b>financial</b> [8] 8/5 17/1<br>25/20 41/8 133/25<br>161/5 161/11 179/13<br><b>find</b> [14] 16/20 94/17<br>103/15 103/16 103/23<br>116/8 119/10 126/4<br>133/18 150/9 150/16<br>159/14 176/3 177/25<br><b>finding</b> [2] 135/10<br>169/6<br><b>findings</b> [2] 140/10<br>156/19<br><b>fine</b> [11] 2/20 36/24<br>84/8 89/8 100/7 106/2<br>106/13 145/25 177/3<br>181/12 185/19<br><b>finish</b> [1] 185/14<br><b>finished</b> [5] 45/8<br>136/2 136/7 165/12  | 81/3 88/13<br><b>form</b> [3] 2/4 82/22<br>180/4<br><b>formal</b> [2] 45/23 46/2<br><b>formally</b> [1] 75/9<br><b>format</b> [3] 22/9 22/14<br>25/1<br><b>formats</b> [1] 47/13<br><b>formatting</b> [1] 23/10<br><b>formed</b> [2] 82/7<br>113/21<br><b>former</b> [4] 87/10<br>100/12 113/20 132/11<br><b>formerly</b> [2] 102/17<br>184/22<br><b>Forte</b> [1] 110/11<br><b>forth</b> [2] 62/22 93/12<br><b>fortunate</b> [1] 178/8<br><b>forward</b> [14] 4/23<br>10/20 82/13 114/9<br>114/11 122/24 134/11<br>140/13 141/11 165/20<br>174/22 177/12 180/8<br>180/24<br><b>forwarded</b> [1] 15/24<br><b>forwarding</b> [2] 6/24<br>22/2<br><b>forwards</b> [2] 21/7<br>170/22<br><b>foul</b> [4] 43/19 51/16<br>51/16 52/1<br><b>found</b> [12] 44/6 50/4<br>103/25 111/12 125/14<br>125/17 130/24 132/18<br>137/12 137/13 137/19<br>137/19<br><b>four</b> [3] 135/11<br>135/15 179/4<br><b>fourth</b> [2] 156/17<br>168/16<br><b>framework</b> [2] 43/25<br>72/6<br><b>frankly</b> [2] 127/22<br>165/13<br><b>Fraser</b> [4] 90/10<br>90/10 181/19 182/10<br><b>Fraser J</b> [1] 182/10<br><b>fraud</b> [2] 110/2 110/4<br><b>free</b> [1] 186/20<br><b>freedom</b> [2] 79/17<br>123/25<br><b>Freeths</b> [3] 108/10<br>178/13 181/14<br><b>Frequently</b> [1]<br>144/17<br><b>friend</b> [3] 59/10<br>59/20 186/12<br><b>friend/witness</b> [1]<br>59/10<br><b>front</b> [3] 37/17 107/4<br>154/9<br><b>frontline</b> [1] 76/17<br><b>frustration</b> [2]<br>139/20 183/11   |  |

|   |  |  |  |   |
|---|--|--|--|---|
| <b>F</b>  | 50/1 50/19 51/3 51/5<br>51/6 51/14 51/15<br>55/14 55/17 63/18<br><b>Gareth [13]</b> 3/8 4/4<br>6/24 19/12 19/17<br>20/21 21/7 128/13<br>139/14 139/15 144/3<br>145/11 145/16<br><b>Garr [1]</b> 182/9<br><b>gate [1]</b> 166/24<br><b>gathers [1]</b> 96/19<br><b>gave [20]</b> 1/13 1/13<br>1/22 1/23 3/6 3/12<br>3/15 4/20 19/10 21/13<br>32/8 40/9 40/20 43/13<br>58/24 116/13 142/13<br>174/15 176/16 183/17<br><b>general [24]</b> 3/15<br>11/9 39/18 40/1 48/23<br>49/4 49/7 49/8 58/9<br>58/16 61/19 68/19<br>70/18 70/21 71/1<br>83/16 83/23 85/18<br>89/23 106/1 134/24<br>150/1 178/7 183/7<br><b>generality [1]</b> 96/17<br><b>generally [17]</b> 13/3<br>13/5 57/7 58/19 58/20<br>58/21 70/17 71/7<br>94/19 103/23 113/1<br>125/16 134/23 140/11<br>144/12 169/18 171/12<br><b>generated [6]</b> 8/4<br>9/11 9/20 16/24 25/8<br>30/10<br><b>generic [1]</b> 8/11<br><b>generous [1]</b> 178/23<br><b>gentle [1]</b> 5/4<br><b>genuine [1]</b> 162/3<br><b>genuinely [2]</b> 16/20<br>31/21<br><b>George [1]</b> 70/19<br><b>Germany [1]</b> 166/22<br><b>get [31]</b> 20/24 32/1<br>32/24 34/7 34/16<br>34/16 36/22 44/1<br>44/20 50/8 61/21<br>73/15 73/24 101/16<br>111/19 113/4 123/21<br>123/25 125/21 132/24<br>133/2 141/10 141/20<br>157/19 168/17 170/20<br>172/8 177/11 179/25<br>180/9 186/19<br><b>getting [4]</b> 14/11<br>123/6 168/21 169/3<br><b>GIJ01 [1]</b> 24/20<br><b>GIJ02 [1]</b> 24/20<br><b>GIJ03 [1]</b> 24/20<br><b>gist [1]</b> 44/13<br><b>give [6]</b> 36/19 37/14<br>93/2 107/1 109/7<br>135/8<br><b>given [25]</b> 19/22 | 26/11 45/19 51/17<br>51/20 64/6 67/9 71/24<br>74/17 76/9 87/15 88/3<br>88/23 94/13 94/17<br>96/13 96/25 99/10<br>130/22 134/3 142/4<br>143/4 150/15 165/24<br>185/24<br><b>gives [1]</b> 8/8<br><b>giving [10]</b> 2/16<br>14/17 103/11 122/6<br>133/6 133/24 134/13<br>135/19 143/8 187/11<br><b>GLO [2]</b> 178/21<br>180/19<br><b>go [76]</b> 4/23 6/11<br>6/21 7/21 10/11 10/20<br>16/1 16/7 24/11 25/3<br>35/12 50/17 53/11<br>53/12 55/17 63/11<br>69/8 69/10 73/16<br>73/22 74/18 75/15<br>76/7 78/16 86/14<br>88/19 89/16 97/5<br>97/20 99/15 101/12<br>101/14 107/8 111/15<br>112/6 114/2 117/13<br>119/16 121/25 129/5<br>129/16 132/19 133/4<br>134/16 138/17 140/13<br>146/12 154/7 154/9<br>154/14 156/9 156/16<br>157/10 157/17 159/11<br>159/23 160/2 160/3<br>161/10 161/21 162/22<br>163/5 166/18 167/15<br>168/15 170/11 171/20<br>171/23 172/14 173/2<br>173/22 174/24 177/3<br>180/24 181/21 185/18<br><b>goes [11]</b> 78/4 78/7<br>79/5 79/15 80/8 85/24<br>86/11 126/25 126/25<br>130/9 137/4<br><b>going [46]</b> 4/10 8/23<br>29/18 30/13 31/19<br>44/7 62/19 62/20<br>68/19 68/22 68/23<br>81/14 89/1 91/17<br>92/20 106/19 107/25<br>109/15 109/17 112/18<br>112/21 115/22 115/22<br>115/23 117/3 125/4<br>128/16 144/15 148/5<br>151/21 153/8 158/13<br>158/18 159/20 161/18<br>162/13 164/11 166/8<br>168/15 170/14 173/8<br>174/22 177/16 180/11<br>184/8 185/13<br><b>gone [11]</b> 1/18 15/3<br>56/18 59/4 116/8<br>141/11 151/9 172/1<br>172/7 172/25 176/4 | <b>good [13]</b> 1/3 3/4 3/5<br>5/3 14/10 37/6 73/20<br>84/14 95/5 106/17<br>108/4 143/2 145/23<br><b>goods [1]</b> 171/4<br><b>got [27]</b> 6/18 12/23<br>21/20 25/3 30/20<br>31/19 37/18 38/3 45/4<br>45/5 62/11 64/21<br>73/21 74/2 90/5 93/18<br>101/25 108/20 112/2<br>134/6 150/10 152/20<br>152/20 163/3 166/7<br>170/24 171/7<br><b>Government [6]</b> 82/5<br>87/17 132/11 183/16<br>183/19 183/20<br><b>grades [1]</b> 57/5<br><b>Graham [6]</b> 1/7 1/10<br>7/2 8/18 24/6 188/2<br><b>grant [3]</b> 72/6 79/6<br>92/7<br><b>grants [1]</b> 78/19<br><b>grateful [4]</b> 7/7 89/19<br>94/12 106/8<br><b>great [2]</b> 133/9<br>159/14<br><b>greater [5]</b> 10/14<br>29/21 30/20 32/5<br>169/22<br><b>gross [1]</b> 78/20<br><b>ground [2]</b> 2/10 71/3<br><b>group [63]</b> 40/10<br>40/15 45/16 73/19<br>88/1 113/18 123/15<br>141/14 141/17 146/16<br>147/3 147/14 148/8<br>148/12 148/15 148/24<br>149/5 149/12 149/21<br>149/25 150/13 151/13<br>152/2 152/8 152/15<br>153/7 155/18 155/21<br>156/1 157/4 157/9<br>157/14 157/22 158/8<br>158/13 158/16 158/22<br>159/2 160/6 160/13<br>161/23 161/24 162/7<br>162/10 162/13 163/23<br>164/2 164/10 164/22<br>165/3 165/6 165/14<br>166/11 173/1 176/13<br>178/1 178/10 180/3<br>180/5 180/5 181/18<br>183/3 183/8<br><b>Group's [2]</b> 150/2<br>157/20<br><b>groups [5]</b> 66/19<br>69/20 98/3 102/6<br>102/8<br><b>guard [1]</b> 162/25<br><b>guess [1]</b> 167/22<br><b>guessing [1]</b> 8/25<br><b>guidance [1]</b> 108/22<br><b>guilt [1]</b> 57/22 | <b>guilty [7]</b> 58/22<br>103/17 103/21 133/16<br>171/12 171/13 171/15 |
| <b>G</b>  |  | <b>H</b>   |  |   |
| <b>gain [2]</b> 43/6 47/19<br><b>gains [22]</b> 42/7 42/9<br>42/24 43/17 44/7 47/5<br>47/9 47/13 47/20<br>47/23 47/25 49/24 |  | <b>had [182]</b> 5/2 6/8<br>7/10 7/24 9/7 11/10<br>13/3 15/12 19/16<br>19/21 19/25 20/2 21/8<br>26/11 28/9 28/17<br>28/24 30/18 35/15<br>39/24 40/5 40/15<br>41/15 41/17 41/22<br>42/6 43/1 43/25 44/25<br>45/2 49/13 49/18<br>50/15 52/20 54/15<br>54/25 56/11 57/25<br>62/1 62/16 62/17 65/2<br>66/18 68/2 68/16 71/1<br>72/11 72/24 73/20<br>74/14 79/2 80/3 81/13<br>82/13 87/13 88/3<br>88/16 93/2 95/12 99/6<br>103/11 103/24 104/24<br>112/12 112/23 112/23<br>113/24 113/25 113/25<br>114/6 115/1 115/1<br>115/9 116/8 116/9<br>118/25 119/3 120/9<br>120/12 123/1 123/3<br>123/24 124/12 125/12<br>125/19 125/22 125/24<br>126/4 127/21 128/10<br>128/13 128/14 129/23<br>130/3 130/3 130/5<br>130/7 130/19 131/5<br>131/13 131/14 132/12<br>132/18 132/19 132/25<br>133/25 134/4 137/13<br>137/17 137/22 137/23<br>138/14 140/4 141/11<br>142/6 142/16 143/19<br>144/8 144/9 145/12<br>145/16 146/19 150/1<br>150/3 150/9 150/12<br>150/18 152/13 155/4<br>155/22 156/3 156/10<br>158/17 158/25 159/17<br>159/21 160/7 160/13<br>160/18 161/12 161/17<br>162/15 163/11 164/3<br>164/13 164/18 166/3<br>166/20 167/13 168/4<br>169/6 169/22 170/13<br>170/18 170/18 170/18<br>170/19 170/22 171/6<br>171/8 172/25 173/4<br>173/25 175/7 175/9<br>176/2 176/15 177/22<br>177/23 178/3 178/4<br>178/6 178/7 178/10<br>178/20 178/23 179/3<br>181/8 182/16 183/14<br>183/18 186/18   |  |   |

|          |   |   |  |   |
|----------|---|---|--|---|
| <b>H</b> | 170/2 172/1 175/13<br>176/18 179/11 180/2<br>180/25 185/8 | <b>hearings [1]</b> 59/5<br><b>heat [1]</b> 65/19<br><b>held [10]</b> 3/20 11/14<br>46/14 47/15 56/9 70/4<br>128/5 165/9 173/3<br>182/12<br><b>help [7]</b> 8/17 26/19<br>31/21 56/12 91/1<br>108/6 109/3<br><b>helped [1]</b> 52/18<br><b>helpful [1]</b> 14/6<br><b>helping [2]</b> 56/6<br>186/17<br><b>Hence [1]</b> 13/6<br><b>Henderson [15]</b><br>112/19 114/4 115/2<br>124/17 125/7 125/25<br>138/7 139/23 141/2<br>150/12 175/18 175/21<br>176/5 176/15 178/15<br><b>her [31]</b> 108/18 109/1<br>111/11 111/13 130/20<br>134/7 142/16 142/16<br>142/17 142/18 142/19<br>142/20 142/22 147/10<br>150/10 150/12 150/18<br>167/10 167/11 167/12<br>167/19 169/8 169/9<br>170/11 170/13 170/24<br>171/2 171/3 171/4<br>171/4 185/15<br><b>here [21]</b> 14/7 17/7<br>20/5 21/16 22/20 23/4<br>26/3 47/2 57/9 62/11<br>68/6 69/10 72/13<br>95/11 120/25 130/16<br>153/7 155/12 171/24<br>172/18 173/12<br><b>heroes [1]</b> 108/8<br><b>hidden [1]</b> 187/8<br><b>hierarchy [5]</b> 83/16<br>83/17 113/3 113/9<br>113/14<br><b>high [5]</b> 90/8 108/10<br>146/21 180/5 184/23<br><b>highlighted [2]</b> 11/17<br>176/2<br><b>highly [1]</b> 90/15<br><b>HILARY [3]</b> 106/22<br>106/25 188/14<br><b>him [23]</b> 1/25 7/20<br>14/5 14/9 14/24 24/14<br>24/22 26/19 28/9 29/8<br>31/21 45/15 46/6<br>112/13 112/14 112/16<br>112/24 142/7 142/8<br>149/25 159/7 165/19<br>185/24<br><b>hindrance [3]</b> 76/3<br>76/5 76/6<br><b>hindsight [1]</b> 147/18<br><b>his [26]</b> 10/7 14/5<br>14/12 14/23 35/21<br>45/19 86/6 87/3 94/3 | 97/5 116/16 142/9<br>145/12 145/17 149/20<br>150/1 151/11 158/3<br>159/7 161/25 162/10<br>173/9 181/19 182/17<br>183/24 185/22<br><b>historic [2]</b> 117/20<br>118/1<br><b>historically [1]</b> 64/21<br><b>HMRC [2]</b> 110/8<br>131/23<br><b>HMRC/Inland [1]</b><br>131/23<br><b>HODGE [8]</b> 37/12<br>37/13 92/1 92/15<br>93/17 100/12 105/22<br>188/8<br><b>hold [1]</b> 120/1<br><b>home [2]</b> 130/12<br>171/2<br><b>homes [1]</b> 169/23<br><b>honest [1]</b> 143/14<br><b>Honestly [1]</b> 19/6<br><b>Hooper [10]</b> 151/6<br>151/14 153/10 153/14<br>159/2 159/5 159/6<br>159/10 163/11 172/2<br><b>hopefully [1]</b> 160/1<br><b>horizon [83]</b> 13/2<br>13/5 15/9 29/7 31/22<br>32/17 33/2 34/4 34/17<br>34/18 35/15 35/19<br>40/10 40/15 40/17<br>41/5 41/15 41/19<br>41/20 42/10 45/16<br>46/15 47/3 47/7 47/8<br>48/12 48/16 52/16<br>52/23 53/15 53/24<br>54/5 54/10 56/25 58/7<br>59/3 60/16 60/21<br>60/25 64/1 64/7 82/4<br>84/20 85/8 85/9 85/15<br>85/21 86/13 86/18<br>87/7 87/18 88/2 95/14<br>96/21 96/24 98/15<br>99/9 100/4 100/18<br>100/25 101/2 101/22<br>113/7 115/12 119/25<br>120/5 121/9 121/19<br>121/21 123/2 123/15<br>125/9 125/17 127/12<br>127/14 130/7 133/1<br>137/3 149/21 152/5<br>152/12 183/1 183/20<br><b>Horizon' [1]</b> 149/2<br><b>hove [1]</b> 166/25<br><b>hover [5]</b> 22/24 23/4<br>23/20 25/10 25/25<br><b>hovered [2]</b> 23/13<br>23/18<br><b>hovering [1]</b> 23/16<br><b>how [62]</b> 6/2 6/3 7/16<br>7/17 8/16 15/1 15/5<br>19/4 27/17 27/19 28/4 | 35/9 36/8 42/7 42/12<br>43/9 44/21 45/5 45/6<br>45/6 48/24 48/25<br>50/12 50/13 50/14<br>51/14 54/3 57/12<br>59/18 63/15 63/17<br>80/2 81/22 93/16<br>96/12 96/22 97/10<br>101/13 104/4 104/16<br>113/16 113/17 113/20<br>113/23 115/15 116/22<br>125/18 130/22 138/10<br>140/12 140/17 142/22<br>150/22 153/10 157/1<br>158/12 163/23 169/8<br>173/17 177/25 186/10<br>186/20<br><b>Howe [1]</b> 108/9<br><b>however [8]</b> 20/7<br>86/3 86/14 86/15<br>144/24 157/4 158/8<br>182/23<br><b>Hudgells [1]</b> 108/11<br><b>huge [3]</b> 11/22 11/24<br>183/1<br><b>hundred [1]</b> 52/9<br><b>hundreds [2]</b> 95/12<br>95/13<br><b>hurdle [1]</b> 164/13<br><b>hurdles [1]</b> 180/5 |
|          |   | <b>I</b>  |  |   |
|          |   | <b>I accept [1]</b> 29/1<br><b>I agree [1]</b> 20/3<br><b>I also [3]</b> 5/16 98/22<br>137/12<br><b>I always [1]</b> 154/13<br><b>I am [8]</b> 15/18 17/16<br>27/5 72/9 92/20 94/16<br>131/23 133/17<br><b>I apologise [1]</b><br>187/15<br><b>I applied [1]</b> 110/4<br><b>I appreciate [2]</b><br>143/21 167/24<br><b>I ask [12]</b> 4/8 37/14<br>37/23 107/3 107/9<br>107/16 107/21 115/15<br>144/14 175/25 180/19<br>183/15<br><b>I asked [4]</b> 102/9<br>115/17 177/6 185/24<br><b>I assume [1]</b> 74/23<br><b>I assumed [1]</b> 128/5<br><b>I attended [1]</b> 141/22<br><b>I be [1]</b> 187/5<br><b>I became [1]</b> 111/6<br><b>I beg [1]</b> 136/5<br><b>I began [1]</b> 110/2<br><b>I believe [15]</b> 8/18<br>75/18 117/1 119/10<br>126/8 126/9 128/24<br>130/13 133/23 135/5<br>135/10 141/21 145/13   |  |   |

|  |  |  |   |   |
|--|--|--|---|---|
| <b>I</b>   | 142/14   | 149/18 171/16  | 120/16 121/12 121/13  | 17/5 17/14 17/21  |
| <b>I believe... [2]</b> 147/21<br>160/25   | <b>I found [1]</b> 103/25  | <b>I recap [1]</b> 3/14  | 122/10 126/15 129/1   | 18/11 30/14 30/23   |
| <b>I brought [1]</b> 175/20  | <b>I gave [4]</b> 1/13 1/22<br>21/13 43/13   | <b>I refer' [1]</b> 10/24  | 129/2 129/11 129/12   | 41/3 62/4 62/6 62/11  |
| <b>I can [30]</b> 1/6 9/17<br>10/19 14/7 15/5 21/22<br>22/1 22/23 23/3 26/15<br>26/25 27/8 27/17<br>27/23 28/3 30/22<br>31/20 32/12 33/23<br>35/9 36/4 36/8 36/9<br>94/17 101/24 106/18<br>133/13 146/9 165/4<br>183/10  | <b>I give [1]</b> 93/2   | <b>I referenced [1]</b><br>72/23   | 135/7 135/25 136/10<br>139/7 139/11 141/18<br>142/8 143/2 143/18  | 71/16 93/16 97/21<br>108/12 116/24 125/6<br>172/19 172/22   |
| <b>I can't [10]</b> 18/11<br>26/9 30/14 119/10<br>131/5 133/18 138/1<br>155/10 167/21 174/15   | <b>I go [1]</b> 107/8  | <b>I referred [1]</b> 62/9   | 143/21 143/24 153/24  | <b>I wouldn't [4]</b> 17/16<br>18/5 32/22 104/1   |
| <b>I certainly [1]</b> 183/5   | <b>I got [1]</b> 112/2   | <b>I remember [3]</b> 57/23<br>167/10 174/14   | 158/2 159/5 160/16<br>161/2 162/19 166/20<br>168/16 174/21 182/9<br>182/13 182/22 183/11<br>183/25 185/4 185/5<br>185/8 | <b>I'd [16]</b> 7/7 34/19<br>40/8 45/2 46/11 65/7<br>81/21 108/4 108/15<br>117/2 119/2 124/15<br>132/4 138/6 171/21<br>187/18   |
| <b>I challenged [1]</b><br>115/12  | <b>I had [8]</b> 5/2 88/3<br>112/23 119/3 128/14<br>130/19 176/2 177/23  | <b>I represent [1]</b> 90/2  | <b>I thought [5]</b> 116/24<br>135/19 140/14 171/1<br>182/24  | <b>I'll [8]</b> 1/13 5/4 7/8<br>28/16 90/8 128/1<br>142/19 144/13   |
| <b>I could [5]</b> 48/2 88/4<br>176/3 182/15 182/23  | <b>I have [17]</b> 2/19<br>24/18 35/3 37/19<br>58/13 73/23 84/4 95/9<br>108/8 124/22 127/8<br>130/10 131/22 133/23<br>143/14 168/9 185/1           | <b>I right [1]</b> 176/14  | <b>I understand [12]</b> 3/1<br>44/12 64/25 73/8<br>77/10 93/4 96/5 97/7<br>99/3 107/12 108/2<br>179/17                 | <b>I'm [73]</b> 4/13 8/24<br>14/4 14/4 18/4 18/21<br>26/5 27/16 28/13<br>28/15 29/18 31/5<br>31/18 32/2 32/12<br>32/22 32/23 33/25<br>35/11 36/8 47/4 54/10<br>58/13 58/15 62/13<br>62/14 63/25 68/15<br>71/7 72/9 74/23 88/5<br>89/19 90/8 94/12 95/6<br>96/12 97/7 98/19<br>101/16 101/18 104/21<br>106/8 107/25 109/16<br>112/21 124/14 124/14<br>127/22 128/7 134/5<br>138/3 139/15 140/19<br>143/17 144/15 147/5<br>148/5 151/21 153/8<br>161/16 168/15 170/10<br>170/14 176/22 177/16<br>177/17 182/23 182/24<br>184/19 185/12 185/14<br>187/17 |
| <b>I couldn't [3]</b> 43/5<br>88/4 176/19  | <b>I haven't [1]</b> 31/19   | <b>I saw [2]</b> 118/11<br>167/19  | <b>I use [1]</b> 127/23   | <b>I used [2]</b> 55/21 83/1  |
| <b>I dealt [1]</b> 57/18   | <b>I highlighted [1]</b><br>176/2  | <b>I say [10]</b> 14/7 30/13<br>58/20 69/7 72/9 72/16<br>97/3 117/12 127/11<br>173/22  | <b>I want [13]</b> 3/6 20/5<br>34/16 53/16 126/14<br>140/6 143/11 146/10<br>159/24 166/10 171/20<br>176/12 182/3        | <b>I wanted [3]</b> 34/25<br>115/21 132/17  |
| <b>I decided [1]</b> 183/22  | <b>I just [18]</b> 8/21 14/11<br>14/12 15/11 17/15<br>17/20 18/21 19/6<br>32/11 32/13 33/18<br>103/6 111/17 112/25<br>138/4 147/9 172/10<br>184/20 | <b>I set [2]</b> 110/9 110/16  | <b>I used [2]</b> 55/21 83/1  | <b>I was [58]</b> 3/19 10/3<br>13/25 14/6 14/24<br>17/20 24/17 26/3 26/6<br>26/19 31/20 31/25<br>32/3 35/18 41/2 46/9<br>47/11 47/12 51/2<br>55/20 57/16 68/11<br>68/14 71/6 71/14 83/8<br>96/10 96/10 96/11<br>103/13 110/2 110/14<br>110/21 110/23 112/3<br>114/8 115/8 115/10<br>125/4 125/20 126/10<br>128/16 131/23 132/1<br>136/6 137/8 137/15<br>139/4 140/1 140/24<br>146/19 159/7 166/24<br>174/21 175/17 175/20<br>182/6 183/24   |
| <b>I definitely [1]</b> 119/5  | <b>I knew [1]</b> 159/7  | <b>I shall [1]</b> 38/16   | <b>I will [4]</b> 2/12 2/22<br>109/14 185/6   | <b>I wasn't [10]</b> 14/7<br>15/11 58/19 72/15<br>91/5 115/4 145/18<br>145/22 147/10 184/23   |
| <b>I did [7]</b> 66/11 82/2<br>111/19 168/8 169/13<br>170/23 178/2   | <b>I know [7]</b> 15/17 27/4<br>77/10 101/16 170/14<br>172/25 174/17   | <b>I should [3]</b> 118/16<br>129/25 140/19  | <b>I would [22]</b> 10/10<br>12/21 12/21 12/24  | <b>I've [50]</b> 12/14 13/18<br>13/24 18/4 19/3 20/17<br>25/3 26/2 26/15 26/25<br>28/2 28/25 29/1 31/2<br>31/2 31/3 31/19 33/10<br>33/18 35/10 36/2 38/3<br>45/4 45/5 48/23 49/11<br>54/20 58/23 59/24<br>62/9 62/18 62/23<br>76/15 83/11 88/9<br>89/10 90/5 91/6 93/18<br>97/15 98/22 99/15<br>101/25 103/11 103/24<br>110/11 120/25 139/8<br>173/9 173/15   |
| <b>I didn't [12]</b> 30/25<br>34/17 35/25 36/2<br>49/16 82/18 98/21<br>122/11 133/16 137/9<br>147/4 170/23   | <b>I looked [1]</b> 144/16   | <b>I shouldn't [1]</b> 29/1  | <b>I work [2]</b> 55/11<br>55/12  | <b>Ian [13]</b> 112/19 114/3<br>115/2 124/17 125/5<br>138/7 141/1 150/11<br>173/1 175/8 175/18<br>175/21 176/4  |
| <b>I do [13]</b> 3/11 19/18<br>28/10 35/9 103/15<br>103/15 108/1 117/12<br>120/20 127/17 168/9<br>184/7 187/18   | <b>I look [1]</b> 144/16   | <b>I showed [1]</b> 20/7   | <b>I worked [3]</b> 57/15<br>57/16 57/17  | <b>Ian's [1]</b> 121/14   |
| <b>I don't [45]</b> 10/3<br>12/12 17/8 27/16<br>28/24 31/12 31/18<br>33/4 35/10 38/23<br>48/21 49/1 49/16<br>69/19 69/23 70/15<br>71/6 74/16 76/13<br>76/15 83/6 84/25 88/6<br>98/16 98/21 103/23<br>105/24 113/13 113/22<br>119/2 119/5 126/12<br>135/25 137/10 138/2<br>138/7 138/17 140/3<br>152/17 165/2 165/19<br>171/6 171/15 173/10<br>176/22 | <b>I made [3]</b> 43/12 58/1<br>64/20  | <b>I sit [1]</b> 82/20   | <b>I would [22]</b> 10/10<br>12/21 12/21 12/24  | <b>idea [13]</b> 14/10 34/19<br>43/23 43/24 55/24   |
| <b>I expected [1]</b> 135/13   | <b>I make [1]</b> 54/7   | <b>I slightly [1]</b> 108/18   |   |   |
| <b>I explained [2]</b> 47/17<br>63/4   | <b>I may [4]</b> 89/14 144/2<br>161/1 184/5  | <b>I speak [1]</b> 95/8  |   |   |
| <b>I first [1]</b> 127/8   | <b>I mean [13]</b> 26/2<br>31/12 31/19 72/23<br>87/13 89/4 96/9 97/7<br>97/15 152/17 155/14<br>159/17 165/9  | <b>I spoke [1]</b> 187/1   |   |   |
| <b>I for [1]</b> 129/20  | <b>I met [3]</b> 112/17<br>113/12 184/18   | <b>I start [2]</b> 108/4 111/1   |   |   |
| <b>I forget [2]</b> 110/25   | <b>I move [1]</b> 128/15   | <b>I still [1]</b> 140/5   |   |   |
|  | <b>I must [1]</b> 18/4   | <b>I suggest [2]</b> 8/1<br>32/15  |   |   |
|  | <b>I need [1]</b> 89/12  | <b>I suspect [1]</b> 77/15   |   |   |
|  | <b>I now [1]</b> 24/19   | <b>I take [4]</b> 34/15 82/17<br>83/9 121/20   |   |   |
|  | <b>I only [1]</b> 103/10   | <b>I then [3]</b> 21/12 91/25<br>110/8   |   |   |
|  | <b>I outline [1]</b> 42/6  | <b>I therefore [1]</b> 131/15  |   |   |
|  | <b>I overcut [1]</b> 136/6   | <b>I think [107]</b> 1/19<br>3/19 4/8 7/24 11/16<br>13/20 13/25 15/19<br>18/16 20/18 22/14<br>22/19 23/15 28/24<br>29/5 31/3 31/24 33/13<br>34/15 36/22 41/14<br>41/24 42/6 42/13<br>43/12 44/12 49/12<br>50/22 51/5 52/3 54/23<br>56/21 58/1 59/3 60/22<br>61/25 61/25 64/19<br>67/11 70/17 70/18<br>70/19 70/21 72/23<br>75/11 76/15 80/2 84/3<br>84/5 88/20 94/8 95/10<br>95/16 96/12 96/18<br>97/15 100/14 101/25<br>102/3 102/12 105/25<br>106/10 110/22 112/9<br>114/2 114/13 116/6<br>118/22 119/3 120/13 |   |   |
|  | <b>I paid [1]</b> 186/21   | <b>I would [22]</b> 10/10<br>12/21 12/21 12/24   |   |   |
|  | <b>I please [1]</b> 119/15   |  |   |   |
|  | <b>I prepared [1]</b> 117/1  |  |   |   |
|  | <b>I probably [1]</b> 171/7  |  |   |   |
|  | <b>I put [3]</b> 4/13 15/12<br>128/16  |  |   |   |
|  | <b>I really [10]</b> 14/23<br>15/13 19/7 26/9 27/18<br>31/18 32/3 32/11 36/8<br>184/17   |  |   |   |
|  | <b>I recall [7]</b> 1/7 1/17<br>115/17 130/3 134/6   |  |   |   |

|   |   |   |  |  |
|---|---|---|--|--|
| <b>I</b>  | <b>includes [3]</b> 77/16<br>94/4 98/7  | 98/7 110/11   | 136/20   | 63/18 94/18  |
| <b>idea... [8]</b> 63/5<br>119/25 124/23 133/15<br>135/17 135/18 141/16<br>173/9                  | <b>including [7]</b> 9/20<br>46/5 50/18 72/12<br>90/19 122/5 154/3  | <b>inevitable [1]</b> 78/10<br><b>infer [1]</b> 143/7   | <b>insubordination [1]</b><br>63/8                     | <b>interviewing [2]</b><br>105/11 171/3  |
| <b>identical [2]</b> 1/21<br>176/17   | <b>inclusion [2]</b> 11/8<br>152/11   | <b>inference [1]</b> 68/6<br><b>inflicted [1]</b> 109/4<br><b>info [1]</b> 7/25<br><b>inform [2]</b> 160/5<br>163/9   | <b>insufficient [1]</b><br>158/10                      | <b>intimidating [1]</b> 123/13<br><b>intimidating [1]</b><br>103/5   |
| <b>identifies [4]</b> 29/13<br>67/20 67/25 79/9   | <b>inclusive [1]</b> 82/3   | <b>information [45]</b> 9/19<br>11/14 16/5 24/17 28/5<br>28/21 29/23 30/16<br>30/19 30/21 33/1<br>35/22 41/25 49/14<br>54/24 56/24 80/13<br>99/7 99/9 99/10 99/14<br>113/22 122/21 123/3<br>123/20 123/22 123/25<br>124/5 124/6 124/9<br>125/21 138/22 145/2<br>145/7 158/6 158/10<br>158/17 171/8 172/8<br>174/8 174/16 175/8<br>177/12 177/19 180/7 | <b>insufficiently [1]</b><br>149/8                     | <b>into [30]</b> 7/8 14/5<br>24/21 45/13 45/14<br>66/2 68/24 72/1 73/11<br>91/9 91/12 97/9<br>110/12 111/10 117/19<br>119/25 138/25 145/20<br>164/10 166/6 166/21<br>166/25 168/3 170/11<br>171/2 174/5 174/10<br>175/16 180/11 184/18                       |
| <b>identify [6]</b> 10/2<br>42/20 43/2 43/5 63/2<br>72/13   | <b>incomplete [2]</b> 60/20<br>126/23   | <b>informed [1]</b> 41/2  | <b>insurers [1]</b> 178/15                             | <b>introduce [1]</b> 79/20<br><b>introduced [2]</b> 60/16<br>178/14  |
| <b>ie [5]</b> 12/19 13/13<br>15/4 25/21 30/5  | <b>incorrect [2]</b> 42/7<br>121/7  | <b>ingredients [1]</b><br>179/18  | <b>integrity [5]</b> 15/9<br>31/22 82/4 88/2<br>159/14 | <b>introduction [5]</b> 41/5<br>41/19 41/20 71/20<br>71/22   |
| <b>ie it [1]</b> 15/4   | <b>increase [1]</b> 60/24   | <b>initial [8]</b> 111/1<br>112/16 114/24 116/6<br>117/18 140/22 141/18<br>144/6  | <b>intend [1]</b> 38/23                                | <b>intrusion [1]</b> 164/10  |
| <b>ie the [3]</b> 12/19 13/13<br>30/5   | <b>increased [3]</b> 41/22<br>65/3 66/25  | <b>inland [3]</b> 110/5<br>110/5 131/23   | <b>intended [2]</b> 157/13<br>158/16                   | <b>invariably [1]</b> 57/5   |
| <b>if [211]</b>   | <b>increasing [2]</b> 96/20<br>111/13   | <b>innocence [2]</b> 103/17<br>108/19   | <b>intends [1]</b> 170/11                              | <b>investigate [3]</b> 47/24<br>85/21 117/20   |
| <b>ignorance [2]</b> 10/5<br>14/2   | <b>incriminate [3]</b> 1/15<br>2/2 2/10   | <b>informed [1]</b> 41/2  | <b>intend [1]</b> 38/23                                | <b>investigated [3]</b><br>52/12 53/1 102/17   |
| <b>image [2]</b> 21/17 22/3   | <b>incrimination [2]</b> 2/4<br>2/7   | <b>informed [1]</b> 41/2  | <b>intend [1]</b> 38/23                                | <b>investigating [4]</b><br>53/4 110/6 173/18<br>176/7   |
| <b>imaged [1]</b> 21/16   | <b>incurious [2]</b> 98/15<br>98/20   | <b>initial [8]</b> 111/1<br>112/16 114/24 116/6<br>117/18 140/22 141/18<br>144/6  | <b>intends [1]</b> 170/11                              | <b>investigation [30]</b><br>14/14 14/20 52/15<br>53/1 59/9 59/11 59/19<br>102/16 103/11 103/12<br>103/19 103/20 103/25<br>104/18 104/24 105/13<br>117/18 124/15 128/4<br>129/19 135/10 135/24<br>136/2 145/20 147/9<br>156/18 169/4 169/17<br>175/16 175/19 |
| <b>imagining [1]</b> 176/22   | <b>indeed [3]</b> 98/20<br>106/18 112/14  | <b>ink [2]</b> 124/4 127/23   | <b>intends [1]</b> 170/11                              | <b>investigations [2]</b><br>53/10 174/17  |
| <b>immediately [1]</b> 2/11   | <b>indefinitely [1]</b><br>182/13   | <b>Inland [3]</b> 110/5<br>110/5 131/23   | <b>intends [1]</b> 170/11                              | <b>Investigator [2]</b><br>14/13 14/19   |
| <b>impact [1]</b> 169/22  | <b>indemnify [1]</b> 179/8  | <b>innocence [2]</b> 103/17<br>108/19   | <b>intends [1]</b> 170/11                              | <b>investigators [6]</b><br>102/13 102/15 103/6<br>103/9 150/11 158/21   |
| <b>imperative [1]</b> 124/8   | <b>independence [6]</b><br>80/10 81/8 81/14<br>82/11 91/15 116/23   | <b>input [2]</b> 144/8 144/9  | <b>intends [1]</b> 170/11                              | <b>invited [1]</b> 124/24  |
| <b>implement [1]</b><br>136/18  | <b>independent [5]</b><br>90/13 90/22 114/25<br>115/9 116/25  | <b>INQ00001124 [1]</b><br>4/18  | <b>intends [1]</b> 170/11                              | <b>involve [1]</b> 4/10  |
| <b>implementation [2]</b><br>121/8 121/18   | <b>independently [1]</b><br>116/20  | <b>inquiries [1]</b> 158/17   | <b>intends [1]</b> 170/11                              | <b>involved [25]</b> 19/1<br>45/25 57/7 58/6 58/21<br>62/5 68/10 71/7 73/13<br>73/23 108/18 108/20<br>108/24 108/25 110/18<br>111/6 111/19 111/25<br>112/1 138/9 140/8<br>140/22 140/25 175/15<br>184/23   |
| <b>implemented [3]</b><br>41/16 47/7 60/22  | <b>indicate [2]</b> 67/13<br>147/11   | <b>inquiry [32]</b> 1/24 1/25<br>3/13 20/4 36/20 37/14<br>37/21 38/16 38/19<br>40/21 50/22 56/23<br>83/8 94/25 103/8<br>106/7 107/1 107/24<br>116/14 119/22 122/2<br>122/3 122/8 123/12<br>123/14 137/1 137/4<br>138/16 156/8 158/4<br>167/6 175/13   | <b>intends [1]</b> 170/11                              | <b>involvement [10]</b> 3/8<br>67/10 83/20 88/3<br>111/20 127/25 134/18<br>176/7 180/25 184/15   |
| <b>implication [1]</b><br>181/20  | <b>indicated [2]</b> 162/23<br>170/12   | <b>inquiry's [1]</b> 109/16   | <b>intends [1]</b> 170/11                              |  |
| <b>implications [2]</b><br>129/22 179/13  | <b>individual [23]</b> 41/11<br>47/15 47/16 49/2<br>49/15 49/17 50/13<br>52/22 53/8 56/1 56/16<br>58/1 58/2 59/7 59/13<br>59/16 63/17 86/3<br>105/2 105/6 105/12<br>155/13 161/17 | <b>insert [1]</b> 138/25  | <b>intends [1]</b> 170/11                              |  |
| <b>implies [3]</b> 10/15<br>29/22 30/20   | <b>individual's [1]</b> 59/20   | <b>insist [1]</b> 26/5  | <b>intends [1]</b> 170/11                              |  |
| <b>importance [2]</b> 15/8<br>179/2   | <b>individuals [14]</b> 41/3<br>51/16 54/15 57/19<br>59/6 63/21 64/22 68/7<br>91/24 93/15 98/3<br>105/8 105/15 181/2  | <b>insisted [1]</b> 182/10  | <b>intends [1]</b> 170/11                              |  |
| <b>important [12]</b> 4/12<br>7/13 9/18 9/22 11/12<br>15/14 19/1 20/24 34/7<br>34/15 130/4 168/20 | <b>indulgence [1]</b> 89/14   | <b>insisted [1]</b> 182/10  | <b>intends [1]</b> 170/11                              |  |
| <b>imposed [1]</b> 148/13   | <b>industrial [8]</b> 43/24<br>82/23 82/23 83/5<br>83/25 93/3 93/5 93/9   | <b>insisted [1]</b> 182/10  | <b>intends [1]</b> 170/11                              |  |
| <b>impossible [2]</b> 109/2<br>123/24   | <b>industry [3]</b> 69/23   | <b>insisted [1]</b> 182/10  | <b>intends [1]</b> 170/11                              |  |
| <b>impression [1]</b> 168/7   |   | <b>insisted [1]</b> 182/10  | <b>intends [1]</b> 170/11                              |  |
| <b>improvements [1]</b><br>51/19  |   | <b>insisted [1]</b> 182/10  | <b>intends [1]</b> 170/11                              |  |
| <b>inability [1]</b> 47/21  |   | <b>insisted [1]</b> 182/10  | <b>intends [1]</b> 170/11                              |  |
| <b>inaccurate [2]</b> 167/3<br>167/5  |   | <b>insisted [1]</b> 182/10  | <b>intends [1]</b> 170/11                              |  |
| <b>inch [1]</b> 124/2   |   | <b>insisted [1]</b> 182/10  | <b>intends [1]</b> 170/11                              |  |
| <b>incidence [1]</b> 59/2   |   | <b>insisted [1]</b> 182/10  | <b>intends [1]</b> 170/11                              |  |
| <b>incident [1]</b> 43/10   |   | <b>insisted [1]</b> 182/10  | <b>intends [1]</b> 170/11                              |  |
| <b>incidents [2]</b> 97/4<br>137/2  |   | <b>insisted [1]</b> 182/10  | <b>intends [1]</b> 170/11                              |  |
| <b>include [4]</b> 9/5 11/2<br>102/13 172/22  |   | <b>insisted [1]</b> 182/10  | <b>intends [1]</b> 170/11                              |  |
| <b>included [7]</b> 8/16<br>11/10 21/8 29/14<br>39/12 152/15 181/23                               |   | <b>insisted [1]</b> 182/10  | <b>intends [1]</b> 170/11                              |  |

|   |  |  |  |  |  |   |
|---|--|--|--|--|--|---|
| <b>I</b>  | 111/25 117/5 117/9<br>118/12 118/16 120/13<br>121/3 121/24 124/23<br>126/11 126/13 129/13<br>131/7 131/21 132/10<br>135/20 136/23 140/7<br>141/19 147/16 148/18<br>151/3 153/4 153/5<br>153/5 154/16 156/9<br>156/13 157/10 157/17<br>158/13 160/2 166/20<br>167/16 167/16 167/17<br>167/19 168/16 170/10<br>171/21 174/25 176/2<br>176/4 178/17 179/10<br>184/8 184/19 185/15<br>185/17                                   | <b>Jeremiah [2]</b> 108/17<br>186/16<br><b>JFSA [33]</b> 86/3 86/15<br>113/1 113/2 113/10<br>113/16 113/21 113/23<br>114/12 116/25 122/24<br>123/1 123/5 123/17<br>123/19 124/12 133/5<br>136/17 141/23 144/8<br>146/22 148/10 149/7<br>155/12 161/13 162/8<br>162/12 165/5 165/18<br>180/14 186/5 186/23<br>186/25<br><b>Jo [18]</b> 107/11<br>108/19 108/20 111/8<br>111/12 111/17 112/7<br>124/1 130/19 130/22<br>170/7 170/8 170/12<br>170/16 170/17 170/23<br>171/6 171/8<br><b>Jo's [4]</b> 111/10<br>131/14 132/1 135/7<br><b>job [17]</b> 32/3 47/11<br>47/16 47/21 48/23<br>48/25 51/25 55/19<br>56/2 70/20 76/16<br>82/18 93/12 103/13<br>115/5 140/14 147/10<br><b>jobs [6]</b> 53/14 53/24<br>54/4 54/9 54/17<br>169/23<br><b>Johnson [1]</b> 183/25<br><b>join [1]</b> 166/4<br><b>joined [5]</b> 66/6 68/8<br>110/4 165/15 166/4<br><b>joining [2]</b> 98/13<br>186/5<br><b>Joint [1]</b> 110/9<br><b>journalists [1]</b> 82/6<br><b>judge [2]</b> 159/3<br>182/16<br><b>judgment [7]</b> 90/7<br>90/7 90/9 90/11<br>181/20 182/18 182/23<br><b>Julian [2]</b> 141/22<br>142/1<br><b>July [14]</b> 72/7 114/2<br>114/17 116/16 117/9<br>117/11 118/23 119/7<br>120/9 120/10 122/14<br>128/21 134/17 145/11<br><b>July 2012 [1]</b> 122/14<br><b>July 2013 [1]</b> 128/21<br><b>jump [1]</b> 174/22<br><b>June [11]</b> 1/1 71/11<br>71/12 85/2 112/7<br>118/23 128/20 129/1<br>129/12 160/2 163/4<br><b>just [122]</b> 4/19 8/21<br>8/22 9/1 10/5 10/11<br>13/24 13/25 14/1 14/2<br>14/4 14/11 14/12<br>14/24 15/11 16/1 | 17/15 17/20 18/16<br>18/21 19/6 20/2 20/14<br>21/6 21/23 22/2 22/7<br>22/13 23/20 23/24<br>26/5 26/19 27/4 27/16<br>30/3 30/8 30/22 31/4<br>31/7 31/12 31/18<br>31/22 31/25 32/3<br>32/11 32/13 32/13<br>32/19 32/20 32/23<br>33/6 33/9 33/18 34/19<br>38/4 41/6 41/24 42/11<br>46/23 48/3 50/16<br>50/24 54/23 55/22<br>59/1 63/6 64/16 67/19<br>73/9 73/15 74/13 82/8<br>82/8 83/11 85/4 87/4<br>88/13 90/5 95/6 99/1<br>99/2 99/15 100/10<br>101/9 101/25 102/1<br>103/6 111/17 112/25<br>117/3 122/11 123/10<br>131/2 133/6 135/3<br>136/14 137/16 138/4<br>138/9 138/18 144/2<br>147/9 147/12 148/20<br>150/4 150/25 153/8<br>153/17 154/7 156/14<br>163/6 168/3 172/10<br>176/18 179/6 180/7<br>182/3 184/5 184/20<br>185/12 186/2 187/18<br><b>justice [10]</b> 90/9<br>90/10 103/16 108/7<br>118/14 126/1 126/3<br>144/1 181/19 183/13<br><b>justification [1]</b> 32/9  | 132/17 139/9 159/7<br><b>know [74]</b> 8/22 8/23<br>10/3 12/1 12/12 14/4<br>14/14 14/24 15/13<br>15/17 17/8 17/15 18/2<br>18/22 19/25 21/5 27/4<br>27/17 28/2 28/14<br>28/16 29/3 30/13<br>30/16 31/3 31/18<br>31/18 31/22 32/11<br>37/13 43/9 44/15 45/4<br>50/2 54/3 65/13 71/6<br>73/12 74/13 74/16<br>76/9 76/15 77/10<br>79/25 88/6 90/1 96/2<br>98/17 98/21 99/13<br>99/14 101/16 113/22<br>113/23 115/21 120/17<br>125/10 132/9 134/5<br>134/17 138/2 140/4<br>146/22 147/4 155/14<br>168/6 168/8 170/14<br>172/25 173/13 174/17<br>184/24 186/5 187/18<br><b>knowing [2]</b> 10/5<br>14/2<br><b>knowledge [18]</b><br>38/13 43/1 44/4 45/7<br>45/15 48/20 48/21<br>57/1 60/12 66/16<br>78/23 107/22 128/11<br>130/19 138/10 147/18<br>159/14 159/18<br><b>knowledge/recollecti<br/>on [1]</b> 66/16<br><b>known [9]</b> 2/3 6/23<br>61/18 72/6 96/6 110/8<br>136/25 144/3 178/17 |  |   |
| <b>involves [2]</b> 144/19<br>160/25<br><b>involving [1]</b> 97/2<br><b>Ireland [2]</b> 138/3<br>172/23<br><b>Iron [2]</b> 154/23 155/4<br><b>is [406]</b><br><b>isn't [10]</b> 12/2 16/16<br>24/6 33/24 54/5 64/1<br>83/21 87/12 95/15<br>170/25<br><b>isolated [1]</b> 43/10<br><b>issue [34]</b> 2/18 2/20<br>3/7 3/12 3/14 7/21<br>19/11 27/2 31/23 42/3<br>42/12 42/12 43/8<br>43/10 44/9 51/12<br>54/17 74/5 74/7 81/21<br>82/7 83/10 83/19<br>85/23 88/3 88/7 98/19<br>127/5 138/21 148/23<br>154/2 154/22 159/24<br>172/11<br><b>issued [3]</b> 85/13<br>139/24 158/19<br><b>issues [51]</b> 34/3<br>34/17 34/18 38/20<br>38/23 38/24 40/22<br>44/10 46/5 46/6 49/19<br>49/22 55/6 63/9 63/15<br>65/22 70/10 74/6<br>76/20 82/14 82/23<br>82/23 83/4 84/1 92/13<br>92/18 94/4 96/24 97/9<br>97/11 97/19 97/23<br>97/24 98/6 98/24<br>99/18 99/23 100/3<br>100/18 101/7 101/18<br>101/21 111/23 122/4<br>141/9 152/12 152/14<br>152/24 159/11 160/18<br>161/11<br><b>issues' [2]</b> 152/5<br>162/5<br><b>issuing [2]</b> 139/1<br>183/24<br><b>it [474]</b><br><b>it's [101]</b> 1/19 4/8<br>4/12 4/17 4/20 5/3 5/5<br>8/22 8/23 8/23 15/2<br>21/16 22/19 26/15<br>27/4 27/25 30/7 30/20<br>31/3 31/12 32/13<br>32/20 34/1 34/15 35/6<br>35/6 38/3 44/13 47/13<br>49/5 49/19 50/24 51/5<br>56/3 57/18 58/17<br>60/19 61/3 64/2 67/17<br>69/23 78/24 81/21<br>91/18 91/22 94/9<br>97/23 97/25 100/14<br>100/15 103/24 107/14 | <b>italics [2]</b> 7/2 7/14<br><b>item [2]</b> 173/25<br>174/25<br><b>item 5 [1]</b> 173/25<br><b>items [1]</b> 151/8<br><b>its [26]</b> 48/24 53/2<br>53/9 53/18 53/18<br>54/25 62/18 69/2 69/4<br>75/6 77/11 81/14<br>82/11 85/6 96/15 97/8<br>104/15 111/7 126/16<br>127/9 140/10 142/12<br>152/8 153/15 156/19<br>180/21<br><b>itself [7]</b> 34/12 77/4<br>94/2 97/11 124/16<br>127/24 142/10<br><b>ITV [1]</b> 186/6 | <b>J</b><br><b>JA [1]</b> 170/7<br><b>James [11]</b> 112/17<br>112/18 114/12 121/13<br>124/19 127/2 135/6<br>135/8 140/12 141/2<br>170/8<br><b>Jane [1]</b> 177/24<br><b>Janet [2]</b> 124/17<br>124/18<br><b>January [10]</b> 124/17<br>125/3 125/24 148/8<br>148/18 151/24 153/21<br>153/22 174/23 174/23<br><b>Jenkins [25]</b> 4/5 6/25<br>7/19 9/3 15/24 17/18<br>17/25 18/9 19/12<br>19/21 20/21 21/7<br>26/11 26/18 28/6<br>28/12 29/4 35/20<br>128/13 139/14 139/15<br>144/3 145/12 145/16<br>155/20<br><b>Jenkins' [12]</b> 3/8<br>7/22 8/15 16/25 19/17<br>20/16 24/13 24/21<br>27/6 28/21 28/25<br>32/10  | <b>Jeremiah [2]</b> 108/17<br>186/16<br><b>JFSA [33]</b> 86/3 86/15<br>113/1 113/2 113/10<br>113/16 113/21 113/23<br>114/12 116/25 122/24<br>123/1 123/5 123/17<br>123/19 124/12 133/5<br>136/17 141/23 144/8<br>146/22 148/10 149/7<br>155/12 161/13 162/8<br>162/12 165/5 165/18<br>180/14 186/5 186/23<br>186/25<br><b>Jo [18]</b> 107/11<br>108/19 108/20 111/8<br>111/12 111/17 112/7<br>124/1 130/19 130/22<br>170/7 170/8 170/12<br>170/16 170/17 170/23<br>171/6 171/8<br><b>Jo's [4]</b> 111/10<br>131/14 132/1 135/7<br><b>job [17]</b> 32/3 47/11<br>47/16 47/21 48/23<br>48/25 51/25 55/19<br>56/2 70/20 76/16<br>82/18 93/12 103/13<br>115/5 140/14 147/10<br><b>jobs [6]</b> 53/14 53/24<br>54/4 54/9 54/17<br>169/23<br><b>Johnson [1]</b> 183/25<br><b>join [1]</b> 166/4<br><b>joined [5]</b> 66/6 68/8<br>110/4 165/15 166/4<br><b>joining [2]</b> 98/13<br>186/5<br><b>Joint [1]</b> 110/9<br><b>journalists [1]</b> 82/6<br><b>judge [2]</b> 159/3<br>182/16<br><b>judgment [7]</b> 90/7<br>90/7 90/9 90/11<br>181/20 182/18 182/23<br><b>Julian [2]</b> 141/22<br>142/1<br><b>July [14]</b> 72/7 114/2<br>114/17 116/16 117/9<br>117/11 118/23 119/7<br>120/9 120/10 122/14<br>128/21 134/17 145/11<br><b>July 2012 [1]</b> 122/14<br><b>July 2013 [1]</b> 128/21<br><b>jump [1]</b> 174/22<br><b>June [11]</b> 1/1 71/11<br>71/12 85/2 112/7<br>118/23 128/20 129/1<br>129/12 160/2 163/4<br><b>just [122]</b> 4/19 8/21<br>8/22 9/1 10/5 10/11<br>13/24 13/25 14/1 14/2<br>14/4 14/11 14/12<br>14/24 15/11 16/1 | <b>17/15 17/20 18/16</b><br>18/21 19/6 20/2 20/14<br>21/6 21/23 22/2 22/7<br>22/13 23/20 23/24<br>26/5 26/19 27/4 27/16<br>30/3 30/8 30/22 31/4<br>31/7 31/12 31/18<br>31/22 31/25 32/3<br>32/11 32/13 32/13<br>32/19 32/20 32/23<br>33/6 33/9 33/18 34/19<br>38/4 41/6 41/24 42/11<br>46/23 48/3 50/16<br>50/24 54/23 55/22<br>59/1 63/6 64/16 67/19<br>73/9 73/15 74/13 82/8<br>82/8 83/11 85/4 87/4<br>88/13 90/5 95/6 99/1<br>99/2 99/15 100/10<br>101/9 101/25 102/1<br>103/6 111/17 112/25<br>117/3 122/11 123/10<br>131/2 133/6 135/3<br>136/14 137/16 138/4<br>138/9 138/18 144/2<br>147/9 147/12 148/20<br>150/4 150/25 153/8<br>153/17 154/7 156/14<br>163/6 168/3 172/10<br>176/18 179/6 180/7<br>182/3 184/5 184/20<br>185/12 186/2 187/18<br><b>justice [10]</b> 90/9<br>90/10 103/16 108/7<br>118/14 126/1 126/3<br>144/1 181/19 183/13<br><b>justification [1]</b> 32/9   | <b>K</b><br><b>Kay [9]</b> 106/19<br>106/22 106/25 124/24<br>129/8 130/13 170/11<br>170/12 188/14<br><b>Kay's [2]</b> 168/19<br>169/14<br><b>Kearns [13]</b> 37/8<br>37/11 37/13 37/16<br>48/2 84/17 89/17<br>89/21 95/2 95/6 99/2<br>106/6 188/6<br><b>keep [3]</b> 15/25 64/18<br>73/2<br><b>keeping [3]</b> 42/15<br>74/1 122/13<br><b>Keith [1]</b> 13/16<br><b>kept [1]</b> 123/24<br><b>key [2]</b> 70/9 86/3<br><b>kind [4]</b> 15/15 104/7<br>150/14 182/11<br><b>kindly [1]</b> 22/25<br><b>Kineton [1]</b> 186/8<br><b>KL [1]</b> 163/15<br><b>knew [9]</b> 20/1 28/9<br>28/19 64/6 64/13 65/2 | <b>L</b><br><b>lack [1]</b> 85/18<br><b>ladder [2]</b> 99/15<br>100/5<br><b>laid [1]</b> 83/22<br><b>land [1]</b> 186/12<br><b>language [1]</b> 182/17<br><b>large [4]</b> 52/13 90/2<br>98/23 102/5<br><b>large-scale [1]</b> 102/5<br><b>largely [2]</b> 49/23<br>100/17<br><b>last [36]</b> 1/13 3/16<br>3/22 4/3 4/9 4/12 4/15<br>9/5 10/21 19/10 19/14<br>19/19 19/24 20/7<br>20/12 21/11 23/17<br>25/15 26/22 27/3 32/4<br>32/19 40/9 40/20<br>41/14 43/12 43/13<br>50/22 56/24 72/9<br>95/11 102/10 129/6<br>132/4 184/4 184/5<br><b>lastly [1]</b> 33/5<br><b>late [4]</b> 88/16 109/24 |

|   |  |  |  |   |
|---|--|--|--|---|
| <b>L</b>  | 154/3 177/24   | 74/14 98/14  | 167/15 172/10 172/13   | 164/17 164/17 165/1   |
| <b>late... [2]</b> 109/25<br>181/23   | <b>letters [4]</b> 57/2<br>123/12 183/17 183/22  | <b>listed [1]</b> 77/20  | 173/3 173/21 178/3<br>179/10 181/4   | <b>MacLeod [1]</b> 177/24   |
| <b>later [6]</b> 6/12 40/16<br>72/5 111/25 148/5<br>151/21  | <b>level [29]</b> 42/4 42/14<br>43/8 43/14 43/15<br>43/15 44/11 44/14<br>44/19 44/24 44/24   | <b>listened [2]</b> 91/6<br>168/22   | <b>looked [11]</b> 7/4 9/15<br>21/11 21/15 21/23<br>22/4 44/13 115/3<br>148/3 149/21 171/25  | <b>made [49]</b> 3/8 4/4<br>22/18 22/25 23/1 23/2<br>23/5 23/15 23/18<br>23/21 24/5 24/6 24/8<br>28/25 29/1 30/17<br>30/19 40/21 43/12<br>54/15 56/11 58/1<br>62/16 64/20 67/8<br>80/22 94/7 97/15<br>97/16 111/17 128/9<br>137/21 138/14 139/10<br>149/5 150/25 153/1<br>158/14 158/18 166/3<br>167/18 167/25 169/16<br>170/5 179/9 182/10<br>183/4 183/9 186/18 |
| <b>latter [1]</b> 165/9   | 54/16 55/7 55/8 55/23<br>61/24 62/3 62/7 62/24   | <b>listing [1]</b> 179/25  | 116/10 118/4 120/17<br>126/3 129/15 134/19<br>170/12   | <b>Mail [11]</b> 65/22 84/1<br>91/20 93/3 93/8 154/3<br>154/22 154/23 155/3<br>155/4 155/5  |
| <b>latterly [1]</b> 110/16  | 64/5 64/10 64/11<br>64/17 82/19 96/8<br>99/19 99/19 99/19<br>115/22  | <b>literally [2]</b> 185/9<br>185/14   | <b>looks [10]</b> 15/5 27/17<br>27/19 28/4 31/2 33/23<br>36/8 36/9 62/19 62/19   | <b>main [13]</b> 8/3 9/10<br>16/12 25/6 25/7 25/10<br>25/13 129/17 132/6<br>134/7 159/13 159/13<br>172/21   |
| <b>law [2]</b> 1/23 11/10   | <b>levels [2]</b> 42/24 50/9   | <b>litigants [1]</b> 88/1  | <b>loop [1]</b> 126/18   | <b>maintain [1]</b> 15/8  |
| <b>lawyer [6]</b> 1/25<br>124/10 150/8 150/19<br>177/15 182/24  | <b>liability [1]</b> 131/12  | <b>litigation [29]</b> 3/25<br>90/20 108/11 123/22<br>124/4 150/19 176/13<br>177/6 177/7 177/9<br>177/17 178/1 178/11<br>178/14 178/17 178/18<br>178/22 179/5 179/8<br>179/18 180/5 180/17<br>181/9 181/16 181/18<br>181/22 181/25 182/2<br>184/1  | <b>Lord [5]</b> 90/10 114/4<br>116/13 117/10 124/18  | <b>major [3]</b> 50/8 93/2<br>93/4  |
| <b>lawyers [4]</b> 2/8 145/6<br>178/10 178/12   | <b>lies [2]</b> 20/5 98/23   | <b>little [6]</b> 6/22 13/25<br>30/16 67/24 81/3<br>130/10   | <b>Lord Arbuthnot [4]</b><br>114/4 116/13 117/10<br>124/18   | <b>majority [1]</b> 158/23  |
| <b>lay [1]</b> 53/6   | <b>life [1]</b> 22/15  | <b>live [4]</b> 36/17 40/16<br>40/22 139/10  | <b>Lord Justice [1]</b><br>90/10   | <b>make [33]</b> 2/5 9/5<br>11/4 14/24 29/2 41/3<br>53/9 53/16 53/21 54/7<br>54/24 58/9 58/16<br>59/22 75/21 91/24<br>93/13 93/15 97/15<br>108/2 122/18 132/17<br>134/8 135/21 148/3<br>151/18 152/14 156/25<br>157/8 158/16 158/21<br>159/15 186/17  |
| <b>layers [2]</b> 101/12<br>132/16  | <b>light [4]</b> 65/19 108/7<br>138/22 145/3   | <b>Liverpool [2]</b> 57/17<br>57/18  | <b>lose [2]</b> 179/11<br>179/15   | <b>making [10]</b> 19/11<br>44/12 48/4 49/5 49/8<br>76/17 87/2 90/21<br>113/16 113/17   |
| <b>lead [5]</b> 14/5 98/8<br>168/6 168/17 170/5   | <b>like [41]</b> 4/21 6/10<br>10/10 12/21 14/6<br>14/22 22/7 40/8 46/11<br>52/13 62/19 62/19<br>62/25 63/7 65/7 66/22<br>69/22 73/4 81/21<br>82/21 84/4 91/22<br>92/16 93/10 98/24<br>108/2 108/4 108/12<br>108/15 113/15 124/15<br>126/17 132/4 143/16<br>159/9 165/4 172/22<br>182/21 185/3 186/19<br>187/18 | <b>LLP [1]</b> 110/25  | <b>losing [3]</b> 53/14 54/8<br>54/16  | <b>malicious [1]</b> 109/5  |
| <b>leadership [2]</b> 40/4<br>83/20   | <b>likelihood [1]</b> 71/25  | <b>local [32]</b> 41/3 41/25<br>42/20 42/25 43/9<br>43/14 43/21 44/4 44/8<br>44/11 44/14 44/15<br>44/18 49/20 54/14<br>54/16 55/7 55/16<br>55/20 55/23 57/16<br>57/16 57/17 62/4 63/2<br>63/25 99/16 99/19<br>100/2 103/13 108/21<br>111/7   | <b>loss [8]</b> 43/6 47/19<br>53/8 59/7 59/11 161/5<br>174/19 175/22   | <b>man [1]</b> 182/15   |
| <b>learn [2]</b> 134/7<br>140/17  | <b>likely [5]</b> 79/6 102/10<br>102/13 158/7 162/4  | <b>locally [1]</b> 63/20   | <b>losses [30]</b> 17/13<br>27/13 29/8 31/10 42/7<br>42/8 42/23 43/17 44/7<br>47/5 47/9 47/12 47/20<br>47/23 47/25 49/24<br>50/1 51/3 51/4 51/6<br>51/14 51/15 52/13<br>55/14 55/17 63/18<br>87/3 93/12 113/6<br>133/7 | <b>managed [2]</b> 142/23<br>180/14   |
| <b>least [10]</b> 84/21 86/5<br>86/23 94/17 100/16<br>117/24 167/12 168/21<br>172/16 180/22   | <b>likes [1]</b> 93/4  | <b>logging [1]</b> 24/7  | <b>lost [3]</b> 53/23 54/4<br>169/23   | <b>management [6]</b><br>80/8 94/20 121/8<br>121/18 132/14 132/15   |
| <b>leave [3]</b> 5/22 31/8<br>165/5   | <b>limit [2]</b> 149/20<br>150/21  | <b>London [1]</b> 110/13   | <b>lot [11]</b> 45/22 45/25<br>95/19 108/13 124/4<br>125/5 137/5 138/17<br>144/9 152/20 155/8  | <b>Manager [3]</b> 3/17<br>3/19 3/23  |
| <b>led [8]</b> 73/9 113/12<br>130/17 131/4 135/8<br>140/11 141/4 164/7  | <b>limitations [1]</b> 153/16  | <b>long [8]</b> 8/23 32/13<br>72/21 92/5 98/14<br>103/24 135/19 168/13   | <b>lots [1]</b> 186/13   | <b>managerial [1]</b> 63/13   |
| <b>Lee [4]</b> 179/10<br>184/12 184/15 184/17   | <b>limited [14]</b> 39/9<br>71/21 76/24 78/2 82/5<br>85/14 87/1 133/10<br>139/19 149/1 153/14<br>161/9 172/21 181/23   | <b>long-term [1]</b> 72/21   | <b>lowest [1]</b> 44/3   | <b>managers [6]</b> 43/1<br>65/23 65/24 70/24<br>102/24 103/3   |
| <b>left [15]</b> 4/18 27/25<br>29/25 30/11 32/6 49/2<br>88/1 110/8 127/21<br>130/8 138/20 151/1<br>155/16 155/17 165/11                                 | <b>Limited's [2]</b> 86/12<br>146/23   | <b>longer [3]</b> 72/16<br>77/16 82/7  | <b>LTB [3]</b> 85/10 85/11<br>85/12  | <b>many [17]</b> 54/3 57/12<br>63/17 95/21 95/21<br>108/8 108/23 108/23   |
| <b>left-hand [1]</b> 4/18   | <b>line [23]</b> 5/5 13/21<br>13/23 15/9 16/4 19/25<br>20/19 26/2 26/8 26/15<br>29/6 31/2 33/14 33/16<br>33/19 33/20 33/21<br>33/22 59/23 98/14<br>107/11 140/15 140/17  | <b>longstanding [1]</b><br>89/21   | <b>lunch [3]</b> 106/9<br>111/11 182/8   |   |
| <b>legal [20]</b> 2/3 2/17<br>2/21 60/6 60/9 74/9<br>75/2 84/6 88/10 96/3<br>96/14 96/15 106/4<br>132/13 142/13 159/10<br>177/25 181/14 182/20<br>183/1 | <b>lines [1]</b> 187/19  | <b>look [55]</b> 4/17 4/23<br>6/11 7/24 9/7 13/12<br>15/22 16/21 22/13<br>24/11 25/4 33/5 33/6<br>34/5 67/16 71/19 77/2<br>85/1 98/19 109/15<br>114/25 115/22 115/23<br>117/5 117/24 119/15<br>121/24 124/15 127/24<br>136/23 136/24 138/18<br>140/6 141/24 142/25<br>144/5 144/16 148/6<br>149/12 151/21 151/25<br>153/3 153/17 153/25<br>156/13 159/24 163/3 | <b>lunchtime [1]</b> 167/21  |   |
| <b>lend [1]</b> 87/17   | <b>linked [3]</b> 10/8 10/13<br>173/17   | <b>locally [1]</b> 63/20   | <b>Lyons [6]</b> 118/22<br>118/25 119/2 128/18<br>133/21 134/11  |   |
| <b>length [1]</b> 51/8  | <b>Linnell [11]</b> 106/20<br>106/22 106/25 129/8<br>176/18 185/2 186/2<br>187/6 187/10 187/15<br>188/14   | <b>logically [1]</b> 63/20   | <b>M</b>   |   |
| <b>lengths [1]</b> 152/7  | <b>Linnell's [1]</b> 118/12  | <b>logically [1]</b> 63/20   | <b>M035 [1]</b> 170/20   |   |
| <b>lengthy [1]</b> 126/11   | <b>list [4]</b> 32/10 74/11  | <b>logically [1]</b> 63/20   | <b>M054 [7]</b> 160/5<br>161/23 163/6 164/6  |   |
| <b>less [3]</b> 50/7 78/18<br>169/21  |  | <b>logically [1]</b> 63/20   |  |   |
| <b>let [5]</b> 21/5 64/16<br>88/18 99/2 131/18  |  | <b>logically [1]</b> 63/20   |  |   |
| <b>let's [10]</b> 22/11 27/2<br>42/12 54/17 63/16<br>114/2 117/5 129/3<br>153/3 167/15  |  | <b>logically [1]</b> 63/20   |  |   |
| <b>letter [12]</b> 85/11<br>85/12 117/1 117/5<br>117/7 118/11 118/18<br>121/13 127/2 127/3  |  | <b>logically [1]</b> 63/20   |  |   |



|   |  |  |   |   |
|---|--|--|---|---|
| <b>M</b>  | 106/17 108/20 112/14<br>118/11 126/17 131/13<br>131/18 137/21 141/10<br>146/8 150/22 151/16<br>175/20 187/12   | <b>meet [4]</b> 44/19<br>115/24 129/8 132/23<br><b>meeting [57]</b> 71/12<br>112/16 112/18 112/21<br>112/23 114/2 114/6<br>114/7 114/8 115/1<br>115/3 115/13 115/16<br>116/2 116/15 116/18<br>117/9 118/21 119/5<br>119/9 119/14 120/8<br>120/9 120/12 120/13<br>124/24 128/17 128/20<br>128/25 129/17 132/6<br>132/19 133/12 133/18<br>138/22 142/8 148/12<br>151/5 151/13 151/23<br>154/6 154/10 166/17<br>166/20 166/21 167/10<br>167/18 167/20 167/25<br>169/1 170/4 170/16<br>172/12 173/21 173/24<br>175/11 175/19   | 72/1 76/23<br><b>memory [10]</b> 18/23<br>19/4 57/18 57/19<br>68/15 80/4 136/11<br>138/3 143/21 177/5<br><b>mention [2]</b> 30/5<br>109/14<br><b>mentioned [10]</b> 6/8<br>13/20 20/18 33/13<br>93/17 110/22 123/17<br>125/25 171/14 186/2<br><b>mere [1]</b> 182/24<br><b>merely [1]</b> 141/17<br><b>merge [2]</b> 73/1 82/22<br><b>merger [3]</b> 70/14<br>74/20 74/22<br><b>merging [3]</b> 71/4<br>72/25 73/25<br><b>mess [1]</b> 186/18<br><b>met [14]</b> 112/17<br>113/12 113/19 118/25<br>119/2 119/5 129/21<br>142/6 142/7 142/16<br>153/23 184/18 186/11<br>186/25<br><b>methods [2]</b> 103/15<br>103/16<br><b>Michael [1]</b> 138/15<br><b>mid [1]</b> 5/1<br><b>mid-way [1]</b> 5/1<br><b>middle [3]</b> 24/1 24/1<br>182/8<br><b>might [20]</b> 1/15 2/10<br>27/25 29/6 50/14<br>51/12 52/3 53/22 97/1<br>97/11 101/16 105/15<br>115/12 126/21 131/16<br>135/18 145/3 145/23<br>161/23 170/23<br><b>Mike [1]</b> 119/17<br><b>million [5]</b> 78/15<br>78/19 78/21 174/18<br>184/1<br><b>million' [1]</b> 78/3<br><b>mind [12]</b> 11/12<br>15/12 27/19 27/21<br>34/14 65/2 69/17<br>89/16 129/20 130/19<br>152/20 179/23<br><b>mindful [1]</b> 109/3<br><b>mindset [1]</b> 133/16<br><b>Mine [1]</b> 83/23<br><b>Minister [2]</b> 85/16<br>183/25<br><b>ministers [2]</b> 183/18<br>183/20<br><b>minus [2]</b> 152/21<br>186/12<br><b>minute [9]</b> 36/21<br>36/24 82/8 87/4 88/14<br>163/4 164/8 164/20<br>174/14<br><b>minutes [20]</b> 23/19<br>31/16 89/7 147/21 | 147/24 147/25 148/1<br>148/5 148/8 148/17<br>151/4 151/10 153/17<br>154/12 154/13 165/3<br>173/23 174/13 185/14<br>185/18<br><b>misbalance [3]</b> 43/6<br>51/21 55/13<br><b>miscarriage [3]</b><br>108/7 126/3 144/1<br><b>miscarriages [1]</b><br>126/1<br><b>misinterpretation [1]</b><br>161/8<br><b>misremembering [1]</b><br>161/1<br><b>misrepresentation</b><br><b>[1]</b> 171/10<br><b>missing [1]</b> 17/3<br><b>mistake [5]</b> 30/3 30/7<br>32/20 107/14 107/15<br><b>mistresses [2]</b> 90/2<br>186/16<br><b>misunderstanding</b><br><b>[1]</b> 58/14<br><b>Mm [1]</b> 67/23<br><b>model [2]</b> 78/6<br>141/20<br><b>moment [5]</b> 7/4 20/6<br>21/15 27/2 184/5<br><b>momentum [1]</b> 96/19<br><b>money [21]</b> 41/7<br>59/17 109/10 113/5<br>131/13 133/2 133/6<br>133/24 133/25 134/3<br>134/13 135/19 151/7<br>151/8 167/14 168/11<br>169/21 172/1 172/7<br>172/25 173/5<br><b>monies [1]</b> 185/22<br><b>monitor [1]</b> 110/9<br><b>monitored [2]</b> 42/13<br>54/6<br><b>monitoring [4]</b> 64/9<br>64/12 64/15 110/9<br><b>month [3]</b> 55/22<br>71/25 153/24<br><b>months [3]</b> 1/18 6/6<br>175/8<br><b>more [50]</b> 4/25 9/1<br>13/15 13/18 15/14<br>20/16 20/23 22/9<br>22/14 30/8 30/16<br>30/18 30/21 32/12<br>33/8 33/18 34/6 34/15<br>34/25 35/3 44/16<br>45/25 50/7 51/22 52/8<br>54/2 55/13 61/11<br>63/11 68/24 74/5<br>83/20 87/16 89/3<br>91/22 100/5 101/25<br>105/25 117/25 126/22<br>134/23 152/20 152/25<br>169/20 169/21 169/24 |
| <b>many... [9]</b> 113/20<br>130/11 130/18 134/3<br>137/15 137/15 170/22<br>173/2 173/6<br><b>March [15]</b> 5/6 7/3<br>7/10 19/15 20/10<br>21/25 23/6 94/11 97/3<br>97/4 98/10 116/15<br>145/13 151/24 151/25<br><b>March 2002 [3]</b> 94/11<br>97/4 98/10<br><b>margins [1]</b> 150/21<br><b>Marine [1]</b> 5/13<br><b>mark [6]</b> 16/15 67/25<br>100/12 100/16 100/25<br>101/6<br><b>marked [3]</b> 15/23<br>15/24 19/17<br><b>marked-up [1]</b> 15/23<br><b>material [6]</b> 3/13 20/4<br>20/6 28/6 28/21 80/20<br><b>Matrix [1]</b> 165/10<br><b>matter [11]</b> 2/1 5/4<br>5/16 52/6 100/15<br>108/10 150/25 161/22<br>162/9 175/10 185/25<br><b>matters [12]</b> 39/25<br>40/6 44/2 46/1 49/14<br>93/25 94/24 101/13<br>109/16 110/18 175/5<br>175/14<br><b>Matthews [1]</b> 13/17<br><b>may [51]</b> 1/7 1/12<br>5/24 9/5 9/11 9/19<br>9/20 10/2 11/4 14/2<br>14/8 16/23 17/12 20/4<br>20/20 25/8 28/11<br>30/10 31/9 37/18 38/8<br>70/16 76/5 84/5 88/17<br>89/14 89/15 90/1 90/1<br>90/6 91/11 106/4<br>107/5 114/20 123/15<br>125/25 126/7 126/13<br>126/15 129/6 131/19<br>144/2 144/14 144/21<br>145/6 145/9 157/5<br>157/23 158/8 161/1<br>184/5<br><b>maybe [6]</b> 8/3 10/4<br>14/12 15/17 58/13<br>95/17<br><b>me [53]</b> 2/5 2/9 2/11<br>2/22 5/5 8/25 14/1<br>18/24 21/5 23/8 23/14<br>26/23 27/4 27/12<br>30/17 31/4 31/15 34/2<br>45/11 45/21 45/24<br>48/7 48/13 51/4 53/19<br>59/15 62/23 64/16<br>67/9 70/25 81/3 88/13<br>91/8 91/22 95/5 96/9<br>99/2 99/3 101/17 | <b>me.' [1]</b> 12/18<br><b>mean [25]</b> 26/2 30/7<br>30/9 30/18 31/12<br>31/19 41/6 66/12<br>72/23 85/23 87/13<br>89/4 96/9 97/7 97/15<br>102/15 102/19 140/18<br>150/7 152/17 155/14<br>159/17 160/23 165/9<br>179/7<br><b>meaning [1]</b> 78/10<br><b>meaningful [1]</b> 81/7<br><b>means [6]</b> 75/3 77/20<br>146/3 157/9 168/6<br>170/8<br><b>meant [5]</b> 9/2 14/1<br>14/25 80/16 158/23<br><b>measure [2]</b> 47/10<br>47/14<br><b>mechanism [2]</b> 79/10<br>114/22<br><b>mechanisms [1]</b><br>181/15<br><b>media [2]</b> 96/22<br>98/18<br><b>mediate [8]</b> 156/9<br>159/20 159/25 160/14<br>161/4 163/10 164/3<br>164/23<br><b>mediated [2]</b> 160/22<br>164/14<br><b>mediation [75]</b> 85/19<br>86/22 114/9 114/10<br>114/11 114/15 114/18<br>140/7 140/23 141/9<br>141/14 141/17 141/19<br>142/21 144/7 146/11<br>147/16 147/19 147/22<br>148/16 150/6 152/7<br>155/22 155/24 156/2<br>156/10 156/11 156/21<br>157/6 157/10 157/16<br>157/17 157/24 157/24<br>158/2 158/9 158/14<br>158/18 158/24 159/12<br>159/16 160/7 160/8<br>160/12 160/16 160/20<br>160/22 161/13 161/13<br>161/14 161/23 162/3<br>162/14 162/16 162/21<br>162/24 163/12 164/4<br>164/24 165/8 169/20<br>170/11 176/9 177/22<br>178/3 178/6 178/8<br>180/10 180/11 180/13<br>180/14 180/15 180/20<br>180/22 181/7<br><b>mediations [1]</b><br>168/17 | <b>meet [4]</b> 44/19<br>115/24 129/8 132/23<br><b>meeting [57]</b> 71/12<br>112/16 112/18 112/21<br>112/23 114/2 114/6<br>114/7 114/8 115/1<br>115/3 115/13 115/16<br>116/2 116/15 116/18<br>117/9 118/21 119/5<br>119/9 119/14 120/8<br>120/9 120/12 120/13<br>124/24 128/17 128/20<br>128/25 129/17 132/6<br>132/19 133/12 133/18<br>138/22 142/8 148/12<br>151/5 151/13 151/23<br>154/6 154/10 166/17<br>166/20 166/21 167/10<br>167/18 167/20 167/25<br>169/1 170/4 170/16<br>172/12 173/21 173/24<br>175/11 175/19<br><b>meetings [15]</b> 44/18<br>99/20 113/18 125/4<br>153/7 153/19 155/19<br>159/24 165/3 165/9<br>172/10 183/19 186/5<br>186/6 186/11<br><b>member [15]</b> 40/10<br>45/16 45/17 52/17<br>53/3 56/13 59/3 63/24<br>68/14 70/11 71/12<br>75/12 82/9 87/2 87/5<br><b>members [82]</b> 39/9<br>39/21 46/13 46/21<br>46/24 47/4 48/10<br>48/15 48/24 49/10<br>50/20 53/14 53/18<br>53/23 54/3 54/8 54/18<br>55/3 55/22 56/3 57/13<br>57/21 59/1 60/7 60/9<br>62/1 63/17 65/14<br>65/15 67/7 69/2 69/4<br>69/5 69/6 69/12 69/13<br>70/8 70/25 75/21 79/1<br>86/23 87/12 91/18<br>92/17 92/24 93/6<br>93/12 93/20 95/13<br>95/17 95/19 95/21<br>96/15 97/2 97/9 97/12<br>97/14 97/19 98/6<br>98/19 99/11 100/12<br>101/3 102/12 102/22<br>102/23 102/23 102/24<br>103/2 103/18 104/2<br>104/4 104/6 104/7<br>104/13 104/15 104/18<br>104/19 104/19 105/10<br>105/12 105/19<br><b>members' [1]</b> 79/18<br><b>membership [3]</b> 78/6<br>93/25 94/15<br><b>memorable [1]</b> 18/25<br><b>Memorandum [2]</b> |   |   |

|          |  |  |   |   |
|----------|--|--|---|---|
| <b>M</b> | 106/23 118/10 125/7<br>125/7 125/24 125/25<br>126/12 139/23 139/23<br>155/20 176/15 176/15<br>177/4 181/5 181/19<br>182/9 183/17 185/2<br>185/8 185/9 185/20<br>185/21 186/4 186/10<br>186/22 187/19 188/4<br>188/10 188/17 188/19 | 186/16<br><b>Mrs Hamilton [1]</b><br>112/14<br><b>Mrs Jeremiah [1]</b><br>186/16<br><b>Ms [23]</b> 15/24 37/12<br>37/13 88/20 89/2 92/1<br>92/15 93/17 95/3 95/4<br>100/8 100/12 105/22<br>111/24 112/9 118/12<br>168/1 176/18 185/2<br>186/2 187/15 188/8<br>188/12<br><b>Ms Hamilton [1]</b><br>112/9<br><b>Ms Hamilton's [1]</b><br>111/24<br><b>Ms Hodge [6]</b> 37/13<br>92/1 92/15 93/17<br>100/12 105/22<br><b>Ms Linnell [4]</b> 176/18<br>185/2 186/2 187/15<br><b>Ms Linnell's [1]</b><br>118/12<br><b>Ms Lowther [1]</b><br>15/24<br><b>Ms Vennells [1]</b><br>168/1<br><b>Ms Watt [4]</b> 88/20<br>89/2 95/3 100/8<br><b>much [14]</b> 1/4 1/7<br>36/14 37/7 67/16<br>68/20 76/22 103/4<br>112/3 130/15 139/18<br>187/10 187/11 187/21<br><b>much-discussed [1]</b><br>76/22<br><b>muddled [3]</b> 143/13<br>143/22 170/18<br><b>must [7]</b> 2/11 2/22<br>18/4 79/17 92/3 124/3<br>172/24<br><b>my [129]</b> 4/8 5/25<br>10/5 11/12 14/2 26/4<br>26/16 26/25 28/2<br>31/24 32/1 32/3 34/3<br>34/20 35/17 36/9<br>37/13 42/6 43/12<br>43/12 44/13 45/24<br>46/9 48/22 48/23<br>48/25 49/17 51/23<br>52/13 52/25 54/14<br>56/22 57/1 58/1 58/15<br>58/20 58/21 60/12<br>62/23 64/1 64/13<br>64/20 65/1 66/15 67/1<br>67/10 68/14 68/19<br>69/7 70/19 72/10<br>72/16 73/13 75/18<br>76/3 76/15 76/16<br>80/25 82/7 82/18 83/6<br>83/7 87/19 89/4 90/1<br>92/10 92/23 95/16<br>96/13 96/22 98/9 | 101/17 103/13 103/17<br>103/23 105/21 107/20<br>108/12 108/17 110/16<br>111/7 111/20 112/2<br>112/23 113/24 114/20<br>114/21 116/3 118/2<br>123/8 123/11 125/14<br>127/2 127/6 128/21<br>135/4 135/6 136/19<br>137/12 138/3 140/20<br>142/8 142/17 143/13<br>143/16 143/24 144/13<br>144/18 145/9 148/13<br>158/1 158/18 166/24<br>170/3 170/17 171/16<br>174/17 174/17 175/15<br>176/4 176/12 176/19<br>177/5 177/7 180/25<br>181/17 183/10 184/4<br>186/12<br><b>myself [3]</b> 46/8<br>108/17 110/21 | 6/15 21/14 34/21 35/6<br>36/16 51/19 73/1<br>74/19 89/2 89/12<br>105/24 107/10 126/12<br>138/17 139/16 168/9<br>168/10 169/24 177/8<br><b>needed [3]</b> 166/16<br>177/11 186/18<br><b>needn't [1]</b> 177/3<br><b>needs [10]</b> 1/8 13/15<br>13/18 20/16 27/24<br>31/5 33/8 109/9<br>170/12 174/7<br><b>negotiate [2]</b> 66/24<br>180/15<br><b>negotiated [1]</b> 50/10<br><b>negotiating [1]</b> 70/6<br><b>negotiation [1]</b> 73/22<br><b>negotiations [2]</b><br>45/22 72/20<br><b>neither [1]</b> 21/14<br><b>Neneh [6]</b> 7/8 8/13<br>13/16 17/24 21/6 22/2<br><b>network [9]</b> 40/18<br>43/13 54/12 113/8<br>121/9 126/22 132/15<br>142/23 169/18<br><b>never [9]</b> 27/19 91/6<br>101/9 109/1 109/2<br>130/12 172/9 173/15<br>174/16<br><b>new [11]</b> 31/23 45/5<br>46/11 73/8 80/22<br>109/12 138/22 145/2<br>145/7 148/13 149/18<br><b>Newsagents [3]</b> 72/4<br>72/13 73/7<br><b>next [12]</b> 5/14 13/13<br>18/7 29/18 36/17 37/8<br>71/25 89/7 123/4<br>140/6 140/10 174/22<br><b>NFSP [34]</b> 71/21<br>71/25 72/7 72/11<br>72/19 73/11 74/10<br>74/14 74/22 75/1<br>76/20 76/24 77/4<br>78/12 79/16 79/19<br>80/13 81/13 82/10<br>85/22 86/14 90/16<br>90/17 90/21 90/23<br>90/24 90/24 100/12<br>100/14 100/19 100/23<br>113/25 124/13 186/25<br><b>NFSP' [1]</b> 78/20<br><b>NFSP0001463 [1]</b><br>67/15<br><b>night [2]</b> 55/13 105/8<br><b>nil [11]</b> 5/25 6/3 6/14<br>7/5 7/17 10/5 14/3<br>16/6 19/21 26/11 33/2<br><b>nine [1]</b> 68/15<br><b>Nippi [1]</b> 67/22<br><b>no [144]</b> 12/4 15/2<br>15/11 15/17 17/1 17/5 |
|          |  | <b>N</b>   |   |   |
|          |  | <b>name [7]</b> 21/13 37/13<br>37/15 90/1 106/24<br>110/24 154/3<br><b>namely [2]</b> 3/7<br>145/16<br><b>names [1]</b> 131/5<br><b>narrow [4]</b> 148/9<br>149/11 149/13 150/20<br><b>narrower [1]</b> 150/3<br><b>narrowest [1]</b> 150/21<br><b>narrowing [1]</b> 152/13<br><b>national [46]</b> 40/17<br>42/4 42/14 43/8 43/15<br>44/14 45/17 45/22<br>54/13 54/25 55/8<br>61/24 62/2 62/7 62/24<br>64/5 64/9 64/11 64/17<br>65/15 65/25 66/6<br>67/10 68/13 68/17<br>68/20 70/1 71/10 72/3<br>72/12 73/6 77/16<br>82/19 82/19 83/1 83/2<br>83/4 83/22 85/5 90/12<br>93/19 95/10 96/8<br>99/21 186/23 187/2<br><b>nationally [1]</b> 98/5<br><b>natural [1]</b> 103/16<br><b>nature [5]</b> 16/14<br>29/23 56/16 74/10<br>78/22<br><b>nearly [1]</b> 124/2<br><b>NEC [5]</b> 71/13 80/21<br>82/9 85/2 87/5<br><b>necessarily [8]</b> 66/10<br>69/17 69/21 69/22<br>75/3 81/9 184/19<br>186/20<br><b>necessary [2]</b> 173/7<br>181/15<br><b>need [21]</b> 5/22 5/23  |   |   |

|   |   |   |  |  |
|---|---|---|--|--|
| <b>N</b>  | 33/14 34/10 34/23<br>86/24 91/2   | 135/15 154/16 161/1<br>161/16   | <b>October [6]</b> 67/14<br>67/19 68/2 74/9<br>173/21 173/22   | 171/21 179/24 180/11<br>180/14 182/3 184/7   |
| <b>no...</b> [138] 17/14<br>18/11 18/21 19/7 23/8<br>25/3 25/20 27/16<br>28/24 30/7 30/25<br>31/12 31/12 32/22<br>33/4 34/2 34/3 35/17<br>35/25 36/14 42/6<br>42/18 42/18 45/23<br>48/13 48/14 48/17<br>49/13 51/14 53/13<br>53/20 54/7 57/25 58/8<br>58/13 61/21 62/4<br>62/12 62/23 63/16<br>63/22 64/3 64/3 64/5<br>64/5 65/5 65/12 68/10<br>69/19 69/19 69/23<br>69/23 72/16 73/13<br>74/17 76/11 77/16<br>78/11 78/18 81/6 82/7<br>83/11 83/21 84/25<br>88/3 88/9 88/12 88/12<br>89/10 89/18 89/18<br>91/5 98/16 98/18<br>99/16 109/12 111/19<br>113/3 113/9 113/24<br>116/3 118/6 119/20<br>120/12 123/3 123/6<br>123/7 123/19 123/20<br>124/5 126/2 127/21<br>128/10 128/12 128/14<br>133/2 133/14 134/14<br>135/25 137/1 138/1<br>139/15 142/8 142/17<br>143/1 145/18 145/22<br>153/1 153/5 154/11<br>156/3 156/4 156/10<br>157/16 159/13 160/16<br>164/19 167/21 169/13<br>170/6 171/15 173/9<br>173/15 175/17 176/9<br>177/14 178/23 179/21<br>179/21 179/24 182/16<br>182/23 184/17 185/8<br>185/12 187/2 187/17<br>187/17 | <b>normally [1]</b> 180/12<br><b>not [223]</b><br><b>note [10]</b> 154/2 167/4<br>167/5 167/15 170/5<br>171/1 171/17 175/25<br>176/2 184/6<br><b>noted [5]</b> 163/18<br>164/4 164/15 164/24<br>174/3<br><b>notepaper [1]</b> 118/12<br><b>notes [4]</b> 133/18<br>143/16 151/23 171/16<br><b>nothing [3]</b> 122/22<br>133/8 147/22<br><b>noticing [1]</b> 121/3<br><b>notified [1]</b> 80/21<br><b>notify [1]</b> 145/6<br><b>November [3]</b> 38/19<br>151/10 174/14<br><b>now [111]</b> 2/16 3/13<br>4/8 4/10 5/6 6/6 6/6<br>6/18 9/7 10/19 15/5<br>20/4 20/14 21/11<br>21/18 22/11 23/13<br>24/19 27/8 27/17<br>27/19 30/14 36/17<br>36/21 39/2 45/8 46/15<br>48/18 49/22 50/1<br>50/12 50/17 50/24<br>53/2 53/11 54/23 57/3<br>57/9 58/24 59/1 60/19<br>61/13 64/6 65/22 67/6<br>67/12 68/16 69/1<br>70/13 71/19 73/10<br>74/4 76/19 77/2 79/5<br>81/1 81/12 81/21<br>81/21 82/8 85/16<br>85/24 86/21 86/23<br>87/4 89/5 90/10 92/2<br>92/11 93/17 100/20<br>104/3 106/9 107/8<br>109/20 112/12 117/5<br>120/6 120/24 124/15<br>124/18 124/24 127/1<br>127/3 127/15 129/23<br>130/10 136/23 138/15<br>140/6 141/24 146/11<br>147/18 148/6 151/25<br>152/11 152/21 153/19<br>167/3 168/23 170/7<br>170/14 172/4 172/15<br>174/12 175/13 176/12<br>177/16 183/16 185/2<br>186/9 | <b>number 28 [1]</b><br>154/16<br><b>number 3 [1]</b> 90/7<br><b>numbered [1]</b> 10/7<br><b>numbers [3]</b> 6/18<br>65/3 99/7<br><b>numerical [1]</b> 107/15   | <b>odds [1]</b> 29/25<br><b>odds [1]</b> 109/2<br><b>off [11]</b> 120/13<br>128/16 134/4 162/25<br>166/9 166/9 168/4<br>168/9 176/4 176/19<br>180/7<br><b>offer [6]</b> 60/6 60/9<br>75/21 81/11 81/18<br>96/15<br><b>offering [2]</b> 14/4<br>73/18<br><b>offers [1]</b> 96/14<br><b>office [238]</b><br><b>Office's [6]</b> 39/15<br>90/18 90/25 115/11<br>122/15 181/25<br><b>officer [6]</b> 77/16<br>77/18 83/1 83/2 88/6<br>93/20<br><b>officers [2]</b> 87/22<br>99/21<br><b>offices [6]</b> 39/15 90/3<br>95/23 97/20 105/1<br>126/20<br><b>officially [1]</b> 113/13<br><b>officials [2]</b> 54/13<br>83/22<br><b>often [2]</b> 94/20 166/6<br><b>Oh [1]</b> 12/5<br><b>okay [14]</b> 2/24 3/20<br>4/15 4/16 4/22 8/12<br>15/21 18/7 20/13<br>23/22 25/3 63/24<br>176/22 181/12<br><b>old [3]</b> 109/13 127/23<br>152/25<br><b>omissions [2]</b> 13/7<br>13/10<br><b>on [260]</b><br><b>on' [1]</b> 160/21<br><b>once [8]</b> 4/25 70/23<br>73/22 109/1 151/1<br>153/24 166/4 177/22<br><b>one [62]</b> 5/18 5/24<br>10/21 15/6 20/11 23/5<br>23/16 23/25 24/2 25/5<br>29/20 31/5 32/4 32/15<br>34/11 43/12 44/16<br>49/5 52/3 55/22 57/23<br>57/25 58/2 65/1 65/2<br>66/2 66/19 75/21 77/3<br>78/11 87/2 88/13<br>98/18 102/9 103/10<br>108/15 109/13 111/12<br>113/11 120/12 121/7<br>123/19 124/1 124/3<br>126/20 129/21 136/14<br>137/14 151/10 152/17<br>158/11 161/2 162/19<br>164/5 164/16 171/20   | <b>ones [9]</b> 5/18 105/11<br>105/15 118/1 136/3<br>136/8 152/21 169/23<br>176/17<br><b>online [3]</b> 6/2 7/6<br>7/16<br><b>only [21]</b> 36/11 62/15<br>67/9 70/22 81/10<br>81/17 100/23 103/10<br>111/25 120/12 135/20<br>144/25 145/13 146/21<br>151/9 153/23 157/17<br>158/13 158/19 166/2<br>183/10<br><b>onwards [1]</b> 112/3<br><b>open [8]</b> 22/11 22/11<br>73/3 74/1 122/24<br>150/14 169/20 185/4<br><b>opening [1]</b> 105/4<br><b>operate [3]</b> 43/14<br>80/3 130/8<br><b>operated [3]</b> 103/9<br>128/10 142/12<br><b>operates [1]</b> 87/21<br><b>operating [4]</b> 11/13<br>12/1 34/14 85/15<br><b>operation [4]</b> 113/7<br>130/4 132/14 139/19<br><b>operational [1]</b> 40/16<br><b>operator [2]</b> 22/24<br>23/25<br><b>opined [1]</b> 137/11<br><b>opinion [4]</b> 122/17<br>123/9 123/10 123/11<br><b>opportunities [1]</b><br>71/24<br><b>opportunity [5]</b> 51/17<br>88/24 108/5 161/10<br>176/9<br><b>opposed [1]</b> 77/14<br><b>opposite [3]</b> 61/25<br>137/21 181/8<br><b>opposition [2]</b><br>132/24 161/3<br><b>option [1]</b> 123/16<br><b>options [5]</b> 71/24<br>73/2 73/21 74/1<br>122/23<br><b>or [207]</b><br><b>oral [2]</b> 116/14<br>139/20<br><b>order [5]</b> 7/21 52/4<br>52/9 177/11 179/9<br><b>ordinarily [1]</b> 52/5<br><b>organisation [11]</b><br>73/1 77/5 77/12 78/23<br>81/10 81/18 86/1<br>91/24 92/25 93/16<br>132/12<br><b>organisations [3]</b><br>70/4 72/14 98/15<br><b>organised [1]</b> 109/13   |
| <b>nobody [3]</b> 23/7<br>131/21 136/21<br><b>nodded [1]</b> 38/9<br><b>Noel [5]</b> 3/9 3/23 4/5<br>19/13 33/1<br><b>nominate [1]</b> 108/15<br><b>nominated [2]</b> 115/9<br>147/10<br><b>none [7]</b> 114/1 115/3<br>131/25 134/14 134/21<br>138/12 166/16<br><b>noon [1]</b> 84/11<br><b>nor [1]</b> 158/25<br><b>normal [15]</b> 9/13<br>9/24 13/20 13/23<br>17/11 20/19 21/2<br>25/24 26/13 27/11   | <b>number [28]</b> 1/18<br>13/19 20/17 33/10<br>41/21 42/16 42/16<br>46/9 47/14 51/10<br>51/20 56/23 60/13<br>60/24 65/17 73/2 73/3<br>90/2 90/7 97/16 98/22<br>102/21 107/7 117/21   | <b>oath [1]</b> 4/21<br><b>objected [5]</b> 148/10<br>152/22 162/23 164/9<br>182/20<br><b>objection [3]</b> 2/13<br>2/14 89/10<br><b>objectives [1]</b> 69/10<br><b>obligation [1]</b> 104/15<br><b>obligations [2]</b> 75/3<br>80/18<br><b>observes [1]</b> 79/21<br><b>obsession [1]</b> 146/24<br><b>obstruct [1]</b> 150/19<br><b>obtain [1]</b> 180/8<br><b>obtained [3]</b> 41/25<br>45/15 48/20<br><b>obvious [2]</b> 91/11<br>151/3<br><b>obviously [7]</b> 11/20<br>15/12 26/2 31/15 87/5<br>94/23 114/15<br><b>occasion [25]</b> 1/13<br>1/22 3/16 3/22 4/3 4/9<br>4/12 4/15 4/21 19/10<br>19/14 19/19 19/24<br>20/8 20/12 21/11 22/4<br>25/15 26/22 27/3<br>34/11 40/9 40/20<br>41/14 50/22<br><b>occasionally [1]</b> 70/9<br><b>occasions [8]</b> 51/21<br>57/12 94/17 98/22<br>172/9 173/6 186/8<br>186/19<br><b>occur [2]</b> 6/4 138/23<br><b>occur.' [1]</b> 7/18<br><b>occurred [8]</b> 47/25<br>53/8 63/10 97/5<br>125/23 126/4 150/10<br>169/7<br><b>occurrence [1]</b> 13/21<br><b>occurrence' [3]</b><br>13/23 20/19 33/14<br><b>occurrences [4]</b> 9/24<br>25/24 26/13 55/20<br><b>occurrences' [3]</b><br>21/2 34/10 34/24<br><b>occurrences.' [1]</b><br>9/13<br><b>occurring [2]</b> 129/19<br>132/8<br><b>occurs [2]</b> 127/10<br>162/20 | <b>October [6]</b> 67/14<br>67/19 68/2 74/9<br>173/21 173/22<br><b>odds [1]</b> 29/25<br><b>odds [1]</b> 109/2<br><b>off [11]</b> 120/13<br>128/16 134/4 162/25<br>166/9 166/9 168/4<br>168/9 176/4 176/19<br>180/7<br><b>offer [6]</b> 60/6 60/9<br>75/21 81/11 81/18<br>96/15<br><b>offering [2]</b> 14/4<br>73/18<br><b>offers [1]</b> 96/14<br><b>office [238]</b><br><b>Office's [6]</b> 39/15<br>90/18 90/25 115/11<br>122/15 181/25<br><b>officer [6]</b> 77/16<br>77/18 83/1 83/2 88/6<br>93/20<br><b>officers [2]</b> 87/22<br>99/21<br><b>offices [6]</b> 39/15 90/3<br>95/23 97/20 105/1<br>126/20<br><b>officially [1]</b> 113/13<br><b>officials [2]</b> 54/13<br>83/22<br><b>often [2]</b> 94/20 166/6<br><b>Oh [1]</b> 12/5<br><b>okay [14]</b> 2/24 3/20<br>4/15 4/16 4/22 8/12<br>15/21 18/7 20/13<br>23/22 25/3 63/24<br>176/22 181/12<br><b>old [3]</b> 109/13 127/23<br>152/25<br><b>omissions [2]</b> 13/7<br>13/10<br><b>on [260]</b><br><b>on' [1]</b> 160/21<br><b>once [8]</b> 4/25 70/23<br>73/22 109/1 151/1<br>153/24 166/4 177/22<br><b>one [62]</b> 5/18 5/24<br>10/21 15/6 20/11 23/5<br>23/16 23/25 24/2 25/5<br>29/20 31/5 32/4 32/15<br>34/11 43/12 44/16<br>49/5 52/3 55/22 57/23<br>57/25 58/2 65/1 65/2<br>66/2 66/19 75/21 77/3<br>78/11 87/2 88/13<br>98/18 102/9 103/10<br>108/15 109/13 111/12<br>113/11 120/12 121/7<br>123/19 124/1 124/3<br>126/20 129/21 136/14<br>137/14 151/10 152/17<br>158/11 161/2 162/19<br>164/5 164/16 171/20 | 171/21 179/24 180/11<br>180/14 182/3 184/7<br><b>ones [9]</b> 5/18 105/11<br>105/15 118/1 136/3<br>136/8 152/21 169/23<br>176/17<br><b>online [3]</b> 6/2 7/6<br>7/16<br><b>only [21]</b> 36/11 62/15<br>67/9 70/22 81/10<br>81/17 100/23 103/10<br>111/25 120/12 135/20<br>144/25 145/13 146/21<br>151/9 153/23 157/17<br>158/13 158/19 166/2<br>183/10<br><b>onwards [1]</b> 112/3<br><b>open [8]</b> 22/11 22/11<br>73/3 74/1 122/24<br>150/14 169/20 185/4<br><b>opening [1]</b> 105/4<br><b>operate [3]</b> 43/14<br>80/3 130/8<br><b>operated [3]</b> 103/9<br>128/10 142/12<br><b>operates [1]</b> 87/21<br><b>operating [4]</b> 11/13<br>12/1 34/14 85/15<br><b>operation [4]</b> 113/7<br>130/4 132/14 139/19<br><b>operational [1]</b> 40/16<br><b>operator [2]</b> 22/24<br>23/25<br><b>opined [1]</b> 137/11<br><b>opinion [4]</b> 122/17<br>123/9 123/10 123/11<br><b>opportunities [1]</b><br>71/24<br><b>opportunity [5]</b> 51/17<br>88/24 108/5 161/10<br>176/9<br><b>opposed [1]</b> 77/14<br><b>opposite [3]</b> 61/25<br>137/21 181/8<br><b>opposition [2]</b><br>132/24 161/3<br><b>option [1]</b> 123/16<br><b>options [5]</b> 71/24<br>73/2 73/21 74/1<br>122/23<br><b>or [207]</b><br><b>oral [2]</b> 116/14<br>139/20<br><b>order [5]</b> 7/21 52/4<br>52/9 177/11 179/9<br><b>ordinarily [1]</b> 52/5<br><b>organisation [11]</b><br>73/1 77/5 77/12 78/23<br>81/10 81/18 86/1<br>91/24 92/25 93/16<br>132/12<br><b>organisations [3]</b><br>70/4 72/14 98/15<br><b>organised [1]</b> 109/13 |

**O**  
**original [7]** 11/16  
 21/19 21/20 29/10  
 33/5 136/16 156/5  
**originally [3]** 25/6  
 29/16 155/19  
**other [38]** 34/12 45/3  
 66/20 71/2 72/10  
 72/15 72/24 73/14  
 73/19 73/21 80/18  
 87/2 88/20 94/24  
 94/24 108/11 108/15  
 122/23 123/7 124/13  
 126/21 127/1 131/19  
 139/9 148/12 152/18  
 153/11 154/4 158/25  
 165/3 165/23 166/7  
 166/25 181/24 183/3  
 185/6 185/25 186/13  
**others [9]** 59/25  
 72/12 100/25 102/11  
 123/18 126/15 136/15  
 141/2 181/17  
**otherwise [3]** 181/1  
 182/12 186/7  
**ought [3]** 30/3 64/9  
 168/11  
**our [57]** 1/23 14/8  
 15/8 20/20 21/18  
 36/17 37/8 45/17 47/4  
 48/4 53/13 54/8 54/14  
 54/15 54/16 54/18  
 54/20 54/21 55/2 55/3  
 56/3 56/4 56/6 56/20  
 56/21 62/4 63/14  
 75/20 75/23 81/8  
 81/20 86/15 86/23  
 87/20 89/17 93/6  
 93/11 97/19 97/22  
 98/6 99/11 99/18  
 99/20 103/18 104/6  
 104/9 104/11 108/20  
 115/13 117/13 120/13  
 134/9 138/21 168/18  
 179/3 183/1 185/17  
**ours [3]** 98/24 121/15  
 121/16  
**ourselves [1]** 91/19  
**out [39]** 5/22 9/14  
 16/21 25/18 36/23  
 41/7 48/12 57/6 58/7  
 61/1 64/19 64/24  
 75/11 83/22 89/15  
 90/9 93/9 102/16  
 104/16 105/10 105/15  
 116/8 119/25 120/3  
 122/1 124/12 125/4  
 125/19 126/4 128/22  
 149/4 150/3 150/9  
 154/13 169/4 169/6  
 170/24 177/24 181/18  
**outline [1]** 42/6  
**outlined [1]** 54/20

**outset [1]** 26/3  
**outside [3]** 52/14  
 77/21 112/17  
**outstanding [1]**  
 154/16  
**over [46]** 3/2 5/23 6/5  
 17/9 17/14 17/22 18/5  
 18/12 19/20 23/16  
 23/18 23/18 23/20  
 24/2 29/18 44/6 45/9  
 45/11 46/6 46/9 50/25  
 54/19 56/19 56/23  
 61/2 61/2 70/25 70/25  
 72/10 72/21 73/14  
 78/16 83/25 85/24  
 96/17 96/20 100/13  
 122/21 126/16 150/1  
 162/6 170/19 170/22  
 174/18 174/19 182/13  
**overall [2]** 29/24 81/2  
**overcome [1]** 180/6  
**overcut [1]** 136/6  
**oversaw [1]** 141/14  
**oversee [2]** 40/16  
 48/25  
**overturn [1]** 144/25  
**overview [2]** 142/13  
 144/6  
**own [16]** 16/25 41/11  
 47/6 53/9 91/1 97/12  
 97/13 101/2 110/16  
 133/9 137/12 138/8  
 152/8 155/7 174/17  
 174/17  
**owned [1]** 79/23  
**owners [1]** 77/14

**P**  
**page [85]** 4/23 5/5  
 5/15 6/5 6/5 6/12 6/21  
 7/21 8/13 10/12 10/14  
 10/20 16/7 18/7 21/24  
 23/24 24/1 24/2 24/3  
 24/11 25/4 37/24  
 46/18 67/17 69/8 74/4  
 76/19 78/16 81/1  
 81/24 81/25 85/8  
 85/24 107/9 107/16  
 111/3 115/7 118/9  
 120/24 121/25 124/2  
 126/6 128/19 129/5  
 129/7 129/14 132/20  
 136/24 138/13 138/18  
 141/25 142/25 143/1  
 143/6 144/17 146/12  
 146/13 148/6 153/4  
 153/5 153/21 153/25  
 154/8 154/9 154/14  
 154/15 155/11 156/15  
 158/1 160/2 160/3  
 160/3 161/21 162/6  
 163/5 166/12 166/19  
 171/22 172/13 173/23  
 173/25 174/24 174/25

181/4 185/23  
**page 1 [3]** 7/21 24/11  
 143/1  
**Page 10 [1]** 81/25  
**page 11 [3]** 120/24  
 142/25 143/6  
**page 12 [1]** 138/13  
**page 13 [1]** 138/18  
**page 14 [1]** 37/24  
**page 15 [1]** 148/6  
**page 16 [1]** 153/4  
**page 160 [1]** 5/5  
**page 161 [1]** 6/5  
**page 18 [1]** 141/25  
**page 2 [6]** 6/21 111/3  
 154/8 156/15 160/3  
 173/23  
**page 20 [1]** 146/12  
**page 22 [1]** 121/25  
**page 24 [2]** 107/9  
 166/12  
**page 27 [1]** 155/11  
**page 28 [2]** 153/5  
 171/22  
**page 3 [6]** 6/12 10/20  
 69/8 74/4 160/3  
 174/24  
**page 31 [1]** 181/4  
**page 4 [4]** 115/7  
 118/9 128/19 132/20  
**page 40 [1]** 4/23  
**page 41 [1]** 107/16  
**page 5 [2]** 144/17  
 154/14  
**page 6 [2]** 172/13  
 173/25  
**page 7 [2]** 46/18  
 185/23  
**page 8 [2]** 158/1  
 163/5  
**pages [1]** 37/23  
**pagination [1]** 4/25  
**paid [10]** 41/7 48/23  
 79/1 90/17 90/24  
 109/11 117/2 133/3  
 173/8 186/21  
**panel [2]** 178/8 178/9  
**paper [7]** 96/11  
 172/14 172/15 173/8  
 173/10 173/13 175/20  
**papers [2]** 51/4 167/6  
**paragraph [58]** 6/1  
 7/15 10/8 16/3 16/8  
 24/12 25/5 30/15  
 30/18 32/4 32/19 34/5  
 46/16 46/19 50/17  
 53/12 57/3 69/8 69/9  
 74/18 77/3 79/8 79/9  
 79/11 79/15 80/12  
 81/25 86/11 86/21  
 90/11 92/3 92/11  
 107/10 107/18 111/4  
 111/4 113/1 118/9  
 118/20 119/24 120/24

127/10 128/19 129/6  
 130/9 132/21 141/25  
 146/13 148/7 153/8  
 155/12 156/17 158/3  
 166/12 171/22 172/4  
 181/13 185/23  
**paragraph 101 [1]**  
 155/12  
**paragraph 108 [1]**  
 153/8  
**paragraph 11 [1]**  
 92/11  
**paragraph 1120 [1]**  
 90/11  
**paragraph 119 [1]**  
 181/13  
**paragraph 12 [1]**  
 185/23  
**paragraph 15 [4]**  
 118/9 118/20 128/19  
 132/21  
**paragraph 157 [1]**  
 107/18  
**paragraph 2 [2]** 77/3  
 127/10  
**paragraph 3 [1]** 10/8  
**paragraph 33 [5]**  
 46/16 46/19 50/17  
 53/12 57/3  
**paragraph 47 [1]**  
 120/24  
**paragraph 5 [2]**  
 111/4 111/4  
**paragraph 55 [1]**  
 148/7  
**paragraph 6 [2]** 79/8  
 79/9  
**Paragraph 6's [1]**  
 80/12  
**paragraph 66 [1]**  
 141/25  
**paragraph 6c [1]**  
 79/11  
**paragraph 7 [1]** 92/3  
**paragraph 76 [1]**  
 146/13  
**paragraph 8b [1]**  
 69/8  
**paragraph 9 [1]**  
 113/1  
**paragraph 91 [2]**  
 107/10 166/12  
**paragraphs [12]** 5/22  
 9/5 10/4 10/21 11/8  
 11/9 13/1 18/8 20/14  
 29/19 107/15 147/11  
**paragraphs 91 [1]**  
 107/15  
**pardon [1]** 136/5  
**Parsons [5]** 142/5  
 142/6 142/13 143/8  
 143/25  
**Parsons' [1]** 143/10  
**part [23]** 4/11 7/13

8/4 16/24 25/8 79/8  
 82/7 83/6 90/6 90/9  
 100/15 100/16 113/21  
 130/25 141/17 143/8  
 162/23 171/11 173/12  
 175/1 175/2 183/24  
 187/3  
**Participants [1]**  
 185/6  
**participate [1]** 165/6  
**participating [3]**  
 155/14 165/23 166/1  
**particular [7]** 75/2  
 77/15 122/22 126/24  
 137/6 161/4 183/24  
**particularly [7]** 60/20  
 135/6 137/8 138/21  
 149/1 160/24 168/18  
**parties [3]** 162/2  
 162/4 163/8  
**parties' [1]** 86/4  
**partly [4]** 5/1 48/25  
 93/5 93/7  
**partner [5]** 73/18  
 108/17 110/2 111/9  
 112/6  
**partners [1]** 73/4  
**partnership [2]** 72/21  
 91/23  
**parts [3]** 117/18  
 139/9 144/11  
**partway [1]** 5/2  
**party [2]** 158/25  
 160/13  
**passed [2]** 6/6 99/20  
**passing [2]** 148/16  
 171/18  
**past [3]** 103/24 134/7  
 145/20  
**Paul [4]** 13/17 37/11  
 37/16 188/6  
**Paula [19]** 118/22  
 118/25 119/3 128/17  
 129/2 131/20 132/23  
 133/12 133/21 134/6  
 134/11 166/17 166/21  
 167/8 167/16 168/8  
 169/2 169/13 169/15  
**pause [5]** 85/17  
 88/13 88/15 170/14  
 184/6  
**pausing [9]** 46/23  
 74/13 82/8 114/15  
 127/3 129/23 131/2  
 150/4 156/23  
**pay [10]** 75/15 87/3  
 87/3 92/13 92/19  
 108/5 108/12 136/18  
 143/19 167/14  
**paying [1]** 133/7  
**payment [1]** 79/4  
**pays [1]** 179/15  
**peers [1]** 82/6  
**pen [1]** 127/23

|          |   |  |   |   |
|----------|---|--|---|---|
| <b>P</b> | 56/5 66/17 73/2 93/1<br>93/11 127/8 132/9<br>152/5 167/11 | 151/25 152/22 153/4<br>153/17 153/25 154/7<br>154/9 154/14 155/11<br>156/13 158/1 160/1<br>160/3 163/3 163/5<br>163/25 166/11 166/19<br>171/22 171/23 172/11<br>172/13 173/23 174/23<br>174/24 177/6 | <b>POL00098418 [1]</b><br>129/4<br><b>POL00099063 [2]</b><br>121/25 136/24<br><b>POL00101367 [1]</b><br>167/16<br><b>police [1]</b> 144/22<br><b>policies [1]</b> 50/10<br><b>policy [4]</b> 51/9<br>153/16 179/14 179/15<br><b>political [1]</b> 85/17<br><b>poor [7]</b> 17/10 27/10<br>31/4 31/7 31/12 31/14<br>31/17<br><b>portion [1]</b> 179/20<br><b>posed [2]</b> 105/25<br>175/7<br><b>position [18]</b> 3/20<br>14/20 45/18 52/19<br>59/16 60/1 79/2 86/12<br>86/15 88/5 88/22<br>89/23 92/9 93/17<br>162/13 168/19 177/19<br>179/3<br><b>positive [1]</b> 140/21<br><b>possession [3]</b> 3/13<br>20/4 73/5<br><b>possibility [1]</b> 71/3<br><b>possible [10]</b> 54/1<br>56/15 70/14 72/21<br>74/21 124/10 129/8<br>133/3 139/4 143/11<br><b>possibly [5]</b> 52/9<br>59/12 109/24 141/2<br>183/15<br><b>post [227]</b><br><b>post-Horizon [1]</b><br>52/23<br><b>postal [12]</b> 40/6<br>82/25 83/2 83/13<br>83/24 83/25 87/22<br>87/23 97/21 98/7<br>101/21 102/6<br><b>posted [1]</b> 172/20<br><b>postmaster [1]</b> 27/25<br><b>postmaster's [2]</b><br>17/12 27/12<br><b>postmasters [9]</b><br>67/18 67/21 68/4 75/4<br>81/11 85/15 85/22<br>86/1 93/20<br><b>postmistress [1]</b><br>111/8<br><b>potential [3]</b> 75/21<br>79/21 178/10<br><b>potentially [10]</b> 13/21<br>13/23 20/19 33/14<br>33/17 33/19 34/1 35/7<br>72/24 172/17<br><b>pounds [3]</b> 52/9<br>52/10 174/18<br><b>power [5]</b> 144/24<br>145/1 159/1 165/14<br>179/12 | <b>practice [4]</b> 45/3<br>58/25 110/17 155/12<br><b>practitioners [1]</b><br>110/10<br><b>prayed [1]</b> 80/5<br><b>pre [2]</b> 52/23 155/9<br><b>pre-2012 [1]</b> 155/9<br><b>preceded [1]</b> 17/18<br><b>preceding [1]</b> 69/9<br><b>precise [1]</b> 174/7<br><b>precisely [2]</b> 115/21<br>142/14<br><b>predominantly [5]</b><br>44/10 59/22 78/25<br>105/1 105/3<br><b>prefer [2]</b> 185/14<br>185/16<br><b>preference [1]</b> 72/2<br><b>preferred [2]</b> 73/17<br>113/12<br><b>preliminary [2]</b><br>136/25 137/7<br><b>prepared [6]</b> 4/4<br>117/1 149/16 149/19<br>178/24 179/20<br><b>preparing [3]</b> 96/13<br>119/21 149/15<br><b>present [2]</b> 132/1<br>171/3<br><b>presentation [3]</b><br>143/3 143/9 143/10<br><b>presentations [1]</b><br>142/4<br><b>presented [1]</b> 183/17<br><b>presenting [1]</b><br>143/18<br><b>preserved [1]</b> 153/12<br><b>press [1]</b> 94/21<br><b>pressed [1]</b> 130/12<br><b>pressing [1]</b> 120/6<br><b>pressure [2]</b> 135/6<br>135/7<br><b>presumably [8]</b><br>56/18 71/17 74/21<br>80/16 119/19 155/5<br>163/19 170/8<br><b>pretending [1]</b> 24/8<br><b>pretty [4]</b> 18/24<br>143/17 161/20 170/10<br><b>prevented [1]</b> 171/4<br><b>previous [11]</b> 1/22<br>5/25 10/11 31/24<br>45/24 56/22 149/6<br>152/14 155/2 159/3<br>164/24<br><b>previously [14]</b> 9/8<br>13/20 13/25 18/8<br>20/18 33/13 39/3<br>58/24 151/24 160/19<br>162/21 164/5 164/16<br>164/18<br><b>primarily [1]</b> 181/17<br><b>primary [2]</b> 39/7<br>134/5 |
|----------|---|--|---|---|

|          |   |   |  |  |
|----------|---|---|--|--|
| <b>P</b> | 165/25 166/2 177/17<br>179/1 183/2 184/18<br><b>processed [2]</b> 6/2<br>7/16<br><b>processes [3]</b> 92/12<br>99/13 122/6<br><b>processing [2]</b> 121/6<br>159/16<br><b>produce [8]</b> 16/5<br>24/17 24/19 47/19<br>128/7 156/19 157/12<br>173/8<br><b>produced [18]</b> 6/15<br>11/11 12/9 21/1 24/19<br>29/17 34/9 34/22<br>35/18 107/2 116/13<br>119/7 135/11 135/12<br>145/16 159/16 178/4<br>184/13<br><b>produces [1]</b> 15/10<br><b>producing [2]</b> 135/14<br>148/2<br><b>profession [2]</b> 110/7<br>110/13<br><b>profit [2]</b> 174/19<br>175/22<br><b>profitable [1]</b> 134/8<br><b>programme [1]</b> 50/16<br><b>programming [1]</b><br>131/8<br><b>progress [2]</b> 147/22<br>175/4<br><b>prohibition [1]</b> 79/22<br><b>project [3]</b> 41/5<br>42/10 146/21<br><b>projects [1]</b> 70/11<br><b>promote [1]</b> 39/8<br><b>prompted [2]</b> 98/18<br>129/24<br><b>proper [2]</b> 133/6<br>157/20<br><b>properly [5]</b> 11/13<br>12/1 32/18 56/2 148/4<br><b>proportion [1]</b><br>178/24<br><b>proposal [9]</b> 78/14<br>89/4 114/9 114/10<br>114/11 114/19 116/4<br>116/6 134/10<br><b>propose [1]</b> 165/2<br><b>proposed [3]</b> 4/3<br>76/23 79/24<br><b>proposing [1]</b> 17/19<br><b>prosecute [1]</b> 62/20<br><b>prosecuted [16]</b><br>53/14 53/24 54/4 54/9<br>54/19 56/4 58/5 59/4<br>62/1 63/21 63/25<br>84/20 99/8 130/25<br>131/22 159/21<br><b>prosecuting [3]</b> 59/1<br>110/6 110/7<br><b>prosecution [18]</b> 4/5<br>19/2 19/13 28/6 28/9 | 28/17 28/19 28/22<br>33/1 53/18 54/18<br>131/15 144/19 144/23<br>145/4 171/7 171/9<br>181/2<br><b>prosecutions [34]</b><br>15/9 60/14 60/24<br>61/14 62/13 62/14<br>64/4 64/8 64/11 64/14<br>64/17 64/19 64/23<br>96/1 96/3 96/6 96/11<br>96/16 96/21 96/25<br>97/13 100/3 126/2<br>130/11 130/18 131/16<br>131/17 131/19 133/11<br>133/15 133/22 134/1<br>134/12 171/15<br><b>prospect [1]</b> 177/7<br><b>protect [2]</b> 77/12<br>79/17<br><b>protecting [3]</b> 77/22<br>77/23 77/23<br><b>protection [1]</b> 126/8<br><b>protest [1]</b> 93/11<br><b>prove [3]</b> 56/1 134/2<br>180/2<br><b>proved [1]</b> 143/20<br><b>proven [3]</b> 103/17<br>127/14 143/25<br><b>provide [14]</b> 50/3<br>78/2 78/14 78/18 96/3<br>104/4 104/11 122/21<br>147/2 158/5 162/10<br>172/5 173/19 177/18<br><b>provided [10]</b> 9/8<br>37/20 46/20 49/9<br>56/23 81/5 156/21<br>173/13 175/9 181/9<br><b>provides [1]</b> 29/23<br><b>providing [4]</b> 7/5<br>36/5 91/20 108/22<br><b>proving [1]</b> 164/13<br><b>provisions [1]</b> 81/4<br><b>prudent [1]</b> 71/23<br><b>public [9]</b> 1/24 84/23<br>91/21 97/9 97/10<br>100/15 133/5 176/25<br>179/6<br><b>publication [1]</b> 140/9<br><b>publicly [1]</b> 79/23<br><b>published [9]</b> 107/25<br>122/11 133/9 134/17<br>134/25 135/1 135/23<br>135/24 176/24<br><b>publishing [1]</b><br>122/10<br><b>pull [1]</b> 139/16<br><b>purpose [20]</b> 4/5<br>11/7 77/11 89/13<br>114/7 114/7 114/8<br>129/17 132/6 134/7<br>135/2 135/14 149/4<br>149/25 150/2 159/9<br>159/13 159/13 179/13 | 180/21<br><b>purposes [2]</b> 75/10<br>92/6<br><b>pursue [1]</b> 178/22<br><b>pursuing [2]</b> 32/18<br>124/8<br><b>push [1]</b> 122/24<br><b>put [36]</b> 1/25 2/6 2/8<br>2/12 4/13 7/6 7/19<br>15/12 22/21 26/2 26/5<br>26/15 27/2 31/2 31/3<br>31/21 52/3 59/11<br>88/17 99/25 114/9<br>114/11 115/4 123/21<br>128/16 131/9 134/11<br>138/5 141/11 144/21<br>177/12 179/3 179/14<br>180/4 180/8 181/14<br><b>putting [3]</b> 26/8<br>131/3 178/9  | <b>quickly [2]</b> 63/10<br>87/1<br><b>quiet [1]</b> 122/18<br><b>quite [13]</b> 98/22<br>102/5 118/16 124/25<br>125/5 126/11 137/21<br>138/4 143/13 143/22<br>159/7 166/14 180/5<br><b>quoted [1]</b> 94/20 |
|          |   |   | <b>R</b>   |  |
|          |   |   | <b>rack [1]</b> 19/3<br><b>raise [1]</b> 87/16<br><b>raised [14]</b> 40/22<br>62/7 85/16 96/8 101/3<br>114/23 116/11 117/20<br>145/11 148/23 153/6<br>163/17 171/21 171/24<br><b>raises [1]</b> 160/18<br><b>raising [5]</b> 62/25 82/3<br>83/10 96/18 101/8<br><b>random [1]</b> 23/25<br><b>range [1]</b> 5/7<br><b>rather [11]</b> 4/19<br>29/25 32/15 35/1 35/4<br>58/22 78/12 81/12<br>98/14 119/3 165/10<br><b>ratified [1]</b> 80/6<br><b>re [3]</b> 1/10 185/3<br>188/2<br><b>re-examination [1]</b><br>185/3<br><b>re-sworn [2]</b> 1/10<br>188/2<br><b>reach [4]</b> 101/12<br>137/10 162/5 178/8<br><b>reach/go [1]</b> 101/12<br><b>reached [3]</b> 62/2 81/2<br>122/7<br><b>reaching [2]</b> 75/11<br>81/14<br><b>reacting [1]</b> 140/20<br><b>reaction [1]</b> 182/7<br><b>read [15]</b> 5/4 12/19<br>20/14 25/6 29/10<br>32/19 33/9 71/17<br>78/12 80/16 85/24<br>86/11 90/9 131/10<br>187/19<br><b>reading [6]</b> 4/10<br>15/25 62/14 62/15<br>81/12 175/25<br><b>reads [8]</b> 15/1 46/19<br>71/22 74/7 74/18<br>76/21 78/17 86/21<br><b>real [1]</b> 111/20<br><b>reality [2]</b> 45/22<br>132/24<br><b>really [24]</b> 14/23<br>15/13 17/10 18/25<br>19/7 26/9 27/10 27/18<br>30/14 31/18 32/2 32/3<br>32/11 32/13 36/8<br>48/21 54/23 74/2 |  |

|          |   |   |  |  |
|----------|---|---|--|--|
| <b>R</b> | 116/1 116/3 118/4<br>120/8 125/13 125/14<br>127/6 133/20 142/9<br>143/13 143/24 148/13<br>170/15 170/17 | 137/4 146/14 150/5<br><b>refer</b> [1] 10/24<br><b>reference</b> [25] 72/5<br>74/21 79/25 85/11<br>107/7 109/16 148/10<br>148/22 148/25 149/6<br>149/7 149/11 149/14<br>149/19 149/24 151/22<br>152/1 152/3 152/6<br>152/10 152/13 154/16<br>156/6 185/21 187/9 | 53/17 60/13 98/6<br>110/19<br><b>relation</b> [10] 3/25 5/7<br>5/17 19/1 88/22 92/22<br>93/25 94/14 172/7<br>186/15<br><b>relations</b> [1] 43/25<br><b>relationship</b> [8]<br>45/12 54/13 69/25<br>74/6 74/10 76/20 81/8<br>125/3<br><b>released</b> [6] 89/12<br>106/5 119/11 135/4<br>135/5 139/13<br><b>releasing</b> [1] 135/3<br><b>relevance</b> [1] 38/20<br><b>relevant</b> [10] 19/9<br>38/24 90/9 99/5 99/17<br>101/9 154/4 155/9<br>158/17 172/17<br><b>reliability</b> [1] 13/2<br><b>reliable</b> [1] 15/10<br><b>reliance</b> [1] 84/20<br><b>reliant</b> [1] 53/4<br><b>relied</b> [1] 131/14<br><b>rely</b> [1] 2/7<br><b>relying</b> [2] 42/19 63/2<br><b>Remaining</b> [1] 16/3<br><b>remains</b> [4] 49/20<br>49/23 79/23 123/11<br><b>remediation</b> [1]<br>141/12<br><b>remedies</b> [1] 143/11<br><b>remember</b> [16] 1/15<br>11/1 18/22 30/14<br>32/14 57/23 131/3<br>131/5 138/4 141/15<br>167/10 167/20 171/6<br>174/14 174/15 177/17<br><b>remind</b> [6] 1/19 2/5<br>4/9 104/15 118/11<br>175/20<br><b>reminder</b> [1] 129/16<br><b>remit</b> [6] 77/21 82/7<br>83/11 122/2 122/3<br>152/15<br><b>remote</b> [2] 36/16<br>138/16<br><b>remotely</b> [2] 2/16<br>139/1<br><b>removal</b> [1] 74/11<br><b>remove</b> [3] 28/24<br>34/2 114/21<br><b>removed</b> [8] 12/7<br>12/7 26/5 27/1 28/21<br>31/6 36/6 74/14<br><b>remunerate</b> [1] 67/3<br><b>rep</b> [18] 43/21 43/21<br>43/22 44/5 44/5 44/8<br>49/18 50/13 55/16<br>55/17 55/21 57/16<br>57/16 57/17 63/2<br>63/25 101/19 103/13<br><b>repeat</b> [1] 31/19 | <b>repeatedly</b> [1] 187/15<br><b>repeating</b> [1] 101/17<br><b>rephrase</b> [3] 128/1<br>131/18 142/19<br><b>replace</b> [2] 15/20<br>148/25<br><b>replaced</b> [2] 150/6<br>150/18<br><b>replicate</b> [1] 121/5<br><b>replied</b> [1] 153/13<br><b>reply</b> [1] 7/23<br><b>report</b> [47] 71/10<br>71/15 71/20 81/4<br>82/10 85/2 85/3 85/20<br>87/5 87/15 114/16<br>114/18 119/7 119/9<br>119/11 121/24 122/1<br>122/10 127/24 128/15<br>128/22 134/17 134/19<br>134/25 135/3 135/9<br>135/22 136/23 137/22<br>138/11 139/1 139/13<br>139/17 139/21 139/22<br>139/24 140/10 140/13<br>140/21 148/11 148/12<br>155/23 156/8 160/7<br>175/1 175/2 184/13<br><b>reported</b> [5] 41/15<br>41/17 61/22 85/10<br>175/8<br><b>reporting</b> [2] 41/22<br>96/22<br><b>represent</b> [16] 50/14<br>65/10 66/5 68/3 69/20<br>69/20 70/7 75/7 75/24<br>76/2 79/18 90/2 91/13<br>91/18 92/24 93/15<br><b>representation</b> [14]<br>43/22 46/12 46/21<br>49/9 60/7 65/8 70/11<br>76/6 76/17 81/11<br>81/18 96/4 112/25<br>178/1<br><b>representative</b> [10]<br>47/12 63/14 71/2<br>76/12 88/20 91/3 91/7<br>91/10 91/23 92/21<br><b>representatives</b> [15]<br>42/25 43/14 50/2<br>62/16 63/22 78/9 84/7<br>88/10 99/18 99/22<br>100/2 106/4 127/19<br>134/22 140/9<br><b>represented</b> [7] 57/5<br>59/3 75/4 82/15 101/6<br>103/14 185/2<br><b>representing</b> [7]<br>46/24 48/10 56/13<br>59/5 65/24 66/1 68/21<br><b>represents</b> [2] 48/24<br>81/6<br><b>reps</b> [26] 43/9 44/14<br>44/18 44/19 44/20<br>45/2 45/6 49/20 49/21 |
|----------|---|---|--|--|

|                              |                               |                               |                             |                               |
|------------------------------|-------------------------------|-------------------------------|-----------------------------|-------------------------------|
| <b>R</b>                     | <b>restrict [1]</b> 148/14    | 60/17 60/19 61/15             | 7/10 11/1 13/24 17/21       | 102/15 103/7 108/4            |
| <b>reps... [17]</b> 49/21    | <b>restricted [3]</b> 92/25   | 62/6 62/21 65/11              | 18/9 19/24 26/3 27/4        | 111/5 111/22 112/2            |
| 49/22 50/9 54/12             | 93/13 121/16                  | 66/10 69/3 69/6 70/11         | 28/2 28/11 29/11            | 112/6 113/2 113/9             |
| 54/14 54/14 54/16            | <b>result [3]</b> 126/19      | 84/21 87/12 93/18             | 29/16 31/2 31/8 31/19       | 114/3 114/10 115/7            |
| 54/20 54/21 55/2 56/4        | 156/18 182/14                 | 93/24 94/2 94/18              | 31/24 33/18 35/10           | 117/12 118/22 120/25          |
| 62/4 99/11 99/16             | <b>resulting [1]</b> 126/22   | 100/7 102/14 105/22           | 35/23 36/2 41/14            | 121/2 124/6 126/19            |
| 104/9 104/12 104/13          | <b>resume [3]</b> 36/25       | 106/13 107/5 108/6            | 41/20 47/6 50/24            | 126/25 127/11 128/9           |
| <b>reputation [2]</b> 90/19  | 106/11 146/1                  | 112/8 118/16 126/9            | 54/16 54/23 55/5            | 130/9 131/2 133/4             |
| 90/25                        | <b>resworn [1]</b> 1/8        | 156/10 160/13 166/14          | 58/25 59/17 61/21           | 136/8 136/13 137/16           |
| <b>request [6]</b> 5/8 56/9  | <b>Retail [3]</b> 72/3 72/12  | 167/18 176/14 176/25          | 61/25 61/25 63/25           | 137/18 139/16 139/25          |
| 56/11 88/16 109/2            | 73/7                          | 181/11 184/8                  | 69/17 70/9 76/15            | 140/16 140/18 140/19          |
| 173/16                       | <b>retain [3]</b> 53/17 53/22 | <b>right-hand [3]</b> 4/24    | 84/17 85/9 87/19            | 142/1 142/2 143/21            |
| <b>requested [2]</b> 128/24  | 153/1                         | 23/9 23/11                    | 90/10 91/6 96/2 96/4        | 146/2 146/18 147/24           |
| 134/13                       | <b>retention [1]</b> 152/19   | <b>rightly [2]</b> 126/19     | 98/17 98/21 101/5           | 148/8 152/16 152/22           |
| <b>requests [3]</b> 5/10     | <b>retiring [2]</b> 155/13    | 142/1                         | 104/11 115/20 115/25        | 152/24 153/3 153/9            |
| 12/7 123/25                  | 155/14                        | <b>rights [1]</b> 70/6        | 125/13 128/15 133/20        | 155/10 155/24 157/10          |
| <b>require [2]</b> 5/16      | <b>return [2]</b> 74/19       | <b>rise [1]</b> 61/14         | 136/6 137/18 137/23         | 167/2 168/8 169/11            |
| 177/18                       | 89/14                         | <b>risk [2]</b> 2/1 79/20     | 139/11 140/3 143/12         | 169/13 170/23 171/8           |
| <b>required [5]</b> 83/19    | <b>returning [1]</b> 36/19    | <b>risk' [1]</b> 80/6         | 143/14 143/22 143/25        | 172/1 172/4 172/15            |
| 123/5 131/25 152/10          | <b>revealed [2]</b> 14/21     | <b>Robinson [1]</b> 182/9     | 150/24 155/2 156/9          | 173/13 173/22 176/19          |
| 152/19                       | 146/21                        | <b>robust [1]</b> 86/15       | 159/19 159/22 164/15        | 179/6 179/17 181/13           |
| <b>requiring [1]</b> 158/11  | <b>revealing [2]</b> 35/15    | <b>role [18]</b> 39/7 39/21   | 165/4 168/8 169/19          | 183/10                        |
| <b>research [3]</b> 56/20    | 151/16                        | 40/10 45/8 45/13              | 170/3 170/4 170/16          | <b>saying [27]</b> 9/23 10/1  |
| 56/21 137/13                 | <b>reveals [1]</b> 34/13      | 45/14 46/7 46/10 49/2         | 170/17 170/19 171/10        | 14/5 30/22 32/5 35/5          |
| <b>researching [1]</b>       | <b>Revenue [2]</b> 110/5      | 56/22 61/18 62/24             | 171/11 171/21 172/8         | 35/20 48/5 51/18 56/8         |
| 177/3                        | 131/23                        | 83/15 96/23 157/21            | <b>sales [1]</b> 127/22     | 58/16 62/10 63/1 64/2         |
| <b>resign [2]</b> 57/8 58/22 | <b>Revenue's [1]</b> 110/6    | 158/13 164/2 164/22           | <b>salient [1]</b> 76/25    | 64/25 82/10 86/15             |
| <b>resigned [1]</b> 58/4     | <b>revenues [1]</b> 78/5      | <b>roles [2]</b> 39/2 69/1    | <b>Sam [1]</b> 90/1         | 96/10 111/9 116/9             |
| <b>resigning [1]</b> 64/22   | <b>reverse [1]</b> 144/25     | <b>roll [1]</b> 170/19        | <b>same [20]</b> 9/15 10/17 | 137/19 138/19 154/25          |
| <b>resolution [4]</b> 80/19  | <b>review [22]</b> 26/19      | <b>rolled [5]</b> 48/12 58/7  | 20/11 20/12 21/25           | 171/6 181/22 184/4            |
| 158/11 159/15 162/5          | 29/1 79/10 88/22              | 61/1 158/24 170/22            | 49/20 52/19 61/5            | 187/15                        |
| <b>resolve [2]</b> 114/13    | 88/24 89/2 89/5               | <b>rolling [1]</b> 135/18     | 63/20 68/1 69/21            | <b>says [45]</b> 8/14 9/3 9/9 |
| 114/22                       | 115/11 116/7 120/2            | <b>rollout [2]</b> 40/17 64/7 | 69/22 121/5 129/3           | 12/13 14/8 15/4 24/15         |
| <b>resolved [1]</b> 55/6     | 120/6 120/10 122/13           | <b>Ron [14]</b> 112/19        | 142/18 156/13 168/2         | 26/16 32/4 61/5 79/11         |
| <b>resolving [1]</b> 159/11  | 122/16 138/13 144/6           | 114/3 115/2 121/14            | 182/18 184/19 184/21        | 80/12 86/8 92/11              |
| <b>RespCd [1]</b> 29/21      | 148/11 154/15 156/19          | 124/22 125/5 126/7            | <b>sample [1]</b> 136/11    | 117/14 117/17 119/24          |
| <b>respect [4]</b> 2/6 93/7  | 156/21 157/9 159/19           | 138/6 139/7 139/12            | <b>satisfaction [2]</b>     | 122/2 122/2 124/21            |
| 108/12 183/20                | <b>reviewed [5]</b> 154/12    | 141/1 150/11 173/1            | 100/17 160/19               | 126/14 127/7 129/7            |
| <b>respond [1]</b> 181/15    | 154/13 155/8 156/7            | 175/18                        | <b>satisfied [4]</b> 115/13 | 129/16 132/21 144/20          |
| <b>responded [1]</b> 81/22   | 159/22                        | <b>Ronald [1]</b> 119/17      | 116/17 125/18 125/20        | 148/22 149/22 151/10          |
| <b>responding [2]</b>        | <b>reviewing [5]</b> 26/4     | <b>room [5]</b> 59/21         | <b>satisfy [1]</b> 115/20   | 152/1 153/25 154/20           |
| 126/11 149/23                | 26/6 26/7 27/16 31/4          | 155/16 155/17 165/5           | <b>save [1]</b> 38/23       | 155/17 156/17 157/3           |
| <b>response [10]</b> 8/16    | <b>reviews [11]</b> 115/19    | 165/11                        | <b>saw [6]</b> 103/10       | 157/25 158/4 160/9            |
| 9/15 10/14 29/12             | 116/1 116/2 120/1             | <b>roughly [2]</b> 113/20     | 118/11 121/17 122/12        | 160/17 161/21 162/6           |
| 29/21 30/11 32/4 83/7        | 120/7 120/11 120/14           | 167/20                        | 167/19 181/21               | 163/7 163/19 168/15           |
| 140/2 174/2                  | 120/16 130/7 130/23           | <b>round [3]</b> 27/22        | <b>say [127]</b> 5/15 11/12 | 170/7                         |
| <b>responses [2]</b> 24/22   | 135/15                        | 117/3 137/13                  | 11/25 14/7 14/24            | <b>scale [3]</b> 45/2 102/5   |
| 115/14                       | <b>revised [1]</b> 152/2      | <b>rounding [1]</b> 180/7     | 17/19 18/10 30/13           | 126/21                        |
| <b>responsibilities [6]</b>  | <b>revisions [1]</b> 9/4      | <b>Royal [11]</b> 65/22 84/1  | 31/7 32/12 33/7 33/12       | <b>scandal [2]</b> 81/23      |
| 39/3 48/18 83/7 83/22        | <b>revisit [2]</b> 38/23 40/8 | 91/20 93/3 93/8 154/3         | 33/19 34/21 35/9            | 95/15                         |
| 97/18 97/18                  | <b>reworked [1]</b> 152/3     | 154/22 154/22 155/3           | 39/17 39/24 42/12           | <b>Scarborough [1]</b>        |
| <b>responsibility [19]</b>   | <b>rewritten [1]</b> 47/14    | 155/4 155/5                   | 42/14 42/19 43/5 49/4       | 166/9                         |
| 39/8 39/25 40/5 40/12        | <b>right [73]</b> 1/20 1/24   | <b>Rudkin [1]</b> 138/15      | 50/17 51/9 52/19            | <b>scenes [2]</b> 108/6       |
| 41/11 45/9 45/12             | 2/23 3/18 4/24 6/9            | <b>rule [5]</b> 2/14 83/23    | 53/12 54/2 56/3 57/3        | 146/24                        |
| 48/22 72/17 87/20            | 12/5 18/1 20/24 22/16         | 87/20 97/22 185/3             | 58/10 58/17 58/20           | <b>scheduled [1]</b> 71/12    |
| 87/21 87/22 94/9             | 23/7 23/9 23/11 24/14         | <b>rules [3]</b> 59/23 113/3  | 61/4 61/5 61/10 61/13       | <b>scheme [31]</b> 86/22      |
| 97/22 98/10 98/11            | 24/25 33/25 34/7              | 166/5                         | 62/11 62/18 63/16           | 114/15 140/7 140/23           |
| 98/23 99/4 101/18            | 34/16 34/16 36/18             | <b>run [4]</b> 5/4 50/6       | 66/8 66/11 69/1 69/7        | 141/9 141/14 141/18           |
| <b>responsible [8]</b> 61/6  | 36/24 38/10 39/5              | 159/16 181/18                 | 69/10 70/2 72/9 72/16       | 141/19 142/21 144/7           |
| 65/19 65/20 65/24            | 39/10 39/15 39/19             | <b>running [1]</b> 102/4      | 72/19 73/17 75/12           | 144/18 144/21 145/2           |
| 66/1 82/20 98/3 148/1        | 39/22 40/2 40/13              | <b>runs [1]</b> 37/23         | 75/14 75/23 80/8            | 146/11 147/17 147/20          |
| <b>rest [3]</b> 16/13 25/14  | 40/23 41/1 41/9 41/24         |                               | 81/25 87/25 88/4            | 151/17 156/17 159/16          |
| 97/20                        | 46/3 49/4 49/15 58/3          | <b>S</b>                      | 90/14 92/3 97/3 98/12       | 162/21 165/13 166/4           |
|                              | 58/10 58/17 60/2              | <b>said [81]</b> 4/9 4/15     | 98/16 99/12 100/14          | 166/5 176/10 177/22           |



| S  |  |   |  |  |
|--|--|---|--|--|
| <p><b>scheme... [6]</b> 178/3<br/>180/10 180/12 180/21<br/>180/23 181/7</p> <p><b>schools [1]</b> 50/6</p> <p><b>scope [3]</b> 72/13<br/>117/13 148/23</p> <p><b>screen [5]</b> 21/21<br/>46/17 107/10 146/12<br/>166/16</p> <p><b>screens [1]</b> 36/23</p> <p><b>scroll [22]</b> 4/19 4/25<br/>5/14 6/22 7/22 9/3 9/9<br/>13/13 13/14 15/25<br/>16/1 20/9 21/6 22/13<br/>23/20 23/24 33/6<br/>67/19 79/7 81/3<br/>148/20 163/25</p> <p><b>scrolling [1]</b> 24/25</p> <p><b>Sea [1]</b> 166/9</p> <p><b>search [1]</b> 94/18</p> <p><b>second [83]</b> 16/3<br/>16/4 16/7 22/24 23/24<br/>24/12 25/4 25/4 31/5<br/>34/5 37/20 46/16<br/>74/18 76/19 77/25<br/>78/16 85/20 86/11<br/>112/20 114/17 115/8<br/>116/4 116/17 116/19<br/>116/22 117/10 117/17<br/>117/17 117/19 117/23<br/>118/1 119/24 120/9<br/>121/11 122/13 123/20<br/>124/15 127/19 128/3<br/>129/19 130/23 134/20<br/>134/23 135/2 135/9<br/>135/23 136/1 136/12<br/>136/16 136/20 137/10<br/>142/3 150/17 153/21<br/>155/22 155/23 155/23<br/>156/7 156/8 156/8<br/>156/18 157/7 157/10<br/>157/12 158/6 158/14<br/>158/20 160/7 161/12<br/>162/15 164/3 164/11<br/>164/21 164/23 166/13<br/>166/14 173/18 173/18<br/>173/25 174/6 174/7<br/>175/1 175/11</p> <p><b>Secondly [1]</b> 149/3</p> <p><b>secrecy [1]</b> 146/24</p> <p><b>secretarial [1]</b> 147/2</p> <p><b>secretariat [1]</b> 147/6</p> <p><b>Secretaries [1]</b> 83/24</p> <p><b>secretary [29]</b> 39/4<br/>39/18 40/1 40/12 45/9<br/>45/13 45/14 50/24<br/>57/14 57/15 61/19<br/>61/20 62/24 65/9 70/3<br/>70/18 70/21 83/12<br/>83/13 83/15 83/16<br/>83/24 89/24 93/19<br/>94/3 98/8 113/15</p> | <p>146/15 147/13</p> <p><b>section [11]</b> 67/22<br/>68/1 68/3 68/12 68/23<br/>75/20 87/13 99/5<br/>99/17 152/9 153/6</p> <p><b>Section 8 [1]</b> 152/9</p> <p><b>sections [1]</b> 97/16</p> <p><b>Security [1]</b> 3/18</p> <p><b>see [84]</b> 1/3 1/5 4/14<br/>4/18 6/22 7/1 7/11<br/>7/22 9/16 10/19 10/21<br/>12/6 14/7 15/5 15/15<br/>16/8 16/24 17/3 18/8<br/>21/3 21/6 21/20 21/23<br/>22/2 22/4 22/19 22/22<br/>22/23 22/25 23/2 23/5<br/>23/9 23/13 23/21<br/>26/15 26/25 27/8<br/>27/17 28/3 33/23 35/9<br/>36/4 36/8 37/6 38/1<br/>38/7 47/15 67/17 68/6<br/>71/10 74/4 76/19 81/2<br/>84/14 85/8 89/7 89/12<br/>93/16 95/5 106/17<br/>107/18 117/3 117/13<br/>120/6 120/21 122/11<br/>129/3 137/1 143/6<br/>146/8 148/18 148/21<br/>149/22 151/18 154/10<br/>163/4 163/25 167/4<br/>172/12 173/17 174/23<br/>175/5 182/15 182/23</p> <p><b>seeing [2]</b> 22/16<br/>167/7</p> <p><b>seek [1]</b> 38/17</p> <p><b>seeking [3]</b> 92/15<br/>120/5 181/6</p> <p><b>seem [2]</b> 63/1 120/6</p> <p><b>seemed [2]</b> 147/13<br/>169/4</p> <p><b>seems [3]</b> 17/10<br/>27/10 72/19</p> <p><b>seen [15]</b> 5/18 17/17<br/>22/3 32/20 58/23<br/>119/3 119/18 119/21<br/>123/12 137/23 138/6<br/>138/16 140/20 167/3<br/>173/15</p> <p><b>select [3]</b> 31/17<br/>94/13 135/15</p> <p><b>selected [1]</b> 135/10</p> <p><b>self [5]</b> 2/4 2/7 102/2<br/>102/4 110/1</p> <p><b>self-employed [2]</b><br/>102/2 102/4</p> <p><b>self-incrimination [2]</b><br/>2/4 2/7</p> <p><b>send [2]</b> 7/7 17/24</p> <p><b>sending [1]</b> 130/1</p> <p><b>senior [10]</b> 39/18<br/>40/1 40/4 61/19 83/15<br/>83/20 89/23 99/17<br/>100/5 147/12</p> <p><b>sense [7]</b> 30/17</p> | <p>30/19 36/3 55/10<br/>68/19 70/22 73/13</p> <p><b>sensible [2]</b> 106/9<br/>177/14</p> <p><b>sensitive [1]</b> 80/14</p> <p><b>sent [11]</b> 6/14 17/24<br/>18/18 19/5 19/15 51/4<br/>118/18 118/19 168/1<br/>183/18 183/23</p> <p><b>sentence [8]</b> 15/20<br/>36/5 117/14 117/17<br/>127/10 130/9 145/8<br/>164/21</p> <p><b>sentiment [1]</b> 15/15</p> <p><b>separate [10]</b> 5/16<br/>21/12 55/9 66/22 68/3<br/>69/20 82/25 105/14<br/>132/13 146/20</p> <p><b>separated [1]</b> 155/3</p> <p><b>September [7]</b> 119/4<br/>141/22 166/22 167/17<br/>167/19 172/12 173/24</p> <p><b>series [2]</b> 131/9<br/>183/17</p> <p><b>serious [3]</b> 51/22<br/>63/12 73/25</p> <p><b>seriousness [1]</b><br/>51/24</p> <p><b>service [2]</b> 91/20<br/>93/5</p> <p><b>services [3]</b> 96/14<br/>96/15 147/6</p> <p><b>serving [1]</b> 86/25</p> <p><b>session [3]</b> 141/22<br/>142/10 142/11</p> <p><b>set [14]</b> 25/18 63/9<br/>68/23 77/19 86/1<br/>110/9 110/14 110/16<br/>149/4 149/15 149/18<br/>150/3 152/9 166/5</p> <p><b>sets [4]</b> 9/14 122/1<br/>149/15 151/9</p> <p><b>setting [3]</b> 32/21<br/>68/12 93/8</p> <p><b>settle [4]</b> 122/17<br/>167/12 168/10 168/13</p> <p><b>settlement [1]</b><br/>147/15</p> <p><b>seven [1]</b> 61/9</p> <p><b>several [10]</b> 43/10<br/>52/9 52/10 92/13<br/>110/7 116/6 172/9<br/>175/8 178/2 178/12</p> <p><b>severe [1]</b> 179/12</p> <p><b>severely [1]</b> 95/17</p> <p><b>shackle [2]</b> 92/20<br/>92/23</p> <p><b>shall [2]</b> 38/16<br/>145/25</p> <p><b>sham [1]</b> 181/7</p> <p><b>shape [2]</b> 109/6<br/>166/7</p> <p><b>shape-shifting [1]</b><br/>109/6</p> | <p><b>share [1]</b> 105/24</p> <p><b>shared [4]</b> 87/9<br/>130/13 130/14 136/14</p> <p><b>Shareholder [1]</b> 82/5</p> <p><b>sharing [2]</b> 45/4<br/>163/17</p> <p><b>she [21]</b> 8/13 111/9<br/>111/12 129/12 141/10<br/>147/4 147/12 147/13<br/>150/17 166/24 168/19<br/>169/3 169/7 169/14<br/>169/19 169/25 170/11<br/>170/12 170/20 170/23<br/>170/24</p> <p><b>she'd [3]</b> 169/9<br/>185/14 185/15</p> <p><b>she's [3]</b> 8/14 8/15<br/>8/16</p> <p><b>SHEILA [3]</b> 106/22<br/>106/25 188/14</p> <p><b>shifting [1]</b> 109/6</p> <p><b>shocking [1]</b> 182/14</p> <p><b>Shoosmiths [1]</b><br/>123/13</p> <p><b>shop [1]</b> 111/10</p> <p><b>short [5]</b> 37/4 84/4<br/>84/12 106/15 146/6</p> <p><b>shortcomings [1]</b><br/>85/21</p> <p><b>shortfall [4]</b> 52/16<br/>52/20 53/5 64/1</p> <p><b>shortfalls [5]</b> 46/15<br/>48/15 102/18 111/13<br/>130/6</p> <p><b>shorthand [4]</b> 2/3<br/>138/16 185/13 185/17</p> <p><b>shorthand-writer [1]</b><br/>185/17</p> <p><b>shortly [6]</b> 42/11 85/4<br/>107/25 112/21 117/9<br/>167/3</p> <p><b>should [44]</b> 2/14 2/18<br/>2/20 2/21 8/1 35/12<br/>36/6 37/17 61/17<br/>61/18 62/5 64/14 65/1<br/>78/11 87/16 96/6<br/>104/3 107/4 107/18<br/>109/9 118/16 129/25<br/>130/12 130/18 137/11<br/>140/13 140/19 152/8<br/>156/9 157/9 157/10<br/>157/17 158/24 159/11<br/>160/6 161/10 161/23<br/>161/25 163/23 169/20<br/>171/8 172/19 183/22<br/>187/5</p> <p><b>shouldn't [2]</b> 29/1<br/>138/5</p> <p><b>show [8]</b> 20/6 51/4<br/>60/23 113/18 130/10<br/>130/17 131/25 177/12</p> <p><b>showed [5]</b> 20/7<br/>20/12 52/23 59/7<br/>165/4</p> | <p><b>showing [2]</b> 52/16<br/>56/10</p> <p><b>shown [10]</b> 9/19<br/>27/21 46/15 46/17<br/>47/3 48/15 60/13<br/>67/12 84/20 107/10</p> <p><b>shows [2]</b> 79/2 177/5</p> <p><b>sic [2]</b> 28/6 165/11</p> <p><b>side [6]</b> 4/18 23/10<br/>23/11 52/3 168/21<br/>183/1</p> <p><b>Sight [52]</b> 85/20<br/>112/20 114/17 115/8<br/>116/5 116/18 116/19<br/>117/10 117/17 117/23<br/>120/9 121/11 122/13<br/>124/15 127/19 128/3<br/>129/19 130/23 134/20<br/>134/23 135/2 135/9<br/>136/1 136/16 136/20<br/>137/10 142/3 155/22<br/>155/23 155/23 156/7<br/>156/8 156/9 156/18<br/>157/7 157/10 157/12<br/>158/6 158/14 158/20<br/>160/7 161/12 162/15<br/>164/3 164/11 164/23<br/>173/18 173/18 173/25<br/>174/6 175/1 175/11</p> <p><b>Sight's [4]</b> 116/23<br/>135/23 136/12 174/7</p> <p><b>sign [1]</b> 114/12</p> <p><b>signature [6]</b> 38/1<br/>38/5 38/7 107/8<br/>107/19 107/20</p> <p><b>signature.' [1]</b> 7/9</p> <p><b>significance [1]</b> 77/9</p> <p><b>significant [6]</b> 4/11<br/>13/7 13/9 44/25 50/19<br/>52/24</p> <p><b>silos [1]</b> 132/12</p> <p><b>similar [5]</b> 1/21 77/5<br/>77/12 123/1 176/17</p> <p><b>similarity [1]</b> 180/3</p> <p><b>Simon [1]</b> 145/10</p> <p><b>simple [1]</b> 151/12</p> <p><b>simply [8]</b> 84/18<br/>98/15 113/4 126/3<br/>148/13 151/12 151/15<br/>165/19</p> <p><b>since [12]</b> 1/18 3/20<br/>18/16 39/17 39/25<br/>40/6 48/24 49/2 76/16<br/>94/8 103/24 155/5</p> <p><b>Singh [2]</b> 67/22 68/8</p> <p><b>single [3]</b> 3/7 3/24<br/>52/13</p> <p><b>sir [77]</b> 1/3 3/1 18/21<br/>36/13 36/15 37/6 84/3<br/>84/14 84/16 88/9<br/>88/11 88/13 88/16<br/>89/4 89/10 89/16<br/>96/18 100/9 105/24<br/>106/10 106/17 111/20</p> |

|                               |                              |                               |                                |                              |
|-------------------------------|------------------------------|-------------------------------|--------------------------------|------------------------------|
| <b>S</b>                      | <b>snippet [1]</b> 103/10    | 104/18 110/24 114/7           | 105/10 105/12 175/12           | 66/8 69/1 69/7 70/2          |
| <b>sir...</b> [55] 111/25     | <b>so [225]</b>              | 117/12 128/1 129/25           | <b>stage [36]</b> 56/8 59/6    | 81/24 83/7 84/17 88/4        |
| 112/10 112/12 112/17          | <b>Society [2]</b> 70/23     | 134/5 136/4 138/3             | 59/16 60/1 65/14 86/5          | 88/5 92/3 96/13 107/2        |
| 113/9 113/19 114/3            | 182/21                       | 140/19 142/19 143/1           | 87/9 87/10 110/20              | 107/19 107/21 108/2          |
| 118/15 121/13 126/7           | <b>software [3]</b> 126/18   | 153/5 156/4 160/3             | 110/25 111/25 116/10           | 111/3 113/2 115/6            |
| 126/25 129/6 129/15           | 127/22 131/8                 | 166/18 170/13 170/23          | 116/24 118/3 120/14            | 116/13 116/14 117/6          |
| 129/24 129/25 131/20          | <b>sole [2]</b> 83/25 97/22  | 176/4 181/5 185/11            | 123/4 123/8 123/16             | 118/8 118/20 120/23          |
| 132/9 133/23 139/8            | <b>solely [2]</b> 121/16     | <b>sort [20]</b> 8/7 8/24     | 124/12 125/7 125/18            | 128/18 132/20 132/21         |
| 139/11 141/1 145/23           | 149/21                       | 10/8 10/15 25/23              | 125/24 129/23 130/6            | 139/16 141/25 143/3          |
| 146/2 146/8 151/5             | <b>solicitors [4]</b> 178/24 | 26/12 29/22 30/21             | 130/16 131/16 133/5            | 146/12 148/7 149/9           |
| 151/14 153/10 153/13          | 179/19 179/25 180/8          | 43/14 45/4 45/6 48/25         | 137/12 139/12 139/15           | 150/5 153/4 153/5            |
| 158/3 159/2 159/5             | <b>some [63]</b> 3/7 8/7 8/8 | 68/16 73/22 120/2             | 144/4 145/2 145/10             | 155/11 166/11 167/2          |
| 159/6 159/9 159/21            | 8/12 10/8 10/15 20/23        | 135/9 167/11 168/11           | 145/19 148/3 164/17            | 171/22 172/16 176/16         |
| 163/11 163/19 165/17          | 25/23 26/12 28/11            | 179/17 183/13                 | <b>stages [2]</b> 137/16       | 181/4 185/21 185/22          |
| 172/2 176/19 178/2            | 29/22 30/20 34/6 35/3        | <b>sought [3]</b> 124/12      | 168/23                         | 187/9 187/11 187/19          |
| 183/16 183/22 184/4           | 38/17 38/17 40/8 41/3        | 148/9 149/20                  | <b>stake [1]</b> 169/21        | <b>statement.' [1]</b> 6/16  |
| 184/7 185/1 185/8             | 51/4 56/8 56/10 60/13        | <b>Sounds [1]</b> 6/10        | <b>stand [2]</b> 38/15         | <b>statements [6]</b> 11/11  |
| 185/10 185/18 185/21          | 74/5 77/2 79/6 87/11         | <b>South [1]</b> 111/10       | 107/24                         | 13/1 43/12 54/7 76/15        |
| 186/3 187/4 187/7             | 91/11 93/3 95/9 96/12        | <b>Southampton [2]</b>        | <b>standard [2]</b> 45/3       | 186/19                       |
| 187/13 187/14 187/23          | 100/11 108/1 111/15          | 110/15 110/23                 | 131/24                         | <b>states [2]</b> 77/25      |
| <b>Sir Alan [27]</b> 96/18    | 111/23 120/3 123/16          | <b>Sparrow [1]</b> 146/21     | <b>standards [1]</b> 80/3      | 79/10                        |
| 111/20 111/25 112/10          | 127/21 128/5 129/11          | <b>speak [6]</b> 2/21 5/8     | <b>standing [2]</b> 81/10      | <b>statistics [2]</b> 60/13  |
| 112/12 112/17 113/9           | 135/5 135/7 135/9            | 55/19 95/8 108/16             | 153/20                         | 60/20                        |
| 113/19 114/3 121/13           | 136/10 141/2 141/7           | 183/3                         | <b>stands [1]</b> 168/20       | <b>status [2]</b> 70/4 70/7  |
| 126/7 126/25 129/6            | 141/11 142/13 143/16         | <b>speaking [4]</b> 5/5       | <b>start [17]</b> 5/3 9/8 20/6 | <b>statute [1]</b> 153/15    |
| 129/15 129/24 129/25          | 147/14 153/17 153/19         | 10/17 13/2 57/9               | 73/24 108/4 109/17             | <b>stay [1]</b> 165/18       |
| 131/20 132/9 133/23           | 155/4 158/8 161/8            | <b>special [2]</b> 71/25      | 109/22 111/1 120/12            | <b>steadfast [1]</b> 109/1   |
| 139/8 139/11 141/1            | 161/8 166/6 167/11           | 108/15                        | 135/18 143/1 143/2             | <b>steal [1]</b> 59/17       |
| 158/3 163/19 178/2            | 168/11 177/16 178/6          | <b>specific [15]</b> 8/10     | 151/13 154/8 159/25            | <b>stealing [1]</b> 58/2     |
| 183/16 183/22                 | 183/11 183/13 184/23         | 48/14 51/20 52/15             | 172/11 184/8                   | <b>Stein [11]</b> 88/18 89/1 |
| <b>Sir Anthony [11]</b>       | <b>somebody [10]</b> 14/19   | 74/16 83/8 91/5 94/11         | <b>started [5]</b> 67/6        | 89/20 90/1 95/7 185/2        |
| 151/5 151/14 153/10           | 24/7 35/12 43/16             | 98/4 98/23 116/10             | 99/16 130/23 141/21            | 185/8 185/9 185/20           |
| 153/13 159/2 159/5            | 43/18 56/12 63/20            | 120/11 134/24 173/19          | 178/9                          | 188/10 188/19                |
| 159/6 159/9 159/21            | 141/10 147/13 147/14         | 174/15                        | <b>starting [4]</b> 113/1      | <b>stenographer [2]</b>      |
| 165/17 172/2                  | <b>somehow [2]</b> 99/10     | <b>specifically [1]</b> 43/6  | 120/20 123/13 153/18           | 48/4 84/3                    |
| <b>Sir Wyn [1]</b> 186/3      | 99/12                        | <b>specified [1]</b> 24/18    | <b>state [4]</b> 78/7 79/15    | <b>step [2]</b> 64/16 87/4   |
| <b>sirs [1]</b> 118/12        | <b>someone [12]</b> 14/8     | <b>specify [1]</b> 181/21     | 106/24 125/2                   | <b>stepping [1]</b> 135/20   |
| <b>sit [4]</b> 82/20 83/6     | 19/2 20/20 44/6 94/23        | <b>Spelling [1]</b> 107/14    | <b>stated [2]</b> 48/18 59/2   | <b>steps [8]</b> 76/14 82/2  |
| 91/8 104/24                   | 147/10 149/19 150/18         | <b>spelt [2]</b> 107/12       | <b>statement [139]</b> 3/9     | 82/17 83/9 154/25            |
| <b>sitting [3]</b> 22/7       | 159/9 159/14 160/25          | 107/13                        | 4/4 5/8 5/17 6/1 6/7           | 154/25 163/8 181/15          |
| 103/18 150/13                 | 171/2                        | <b>spent [1]</b> 31/16        | 7/5 7/9 7/15 8/10 8/12         | <b>STEVENS [9]</b> 106/23    |
| <b>situation [2]</b> 50/4     | <b>someone's [1]</b> 182/8   | <b>SPM [2]</b> 109/3 109/9    | 8/15 8/15 8/25 9/6             | 118/10 177/4 181/5           |
| 51/24                         | <b>something [24]</b> 7/7    | <b>SPMR [1]</b> 170/7         | 11/4 12/2 12/9 13/15           | 186/4 186/10 186/22          |
| <b>situations [1]</b> 155/24  | 7/20 16/21 26/8 44/16        | <b>SPMs [10]</b> 108/6        | 13/18 14/5 14/9 14/12          | 187/19 188/17                |
| <b>six [5]</b> 6/6 61/7 62/14 | 44/25 50/25 54/5 55/8        | 108/16 109/7 113/12           | 14/23 15/23 16/3               | <b>Sticking [1]</b> 151/21   |
| 152/25 153/15                 | 62/6 62/21 64/8 64/14        | 114/14 114/23 123/5           | 18/13 18/17 18/19              | <b>still [13]</b> 44/1 75/18 |
| <b>six-year [1]</b> 153/15    | 104/3 120/25 126/17          | 125/4 133/6 187/1             | 19/1 19/4 19/12 19/17          | 86/25 92/8 114/18            |
| <b>skills [3]</b> 50/11 50/12 | 126/21 134/1 138/1           | <b>SPMs' [1]</b> 130/6        | 20/1 20/15 20/16               | 134/4 139/15 140/5           |
| 50/12                         | 143/14 161/6 166/7           | <b>spoke [6]</b> 95/11        | 20/16 20/21 21/1               | 152/15 161/6 161/10          |
| <b>skip [1]</b> 29/18         | 170/13 180/2                 | 112/7 112/10 112/13           | 24/14 24/22 25/6               | 166/10 168/22                |
| <b>slide [1]</b> 143/5        | <b>sometimes [3]</b>         | 139/11 187/1                  | 25/19 26/4 26/7 26/18          | <b>stock [1]</b> 47/17       |
| <b>slight [1]</b> 150/4       | 165/11 186/6 186/15          | <b>spoken [1]</b> 119/3       | 26/20 27/1 27/7 27/17          | <b>stocks [2]</b> 105/2      |
| <b>slightly [3]</b> 108/18    | <b>somewhat [1]</b> 162/20   | <b>sporadic [1]</b> 181/23    | 28/22 29/3 29/6 29/10          | 105/6                        |
| 133/14 148/20                 | <b>somewhere [3]</b> 5/3     | <b>spot [8]</b> 115/18 116/1  | 30/1 31/6 31/17 31/21          | <b>stone [1]</b> 135/20      |
| <b>slip [1]</b> 166/6         | 73/16 177/1                  | 116/2 130/7 130/23            | 31/24 31/25 32/1 32/6          | <b>stood [1]</b> 182/9       |
| <b>sloppy [1]</b> 32/16       | <b>soon [1]</b> 133/3        | 131/1 135/15 138/13           | 32/24 33/8 33/9 34/9           | <b>stop [4]</b> 145/23 159/1 |
| <b>slow [2]</b> 48/3 150/20   | <b>sorry [45]</b> 10/11      | <b>spreadsheets [3]</b>       | 34/12 34/16 34/23              | 164/25 182/25                |
| <b>slowed [1]</b> 148/15      | 11/21 13/13 15/25            | 12/17 24/19 29/17             | 35/5 35/11 35/13               | <b>stopped [2]</b> 151/15    |
| <b>slowly [2]</b> 16/2        | 16/19 18/21 28/13            | <b>staff [22]</b> 39/13 39/14 | 35/17 35/21 37/17              | 183/12                       |
| 183/12                        | 28/15 32/2 32/13 36/8        | 41/2 41/17 42/16              | 37/20 37/24 38/2 38/8          | <b>stored [1]</b> 155/4      |
| <b>small [5]</b> 52/4 102/4   | 49/8 58/13 58/14             | 45/21 50/3 52/17 53/3         | 38/12 38/15 39/24              | <b>Stoy [2]</b> 184/14       |
| 110/3 110/13 117/2            | 58/15 61/24 62/9             | 57/13 59/1 65/3 65/21         | 42/7 46/16 53/11               | 184/21                       |
| <b>Smith [1]</b> 110/14       | 70/17 76/4 88/16 89/1        | 66/14 66/14 67/1              | 54/10 58/9 58/16               | <b>straight [5]</b> 15/3     |
|                               | 100/8 101/11 104/13          | 75/14 94/5 94/5               | 58/20 61/13 64/20              | 156/10 157/11 157/17         |

|   |   |  |  |   |
|---|---|--|--|---|
| <b>S</b>  | 186/16  | <b>support [21]</b> 4/1<br>17/12 27/12 27/25<br>29/6 31/9 46/12 50/3<br>86/6 87/17 108/14<br>108/22 109/7 113/7<br>115/23 122/6 138/6<br>143/23 144/1 147/2<br>186/15  | 43/7 43/23 53/6 63/3<br>63/4 63/9 64/2 82/4<br>85/15 86/13 86/16<br>86/19 113/7 115/12<br>120/18 121/6 121/9<br>121/16 121/17 122/5<br>123/2 124/7 125/9<br>125/17 126/13 126/17<br>127/14 127/15 128/10<br>133/2 137/1 137/3<br>137/14 137/24 139/4<br>139/10 148/4 149/21<br>150/14 170/17 170/24<br>172/21 183/1 183/21 | 97/8 104/21 104/21<br>125/5 143/17 172/25<br><b>task [1]</b> 32/21<br><b>taxation [2]</b> 109/8<br>110/12<br><b>team [21]</b> 3/18 11/10<br>14/8 20/21 35/12 83/9<br>102/19 102/23 102/24<br>104/19 104/20 104/25<br>105/1 105/18 105/19<br>109/12 147/9 151/11<br>173/9 181/14 182/20        |
| <b>straight... [1]</b> 167/15   | <b>subpostmistress [1]</b><br>108/21  | <b>supported [1]</b> 108/9   | <b>system' [1]</b> 127/12  | <b>Teams [1]</b> 105/3  |
| <b>straightforward [1]</b><br>165/20  | <b>subscription [2]</b><br>78/11 79/1   | <b>supporting [1]</b> 90/19  | <b>system-wide [1]</b><br>137/24   | <b>tears [1]</b> 111/12   |
| <b>straits [1]</b> 133/25   | <b>subsequent [4]</b><br>41/18 42/10 44/5<br>129/11   | <b>supposed [3]</b> 141/19<br>152/14 152/16  | <b>systemic [18]</b> 118/4<br>118/4 121/1 121/12<br>121/15 121/22 122/4<br>126/13 127/1 127/11<br>127/13 127/16 137/2<br>137/12 137/20 137/24<br>139/5 139/19  | <b>technical [2]</b> 14/17<br>40/22   |
| <b>strange [1]</b> 158/20   | <b>subside [1]</b> 85/23  | <b>suppress [1]</b> 85/20  | <b>systems [2]</b> 121/1<br>121/22   | <b>Telecom [1]</b> 70/23  |
| <b>strategy [1]</b> 181/16  | <b>substance [4]</b> 9/14<br>24/11 116/9 145/15   | <b>sure [13]</b> 8/16 11/18<br>18/4 59/22 90/8<br>132/17 147/5 148/3<br>151/18 152/14 158/17<br>159/15 185/14  | <b>T</b>   | <b>telephone [2]</b> 112/24<br>153/23   |
| <b>stream [1]</b> 78/6  | <b>substantial [9]</b> 52/8<br>52/16 52/20 60/24<br>84/21 130/4 133/8<br>159/18 173/11  | <b>surely [1]</b> 100/24   | <b>table [1]</b> 158/25  | <b>tell [6]</b> 2/11 2/22<br>18/24 55/2 142/22<br>175/18  |
| <b>strength [2]</b> 99/8<br>100/3   | <b>success [2]</b> 177/14<br>178/25   | <b>surface [1]</b> 101/9   | <b>tactic [2]</b> 182/25<br>183/12   | <b>telling [2]</b> 99/3<br>125/11   |
| <b>strict [1]</b> 77/19   | <b>successor [1]</b> 56/22  | <b>surplus [1]</b> 174/4   | <b>tactics [3]</b> 103/5<br>181/22 182/14  | <b>ten [2]</b> 36/21 68/15  |
| <b>strikes [1]</b> 91/22  | <b>such [32]</b> 2/11 8/23<br>9/23 25/24 26/13<br>32/13 53/8 53/22 55/3<br>87/15 91/7 92/13<br>92/18 93/1 93/25 97/4<br>99/14 100/3 100/12<br>102/6 102/11 108/11<br>120/6 124/9 124/13<br>142/11 159/11 170/17<br>178/20 181/25 182/20<br>184/23 | <b>surprised [1]</b> 129/21  | <b>take [40]</b> 2/17 11/15<br>19/8 23/14 34/15<br>35/12 36/16 47/24<br>54/17 71/19 80/17<br>82/2 82/13 82/17 83/9<br>84/8 91/15 91/15 93/2<br>94/24 120/19 121/20<br>123/22 126/12 132/2<br>140/15 140/16 157/4<br>157/18 157/22 162/23<br>163/23 165/2 170/1<br>171/4 177/15 178/24<br>179/20 179/24 180/17              | <b>ten years [1]</b> 68/15  |
| <b>striking [1]</b> 36/3  | <b>suddenly [1]</b> 166/8   | <b>surreptitiously [1]</b><br>24/7   | <b>territorial [1]</b> 49/22   | <b>tends [2]</b> 60/23 67/13  |
| <b>strong [4]</b> 46/20 49/9<br>103/19 161/3  | <b>suffered [3]</b> 123/2<br>143/19 160/25  | <b>Susan [9]</b> 141/1<br>141/3 141/4 141/8<br>142/4 149/16 150/6<br>150/8 151/1   | <b>term [1]</b> 72/21  | <b>tension [2]</b> 69/2<br>69/19  |
| <b>stronger [1]</b> 139/18  | <b>sufficient [11]</b> 7/25<br>32/7 43/1 125/14<br>132/2 137/9 142/22<br>158/22 177/12 180/1<br>180/4   | <b>swapped [1]</b> 130/2   | <b>terminated [1]</b> 74/20  | <b>tensions [2]</b> 69/12<br>69/15  |
| <b>strongly [2]</b> 108/9<br>162/22   | <b>suggest [4]</b> 8/1 32/15<br>72/18 79/5  | <b>Swanson's [1]</b><br>107/11   | <b>terminating [1]</b> 87/1  | <b>terms [37]</b> 1/21 3/15<br>9/14 16/14 39/2 63/12<br>66/25 75/15 83/16<br>83/17 92/13 92/19<br>96/9 109/16 122/9<br>141/5 147/16 148/9<br>148/11 148/14 148/21<br>148/25 149/6 149/7<br>149/11 149/13 149/18<br>149/24 151/22 152/1<br>152/2 152/6 152/10<br>152/13 155/19 156/5<br>160/21 |
| <b>struck [1]</b> 141/10  | <b>suggested [11]</b><br>13/19 20/17 33/1<br>33/10 99/15 112/7<br>112/9 129/2 129/13<br>141/15 175/10   | <b>Swinson [1]</b> 107/13  | <b>terminating [1]</b> 87/1  | <b>terms [37]</b> 1/21 3/15<br>9/14 16/14 39/2 63/12<br>66/25 75/15 83/16<br>83/17 92/13 92/19<br>96/9 109/16 122/9<br>141/5 147/16 148/9<br>148/11 148/14 148/21<br>148/25 149/6 149/7<br>149/11 149/13 149/18<br>149/24 151/22 152/1<br>152/2 152/6 152/10<br>152/13 155/19 156/5<br>160/21 |
| <b>structure [7]</b> 63/13<br>63/14 82/19 83/21<br>101/19 113/14 142/13   | <b>suitable [7]</b> 156/20<br>157/5 157/10 157/23<br>157/24 158/5 158/9   | <b>switch [1]</b> 21/18  | <b>terminating [1]</b> 87/1  | <b>terms [37]</b> 1/21 3/15<br>9/14 16/14 39/2 63/12<br>66/25 75/15 83/16<br>83/17 92/13 92/19<br>96/9 109/16 122/9<br>141/5 147/16 148/9<br>148/11 148/14 148/21<br>148/25 149/6 149/7<br>149/11 149/13 149/18<br>149/24 151/22 152/1<br>152/2 152/6 152/10<br>152/13 155/19 156/5<br>160/21 |
| <b>structures [2]</b> 48/24<br>49/18  | <b>summarise [1]</b> 183/7  | <b>swore [1]</b> 4/21  | <b>terminating [1]</b> 87/1  | <b>terms [37]</b> 1/21 3/15<br>9/14 16/14 39/2 63/12<br>66/25 75/15 83/16<br>83/17 92/13 92/19<br>96/9 109/16 122/9<br>141/5 147/16 148/9<br>148/11 148/14 148/21<br>148/25 149/6 149/7<br>149/11 149/13 149/18<br>149/24 151/22 152/1<br>152/2 152/6 152/10<br>152/13 155/19 156/5<br>160/21 |
| <b>subject [4]</b> 52/15<br>144/23 152/4 185/4  | <b>summarised [1]</b> 77/1  | <b>sworn [7]</b> 1/10 37/10<br>37/11 106/22 188/2<br>188/6 188/15  | <b>terminating [1]</b> 87/1  | <b>terms [37]</b> 1/21 3/15<br>9/14 16/14 39/2 63/12<br>66/25 75/15 83/16<br>83/17 92/13 92/19<br>96/9 109/16 122/9<br>141/5 147/16 148/9<br>148/11 148/14 148/21<br>148/25 149/6 149/7<br>149/11 149/13 149/18<br>149/24 151/22 152/1<br>152/2 152/6 152/10<br>152/13 155/19 156/5<br>160/21 |
| <b>submission [1]</b> 58/2  | <b>summarising [2]</b><br>77/3 156/19   | <b>sympathetic [1]</b><br>171/2  | <b>territorial [1]</b> 49/22   | <b>test [1]</b> 161/24  |
| <b>subparagraph [1]</b><br>80/12  | <b>summary [7]</b> 9/14<br>29/18 51/9 51/13<br>100/1 100/6 156/2  | <b>system [91]</b> 8/4 8/7<br>9/2 9/12 9/20 10/1<br>10/4 10/8 10/15 11/13<br>11/25 13/3 13/20<br>16/24 17/3 17/11<br>17/13 17/19 19/20<br>21/18 24/7 25/9 25/23<br>26/12 27/11 27/13<br>29/22 29/24 30/6 30/9<br>30/12 30/21 30/22<br>30/24 31/10 32/17<br>34/25 35/3 35/4 35/16<br>35/19 35/21 35/23<br>40/17 42/8 42/21 43/3 | <b>test [1]</b> 161/24   | <b>test [1]</b> 161/24  |
| <b>subpostmaster [9]</b><br>52/20 68/12 87/13<br>94/14 113/8 121/8<br>142/24 156/24 170/9   | <b>sums [1]</b> 185/25  | <b>superseded [1]</b><br>149/6   | <b>test [1]</b> 161/24   | <b>test [1]</b> 161/24  |
| <b>subpostmaster's [4]</b><br>31/9 35/8 131/11<br>172/25  | <b>superseded [1]</b><br>149/6  |  | <b>test [1]</b> 161/24   | <b>test [1]</b> 161/24  |
| <b>subpostmasters [63]</b><br>60/14 65/8 65/10<br>65/13 65/16 65/25<br>66/1 66/7 66/9 66/13<br>66/15 67/2 67/3 67/7<br>67/8 67/14 68/17<br>68/21 69/16 70/2 75/8<br>77/17 80/17 81/19<br>82/14 84/19 85/6<br>85/25 87/11 87/11<br>90/2 90/12 90/19 91/4<br>92/6 94/1 95/10 97/1<br>99/6 100/22 100/24<br>102/2 102/4 105/16<br>108/23 110/19 111/2<br>111/7 113/20 113/20<br>118/15 125/16 133/1<br>133/3 133/24 134/13<br>151/8 153/11 168/10<br>186/10 186/16 186/24<br>187/2 |   |  | <b>test [1]</b> 161/24   | <b>test [1]</b> 161/24  |
| <b>subpostmasters' [7]</b><br>75/20 111/2 122/25<br>124/8 136/3 136/7<br>172/1  |   |  | <b>test [1]</b> 161/24   | <b>test [1]</b> 161/24  |
| <b>subpostmasters/mistresses [2]</b> 90/2   |   |  | <b>test [1]</b> 161/24   | <b>test [1]</b> 161/24  |

|          |   |  |   |   |
|----------|---|--|---|---|
| <b>T</b> | 159/23 163/6 163/14<br>163/15 163/19 164/19<br>165/9 167/11 172/7<br>175/1 176/4 176/6<br>176/23 180/16 181/11<br>182/4 185/13 187/20<br><b>theft [15]</b> 51/13 57/4<br>57/6 57/10 57/13<br>57/20 57/22 58/6<br>58/10 58/17 59/13<br>103/15 104/25 105/13<br>161/18<br><b>their [79]</b> 29/14 41/11<br>43/21 43/21 43/22<br>44/8 44/9 45/7 47/11<br>47/16 47/17 51/25<br>53/8 53/14 53/23 54/4<br>54/9 55/13 55/16<br>55/16 55/18 56/1 56/2<br>57/22 59/8 59/16<br>63/13 69/13 69/17<br>70/8 73/12 73/17 74/1<br>75/5 76/2 79/1 79/18<br>80/17 82/15 88/11<br>97/12 97/13 100/15<br>103/15 103/16 104/16<br>108/14 109/4 114/24<br>115/10 115/13 115/17<br>117/3 125/8 125/11<br>125/16 125/20 127/13<br>130/23 133/9 135/20<br>136/21 138/8 140/2<br>155/2 155/7 160/7<br>161/7 162/3 162/5<br>165/12 167/14 168/10<br>173/19 176/15 179/20<br>182/20 186/17 186/18<br><b>theirs [1]</b> 121/15<br><b>them [91]</b> 8/21 9/12<br>10/2 11/12 12/7 18/24<br>23/14 44/22 45/3<br>49/18 50/3 50/9 50/11<br>50/12 51/7 51/18 55/3<br>56/6 56/6 56/13 58/19<br>59/11 59/14 59/21<br>62/6 62/19 62/20 66/5<br>68/11 68/13 68/21<br>71/6 73/5 73/16 75/13<br>75/23 77/2 77/20 81/8<br>86/25 96/9 96/10<br>96/10 96/12 97/2<br>99/10 101/8 103/25<br>104/1 105/12 108/12<br>109/4 109/10 109/11<br>113/13 115/3 115/3<br>115/12 115/16 115/17<br>116/7 117/3 119/5<br>119/6 121/10 124/25<br>125/10 131/7 132/16<br>134/1 135/12 135/13<br>137/13 139/25 151/17<br>157/1 159/1 167/13<br>167/14 169/25 171/21<br>177/1 179/9 179/24 | 180/9 180/25 183/14<br>185/5 186/14 186/17<br>186/21<br><b>themselves [10]</b><br>14/15 44/6 50/4 51/25<br>63/24 104/5 104/14<br>104/16 122/21 173/4<br><b>then [117]</b> 2/22 5/14<br>5/17 6/5 6/17 7/3 7/10<br>9/3 9/14 10/20 12/1<br>12/8 16/1 16/7 16/7<br>16/11 16/24 17/3 18/3<br>18/10 18/15 21/3 21/4<br>21/12 22/24 23/9<br>23/25 24/1 24/2 24/2<br>24/12 24/25 25/13<br>25/18 29/18 30/15<br>30/17 33/12 43/15<br>47/23 48/25 51/4 53/2<br>53/9 58/4 58/4 58/4<br>58/22 59/8 59/10 61/7<br>61/9 63/10 68/17<br>68/22 68/23 70/18<br>70/21 73/4 74/2 79/22<br>83/12 89/2 89/2 89/6<br>89/14 89/16 91/25<br>93/14 94/12 95/13<br>96/19 98/10 99/23<br>101/4 101/14 101/20<br>102/17 103/13 107/18<br>110/8 110/12 110/14<br>111/1 111/9 114/2<br>115/25 117/25 119/1<br>119/2 119/6 119/14<br>120/20 121/20 124/19<br>126/20 132/19 136/8<br>140/6 142/7 145/6<br>149/4 149/7 157/3<br>157/14 158/6 162/6<br>163/19 165/5 166/5<br>166/8 170/7 177/4<br>177/6 178/12 180/19<br>185/18<br><b>then-Assistant [1]</b><br>83/12<br><b>there [182]</b> 2/1 6/9<br>7/24 7/25 7/25 11/12<br>12/2 16/21 18/18<br>20/23 21/4 21/24<br>23/10 23/17 25/5 25/7<br>25/23 26/12 26/16<br>27/25 28/11 28/19<br>29/4 30/16 32/4 32/12<br>32/22 33/25 34/2 34/3<br>34/6 34/17 34/18 35/1<br>35/18 35/20 35/23<br>37/18 38/1 38/7 42/18<br>43/17 45/23 46/23<br>47/22 47/23 49/5 51/3<br>53/22 55/9 55/20 56/8<br>57/4 61/7 61/7 61/8<br>61/8 61/11 61/11<br>62/21 63/3 63/10<br>63/12 64/2 65/2 65/17 | 65/18 65/19 65/22<br>65/24 66/19 67/6<br>70/13 71/3 71/3 71/4<br>72/14 74/8 74/13<br>77/12 77/21 77/23<br>78/17 79/5 80/8 80/21<br>81/6 82/8 84/5 85/17<br>86/16 86/18 88/11<br>92/17 94/24 95/7<br>95/25 96/20 99/12<br>101/13 102/1 103/21<br>103/21 108/8 114/15<br>114/15 114/21 115/7<br>118/3 118/13 118/20<br>119/4 121/10 121/20<br>122/4 123/5 123/7<br>123/18 123/19 124/5<br>124/11 125/25 126/15<br>127/3 129/14 129/23<br>130/3 130/24 131/2<br>132/15 133/11 133/16<br>133/17 134/10 135/5<br>135/7 135/22 135/25<br>136/1 136/6 137/1<br>137/9 137/11 138/1<br>140/11 143/14 143/20<br>143/25 144/14 149/22<br>150/4 151/2 151/17<br>152/11 152/24 153/20<br>155/18 155/24 156/16<br>156/23 158/10 158/21<br>161/2 161/3 161/6<br>164/13 165/25 167/16<br>170/14 172/16 174/4<br>174/18 176/9 179/24<br>180/2 180/3 180/23<br>182/19 182/22 183/11<br>185/6 186/24<br><b>there'd [1]</b> 161/15<br><b>there's [22]</b> 5/18 5/20<br>10/1 12/1 27/23 30/7<br>30/21 32/11 67/24<br>69/19 73/1 80/22<br>90/22 103/19 105/24<br>113/13 113/14 129/11<br>144/14 148/21 175/13<br>176/25<br><b>thereafter [3]</b> 2/14<br>175/15 176/13<br><b>therefore [10]</b> 3/24<br>17/12 27/12 32/9 58/9<br>75/20 93/9 131/15<br>137/15 169/23<br><b>Therium [4]</b> 178/18<br>178/19 178/21 179/18<br><b>these [40]</b> 6/19 8/10<br>11/9 11/16 12/25 13/1<br>13/6 16/12 18/2 24/5<br>24/8 25/13 40/25 42/3<br>44/1 46/1 55/6 57/6<br>60/20 68/7 73/18 79/8<br>79/13 79/19 81/4<br>82/14 87/10 95/23<br>96/2 96/6 96/20 98/24 | 125/22 126/16 127/13<br>137/6 153/19 153/23<br>171/24 186/11<br><b>they [155]</b> 8/22 10/18<br>11/4 12/7 12/8 13/9<br>23/1 23/2 36/11 38/24<br>43/5 43/9 43/20 43/21<br>44/8 44/9 44/15 44/21<br>46/14 47/16 49/24<br>51/16 51/17 51/21<br>52/17 52/18 52/19<br>52/21 52/21 53/7<br>54/19 54/21 55/2<br>55/15 55/17 56/7<br>56/12 56/13 57/6<br>58/22 59/8 59/17<br>60/21 61/2 61/3 61/21<br>62/5 62/5 62/9 62/10<br>63/10 63/19 65/5<br>65/15 66/6 67/4 68/16<br>68/20 68/21 69/12<br>70/5 70/7 71/5 72/20<br>73/5 73/6 73/17 74/1<br>75/8 75/22 77/21 78/7<br>79/3 80/3 86/2 86/25<br>96/8 96/25 97/5 97/12<br>99/19 100/4 100/13<br>100/23 102/8 103/2<br>105/5 105/11 107/23<br>114/24 115/4 115/8<br>115/20 115/21 115/22<br>115/23 116/9 117/4<br>122/17 123/8 125/12<br>125/13 125/14 125/19<br>125/20 128/6 128/10<br>130/24 131/14 135/10<br>135/12 136/10 137/11<br>137/13 137/17 138/5<br>138/7 138/8 140/3<br>140/15 140/16 140/18<br>141/7 143/19 144/1<br>144/4 154/13 154/25<br>155/2 155/5 157/18<br>158/17 159/23 161/6<br>161/10 162/23 164/12<br>165/4 166/3 168/11<br>168/21 168/22 169/23<br>171/1 171/6 171/18<br>173/1 173/7 173/12<br>173/17 176/16 178/23<br>178/23 181/23 183/23<br><b>they'd [11]</b> 51/20<br>125/8 133/14 136/2<br>136/7 140/4 140/14<br>144/3 155/2 161/19<br>165/12<br><b>they'll [2]</b> 73/2 73/3<br><b>they're [17]</b> 10/17<br>23/21 50/4 55/22<br>62/19 62/20 67/5<br>73/25 74/1 91/20<br>103/21 125/11 131/7<br>152/25 166/8 166/9<br>176/24 |
|----------|---|--|---|---|

|                              |                               |                              |                               |                               |
|------------------------------|-------------------------------|------------------------------|-------------------------------|-------------------------------|
| <b>T</b>                     | 185/4 185/5 185/8             | <b>threshold [1]</b> 51/10   | <b>together [12]</b> 7/7      | 14/3 14/3 19/21 24/18         |
| <b>they've [4]</b> 74/2      | <b>thinking [7]</b> 8/18 8/24 | <b>thresholds [1]</b> 51/10  | 7/20 29/14 31/21              | 30/10 33/3 67/4 121/6         |
| 108/13 137/18 168/12         | 15/7 30/15 30/23              | <b>through [46]</b> 5/1 5/2  | 44/20 46/8 50/9 72/14         | 131/9                         |
| <b>thick [1]</b> 124/2       | 129/3 176/14                  | 26/2 26/8 26/15 31/2         | 123/21 168/4 178/9            | <b>transactions' [1]</b>      |
| <b>thing [9]</b> 9/15 10/17  | <b>thinks [3]</b> 73/1        | 32/20 36/3 42/8 42/23        | 180/4                         | 16/6                          |
| 15/8 22/22 22/24 23/9        | 169/25 170/12                 | 44/1 47/24 50/11             | <b>told [16]</b> 3/22 34/18   | <b>transcript [3]</b> 4/11    |
| 24/12 57/3 61/5              | <b>third [13]</b> 9/12 10/9   | 54/20 55/17 59/14            | 62/3 82/9 87/15               | 4/17 19/8                     |
| <b>things [19]</b> 6/7 15/12 | 10/13 19/21 23/9              | 63/11 70/20 73/22            | 112/14 114/6 114/8            | <b>transfer [1]</b> 72/2      |
| 22/19 55/9 67/5 82/21        | 26/10 26/23 27/4 27/6         | 95/18 99/20 99/24            | 138/24 139/3 139/4            | <b>transparent [1]</b> 80/9   |
| 104/22 104/23 125/12         | 27/15 29/20 32/10             | 101/12 101/14 101/19         | 139/6 144/4 155/5             | <b>transpired [1]</b> 101/20  |
| 130/2 150/16 150/20          | 34/11                         | 109/8 109/13 120/16          | 175/21 176/5                  | <b>treasurer [1]</b> 113/15   |
| 152/18 172/22 178/2          | <b>thirdly [1]</b> 178/9      | 123/7 125/16 138/17          | <b>tomorrow [1]</b> 187/22    | <b>treated [6]</b> 51/11      |
| 180/11 180/14 182/21         | <b>this [277]</b>             | 139/4 140/12 144/21          | <b>tone [5]</b> 150/5 150/7   | 51/12 52/5 86/2 93/6          |
| 186/19                       | <b>Thomas [11]</b> 3/9 3/23   | 147/22 158/24 159/23         | 151/2 151/3 151/19            | 168/13                        |
| <b>think [156]</b> 1/19 3/19 | 4/6 6/13 19/13 28/14          | 162/22 168/15 169/9          | <b>too [3]</b> 127/22 173/7   | <b>treatment [1]</b> 111/6    |
| 4/8 7/24 10/10 11/7          | 28/15 28/18 28/19             | 169/10 169/11 169/12         | 173/16                        | <b>treaty [3]</b> 79/24 80/1  |
| 11/16 12/21 13/20            | 28/23 33/1                    | 183/18 186/17 187/16         | <b>took [7]</b> 46/6 64/23    | 80/6                          |
| 13/22 13/25 14/10            | <b>Thomas' [3]</b> 5/21       | <b>throughout [2]</b>        | 71/7 93/4 93/10 141/6         | <b>trial [6]</b> 40/16 40/22  |
| 15/19 18/16 20/18            | 6/13 28/1                     | 144/13 180/25                | 147/25                        | 111/16 130/21 182/1           |
| 21/5 22/14 22/19             | <b>Thomson [1]</b> 70/19      | <b>throw [1]</b> 120/7       | <b>top [11]</b> 4/18 16/1     | 182/25                        |
| 23/15 28/24 29/5             | <b>thorough [4]</b> 114/23    | <b>Thursday [4]</b> 1/1      | 22/2 97/17 101/14             | <b>trials [2]</b> 145/14      |
| 30/23 31/3 31/24             | 138/7 157/11 169/7            | 4/20 105/4 154/8             | 107/5 111/4 132/17            | 146/22                        |
| 32/11 33/13 34/15            | <b>those [72]</b> 10/21 11/2  | <b>Thus [1]</b> 78/20        | 143/7 160/4 176/19            | <b>Tribunal [1]</b> 57/25     |
| 34/17 36/22 41/14            | 11/8 15/6 18/10 21/14         | <b>time [95]</b> 6/23 9/1    | <b>topic [8]</b> 4/10 5/1 5/2 | <b>tribute [1]</b> 108/5      |
| 41/24 42/6 42/13             | 23/10 25/1 25/25              | 12/19 15/7 23/1 28/8         | 46/11 46/12 65/7              | <b>tried [4]</b> 97/15 123/24 |
| 42/25 43/12 44/12            | 25/25 26/14 29/13             | 28/17 28/22 30/23            | 69/24 176/12                  | 123/25 165/17                 |
| 44/17 46/5 49/12             | 31/8 38/23 42/19              | 32/13 34/3 40/11             | <b>topics [2]</b> 185/10      | <b>true [10]</b> 8/20 11/17   |
| 50/22 51/5 52/3 54/23        | 43/23 44/10 44/14             | 41/21 42/5 42/9 43/13        | 186/2                         | 11/18 14/20 38/12             |
| 56/21 58/1 59/3 60/22        | 44/14 44/24 45/2              | 44/1 45/16 50/7 50/8         | <b>Torquay [1]</b> 5/13       | 56/3 61/4 107/21              |
| 61/17 61/25 61/25            | 47/25 49/13 49/19             | 50/23 51/8 55/15             | <b>total [1]</b> 97/24        | 150/16 159/23                 |
| 62/20 62/21 64/7             | 49/22 55/21 55/24             | 56/18 61/14 64/21            | <b>touched [2]</b> 92/1       | <b>trust [1]</b> 104/1        |
| 64/19 65/1 67/11 68/4        | 62/17 63/9 63/21 66/2         | 64/21 65/17 67/1 67/6        | 120/25                        | <b>trusted [1]</b> 187/3      |
| 69/19 70/17 70/18            | 66/4 66/4 83/4 83/10          | 68/2 70/2 70/13 70/18        | <b>towards [3]</b> 102/1      | <b>truth [3]</b> 15/14 20/5   |
| 70/19 70/21 72/23            | 83/12 93/15 94/4              | 70/19 71/13 71/17            | 135/19 183/13                 | 107/19                        |
| 73/5 75/11 76/15 80/2        | 97/11 97/17 97/23             | 72/11 72/20 73/12            | <b>tracked [2]</b> 22/20      | <b>try [11]</b> 19/3 48/3     |
| 82/13 83/19 84/3 84/5        | 97/24 99/18 99/21             | 73/14 81/13 84/21            | 36/5                          | 68/24 111/19 114/13           |
| 87/16 87/25 88/20            | 99/22 101/6 101/7             | 87/12 88/4 95/7 95/11        | <b>tracking [3]</b> 42/4      | 116/8 126/3 132/23            |
| 91/17 93/6 94/8 95/10        | 101/12 102/16 102/21          | 96/6 96/17 100/22            | 42/15 43/8                    | 150/15 183/2 186/17           |
| 95/16 96/5 96/12             | 104/2 104/7 105/15            | 102/10 103/24 113/23         | <b>trade [23]</b> 74/12       | <b>trying [16]</b> 14/4 14/6  |
| 96/18 97/15 98/16            | 105/21 108/5 120/4            | 113/25 114/21 117/1          | 74/14 77/4 77/7 77/7          | 14/23 15/11 15/13             |
| 98/21 100/14 101/25          | 120/5 121/10 122/9            | 117/24 119/18 119/21         | 77/10 77/11 77/15             | 16/20 26/19 31/20             |
| 102/3 102/12 105/24          | 122/22 131/3 137/25           | 120/19 121/12 122/8          | 77/17 77/18 77/19             | 32/1 32/3 32/23 32/23         |
| 105/25 106/10 110/22         | 140/25 141/5 147/11           | 122/13 122/14 122/23         | 77/20 77/23 78/23             | 49/11 68/12 125/20            |
| 110/25 112/9 113/13          | 148/17 152/24 165/23          | 123/10 123/11 123/17         | 78/23 78/24 78/25             | 141/10                        |
| 114/2 114/13 116/6           | 169/22 178/7 179/4            | 127/4 128/5 128/12           | 82/16 90/6 91/2 91/7          | <b>TTIP [2]</b> 79/24 79/25   |
| 118/22 119/2 119/3           | 185/1                         | 128/13 131/3 137/7           | 91/9 98/24                    | <b>Tuesday [1]</b> 125/10     |
| 120/2 120/3 120/13           | <b>though [2]</b> 89/11       | 137/25 139/23 141/7          | <b>train [1]</b> 50/11        | <b>turn [15]</b> 17/24 27/9   |
| 120/16 121/12 121/13         | 185/5                         | 142/6 145/15 145/23          | <b>training [14]</b> 50/2     | 37/23 81/1 107/3              |
| 122/10 124/23 126/15         | <b>thought [19]</b> 11/16     | 145/25 146/19 146/25         | 50/15 104/4 104/6             | 107/9 107/16 120/3            |
| 129/1 129/2 129/11           | 12/24 14/11 14/12             | 146/25 152/22 163/1          | 104/11 121/18 122/5           | 132/9 138/13 143/6            |
| 129/12 133/20 135/7          | 32/7 51/17 54/21 62/4         | 163/21 163/23 166/10         | 141/21 142/3 142/10           | 154/14 156/15 158/1           |
| 135/16 135/16 135/25         | 62/5 116/24 132/11            | 167/20 169/5 171/7           | 142/11 142/20 143/4           | 176/12                        |
| 136/10 137/6 137/9           | 134/1 135/19 137/25           | 171/9 171/18 183/25          | 150/13                        | <b>turned [1]</b> 149/4       |
| 137/10 137/17 137/21         | 139/17 140/14 144/3           | <b>times [6]</b> 23/14 35/5  | <b>tranche [2]</b> 117/25     | <b>turning [2]</b> 94/12      |
| 139/7 139/11 141/18          | 171/1 182/24                  | 47/14 126/15 162/19          | 118/1                         | 177/6                         |
| 142/8 143/2 143/18           | <b>thousand [1]</b> 52/10     | 173/2                        | <b>transact [1]</b> 80/3      | <b>two [46]</b> 5/9 8/11 9/5  |
| 143/21 143/24 150/25         | <b>thousands [2]</b> 95/13    | <b>timing [1]</b> 150/25     | <b>transaction [12]</b> 9/11  | 10/21 11/8 11/9 13/1          |
| 153/24 158/2 159/5           | 95/22                         | <b>tirelessly [1]</b> 108/22 | 9/19 16/23 17/1 25/8          | 20/14 29/19 34/12             |
| 160/16 161/2 162/19          | <b>three [16]</b> 6/8 9/10    | <b>title [3]</b> 53/2 93/24  | 25/20 25/22 26/11             | 55/9 55/22 66/19              |
| 166/20 168/9 168/16          | 16/10 16/12 22/19             | 94/3                         | 29/12 31/25 126/19            | 66/22 67/4 68/7 70/3          |
| 168/18 174/21 176/22         | 24/14 24/19 24/23             | <b>titled [1]</b> 144/6      | 126/23                        | 72/14 86/23 94/17             |
| 180/20 182/9 182/13          | 25/1 25/5 25/7 25/18          | <b>today [7]</b> 3/7 44/1    | <b>transactions [19]</b>      | 104/21 104/23 105/14          |
| 182/22 183/11 183/25         | 35/5 36/5 57/19 57/23         | 75/18 92/9 95/18             | 5/25 6/2 6/3 6/14 7/6         | 107/15 117/18 123/19          |
|                              | <b>three' [1]</b> 16/8        | 107/2 144/13                 | 7/16 7/17 8/1 8/3 10/6        | 124/3 126/16 137/2            |

|  |  |  |   |   |
|--|--|--|---|---|
| <b>T</b>   | <b>undertake [2]</b> 79/17 98/5  | 52/24 54/25 58/3 61/9 63/9 63/12 68/12 68/23 71/9 74/3 78/14 78/20 81/3 81/23 86/1 91/24 93/15 97/16 98/10 99/15 99/20 100/4 100/10 101/9 101/11 101/13 101/16 101/19 107/3 110/9 110/14 110/16 111/3 114/12 115/3 115/4 115/6 115/18 115/25 118/8 118/10 120/7 120/23 124/16 126/5 126/8 128/18 129/4 139/17 141/13 141/24 147/8 148/15 148/17 151/22 155/11 159/25 165/21 166/11 167/12 174/16 178/13 179/15 182/9 | 64/20 143/2   | <b>vote [5]</b> 108/16 161/24 162/1 162/7 163/1 |
| <b>two... [17]</b> 137/4 137/6 143/11 147/11 149/15 150/10 151/9 166/25 171/20 171/24 172/16 175/1 175/2 185/8 185/9 185/10 186/2  | <b>undertaking [2]</b> 79/18 174/15  |  | <b>voted [2]</b> 162/8 162/8  |   |
| <b>two paragraphs [3]</b> 10/21 13/1 147/11  | <b>undertakings [1]</b> 75/5   |  | <b>vs [1]</b> 126/13  |   |
| <b>tying [2]</b> 10/3 150/9  | <b>undertook [2]</b> 162/9 173/18  |  | <b>W</b>  |   |
| <b>type [7]</b> 27/5 50/2 52/10 57/2 59/5 62/25 172/17   | <b>unexplained [1]</b> 111/13  |  | <b>wages [1]</b> 66/25  |   |
| <b>typed [6]</b> 17/9 17/14 17/22 18/4 18/5 35/2   | <b>unfair [1]</b> 56/5   |  | <b>wait [2]</b> 58/22 120/6   |   |
| <b>types [1]</b> 172/16  | <b>unfairly [1]</b> 86/2   |  | <b>waiting [1]</b> 166/24   |   |
| <b>typical [1]</b> 146/23  | <b>unfortunately [2]</b> 119/10 133/19   |  | <b>waive [2]</b> 177/19 177/20  |   |
| <b>typing [1]</b> 19/20  | <b>unilaterally [3]</b> 148/14 155/20 176/10   |  | <b>Walker [2]</b> 124/18 124/18   |   |
| <b>U</b>   | <b>unincorporated [2]</b> 113/2 118/17   |  | <b>want [33]</b> 3/6 8/9 8/9 20/5 30/25 32/25 34/16 35/25 44/2 47/10 51/24 53/16 55/25 56/5 59/21 66/17 73/1 73/15 74/2 93/1 93/10 112/25 126/14 133/5 140/6 143/11 146/10 159/24 166/10 171/20 172/10 176/12 182/3 |   |
| <b>UK [1]</b> 110/12   | <b>union [55]</b> 39/5 39/19 39/22 40/5 42/5 44/9 46/14 48/11 48/24 49/1 50/2 55/16 55/17 61/20 63/14 65/18 65/20 67/7 67/11 67/13 68/9 68/25 69/2 69/10 70/1 70/13 75/12 76/14 77/7 77/10 77/18 77/18 77/19 77/20 78/23 78/24 82/22 82/22 83/17 89/22 90/6 91/2 91/7 92/5 95/12 96/14 97/8 97/11 97/16 97/17 97/24 97/25 98/1 98/24 101/1 | <b>update [4]</b> 85/7 154/21 175/1 175/4  | <b>wanted [27]</b> 8/21 9/1 17/21 30/24 33/18 34/25 35/24 56/5 56/6 56/12 100/23 103/6 114/12 114/24 115/21 122/17 132/17 134/3 136/21 140/15 140/16 140/20 155/25 165/20 177/20 183/5 184/20                       |   |
| <b>UKGI [1]</b> 82/6   | <b>unionist [1]</b> 91/9   | <b>updated [2]</b> 8/14 50/25  | <b>wanting [1]</b> 14/24  |   |
| <b>ultimately [1]</b> 110/5  | <b>unions [9]</b> 65/18 66/4 71/2 72/10 72/24 73/14 74/12 74/15 78/25  | <b>upheld [1]</b> 2/15   | <b>wants [1]</b> 75/12  |   |
| <b>Um [1]</b> 77/8   |  | <b>upon [8]</b> 2/7 2/14 38/17 46/24 53/4 57/12 63/2 161/25  | <b>Ward [18]</b> 1/5 1/7 1/10 1/12 2/25 3/4 7/2 8/18 19/14 24/6 26/21 27/3 30/9 35/2 36/11 36/15 36/20 188/2  |   |
| <b>unable [1]</b> 91/21  |  | <b>upset [1]</b> 170/18  | <b>Warmington [16]</b> 112/19 114/3 115/2 119/17 125/7 125/24 126/7 126/12 138/6 139/7 139/12 139/23 141/1 150/11 175/18 176/15   |   |
| <b>unacceptable [1]</b> 51/19  |  | <b>urgency [3]</b> 20/23 34/6 175/10   | <b>Warmington's [1]</b> 185/21  |   |
| <b>unaware [1]</b> 35/18   |  | <b>us [51]</b> 1/3 1/5 3/22 6/14 7/7 7/20 15/4 20/5 31/23 32/6 37/6 38/4 54/16 54/22 55/2 56/7 56/12 56/14 56/15 61/22 62/7 62/10 62/10 62/17 63/21 63/22 68/22 68/23 71/4 71/6 71/23 72/3 72/11 73/6 73/18 74/9 82/9 84/14 86/9 89/10 91/1 96/8 109/10 119/15 120/2 120/3 142/22 144/4 169/24 169/25 178/14   | <b>Warnborough [1]</b> 111/10   |   |
| <b>unclear [1]</b> 61/4  |  | <b>usable [1]</b> 180/16   | <b>warned [1]</b> 153/12  |   |
| <b>under [23]</b> 1/23 6/18 47/5 59/19 63/18 65/5 71/21 74/5 76/21 78/1 80/4 85/9 87/20 97/22 148/22 149/16 149/19 150/10 150/12 153/25 154/15 161/8 185/3                                   | <b>Unique [1]</b> 107/7  | <b>use [8]</b> 127/8 127/23 132/5 145/7 152/9 161/25 181/6 181/7   | <b>was [497]</b>  |   |
| <b>underlined [1]</b> 22/21  | <b>Unit [1]</b> 110/9  | <b>used [18]</b> 13/3 16/15 16/15 22/16 47/9 49/21 51/7 55/11 55/21 83/1 103/6 111/10 121/13 124/4 132/9 133/14 136/17 186/12  | <b>wasn't [40]</b> 8/25 11/17 12/2 14/1 14/7 14/23 15/11 15/13 20/1 20/2 26/18 31/11 31/23 35/16 42/13 45/11 48/22 48/23 58/19 62/6 68/10 70/19 72/15 91/5 97/7 101/17 115/4 121/20 129/13 145/18 145/22            |   |
| <b>undermining [1]</b> 145/4   | <b>united [1]</b> 113/4  | <b>useless [2]</b> 9/6 11/5  |   |   |
| <b>understand [29]</b> 2/25 3/1 3/10 12/25 13/1 35/9 44/12 51/23 64/25 72/13 73/8 77/10 77/13 91/1 93/4 96/5 96/24 97/7 97/11 99/3 107/12 108/2 135/2 140/5 142/22 150/14 169/7 179/17 183/5 | <b>unless [4]</b> 63/21 63/22 63/24 177/19   | <b>using [5]</b> 90/5 95/14 121/9 121/18 124/5   |   |   |
| <b>understandable [2]</b> 168/20 169/15  | <b>unlikely [2]</b> 52/1 168/18  | <b>usual [4]</b> 5/22 78/22 78/24 153/15   |   |   |
| <b>understanding [23]</b> 43/2 67/1 68/14 68/19 72/1 72/10 75/18 76/23 80/25 92/10 113/24 117/24 118/2 128/21 136/1 136/12 136/13 136/14 136/20 150/2 157/19 158/18 177/8                    | <b>unnoticed [1]</b> 108/14  | <b>usually [3]</b> 52/14   |   |   |
| <b>understood [3]</b> 19/3 40/25 162/21  | <b>unpaid [1]</b> 108/13   |  |   |   |
|  | <b>unsafe [3]</b> 131/16 131/17 131/19   |  |   |   |
|  | <b>unseen [1]</b> 108/8  |  |   |   |
|  | <b>unsuccessful [1]</b> 179/9  |  |   |   |
|  | <b>unsung [1]</b> 108/8  |  |   |   |
|  | <b>until [13]</b> 36/17 58/3 84/9 98/10 103/17 108/20 109/10 120/1 136/2 136/7 165/12 184/17 187/25  |  |   |   |
|  | <b>up [78]</b> 5/1 7/21 8/13 9/3 13/14 15/23 15/24 19/17 21/6 32/16 32/23 34/19 45/7 46/1  |  |   |   |

|  |   |  |   |   |
|--|---|--|---|---|
| <b>W</b>   | 69/5 69/6 72/11 73/19<br>76/5 87/13 89/4 91/15<br>92/25 93/14 97/1<br>98/17 98/21 99/12<br>101/16 102/14 103/16<br>104/7 107/11 110/8<br>111/24 112/3 117/14<br>120/2 129/3 135/7<br>136/25 139/7 143/18<br>147/14 152/17 152/24<br>155/2 156/5 158/1<br>159/8 168/1 168/8<br>177/3 178/17 187/5<br>187/8   | 48/19 50/4 51/21<br>55/23 63/11 67/17<br>70/24 80/18 89/7 92/3<br>98/23 99/16 101/10<br>103/20 105/22 113/14<br>127/8 127/11 129/11<br>132/12 137/3 137/14<br>141/20 144/14 144/14<br>150/15 151/7 151/8<br>152/9 155/19 155/21<br>155/25 157/9 157/17<br>157/19 158/14 159/19<br>159/24 161/2 161/12<br>162/13 162/15 166/21<br>169/21 170/2 171/25<br>172/20 172/24 173/12<br>174/14 180/17  | 114/20 117/7 117/20<br>122/1 122/10 124/1<br>126/12 127/3 130/5<br>130/24 131/4 131/5<br>131/25 132/12 132/19<br>134/8 138/14 140/5<br>141/22 144/7 145/11<br>146/21 147/8 147/11<br>152/21 155/3 157/13<br>158/3 160/18 163/4<br>164/9 164/24 165/22<br>166/6 166/12 169/4<br>170/19 170/25 171/4<br>173/21 176/17 177/18<br>181/17 182/11 182/19<br>184/22 185/4 185/15<br>186/9 186/19 | 35/11 36/1 36/6 47/22<br>47/24 51/17 53/8<br>62/12 65/13 68/21<br>73/12 74/13 77/15<br>94/7 96/23 97/25<br>123/16 125/22 126/4<br>130/22 132/9 150/9<br>152/16 162/18 168/12<br>169/6 |
| <b>wasn't... [9]</b> 147/10<br>157/16 159/13 159/19<br>165/24 171/9 173/7<br>184/17 184/23   | <b>well-known [1]</b> 110/8   | <b>while [3]</b> 57/13 79/23<br>131/22   | <b>wide [4]</b> 45/2 79/21<br>137/1 137/24  |   |
| <b>Watt [6]</b> 88/20 89/2<br>95/3 95/4 100/8<br>188/12  | <b>went [16]</b> 21/12 29/3<br>59/14 68/22 90/14<br>100/4 110/12 120/21<br>134/12 148/10 154/17<br>156/14 159/22 178/12<br>183/18 184/18  | <b>whilst [4]</b> 20/23 34/6<br>39/7 89/5  | <b>wider [1]</b> 93/21  |   |
| <b>wavered [1]</b> 109/1   | <b>whereas [2]</b> 67/1<br>121/16   | <b>white [1]</b> 33/25   | <b>will [41]</b> 1/21 2/12<br>2/22 6/15 22/14 36/25<br>38/15 73/17 77/4 78/2<br>78/18 79/19 80/19<br>80/23 84/8 85/23<br>86/23 86/25 89/7<br>99/16 107/24 107/25<br>109/7 109/14 117/21<br>120/2 121/4 122/3<br>143/15 151/11 156/19<br>156/21 157/2 157/4<br>157/22 158/1 162/5<br>169/24 184/21 185/6<br>185/18   |   |
| <b>way [34]</b> 5/1 15/7<br>15/12 19/2 26/7 32/2<br>33/23 33/24 36/9<br>54/25 63/20 88/18<br>89/11 100/17 101/1<br>101/8 103/8 104/14<br>106/1 109/8 111/11<br>113/11 113/13 123/6<br>131/20 136/10 140/21<br>142/11 142/12 149/13<br>165/20 178/20 186/17<br>187/16 | <b>where's [1]</b> 172/7  | <b>whitewash [2]</b> 115/5<br>115/12   | <b>wilkinson [1]</b> 110/14   |   |
| <b>ways [1]</b> 91/11  | <b>wherever [1]</b> 173/3   | <b>who [75]</b> 2/9 2/21<br>17/24 22/25 31/14<br>36/17 39/9 39/12 40/4<br>41/17 42/16 43/14<br>48/4 48/11 49/22 50/3<br>50/13 52/20 53/23<br>55/12 57/21 58/3<br>62/16 65/3 65/19<br>65/20 65/23 65/25<br>69/21 75/11 77/14<br>82/14 86/2 93/15<br>93/20 94/23 98/8<br>98/15 99/7 101/6<br>102/16 102/17 103/14<br>104/7 104/13 104/24<br>105/10 105/11 108/5<br>109/9 123/1 129/15<br>130/25 131/18 133/24<br>139/6 139/9 140/25<br>141/10 143/19 147/14<br>150/9 150/18 165/21<br>169/24 169/24 176/5<br>178/7 178/10 178/14<br>179/7 179/20 182/16<br>185/6 187/1 | <b>Wilson [2]</b> 141/23<br>142/1   |   |
| <b>we [383]</b>  | <b>whether [43]</b> 2/14<br>2/23 8/22 41/6 42/20<br>43/2 43/5 43/6 43/9<br>47/15 53/6 54/3 71/2<br>71/5 73/15 73/24<br>82/21 89/2 98/12<br>98/13 115/23 116/8<br>122/4 133/16 137/11<br>138/2 141/20 145/7<br>147/19 148/24 155/9<br>156/1 156/20 159/11<br>159/25 160/6 161/6<br>161/19 161/22 162/14<br>165/7 171/12 186/23   | <b>who'd [4]</b> 59/4 123/2<br>141/12 160/25   | <b>win [1]</b> 179/21   |   |
| <b>we'd [7]</b> 50/10 64/22<br>72/24 125/22 128/25<br>152/22 162/20  | <b>which [149]</b> 1/14<br>1/15 2/9 3/13 5/20<br>6/18 9/5 10/24 11/16<br>14/18 17/10 18/9<br>20/25 21/3 21/16 22/9<br>23/1 23/2 24/19 27/10<br>29/13 29/19 29/20<br>34/8 34/22 35/2 37/20<br>40/9 42/6 46/12 46/13<br>47/19 48/14 50/25<br>51/10 51/12 52/5<br>52/16 52/20 53/25<br>54/5 54/7 56/18 58/11<br>59/5 60/6 60/19 61/6<br>64/1 64/9 64/14 64/25<br>65/7 67/4 67/13 67/25<br>68/7 68/14 68/21<br>69/24 70/24 73/5 73/8<br>73/23 75/5 76/9 77/15<br>79/12 80/9 80/17<br>81/18 82/20 82/20<br>82/23 83/1 83/19<br>84/22 86/25 87/9<br>87/20 87/20 89/14<br>90/21 93/5 94/4 94/7<br>97/21 97/22 98/7 99/5<br>99/14 100/18 101/18<br>103/8 107/15 112/18<br>113/4 114/12 114/16 | <b>whoever [2]</b> 73/17<br>73/20  | <b>wish [6]</b> 2/6 2/9 2/21<br>88/11 107/12 185/7  |   |
| <b>we'll [15]</b> 12/6 36/21<br>38/4 42/11 77/2<br>106/11 109/15 114/16<br>119/14 152/25 153/7<br>167/2 167/15 176/20<br>185/15  | <b>what [197]</b>   | <b>whole [6]</b> 63/9 97/8<br>105/6 113/17 144/16<br>183/2   | <b>wishing [2]</b> 99/25<br>178/5   |   |
| <b>we're [20]</b> 3/16 5/6<br>34/21 38/25 54/16<br>54/17 54/19 61/4<br>68/23 68/23 73/18<br>75/23 84/22 89/1<br>101/10 104/21 129/3<br>130/16 169/25 174/22  | <b>what's [5]</b> 91/11<br>91/13 125/13 138/15<br>174/13  | <b>whom [6]</b> 45/9 60/7<br>87/11 110/19 118/11<br>118/17   | <b>withheld [1]</b> 181/1   |   |
| <b>we've [17]</b> 5/18 17/17<br>21/20 21/23 22/3 22/3<br>32/19 33/9 57/1 62/10<br>73/21 88/16 108/23<br>152/20 152/20 163/3<br>184/12  | <b>whatever [5]</b> 30/14<br>53/2 59/20 131/12<br>165/14  | <b>why [41]</b> 7/25 8/3<br>9/10 11/24 13/22<br>14/10 14/16 16/23<br>17/7 19/25 25/7 30/10<br>31/1 31/16 34/21   | <b>within [18]</b> 6/15<br>29/24 32/17 40/4 42/4<br>53/6 65/16 66/4 69/1<br>83/23 87/17 91/1 94/2<br>98/7 105/14 147/20<br>180/13 183/7   |   |
| <b>website [2]</b> 67/12<br>107/25   | <b>whatsoever [5]</b> 114/1<br>115/3 123/3 134/21<br>138/12   |  | <b>without [11]</b> 99/25<br>123/22 124/9 130/21<br>133/15 138/5 150/17<br>171/3 176/10 178/5<br>180/22   |   |
| <b>Wednesday [5]</b> 41/12<br>47/18 55/12 105/3<br>105/8   | <b>when [72]</b> 1/22 3/15<br>14/22 22/7 31/16<br>38/20 40/11 41/13<br>45/8 50/23 55/20 57/5<br>57/15 57/15 57/16<br>57/17 58/24 65/9 67/6<br>67/8 70/3 70/13 72/20<br>84/23 84/24 95/11<br>95/15 99/12 102/9<br>102/15 103/13 104/16<br>109/22 110/2 110/18<br>112/1 113/19 119/5<br>119/21 122/13 130/23<br>131/2 131/9 136/13<br>137/23 139/13 140/16<br>140/18 141/5 141/15<br>149/25 150/6 154/13<br>155/21 158/18 158/20<br>164/3 164/12 164/15<br>164/23 165/6 165/15<br>166/3 166/16 167/4<br>167/19 170/19 176/16<br>179/6 182/4 183/16<br>184/9   |  | <b>WITN00550100 [1]</b> 107/8   |   |
| <b>week [2]</b> 41/12 52/22  | <b>where [61]</b> 3/15 3/17<br>5/10 18/2 18/18 19/8<br>20/5 20/22 22/18 47/2  |  | <b>WITN00550101 [1]</b> 117/6   |   |
| <b>weekly [2]</b> 41/8 59/8  |   |  | <b>WITN00550103 [1]</b> 142/25  |   |
| <b>weight [1]</b> 127/11   |   |  | <b>WITN01050200 [1]</b> 185/23  |   |
| <b>well [73]</b> 8/21 11/9<br>11/19 13/24 14/22<br>15/17 17/7 17/12<br>17/17 18/4 18/16<br>18/23 26/2 26/9 27/12<br>27/23 30/5 30/13 31/9<br>31/15 31/18 32/11<br>33/24 36/19 36/25<br>45/25 53/23 61/23<br>65/22 66/13 68/22  |   |  | <b>WITN06370200 [2]</b> 46/17 81/24   |   |

|          |   |  |   |  |
|----------|---|--|---|--|
| <b>W</b> | 148/24 149/5 149/12<br>149/20 149/25 150/2<br>150/13 151/13 152/2<br>152/8 152/15 153/7<br>155/18 155/21 156/1<br>157/4 157/8 157/13<br>157/20 157/22 158/8<br>158/13 158/16 158/22<br>159/2 160/6 160/13<br>161/23 161/24 162/7<br>162/10 162/13 163/22<br>164/2 164/10 164/22<br>165/3 165/6 165/14<br>166/10 173/1 176/9<br>184/9 186/16<br><b>workplace [1]</b> 69/22<br><b>worried [1]</b> 133/14<br><b>worry [1]</b> 134/2<br><b>worth [4]</b> 14/8 20/20<br>121/3 124/5<br><b>would [235]</b><br><b>wouldn't [22]</b> 6/23<br>14/18 17/16 18/5<br>32/22 34/19 46/2<br>58/10 61/21 62/12<br>63/19 64/12 64/22<br>100/21 104/1 119/18<br>120/17 135/21 162/23<br>178/23 178/25 180/23<br><b>write [4]</b> 7/8 56/14<br>62/10 183/22<br><b>writer [2]</b> 185/13<br>185/17<br><b>writing [3]</b> 24/13<br>24/21 173/19<br><b>written [7]</b> 18/12<br>107/2 128/25 138/8<br>162/10 164/19 174/1<br><b>wrong [7]</b> 86/14<br>104/25 116/8 120/21<br>143/15 170/13 180/2<br><b>wrongly [4]</b> 109/10<br>113/5 131/13 133/7<br><b>wrote [2]</b> 23/14 27/9<br><b>www.cwu.org [1]</b><br>67/18<br><b>www.cwu.org/postm</b><br><b>asters [1]</b> 67/18<br><b>Wyn [1]</b> 186/3 | 50/15 53/7 55/2 56/12<br>56/20 59/18 59/23<br>66/11 68/5 69/14 70/6<br>71/5 72/23 73/6 75/11<br>95/20 95/22 95/24<br>96/8 101/12 102/8<br>102/21 102/22 104/10<br>177/14<br><b>year [8]</b> 37/18 38/8<br>72/8 119/4 153/15<br>174/11 174/11 174/19<br><b>years [16]</b> 30/13<br>45/24 46/9 50/25<br>56/24 57/18 68/15<br>70/25 71/1 93/3 96/20<br>108/23 108/25 134/3<br>152/25 174/6<br><b>yellow [3]</b> 11/17 18/9<br>176/3<br><b>yes [180]</b> 1/4 1/6 1/9<br>1/17 2/19 2/19 3/1<br>3/11 5/19 6/19 6/20<br>9/17 9/22 11/3 11/6<br>12/11 14/23 16/18<br>16/19 19/18 20/3 21/9<br>21/10 21/22 21/25<br>22/1 22/6 22/8 22/17<br>22/21 22/23 23/2 23/3<br>23/11 23/12 24/3 24/4<br>24/10 24/21 24/23<br>24/24 25/2 26/15<br>26/25 27/8 27/23 28/3<br>28/7 28/10 28/19 29/9<br>30/2 31/2 33/18 33/23<br>35/9 36/18 36/22 37/2<br>37/7 37/9 37/25 38/6<br>38/11 39/23 40/14<br>41/23 42/23 50/6 52/7<br>57/11 60/3 60/5 60/12<br>70/17 71/18 76/8<br>81/20 84/8 84/15<br>84/23 86/8 86/8 86/10<br>86/20 87/8 87/13<br>87/14 88/15 88/21<br>89/4 89/8 94/22 95/7<br>95/16 99/23 100/6<br>101/8 102/20 102/21<br>103/4 104/20 105/19<br>105/20 106/6 106/10<br>106/12 106/21 107/6<br>107/14 107/17 108/3<br>110/23 112/2 112/8<br>112/14 116/12 116/21<br>117/8 117/16 118/14<br>119/8 119/13 119/23<br>125/4 125/6 125/12<br>126/10 127/6 127/17<br>128/24 129/11 129/13<br>130/2 139/2 139/24<br>140/11 140/24 144/9<br>144/11 145/25 146/3<br>146/9 148/19 149/11<br>150/8 151/19 153/23<br>154/6 154/13 156/3 | 156/25 159/3 159/4<br>161/15 162/17 163/2<br>163/16 164/9 166/18<br>166/24 167/10 168/2<br>169/3 169/18 170/10<br>172/3 175/3 177/2<br>177/10 178/19 179/23<br>180/11 180/16 181/11<br>182/6 184/11 186/1<br>187/22 187/23<br><b>yet [4]</b> 129/21 174/2<br>175/9 183/11<br><b>you [835]</b><br><b>you'd [11]</b> 3/20 19/2<br>32/18 45/15 59/3<br>102/3 102/12 108/2<br>120/18 123/21 142/6<br><b>you'll [3]</b> 125/10<br>168/14 185/24<br><b>you're [35]</b> 2/16 5/6<br>6/6 7/6 13/16 16/20<br>22/7 24/13 32/5 44/12<br>48/5 49/5 49/8 53/25<br>64/2 64/25 68/22<br>73/15 89/21 89/22<br>91/21 92/23 92/25<br>93/13 93/14 99/3<br>119/12 119/17 131/6<br>154/10 163/4 166/14<br>172/12 175/25 185/13<br><b>you've [37]</b> 12/17<br>15/3 16/11 17/4 17/9<br>18/16 27/21 29/5<br>29/16 29/25 37/20<br>39/17 39/24 41/24<br>50/24 52/24 54/5<br>54/23 55/5 59/1 60/13<br>67/12 82/8 84/17 92/8<br>93/17 94/7 95/25 96/4<br>98/17 102/3 123/17<br>125/10 139/20 165/24<br>166/7 167/3<br><b>your [178]</b> 2/13 2/14<br>3/8 4/11 6/1 6/15 7/3<br>7/9 7/10 7/15 8/14<br>13/6 15/16 16/8 19/4<br>20/10 21/21 22/7<br>22/15 23/7 24/7 26/21<br>27/9 27/14 27/21<br>28/17 28/20 29/5 30/4<br>32/18 32/25 33/6<br>34/12 34/14 35/14<br>36/20 37/15 38/1 38/5<br>38/13 38/15 38/18<br>39/2 39/7 39/24 39/25<br>40/10 41/21 41/25<br>42/13 43/9 45/8 45/16<br>46/2 46/16 46/24 47/6<br>48/3 48/9 48/18 48/20<br>50/21 51/18 53/11<br>54/3 57/9 57/21 59/25<br>61/13 61/18 62/8 63/2<br>66/8 69/1 70/2 75/13<br>75/14 75/17 75/24 | 78/23 81/23 82/15<br>84/17 84/17 87/6<br>87/17 90/6 91/1 91/15<br>91/16 92/3 92/8 94/7<br>94/8 95/12 96/23 97/2<br>99/25 101/1 101/2<br>102/1 104/2 104/4<br>104/13 106/24 107/8<br>107/19 107/22 107/24<br>109/17 111/1 111/9<br>112/6 112/16 113/2<br>115/6 115/15 115/25<br>116/1 117/6 117/24<br>118/3 120/23 122/14<br>122/23 123/10 125/2<br>125/13 127/4 128/18<br>128/22 131/18 132/20<br>133/20 133/21 136/5<br>136/14 139/16 139/20<br>139/22 141/8 141/24<br>142/15 142/18 142/20<br>143/3 143/21 144/21<br>145/6 145/8 146/12<br>148/7 149/9 150/4<br>153/3 153/4 155/11<br>158/5 158/12 159/5<br>162/25 166/11 167/2<br>169/1 170/15 171/22<br>172/16 177/8 177/13<br>181/4 181/8 182/7<br>184/8 185/4 186/4<br>186/15 187/8 187/10<br><b>yourself [3]</b> 32/21<br>96/23 131/3 |
|          | <b>Y</b>  |  | <b>Z</b>  |  |
|          | <b>yeah [65]</b> 6/10 7/12<br>9/17 9/17 9/22 9/25<br>10/3 10/16 10/19<br>10/19 10/23 10/25<br>11/3 12/16 12/21<br>12/24 12/24 13/8<br>13/11 14/22 15/5<br>16/17 16/22 17/20<br>17/20 18/5 19/18<br>19/23 21/22 22/1 22/6<br>22/17 23/23 25/12<br>25/17 26/2 27/23<br>41/17 44/18 45/2   |  | <b>zero [7]</b> 8/1 8/3 9/10<br>9/19 16/23 25/7 30/10<br><b>zoom [1]</b> 4/19   |  |