

Wednesday, 3 July 2024

1
 2 (9.48 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:** May I call Tim Parker, please?
 6 **SIR WYN WILLIAMS:** Of course.
 7 **TIMOTHY CHARLES PARKER (affirmed)**
 8 **Questioned by MR BEER**
 9 **MR BEER:** Sir, before I ask questions of Mr Parker, I should
 10 say that there is a fire alarm drill today at 10.00 and,
 11 in accordance with our usual practice, we're going to
 12 sit through it.
 13 **SIR WYN WILLIAMS:** Sure.
 14 **MR BEER:** Thank you.
 15 Good morning, Mr Parker.
 16 **A.** Morning.
 17 **MR BEER:** My name is Jason Beer and I ask questions on
 18 behalf of the Inquiry. Can you tell us your full name,
 19 please?
 20 **A.** My name is Timothy Charles Parker.
 21 **Q.** Thank you. You've provided kindly a witness statement
 22 for us which is 136 pages long, the URN for that is
 23 WITN00690100. You should have a hard copy in front of
 24 you there. Can you turn up, please, page 126. Do you
 25 have that?

1

1 Chairman of the Post Office from 1 October 2015 until
 2 September 2022 so about seven years; is that correct?
 3 **A.** Correct, yes.
 4 **Q.** You took over after Alice Perkins was Chair of the Post
 5 Office, albeit there was an interim chair?
 6 **A.** That's correct too.
 7 **Q.** At the same time, I think you were Chair of Samsonite.
 8 I think you became Chair of Samsonite in 2014; is that
 9 right?
 10 **A.** I was, in fact, Chair and Chief Executive of Samsonite
 11 from 2008 until 2014 and then I stepped down as CEO and
 12 remained as Non-Exec Chair.
 13 **Q.** So Chair of Samsonite from 2014 until the present day?
 14 **A.** Today, yeah.
 15 **Q.** Yes, and so concurrently with your term in the Post
 16 Office for seven years?
 17 **A.** Correct.
 18 **Q.** You were concurrently Chair of the National Trust,
 19 I think, from 2014 to 2022; is that right?
 20 **A.** That's also correct.
 21 **Q.** So, again, concurrently with you being the Chair of Post
 22 Office?
 23 **A.** Indeed.
 24 **Q.** From April 2018, I think you were Chair of Her
 25 Majesty's -- now His Majesty's -- Courts and Tribunal

3

1 **A.** I do.
 2 **Q.** Do you see in paragraph 268(iii), it says "POL
 3 appointing a criminal with extensive experience to work
 4 alongside Brian Altman QC"?
 5 **A.** I do.
 6 **Q.** Should have that have the word "silk" inserted between
 7 the word "criminal" and "with"?
 8 **A.** Most certainly.
 9 **Q.** So that, rather than the Post Office appointing
 10 a criminal, the Post Office would appoint a criminal
 11 silk?
 12 **A.** Absolutely. Correct.
 13 **Q.** Thank you very much. Can we go to the last page,
 14 please, which is page 136. Is that your signature?
 15 **A.** It is.
 16 **Q.** With that correction brought into account, are the
 17 contents of the witness statement true to the best of
 18 your knowledge and belief?
 19 **A.** They are indeed.
 20 **Q.** Thank you very much. It's a very detailed witness
 21 statement of 136 pages, it will be uploaded to the
 22 Inquiry's website and therefore I'm not going to ask you
 23 questions about all parts of it.
 24 **A.** Okay.
 25 **Q.** Can I start with your background, please. You were

2

1 Service until 2022; is that right?
 2 **A.** That's also right.
 3 **Q.** So concurrently with your chairmanship of the Post
 4 Office for a period of four years?
 5 **A.** Correct.
 6 **Q.** Thank you. Can you tell us in general terms your view
 7 of the company, the Post Office Limited, that you
 8 inherited when you took over as Chair in October 2015?
 9 **A.** Yeah. The Post Office has a turnover of just under
 10 £1 billion, which makes it a sort of medium-sized
 11 company, but in fact it is an incredibly complex
 12 business: it's complex because it operates a network of
 13 around 11,500 sites; it's complex because it has a very
 14 wide range of products; it's complex also because it
 15 deals with cash, and cash has a big security element to
 16 it; it's complex because it's in the public sector.
 17 So this is an organisation that is incredibly
 18 complicated and at the same time faced some very
 19 significant commercial challenges. Sorry, I'm going on
 20 a bit here but it's quite important that I can set the
 21 scene to the Post Office.
 22 This is a business which had absorbed billions of
 23 pounds of taxpayers money and was still losing money.
 24 It was a business that faced significant challenges
 25 because it had an exclusive arrangement with the Royal

4

1 Mail, and the Royal Mail itself was suffering from
 2 increasing competition in the parcels market and
 3 a declining letters market.

4 The Post Office had previously had a significant
 5 amount of business from the Government, so driving
 6 licences, benefits, that kind of thing. That had all
 7 moved online and so the Post Office was bereft
 8 a significant chunk of its contribution.

9 The Post Office had a range of products which it
 10 attempted to sell, with varying degrees of success, and
 11 it also had a very complex structure in terms of its
 12 overheads and management. So when I turned up, I felt
 13 and I believed that I could somehow help to improve
 14 an organisation that was in -- I don't think it's any
 15 exaggeration to say it was in deep crisis.

16 **Q.** Thank you. I think it's right that, before you took up
 17 your position, you made enquiries as to the accounts or
 18 figures of the Post Office before accepting the role; do
 19 you remember that?

20 **A.** I don't but I probably would have done.

21 **Q.** Let's look at some emails to jog your memory if we can,
 22 please. UKGI00019884. If we look at the second page,
 23 please, and the bottom half of the page. That's it.
 24 This is an email not sent to or by you, but it's about
 25 something that you are said to have said. It's from

5

1 note that Tim Parker expressed an interest in seeing
 2 some more up-to-date figures on Post Office before
 3 accepting the role, if he were to be offered it. We
 4 believe this is just thoroughness on his part -- he
 5 needs to be confident what he is getting into -- and we
 6 are following this up with Post Office and with the
 7 public appointments assessor so that we can answer his
 8 queries ..."

9 Then I'm not going to read the third paragraph.

10 **A.** Mm, mm.

11 **Q.** What were your concerns about the finances of the Post
 12 Office; what were you concerned about getting yourself
 13 into?

14 **A.** Well, as I think I've described to you, it was, I felt,
 15 in a very difficult situation, compounded by the fact
 16 that it relied, obviously, on agreeing financing,
 17 usually on an annual basis, with the Government, and
 18 needed a subsidy really to keep everything in order. So
 19 I mean, I -- I thought it was a difficult situation and
 20 it certainly wasn't going to be very easy but I felt
 21 that, however things turned out, the Government would
 22 obviously need to stand behind the Post Office and so
 23 I would be trying to help the Executive Team tackle
 24 things from the commercial end of the business with the
 25 customer and, at the same time, try to manage the

7

1 Laura Thompson, who was an assistant director within
 2 ShEx, the Shareholder Executive?

3 **A.** Sure.

4 **Q.** It's to the, essentially, private office of the then
 5 Secretary of State, Sajid Javid, and you'll see it's
 6 dated 17 June 2015 --

7 **A.** Mm-hm.

8 **Q.** -- so three or four months before you took the post?

9 **A.** Mm-hm.

10 **Q.** If we just read it:
 11 "We spoke -- Baroness Neville-Rolfe ..."
 12 Who I think you'll remember was the relevant
 13 minister at the time?

14 **A.** Mm-hm.

15 **Q.** "... met the two appointable candidates earlier today.
 16 We spoke to the Minister after her meeting. She
 17 confirmed that she would be happy to appoint Tim Parker
 18 to the role but did not feel Simon Burke was suitable --
 19 while he had some very good experience, he did not give
 20 her the confidence that he would be a strong chair, she
 21 felt she would need more support from Government in
 22 steering the business."
 23 Then the second paragraph:
 24 "I would be grateful if you could therefore seek the
 25 Secretary of State's views on the appointment. Please

6

1 Government and its willingness to finance the Post
 2 Office.

3 **Q.** So is this is an oblique reference, then, to whether the
 4 Government would continue properly to subsidise the Post
 5 Office?

6 **A.** Yeah, I believe that post offices are very politically
 7 sensitive and keeping a network is usually of
 8 significant importance to ministers. So I always felt
 9 that, you know --

10 **Q.** If you just pause there.
 11 *(Pause for fire alarm test)*
 12 Mr Parker, you just said:
 13 "I believe that post offices are very politically
 14 sensitive and keeping a network is usually of
 15 significant importance to ministers. So I always felt
 16 that ..."

17 **A.** Yes, and I was going to go on and say so I always felt
 18 that, although there would be some very difficult
 19 discussions, the Post Office would always be there in
 20 some form or another. The challenge was to try to,
 21 essentially, make it more sustainable.

22 **Q.** When you were essentially doing this pre-appointment due
 23 diligence, were any concerns expressed to you about the
 24 performance and capabilities of the then CEO?

25 **A.** I don't recall that being expressed to me at the time.

8

1 Q. Can we look, please, at UKGI00042677. This is
2 a presentation about Post Office Limited Senior
3 Management to the Risk and Assurance Committee of the
4 Department for Business, Innovation and Skills and the
5 Shareholder Executive. You'll see it's dated February
6 2014, so a year and a half or so before your
7 appointment?

8 A. Mm, mm, mm.

9 Q. Can we turn, please, to the second page, and do you see
10 down the left-hand side, underneath the number 1:

11 "Advice from the recent Annual Review suggested that
12 the [Post Office] team give careful consideration to the
13 continued suitability of Paula Vennells as CEO."

14 A. Mm.

15 Q. "There is a general consensus that Paula is no longer
16 the right person to lead the Post Office but
17 justification is anecdotal. This short paper aims to
18 examine the options available to the [Shareholder
19 Executive]."

20 Was anything like that brought to your attention
21 upon your appointment?

22 A. Not that I can recall.

23 Q. Can we go forwards, please, to page 6. Again, on the
24 left-hand side, I should say there's a series of options
25 in this paper, one of which is removal of Ms Vennells

9

1 have been 2015, so we're talking nine years ago, I can't
2 recall a conversation that I had about the capability of
3 Paula Vennells at the time I became chair.

4 Q. Would you expect, as the incoming chair, to be told, by
5 the outgoing chair, that she had questioned the Chief
6 Executive's performance as Chief Executive?

7 A. I think it's obviously of some value if, when you arrive
8 in a business, you are well appraised of the views of
9 your key shareholders, whether it's a publicly owned
10 business or not.

11 Q. That's a statement in general terms. I'm asking: were
12 you, in fact, told by or on behalf of the outgoing chair
13 of this view that is recorded here that she held in
14 relation to Paula Vennells?

15 A. The honest answer to that is I can't remember.

16 Q. Was there a handover?

17 A. I met Alice for lunch before I began.

18 Q. Was that handover?

19 A. As far as I can recall, that was the conversation that
20 I had with her.

21 Q. Was there anything more formal than lunch, in terms of
22 a handover?

23 A. Again, I'm sorry not to be of more help but I can't
24 recall.

25 Q. When you walked into the company we saw that you did

11

1 and this is the slide that addresses this issue. On the
2 left-hand side:

3 "There is a general feeling that Paula is not the
4 optimal person to lead [the Post Office] to develop its
5 commercial strategy.

6 "Paula has not been able to establish good working
7 relationships with Jo Swinson.

8 "She has been unable to retain key staff."

9 Then on the right-hand side, "Performance as CEO and
10 delivery of strategic plan":

11 "[Post Office] failed to deliver its 2010 strategic
12 plan, and refused to keep [Government] properly
13 appraised of developments in the [Network

14 Transformation] programme, requiring difficult revisions
15 in 2013. She has shown a worrying lack of knowledge
16 about the detail of the new plan.

17 "Paula's people management has caused concern as she
18 appears unable to work with personalities and approaches
19 that differ from hers, and has failed to build
20 relationships with key Directors.

21 "Paula's performance as CEO has been questioned by
22 the [Post Office] Chair, and by members of the Board."

23 Were you aware of this view held by the department
24 and/or ShEx when you joined the company?

25 A. To be honest, I mean, looking back from here, this would

10

1 some work in the months before your actual appointment.
2 Did you make any enquiries about this issue, namely the
3 performance of the CEO and/or the Board's view of her
4 and/or the shareholders' view of her?

5 A. I can't recall. Can I make a comment on that? Because
6 it has struck me, and this is something I hope might be
7 of use to the Inquiry, that whether or not I received
8 a view or whether I took on board a view, it is very
9 important that when you take over as chair, that you are
10 well appraised and you understand, as best as possible,
11 the views, positive and negative, of the CEO. This,
12 I think, can help to frame things. As far as I can
13 recall -- and I've got quite a lot of experience working
14 with CEOs and I've been a CEO for over 30 years --
15 I mean, my take was that the business had someone who
16 needed some help and assistance and coaching on the
17 commercial front, which is what I aimed to provide
18 Paula.

19 My impression, looking back, was that she was quite
20 well thought of and so much so that, as you probably
21 know, I mean, a few years later she was made a Non-Exec
22 Director of the Cabinet Office, and -- you know, so, my
23 sort of feeling was although -- whatever my own views
24 were of her ability in terms of running a business,
25 I didn't get the impression that there was some enormous

12

1 doubt and, you know, the starter for ten was actually
 2 you need to look at Paula.

3 **Q.** Okay, that was my next series of questions. When you
 4 did become Chair of the business, was anything like this
 5 raised again with you by Government or the Shareholder
 6 Executive?

7 **A.** Yeah, and, again, I'm sorry at this length of time
 8 I simply cannot confirm anything.

9 **Q.** Can we move on, please, by looking at UKGI00005361. At
 10 the moment, I'm just looking at a series of events that
 11 happened before your appointment. If we can go to
 12 page 4, please. This is a series of emails that again
 13 doesn't involve you but there are, within the emails,
 14 comments/views attributed to you and I want to ask you
 15 about them?

16 **A.** Yes.

17 **Q.** Below this page, there's a note about an upcoming
 18 Panorama programme and there was a significant Panorama
 19 programme about Post Office and the Horizon system, due
 20 to air on 17 August 2015. If we go to the bottom of
 21 page 3, please, Alwen Lyons to Richard Callard -- that
 22 will be a name familiar to you -- within the Shareholder
 23 Executive, exchange an email copied to Ms Vennells.
 24 "Richard
 25 "Paula and I are [considering] how and when it is
 13

1 **A.** I have no idea. I mean, at this stage, I'm not sure
 2 what I would have known about Sparrow or indeed what
 3 "pretty robust" actually means. I think probably what
 4 it means is, you know, I obviously had been briefed up
 5 to a point but I wasn't going to say anything negative
 6 or positive at that stage because I was very new, and
 7 maybe that was interpreted as "pretty robust".

8 **Q.** I was about to ask you: on what basis would you have
 9 formed a view two months before you joined the business?

10 **A.** I don't think I would have done.

11 **Q.** Because you hadn't read or received any relevant
 12 information, presumably?

13 **A.** I have no idea but, I mean, I'm not a person generally
 14 who takes a pre-disposed view to anything until I, you
 15 know, have had a chance to understand it properly.

16 **Q.** If we go up the chain, please, to page 1 and the foot of
 17 the page. Later on the 6th, again, Laura Thompson to
 18 Alwen Lyons and Richard Callard:
 19 "I've just come off the call between the Minister
 20 and Tim Parker. Nothing significant to report.
 21 "On Sparrow, the Minister informed Tim that she
 22 would like him to look at things with fresh eyes when he
 23 arrived, which he was happy with. Tim confirmed he
 24 would be happy to meet MPs, etc, on the matter but once
 25 he was up to speed. The Minister mentioned that
 15

1 best to brief Tim on Panorama.

2 "Would you let me know when Baroness Neville-Rolfe
 3 is planning to speak to him, as she was going to mention
 4 Sparrow. Notification re Panorama would come better
 5 after that, as we could refer her to her conversation
 6 and offer a more immediate brief if he would like one."

7 Then further up the page, please, the reply:
 8 "BNR [Baroness Neville-Rolfe] is speaking to him
 9 [that's you] at [2.45 today]. I spoke to him ... He is
 10 pretty robust on Sparrow (ie if we have done nothing
 11 wrong then we stuck to our guns), but is happy to agree
 12 for [Baroness Neville-Rolfe] to say to Bridgen and co
 13 that the new chair will of course take a critical and
 14 independent look at the issue. He did also *offer* to sit
 15 with her in her meeting with Arbutnot, which was
 16 arranged late yesterday for [the 17th] -- we should all
 17 mull that one."

18 So, essentially, consideration is being given as to
 19 how to brief you about an upcoming Panorama programme,
 20 which is very significant for the business. Do you
 21 recall receiving briefings before you formally began
 22 your role a couple of months beforehand?

23 **A.** Candidly not, no.

24 **Q.** It's attributed to you that you are "pretty robust on
 25 Sparrow"; was that your view?
 14

1 Panorama was happening but it wasn't discussed."

2 Then there's another issue about the Audit and Risk
 3 Committee, which I'm not going to ask you about.

4 Do you recollect the Minister, Baroness
 5 Neville-Rolfe, asking you to look at things,
 6 ie connected to Horizon? That's the shorthand for
 7 Sparrow that the Post Office used.

8 **A.** I don't recall. I mean, I presume this is a fair
 9 reflection of what I might have discussed. I mean,
 10 I think she would have just notified me it was an issue.

11 **Q.** Do you have a recollection of going into the job with
 12 a request from the Government to have a fresh look at
 13 Horizon?

14 **A.** I don't recall whether I, as it were, went into the job
 15 but I do know that the letter turned up pretty soon
 16 after I arrived.

17 **Q.** So that's the thing that sticks in your memory, the
 18 letter from Baroness Neville-Rolfe?

19 **A.** I got a letter and it was clear, you know, "Have a look
 20 into these issues". Exactly.

21 **Q.** Okay, we'll come to that in a moment. Can you recall
 22 anything as to what the concern was in Government about
 23 Horizon?

24 **A.** Not specifically.

25 **Q.** Can we move forwards, please, to POL00319054 and if we
 16

1 go to page 2, please, and scroll down. This looks like
 2 the genesis of a briefing note for you about Horizon --
 3 again, it's called Sparrow -- in readiness for your
 4 joining.

5 **A.** Mm.

6 **Q.** We're going to track through what you were told, and if
 7 we just read some parts to it, this is Mark Davies; do
 8 you remember him?

9 **A.** I do.

10 **Q.** The Corporate and Communications Affairs Director --

11 **A.** Mm.

12 **Q.** -- in the Post Office:
 13 "See below ... a first draft of a note for Tim.
 14 "For the last three years [this is the text of the
 15 note] the Post Office has been investigating the cases
 16 of a small number of postmasters ..."
 17 Then we see somebody has added "I WOULD ADD HOW
 18 MANY":
 19 "... who have suggested that the Horizon ... system
 20 used in branches might be faulty.
 21 "They have suggested it may have caused losses in
 22 branch which in some cases led to them being prosecuted
 23 [again added] (AGAIN MIGHT BE WORTH SAYING HOW MANY).
 24 "No evidence has emerged to support these claims:
 25 indeed thorough investigation has underlined that the

17

1 accounting and theft takes place.
 2 "But we only prosecute where there is clear evidence
 3 of wrongdoing and we can meet the bar set for bringing
 4 prosecutions: the evidential and public interest tests.
 5 We do not prosecute people for making mistakes. We
 6 prosecute where people dishonestly cover up the loss of
 7 money."
 8 Then keep scrolling, and the fourth paragraph from
 9 the bottom there:
 10 "The campaign has secured the support of some MPs --
 11 with whom the Post Office has engaged at length -- which
 12 has in turn led to Parliamentary and media activity.
 13 "We have been robust in rejecting the serious
 14 allegations made in Parliament and media, particularly
 15 in recent months. The allegations have suggested
 16 wrongdoing by senior management, bullying, deliberate
 17 cover-up and abuse of prosecutor powers.
 18 "A Panorama programme is due to be aired on
 19 17 August. We have challenged the programme at length
 20 but expect it will go ahead. We have provided detail on
 21 every allegation put to us. We are not appearing on the
 22 programme for interview because the programme is
 23 focusing on individual cases and has not provided
 24 evidence to support its allegations."
 25 Is this the kind of note you would expect to receive

19

1 system is efficient and robust.
 2 "It deals with six million transactions every day
 3 and has been used by almost 500,000 people since it was
 4 introduced: the vast majority doing so without
 5 difficulty.
 6 "The Post Office has nonetheless taken its
 7 responsibilities to its people very seriously. It is
 8 very sorry that this small group of people feel they
 9 have been treated unfairly and has gone to enormous
 10 lengths to get to the bottom of their cases.
 11 "It held a review by independent forensic
 12 accountants, set up a Mediation Scheme overseen by
 13 independent mediators and reign investigated every
 14 complaint in huge detail.
 15 "We have also asked our external lawyers to review
 16 all the cases involving prosecutions.
 17 "Throughout all this no evidence has emerged to
 18 support the very serious allegations being made, which
 19 in some cases have stretched to claims that the Post
 20 Office has abused the prosecution process."
 21 Over the page:
 22 "We do take forward prosecutions where it is right
 23 to do so. Post offices are dealing with public money.
 24 We would be heavily and rightly criticised if we did not
 25 deal with the very small number of cases where false

18

1 as the incoming chair?
 2 **A.** I think it's obviously a note that is designed to tell
 3 a story. And what would I say? I mean, it's a briefing
 4 note obviously told from the perspective of the people
 5 providing the briefing, which is what usually happens
 6 with briefing notes, I have to say.
 7 **Q.** If we just go forward to page 1, please. Just look
 8 briefly at some of the drafting process, foot of the
 9 page.
 10 Alwen Lyons to Mark Davies and General Counsel, Jane
 11 MacLeod:
 12 "I think this is very clear."
 13 She has added some points in capitals:
 14 "I think this note should come from Jane, or Paula
 15 if she wishes, and be sent via me to start getting him
 16 used [that's you] to that way of communicating and to
 17 make it as 'normal' as Sparrow can ever be!"
 18 Then scroll up the page:
 19 "We need to send a note to the new chairman and
 20 I have drafted a first go ... and asked ... for
 21 comments.
 22 "... I would now like ... your comments and whoever
 23 is standing in for Rod?
 24 "Clearly this is about the most important note we
 25 will send on this issue in the weeks ahead so [we] want

20

1 it to be spot on!
 2 "Your input very welcome."
 3 When you were joining, was the Horizon issue, the
 4 Sparrow issue, the most important issue for you?
 5 **A.** I've tried to set the background to the Post Office and
 6 I would say I can't prioritise things exactly. I would
 7 say that this is one of, actually, a number of very
 8 significant and pressing issues.
 9 **Q.** If we go forwards, please, to POL00231055, and if we
 10 just blow that up a little bit, this is a later
 11 iteration of the note --
 12 **A.** Mm.
 13 **Q.** -- after an external lawyer, Andrew Parsons, from Womble
 14 Bond Dickinson -- as I think they were by then -- with
 15 his comments on it. He makes quite limited comments on
 16 the note, we can see one on the right-hand side there.
 17 If we go over to page 2, please -- thank you -- there's
 18 some discussion about destruction of material. The note
 19 said:
 20 "We are not destroying any information that we, and
 21 external lawyers, hold on these cases, as has been
 22 alleged."
 23 Then he commented:
 24 "[The Post Office] has historically destroyed
 25 [information] where it went beyond normal retention

21

1 Then you see the figures have been inserted, 136:
 2 "... that faults in the Horizon computer system were
 3 the cause of losses in their branch. Of these 136
 4 people, 43 have criminal convictions ...
 5 "However, thorough investigation has not produced
 6 any evidence to support the claims: indeed it has
 7 underlined that the system is efficient and robust. In
 8 the cases involving criminal convictions, nothing has
 9 medicine to suggest that any are unsafe."
 10 Then it continues as per the previous draft.
 11 Again, how would you view a document like this? You
 12 described it earlier as a story --
 13 **A.** Mm.
 14 **Q.** -- which might, to my ears, sound as if you're being
 15 wary as to its authorship and it's setting out
 16 a narrative, rather than be completely objective. Is
 17 that what you were intending by the word "story"?
 18 **A.** Not especially. But here's my view, with hindsight,
 19 about one of the main issues with the whole thing, is
 20 that, as I sort of looked at this, it seemed to me that
 21 it was an issue, but of course you ask yourself the
 22 question: well, on how big a scale is this issue? And
 23 of course, what we have here is the Horizon system deals
 24 with 6 million transactions used by 500,000 people. So
 25 it sounds as if you've got a system doing millions of

23

1 periods which means some info is not available for the
 2 CCRC."
 3 Now, of course, you wouldn't see all this
 4 background, would you? You wouldn't see the process by
 5 which the note was created or, indeed, who had
 6 contributed to it, right?
 7 **A.** Yes, I mean, absolutely.
 8 **Q.** You just get the final product?
 9 **A.** I get the final product. Exactly.
 10 **Q.** Let's look at that, then. POL00174396. 11 August 2015,
 11 so nearly two months before you joined the company, from
 12 Alwen Lyons:
 13 "Please find attached a note from Paula, in advance
 14 of the Panorama programme", and then some other
 15 information.
 16 So, ultimately, it's a note from the Chief
 17 Executive --
 18 **A.** Mm.
 19 **Q.** -- being sent to you by Alwen Lyons, the Company
 20 Secretary.
 21 **A.** Mm.
 22 **Q.** If we look at the note itself, POL00174397 -- thank you:
 23 "For the last three years the Post Office has been
 24 investigating claims made by a small number of largely
 25 former postmasters ..."

22

1 transactions and a few people who are complaining, and
 2 that was the sort of perspective that you're drawn to.
 3 What -- and I say this in the spirit of, you know,
 4 this thing ever happens again -- is had we -- had the
 5 thing been put in the context of not just the people who
 6 are complaining but the totality of the people who had
 7 been prosecuted over, you know, whatever it was,
 8 15 years, that would have put a very different
 9 complexion on the note. So if the note had read, you
 10 know, that we have 43 criminal convictions related to
 11 these losses but, actually, over the last however many
 12 years, so many people have been convicted, that would
 13 have told a slightly different story. And I also think
 14 that there could have been more to this potentially
 15 around how many people had been affected through
 16 potentially, you know, any other sort of employment
 17 related issue.
 18 So it's -- we've looked at the Horizon problem from
 19 the point of view of, well, what was -- you know, did
 20 the computer have bugs or whatever? But, actually,
 21 another way of looking at it might have been to say:
 22 we've got an organisation, over 15 years 900 people have
 23 been convicted, or whatever, how does that look? Does
 24 that look statistically sensible? We've had, you know,
 25 so many people who have been terminated, or whatever,

24

1 how does that look, proportionately? So I looked at
 2 this, to be honest, and not only did we have millions of
 3 transactions but I happened to know over the last -- you
 4 know, there were tens of thousands of postmasters and
 5 assistants. So it looked vaguely credible but there was
 6 a sort of a problem that affected, relatively speaking,
 7 quite a small number of people.

8 **Q.** The reflections that you've just given there, are they
 9 things that have occurred to you now in the light of the
 10 events which have happened, rather than things that
 11 occurred to you at the time?

12 **A.** Well, I didn't have that information at the time and,
 13 actually, it was quite late in the day, and I think
 14 quite a lot of people at the Post Office were quite
 15 surprised by how many people had been prosecuted. And
 16 if you look at the sort of list of when the prosecutions
 17 occurred, you go back to, I think -- I looked at this
 18 list, and it sort of, from -- I think it was '98 or '99,
 19 the numbers of people being prosecuted suddenly went up,
 20 so it went up from 20 to 50 and, effectively, what
 21 you're looking at is a record, from about 2000, I think,
 22 roughly speaking, until 2012 or '13, something like
 23 that, where roughly speaking 50 people are prosecuted
 24 every year.

25 So my point is, obviously, that's something that
 25

1 sure I would have adduced that it was him who raised it,
 2 no.

3 **Q.** I mean, you were told in the covering email, "This is
 4 a note from Paula"?

5 **A.** I think so, yeah -- yeah.

6 **Q.** Would it have surprised you if had been revealed that
 7 the note had been drafted by the communications man?

8 **A.** That's an interesting question to which -- I mean, it's
 9 very hard for me to say now how I would have felt
 10 because, when you're new in an organisation, you're
 11 never quite sure, you know, who's got a handle on what.
 12 So I think, had I had a list of all the executives and,
 13 you know, Mark Davies was identified as the comms man,
 14 I might have wondered a bit.

15 **Q.** As it was, you were told this was Paula Vennells' note
 16 in the covering email, as we saw. Can we turn, please,
 17 Mr Parker to the letter you mentioned earlier from
 18 Baroness Neville-Rolfe. POL00102551. This about three
 19 weeks before you joined, 10 September 2015 and I'm going
 20 to read it all:

21 "I am writing to you ahead of your taking up the
 22 role of Post Office Chairman to confirm our conversation
 23 last month regarding the Post Office Horizon system."
 24 I suspect that's a reference back to that mention we
 25 saw in that email exchange.
 27

1 might have raised some question marks. Now, you have to
 2 recognise, as well, that the Post Office, you know, it's
 3 not selling cans of Coke. It's actually an organisation
 4 that deals in cash and so you have to be aware of the
 5 fact that, obviously, when people are dealing with cash,
 6 there are issues with security and there are temptations
 7 to people, and so on and so forth.

8 Notwithstanding that, I think, had that picture been
 9 evident, it might have sort of made people, certainly
 10 would have made me, look at this in a slightly different
 11 context.

12 **Q.** Would other things that may have made you look at this
 13 in a different context include, rather than focusing on
 14 the number of subpostmasters that were presently
 15 alleging faults being only 136, to look back at the
 16 number of subpostmasters over the relevant period that
 17 had alleged faults?

18 **A.** I think that's the point I'm trying to make. It was
 19 quite difficult to frame the scale of the problem.

20 **Q.** Or mention of the operation of a series of helplines
 21 which recorded tens of thousands of complaints of fault?

22 **A.** That wasn't dealt with, clearly, in this context.

23 **Q.** Did you know at the time that this note had been drafted
 24 by the Post Office's communications man, Mark Davies?

25 **A.** If it didn't have Mark Davies' name on it, then I'm not
 26

1 **A.** Mm.

2 **Q.** "The issues surrounding the Horizon IT System have not
 3 been resolved. Indeed, some of the MPs concerned have
 4 written to me again following the Panorama programme
 5 pressing the case for an independent investigation.

6 "The Government takes seriously the concerns raised
 7 by individuals and MPs regarding the Post Office Horizon
 8 system and the suggestions that there may have been
 9 miscarriages of justice as a result of issues with
 10 Horizon. The Government also recognises the commitment
 11 that Post Office have demonstrated to resolving those
 12 issues, including through creating a mediation scheme
 13 and appointing independent investigators to scrutinise
 14 the system.

15 "As you will be aware, there have been some three
 16 years of scrutiny of Horizon and the Criminal Cases
 17 Review Commission is considering a number of cases which
 18 have been brought to it by individuals, and the
 19 Government cannot intervene in that independent process.

20 "As the sole shareholder of Post Office, the
 21 Government wants to make sure that the Post Office
 22 Network is successful and sustainable across the
 23 country. We recognise that the Post Office is
 24 a commercial business and we allow it to operate as
 25 such, but of course, we expect it to behave fairly and
 28

1 responsibly in doing so. I am therefore requesting
2 that, on assuming your role as Chair, you give this
3 matter your earliest attention and, if you determine
4 that any further action is necessary, will take steps to
5 ensure that happens.

6 "I look forward to hearing your conclusions and to
7 working with you to secure the future of the Post Office
8 Network."

9 Then Paula Vennells is copied in.

10 So this letter, if we go back to page 1, draws to
11 your attention that there were unresolved issues
12 regarding Horizon --

13 **A.** It does.

14 **Q.** -- and that those unresolved issues include potential
15 miscarriages of justice?

16 **A.** Indeed.

17 **Q.** This must be a slightly unusual letter to receive when
18 taking up a new job?

19 **A.** It's very unusual. I mean, I'm not a lawyer, obviously,
20 and I think, again, in the spirit of trying to be
21 helpful to the Inquiry, I've had sort of legal issues to
22 deal with but nothing, you know, on this sort of scale
23 that involves activities ultimately that have affected,
24 you know, people, contracts, going to jail and all of
25 that. I mean, yeah, it's just not usual in the

29

1 and perhaps, you know, in a computer system, means
2 different things to different people and I think you
3 probably had quite a few people pass through here. And
4 I think "systemic" became shorthand -- and I was
5 probably, you know, affected by this as much as anybody
6 to say, yeah, the system worked fine, and how do you --
7 what do you mean? It means that there are a few bugs,
8 they're not very frequent, they're discovered, and, you
9 know, so basically you've got something that's okay.
10 That sort of thing.

11 **Q.** So you've got no recollection particularly now, as to
12 where you secured the belief from that Post Office had
13 a general assumption that there were no systemic issues
14 with Horizon and it was robust. Presumably, that would
15 include, however, the briefing note that Mark Davies had
16 drafted?

17 **A.** Yeah, I mean --

18 **Q.** That must have --

19 **A.** I honestly can't -- you know, it's just hard for me to
20 reflect accurately on a generalised picture that I would
21 have had at the time. I have probably gone as far as
22 I'm able.

23 **Q.** You were presented with something of two pictures, then,
24 would you agree: one a general somebody's within the
25 Post Office that there were no systemic issues --

31

1 slightest.

2 **Q.** Your witness statement -- I'm not going to turn it up,
3 I'm just going to read from it -- says at paragraph 28:

4 "When I was appointed as Chair I was aware that
5 concerns had been raised about Horizon, including those
6 relating to Fujitsu. I do not believe that I had
7 detailed knowledge of the specific nature of the
8 complaints at the time and I do not believe I'd formed
9 any views on how to handle the Sparrow issues at the
10 time. However, as I describe below, Jonathan Swift QC
11 and Christopher Knight were being instructed in relation
12 to the Swift Review. My recollection is that there was
13 a general assumption within the Post Office that there
14 were no systemic issues with Horizon, and that it was
15 robust, and this is consistent with the statements made
16 publicly by Post Office at the time"?

17 **A.** Mm.

18 **Q.** So, "My recollection is that there was a general
19 assumption within the Post Office that there were no
20 systemic issues with Horizon"; where did you get that
21 belief from?

22 **A.** I can't tell you. I'm looking back, you know, nine
23 years, trying to sort of assess how I felt at the time
24 and I think, of course, it comes back to this question
25 of: what do you mean by systemic? You know, systemic

30

1 **A.** Mm.

2 **Q.** -- and the system was robust; and the Government saying
3 the issues around the Horizon IT System have not been
4 resolved, we, the Government, take seriously the
5 concerns that are being raised, and those concerns
6 include potential miscarriages of justice?

7 **A.** I think that's a fair description, yes.

8 **Q.** When you joined the company, were there any specific
9 discussions that you can now recall -- this is in
10 October time -- about Horizon issues, whether as part of
11 an induction or otherwise?

12 **A.** I can't.

13 **Q.** Were you provided with the report or reports by Second
14 Sight, either an interim report of July 2013 or two
15 final reports in 2014/15?

16 **A.** I can't.

17 **Q.** Were any concerns raised with you upon joining, or
18 immediately thereafter, about the use by the Post Office
19 of a man called Gareth Jenkins, a Fujitsu employee, as
20 a witness in criminal prosecutions?

21 **A.** No.

22 **Q.** When did you first learn about the issues that there
23 were -- I'm putting it broadly -- with the use of
24 Mr Jenkins as a prosecution witness?

25 **A.** Oh, I mean, some -- I mean, way past this sort of

32

1 timescale. I mean, I'm talking -- yeah, I mean, I can't
 2 tell you exactly when but this -- my sort of awareness
 3 of the definitive situation, I think, where -- of
 4 Jenkins and evidence and all of that, that was sometime
 5 afterwards.

6 **Q.** In the context of the Group Litigation, or even later
 7 than that as part of the criminal appeals to the Court
 8 of Appeal?

9 **A.** I can't tell you, to be honest.

10 **Q.** What did you think upon receiving this letter?

11 **A.** Time to get moving, which I did.

12 **Q.** What did you need to move to do?

13 **A.** To find somebody -- because I was certainly not equipped
 14 personally to do this -- but to find somebody to carry
 15 out what I was asked to do.

16 **Q.** Was it always your intention from the start that another
 17 person would conduct some form of exercise and that
 18 person would not be you?

19 **A.** Yes, I think so. I think so because there were a lot of
 20 issues here that I wasn't really familiar with. So
 21 I'm -- again, I'm not a legal person, I'm not an IT
 22 person and I'm not somebody who has got a lot of
 23 experience dealing with this sort of, if you like,
 24 non-commercial area. So my first instinct, yes, was,
 25 you know, what sort of person could do this job?

33

1 **Q.** "... please see below my starter for ten speaking notes
 2 for your meeting with Tim Parker tomorrow ...
 3 "Draft speaking notes ...
 4 "[Post Office] can't influence or predetermine the
 5 outcome of [Tim Parker's] 'review' BUT
 6 "It's reasonable to assume that the findings will be
 7 challenged unless they deliver what [James Arbuthnot]
 8 wants (quashing of convictions and payments of
 9 compensation -- see [James Arbuthnot's] attributed
 10 comments about the CCRC review of [Josephine] Hamilton's
 11 case)
 12 "However, if the purpose of the review is to instil
 13 confidence in BIS ... with the actions taken, it will be
 14 creditable if it is:
 15 "a. undertaken independently from the existing [Post
 16 Office] team;
 17 "b. logical in its approach; AND
 18 "c. delivered against stated objective/s.
 19 "This will help defend any criticism of the work
 20 undertaken (eg that it's 'just another whitewash'), and
 21 ideally curtail further involvement."
 22 Just stopping there, did you understand that there
 23 were two alternatives to what the review might seek to
 24 achieve; (1) to actually deliver what James Arbuthnot
 25 wanted; or (2) instilling confidence in the Department,

35

1 **Q.** Can we turn, please, to POL00065606 and if we scroll to
 2 the email at the foot of the page, again, an exchange
 3 not involving you, from Rodric Williams; do you remember
 4 him?

5 **A.** I remember the name, yes.

6 **Q.** A solicitor in Corporate Services --

7 **A.** Mm.

8 **Q.** -- or specialising in Corporate Services within Post
 9 Office Legal. To Jane MacLeod, do you remember her?

10 **A.** I certainly remember --

11 **Q.** That's General Counsel?

12 **A.** I certainly remember Jane MacLeod, yes.

13 **Q.** Mark Underwood, do you remember him?

14 **A.** The name rings a bell but not a big one.

15 **Q.** And Patrick Bourke?

16 **A.** I remember Patrick.

17 **Q.** Performing what function, do you remember?

18 **A.** He was in Jane's team. I don't recall specifically what
 19 his role was.

20 **Q.** In any event, this is a fortnight or so -- yes, it's
 21 exactly a fortnight -- after that letter of
 22 10 September, and it concerns speaking notes for a Jane
 23 MacLeod and Tim Parker meeting on the 25th, so the next
 24 day. Can you see that?

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

34

1 principally Baroness Neville-Rolfe?

2 **A.** Mm, I think we're talking about -- I mean, it's just my
 3 take, looking at this, two different things, here.
 4 I mean, if you read (2), it says:
 5 "It's reasonable to assume that the findings will be
 6 challenged unless they deliver what JA wants ..."
 7 So that's an observation about findings, isn't it,
 8 and, you know, finding an assumption that the review
 9 would lead to those findings, whereas (3) is about the
 10 purpose of the review. And it seems to me that it's,
 11 you know, it -- one is in danger of sort of confusing
 12 two things: one is what the review comes to; and the
 13 other is what kind of review. Now, if you hadn't seen
 14 paragraph 2, you might say, well, (3) seems, actually,
 15 it's pretty reasonable.

16 **Q.** Was the review to find out the facts, or was its purpose
 17 to instil confidence in the Department?

18 **A.** So, again, if you read (3), it says:
 19 "However, if the purpose of the review is to instil
 20 in BIS (principally ...) with the actions taken ..."
 21 So that's slightly different from just general
 22 confidence. I would see that as -- you know, I could
 23 read that genuine desire to ensure that whatever actions
 24 were taken, they looked to be on the basis of the
 25 a proper independent review.

36

1 **Q.** What was your purpose in commissioning the review?
 2 **A.** So, I had a letter that asked me to look into these
 3 various issues and my purpose, ultimately, was to find
 4 somebody I felt qualified to do that and to agree with
 5 them terms of reference which received to broadly tackle
 6 the challenge laid down in the letter.
 7 **Q.** If we read on:
 8 "5. Defining the review's scope will be key:
 9 "a. What has [Tim Parker] been asked to do?"
 10 Then over the page:
 11 "If it's unclear, [Tim Parker] should now set out in
 12 writing his understanding of the task (ie rewrite the
 13 exam question).
 14 "b. What will Tim Parker actually do?
 15 "[Tim Parker] should state what he wants to achieve,
 16 ideally by reference to a clear question, eg 'Has Post
 17 Office Limited responded to allegations about the
 18 integrity of Post Office's Horizon system and related
 19 business processes in a manner appropriate for
 20 a business which desires to maintain a reputation for
 21 high standards ..."
 22 Then there's a comment about a paraphrase of 3.4(e)
 23 of the letter of appointment being "clunky":
 24 "[Tim Parker] should be able to demonstrate that he
 25 has addressed his stated aim by reference to a logical

37

1 **Q.** Did you ever think that you would perform any role or
 2 were you always of the view this was going to be
 3 subcontracted out to some other person?
 4 **A.** Yes, I felt that the task at hand, carried out by
 5 somebody independent, because although potentially
 6 I could be independent, what was quite important here
 7 was to have not only somebody who was independent but
 8 might have a few of the skills around the subject matter
 9 that I lacked.
 10 **Q.** When you were engaging in discussions with, for example,
 11 Jane MacLeod and Rodric Williams, did you realise that
 12 they may themselves be implicated in the matter to be
 13 investigated?
 14 **A.** So I think that's a fair enough observation but here are
 15 two things -- and I suppose quite a lot of this Inquiry
 16 is dealing with this kind of issue, which is, if you are
 17 board member, a chair or chief executive, to what extent
 18 are you entitled to assume that your advice is coming
 19 from people who are, first of all, qualified and,
 20 secondly, competent? And my take, perhaps naively,
 21 because, you know, the one thing that I found in most
 22 businesses is that, although people have got different
 23 points of view, they're generally trustworthy, is that
 24 I was being given advice by people who were qualified on
 25 that basis. And so was my -- you know, was I kind of

39

1 method of investigation
 2 "both elements should be matters for Tim Parker in
 3 his sole discretion as Chairman, eg they are NOT for
 4 negotiation with [Post Office, Baroness Neville-Rolfe or
 5 the Department, et cetera]."
 6 We can read (c).
 7 **A.** Yes.
 8 **Q.** "6. Given the volume of material, [Tim Parker] is
 9 likely to need 'independent professional assistance':
 10 "He's entitled to this under [his] letter of
 11 appointment ...
 12 "... this could be:
 13 "a solicitor ...
 14 "a barrister ...
 15 "a management consultant ...
 16 "a former civil servant ..."
 17 Then the pros and cons are set out for each of them.
 18 This plan, it seems, was to have you carrying out
 19 the review but assisted by some professional or
 20 professionals; do you agree?
 21 **A.** I'm not sure I'd draw that conclusion, actually. If we
 22 go -- I mean, I'm not sure even if this piece of paper
 23 makes it very clear how, as it were, the workload would
 24 be divided between whoever was going to do the
 25 assisting, as it were, and myself.

38

1 a little -- did I feel that this advice would somehow be
 2 potentially tainted? I don't think I did feel that at
 3 the time, if I'm honest.
 4 **Q.** Did the thought occur to you or is that a reflection
 5 now, after the event?
 6 **A.** It's a reflection after the event. I think, obviously,
 7 after what has happened, it's likely to throw into doubt
 8 quite a lot of the advice that was given and taken in
 9 good faith. I mean, if you go back -- am I allowed to
 10 do this?
 11 **Q.** Yes, you can do whatever you want.
 12 **A.** Well, if you go back to the beginning of this note,
 13 I just want to give you an illustration of that.
 14 **Q.** Yes, go back to page 1, please --
 15 **A.** So --
 16 **Q.** -- and scroll down.
 17 **A.** To move up -- scroll up a little bit -- a little bit
 18 further. I'm not seeing what I wanted to show -- I'm
 19 sorry, I beg your pardon. Just keep scrolling up.
 20 **Q.** When Mr Parker says scroll up, I think he means scroll
 21 down.
 22 **A.** I'm sorry. Yeah. So it's under the "What has TP been
 23 asked to do?", I think. Number 5, if we move on to
 24 that. Okay. So, you know, I mean, without the benefit
 25 of hindsight and with no knowledge of this, you could

40

1 read (b) as actually, you know, a pretty fair-minded
2 kind of view on what needs to be done. You should, you
3 know, just read it. It should state what he wants to
4 achieve, ideally by reference to a clear question, and
5 so on, and so on, and so on.

6 And another factor, I suppose, in all of this,
7 perhaps, you know, wrongly, was that Jane MacLeod joined
8 the Post Office, I think, in 2015. So, you know, I'm
9 not sure -- I sort of felt she was a kind of, you know,
10 she was a fairly new arrival, and she seemed competent,
11 to me. Yeah.

12 **Q.** Are you saying that that first bullet point, "TP should
13 state what he wants to achieve, eg ..." --

14 **A.** Mm.

15 **Q.** -- and then the exam question is rewritten, you could
16 read that in a benevolent way now to be an appropriate
17 question to ask and to answer, or you could read it as
18 a reframing of the issue, so as not to look at the
19 substance of the issues but, instead, to look at the
20 response of the Post Office to the issues? They're very
21 different things, aren't they?

22 **A.** No, I understand your point and, with hindsight of
23 course, you might say, well, the problem with Swift was
24 that it was really just about the complaints.

25 I understand that. But, at the time, it seemed to me,

41

1 I should say this is 9 October 2015:

2 "I am grateful to Jane [Jane MacLeod's] for the
3 following brief summary ...

4 "Sparrow

5 "The Minister is under pressure to speak to various
6 parties including representatives Second Sight (forensic
7 accountants) and Sir Anthony Hooper (former Chairman of
8 the Working Group). We believe that as part of your
9 investigation you should meet with each of these
10 parties, and we have therefore recommended to the
11 Minister that she should not meet with them until (at
12 least) the conclusion of your enquiry (I have a call
13 with her this morning and will recommend that she should
14 await the conclusion of your enquiry before deciding
15 whether to meet with them).

16 "There are number of reasons why we are reluctant
17 for the Minister to speak to these parties (particularly
18 Second Sight) at this point:

19 "By speaking to these parties, the Minister
20 undermines the rationale for your own independent
21 investigation. Second Sight are active on social media
22 and we believe they would make public the fact of any
23 such meeting. This will only encourage expectation of
24 some form of government intervention. We now have the
25 majority of outstanding (non-criminal) cases scheduled

43

1 you know, a reasonable place to go.

2 **Q.** Is that distinction, the one that was just drawn, that
3 what was required by the Minister's letter was to look
4 at the substance of whether the system had integrity and
5 whether the prosecutions made on the basis of Horizon
6 data were safe, is a very different question to
7 examining the Post Office's response in the past to
8 allegations?

9 **A.** So I think -- I mean, again, with hindsight, you might
10 say, well, the Minister's letter was all about the
11 system and we should have just done an IT check and, you
12 know, a contract check and everything would have been
13 fine, but, actually, the way the Minister's letter read,
14 and the way I interpreted it, and felt we were
15 interpreting it appropriately, was to look into the
16 complaints and the issues raised by the complaints and,
17 essentially, you know, that's where Swift went.

18 **Q.** Can we move forwards a little bit to the same part of
19 the narrative, but post-appointment, to POL00117516.

20 Bottom half of the page, please, an email to you
21 directly from Paula Vennells, sent by her Executive
22 Assistant:

23 "Dear Tim

24 "While you have been away, two matters have arisen
25 affecting Post Office which you should be aware of."

42

1 for mediation. Any expectation of government
2 intervention is likely to cause Applicants to withdraw
3 from the Mediation Scheme. I will send you an update
4 ..."

5 Then the email turns to another topic, like
6 a mobile, which is something, over the page, about
7 an entirely different issue.

8 **A.** Mm.

9 **Q.** So Paula Vennells was seeking to delay the Minister from
10 meeting with Second Sight and Sir Anthony until after
11 your enquiry had concluded; did you have a view as to
12 this?

13 **A.** If I did, I can't recall it now.

14 **Q.** Did you see the two issues as linked, Second Sight and
15 Sir Anthony, seeing Baroness Neville-Rolfe and the
16 conduct of your independent investigation?

17 **A.** Knowing me, probably better than anyone, I suppose
18 I would have at the time said to myself, "Look, this is
19 all part of a sort of, you know, the public sector type
20 how do you handle the Minister with this and that?" And
21 I would have said, "Well, if that's a concern and these
22 people have been here for some time and it's to do with
23 these people meeting the Minister, that's the Chief
24 Executive having a view". And it's probably something
25 that I would have said "I'm not" -- you know, I'm going

44

1 to focus on what I'm doing and this isn't something I am
 2 going to make a particularly, you know, big fuss about.
 3 **Q.** Thank you. That can come down.
 4 Ultimately, the person that you asked to conduct the
 5 review was Jonathan Swift QC, assisted by Christopher
 6 Knight, another barrister. Why was a decision taken to
 7 make this a lawyer-led review rather than something more
 8 technical?
 9 **A.** I suppose the answer to that is partly around the
 10 framing of the review, back to your previous point about
 11 responding to the complaints, and partly, I think,
 12 because the issues were not exclusively technical and so
 13 the -- what was a QC at the time ended up looking at
 14 four strands to the problem, as it were.
 15 **Q.** Were the issues to be considered only legal issues?
 16 **A.** Well, I think it's fair to say that, out of the Swift
 17 Review, came some recommendations that were not
 18 exclusively legal.
 19 **Q.** Looking at it at the beginning, rather than at the end,
 20 did you think, when you were deciding, "We're going to
 21 get a lawyer to undertake this task" -- never mind the
 22 personality, in fact, involved -- that the issues
 23 required to be examined were exclusively or
 24 predominantly legal ones?
 25 **A.** I don't think I could comment on whether I had

45

1 help, organise a good sort of report, yeah.
 2 **Q.** So it was more that they were independent and that the
 3 faculties in order properly to investigate the issues,
 4 rather than answer a series of legal questions?
 5 **A.** I think that's a fair reflection.
 6 **Q.** Can we look, please, at the instructions to counsel.
 7 POL00114270, page 3, please. These are the instructions
 8 to counsel, in fact, initially to advise in consultation
 9 on 8 October. So you'd done this quite swiftly,
 10 ie within a week or so of joining the company?
 11 **A.** I got on with the job pretty fast, yeah.
 12 **Q.** If we just see the authors of the instructions, by going
 13 to page 15, foot of the page. We'll see that they are
 14 co-authored by Jane MacLeod and Rodric Williams and,
 15 again, I take it that you wouldn't have seen any issue
 16 with lawyers who were themselves directly involved in
 17 the underlying events being the ones to instruct
 18 Mr Swift?
 19 **A.** I've answered that question kind of before. I don't
 20 think I'd have a different view.
 21 **Q.** In your witness statement -- I'm just going to read it,
 22 rather than getting it up on the screen -- paragraph 40,
 23 you say:
 24 "It seemed to me that Post Office's General Counsel
 25 understood the complexities of the task when identifying

47

1 a specific view but --
 2 **Q.** Mr Parker, I'm just trying to pick away a little bit at
 3 why a lawyer was chosen.
 4 **A.** Okay.
 5 **Q.** It could be because there were legal issues to be
 6 addressed --
 7 **A.** So I --
 8 **Q.** -- hold on -- or it could be, "I want somebody with
 9 a first class mind who is independent", and it doesn't
 10 matter whether or not the issues to be examined are
 11 legal?
 12 **A.** Yes.
 13 **Q.** Can you help us?
 14 **A.** Yeah, I'll try. I think I had some CVs and, from what
 15 I can recall, Jonathan Swift had a very broad range of
 16 experience and seemed to be a person who was used to
 17 dealing with a number of different settings and
 18 I believe, from memory too, that Christopher Knight had
 19 quite a lot of experience in the sort of -- you know,
 20 I wouldn't say IT world but he had done work in that
 21 sort of area.
 22 So I wouldn't say the QC was in the frame just
 23 because he was a lawyer. I would say it was a mixture
 24 of things. A lawyer is someone who was used to
 25 investigating and somebody who could, I think, with some

46

1 suitable candidates. Jonathan Swift QC was a senior
 2 barrister, he had worked as part of the Treasury Counsel
 3 team prosecuting complex cases."
 4 Did you think he was a criminal barrister?
 5 **A.** I can't recall.
 6 **Q.** Presumably, if it's in your witness statement, that is
 7 your current memory: that he was a member of the
 8 Treasury Counsel team that prosecuted cases?
 9 **A.** I presume so, yes.
 10 **Q.** If we go back, please, to page 3, please. There's
 11 an introduction. We'll see a reference in paragraph 2
 12 to the letter from Baroness Neville-Rolfe asking you to:
 13 "... determine whether 'any further action is
 14 necessary' ... to respond to the concerns about Horizon
 15 raised by individuals and MPs. These concerns include
 16 that [Post Office's] reliance on Horizon has resulted in
 17 miscarriages of justice."
 18 Then scrolling down:
 19 "With the assistance of [Post Office's] General
 20 Counsel, Jane MacLeod, the Chairman considers this to be
 21 a request ..."
 22 This was to form the basis of the review, you'll see
 23 the words "review" in brackets afterwards:
 24 "To review the Post Office's handling of the
 25 claimants made by subpostmasters regarding the alleged

48

1 flaws in its Horizon electronic point of sale and branch
2 accounting systems, and determine whether the processes
3 designed and implemented by Post Office to understand,
4 investigate and resolve these complaints ... were
5 reasonable and appropriate."

6 Looking at that now, can you see a shift from the
7 open question in the letter of 10 September from
8 Baroness Neville-Rolfe to a question that focuses
9 instead on the reasonableness of past processes?

10 **A.** I think, with hindsight, it does look that way. At the
11 time -- and again, I'm sorry to keep reminding you, but
12 there are a lot of things going on at the Post Office,
13 and this response to this request at the time seemed to
14 me to be not unreasonable.

15 **Q.** Did you review the instructions at the time?

16 **A.** In what sense? Did I think -- did I -- I mean
17 I looked --

18 **Q.** Did you look at the document we're now looking at?

19 **A.** Oh, I see. Was I aware what the review was about? Yes.
20 Yeah. And was I aware that these were the terms of
21 reference and this was the question that was going to be
22 addressed? Yes.

23 **Q.** Is it right that you considered the request in the
24 Baroness Neville-Rolfe letter of 10 September to mean
25 what is in inverted commas and italics?

49

1 date. The Chairman therefore requires the assistance of
2 Leading Counsel to provide him with advice on:

3 "1. The scope of the review and how this is framed;

4 "2. The process by which the review should be
5 conducted (including what materials should be reviewed
6 and who should be interviewed); and

7 "3. The nature of his final report to the
8 Minister."

9 Again, looking at that paragraph there, these seem
10 to be instructions to a barrister to ask him to advise
11 you on scope of the review, how the review should be
12 conducted and what the nature of the report finally to
13 the Minister should be?

14 **A.** Mm.

15 **Q.** You're not actually asking him to conduct the review?

16 **A.** Sorry, what's -- I'm being a bit dense here but --

17 **Q.** Yes. You could have a set of instructions which say,
18 "Dear Mr Swift, we would like you to carry out
19 an independent review"?

20 **A.** Mm.

21 **Q.** Or you could have a set of instructions which say, "Can
22 you provide assistance on the scope of a review and how
23 this is framed, the process by which the review is
24 undertaken, and the scope of his [ie your] final
25 report"?

51

1 **A.** So, you know, with hindsight, one is apt to see that
2 there are forces at play here trying to subtly shift the
3 emphasis on things and, at the time, at the beginning of
4 this review, it seemed to me that -- and, again, I'm
5 probably not a person who is greatly experienced in
6 setting up reviews -- that a review with a sort of quite
7 a good general brief was capable of going after quite
8 a lot of different areas.

9 If you look at it, you know, out of that particular
10 group of references, you could see that a good
11 investigator would cover off most of the key points that
12 were at issue, and that was my sort of take. I think,
13 you know, because there's been such a terrible
14 subsequent situation, it's very easy to look back and
15 sort of dissect and say, well, could it have been this
16 or could it have been that? As things looked at the
17 time -- and perhaps I was a little naive about where the
18 advice was coming from but I've mentioned, you know,
19 I've talked about this -- it didn't look a bad set of
20 terms of -- well, not the terms of reference, but it
21 didn't look a bad sort of brief, if you see what I mean.

22 **Q.** Thank you. If we just continue, paragraph 4:

23 "In order to be credible, the Review will need to be
24 carried out independently of the team which has been
25 managing [Post Office's] response to these concerns to

50

1 **A.** I think both. I mean, the way certainly I think we set
2 this up was to say "Look, Mr Swift, we want to conduct
3 a review. We'd like you to conduct it and I will work
4 with you on the terms of reference". And I think --
5 I mean, I'm skipping ahead a little bit but, subsequent
6 to this, we met various people and, as a result of those
7 meetings, the terms of reference were put together.

8 **Q.** Can we move forwards, please, to page 15 and under
9 "Instructions":

10 "Leading Counsel is therefore asked to consider
11 these instructions ... prior to meeting [Post Office's]
12 General Counsel ...

13 "The aim of the meeting is to settle the Review's
14 scope and agree a process for conducting, concluding and
15 reporting on the Review within the desired time frame.
16 A further meeting will then be arranged at which Leading
17 Counsel would present this scope and process to [Post
18 Office's] Chairman for his consideration."

19 By this time, was it always envisaged that Mr Swift,
20 as well as advising on the process issues, would himself
21 conduct the review?

22 **A.** I think -- and, again, I'm looking back nine years
23 ago -- that my starting point on this, as I explained,
24 was that I'm probably not the person to actually conduct
25 the review, therefore, you know, it was going to be this

52

1 individual who would actually conduct the review on my
2 behalf. And that made a low of sense, if you think
3 about it, because I had a lot of other things to do and
4 we could actually get the undivided time and attention
5 of a very well-qualified and senior barrister with his
6 assistant to go and do the work, essentially.

7 **MR BEER:** Thank you.

8 Sir, it's just coming up to 11.15 now. Can we take
9 the first morning break between now and 11.25?

10 **SIR WYN WILLIAMS:** Yes, of course.

11 **MR BEER:** Thank you very much, sir.

12 **THE WITNESS:** Thank you.

13 (11.13 am)

14 (A short break)

15 (11.28 am)

16 **MR BEER:** Good morning, sir. Can you see and hear us?

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

18 **MR BEER:** Thank you very much, sir.

19 Before we move on, Mr Parker, to the review report
20 produced by Mr Swift and Mr Knight itself, can I deal
21 with an event that happened or may have happened in
22 between the commissioning of the review and the
23 production of the report in February 2016?

24 You've explained to us already your desire, in
25 particular in the light of Baroness Neville-Rolfe's

53

1 **Q.** He says:

2 "On 15 September 2015, Ian [Ian Henderson] and
3 I went to Mr Parker's office there we met with him and
4 Jonathan Swift."

5 Do you remember Mr Swift being there?

6 **A.** Not precisely.

7 **Q.** "The meeting went on far longer than the pre-booked one
8 hour, Mr Parker having insisted that we stayed longer to
9 answer more questions."

10 Does that trigger any memory?

11 **A.** No, but I think it's probably reflective of the fact
12 that, you know, I wanted to listen to these guys. Yeah.

13 **Q.** We have got some emails of 15 December, circulating
14 within Post Office, saying, "They're still in there,
15 they're still in the meeting, it's going on longer than
16 anticipated", and you were going to miss your next
17 meeting?

18 **A.** Okay.

19 **Q.** He, Mr Warmington, says:

20 "We held nothing back at that meeting. Indeed,
21 [Mr Henderson] later characterised it with the words 'We
22 gave him both barrels'. In practical terms that meant
23 that we went through with Mr Parker and Mr Swift all of
24 the thematic issues that we had covered in our final
25 report back in April 2015."

55

1 letter of 10 September 2015 to find out information
2 about Horizon from a wide range of sources.

3 **A.** Mm, mm.

4 **Q.** Do you recall meeting Ron Warmington and Ian Henderson
5 of Second Sight in your office in December 2015?

6 **A.** I know I met them. I don't recall the substance of that
7 meeting, if I'm honest.

8 **Q.** Can I just read you what Mr Warmington has said about
9 it. This is paragraph 85 of his statement, he said:

10 "In early December 2015 I received a telephone call
11 from the office of the then relatively new Chairman of
12 the Post Office, Tim Parker. He invited me to come to
13 his office to help get him up to speed on the Horizon
14 matter."

15 Does that sound likely to be correct?

16 **A.** Likely.

17 **Q.** Thank you:

18 "I later learnt that Baroness Neville-Rolfe had,
19 following a meeting that Ian Henderson and I had had
20 with her, suggested to Mr Parker that he should meet
21 with us."

22 Again, can you help us whether that is likely to be
23 correct, ie the idea of the meet came from Baroness
24 Neville-Rolfe?

25 **A.** Possibly.

54

1 Does that trigger a memory in you that they were
2 particularly forceful in what they said to you, ie "We
3 gave him both barrels"?

4 **A.** I'm sorry not to be of more help but this is nine years
5 ago: the answer is no.

6 **Q.** He continues:

7 "We made it perfectly clear that the rebuttal report
8 that Post Office had immediately issued alongside our
9 final report was utter nonsense and that were he to be
10 deceived into placing reliance on it or, worse still,
11 endorsing it, the consequences would likely be very
12 dire."

13 Do you remember a meeting of that type, ie you had
14 two gentlemen who had been independent investigators
15 coming in and saying words to the effect of "The Post
16 Office rebuttal report" -- ie the rebuttal to their
17 final report -- "ought not to be relied on"?

18 **A.** I don't. I think, again, my recollection of this
19 meeting is just not -- I just don't have a recollection
20 of it precisely.

21 **Q.** Do you recollect a meeting in which it was said that if
22 he -- ie you -- was to place reliance on what the Post
23 Office was saying in its rebuttal report, the likely
24 consequences would be very dire or dire?

25 **A.** I think all I can tell you -- because, you know, the

56

1 question has been asked three times, more or less -- is
2 that I think Jonathan Swift and I would have listened to
3 what we were told and he would have taken away a lot of
4 the remarks that were made by Ron and Ian.

5 **Q.** I don't think you're in a position to say that what
6 Mr Warmington has said is incorrect. If he had said
7 those things, what would be the consequences for you?

8 **A.** I think my mindset at the time was we're in the early
9 days of putting together this review, I've heard what
10 these guys have got to say and we'll take the thing
11 forward. It's not my, you know -- I don't think I would
12 have jumped to the conclusion that everything they say
13 is indubitably correct; I think I would have said "Well,
14 let's do some more work", which is what actually
15 happened.

16 **Q.** In order to summarise, you would have seen this as a matter
17 for Mr Swift to bring into account, rather than for you
18 to take any particular action?

19 **A.** I think that's slightly false contrast. I think, at
20 that stage, bearing in mind that I was going to review
21 the eventual output of Mr Swift, he certainly would take
22 away the comments of Second Sight, yes.

23 **Q.** What would you therefore -- if my suggestion involved
24 a slight false contrast -- going to do with what you had
25 been told?

57

1 when it came to be put together, certainly did not take,
2 if you like, the house view as the only version of
3 events. I think quite a lot of the comments of Second
4 Sight were incorporated into the review itself.

5 **Q.** Let's look at the review itself. POL00006355. I'm not
6 going to go through every paragraph of it, not least of
7 which because it's 66 pages long and that wouldn't be
8 productive. If we could look just a little further
9 down, we'll see the date of 8 February 2016.

10 If we go forwards to page 2, and just pan out
11 a little bit, we will see the structure, the overall
12 structure, of the report, after some introductions and
13 passages about the scope of the report. It's divided
14 into chapters concerning: Post Office, subpostmasters
15 and the Horizon system; the complaints themselves; the
16 criminal prosecutions; the Horizon system; support
17 provided to subpostmasters; investigations, ie the past
18 scheme investigations; and a summary of recommendations.

19 If we go forward to page 3, please, and if we just
20 look at the end of paragraph 2, four lines up:

21 "These matters have been the subject of
22 consideration and investigation by and on behalf of
23 [Post Office] on a number of occasions. The purpose of
24 this review is to consider whether any further action
25 could now reasonably be taken by [Post Office] to

59

1 **A.** I think my mindset, at that point, was to allow Mr Swift
2 to do the work and produce the report. I don't think
3 I took out of that meeting -- because actually, as far
4 as I'm aware, I didn't do anything immediately --
5 I don't think I took out of this meeting, "I've heard
6 from these people, I'm about to go out and do
7 something"; let's do the report and let's see where it
8 goes.

9 **Q.** In the meeting was held in the context of somebody
10 undertaking a review and the person undertaking the
11 review ought to pay regard to what was said, rather than
12 you do anything independently?

13 **A.** I mean, honestly, I think this is a bit of a hindsight
14 characterisation of a meeting at the time, where I was
15 quite early still in the business and would have just
16 been doing a lot of listening. So I'm not sure, out of
17 it, you know, I -- yeah, I just moved on with the
18 review, yeah.

19 **Q.** I mean, it can't be every day that you have independent
20 investigators or consultants, management consultants or
21 forensic accountants come in, and if they're correct in
22 what they say, tell you, as a chairman, that you
23 shouldn't be relying on the public facing document that
24 your executives have put out?

25 **A.** No, and I think it's fair to say that the Swift Review,

58

1 address the matters raised by the [subpostmasters]."

2 Paragraph 3, five lines up from the bottom:

3 "The Legal Department of [Post Office] has been the
4 source of most of the information provided to us, but we
5 have determined what information should be provided."

6 When the review was being undertaken, did you have
7 a running commentary essentially on it, or did you set
8 the terms of reference as we've seen and then wait for
9 the review to report?

10 **A.** I think it -- I mean, again, without wanting to deliver
11 a definitive view, I think there was a sort of ongoing
12 discussion. I don't think it was a sort of, you know,
13 "Here's the terms of review, give me a ring in five
14 months' time", or whatever. You know, I think there was
15 some kind of ongoing discussion.

16 **Q.** You certainly received a draft report in --

17 **A.** I did, yeah --

18 **Q.** -- January?

19 **A.** -- in January, yeah.

20 **Q.** Did you know that the Legal Department was the source of
21 most of the information provided to Messrs Swift and
22 Knight?

23 **A.** I think I probably did. Yeah.

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

25 "The purpose of this review was originally described

60

1 in the following terms", and then we see the quote from
2 the briefing paper we read earlier:

3 "We have been guided by this. But we have
4 concentrated on whether any further action is reasonable
5 and necessary in respect of these issues. This has
6 highlighted two principal questions:

7 "What has been done in the 2010-2015 period?

8 "If there are any gaps in the work done, is there
9 further action that can reasonably now be taken?"

10 Over the page, please, and look at paragraph 10.

11 Having set out, in summary, the documentation that the
12 authors have reviewed, they set out in paragraph 10
13 those with whom they met: Lord Arbuthnot; Second Sight;
14 Deloitte; Fujitsu; Angela van den Bogerd; Mr Seller,
15 Ms Dickinson; and Ms Hailstones and Ms Alexander.

16 Then, if we go forwards, please, it's getting more
17 to the substance, to page 34. You can see on pages 34
18 and 35 the author's view on one of the issues, namely
19 the sufficiency of evidence to bring charges of theft.

20 A. Mm, mm.

21 Q. I'm just going to read these passages. The allegation:

22 "As we understand it ... is that [Post Office] has
23 too readily brought a charge of theft, which is said to
24 be more serious than false accounting, with the aim or
25 effect that the [subpostmaster] is pressurised into

61

1 Over the page:

2 "We note Brian Altman's advice of 8 March that it is
3 not a helpful question to ask whether a theft and false
4 accounting are offences of equal seriousness, both being
5 dishonesty offences with a maximum sentence of seven
6 years' imprisonment, because the seriousness is
7 dependent on the nature of the specific allegation
8 rather than the charge *per se*.

9 "We entirely accept that the decision to plead
10 guilty is a matter for the defendant alone. Any
11 concerns they have about the legal advice they received
12 at the time is a matter only the defendant can pursue
13 and is not the responsibility of [Post Office] ... it is
14 always open to the defendant to challenge the
15 sufficiency of the evidence disclosed to him or her and
16 seek to have that charge dismissed.

17 "[Post Office's] position is that its prosecutorial
18 decisions are always taken in accordance with the
19 [Code], which requires that there be sufficient evidence
20 to provide a realistic prospect of conviction, and ...
21 must be in the public interest. [Post Office] that is
22 referred us to the Cartwright King disclosure review
23 exercise, noting that Cartwright King also expressed
24 views in their advice as to whether [Post Office] should
25 oppose any appeal brought, suggesting that they must

63

1 pleading guilty to false accounting in the hope that the
2 theft charge is dropped, and because a theft charge
3 would more readily enable [Post Office] to recover its
4 losses. We understand there are approximately 18 scheme
5 cases in which this, or something similar, occurred. We
6 have also read the full trial transcript [of] Seema
7 Misra in which a jury convict the defendant of theft
8 (following a guilty plea to the charge of false
9 accounting).

10 "Whether [Post Office] had sufficient evidence to
11 bring a charge of theft alongside charges of false
12 accounting is an accusation raised by number of scheme
13 applicants, as well as by Lord Arbuthnot ... it has also
14 been a matter raised by Second Sight ...

15 "102. We are aware that the suggestion has gained
16 particular traction in scheme case M035 ... In this case
17 certain documents in the prosecution file indicated that
18 the initial [Post Office] Investigators could not find
19 evidence of theft ..."

20 This the case of Josephine Hamilton, I should say.

21 A. Mm, mm.

22 Q. "... (although there was clear evidence of false
23 accounting), but theft was nonetheless charged. We have
24 seen those documents and have noted the absence of clear
25 documented rationale for charging theft."

62

1 therefore have considered the evidence involved. [Post
2 Office] has also explained to us that because of these
3 points, and because any review would be carried out with
4 the benefit of hindsight, it will not be an appropriate
5 course of action to review now the prosecution files to
6 reconsider the sufficiency of evidence issue.

7 "106. We do not agree. We have reached the view
8 that this issue is one of real importance to the
9 reputation of [Post Office], and is something which can
10 feasibly and reasonably be addressed now. It is clear
11 that it is not an exercise which has been carried out so
12 far, and Cartwright King were not asked to consider the
13 sufficiency of the evidence when undertaking their
14 disclosure review."

15 Skipping a sentence:

16 "The allegation that [Post Office] has effectively
17 bullied [subpostmasters] into pleading guilty to
18 offences by unjustifiably overloading the charge sheet
19 is a stain on the character of the business. Moreover,
20 it is not impossible that [a subpostmaster] would have
21 felt pressurised into pleading guilty to false
22 accounting believing it to be less serious when they
23 might not otherwise have done so; the phenomenon of
24 false confessions is well known."

25 I'm going to stop reading there.

64

1 That's quite strong language, isn't it?
 2 **A.** Quite strong, yeah.
 3 **Q.** Is this is an example of what you mentioned, I think, in
 4 passing earlier, that the review did not universally
 5 take on board the Post Office's position?

6 **A.** I think that's right and I think, in a way, because, as
 7 we know the aftermath wasn't necessarily satisfactory,
 8 but at the time, it was a good -- for me, a confirmation
 9 that to have a qualified barrister look at these things
 10 produced a pretty good analysis of the issue, and its
 11 impact, and as -- if we go further, obviously,
 12 recommendations about what to do about it.

13 **Q.** You said there that the aftermath wasn't necessarily
 14 satisfactory, we know. Can you tell us what you are
 15 alluding to there?

16 **A.** Alluding to? Well, I don't want to sort of prejudge,
 17 you know, the discussion but, you know, Swift, in my
 18 view, was quite a good report and contained quite a lot
 19 of good material and, as the litigation unfolded, as we
 20 will discover a few months down the line, effectively
 21 Swift was stopped and repurposed.

22 So this component of Swift, actually -- you know,
 23 again the result with hindsight might not have been
 24 satisfactory, because its scope of investigation was
 25 limited but, you know, Altman did his review and

65

1 those circumstances, that counsel review the prosecution
 2 file in such cases to establish whether, applying the
 3 facts and law applicable at the relevant time, there was
 4 a sufficient evidential basis to conclude that
 5 a conviction for theft was a realistic prospect such
 6 that the charge was properly brought."

7 I think you'd agree, they are sensible
 8 recommendations, arising directly from the passages that
 9 we've just read?

10 **A.** Yeah, yeah.

11 **Q.** Can we turn then to page 43 at the foot of the page:

12 "125. ... the Horizon system does occasionally
 13 suffer from bugs which have caused losses in some
 14 branches. Those bugs have been generic in the sense
 15 that they have the potential to affect any branch,
 16 depending on how it is structured. It is often the case
 17 that those bugs are identified when [a subpostmaster]
 18 draws the attention of [Post Office] and Fujitsu to
 19 an odd situation which she cannot explain and which
 20 appears to have had caused a discrepancy. We were told
 21 by [Post Office] that when carrying out their
 22 investigations into scheme cases, investigators were
 23 looking out for unusual or unexplained patterns of
 24 transactions which might have required further technical
 25 examination by Fujitsu to confirm whether there was

67

1 produced his report. So, you know, from the perspective
 2 of "Here's the problem" -- which is, you know, charging
 3 theft potentially with the pressure to get people to own
 4 up to false accounting -- I think Swift more or less got
 5 that but it didn't -- you know, again, it translated
 6 into the Altman work.

7 So this component, I think, again, moved the thing
 8 forward as you would want it to be moved forward.

9 **Q.** Can we turn to the recommendations of Mr Swift's report
 10 and I'm not going to, in the way I've just done there,
 11 track the foundation for the recommendation into the
 12 recommendation on every occasion. That was just one
 13 example.

14 **A.** Yeah, yeah.

15 **Q.** Page 38, then, please. The recommendations arising from
 16 that section of the report are:

17 "(1) [in bold] Legal advice be sought from counsel
 18 as to whether the decision to charge [a subpostmaster]
 19 with theft and false accounting could undermine the
 20 safety of any conviction for false accounting where (a)
 21 the conviction was on the basis of a guilty plea,
 22 following which and/or in return for which the theft
 23 charge was dropped, and (b) there had not been
 24 a sufficient evidential basis to bring the theft charge.

25 "(2) If such a conviction could be undermined in

66

1 a wider bug. [Post Office] told us that no instance
 2 arose and Fujitsu were not asked to look at the records
 3 in any case. Fujitsu confirmed to us that they did not
 4 carry out any analysis of scheme records.

5 "We consider that there is the possibility that
 6 an alternative approach to the transaction analysis
 7 would have provided greater certainty that there was no
 8 bug which had affected some of the scheme branches. We
 9 take this view because [Post Office's] approach was
 10 necessarily 'bottom up', in the sense that it started
 11 from and focused on the specific circumstances of the
 12 branch, looking at the transaction logs where necessary
 13 to review a particular complaint, be it general or
 14 specific."

15 Skipping over:

16 "A different, but complementary, approach would have
 17 been a 'top down' analysis of the transaction logs of
 18 the scheme branches undertaken by Fujitsu or
 19 an independent qualified party to search for patterns of
 20 unusual behaviour in individual branches, and across
 21 branches, on a purely data-driven analytical basis which
 22 might suggest a wider problem, which could then be
 23 cross-referenced with the branch fact-specific work
 24 carry out by [Post Office] ...

25 "In our meeting with Deloitte, it was confirmed that

68

1 this type of exercise was something they would have
2 expected could be carried out across the relevant
3 dataset (including non-Scheme branches as a control) to
4 look for oddities or reconciliation errors. We are
5 mindful that external organisations are more likely to
6 suggest possible sources of work they could carry out,
7 but the suggestion aligns with our own view ... which is
8 at least potentially useful to rule out more
9 comprehensively the possibility of a system bug,
10 affecting some scheme cases."

11 Again, a series of observations or a views that you
12 would consider reasonable?

13 **A.** I think I probably did at the time, yeah.

14 **Q.** If we go forward to 53 -- I should have stopped off on
15 the way at 51, at paragraph 145, just in passing:

16 "It seems to us that the Deloitte documents in
17 particular pose real issues for [Post Office]. *First*,
18 both the existence of the balancing transaction
19 capability and the wider ability of Fujitsu to 'fake'
20 digital signatures are contrary to the ... assurances
21 provided by Fujitsu and [Post Office] about the
22 functionality of the Horizon system. Fujitsu's comment
23 we quote above seems ... to be simply incorrect, and
24 [Post Office's] Westminster Hall Response is incomplete.
25 To the extent that [Post Office] has sought to contend

69

1 let's see and let's try and understand this theoretical
2 ability, how practical is it, in fact, to remotely
3 access accounts? And that was, you know, what I took
4 away from this, I suppose.

5 **Q.** Did you take away from the fact that Fujitsu and Post
6 Office's public facing comments had been incorrect and
7 incomplete?

8 **A.** Yes, I mean, that's something -- I've looked back at
9 this and I suppose my reaction at the time was
10 essentially to Swift -- and we'll get on to the legal
11 privilege thing in a minute -- was, you know: this is
12 a report, let's -- there are some recommendations, let's
13 actually get to the recommendations and then my hope and
14 intention was to, you know, have the outputs of the
15 report discussed.

16 Now, we didn't get there, much to my regret, and
17 I think I was probably a little optimistic about how
18 quickly we could get on top of some of these issues and
19 then properly correct the issue, I suppose. But, you
20 know, it was something I was aware of and, with
21 hindsight, perhaps we should have jumped up immediately
22 and said, "Look, you know, there is a theoretical
23 possibility of remote access". And I was assuming, as
24 it turned out probably quite wrongly, that we could do
25 the work on Swift and then say, yes, there is remote

71

1 that branch data cannot be remotely 'amended' because
2 a balancing transaction does not amend existing
3 transactions but adds a new one, we do not consider this
4 is a full picture of Horizon's functionality. The
5 reality is that a balancing transaction is a remotely
6 introduced addition to branch records, added without the
7 need for acceptance by the [subpostmaster], which
8 affects the branch's balance; that is its express
9 purpose. [Post Office] has always known about the
10 balancing transaction capability, although the Deloitte
11 report suggests the digital signature issue is something
12 contrary to [Post Office's] understanding."

13 Just stopping there as I went past, when you
14 received the report, did you know about the remote
15 access issue?

16 **A.** No, I don't think so. I can't be sure but I don't think
17 I did.

18 **Q.** Did you know that there was a concern that either the
19 Post Office and/or Fujitsu had a facility remotely to
20 access branches?

21 **A.** I don't think I did. You know, the remote access issue,
22 of course, has been quite a big element of this whole
23 set of problems, and I think my take on it was, in
24 theory, there is a remote access problem and -- you
25 know, we'll get to the recommendations in a moment --

70

1 access and it is theoretically possible, but
2 practically, it either is likely, less likely, or very
3 unlikely. That was, I think, where I got to with it.

4 **Q.** Where did you get information from that remote access
5 was only theoretically possible?

6 **A.** I think that's what was said here, essentially. That
7 was what I took away from it, anyway.

8 **Q.** In any event, let's turn to the recommendations on this
9 part of the report by looking at page 53:

10 "We recommend ...

11 "(3) [Post Office] consider instructing a suitably
12 qualified party to carry out an analysis of the relevant
13 transaction logs for branches within the scheme to
14 confirm, insofar as possible, whether any bugs in the
15 system are revealed by the dataset which caused
16 discrepancies in the accounting position of any of those
17 branches.

18 "(4) [Post Office] instruct a suitably qualified
19 party to carry out a full review of the use of balancing
20 transactions throughout the lifetime of the Horizon
21 system, insofar as possible, independently to confirm
22 from Horizon system records the number and circumstances
23 of their use.

24 "(5) [Post Office] instruct a suitably qualified
25 expert to carry out a full review of the controls over

72

1 and use of the capability of authorised Fujitsu
2 personnel to create, amend or delete baskets within the
3 sealed audit score throughout the lifetime of the
4 Horizon system, insofar as is possible."

5 Those two recommendations, you'll see, are speaking
6 about the lifetime of the Horizon system. Did you
7 understand them at the time to mean literally since
8 Legacy Horizon had started --

9 **A.** Yeah.

10 **Q.** -- ie about 2000?

11 **A.** I can't tell you. Of course, with hindsight, the
12 lifetime thing actually gets to be quite critical
13 because it turns out that most of the real issues that
14 people experienced were with Legacy Horizon, but I'm not
15 sure that really, you know, that really came through to
16 me as a big thing at the time. Yeah.

17 **Q.** "[Post Office] seek specialist legal advice from
18 external counsel as to whether the Deloitte reports, or
19 the information within them concerning balancing
20 transactions and Fujitsu's ability to delete and amend
21 data in the audit store, should be disclosed to
22 defendants of criminal prosecutions brought by [Post
23 Office]. This advice should also address whether
24 disclosure should be made, if it has not been [made], to
25 the CCRC."

73

1 "[Post Office] commission forensic accountants to
2 review the unmatched balances on [Post Office's] general
3 suspense account to explain the relationship (or lack
4 thereof) with branch discrepancies and the extent to
5 which those balances can be attributed to and repaid to
6 specific branches."

7 Again, does that fall within the same category that
8 we just discussed, reasonable and grounded in --

9 **A.** Reasonable and grounded, I agree.

10 **Q.** There's one that I've missed out, (7) I think. If we go
11 forward to page 66, number 7:

12 "[Post Office] should cross-reference specific
13 complaints about misleading advice from NBSC call
14 handlers with the possible employees who provided that
15 advice and consider their personnel files, where
16 availability, for evidence as to the likelihood that the
17 complaint may be well founded."

18 So if we just go back to 65 and pan out. The
19 recommendations 1 to 5 are collected together in
20 a summary and then, over the page, we see (6), (7) and
21 (8) collected together.

22 Overall, would you agree that there was a wide range
23 of work that required to be done arising from the Swift
24 Review?

25 **A.** Yes, I think we were talking earlier about, you know,

75

1 Again, upon reading this, you wouldn't have had any
2 reason to reject the recommendations?

3 **A.** No.

4 **Q.** They seem reasonable and sensible --

5 **A.** They seemed reasonable and sensible, yes.

6 **Q.** -- and they're grounded in the body of the text --

7 **A.** Yeah.

8 **Q.** -- that preceded them?

9 **A.** Absolutely, yeah.

10 **Q.** If we go forwards, please, to 64, and paragraph 173:

11 "There is one issue which potentially relates to the
12 scheme cases but which has not, so far as we are aware,
13 been the subject of any specific analysis. That issue
14 was the one raised by Second Sight in their Part Two
15 Report ... and relates to the handling by [Post Office]
16 of unmatched credit balances in its own suspense account
17 (or similarly named account) in respect of third party
18 clients (such as Santander or Bank of Ireland). The
19 point Second Sight raise is that where there are
20 significant sums in unmatched balances, it is possible
21 that at least some of that money would reflect
22 uncorrected transaction discrepancies in particular
23 branches. We consider that this illogically possible,
24 and is at least worthy of express investigation and
25 clarification. Accordingly, we recommend that:

74

1 the terms of reference and whether it was correctly
2 structured and -- but, actually, I feel with hindsight,
3 again, that Swift was not a perfect piece of work but it
4 wasn't a bad piece of work, and it yielded some good
5 recommendations.

6 **Q.** Would you agree that the review raised significant
7 reputational issues for the Post Office in the light of
8 what it uncovered and the recommendations that it made?

9 **A.** I think there were some issues that definitely needed
10 addressing pretty -- yeah, pretty urgently.

11 **Q.** What about my question, Mr Parker?

12 **A.** Yeah, no, I think that's a fair -- these are all matters
13 with some reputational impact, potentially.

14 **Q.** Significant reputational issues for Post Office, was how
15 I formulated it, if this was publicly disclosed?

16 **A.** Yeah, I'm not going to argue about the language. These
17 are important matters, yeah.

18 **Q.** Sometimes it's important, though, the language.

19 **A.** Yes, no, I think you're absolutely right. Let's say
20 reputational issues, yeah, matters.

21 **Q.** You had a decision to make as to with whom the report
22 should be shared, correct?

23 **A.** Yes.

24 **Q.** When the report landed on your desk -- in your inbox,
25 more likely -- did you have a view as to with whom it

76

1 should be shared, if anyone?

2 **A.** I -- that's a very interesting question. So to go back
3 into the history of this thing, it was always envisaged
4 that the Swift Review would be legally privileged and
5 I think that was explained -- I haven't got the papers
6 to hand but, somehow, it was envisaged that it would be
7 a report from a QC -- at the time -- and it would be
8 legally privileged.

9 **Q.** Just stopping there, the report on its face is not
10 marked as privileged, is it?

11 **A.** No, no.

12 **Q.** The report does not say that it's been provided for the
13 purpose of any ongoing litigation?

14 **A.** It doesn't, but my --

15 **Q.** It doesn't say that it was provided for the purposes of
16 obtaining legal advice, does it?

17 **A.** No, but whatever was actually on the report, and, you
18 know, I'm not looking at whether it's got --
19 I understood, and was advised by General Counsel, that
20 it should be legally privileged and I believe that was
21 understood also by civil servants at the time as well.
22 I may be wrong but, generally, it was understood that
23 this would be a piece of legally privileged work with
24 a view, once the recommendations had been carried
25 forward, to being shared more widely. That was my

77

1 recollection is different from Mr Parker's. Although
2 I agree that I discussed privilege and confidentiality
3 when I met him, my recollection is that the Senior
4 Independent Director, Mr McCall, asked a question at
5 a board meeting as to whether the Board would be briefed
6 on the findings of the Chairman's review. I believe
7 that, as a result of that question, I provided an oral
8 briefing to the Board as to the scope and findings of
9 the chairman's review, as well as summary of the further
10 work being undertaken following the Chairman's review.
11 Although I've not seen any documents which indicate that
12 the full report was circulated to the Board, my
13 recollection is that I advised the Board that the full
14 report was available on request."

15 **A.** Indeed, that's what she put into her witness statement
16 and I can only say that there's -- I know which
17 particular document it's in but she advised that the
18 report should be four copies, I think, none saved to
19 a hard disk, or whatever, and it was clear. I'm sure
20 she told me, and my recollection I don't think is wrong,
21 that this was going to be a legally privileged report
22 and that's why it was restricted to four copies only
23 that were held within the Legal Department.

24 Her comment -- I mean, the other point to make,
25 I suppose, is because this is of interest, is that, you

79

1 understanding of it.

2 **Q.** You said that there was an assumption. Who held that
3 assumption?

4 **A.** When you say --

5 **Q.** An assumption that the report would be legally
6 privileged, was one of the things that you said. Who
7 held that assumption?

8 **A.** That's quite an interesting question and I'm not sure
9 I've got a ready answer to it. All I can tell you is
10 that my recollection, and certainly what I understood,
11 was that the report would be legally privileged. That
12 was the advice that I received at the time.

13 **Q.** Was that advice orally or in writing?

14 **A.** I can't confirm whether it was oral or in writing but
15 I certainly understood that to be the case.

16 **Q.** Who gave you the advice?

17 **A.** The General Counsel.

18 **Q.** Jane MacLeod?

19 **A.** Yes.

20 **Q.** Jane MacLeod, in her witness statement -- no need to
21 turn it up, it's WITN10010100 at page 100, paragraph
22 184 -- says:

23 "I am aware from open source material that Tim
24 Parker has said that I had advised him not to brief the
25 Board on grounds of confidentiality and privilege. My

78

1 know, there was no intention to hide the report as such.
2 People knew about the report but it was a legally
3 privileged document. And, again, you know, it's one of
4 my regrets is that I got that advice and I took it, and
5 that's essentially how the report was conceived.

6 **Q.** So it was advice from the General Counsel, Jane MacLeod,
7 directly to you, the --

8 **A.** Yes, and that sort of privileged --

9 **Q.** Sorry, if I could just finish the sentence.

10 **A.** Yes, I beg your pardon.

11 **Q.** That the report, the Swift Report, was a legally
12 privileged document?

13 **A.** That was certainly my understanding at the time and
14 I believe, in communications with UKGI, it was also made
15 clear --

16 **Q.** We're going to come to that in a minute.

17 **A.** Yeah.

18 **Q.** For you, what were the consequences of being advised
19 that the report enjoyed legal privilege?

20 **A.** So --

21 **Q.** What did that mean for you?

22 **A.** Yeah, so look, here I am. I've had this report
23 commissioned, right. I've got no history of -- you
24 know, I wanted to get some kind of result from it. But
25 then I get this advice and, as I understood it at the

80

1 time, the report would be legally privileged, the GC and
 2 her team, with others, would take forward the
 3 recommendations, and when the recommendations were
 4 completed, the outputs would then be shared. That was
 5 my sort of view and that's what I expected to happen.

6 **Q.** The fact that you were advised that the report was
 7 legally privileged, what did you understand as to who
 8 that prevented you from sharing the report with?

9 **A.** Yeah, I think, again, this is one of the slightly
 10 unsatisfactory elements of the whole thing, is that
 11 I felt, erroneously, probably, it turns out, that
 12 legally privileged or legal privileged meant that the
 13 report, effectively, was circumscribed to only the
 14 people who were involved in the legal process.

15 **Q.** Was that something that you were advised by Ms MacLeod
 16 or was that something which you assumed on the basis of
 17 being told the report is privileged?

18 **A.** I can't tell you for sure but I think the fact that
 19 I was told that the report should only be confined to
 20 four copies, I certainly took away from that that legal
 21 privilege implied that it was a report that would be
 22 held in a very tight knit -- tightly knit group of
 23 people, and these were of the four people and they were
 24 all people who worked in the GC's department.

25 **Q.** In practice, did that understanding -- I'll call it --

81

1 if that was the issue, perhaps could have been shared.
 2 And it's just one of those things that, at the time,
 3 I was advised and I took the advice. It's one of the
 4 unfortunate aspects to all of this, is the extent to
 5 which perhaps advice taken from specialists turned out
 6 to be something that might have been tested or reviewed
 7 in a different way.

8 **Q.** I'll ask you the direct question: did Ms MacLeod tell
 9 you that the fact that the report enjoyed privilege
 10 prevented you from disclosing it to the Board?

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

12 **Q.** Did she advise you directly?

13 **A.** I can't confirm one way or another. All I can do is
 14 look back and say, look, what possible motive would
 15 I have had at the time from hiding this report from my
 16 fellow Board members, other than receiving advice that
 17 I shouldn't share it with my fellow Board members? Bear
 18 in mind, I had no axe to grind on this. I had no
 19 vested -- any vested interest in trying to protect the
 20 Post Office or whatever it had done. It was simply the
 21 advice I received and I followed it.

22 **Q.** As part of the quote from Ms MacLeod's statement that
 23 I read you, she said:

24 "My recollection is I advised the Board that the
 25 full report was available on request."

83

1 that you reached, prevent effective discussion from
 2 taking place at the Board of the Post Office if members
 3 of the Board could not see the report?

4 **A.** So I think, whilst being aware of the report, I felt it
 5 certainly did, yeah. I mean, my view at the time was
 6 that -- and perhaps this was somewhat naive -- that the
 7 recommendations would come out pretty quickly and we
 8 would be able to talk about, you know, the report as
 9 completed. But that didn't happen unfortunately.

10 **Q.** Did you understand, from what Jane MacLeod advised you,
 11 that you were prevented from sharing the report with
 12 other Board members?

13 **A.** I think that was my understanding, yes.

14 **Q.** What did you understand, if you did understand it, to be
 15 the difficulty in sharing a report with other Board
 16 members who themselves would owe a duty of
 17 confidentiality and confidence to the company?

18 **A.** I thought -- and again, perhaps it betokens a certain
 19 lack of experience in this area -- that legal privilege
 20 meant a restriction on the circulation of the report,
 21 and with, you know, what I've read subsequently, was the
 22 report meant for me personally and was it going to be
 23 legally privileged for me personally? Could we have
 24 shared it? I wish we had, in a way.

25 And I think, you know, a suitably redacted version,

82

1 Were you present at any Board meeting at which they
 2 were told, "If you want the report, you only have to
 3 ask"?

4 **A.** Well, I presume that, if that's what Jane MacLeod has
 5 said, and she attended Board meetings, and I can only
 6 think of one Board meeting that I missed in the whole of
 7 my time at the Post Office, I probably would have been
 8 there, yes.

9 **Q.** Can you recall that being said? It's not reflected in
 10 any of the minutes?

11 **A.** I can't.

12 **Q.** What was your understanding as to the fact that the
 13 report was said to enjoy legal privilege, insofar as
 14 distribution of a copy of the report or sharing the
 15 contents of the report with the Minister or Government
 16 was?

17 **A.** I think that was a similar concern and I should say that
 18 the legal privilege thing -- I'm now beginning to
 19 recollect it a little bit more -- was around the Freedom
 20 of Information mechanism. So we had a UKGI Board
 21 member, and one of the concerns was that things that
 22 were distributed that got into the hands of,
 23 essentially, BEIS civil servants, in one form or
 24 another, potentially could be disclosed as part of
 25 a Freedom of Information request. And that whole sort

84

1 of consideration coloured the discussion around Swift
 2 and how it was explained, and how it was kind of
 3 discussed at the time.

4 **Q.** Can we look, please, at POL00103108. An email before
 5 the final report is available, it's dated 22 January
 6 2016, between Jane MacLeod and you:
 7 "Tim
 8 "Following our call with Jonathan Swift today, and
 9 ahead of your meeting with Baroness Neville-Rolfe on
 10 Tuesday, I have summarised our progress."
 11 I'm going to skip over, for the moment, "How to take
 12 forward his recommendations", and just look at "Briefing
 13 to the Minister", if we scroll down:
 14 "We also discussed with Jonathan whether there were
 15 any limitations from his perspective on the content of
 16 your briefing to the Minister. Jonathan confirmed that
 17 there were no limitations from his perspective, although
 18 he noted that if a physical or electronic copy were
 19 provided, this could result in a loss of legal privilege
 20 in connection with the document, recognising that in the
 21 absence of privilege, the report could be disclosable
 22 under a [Freedom of Information] request."
 23 Is that what you were just referring to?
 24 **A.** Yeah.
 25 **Q.** "Accordingly, our recommendation is that you provide
 85

1 limitations from his perspective", on the content of the
 2 briefing but, "if a physical or electronic copy were
 3 provided this could result in the loss of legal
 4 privilege", did you understand that a choice fell to be
 5 made from that advice?
 6 **A.** Yes. I think I probably, to a certain extent -- well,
 7 no, actually, looking at it, I think what I understood
 8 was that something that was physical, if it was -- if
 9 things were put down and written physically or typed
 10 physically, that could be subject to a loss of legal
 11 privilege. And I suppose, perhaps from that, I sort of
 12 conflated, you know, what could I say to the Minister?
 13 I don't, you know, did that mean I could only say to her
 14 what was in a piece of paper? I don't know.
 15 **Q.** More specifically, did you understand that you had
 16 a choice to make: I can either brief her orally along
 17 the lines set out in those four bullet points; or I can
 18 give her a copy of the report, and that may result in
 19 a loss of privilege?
 20 **A.** My recollection, for what it's worth, is that I think we
 21 all, including the Minister's civil servants, were kind
 22 of not assuming, but felt that this was going to be
 23 a document that had legal privilege. So, with
 24 hindsight, you're right, there was potentially
 25 a decision to be made, but we fell into the "It's
 87

1 a verbal briefing to the Minister that in response to
 2 the question 'Was there anything further that [Post
 3 Office] should do?':
 4 "[1] Jonathan has made a series of recommendations
 5 which have been accepted by [the Post Office].
 6 "[2] These recommendations will be followed up as
 7 soon as possible.
 8 "[3] In relation to 2 of the IT related
 9 recommendations, the scope of work required to discharge
 10 the recommend is uncertain, and we will therefore
 11 commission work to determine whether the work is
 12 feasible.
 13 "[4] We will provide you with regular updates on
 14 progress of this work, and you will therefore be able to
 15 provide updates to the Minister in future briefings.
 16 "Once the work is completed, we will need to
 17 consider whether the Minister requires anything in
 18 writing from you and whether any such document would be
 19 made publicly available."
 20 So this is a reflection of a meeting that I think
 21 Jane MacLeod had, or a call that Jane MacLeod had, with
 22 Jonathan Swift, and advice as to how you are to brief
 23 the Minister. Correct?
 24 **A.** Looks like it, doesn't it? Yeah.
 25 **Q.** The sentence, "Jonathan confirmed there were no
 86

1 legally privileged so we'll do the verbal briefing
 2 instead".
 3 **Q.** Did you realise at the time that there was a choice --
 4 **A.** I don't think so, if I'm honest.
 5 **Q.** -- ie the fact that it was said to be legally privileged
 6 dictated the outcome or the treatment --
 7 **A.** I'm afraid a lot flowed from that, you know, it was
 8 a legally privileged document, therefore we had to speak
 9 around it, and how it was summarised on paper needed to
 10 be thought about, yes.
 11 **SIR WYN WILLIAMS:** Can I ask you, Mr Parker, at the time,
 12 was there any discussion about who enjoyed the privilege
 13 if privilege existed?
 14 **A.** Sir Wyn, I can't, no.
 15 **SIR WYN WILLIAMS:** Because it strikes me at least -- and I'm
 16 not pretending I'm an authority on this -- that there
 17 are only two possibilities, aren't there: either you
 18 personally enjoyed the privilege or Post Office Limited
 19 enjoyed it?
 20 **A.** Again, I have to answer you honestly and say my
 21 knowledge of legal privilege at the time wasn't
 22 sufficiently sophisticated -- is probably the best
 23 description I can give it -- to differentiate between
 24 was it privileged to me or was it privileged to Post
 25 Office? I just kind of took legal privilege to mean it
 88

1 was kind of privileged, you know, like, full stop.
 2 **SIR WYN WILLIAMS:** Yes, and I'm not really asking you to
 3 address your mind to the distinction, as opposed to
 4 whether there was any discussion about that distinction?
 5 **A.** No, not that I can recall.
 6 **SIR WYN WILLIAMS:** Finally, you'd obviously know from this
 7 Inquiry that it's possible for a party who enjoys legal
 8 privilege to waive that privilege if someone asked them
 9 to, like I asked the Post Office in this Inquiry. Did
 10 anybody, either on the POL Board or in Government or
 11 civil servants, ask you to waive legal privilege, if
 12 this document was indeed privileged?
 13 **A.** I can't confirm that because I can't remember, is the
 14 honest answer to that question. But the fact that --
 15 I can only say that, you know, nothing happened in that
 16 regard, and it doesn't stick in my mind as a topic that
 17 was raised at the time.
 18 **SIR WYN WILLIAMS:** So on the state of the evidence at the
 19 moment -- and things may change, obviously, because we
 20 are going to hear from people who may have a view of
 21 this -- but at the moment there's nothing to suggest
 22 that anyone asked that there be a waiver of privilege?
 23 **A.** For my recollection, the answer to that is no.
 24 **SIR WYN WILLIAMS:** Fine.
 25 **MR BEER:** A related question to that, Mr Parker: did you

89

1 **MR BEER:** Good afternoon, sir, can you see and hear us?
 2 **SIR WYN WILLIAMS:** Yes, thank you.
 3 **MR BEER:** Thank you.
 4 Mr Parker, can we just look at some documents that
 5 were created years later --
 6 **A.** Yeah.
 7 **Q.** -- in 2020 --
 8 **A.** Mm-hm.
 9 **Q.** -- which speak to the issues that we're currently
 10 discussing, starting by looking at UKGI00011785. This
 11 is an email from Tom Cooper, who I think you'll know, to
 12 Sarah Munby, who I also think you'll know. It's dated
 13 Sunday, 19 April 2020. It says the:
 14 "... information attached contains legally
 15 privileged information.
 16 "Do not forward ...
 17 "Ahead of our meeting to discuss [the Post Office],
 18 which I hope is happening this week, I'm attaching the
 19 key documents for us to consider."
 20 If you scroll down:
 21 "The following documents are attached:
 22 "Copy of the QC's report. Suggest you read the
 23 recommendations which are at the back.
 24 "Copy of Tim Parker's letter to the Minister which
 25 followed delivery of the QC's report."

91

1 inform Baroness Neville-Rolfe, the Minister, or anyone
 2 else within the Department or ShEx, that you wouldn't be
 3 providing Government with a copy of the report because
 4 that was on the basis of legal advice received, that
 5 doing so could result in a loss of privilege? So not
 6 only was that the reason for acting --
 7 **A.** Yeah, I understand --
 8 **Q.** -- that was the explanation given?
 9 **A.** Yeah, so all I can tell you is that I think -- I'm not
 10 sure what the Minister was told exactly but I have this
 11 report and I have absolutely no reason not to show this
 12 to people. I've got no vested interest and so
 13 I conclude, looking back, that I must have felt that the
 14 advice I'd been given was not to share the report
 15 physically with the Minister.
 16 **Q.** But you've got no recollection whether that was
 17 explained, in terms?
 18 **A.** I haven't, no.
 19 **MR BEER:** Thank you.
 20 Sir, it's 12.25. Can we take the second morning
 21 break until 12.35?
 22 **SIR WYN WILLIAMS:** Yes, of course.
 23 **(12.25 pm)**
 24 **(A short break)**
 25 **(12.36 pm)**

90

1 We're going to look at that in a moment. There was
 2 another document that is redacted.
 3 If we scroll up, please:
 4 "The subject of the meeting is the reporting to
 5 Ministers and Governance in the Company that took place
 6 after Tim Parker was appointed Chairman."
 7 So there's a meeting in 2020 about the reporting by
 8 you and others to ministers, and governance in the
 9 company back in 2015, essentially:
 10 "The Minister at the time was Baroness Neville-Rolfe
 11 who asked him to appoint a QC to review the handling of
 12 the Horizon IT dispute ..."
 13 That's not entirely accurate, is it? She did not
 14 ask you to appoint a QC?
 15 **A.** No, that's not entirely accurate, you're right.
 16 **Q.** "... and satisfy himself that issues had been handled
 17 appropriately."
 18 That's more accurate?
 19 **A.** That's more accurate.
 20 **Q.** Then scroll down, "The following documents are
 21 attached". It says in the penultimate paragraph:
 22 "In addition to the above, it seems that neither the
 23 QC's report, nor the existence or conclusions of the
 24 follow-up work commissioned to deal with the QC's report
 25 were known to the Board of the Company or to BEIS."

92

1 Is that accurate on your understanding?
 2 **A.** Not entirely, I don't think. I think in relation to the
 3 Board, although they didn't see a copy of the swift
 4 report, I'm pretty sure that Paula Vennells summarised
 5 the recommendations.
 6 **Q.** We're going to come to that in a moment.
 7 **A.** I think so, and I think also that, as Jane MacLeod said
 8 in her evidence, she provided a briefing. So I think
 9 it's not quite true to say they were unaware of the
 10 existence or the conclusions of the Board and I would
 11 say BEIS -- well, BEIS certainly knew about the report,
 12 I think. Obviously, they didn't see it, but I think
 13 they were aware of it, yes.
 14 **Q.** The word "existence" seems to apply to the follow-up
 15 work, rather than the report itself?
 16 **A.** "... nor the existence or the conclusions" --
 17 **Q.** Of the follow-up work.
 18 **A.** -- "of the follow-up work ..."
 19 Oh, I see, I see the point --
 20 **Q.** It's not talking about the existence --
 21 **A.** I understand the point you're making now.
 22 **Q.** On your understanding, did --
 23 **A.** Yeah, so I think that was part of the consequences of
 24 the report being stopped, effectively, later in May or
 25 June, and the work being taken forward under the aegis

93

1 **A.** At what point in time?
 2 **Q.** At any point in time.
 3 **A.** I'm not entirely sure anybody has put this point to me,
 4 actually. I think, certainly when Tom Cooper became
 5 aware of it, I think he probably had a discussion with
 6 Ken McCall, and this was the output of the discussion.
 7 But I can't recall anybody coming up to me in the
 8 corridor and saying, "Hey Tim, looking back nine years,
 9 you made a bit of a decision that was wrong and we
 10 think's a significant error of judgement, you just about
 11 scrape by and cling on to your job here"; no, nobody
 12 said that.
 13 **Q.** Never mind corridors, was there anything more formal?
 14 **A.** No.
 15 **Q.** It would have been five years, not nine.
 16 **A.** Five years.
 17 **Q.** Was there anything more formal by which you were
 18 chastised essentially, for your decision?
 19 **A.** Yes, not that I can recall but sometimes unpleasant
 20 events are put out of one's mind, so I might have got
 21 this wrong but I don't think so.
 22 **Q.** That's a different issue, whether you got it wrong?
 23 **A.** Well, I might have got it wrong, in terms of do
 24 I remember it, is the point I'm making, yes.
 25 **Q.** I see. The email continues:

95

1 of the General Counsel in the context of the litigation.
 2 **Q.** Thank you. Can we look at UKGI00012703. This is
 3 seemingly a meeting later in the year, this email refers
 4 to, again circulating within UKGI on 16 September 2020.
 5 It's not a communication to you but it's about you, and
 6 I want to ask you some questions:
 7 "Ahead of our call this afternoon, this is just to
 8 update you that Ken McCall the [Senior Independent
 9 Director] ..."
 10 I think the SID, is that correct?
 11 **A.** Yeah, the SID, yeah.
 12 **Q.** "... has confirmed that, having spoken to other members
 13 of the Board as he deemed appropriate, he does not think
 14 it appropriate to take any action in relation to Tim
 15 Parker's decision-making around the QC's review in 2015
 16 of POL's handling of the Horizon complaints.
 17 "His rationale is the same as reported previously.
 18 Ken [McCall] believes Tim [you] made a significant error
 19 of judgement in accepting legal advice that the QC's
 20 report and, as a consequence the follow-up work, should
 21 not be shared with the Board."
 22 Firstly, was that put to you, that you had made
 23 a significant error of judgement in accepting advice
 24 that the report and therefore the follow-up work should
 25 not be shared with the Board?

94

1 "... he has some sympathy [that's Ken McCall] with
 2 the fact that you would have had to take a very strong
 3 position against the legal advice at the initial stage
 4 of his tenure to achieve a different outcome. Overall,
 5 Ken [McCall's] view is that [you have] been a strong
 6 force for positive change in the company while [you
 7 have] been Chairman and it would be
 8 unfair/disproportionate to take action over this
 9 specific issue.
 10 "I haven't asked him to put any of this in writing
 11 or come in to meet Ministers or officials to discuss,
 12 but this is an option if the decision is to take this
 13 further at our call ..."
 14 Was that explained to you, that an option was to
 15 take formal action against you but, on balance,
 16 a decision was taken not to do so because this was early
 17 in your tenure. You would have had to have taken
 18 a strong position to go against legal advice that you
 19 received and that, overall, you have been a positive
 20 force for change?
 21 **A.** The answer is -- and, again, I'm searching my
 22 recollection here, because I don't want to give you
 23 an answer that isn't true. I honestly can't remember
 24 having a formal discussion about this.
 25 **Q.** Can we --

96

1 A. Can I say something about this because --
 2 Q. Yeah, sure.
 3 A. -- I do feel it's quite a fine hindsight judgement to
 4 have made that this is a significant error of judgement.
 5 I think that Swift was something which produced some
 6 good consequences. The first recommendation, the second
 7 recommendation, the seventh recommendation and,
 8 ultimately, the eighth recommendation were followed
 9 through. The work, which no doubt we will discuss
 10 later, in Bramble, was also substantially followed
 11 through and informed the Post Office's litigation.
 12 And so I fully accept that, had Swift been discussed
 13 at the Board, it may have led to a different approach to
 14 the litigation.
 15 But I should say that it remains my view to today
 16 that, once the litigation has started, or had started,
 17 and although I think we'll see it wasn't necessarily
 18 handled in the best and cooperative manner, the
 19 litigation, the GLO, ultimately proved to be
 20 a comprehensive -- what's the best word I can find?
 21 A comprehensive settlement of a lot of very complex
 22 issues. And I have replayed in my mind, Mr Swift (*sic*),
 23 what might have happened had we not, you know, had the
 24 GLO and everyone had read Swift and said, "Oh, there's
 25 a problem." the problem is that, you know, our contract
 97

1 wrong, and a very large amount of money is payable to
 2 all concerned. And, unfortunately, it's just taken --
 3 following the ultimate settlement in the trials, it's
 4 just taken far too long.
 5 Sorry to give you an extensive extemporary on all of
 6 that but you can imagine someone who has sat in this
 7 seat looks back and says how could it have been better,
 8 how could it have been different, how could it have been
 9 faster?
 10 Q. Are you saying by that answer that it needed a group of
 11 brave and determined subpostmasters to hold the Post
 12 Office to account by bringing the Post Office before
 13 a court, and that the Post Office was incapable often
 14 doing it itself?
 15 A. I'm aware that the counter-argument to all of this is
 16 that there should -- you know, it should have been
 17 something that was resolved inside the Post Office
 18 without the recourse to the litigation and, with
 19 hindsight, you know, the postmasters, Sir Alan Bates,
 20 should never have been required to mount a Group
 21 Litigation Order. I understand that. All I'm saying is
 22 that, once it was in train, had it been managed a bit
 23 better, then a lot of complex issues might have been
 24 determined without the delay and without the cost. But
 25 a judge review of all these issues, I still think, one
 99

1 with the subpostmasters is completely wrong, so we'd
 2 better tear it all up", and somebody had said, "Oh, by
 3 the way the computer system has got a lot of bugs, and
 4 it's unreliable".
 5 And I've replayed in my mind exactly what might have
 6 happened then, which is that we would have gone to our
 7 paymasters, the Government, and said, "We've got
 8 a slight problem. Our contract that we've had for
 9 a long time is not fair. We've got another problem,
 10 which is that our computer system, certainly Legacy
 11 Horizon, you know, anecdotally, it's full of bugs", or
 12 we got somebody to independently apparently suggest
 13 that.
 14 My view is that the debate that would have ensued
 15 between, you know, "So what is a reliable system?" and
 16 "What are the consequences and, therefore, what
 17 compensation is due?" and "The contract isn't fair".
 18 And so we'll go through all of that. I do believe,
 19 whatever the impediments placed in its way -- and maybe
 20 it could have been handled a lot better -- but
 21 a judge-determined settlement of all these issues has,
 22 and should have resulted already, in a comprehensive
 23 compensation settlement for all affected.
 24 And the result of all this should have been -- or in
 25 my view -- that this whole thing has been completely
 98

1 way or another, was the right way to get, you know,
 2 an outcome in the end, yes.
 3 Q. So you are saying that, irrespective of the things that
 4 we're going through now, even if things had been done
 5 differently, it would have always have taken a judge to
 6 hold the Post Office to account?
 7 A. No, I'm saying -- I think what I'm saying is that
 8 a judge -- of course, holding to account -- you're
 9 absolutely right, the result of any judgment would hold
 10 the Post Office to account. All I'm saying is that it
 11 would have been in my view, practically speaking,
 12 although I can perfectly accept this isn't the right
 13 outcome, but, given where we got to, trying to see if
 14 this could have been managed internally to the same
 15 result, I'm not sure.
 16 Q. Can we move forwards, please, to UKGI00019313. This
 17 appears to be, Mr Parker, the culmination of those
 18 meetings that we've just read about happening in the
 19 emails, discussion over what to do with you about your
 20 conduct in 2015/2016, concerning the Swift Review.
 21 It's a letter directly to you from Sarah Munby, then
 22 Permanent Secretary at BEIS:
 23 "Dear Tim ...
 24 "As part of our preparation for the BEIS Select
 25 Committee hearing which had been scheduled for March, we
 100

1 received from Post Office a copy of the report prepared
2 by Jonathan Swift QC that was commissioned by you at
3 Baroness Neville-Rolfe's request after your appointment
4 as Chair in 2015. We understand from the work done
5 recently by the company and its advisers to look at the
6 history of Horizon that the findings and recommendations
7 by Jonathan Swift were not shared with the rest of the
8 Post Office Board.

9 "We understand that you were advised at the time by
10 the Post Office's General Counsel that for reasons of
11 confidentiality and preserving legal privilege the
12 circulation of the report should be strictly
13 controlled."

14 That sentence there accords with what you've told us
15 today, doesn't it?

16 **A.** I think it does, yes.

17 **Q.** "Nevertheless, given the background of Parliamentary
18 interest, the fact that your review was commissioned by
19 the Minister responsible for the Post Office and the
20 potential significance of the recommendations made by
21 Jonathan Swift, we consider it was a mistake not to have
22 ensured that the whole Board had an opportunity to see
23 and discuss the detail of its findings and agree what
24 any next steps should be. With hindsight, this
25 information should have been seen by the Board and we

101

1 from the Horizon cases as well as implementing the
2 changes needed to ensure that such issues never arise
3 again", and then a thank you.

4 So, as far as you're aware, was this the endpoint or
5 the culmination of the consideration by Government as to
6 its approach to your decision not to disclose the report
7 to the Post Office Board back in 2015?

8 **A.** Well, I received this letter -- when is it dated -- at
9 some point in --

10 **Q.** October 2020.

11 **A.** -- in 2020 and I haven't heard anything subsequently so
12 I think you can conclude from that that the answer is
13 yes.

14 **Q.** That was the end of it?

15 **A.** *(The witness nodded)*

16 **Q.** Okay. Can I just go back to what you and the Chief
17 Executive, Paula Vennells, did say about the report and
18 its recommendations at the time, to see, irrespective of
19 the approach that BEIS and Government took subsequently,
20 what information was disclosed, first by looking at
21 POL00158304.

22 **A.** And, by the way, may I say something on this letter
23 before we move on?

24 **Q.** Absolutely.

25 **A.** Can we just --

103

1 are disappointed that it wasn't."

2 You mentioned earlier being taken aside in
3 a corridor and being essentially chastised or told off.
4 This is the written equivalent to that, isn't it?

5 **A.** Yes, I think it definitely is, yes.

6 **Q.** "As a rule, we think it is quite difficult to envisage
7 any circumstances where issues of legal privilege or
8 confidentiality should prevent relevant information
9 being shared with a company's Board. You won't need us
10 to remind you of the importance of effective corporate
11 governance and that the role of the Board is to ensure
12 the company's prosperity by collectively directing the
13 company's affairs, while meeting the appropriate
14 interests of its shareholders and relevant
15 stakeholders."

16 Then there's a counterbalancing point or paragraph:

17 "Finally, we also recognise that while you have been
18 chair and under Nick Read's new leadership, the Board
19 has instigated a frontally different approach to
20 handling the grievances bought by postmasters affected
21 by Horizon as well as initiating significant changes to
22 the organisation, processes and culture of the
23 organisation. These are to be welcomed and we continue
24 to encourage the company to act quickly and decisively
25 to do what it can to remedy the remaining issues arising

102

1 **Q.** Go back to the first page?

2 **A.** -- scroll back to the first page if that's all right.

3 **Q.** Then scroll down.

4 **A.** Okay. Let me -- I think again, at the risk of sounding
5 a little boring on the subject, I think it's important
6 to place what I would accept with hindsight was
7 a misjudgement in context.

8 **Q.** Thank you.

9 **A.** So the first point to note is that I'm not a lawyer and
10 I received very strong legal advice, which I took.

11 The second point is that I did that in good faith.
12 I had no reason to deliberately hide this thing or chuck
13 it into the long grass.

14 And the third point to make is that it's easy, in
15 the context of this Inquiry, to imagine that all the
16 chairman is doing is looking after issues to do with
17 Swift and looking after issues to do with Horizon, and
18 I have to keep reminding you that that is not the case.
19 There is an awful lot going on in this business and
20 an awful lot of stuff that needs addressing. So having
21 had, you know, a slap over the wrists from this, I can
22 perfectly see the response but I think I'd just like you
23 to bear in mind that there is context to these things,
24 and that sometimes it's easy to overlook that.

25 **Q.** I think that context should include that, when you

104

1 started working as Chairman, you were working for
 2 a minimum of one and a half days a week?
 3 **A.** We can get into a discussion about what makes
 4 an effective time allocation --
 5 **Q.** I was just asking a simple question, Mr Parker. When
 6 you started, you were on a minimum of one and a half
 7 days a week?
 8 **A.** Are you asking me that as a question of fact, are you?
 9 **Q.** Yes.
 10 **A.** Yes.
 11 **Q.** Then also a question of fact, in November 2017, you
 12 asked for that to be reduced to two days a month, didn't
 13 you?
 14 **A.** I did. Can I also, as you've asked the question about
 15 time, just explain to you a little bit about the
 16 perspective of being a chair and time, and what makes
 17 an effective chair, based on the experience that I've
 18 had. So being a chair is about a number of different
 19 things and it certainly is about time spent in
 20 a business. But it's also about the capacity to
 21 understand business problems and the capacity to strike
 22 up effective relationships with the key people in
 23 a business, especially the CEO.
 24 So you asked the question, immediately after this,
 25 about time with a slight implication, I suspect -- maybe
 105

1 take these forward to demonstrate the highest possible
 2 standards of rigour and fairness in the handling of the
 3 Horizon related complaints."
 4 Is this the kind of information, to your
 5 recollection, that was provided to the Board, ie the
 6 extent of the information provided to the Board about
 7 the contents and recommendations of the Swift Review?
 8 **A.** Mm, I think she also had a table of the recommendations.
 9 But that's it. Yeah.
 10 **Q.** Was it your view that the report did set out only
 11 a limited number of recommendations?
 12 **A.** The way it's put there, it's sort of fairly kind of
 13 benign. I think it's set out eight/nine -- eight
 14 recommendations. I mean, it depends on your language,
 15 doesn't it?
 16 **Q.** It might be said that underplays the overall outcome --
 17 **A.** I think that's a -- you know, it you could say it's
 18 a limited number because there aren't many or you could
 19 say it kind of gives the impression there's not much
 20 going on. Yeah.
 21 **Q.** Let's just look at what the Minister was told,
 22 UKGI00006482. This is a couple of days later,
 23 26 January 2016. Meeting between you, Baroness
 24 Neville-Rolfe, Laura Thompson and Andrew Smith. Then
 25 "Main points". The first few bullet points concern
 107

1 wrongly -- that somehow what happened here was the
 2 result of me not spending enough time at the Post
 3 Office, and I would certainly rebut that suggestion.
 4 I would say that I was a very active, energetic
 5 chair who took a lot of time and spent time with people
 6 to understand the business, and I certainly don't think
 7 the time, one and a half days, or whatever it is, was
 8 the reason why I made this error of judgement, with
 9 hindsight.
 10 **Q.** Can we go back to the note, please, at POL00158304.
 11 This was the note I was going to move to, to look at
 12 what was said by you and the Chief Executive about the
 13 Swift Review at the time. These are speaking notes for
 14 a Board meeting of 22 January 2016, seemingly a speaking
 15 note of Ms Vennells. Can we go forwards, please, to
 16 page 6, please, and scroll down, please.
 17 Thank you. Just there "Sparrow", "Chairman's
 18 Review".
 19 Remember, this is 22 January 2016, before the final
 20 report was received on 8 February:
 21 "Jonathan Swift and Christopher Knight, the
 22 barristers advising Tim Parker on the adequacy of scheme
 23 processes, shared their draft report with the chairman
 24 last week. The report sets out a limited number of
 25 recommendations and [Post Office] will, where possible,
 106

1 other things, which is reflective of the point you made
 2 a moment ago, Mr Parker, that this wasn't the only
 3 issue. If we look at the penultimate bullet point:
 4 "TP [that's you] updated on the Horizon
 5 investigation. He said that the QC was about to report.
 6 He had found no systemic problem. [Tim Parker] thought
 7 that the issue might have passed its peak interest."
 8 Firstly, did you say that to Baroness Neville-Rolfe?
 9 **A.** I have no idea. I think I certainly would have
 10 commented that, as far as the computer system is
 11 concerned, coming back to our previous discussion, and
 12 I think it was reflective, broadly speaking, of what was
 13 in Swift, there wasn't a systemic problem, whatever
 14 "systemic" was understood to mean.
 15 In terms of the second thing, I think I must have
 16 just commented that, in terms of the press, it had at
 17 that point passed peak interest and that might have been
 18 in response to a question, or whatever. But that would
 19 have just been me commenting on that.
 20 **Q.** Were they truly the takeaways from the Swift report, as
 21 reflected there: no systemic problem, issues passed its
 22 peak interest; rather than he's made eight
 23 recommendations of substance that need taking forwards,
 24 they pose significant reputational issues, to Post
 25 Office?
 108

1 **A.** Do you know, I don't know. I mean, I'm not sure what
 2 the substance of the conversation is, or why, you know,
 3 why those are the two sentences. I just can't tell you.
 4 I just come back to what I said, which is that it was
 5 a report which I think it was -- it wasn't the final
 6 report at that point, was it? It was --
 7 **Q.** No, not by this time.
 8 **A.** Yeah.
 9 **Q.** I think the eight recommendations at this time were as
 10 they were to appear.
 11 **A.** They were, yeah, you're right.
 12 **Q.** Lastly on this, then, before we break for lunch, can we
 13 look at POL00024913. Thank you. This is a formal
 14 letter that you sent to Baroness Neville-Rolfe on
 15 4 March 2016. We were looking previously at a Board
 16 meeting in January and a meeting with Baroness
 17 Neville-Rolfe in January. This is therefore after the
 18 8 February 2016 final report had been provided. You
 19 say:
 20 "At our meeting on 26 January 2016, [that's the one
 21 we just referred to] I provided you with an update on
 22 the work I have undertaken with the assistance of
 23 Jonathan Swift and Christopher Knight, both of 11 [KBW]
 24 Chambers to review the Post Office's handling of
 25 complaints made by subpostmasters about the operation of
 109

1 **A.** That's exactly the case. Yeah.
 2 **Q.** The letter continues:
 3 "I am, of course, aware that once the additional
 4 strands of work I am pursuing are complete, we will need
 5 to find an appropriate method of communicating the
 6 results of my review to a wider audience."
 7 In the first paragraph, you refer to "my initial
 8 findings" and in the second paragraph you refer to "my
 9 review". Had you made any findings and had you
 10 conducted a review?
 11 **A.** I think that's a little semantic. I mean, it was
 12 conducted on my behalf and whether I sort of finessed
 13 the thing to suggest it was only me or my review,
 14 I certainly took responsibility for it, which is the
 15 main point, I suspect.
 16 **Q.** The purpose of asking the question was not to delve into
 17 semantics but was to understand whether you understood
 18 this to be your findings and your review, and whether
 19 you had the opportunity to disagree with anything that
 20 Mr Swift had recommended?
 21 **A.** I think it's fair to say that, as I discussed earlier
 22 this morning, I thought the Swift Report was a good
 23 piece of work and it came out with some good, sensible
 24 recommendations which I supported, and I did discuss the
 25 report with Jonathan Swift so, at that point, I'm sure
 111

1 the Horizon software system. I now write to set out
 2 further information about the approach to the review,
 3 the scope of work undertaken so far, and my initial
 4 findings. I also outline my plans to bring the work to
 5 a conclusion.
 6 "Before doing so, I wish to stress that this update,
 7 and the work which underpins it, reports on the legal
 8 advice I am currently receiving and is, accordingly,
 9 subject to legal professional privilege and provided in
 10 confidence."
 11 What does that mean, that sentence?
 12 **A.** I, again, followed the suggested text around legal
 13 advice, and there was this concern which I've -- I think
 14 I've highlighted around, you know, anything that goes
 15 into the hands of ministers and civil servants is
 16 potentially disclosable under Freedom of Information,
 17 and that seemed to be a concern that generally coloured
 18 discussions of this thing.
 19 **Q.** In fairness to you, this was a letter drafted for you by
 20 Ms MacLeod and the draft of the letter was itself
 21 reviewed by Mr Swift before it was signed, and I think
 22 you were told by General Counsel that the letter had
 23 been amended to reflect amendments that he had
 24 suggested. You cover that off in your witness statement
 25 at paragraph 65.
 110

1 I felt happy and willing to take ownership of it.
 2 **Q.** You say under "Scope of the Review", "My objectives were
 3 as follows", and then you set out essentially the term
 4 of reference?
 5 **A.** Mm.
 6 **Q.** Then if we go over the page, please, there is then, over
 7 the course of four pages, a summary of the headline
 8 findings of the review and the recommendations made
 9 against each of them. So, to that extent, the
 10 Government was informed of headline findings -- I'm not
 11 going to go through each of them now -- and the
 12 recommendations made.
 13 If we go to the last page, please, page 4. If we
 14 just scroll through so you and others can see the detail
 15 that was included in the letter going to Government.
 16 Thank you. Stop there. Under "Next steps":
 17 "I have commissioned independent persons to
 18 undertake the necessary work. I am satisfied that they
 19 meet the standards of expertise and independence
 20 appropriate to the tasks.
 21 "I ... share your aim that matters should be drawn
 22 to a conclusion as soon as possible consistent with the
 23 need for the work that remains to be done to a high
 24 standard. I hope that you understand that, particularly
 25 in relation to the further testing of the Horizon
 112

1 system, this work may take some time", there may be
 2 a report in May.
 3 Then skipping a paragraph, two matters:
 4 "... as I have noted above, a number of
 5 subpostmasters have made applications to the [CCRC] for
 6 the circumstances of their convictions to be looked into
 7 with a view to those cases being brought back to the
 8 Court of Appeal. That work is ongoing. Second, [JFSA]
 9 is reported to have received funding to instigate civil
 10 proceedings against the Post Office ... at the time of
 11 writing, no claim has been issued nor any Letter of
 12 Claim been received."

13 **A.** Mm-hm.

14 **Q.** So, overall, you were, I think, advised to write
 15 a letter of this length and detail -- is that right --

16 **A.** Yes.

17 **Q.** -- and therefore, happy that this information was not
 18 itself information which would lose privilege?

19 **A.** That's quite an interesting point and I think the -- my
 20 sense is that this letter was written, yeah, and it's
 21 quite a good summary, I agree. And -- but I think that
 22 it's probably trying to go as far as possible to outline
 23 Swift without necessarily handing the report over.

24 **MR BEER:** Thank you.

25 Sir, it's 1.10. Can we break now, please, until
 113

1 **A.** Ah, I'm sure we discussed it and, obviously, we ended up
 2 with a selection of different people looking after
 3 different recommendations, as I recall.

4 **Q.** Before coming to the issue of who carried some of the
 5 recommendations into effect, was there a person who had
 6 a responsibility for determining whether the
 7 recommendations were taken forward or not?

8 **A.** As I understood it, the General Counsel.

9 **Q.** You also said that you thought that all of them were
 10 going to be taken forwards; is that right?

11 **A.** Yes.

12 **Q.** So she didn't have anything to determine?

13 **A.** I didn't think so, no.

14 **Q.** Right.

15 **A.** Yeah.

16 **Q.** So your understanding was that all eight recommendations
 17 were going to be taken forwards. What role did the
 18 General Counsel, Jane MacLeod, therefore play?

19 **A.** Her role was to work with the relevant parties and
 20 report back to me.

21 **Q.** Is that the role that you delegated to her, then --

22 **A.** Exactly.

23 **Q.** -- rather than deciding which recommendations were or
 24 were not taken forwards?

25 **A.** I see your point. As I recall, there wasn't a debate
 115

1 2.00?

2 **SIR WYN WILLIAMS:** Yes, of course.

3 **MR BEER:** Thank you very much, sir.

4 **THE WITNESS:** Thank you.

5 (1.12 pm)

6 (The Short Adjournment)

7 (2.00 pm)

8 **MR BEER:** Good afternoon, sir. Can you see and hear us?

9 **SIR WYN WILLIAMS:** Yes.

10 **MR BEER:** Thank you very much.

11 Mr Parker can we turn to the recommendations, the
 12 eight of them that Jonathan Swift made in his review.

13 Who in your view was responsible for determining whether
 14 and to what extent the recommendations should be taken
 15 forwards?

16 **A.** So this responsibility I delegated to the General
 17 Counsel.

18 **Q.** Why did you delegate responsibility for deciding which
 19 recommendations were to be taken forward to the General
 20 Counsel?

21 **A.** I rather assumed that all of the recommendations were
 22 going to be taken forward.

23 **Q.** So I asked whose responsibility was it for determining
 24 which recommendations were taken forward and you said
 25 you delegated that to the General Counsel?
 114

1 about which recommendations but just to take all of them
 2 forward with appropriate parties.

3 **Q.** Did it occur to you that the Board ought to play a role
 4 in deciding the extent to which recommendations were
 5 taken forwards and, if so, how they were to be taken
 6 forwards?

7 **A.** We had a situation after the report was completed where,
 8 as I think I explained, the report wasn't shared with
 9 the Board and the understanding was the recommendations
 10 would be taken forward, and my plan was to share the
 11 outputs at that stage. So this was something that went
 12 straight from the General Counsel to the relevant
 13 parties, and so the Board was not involved, no.

14 **Q.** Was that a product of the legal privilege issue that we
 15 discussed this morning?

16 **A.** It was the product of the perception that I had with the
 17 legal privilege issue, yes.

18 **Q.** Thank you. Can we look, please, at POL00103190, and the
 19 bottom email, please, 13 May 2016, Jane MacLeod to you:

20 "Here is my regular fortnightly update on the
 21 progress of your review and the litigation."

22 Is it right that she provided an update regularly to
 23 you?

24 **A.** Yes. I mean, I'm sort of drawing that conclusion from
 25 the first sentence, here.
 116

1 Q. Was the relationship between you and Jane MacLeod
2 essentially one-to-one, ie you saw her as driving the
3 recommendations forward as appropriate on your behalf?

4 A. Yes, I think that's a fair characterisation.

5 Q. She says -- we can look at these quickly:

6 "Helpline -- In relation to the allegation that our
7 Helpline may have provided incorrect advice to the
8 subpostmasters which resulted in a loss to the accounts,
9 Bond Dickinson (the external firm conducting the work)
10 has now completed its investigations. Although some
11 investigations were limited because certain records are
12 no longer available and there were inaccuracies in the
13 information provided by complainants, their draft report
14 reveals that there is no evidence to support the
15 allegations that have been made. We are currently
16 reviewing the report ahead of sharing it with Jonathan
17 Swift to seek his view as to whether it sufficiently
18 discharges his recommend in this areas, but we are
19 confident that it should."

20 Then:

21 "Horizon System -- We have had further meetings with
22 Deloitte in relation to the extent of the work necessary
23 to discharge Jonathan's 3 recommendations on the testing
24 of Horizon, and they have begun work on the substantive
25 phase of that work. It is, by its nature, an iterative

117

1 Does that reflect the fact that the report had been
2 provided to you in draft in January, in final version on
3 the 8 February, and it was now mid-May, and the work was
4 inchoate?

5 A. I think that's true. That's what I was expressing at
6 the time.

7 Q. Did you pick up from the chain that the recommendations
8 made by Mr Swift were being trimmed?

9 A. No. Not especially. Why -- what is behind the --

10 Q. Altered?

11 A. I don't think so.

12 Q. I mean, to take an example, over the page, "Prosecution
13 Practice":

14 "... Swift has confirmed that [Altman] can limit his
15 review to 19 cases presenting specific features and then
16 decide on the basis of those features whether to extend
17 the exercise."

18 That wasn't of the initial recommendation. The
19 recommendation was to review all of the cases, if you
20 remember the recommendation number 1 and 2.

21 A. I see your point. I think I would have taken that at
22 face value to mean that she had talked to Jonathan Swift
23 and, between them, they'd taken a view that that was
24 going to respond to the recommendation adequately.

25 I hadn't picked up, to be honest, that things were

119

1 process in that, dependent on early results, further
2 decisions then need to be made on whether or not to
3 explore further ... I have asked the new [CIO], Rob
4 Houghton, to review the process undertaken by Deloitte,
5 to sense check these further decisions.

6 "Suspense accounts -- ... Deloitte are also
7 conducting the work, into the existence and nature of
8 the relationship between [Post Office's] suspense
9 accounts and specific branch accounts over the relevant
10 period. This is a materially different exercise to the
11 IT testing, and I understand that most of the relevant
12 accounting processes were/are paper-based records and
13 manual reconciliations ...

14 "Prosecution practice -- Jonathan Swift has
15 confirmed that Brian Altman can limit his initial review
16 to those 19 cases presenting the specific features of
17 double charges in question, and decide on the basis of
18 those findings whether to extend the exercise. That
19 work is ongoing."

20 If we go back to the top of the page, page 1, you
21 say:

22 "I think there will be frustration at the time this
23 is taking (indeed I am also beginning to get somewhat
24 frustrated). So what is now the projected timetable for
25 completion on the components of the action list?"

118

1 being, to use your phrase, trimmed, as such.

2 Q. Can we go forwards, please, to POL00241554. We can see
3 at the foot of the page your email, "there will ... be
4 frustration", yes?

5 A. Yeah, yeah.

6 Q. Then top of the page, please. You'll see that Jane
7 MacLeod forwards the email to -- circulates the email to
8 a small team of people: Patrick Bourke, Mark Underwood
9 and Rodric Williams.

10 A. The very same people who received the copy of the
11 original Swift Report.

12 Q. So it's the same select few?

13 A. Exactly.

14 Q. "Please see email from Tim below.

15 "I think it would be helpful to be able to respond
16 with the status of each of the 8(?) actions that were
17 being carried forward, a description of the remaining
18 work and the expected completion time.

19 "... we should consider the work being done by
20 Deloitte and how far we want to address the questions
21 posed by Jonathan."

22 Just stopping there, was it for this small team to
23 decide how far "we" -- presumably the four of them --
24 want to go to address the questions posed by Jonathan
25 Swift?

120

1 **A.** So I think I come back to where I started on this, which
 2 is that I assumed -- perhaps wrongly in retrospect --
 3 but I assumed that the General Counsel's team were (a)
 4 competent, (b) would do things in good faith, and (c)
 5 would respond effectively to the recommendations of the
 6 report.

7 Now, you know, when you get to see these emails that
 8 are shown to me, or form part of the evidence base which
 9 are what's going on, as it were, behind the scenes, it
 10 kind of puts a different complexion on things, a little
 11 bit. So the reason I mention all of that is that, you
 12 know, I'm expressing to you what seemed to me to be the
 13 case. Behind the scenes, of course, you find that, you
 14 know, the motives for doing things perhaps are not quite
 15 as straightforward as one might have imagined.

16 **Q.** There's no suggestion from me, at least, that this email
 17 was provided to you. Was it right for this team to be
 18 seemingly determining whether the recommendations were
 19 taken forwards and, if so, in what way?

20 **A.** So in the world that I normally exist in, I have people
 21 working for me, and they have a job to do, and if I ask
 22 them to do a job they understand and it's correctly
 23 specified. Until I got to the Post Office, I think I'm
 24 right in saying that, throughout my career, I have found
 25 that people went and did what was asked of them with

121

1 Again, that's a similar point, ie the team
 2 determining value to be obtained from further work, in
 3 part based on the extent to which something can be said
 4 about the results of it. Does the same answer that you
 5 gave a moment ago apply?

6 **A.** I can see your point. If I may make one general
 7 observation about this sort of backward-looking, what
 8 were people doing eight years ago, type of thing, you
 9 can only look at the evidence that you have on a piece
 10 of paper and people write sentences which can or cannot
 11 reflect truly what was going on. So I'm not here to,
 12 you know, doubt what is actually written here. But
 13 sometimes things that are recorded don't exactly reflect
 14 what people were doing at the time. I don't know in
 15 this case but I just think it's worth bearing in mind
 16 that you cannot take every sentence that is written and
 17 that you read as gospel in this context.

18 **Q.** That's certainly the case: a number of people have sat
 19 in your chair and said that what they wrote does not
 20 reflect what they meant at all.

21 **A.** Um, very good!

22 **Q.** Can we move on to POL00103214. Look at page 2, please,
 23 and just scroll down. Thank you.

24 It's an email later that month, we were just looking
 25 at 14 May, we're now looking at 27 May, to you, and

123

1 suitable determination and suitable application of their
 2 abilities.

3 And so you -- in retrospect, you might say, well,
 4 these are not the right people because here we are at
 5 the Post Office. But I can only tell you that, under
 6 normal conditions, they should and would have been the
 7 right people and could well have carried out these
 8 recommendations effectively.

9 **Q.** Can I ask you two questions arising from that. Do
 10 I take it from that answer that, if you had known that
 11 this small team had taken upon itself the function of
 12 deciding how far to go to discharge a recommendation,
 13 you would have had something to say about it?

14 **A.** I would have been concerned. I mean, it was
 15 straightforward, "Here are the recommendations", you
 16 know, "Let's go and do something about them".

17 **Q.** The second thing is that you didn't, therefore, know at
 18 the time that this subsurface internal debate within
 19 a select team within Post Office was going on?

20 **A.** No.

21 **Q.** The email continues:

22 "Given the litigation, I suspect there is even less
 23 we are going to be able to say about the results of the
 24 further work, so we need to consider the value to be
 25 obtained from each step."

122

1 Ms MacLeod says:

2 "As flagged at the Board letter this week, I hosted
 3 a call with Jonathan Swift today ask what, in his view,
 4 would be a reasonable course of action for you to take
 5 in relation to his recommendations as to the further
 6 lines of inquiry which could be undertaken, now that the
 7 [Post Office] faces litigation covering essentially the
 8 same ground."

9 So just stopping there, can you recall who told you
 10 and how about litigation being threatened against the
 11 Post Office on behalf of subpostmasters?

12 **A.** I believe I must have been told, at some point after the
 13 receipt of the letter of claim -- now the letter of
 14 claim I think came in the middle of April or end of
 15 April, something like that.

16 **Q.** Can you recall whether you were told that this may have
 17 an impact on the extent to which the eight Swift
 18 recommendations could be carried into effect?

19 **A.** I can't, to be honest. I can't tell you whether this
 20 was the first, you know, glimmer of this happening.

21 **Q.** That's essentially what I'm driving at.

22 **A.** Honestly, I can't tell you for sure.

23 **Q.** In any event, Ms MacLeod reports:

24 "In summary, Jonathan felt that Tony (that should be
 25 de Garr Robinson QC) (the barrister retained to advise

124

1 [Post Office] on its defence to the proceedings) should
 2 first be requested to advise [Post Office] whether in
 3 light of the litigation, the various works teams should
 4 be continued, paused or redefined."
 5 That's essentially telling you that she went off to
 6 Mr Swift, who said, "Don't ask me in the first instance,
 7 go to the person that's conducting the civil litigation,
 8 de Garr Robinson QC, and ask him", yes?
 9 **A.** That is exactly as I understood with hindsight is what
 10 happened, yes.
 11 **Q.** "We will send instructions to [Mr de Garr Robinson]
 12 early next week and expect to have this advice
 13 relatively quickly. Once this advice has been received,
 14 Jonathan has said that he would be happy to discuss with
 15 you how best to take this forward in the context of your
 16 review, as well as considering how to position this with
 17 [Baroness Neville-Rolfe] and others with knowledge of
 18 and interest in the review."
 19 Was this your main means of communication with Jane
 20 MacLeod, ie email, rather than attending the office and
 21 having meetings?
 22 **A.** I'm sure we spoke about it. I'm sure she just sent me
 23 an email about it.
 24 **Q.** You think there was discussion outside of the email as
 25 well?

125

1 **Q.** It contained recommendations that went to the issue of
 2 uncovering potential miscarriages of justice?
 3 **A.** It did.
 4 **Q.** It plainly took a long time to research and complete and
 5 it was a comprehensive report, wasn't it?
 6 **A.** Mm-hm, indeed.
 7 **Q.** Given that one of the reasons for undertaking the review
 8 and some of the recommendations from it related to
 9 matters touching on the safety of criminal convictions,
 10 did it occur to you that undertaking the recommendations
 11 through the aegis of civil litigation against the Post
 12 Office was not the right way forwards?
 13 **A.** So I think we're back to this question of, in this kind
 14 of situation, which I had very little experience of
 15 hitherto, receiving advice from senior counsel on
 16 a legal matter, very strong advice, apparently, I took
 17 that advice and I assumed -- perhaps erroneously -- that
 18 the General Counsel, who also herself was a lawyer,
 19 would have considered and appreciated any implications,
 20 ramifications of doing this, in terms of how the Swift
 21 Report was carried forward.

22 So it's a very difficult question because, you know,
 23 when you look at these things in hindsight, you say,
 24 well, you could have spent some more time discussing it,
 25 or you could have had your own view, or you could have

127

1 **A.** I honestly can't confirm that.
 2 **Q.** Can we go forward to page 1, please, and scroll down.
 3 On 10 June, Jane MacLeod writes further to the email
 4 we've just looked at, and says:
 5 "... we met with Tony [de Garr] Robinson last night
 6 to discuss the Postmaster Litigation. In the course of
 7 that discussion we asked him for his advice as to
 8 whether the work being undertaken for the purposes of
 9 your review should be continued.
 10 "His strong advice was that the work being
 11 undertaken under the aegis of your review should not
 12 continue in the light of the litigation. However, he
 13 also recommended that the subject matter of that work
 14 should continue, provided it is rescoped and
 15 re-instructed for the purposes of the litigation.
 16 "Clearly you will need to inform the Minister and we
 17 will prepare a form of words ..."
 18 Over the page, sign-off from Jane MacLeod.
 19 Then top of the page 1:
 20 "Let us meet to discuss on Thursday."
 21 Yes?
 22 **A.** Looks that way, yes.
 23 **Q.** Now, the Swift Review was a significant piece of work,
 24 wasn't it?
 25 **A.** It was.

126

1 done this. The problem with experts or specialists is,
 2 how do you judge the view of the specialist? Do you get
 3 another specialist to advise you on the specialist or do
 4 you draw the conclusion that your judgement of the
 5 specialist was wrong and the specialist you got is no
 6 good, or that the General Counsel who was advising you
 7 is somehow incompetent, or the whole bunch of them have
 8 somehow, some rather nefarious underhand objective of
 9 potentially holding things up?

10 I'm not sure. But, at the time, I took at face
 11 value what I thought was good advice and the right
 12 advice from people who apparently were qualified to give
 13 it.

14 **Q.** So is a summary of that answer that you thought it
 15 reasonable to rely on the advice of your General Counsel
 16 who had asked the silk the very question that you needed
 17 to be answered, and he had provided an advice which was
 18 said to be very strong?

19 **A.** I am -- all I'm saying -- and you're right, it's not
 20 a bad summary of my 10 or 12 sentences -- that whether
 21 it came from Mr Swift or and with Jane MacLeod, they're
 22 both lawyers, they both understand what's in the report,
 23 they are and were both qualified or -- and certainly he
 24 was -- to give a view. Yes.

25 **Q.** Do I take it that it didn't occur at the time that what

128

1 might be in Post Office's narrow interests in the
 2 conduct of the civil litigation might not be in the
 3 wider interests of wrongly convicted subpostmasters?
 4 **A.** So I think we're touching on this question of -- with
 5 hindsight, of course, it would appear that there were
 6 motives perhaps underpinning some of the advice or the
 7 direction of this that were not wholly fair or right or
 8 in the interests of people who had been wronged. At the
 9 time, however, it seemed to me that the people giving me
 10 advice should be and were doing this in good faith, and
 11 it was the right thing to do.
 12 **Q.** Thank you, can we move forwards. POL00242402. If we
 13 can go to page 4, please, this is a chain that you're
 14 not copied in on but it attributes to you and to the
 15 Post Office some beliefs or intentions. So I want to
 16 ask you about them. It's 8 June now, an email from
 17 Andrew Parsons, the partner at the firm of solicitors
 18 that the Post Office was using to defend the threatened
 19 litigation, to Anthony de Garr Robinson, and he says:
 20 "Tony
 21 "I met with the Post Office litigation steering
 22 group yesterday."
 23 Just stop there: were you a member of the litigation
 24 steering group?
 25 **A.** I wasn't.

129

1 would be ill-advised. Was that a message that came from
 2 you?
 3 **A.** You mean this, about magic QC seals and --
 4 **Q.** No, put aside the magic QC seal. The description of
 5 Post Office are looking to us for reasons not to
 6 complete the recommendations.
 7 **A.** Yeah, well, you know, again, as you said at the outset,
 8 this is something that's going on without my knowledge.
 9 **Q.** That was the question --
 10 **A.** Yes.
 11 **Q.** -- was this going on without your knowledge?
 12 **A.** No, and, just to be clear, it was without my knowledge.
 13 **Q.** So you weren't looking for lawyers to come up with
 14 reasons not to do or undertake the Swift
 15 recommendations?
 16 **A.** No.
 17 **Q.** Do you know who was? It's described here as "POL are
 18 looking to us".
 19 **A.** Yes, I see that. I certainly wasn't part of the "Hey,
 20 you know, can you get Tony to give us some reasons why
 21 we should let up on this".
 22 **Q.** Yes, some top cover --
 23 **A.** No.
 24 **Q.** -- some legal insurance, or some other such phrases I've
 25 heard in my career. That wasn't coming from you?

131

1 **Q.** Do you know who it consisted of?
 2 **A.** I do. I'd have to have a piece of paper in front of me
 3 but, in summary, it was a collection of Post Office
 4 Executives and specialists and legal people.
 5 **Q.** "Their approach to [Jonathan Swift's] recommendations
 6 has shifted slightly.
 7 "Tim Parker ... feels that he has made a commitment
 8 to Baroness Neville-Rolfe ... to follow through on the
 9 [Swift] recommendations unless he is presented with
 10 a persuasive case not to do so."
 11 Is that accurate, that you felt at this time that
 12 you'd made a commitment to the Minister to follow
 13 through on the recommendations, unless you were
 14 presented with a persuasive case not to?
 15 **A.** Yeah.
 16 **Q.** So that's accurate. Then:
 17 "[Post Office] are ... looking to us (and quite
 18 frankly you with your magic QC seal!) to give them some
 19 reasons for why Tim completing the [Swift]
 20 recommendations would be ill-advised."
 21 First, Post Office are looking to us, ie to the
 22 lawyers and to Mr de Garr Robinson, to sprinkle some
 23 magic dust on the answer --
 24 **A.** Mm.
 25 **Q.** -- for reasons why completion of the recommendations

130

1 **A.** That wasn't coming from me.
 2 **Q.** Did you know, in any way, that there was a group of
 3 people within the Post Office looking to stifle or end
 4 the carrying into effect of the Swift recommendations?
 5 **A.** The answer to that question is no.
 6 **Q.** If we scroll down:
 7 "... the recommendations we are talking about are",
 8 and then they're set out, 1, 2 and 3:
 9 "My view [that's Mr Parson's view] is that these
 10 three recommendations plainly overlap with the issues in
 11 the litigation. I can see three reasons why Tim should
 12 not 'conduct' the above investigations:
 13 "1. We, the litigation team, will need to
 14 investigate these points ... We will probably need to do
 15 this on a different timetable to Tim (we having a degree
 16 of time pressure; Tim under less time pressure). We
 17 will also probably require a more robust investigation
 18 given that these points could be tested in court. Two
 19 parallel reviews would be wasteful and could cause
 20 unknown complications should they reach contradictory
 21 results."
 22 Was any of this reasoning explained to you for not
 23 simply carrying into effect the Swift recommendations?
 24 **A.** No. I had certainly not this kind of rationale, no.
 25 **Q.** "2. If these investigations are conducted by Tim there

132

1 is a greater risk that this work is not privileged ...
 2 It would be much safer for these investigations to be
 3 conducted as part of the litigation."
 4 Was that explained to you?
 5 **A.** No. I think the one -- you know, the one sort of view
 6 I had was that this review should be stopped and
 7 repurposed as part of the litigation and, because of the
 8 litigation, the work would continue to be privileged.
 9 **Q.** "3. Even if the risk in 2 above could be guarded
 10 against (say by classing it as part of the [Jonathan
 11 Swift's] ongoing advice to [Tim Parker] --
 12 questionable???), I cannot see how [Tim Parker] could
 13 disclose the results of these investigations to [the
 14 Department] without a risk of waiving privilege
 15 (particularly where there is a possibility that
 16 [Baroness Neville-Rolfe] may then speak to James
 17 Arbuthnot or [Post Office/BIS] could be the subject of
 18 a [FOIA] request."
 19 Was that explained to you as a reason for not
 20 carrying into effect the Swift recommendations or any of
 21 them?
 22 **A.** No, essentially what I got out of all that was what you
 23 saw in, you know, a couple of papers ago, which is the
 24 strong -- the -- I can't remember the exact description,
 25 but it was something like the "strong advice" -- on the
 133

1 last paragraph implicates you, in the sense that it says
 2 that you would feel empowered to say, on the basis of
 3 legal advice, you are ceasing your review, and that
 4 they, the lawyers, are being asked to provide political
 5 cover for you, neither of those things are things that
 6 you asked for?
 7 **A.** No. I got the advice and then used it, you know, used
 8 the advice to essentially communicate with BEIS.
 9 **Q.** So you weren't --
 10 **A.** It wasn't -- I didn't feel empowered myself. I wasn't
 11 aware of being empowered, because, you know, I wanted
 12 a reason to go and tell BEIS the thing was being
 13 discontinued. I received that advice and, as a result
 14 of getting that advice, I went and then communicated it
 15 to the civil servants and onwards to the Minister.
 16 **Q.** Can we move forward, please, to POL00242552.
 17 If we just go to page 3, please. Just to remind
 18 you, the foot of page 3:
 19 "we met with Tony Robinson [*sic*] to discuss the
 20 Postmaster Litigation."
 21 Second paragraph:
 22 "His strong advice was that work being undertaken
 23 under the aegis of your review should not continue ..."
 24 Yes --
 25 **A.** Yes.

135

1 strong advice of senior counsel, the work should be
 2 discontinued and repurposed. I can't remember the exact
 3 form of words but that is the advice that I received.
 4 **Q.** "If we can give [Post Office] a piece of advice that
 5 says [you] should stop any further work, [you] would
 6 then feel empowered to say to [the Department] that, on
 7 the basis of legal advice, he is ceasing his review.
 8 I'm conscious that this feels somewhat unpleasant in
 9 that we are being asked to provide political cover for
 10 [Tim Parker]. However ... shutting down [Tim Parker's]
 11 review is, in my view, still the right thing to do."
 12 The way that last paragraph reads, would you agree,
 13 is it implicates you somewhat in the making of the
 14 request?
 15 **A.** Well, I mean, I certainly was not aware of all of this
 16 stuff going on, as it were, and it certainly looks
 17 a little bit like, you know, these guys are marionettes
 18 and I'm doing my little thing in response to bits and
 19 pieces that they're putting forward. And that's, you
 20 know, very disappointing with hindsight because you --
 21 as I was explaining earlier, you expect to get advice
 22 from lawyers in good faith, you know, good motives and
 23 a good rationale, and I assumed that was what I was
 24 getting.
 25 **Q.** So, directly to answer my point, to the extent that this
 134

1 **Q.** -- 10 June? Then page 2 at the bottom, please, 14 June,
 2 "See below", that's that chain, and your reply saying,
 3 "Let's discuss on Thursday". Jane MacLeod and Rodric
 4 Williams and Patrick Bourke in email discussion:
 5 "... Any approved messaging we want to get across?"
 6 Did you know that the small select team were
 7 formulating messaging for you?
 8 **A.** No.
 9 **Q.** Up the page, please:
 10 "In terms of messages to Tim and from Tim to
 11 [Baroness Neville-Rolfe], I think we're going to have to
 12 address the issue head on: the litigation makes the
 13 Review irrelevant since the issues to be considered will
 14 be put to a higher standard of testing in the courts
 15 ..."
 16 Was that ever explained to you, that the review was
 17 now irrelevant?
 18 **A.** I can't remember that it was explained in those terms,
 19 no.
 20 **Q.** Because of, it is said, a higher standard of testing in
 21 the courts; that wasn't ever explained to you?
 22 **A.** I can't be sure. I mean, I think the main reason this
 23 ended up where it did was the advice I referred to
 24 earlier, which is the strong advice from external
 25 counsel.

136

1 Whether or not this was added, you know, as a sort
2 of rationale, I can't be sure.

3 **Q.** The email continues:

4 "... to continue would be fruitless since we
5 couldn't use its output, senseless in terms of
6 expenditure, and present unnecessary risk to the
7 organisation's legal position."

8 Were those reasons for the review being irrelevant
9 put to you?

10 **A.** No.

11 **Q.** "It is, to my mind, in any event, now clearer than ever
12 that Review (or indeed any other exercise not involving
13 a third party adjudicator (not mediator)) just isn't
14 capable of putting these issues to bed in the minds of
15 some. That does not need to be pitched as a bad thing:
16 yes, it frustrates the Review and is 'uncomfortable',
17 but it has the clear merit of being independently
18 determined and final. Indeed, before you joined I was
19 racking my brain, with others, about how we might find
20 a way of getting these cases or one of them to the
21 court. None of this [is] new, but I do think the trick
22 will be in the 'sell'. Anyway that's my view ..."

23 Was it explained to you that the view was irrelevant
24 because it wasn't capable of putting issues to bed in
25 the minds of some?

137

1 a very large volume of contemporaneous material that
2 explains your conduct and the conduct of those around,
3 you.

4 **A.** Mm, mm.

5 **Q.** Just a few topics, if I may. Firstly, can we look,
6 please, at the one of the first excursions into court
7 and the outcome of it, namely the strikeout application,
8 by looking at POL00103351, and look at the foot of the
9 page, please. We're now in October 2018. It's an email
10 to you, copied to others, from Jane MacLeod and she
11 says:

12 "I understand Tom Cooper has recommended you read
13 the judgment from the hearing last week."

14 It's attached:

15 "We received the decision on Monday evening and the
16 decision rejects our application for strikeout of the
17 significant parts of the evidence ['contained', I think
18 that should say] in the claimants' witness statements.

19 "The application was decided on case management
20 grounds for which the managing judge has considerable
21 discretion; applying that discretion, the managing judge
22 set a very high threshold for strikeout, and concluded
23 that we had not established to the necessary standard
24 that the claimants' evidence could never be relevant to
25 the case, given the number of Common Issues; the

139

1 **A.** All of these ruminations which is from -- is it Patrick
2 Bourke?

3 **Q.** Yes, this is --

4 **A.** Patrick Bourke -- you know, I had, as I've explained
5 twice -- the way it was represented to me was that
6 de Garr Robinson, who was the senior counsel, advised,
7 on strong advice, that the report should be discontinued
8 and repurposed. I can't ever remember receiving all of
9 the -- you know, the product of this kind of thought
10 piece or whatever, you know, justificatory type logic,
11 no.

12 **Q.** It might not just be a thought piece of justificatory
13 logic, it might be revelatory of the true reasons
14 operating on some people's minds for not continuing with
15 the Swift recommendations and they were instead badged
16 up to you as needing to be stopped because a silk had
17 said so in strong terms?

18 **A.** You know, it looks that way, doesn't it?

19 **Q.** Thank you very much. They're the only questions I'm
20 going to ask you about the Swift Review.

21 Can we turn to a separate topic, please the conduct
22 of the Group Litigation. You've addressed this in very
23 considerable detail in your witness statement and,
24 therefore, I'm not going to ask you about a lot of it
25 because you have exhibited to your witness statement

138

1 'considerable legal analysis' each will require; and
2 what our case on those issues is ... he confirmed that
3 he will apply properly the law on admissibility when it
4 comes to trial, and the November 2018 Common Issues
5 Trial will not rule on matters which concern Horizon or
6 whether Post Office actually 'breached' its obligations
7 to the claimants (matters to which most of the disputed
8 evidence goes and which will be dealt with in later
9 trials).

10 "As previously advised, this is consistent with the
11 managing judge's approach of wanting to give the
12 claimants their 'day in court' while applying the
13 orthodox legal position. That said, we lost the
14 application and can expect the claimants to be awarded
15 their costs when that question is dealt with on the
16 first day of the trial (estimated to be £120,000).

17 "In deciding the application, the managing judge was
18 critical about conduct of the case (see particularly
19 paragraphs 55-57), including intimating that we were not
20 acting go relatively and constructively in trying to
21 resolve this litigation (which criticism was levelled
22 equally between the parties); and that we had impugned
23 the court and its processes by making the application
24 for improper purposes. This response is extremely
25 disappointing given the approach that we have been

140

1 adopting, and his challenge as to the purpose which we
2 had applied for strike out is at odds with comments he
3 made during the various procedural hearings over the
4 past year. Nevertheless, we are refining our
5 preparation for trial -- including our reactive
6 communications plan -- in the context of the judge's
7 remarks."

8 Then back to page 1. You say:

9 "Thanks ... I've read the judgment, and the judge
10 does seem to be somewhat negative about our efforts to
11 take out elements of the evidence, even if he does
12 acknowledge that both sides have been uncooperative with
13 each other in the management of the case. My worry is
14 that some of his points at the end betray what looks
15 like an inherent dislike of our 'aggressive' approach to
16 the individual claimants as well as an 'aggressive'
17 approach to litigation, as well as a rap over the
18 knuckles regarding what the judge sees as using negative
19 PR as part of our argument. Interesting to know whether
20 this initial response from him suggests any change of
21 tack on our part."

22 So I think would it be fair to say you were
23 concerned about the judge's criticism of the Post
24 Office?
25 **A.** Yes. Was this -- just to be clear, was this the case
141

1 I was asking the question.

2 **Q.** So you say at the end:
3 "Interesting to know if this initial response from
4 him suggests any change of tack on our part."
5 Is that a question back to Jane MacLeod?
6 **A.** Yes. I think -- you know, and obviously -- without
7 wanting to sort of immediately prod and say, "Look it
8 looks like you're wrong", I'm inviting a comment.
9 **Q.** That leads me to the question: what role did you play,
10 therefore, in setting or amending the Post Office's
11 strategy in the Group Litigation?
12 **A.** So I think you'll see, I don't know if there's another
13 email chain subsequently, where the point is made to
14 Jane, and there are various responses around a change of
15 tack, et cetera, et cetera. Somewhere, I think.
16 **Q.** I think that's much later.
17 **A.** Is it? I'm sorry, there's so many documents it's hard
18 to --
19 **Q.** Yes.
20 **A.** So I'm not -- I mean, I can't tell you, if we don't have
21 any documents, exactly what the output of this was. At
22 this stage, you know, there's obviously some concern,
23 but -- and the point has been made. I'm not quite sure
24 what happened as a consequence of me inviting some kind
25 of response here.
143

1 management conference number 2? I'm just trying to, you
2 know, get the chronology. So we had case management
3 conference number 1, at which point he was quite
4 critical of both parties, who he said were being
5 uncooperative.

6 **Q.** I think that was in March '17?

7 **A.** And this is number 2, is it?

8 **Q.** I don't think it's CMC number 2. I think's a separate
9 strikeout application.

10 **A.** Okay, so progressively the judge, as I read things,
11 became more critical and what began as a sort of fairly
12 even-handed criticism of both parties, I think, by this
13 time he, you know, had started to become somewhat
14 critical of the Post Office, and that's why I suspect
15 I asked, you know, "So what do people think of this,
16 actually?"

17 **Q.** The words that were reported to you and which appear in
18 the judgment -- namely that the Post Office had made the
19 application for "improper purposes" -- are quite strong,
20 aren't they?

21 **A.** They are, and also, one of our people apparently -- this
22 is the PR reference -- I think said something like they
23 felt some of the additional evidence could potentially
24 damage the reputation. I can't remember what the -- so
25 I knew what the issues were and that was really why
142

1 **Q.** So back to the question of what role did you perform:
2 you weren't a member of the litigation steering
3 committee?

4 **A.** Well, by this time, I may be wrong, this is 2018 --

5 **Q.** October '18.

6 **A.** -- we had formed the Board subcommittee and so I'm not
7 quite sure whether this is in the context of the
8 executives or whether this is something that was going
9 through the Board committee. I would presume that this
10 was an exchange between myself and the executives.

11 **Q.** Is that because of those that are copied in on it?

12 **A.** I'm assuming that, yeah.

13 **Q.** Again, approaching the question from a different
14 perspective, who determined the Post Office's litigation
15 strategy?

16 **A.** So, at that point, we had a board subcommittee and the
17 arrangement was that the executives managed the
18 day-to-day elements of the litigation and were required
19 to escalate any significant decisions to the Board's
20 subcommittee.

21 **Q.** Did Government have any role in the strategy that the
22 Post Office took to the litigation?

23 **A.** Well, Tom Cooper was a member of the Board subcommittee,
24 and one of the key reasons he was a member of the Board
25 subcommittee was because he was the BEIS representative
144

1 on the Board.

2 **Q.** Can we turn forwards, then, to POL00103352, foot of the
3 page. Same day, 18 October, 10.30:

4 "Tim

5 "Have you seen the judgment from the other day?
6 It's worth a read."

7 Then further up the page, your reply, same day, at
8 2.00:

9 "I've now read it. Judge is critical of both
10 parties, but already sense he is not well disposed to
11 us -- the word 'aggressive' is used a couple of times in
12 connection with us, in relation to the inadmissible
13 evidence claim, and the treatment of [a subpostmaster].
14 The tone of his comments on the comments at the end, on
15 the Common Issues trial, and the purported objection on
16 our part for PR reasons, is definitely not helpful.
17 I've asked for an update on whether this ruling and its
18 tone, suggests any change of tack."

19 **A.** Yes, so that was the chain that I was referring to
20 earlier, where I think we picked up, you know, the
21 critical comments of the judge, and at that point was
22 asking, "So, guys, what are you going to do about this?"

23 **Q.** So what happened as a result? You've asked directly
24 Jane MacLeod, copied to Paula Vennells, does what has
25 happened on this occasion, resulting in the publication

145

1 committee as appropriate.

2 **Q.** We shouldn't see this kind of communication as the --
3 a means at which strategy was decided or carried into
4 effect?

5 **A.** Well, I suppose in a way you've got myself, Tom Cooper
6 and I'm not sure if, at some juncture, Ken McCall, who
7 was the -- another member of the committee -- would have
8 been involved in this, but, I mean, it at least is being
9 dealt with and two significant members of the committee
10 are aware of it.

11 **Q.** Thank you. Can we move forwards, please, to March 2019,
12 to look at the recusal application. Can we start by
13 looking at POL00023898, and look at page 2, please.
14 An email of 15 March 2019 from Jane MacLeod to you, Tom
15 Cooper and Alisdair Cameron. She says:

16 "As flagged on the Board call on Tuesday, we have
17 sought further advice on appeals and as to whether we
18 have grounds to request the judge to recuse himself on
19 the grounds of bias."

20 So I think the Board call previously was the Tuesday
21 of that week:

22 "We sought advice from Lord Neuberger who stepped
23 down last year as President of the Supreme Court (and
24 ... was the highest judge in the [United Kingdom]). We
25 sought his views as to whether the draft judgment

147

1 of this judgment, suggest a change of tack? UKGI have
2 sent the same judgment to you, saying it's
3 an interesting read. You've replied saying exactly what
4 you've done. What happened?

5 **A.** Yeah, so Tom and I were colleagues on this committee and
6 I don't know if someone can bring it up, but there is
7 a subsequent email chain and someone has spoken to Jane,
8 and I think it was Paula Vennells summarised a list of
9 outputs from that discussion, which -- I can't remember
10 which document is relevant to this. But there is one.

11 **Q.** I will endeavour to search for that whilst other people
12 ask you some questions because I don't have it at my
13 fingertips at the moment.

14 So is the answer, then, that the primary vehicle for
15 setting the strategy was the subcommittee?

16 **A.** Yes.

17 **Q.** But there were back channels of communication, such as
18 this one, in which members of the subcommittee
19 communicate?

20 **A.** Yes, I think the broad -- I can't remember the -- there
21 is a document somewhere with the terms of reference of
22 the subcommittee and, from memory, it makes fairly clear
23 that the management of the litigation is by the
24 subcommittee and executives, who manage the thing on
25 a day-to-day basis, need to escalate matters to the

146

1 demonstrated the following grounds for appeal:

2 "Whether the injured has correctly interpreted and
3 applied the law as to construction of a document or
4 application of a principle of law;

5 "Whether there are grounds to argue that findings
6 have been made as a result of serious procedural
7 irregularity (which goes to the admission of, and
8 reliance on, among other issues, inadmissible evidence);
9 and

10 "(most urgently) Whether Mr Justice Fraser
11 demonstrated grounds on which we could apply for him to
12 recuse himself.

13 "The test for recusal is 'whether the fair-minded
14 and informed observer, having considered the facts,
15 would conclude that there is a real possibility that the
16 [judge] was biased'.

17 "Attached is Lord Neuberger's preliminary [note]
18 ([the note he refers to is] put together by David
19 Cavender summarising the key extracts of the judgment
20 and trial transcript). As you will see in paragraph 5
21 [he] states that although he has only looked at the
22 issues very cursorily 'at least some of them raise quite
23 significant points on which the [Post Office] has
24 a reasonable case, and at least on the face of it, some
25 points on which the [Post Office] has a pretty strong

148

1 case'.
 2 "... he suggests that if we wish to rely on the
 3 ground of procedural unfairness at an appeal, then 'Post
 4 Office has little option but to seek to get the judge to
 5 recuse himself at this stage' and in paragraph 20 that
 6 if we fail to act promptly ... we 'risk being held to
 7 have waived [our] rights, or at least weakened our
 8 position on the recusal issue'."

9 There is a timetable.

10 The risks are:

11 "[If] The application is successful and the ...
 12 trial is adjourned ... we proceed with an appeal on the
 13 Common Issues Trial ... and a new judge is put in place
 14 ...

15 "The application is unsuccessful ... then it is
 16 likely that the judge is further antagonised, however he
 17 will be aware that the Common Issues trial is
 18 progressing which includes 'procedural unfairness'
 19 assertion. Possible impact in that scenario is that the
 20 judge is more cautious to as behaviours to (possibly)
 21 [Post Office's] benefit."

22 Over the page:

23 "The theoretical downside to a recusal application
 24 is that it fails and that Fraser remains the judge at
 25 Trial 3 which will require multiple findings of fact

149

1 many postmasters had been convicted and, in the same
 2 way, in a funny kind of way, this -- if I had had some
 3 meaningful statistics, I think if all of us had had some
 4 meaningful statistics about how often judges are
 5 recused, we might have looked at this in a slightly
 6 different way because I have a suspicion it isn't very
 7 often.

8 And I think one of the problems was that, you know,
 9 if you take advice out of the context of the frequency
 10 of the events you're trying to evaluate, you sometimes
 11 end up with a slightly distorted view of things. And
 12 so, you know, my gut feel -- and I'd had something to do
 13 with judges -- was this, you know -- I was a little bit
 14 uneasy. I have to say.

15 **Q.** What was the cause of your unease?

16 **A.** Simply the fact that, you know, it's quite a big deal to
 17 get a judge to accept that they had made a judgment that
 18 was wrong on technical grounds.

19 **Q.** Can we go forwards, please, to POL00103446, and scroll
 20 down to the foot of that page, please. Thank you.
 21 Slightly difficult to decode exactly what's going on but
 22 it's an email to you of 16 March, and Jane MacLeod says:

23 "Below is my high level summary of the call today."

24 If we go to the foot of that page there, where the
 25 summary begins:

151

1 which are more tricky to appeal.

2 "We should also not proceed with this course of
 3 action unless we are prepared to appeal a decision by
 4 him not to recuse himself.

5 "... I propose today to brief a further senior silk
 6 (probably Lord Grabiner) to act on the recusal
 7 application ...

8 "Next steps

9 "... this is clearly a Board decision and we would
 10 need to give the Board time to consider the options ..."

11 Then some practical arrangements given that Lord
 12 Neuberger was in Argentina.

13 Do you recall the issue of the recusal of Mr Justice
 14 Fraser being raised in this way?

15 **A.** Yes.

16 **Q.** What was your initial reaction, if you had one, to the
 17 suggestion that the Post Office should apply to a judge
 18 to recuse himself on the grounds that he was apparently
 19 biased?

20 **A.** If I'm honest, an element of unease. In a way, this
 21 is -- it's a bit analogous to what I mentioned at the
 22 outset of today, which is one of the things that would
 23 have held to frame this kind of decision and, indeed,
 24 the decision that were made at the beginning of this
 25 thing, would have been to know, for example, exactly how

150

1 "Participants: Kelly Tolhurst MP, Tom Cooper (UKGI),
 2 Gavin Lambert (BEIS), [you], Al Cameron, Jane MacLeod
 3 ..."

4 Then the text of Jane MacLeod's high level summary
 5 commences, and it goes over the page, and if we go to
 6 page 3, please, and if we look at the second bullet
 7 point down.

8 "TP [that's you] replied that we have a Board call
 9 on Monday evening at which we will discuss issues around
 10 the judge's bias and how that could impact subsequent
 11 trials. Although his [your] initial reaction is that
 12 this is not something the Board is likely to want to do,
 13 the Board must act in the best interests of the company
 14 so we need to consider that option seriously. If we are
 15 to make the application, we understand that it must be
 16 made urgently and should not be delayed", et cetera.

17 Firstly, why were you having a meeting or a call
 18 with Kelly Tolhurst MP about, amongst other things, the
 19 judge's recusal?

20 **A.** Well, by that time -- so just to give the background, so
 21 Tom Cooper was a member of the Post Office litigation
 22 subcommittee and, by that time, because not least the
 23 judgment in the Common Issues trial had been received,
 24 and it was so damning, by that time, I think the
 25 department was becoming worried, concerned and wanted

152

1 a higher level of involvement. And Kelly Tolhurst was
2 a relatively new -- because it was a fairly actively
3 fast resolving door over there -- she was the relatively
4 new Parliamentary Undersecretary of State at what was
5 called BEIS at that time, I think.

6 So the reason she was involved was that, you know,
7 Tom, I think, felt it was necessary to get the Minister
8 directly aware and involved in potential decisions that
9 were being made around the judge's recusal.

10 **Q.** What part did Government therefore play in deciding
11 whether to apply for the judge's recusal?

12 **A.** My assumption is -- and I've no means of telling from
13 this or indeed where I sit now -- is that Tom Cooper's
14 role was as the Department's representative on the Board
15 and this Board subcommittee. As it happens, he recused
16 himself from the decision because -- I can't remember,
17 there was, you know, some reason about the executive and
18 the judiciary, and stuff like that but, essentially, you
19 know, he would have been the conduit through which
20 I would have assumed we were getting a departmental
21 view.

22 **Q.** Why did Post Office need a departmental view on whether
23 to apply for a judge to recuse himself?

24 **A.** Well, I think this was simply an example of where
25 matters had got very serious. So you have to see things

153

1 **Q.** But just to stop there, that was because of your role as
2 Chair of HMCTS?

3 **A.** At HMCTS. But, put that to one side, I was there and
4 I would have been involved in that discussion and, you
5 know, I'm not trying to back out of this thing. So we
6 had advice from two sources. We had advice from
7 Neuberger and we had advice from Grabiner. Grabiner's
8 advice was pretty strong, actually. I think he said
9 something along the lines of we had a duty, almost, to
10 ask for the judge's recusal, and --

11 **Q.** Stopping there, what did you understand -- you're right,
12 he did say that -- what did you understand him to mean
13 by that the Post Office was under a duty?

14 **A.** I can't recall the detail exactly but the way the advice
15 was framed was that, you know, we kind of almost -- to
16 ensure the -- you know, the business of the
17 administration of the law required us, where we thought
18 something had been incorrectly managed, for whatever
19 reason, we needed to act upon that.

20 **Q.** Just stopping there, and can I put two potential
21 hypotheses to you in terms of the Post Office was under
22 a duty to apply: one could mean that the Post Office
23 was, as a matter of company law, its directors, it owed
24 a duty to make the application in discharge of its
25 duties to its shareholder?

155

1 in the context of the litigation producing an output
2 from the first trial that was a loss on virtually every
3 count, and our sole shareholder beginning to get
4 concerned, from all sorts of points of view, not least,
5 I imagine, they could see that there would be
6 a significant reputation, significant cost, all sorts of
7 things.

8 **Q.** Was it right that your initial reaction, as is recorded
9 here, is that this, ie applying to recuse the judge, was
10 not something that the Board was likely to want to do?

11 **A.** For the reasons I was trying to express earlier, I think
12 most of us -- I'm trying not to be overly complimentary,
13 Sir Wyn, most of us think that judges usually get it
14 right and, you know, have an inherent respect for the
15 judiciary. So it would have excited a certain amount of
16 unease in most people, I think, to suggest that, you
17 know, the judge had got it wrong.

18 **Q.** And was biased?

19 **A.** Or was -- and/or biased.

20 **Q.** What changed, to your understanding, from your unease at
21 making the application and your reporting that this was
22 something that the Board was not likely to want to do,
23 to the making of the application?

24 **A.** So the first point I should make, you know, is that
25 I also recused myself from the decision --

154

1 **A.** Mm.

2 **Q.** Alternatively, it could mean that, if you wished to win
3 this litigation in the final result, procedurally, you
4 are under an obligation to take this point now and not
5 wait until you appeal the substance. Can you recall
6 whether you formed a view as to in what sense you were
7 under a duty to make the application?

8 **A.** Honestly, I can't, at this distance. But I think --
9 I don't want to make too much of this duty thing.

10 I think we just got advice from two very, very senior
11 lawyers and felt, on balance, that advice should be
12 taken.

13 **Q.** So, in answer to my question, the thing that changed was
14 legal advice from two very senior lawyers, one of whom
15 said that the Post Office was under a duty to make the
16 application?

17 **A.** That's a fair description of what happened.

18 **Q.** Thank you very much.

19 The last topic, please. You told us earlier that
20 you were not aware of concerns being raised about the
21 Fujitsu employee, Gareth Jenkins, giving evidence in
22 court in Post Office prosecutions that may have been
23 false or incomplete --

24 **A.** Mm.

25 **Q.** -- until much later on?

156

1 A. Mm.
 2 Q. You couldn't remember when.
 3 A. Mm, mm.
 4 Q. Can I ask directly, then, that we look at POL00006357.
 5 Thank you.
 6 If we just go to the last page, which is page 14,
 7 and the foot of the page, we can see this is an advice
 8 of 15 July, written by Simon Clarke, in a firm of
 9 solicitors that the Post Office used, Cartwright King,
 10 to advise it on matters relating to the prosecution of
 11 subpostmasters.

12 A. Mm.
 13 Q. If we go back to page 1, it's advice on the use of
 14 expert evidence relating to the integrity of the Fujitsu
 15 Services Limited Horizon system.

16 If we just look at page 13, please, and the author
 17 says:

18 "What does all this mean? It means that
 19 [Mr Jenkins] has not complied with his duty to the
 20 court, the prosecution or the defence ...

21 "38. The reasons as to why [Mr] Jenkins failed to
 22 comply with his duty are beyond the scope of this
 23 review. The effects of that failure, however, must be
 24 considered ...

25 "[1] [Mr] Jenkins failed to disclose material known
 157

1 Lastly:
 2 "Where a convicted defendant or his lawyers consider
 3 that the failure to disclose the material reveals
 4 an arguable ground of appeal, he may seek leave of the
 5 Court of Appeal ..."

6 When were you first made aware of the existence of
 7 this advice by Simon Clarke concerning Gareth Jenkins?

8 A. Oh, well, I mean, probably in reading this in detail,
 9 when I actually got all of the -- I can't remember,
 10 I think it must have been in my bundle, but I mean
 11 certainly years after the event. I mean, one of the
 12 things that struck me was I don't think Swift was shown
 13 this.

14 Q. Correct.

15 A. Yeah, so, you know -- yeah. I mean, I can't tell you
 16 exactly when but, suffice to say, I would imagine,
 17 post-the trials, probably.

18 Q. By the trial, do you mean the Horizon Issues trial?

19 A. Or both -- I mean, you know, the point I am making,
 20 I think, is it -- I would have known about this at the
 21 point at which we were reviewing stuff after the
 22 litigation, yeah.

23 Q. So, too late for it to matter then?

24 A. Too late for it to matter then, yeah.

25 Q. What was your reaction on being provided with a copy of
 159

1 to him but which undermines his expert opinion ... in
 2 plain breach of his duty as an expert evidence.

3 "Accordingly [his] credibility as an expert witness
 4 is fatally undermined ...

5 "[3] ... in those current and ongoing cases where
 6 [he] has provided an expert witness statement, he should
 7 not be called upon to give that evidence ...

8 "[4] Notwithstanding that the failure is that of
 9 [Mr Jenkins] and, arguably, of Fujitsu ... this failure
 10 has a profound effect upon [Post Office] and [Post
 11 Office] prosecutions, not least because by reason of
 12 [Mr] Jenkins' failure, material which should have been
 13 disclosed to defendants was not disclosed, thereby
 14 placing [Post Office Limited] in breach of their duty as
 15 a prosecutor.

16 "[5] By reason of that failure to disclose, there
 17 are a number of now convicted defendants to whom the
 18 existence of bugs should have been disclosed but was
 19 not. Those defendants remain entitled to have
 20 disclosure of that material notwithstanding their now
 21 convicted status."

22 Penultimately:

23 "Further, there are also a number of current cases
 24 where there has been no disclosure where there ought to
 25 have been."
 158

1 the advice, or having it summarised to you?

2 A. Well, this is one of the things where, again, I think,
 3 when you've looked at a lot of the documents that we
 4 have reviewed today, it's hard not to draw the
 5 conclusion that decisions might have been different, had
 6 a lot of these things been known at the time and, you
 7 know, this whole terrible raft of events, I think, in
 8 part, is because, as problems build up over time, the
 9 wall against breaking them down gets higher and higher,
 10 and this was just part of the wall, and it didn't break
 11 down, really, until we got to the litigation, I suppose.

12 Q. Can we look, please, at POL00167395. These are minutes
 13 of a Board meeting held on 19 November 2020 by
 14 conference call, and you'll see that you are present.

15 It's a special meeting concerning the CCRC and
 16 you'll see that there's quite the cast list.

17 A. Mm.

18 Q. If we scroll down, and scroll still further, and then
 19 over the page. Second paragraph on that page:

20 "Brian Altman informed the Board that a layer of
 21 complication had been added to the court proceedings
 22 yesterday."

23 Then scrolling down, please. That paragraph refers
 24 to essentially the disclosure within the proceedings and
 25 outside the proceedings of the Clarke Advice, okay?
 160

1 A. Mm-hm, mm-hm.
 2 Q. That's the earliest that we can see that a reference was
 3 made to the Clarke Advice in any Board meeting.
 4 A. Mm-hm.
 5 Q. You wouldn't presumably be in a position to say, "No, we
 6 were told about it much earlier"?
 7 A. No.
 8 Q. I mean, lastly on this point, if we look at
 9 UKGI00017966, thank you, this is a reply of the Post
 10 Office to Tim McCormack, one of his searching Freedom of
 11 Information requests. He says:
 12 "Good to see the new spirit of openness in action
 13 yet again this morning with the publication of redacted
 14 copies of Board Minutes.
 15 "Could you therefore provide me with copies of all
 16 board minutes in which is mentioned the Clarke Advice or
 17 Clarke Review."
 18 So he's after that information.
 19 A. Yeah.
 20 Q. Then looking at the bottom paragraph there:
 21 "Post Office Limited has conducted reasonable and
 22 proportionate searches and has identified two sets of
 23 minutes in which the ... Clarke Advice was mentioned:
 24 the minutes of a meeting on 19 November", which is the
 25 one that I just took you to.

161

1 very serious problems which I and the Board were
 2 contending with. The context I give you on this is that
 3 I believe, in 2021, we had 60 Board meetings, something
 4 like that, to do with the fallout from this whole thing.

5 So whether anything happened as a consequence of
 6 this, I can't tell you for sure. What I can tell you is
 7 that the amount of time and work and effort that I and
 8 other Board members put into trying to essentially
 9 reconstitute this whole business from top to bottom
 10 might have allowed one of these things to sort of, you
 11 know, just evaporate without anything happening as
 12 a consequence.

13 So I can't tell you for sure what happened but I can
 14 tell you this was an incredibly, incredibly busy time.
 15 You have to remember, if you take an organisation and
 16 within the space of six months you find out that the
 17 whole basis on which your business has been conducted
 18 was wrong, you find out that your -- the whole basis of
 19 how you are somehow operating has to be changed. The
 20 amount of work to try and put things right, correctly
 21 so -- I mean, all of these things needed putting
 22 right -- but the workload was just immense and all time
 23 consuming.

24 And, whatever, you know, I can tell you the new CEO
 25 and the new team were making strenuous efforts to try to

163

1 A. Yeah.
 2 Q. "... and the minutes of a meeting on 4 February", which
 3 was obviously later in 2021.
 4 So it seems that the Post Office rather agree that
 5 the earliest mention of the Clarke Advice of July '13 to
 6 the Board was 19 November 2020.
 7 A. Mm-hm.
 8 Q. When it was revealed to the Board, the Clarke Advice,
 9 did anything happen as a result?
 10 A. That's -- I can't answer that question, I think,
 11 because --
 12 Q. I'm thinking --
 13 A. It's a very -- it's --
 14 Q. -- Mr Parker, something like "Well, hold on, I've been
 15 in position now" -- speaking from your perspective --
 16 "for five years or so" --
 17 A. And how come I didn't know about --
 18 Q. -- "I commissioned this guy called Jonathan Swift to
 19 look at things" --
 20 A. All right, I get the gist of your question. All right.
 21 So, look, this is 2020 or '21 or something like that.
 22 Q. Yes, November 2020, earliest mention.
 23 A. Again, I have to put in context some of my answers here.
 24 Previous context I have given you is the Post Office
 25 wasn't just about Horizon. There were a lot of other

162

1 put things right. So that's the context I would give,
 2 I suppose.

3 **MR BEER:** Tim Parker, thank you very much for answering my
 4 questions.

5 There are some questions from Core Participants.
 6 Could we take those, please, at 3.30, sir.

7 **SIR WYN WILLIAMS:** Yes.

8 **MR BEER:** Thank you very much, sir.

9 (3.18 pm)

(A short break)

11 (3.30 pm)

12 **MR BEER:** Good afternoon, sir, can you see and hear us?

13 **SIR WYN WILLIAMS:** Yes, I can. Thank you.

14 **MR BEER:** I'll just wait for the room to settle down
 15 a little.

16 **SIR WYN WILLIAMS:** Mm-hm.

17 **MR BEER:** Sir, the questions are, to start with, from
 18 Mr Henry up to 30 minutes; Mr Stein up to 10 minutes,
 19 and then Ms Patrick, up to 10 minutes.

20 **SIR WYN WILLIAMS:** All right, thank you.

Questioned by MR HENRY

22 **MR HENRY:** Mr Parker, together with Ms Page, I represent
 23 a cohort of Core Participants, including Seema Misra,
 24 and Mrs Oyeteju Adedayo. I want to start off with some
 25 general questions, if I may.

164

1 The first is the Sir Anthony Hooper argument. Did
 2 it ever occur to you that the SPMs who ended up being
 3 prosecuted or milked for shortfalls were hardworking
 4 people trying their best to put food on the table for
 5 their families in their own self-reliant way and
 6 therefore why would they resort to stealing from their
 7 own businesses?
 8 **A.** I think the way you put the question, there is -- with
 9 hindsight, it would appear that -- and this was the
 10 scale point I was trying to make earlier, which is that,
 11 if I had seen, I think, at the outset, how many people
 12 had been convicted and how many people had been
 13 terminated or had an employment issue because of
 14 apparent shortfalls, I think the scale of the problem
 15 would have been apparent. And I think part of the lack
 16 of response, or immediate response, partly came from the
 17 apparent scale, if you like, of how many people there
 18 were relative to the population of subpostmasters. But
 19 you're absolutely right, I mean, you know, when do you
 20 start to question whether people are honest or not?
 21 How many people do you need in a population before
 22 you think, well, can't be the case they were all crooks,
 23 or whatever?
 24 **Q.** Well, I'm going to come to that and, fortuitously, that
 25 was my second point because, when notifying the

165

1 done and we did all of that, the way the problem
 2 appeared to me was that there were 130 people, I think,
 3 going through mediation or 136, and there were 23 cases
 4 that were going through the CCRC.
 5 What I was trying to say earlier was that I actually
 6 didn't become aware of just how many of these people had
 7 been convicted until quite late in the day and you might
 8 say, well, why didn't you ask? And that is the point
 9 I was trying to make. With hindsight, we could, and
 10 perhaps this question should have been asked: that
 11 I know 23 people are going through the CCRC but can you
 12 tell me, please, how many people have been convicted
 13 over the last 15 years?
 14 And that, you know, might have precipitated
 15 a totally different response to this thing because, as
 16 I was trying to explain earlier as well, you can look at
 17 it through the lens of was the computer system reliable,
 18 or you could look it through the lens of how come so
 19 many people have been convicted, and how does that
 20 compare with the average for people being convicted in
 21 a retail business, for example, which is one of the
 22 questions I ended up asking.
 23 So I know it's an unsatisfactory response to you and
 24 your clients but, if this thing ever happened again and,
 25 you know, the issue was some people have been convicted,

167

1 Government of the liability regarding convicted
 2 subpostmasters -- so not dealing with civil, but purely
 3 criminal -- in your letter to the Secretary of State,
 4 you mention that 959 cases had been identified in which
 5 Horizon evidence had been used to secure a conviction.
 6 Do you remember that letter?
 7 **A.** Well, when was that written, please?
 8 **Q.** Well, we'll put it up on the screen. It's POL00031104,
 9 and you can see it's 29 April 2020.
 10 **A.** Yeah.
 11 **Q.** If we scroll down -- I can never get it right either,
 12 whether it's down or up -- but you'll see that there is
 13 a reference to 959 cases, it's the penultimate line on
 14 the screen.
 15 **A.** Yeah.
 16 **Q.** So I am going to describe it as the epidemic of theft
 17 and false accounting. Do I take it from your answer,
 18 your previous answer, that you never questioned the
 19 conventional wisdom that this huge portion of
 20 subpostmasters was dishonest, and that this
 21 statistically significant number of allegedly dishonesty
 22 subpostmasters did not make sense?
 23 **A.** Mm, the point I was trying to make earlier, and maybe
 24 I didn't make it clearly enough, was that when we --
 25 when I turned up and I asked for the Swift Report to be

166

1 one of the first questions to ask is, well, out of
 2 a population of how many, and how many other people have
 3 been convicted who aren't complaining, or aren't going
 4 through mediation?
 5 **Q.** So do I take it, again, that that work, that statistical
 6 analysis, came far too late?
 7 **A.** I'd have to agree with you on that.
 8 **Q.** I want to move on to a different subject and
 9 I appreciate that you were very much, as it appears,
 10 reliant on experts but the recusal decision to unseat
 11 Mr Justice Fraser, did you, notwithstanding the advice
 12 you received, take into account or recognise the impact
 13 that would have had on the subpostmasters' ability to
 14 secure an outcome in their favour? In other words, did
 15 you reflect that, if you had been successful, that would
 16 have killed the claim stone dead?
 17 **A.** So I think one of the paradox -- well, it's not
 18 a paradox, exactly, but, as I said at some point today,
 19 it always seemed to me that, had this been managed in
 20 a more cooperative manner, the civil proceedings, it
 21 could have, and perhaps should have, ended up with
 22 a judge-determined set of decisions around the contract
 23 and the reliability of Horizon. Of course, what
 24 happened was it was an adversarial combat and each side
 25 was trying to win, and the recusal was one decision that

168

1 could have stopped your client's case dead, I'm sure
 2 there were other things that, had they lost, would have
 3 ended up with a termination to the claim, for example,
 4 you know, if the judge had decided in the Common Issues
 5 trial substantially not to change the agency
 6 arrangement, that might have changed things as well. So
 7 my take on it is you're right, you know, had that -- had
 8 the recusal thing been successful, it could have stopped
 9 the case dead. I mean, I -- again, it must seem,
 10 perhaps, somewhat naive in retrospect but I -- my
 11 intention, and I had hoped, with these proceedings, that
 12 we would fight, you know, a sort of fair battle, and
 13 I think the -- one of the issues was the legal teams got
 14 into a sort of "we want to win" litigation, without --
 15 at virtually any cost.

16 And we got into a situation where people were
 17 doubling down and the recusal thing, to me, was
 18 a doubling down thing in retrospect. So, you know, for
 19 me, this is one of the most unsatisfactory aspects of
 20 the whole GLO.

21 **Q.** Do I take it that you felt that you had, as Chair, lost
 22 control of the litigation because, obviously, these
 23 things were being done ostensibly, shorthand, in your
 24 name but you appear to, by your answers, suggest that
 25 the lawyers had got out of control and that they doubled

169

1 because, today, I was toying with making an opening
 2 statement: stand up and say I'm deeply, deeply sorry, as
 3 many people have done. And there ensued a discussion
 4 with people, should I do this, because, you know,
 5 I would like to say sorry. And the response I got was
 6 that, well, you could do this, but actually, you know,
 7 people have got tired of that and it all rings a bit
 8 hollow and you probably are just going to annoy people
 9 more than really give them any sense of your real desire
 10 to say sorry.

11 And I'm afraid, in these circumstances, it's very
 12 hard to either prove that your sorrow and apology is
 13 genuine, it's hard to find language which, if you
 14 attempt to express it in the extreme, just sounds as if
 15 you're being hyperbolic and simply trying to get effect.
 16 So there is no satisfactory answer to this. There is no
 17 real way to say sorry in a convincing way because the
 18 people who have been affected just feel the damage has
 19 been done, and you're scrambling to sort of fill a small
 20 gap in that sort of failure to accommodate. So I don't
 21 think a good letter could have been written. I don't
 22 think any letter would prove to be satisfactory. And
 23 it's not easy, when you've got a lot of people who are
 24 involved.

25 So I know that's an unsatisfactory answer, but I'm

171

1 down and it had been adversarial and that you had,
 2 together with your colleagues, nothing to do with it?
 3 **A.** So, look, Mr Henry, it's not my intention to release
 4 myself from responsibility for these events. When
 5 you're the Chair, you, you know, the buck stops with me.
 6 So for me to try to characterise this as "Oh, it's all
 7 down to the lawyers and its nothing to do with us",
 8 that's certainly not my intention.

9 I think what I'm trying to highlight is, in the
 10 balance between the client and the lawyers, sometimes
 11 the shift goes too much in one direction and, instead of
 12 being, you know, the dog, it's the tail that starts to
 13 wag the dog, a bit. And I think the tail was wagging
 14 the dog a bit when we got to this. The recusal thing,
 15 as I said, I think I had misgivings about it at the time
 16 and it's -- again, I tried to make the point. I don't
 17 know how many just are recused but I imagine it isn't
 18 very many.

19 **Q.** Now, Mr Parker, moving on again to a separate topic, and
 20 I assure you that there is some purpose to it, when you
 21 sent out letters of apology subsequent to the Horizon
 22 Issues judgment, reflecting on this now, Mr Parker, was
 23 that performative or was that a genuine expression of
 24 contrition?

25 **A.** So, the subject of apologies. It is quite interesting

170

1 trying to express the reality of the situation.

2 **Q.** When you signed those letters, though, did you remain of
 3 the view, even after the Horizon Issues judgment, that
 4 the subpostmasters who had been prosecuted or pursued in
 5 the civil forum were guilty/liable? I mean, I'm trying
 6 to ask you to reflect on how hard it was to let go of
 7 the idea that the subpostmasters who had challenged and
 8 who had taken on the Post Office weren't at it?

9 **A.** I see the point to your question and my view is that,
 10 once we had reached the end of the trials, the game was
 11 up, as it were, and it was time to just, you know --
 12 I've tried, you know, when you get a business that is so
 13 upside down in terms of its structure and its
 14 relationships, I can see why you're asking the question
 15 but, from my standpoint, you know, I felt the game --
 16 you know, we just needed to change completely and, with
 17 the new Chief Executive and the team, we have tried, or
 18 we did until I left in 2022.

19 **Q.** So you don't believe that a mindset of blame still
 20 persists? I know you left in 2022 but you don't believe
 21 that a mindset of blame will persist within the
 22 organisation?

23 **A.** I can't speak for an organisation. I can only speak for
 24 myself and I would say that Nick Read and his team have,
 25 at all levels, made a huge effort. Now, that isn't to

172

1 say that some of the people who were working at the time
2 of these events are still at the Post Office, because
3 it's impossible to run an organisation, just clear
4 everybody out, as I hope, you know, is obvious. But the
5 mindset has been completely changed and I would say,
6 when you have such a huge shift in culture to make, it's
7 never made overnight. I mean, this is -- you have to
8 appreciate it's one of those slightly irritating aspects
9 of these sorts of events, is that trying to put them
10 right is no easy matter. And it requires determination
11 at the top.

12 And believe me, after the trials, I and the rest of
13 my Board, and Nick and his team have done, I feel, as
14 much as they can. The one area that I simply cannot
15 speak for is money, because money unfortunately -- once
16 the fact that there was a huge liability at stake, the
17 money is no longer a matter for the Post Office, it's
18 a matter for the shareholder.

19 **Q.** I see. Well, I'm going to now go to a specific example
20 where I suggest, you see, the mindset hasn't changed.
21 Taking Mrs Adedayo's case, what is your view on the Post
22 Office's recent written submission to the Inquiry,
23 effectively branding her a criminal, despite her
24 conviction having been quashed? I mean, you may not be
25 aware of it but I can put it up on the screen, if you

173

1 **SIR WYN WILLIAMS:** Well, if it helps, Mr Henry, I think it's
2 fair enough.

3 **MR HENRY:** So be it, sir.

4 Can I go to time, please, now, and I've got, having
5 dealt with some general questions, some specific issues.
6 Throughout your tenure, you had many competing
7 obligations devouring your time and you wouldn't be
8 human if, from time to time, forgive the expression,
9 they were distracting you. You would agree?

10 **A.** Actually, I've got a slightly different view to that.
11 I would say one of the strengths of having multiple
12 appointments is that you have got exposure constantly to
13 what is going on in a range of different activities.
14 And that actually means that you are well acquainted
15 with the business world and other worlds, actually, in
16 what's going on. And so I would say -- and I've tried
17 to explain earlier that, you know, being an effective
18 chair is partly to do with time but it's also to do with
19 judgement, and I think one's judgements and one's
20 involvement are actually improved by having a range of
21 different things to do.

22 **Q.** That, curiously -- and I'm sure that you weren't
23 plagiarising it -- was Mr Leighton's similar explanation
24 for the competing demands. But you have said yourself
25 it wasn't just about Horizon. There was an awful lot of

175

1 like. But I quote:

2 "The Inquiry will be aware that this [that is
3 Mrs Adedayo's case] is the sole case study where the
4 Post Office does not accept that the conviction was
5 unsafe."

6 Do you unreservedly reject that victimisation?

7 **A.** First of all, we haven't got the letter yet and,
8 secondly, unless I have got all the facts at my
9 disposal, Mr Henry, I don't think you can expect me to,
10 you know, deliver a black and white response on this.
11 I'm no longer, obviously, at the Post Office, which
12 precludes me a little bit from knowing what all the
13 background is.

14 **Q.** Well, Mr Parker, her conviction was quashed and the Post
15 Office still brand her a criminal. I mean, surely can
16 you not reflect upon that and distance yourself from it
17 and repudiate it?

18 **A.** I think I'd love to be able to just say, yes, Mr Henry
19 it's absolutely right, your client -- you know, I'm
20 absolutely with you. Honestly, I haven't had the
21 background and I simply, much as I would love to sit
22 here right now and say yes, I would prefer to see the
23 background first before delivering an opinion. And
24 I hope anybody in my situation would see that's not
25 unreasonable.

174

1 stuff going on, awful lot of stuff going on in the
2 business, and what I'm trying to suggest to you is that,
3 to reduce your time at this critical stage before the
4 GLO, must ultimately be viewed as a serious error of
5 judgement. What do you say to that?

6 **A.** I say, actually, I gave -- and as far as I'm concerned,
7 Mr Henry, I gave all the time and attention that I could
8 and needed to at the Post Office and I think if you talk
9 to colleagues, look at the Board effectiveness reports,
10 just do a general trawl, go and talk to people at the
11 Post Office, you will find that I was well acquainted
12 with what was going on. I was always well briefed.
13 When I was in a meeting, I paid very close attention to
14 the facts that were under consideration. I chaired
15 meetings well. So, no, I don't accept that assertion,
16 actually.

17 **Q.** I'm going to deal with this very quickly, Mr Parker, but
18 you are familiar with -- and you have seen, of course,
19 in the pack that was sent to you -- a number of emails
20 from Mr Tim McCormack?

21 **A.** Mm.

22 **Q.** What I'm suggesting to you is that, because of the
23 enormous burden on your shoulder, not just simply from
24 the Post Office but other competing demands, this
25 affected your ability to grip it personally and get

176

1 involved in what he was saying in a meaningful way, and
 2 so, therefore, you were channelling his requests onto
 3 other people who were not serving your interests. In
 4 fact, they were delaying, denying and stonewalling
 5 Mr McCormack. Now, would you like me to deal with the
 6 emails in detail or --

7 **A.** Yeah. I understand because I've read the emails --

8 **Q.** You've read the emails?

9 **A.** -- and I understand the point you're making. And I've
 10 tried to explain earlier that, when I joined the Post
 11 Office, and bearing in mind most of these emails were
 12 probably around April 2016 and July, or whatever,
 13 I think that's right, I assumed -- perhaps, with
 14 hindsight, incorrectly -- that the people who were
 15 advising me were honest, you know, were competent,
 16 et cetera. And in virtually every other company I have
 17 been in, when I get a sort of email or letter that which
 18 comes in, which is essentially about a legal matter and
 19 says, you know, in capital letters "I will say, you
 20 know, what's going on, and take it away and give me some
 21 background".

22 And I understand the point you're making but I can
 23 honestly tell you, Mr Henry, that whilst, you know, it
 24 might appear that we should have grappled with Tim's
 25 points and really concentrated on them, and it's very

177

1 Office was being prepared -- I'm going to call it
 2 a grooming pack, prepared by Mark Davies -- that they
 3 were trying to get you on side and that, notwithstanding
 4 your genuine desire to be independent, notwithstanding
 5 the fact that you had no axe to grind, that gradually
 6 you were compromised and, to use the analogy of the
 7 wall, you became immured in prejudice; what do you say:
 8 the institutional prejudice of those people that you
 9 relied upon and trusted who surrounded you?

10 **A.** What I will say is this: behind a set of events that we
 11 have been discussing today are a complex mixture of
 12 interactions between people. Some self-consciously
 13 driven in a particular direction, others not. Others
 14 just being part of it, and so, whilst your
 15 characterisation, I think, probably has some truth to
 16 it, matters are far more complicated than that, and
 17 I would say, in some respects, yes, the wool might have
 18 been pulled over the eyes and, in other respects not,
 19 sometimes happened, and sometimes didn't. But there
 20 isn't -- you know, it is very unsatisfactory but it's
 21 like, you know, here's a set of wrongs, and we put them
 22 right, and how did the wrongs happen and, exactly, you
 23 know, where are the root causes?

24 And the root causes of this thing of course, at the
 25 end of the day, probably reside in the software. The

179

1 unsatisfactory, looking back, to see that it was handed
 2 over to a bunch of people, that we -- you know, arguably
 3 weren't going to handle it well -- those were the
 4 circumstances at the time.

5 I'm not trying to get out of responsibility here.

6 Some mistakes in that respect were made but I honestly
 7 wouldn't say that was a function of me not having enough
 8 time, as such.

9 **Q.** If it wasn't a function of you not having enough time
 10 then why would you not wish to go to the ends of the
 11 earth to establish whether or not an innocent woman had
 12 been imprisoned?

13 **A.** Because this was an individual case, which I think was
 14 going through the CCRC. I can't quite remember the
 15 context and, actually, I have tried to grapple with this
 16 thing, largely through the collection of issues that
 17 were brought together, and you're right; I mean, perhaps
 18 had one rushed after the Misra case, there might have
 19 been some progress. I can't honestly tell you. But if
 20 what you're implying is that somehow, you know, because
 21 I didn't deal with this thing, we didn't really do
 22 anything, didn't really care about this, didn't try to
 23 resolve it, I don't think that's really fair.

24 **Q.** What I'm trying to suggest, you've talked about the wall
 25 being built, we've seen how your reception into the Post

178

1 root causes of the problems we talked about today reside
 2 in the process of investigation.

3 The individuals -- and this is the point I was
 4 trying to make, you know -- a lot of the problems that
 5 we have looked at happened between 2000 and 2010, quite
 6 historic, and trying to overcome history in a business,
 7 when history is so damaging, is a tough thing to do.

8 So --

9 **Q.** All the more reason, therefore, for people who feared
 10 what impact that could have on the GLO to keep it
 11 battened down, to keep it hermetically sealed so that
 12 none of that would escape; do you see?

13 **A.** I do, I understand the point you're making and I tried
 14 to express this earlier, which is it's got a slightly
 15 unsatisfactory tinge to it because, of course, it
 16 implied that Sir Alan and the JFSA team had to spend
 17 money and had to get support to mount the GLO. But the
 18 GLO, although one might have a lot of aspects of
 19 dissatisfaction about the way it was run, actually did
 20 end up with a judge making determinations which will
 21 change the Post Office forever and, actually, set up
 22 a situation in which your clients, in time, should be
 23 properly compensated because the -- there's been
 24 an absolute clarity in terms of what -- which -- you
 25 know, what was responsible for what.

180

1 **Q.** Now, Mr Parker, I have to be brief, and I don't want to
 2 be unfair to you but I've only got couple of minutes
 3 left, so I just want to ask you if you feel that the
 4 answer you gave to Mr Beer about this really had to be
 5 resolved, as it were, adversarially was somewhat
 6 fatalistic and that more could have been done to strive
 7 to see the other side and to strive for settlement,
 8 without having to enter into the quagmire of litigation.

9 **A.** Yeah. I mean, look, there's no satisfactory answer to
 10 this. I played out -- so if there had been an early
 11 settlement, I could easily imagine a situation in which
 12 your clients will be worse off because, instead of
 13 waiting until the end when it was absolutely determined
 14 by the judge that Legacy Horizon was not robust and, you
 15 know, Horizon Online wasn't robust, you could have ended
 16 up in a situation where, mm, computer system quite
 17 robust. This is the point I was trying to make earlier,
 18 where I played out -- so the post -- I know -- I'm not
 19 trying to escape, you know, responsibility but if we'd
 20 sort of said, "Well, you know, we think we've got
 21 a problem with the computer system, it's not reliable",
 22 the moment you start to get to a "there could be
 23 miscarriages of justice", "there could be a huge
 24 liability here", then the question starts being asked:
 25 well, what's involved?

181

1 have been attempting to deliberately somehow undermine
 2 a situation that had been, you know, effectively
 3 determined as a result of the trials. I just don't know
 4 where that comes from, honestly.

5 **Q.** Finally, do you recognise the suggestion that the Board
 6 looks at lawyers purely from this perspective: they see
 7 lawyers -- this is Rodric Williams, speaking on behalf
 8 of the Board -- as interchangeable tools for optics,
 9 legal advices, polluted product for the Post Office
 10 because of the High Court litigation; is there any
 11 suggestion that you and your colleagues did see lawyers
 12 as marionettes?

13 **A.** Sorry, what's the point you're trying to make?

14 **Q.** Well, the Board is reported to have told the lawyers not
 15 to advise on safety and Rodric Williams goes on to say
 16 "the Board sees lawyers as interchangeable and tools for
 17 optics". You said that you didn't see lawyers as
 18 marionettes but, I mean, this suggests that perhaps if
 19 this note is a fair reflection of your point of view,
 20 that you did?

21 **A.** Is this a Rodric Williams note, is it? I don't think
 22 Rodric really reflects an awful lot of certainly what
 23 I think or what the Board thinks.

24 **MR HENRY:** Okay. I think I've run out of time so I'm going
 25 to stop there.

183

1 **Q.** Final question, please, and I have to compress two
 2 documents, but there are two documents noted by Peters &
 3 Peters, it would seem, but involving number of lawyers,
 4 and one reference is POL00337435, it's dated 24 January
 5 2020, and so that's long after the Horizon Issues
 6 judgment. You are not present, Mr Parker, but you and
 7 Mr Cooper, it is said, wanted to take pot shots at Seema
 8 Misra. Do you have anything to say about that? Do you
 9 recall any research that have been done on what
 10 claimants, convicted claimants, have said in open source
 11 material to try and trawl to see if they had made
 12 previous inconsistent statements so that their
 13 credibility, even after the Horizon Issues judgment but
 14 before the criminal appeal, could be impugned? Do you
 15 remember anything of that nature?

16 **A.** I don't and, funnily enough, this document appeared
 17 fairly late in my bundle. I did have a look at it, and
 18 it is apparently a sort of abbreviated description,
 19 isn't it, of a barristers' meeting, I think, yes.

20 **Q.** Yes.

21 **A.** Well, look, somebody writes "taking pot shots", I don't
 22 know what that means to you but it's a fairly colloquial
 23 sort of -- I don't know what they were trying to express
 24 but I'd love to have Tom Cooper in the room here but
 25 I can assure you, neither of us and -- you know, would

182

1 Thank you, sir.

2 **THE WITNESS:** Thank you.

3 **SIR WYN WILLIAMS:** Thank you, Mr Henry.

4 **Questioned by MR STEIN**

5 **MR STEIN:** Mr Parker, my name is Sam Stein. I ask questions
 6 on behalf of a large group of subpostmasters and
 7 mistresses and people that worked in Post Office
 8 branches.

9 You will recall, having dealings in at least 2019,
 10 with a Mr Swannell. At the time, he was the Chair of
 11 the Shareholder Executive and that was later renamed
 12 into UKGI, which is the UK Government Investments.
 13 Okay.

14 Now, when you get to the end of 2019, there were
 15 discussions that touched on the question of settlement;
 16 do you recall that?

17 **A.** Mm, mm.

18 **Q.** Okay. Now, help us please a little bit with this.
 19 Mr Swannell will be giving evidence next week, I think
 20 on Tuesday, and his recollection is of having had a word
 21 with you, sometime in June 2019, whereby you thought the
 22 estimate of the amount involved in the settlement might
 23 well be something in the order of 100 million.

24 **A.** Mm-hm.

25 **Q.** Now, contextually, we know that the settlement was in

184

1 the order of, essentially, 50 million, a bit over.
 2 **A.** Yeah, yeah.
 3 **Q.** Okay?
 4 **A.** Yeah.
 5 **Q.** Now that's quite a big difference?
 6 **A.** Yeah, mm.
 7 **Q.** But the 100 million, was that what you thought it was
 8 worth or was that what you were told this may well come
 9 to?
 10 **A.** Honestly, I'd like to see the papers because it's quite
 11 hard for me, 2019/20, 100 million, I'd love to be able
 12 to give you a definitive answer but I can't on that.
 13 **Q.** But do you have a recollection because it's only his
 14 statement where he refers to this. I'm not sure we have
 15 papers that refer to this. Do you have a recollection
 16 as to whether there was any particular barrier, as
 17 an example, to 100 million or --
 18 **A.** Well, okay --
 19 **Q.** -- that was being discussed?
 20 **A.** -- all I will say to you and, again, I'm not trying to
 21 escape responsibility, liability, or whatever, is that
 22 whatever discussions happened post-the litigation, the
 23 whole -- the money only comes from one source and,
 24 therefore, you know, whether the Post Office quotes the
 25 number or there's another number, ultimately, the
 185

1 are subsequently contradicted by someone else, so
 2 I can't give you a definitive answer to this, honestly.
 3 **Q.** But you're not saying no. What you're saying is you
 4 can't really remember; is that fair?
 5 **A.** That's exactly what I'm telling you, yeah.
 6 **Q.** Okay. I'm going to go, therefore, to a document you've
 7 looked at with Mr Beer a little earlier. Can we go to
 8 POL00174397, please. I'd like to go to page 2, once we
 9 get to the document. So do you recall, quite early on
 10 in the questions being asked by Mr Beer, that he was
 11 discussing with you this note, which is a note that was
 12 meant to have emanated, as you understood it, from Paula
 13 Vennells, okay?
 14 **A.** Mm, mm.
 15 **Q.** It's a briefing document of some type, setting out some
 16 of the concerns at that time. Now, you've said
 17 repeatedly a word you use is context, so let's
 18 understand the context of things. So the context of
 19 this note is you come into a business that's overall in
 20 crisis, you agree?
 21 **A.** Yes.
 22 **Q.** Yes. Fundamentally, this is a problem business, in
 23 terms of needing to be turned around, yes?
 24 **A.** Yes.
 25 **Q.** Okay. You've been chosen over another possible
 187

1 decision isn't going to be made really in the Post
 2 Office.
 3 **Q.** Right. So, essentially, you're saying, by that point --
 4 **A.** By that point.
 5 **Q.** -- it's for the Government, as the shareholder --
 6 **A.** The Post Office could not probably run, and I may be --
 7 maybe it can now but, certainly in my time there,
 8 I don't think it could have run as a standalone
 9 business. It needed constant support from the
 10 Government.
 11 **Q.** All right.
 12 **A.** And, therefore, any additional cash requirements was
 13 always going to be an incremental Government decision,
 14 one way or another.
 15 **Q.** So before I move on to another topic, your recollection
 16 of the figures in relation to the settlement was (1) the
 17 money was always going to have to come from Government.
 18 Yes; is that right?
 19 **A.** Ultimately, yes.
 20 **Q.** And, secondly, Mr Swannell's recollection of discussions
 21 around 100 million and, in fact, it being considerably
 22 less than that, clearly demonstrates that there had been
 23 discussions at potentially quite a bit of a larger
 24 figure at some point?
 25 **A.** Look, I don't want you to put words into my mouth that
 186

1 candidate as being the right individual to have a go at
 2 doing that, yes --
 3 **A.** Yes.
 4 **Q.** -- and you wanted to find out more about what's going
 5 on?
 6 **A.** Yes.
 7 **Q.** Again, you're saying yes, you're agreeing; is that
 8 right?
 9 **A.** Yes. I'm just wondering where this is going.
 10 **Q.** Well, let's see where it's going in a moment.
 11 **A.** Yeah.
 12 **Q.** We know also from your evidence that you said that the
 13 whole basis of the business and the way it was being
 14 conducted, you've referred to that being questioned in
 15 the litigation, because it's about the Horizon system.
 16 **A.** Yes.
 17 **Q.** Okay? So when you came in to the Post Office, in the
 18 role that you took over, you must have realised quite
 19 rapidly that questions regarding the Horizon system
 20 integrity were also questions that were threatening the
 21 whole business; is that fair?
 22 **A.** Looking at this, as I've tried to explain, in scale
 23 terms, it didn't look that big, in relation to the
 24 population of subpostmasters, the number of people who
 25 were complaining, the number of people who were
 188

1 convicted. And so -- and most of these issues were to
2 do, obviously, with what you would call historic
3 Horizon. So, from my perspective, you know, we had
4 a set of issues that were people who'd had historic
5 problems with Horizon, and then there was Horizon as
6 an EPOS system, which operated post offices,
7 effectively.

8 And the two things were slightly, you know, one is
9 sort of business as usual, the other is a whole set of
10 issues that people had had with the system historically.

11 So this -- as I tried to explain earlier, this was
12 one of a number of problems.

13 **Q.** Right. Now, you've said that a number of times. That's
14 your context point: number of other problems dealing
15 with the business. But this is about the Horizon
16 system. It's questioning the integrity of the system;
17 you agree with that?

18 **A.** A component of it is, yes.

19 **Q.** Let's have a look at how serious this was, then. We can
20 go perhaps to the bottom of page 2, if we may, please,
21 I think we're there already, and fourth paragraph from
22 the bottom. Just go up a little bit. Yeah. We see the
23 bottom. That's it.

24 **A.** Yes.

25 **Q.** Right. We can see that the references here are
189

1 **A.** Yes.

2 **Q.** Now, accepting your point, which is that, in your mind,
3 you've got the problem which is you think may well be
4 largely historical, may be an older part of the system.

5 **A.** Mm.

6 **Q.** Okay, but this is in fact actually questioning the
7 integrity, not only of the Horizon system but also of
8 management --

9 **A.** Yeah, yeah.

10 **Q.** -- at the very time you're coming into it?

11 **A.** Yeah.

12 **Q.** So it's raising the very question that Mr Beer was
13 talking about with you, which is, well, hang on are the
14 people around you people that you can trust, right?

15 **A.** Um --

16 **Q.** Serious allegations.

17 **A.** Yeah.

18 **Q.** In fact, allegations that, if true, would be the death
19 knell of the business that's already in crisis.

20 **A.** Well, I'm not sure I would go that far but you're right
21 to highlight that. Yes.

22 **Q.** Okay, well, let me highlight then and see if I can be
23 right about something else. Page 1, third paragraph
24 down, please. Now, I use the term paragraph, the three
25 main paragraphs from the top under "Note for Tim
191

1 obviously to the JFSA complaint --

2 **A.** Yeah, yeah.

3 **Q.** -- we see the BBC Panorama programme --

4 **A.** Yeah.

5 **Q.** -- and we see references to MPs that are also engaged.

6 **A.** Yeah.

7 **Q.** If we scroll a bit further down, please -- my fault,
8 let's go up again.

9 Fourth paragraph from the bottom. Okay, the one
10 that starts:

11 "We have been robust in rejecting the serious
12 allegations made in Parliament ..."

13 Is that right?

14 **A.** Yeah, yeah.

15 **Q.** "... made in Parliament and media, particularly in
16 recent months."

17 Then it goes on to talk about the issues that
18 concern:

19 "... the campaign's allegations have grown to
20 include suggestions of wrongdoing by senior management
21 ..."

22 **A.** Yeah.

23 **Q.** "... bullying, deliberate cover-up and abuse of
24 prosecutor powers."

25 Now, these are serious allegations.
190

1 Parker", okay? So it says this:

2 "The Horizon system deals with six million
3 transactions every day and has been used by almost
4 500,000 people since it was introduced. It is currently
5 used by 78,000 people working in Post Office branches,
6 is independently audited and meets or [excels] standard
7 industry accreditations."

8 Let's take that apart. Did you receive the
9 independent audit of the Horizon system at this time?

10 **A.** No.

11 **Q.** Did you ask for the independent audit of the Horizon
12 system at this time?

13 **A.** Which independent audit system are you referring to?

14 **Q.** Well, go back to the third paragraph from the top, the
15 one I read out:

16 "The Horizon system deals with six million
17 transactions every day and has been used by almost
18 500,000 people since it was introduced. It is currently
19 used by 78,000 people working in post office branches,
20 is independently audited ..."

21 So stopping there for the moment. Did you see the
22 independent audit at this time?

23 **A.** So, essentially, I --

24 **Q.** It's a bit of a "yes" or a "no" question.

25 **A.** No, can I just finish, please? I think I'm entitled to
192

1 that. I understand the question that you're asking.
 2 Essentially, I didn't ask for the independent audit.
 3 This was something, obviously, that's been put into the
 4 brief. Now, I'm not quite sure, can you just explain to
 5 me where you're going? Where --
 6 **Q.** I'm asking the simple question, I suspect answer is
 7 either yes or no. It looks like it's no. Did you see
 8 the independent audit? The answer appears to be no, you
 9 didn't; is that fair?
 10 **A.** Well, you know, if somebody says something is
 11 independently audited, that can mean a number of
 12 different things. It can mean somebody has gone in and
 13 looked at it or it can mean that there's a -- I don't
 14 know, but if you're asking had I got the independent
 15 audit? No.
 16 **Q.** Did you ask for it?
 17 **A.** I don't think I could have done.
 18 **Q.** All right, why couldn't you have done, Mr Parker?
 19 **A.** Do you know --
 20 **Q.** Is that you saying you didn't have the power to --
 21 **A.** No.
 22 **Q.** -- or are you saying you just didn't?
 23 **A.** No, this was a brief that I received, and we've looked
 24 at this Sparrow brief and it's -- you know, earlier.
 25 And this is all about -- so what actions could have been
 193

1 whether that means you didn't have the power to do it or
 2 whether you just didn't do it, which?
 3 **A.** I think I could have had the power, in theory,
 4 I suppose, to do many things.
 5 **Q.** Right.
 6 **A.** And we, you know -- as I said, I didn't ask for the
 7 audit and it -- you know, I don't know what this was
 8 referring to. We moved on to Swift.
 9 **Q.** Okay. Now, it then goes on to say in this paragraph:
 10 "... and meets or exceeds standard industry
 11 accreditations."
 12 Did you ask for those?
 13 **A.** I can't tell you right now because, you know, this is
 14 a long time ago.
 15 **Q.** Do you recall seeing the standard industry
 16 accreditations for the Horizon system?
 17 **A.** I don't think anybody plonked them on my desk, no. But
 18 I'm not entirely sure. I don't think so.
 19 **Q.** Two paragraphs down, "We commissioned", it starts; do
 20 you see that one there? Further down, "We
 21 commissioned" -- thank you very much -- it's got
 22 a little yellow dash to the left of it:
 23 "We commissioned [past tense] a review by
 24 independent forensic accountants ..."
 25 Okay? Then it goes on:
 195

1 taken that might have landed us in a different
 2 direction? And maybe you're right. Maybe there was
 3 an audit. We could have asked for it, I could have
 4 asked for it and it would have said this is okay, and --
 5 or, you know, it would have been something that was
 6 inadequate. I'm not entirely sure. And, with
 7 hindsight, there are many things that we could have
 8 done.
 9 Swift, which we discussed extensively, whilst not
 10 being perhaps brilliant and perhaps a bull's-eye and
 11 perhaps spot on, covered off a lot of the bases and, if
 12 the question you're asking is, you know, is there
 13 something that definitively could have been done that
 14 would have pushed us in another direction? I'm not
 15 entirely sure.
 16 **Q.** Mr Parker, I'm asking about your decision making. I'm
 17 asking about your responsibilities.
 18 **A.** Yes.
 19 **Q.** I'm asking questions that go to whether and to what
 20 degree that you have made mistakes; do you understand
 21 that?
 22 **A.** I entirely understand that.
 23 **Q.** So your answer to my question to the independent audit
 24 was this, "I don't think I could have done". Now, I'm
 25 trying to find out now, from my follow-on questions,
 194

1 "... to set up a scheme which, where appropriate,
 2 offered mediation", et cetera.
 3 All right? Now, reminding us of the timing of this,
 4 this is at 2.15, at the time that you're engaged in
 5 dealing with matters, all right? We know that what this
 6 must appear to be is Second Sight, which is back to
 7 2013, so it says:
 8 "We commissioned a review by independent forensic
 9 accountants ..."
 10 Did you ask to see that?
 11 **A.** The Second Sight report, we saw as part of the whole
 12 setting up of the Swift Review.
 13 **Q.** Did you see it as part of this? Did you get this and
 14 say, "I need to see the independent forensic accountant
 15 review"?
 16 **A.** I can't tell you exactly when I saw it.
 17 **Q.** Right. So what we have established, in your evidence
 18 with Mr Beer, first of all, and obviously with me as
 19 well, what we have established is that you came in, you
 20 were given this briefing and then you decided that you
 21 needed to have somebody else look at these issues, and
 22 that was then Mr Swift --
 23 **A.** Yes.
 24 **Q.** -- QC, now KC?
 25 **A.** Yeah.
 196

1 **Q.** Okay, got it. Do you accept that what you should have
 2 done, have been more hands on, saying, "Let's have
 3 a look at this stuff myself, I want to see it on my
 4 desk, I want to talk to the IT people, maybe talk to
 5 Fujitsu"; do you accept that you could have gone more
 6 into this yourself?

7 **A.** I have tried to explain earlier, I think, that, whilst
 8 you might say the Swift Review was inadequate and we
 9 should have gone straight to the IT system and done
 10 an audit, that is one of a number of possibilities. And
 11 what I tried to do was to get somebody who could look at
 12 the range of issues and the Horizon system was one of
 13 them. So, you know, as -- if I had seen, I suppose --
 14 and I mentioned this earlier -- the scale of the thing,
 15 that might have been different but I responded to this,
 16 honestly, in the best way that I thought I could and
 17 I felt Swift was a pretty good response, initially.
 18 Now, we know, with hindsight, we go down a sort of
 19 Sparrow briefing, I can see your point.

20 **Q.** You see, one way to look at the difficulty with the
 21 amount of time that you were spending on this, is that
 22 you were part-time and your decisions were part baked.

23 **A.** Yes.

24 **Q.** Do you understand that, Mr Parker? You've said
 25 repeatedly that the time issues, this is the same amount

197

1 of matters it deals with and the number of users it has,
 2 will occasionally discover bugs, errors or glitches in
 3 the way that it works."

4 Then you continue the quote:
 5 "Some of those bugs may impact on the financial
 6 position of a branch, either positively or negatively.
 7 We do not understand POL or Fujitsu to suggest anything
 8 otherwise."

9 Now, Mr Parker, we're learning from the Swift Review
 10 that this system, the Horizon system, may in fact cause
 11 negative impacts on the financial position of a branch.
 12 Did you not think to yourself, "Hang on, that sounds
 13 remarkably like the people that had been making all that
 14 noise from the JFSA", and decide there and then to do
 15 something about it?

16 **A.** So Swift, I felt, covered off a range of issues and
 17 covered them off quite comprehensively, and I took away,
 18 perhaps wrongly, that Swift, whilst it wasn't a green
 19 light, was not a red light either, and what you've done
 20 today, I think, has sort of picked up on a number of
 21 points which, with hindsight, we might have gone after.
 22 And this is one of the frustrations and difficulties of
 23 looking at something like this, over a long period of
 24 time, with a great deal of complexity and, you know,
 25 I could reel off a bunch of other things I could have

199

1 of sort of time that you might spend with other
 2 businesses, that the role of the CEO is like that, that
 3 you have a direction, rather than necessarily getting
 4 down to the grips with the nitty-gritty all the time
 5 type role.

6 **A.** Mm, mm.

7 **Q.** But this isn't the National Trust, is it, Mr Parker?
 8 This is the Post Office, responsible for prosecuting its
 9 own staff members. Don't you think that more time
 10 should have been spent by you getting to grips with
 11 these very issues?

12 **A.** I don't accept that. I gave sufficient time and
 13 attention to the Post Office, I'm sorry.

14 **Q.** Our time is limited now myself, in relation to questions
 15 and I'm --

16 **SIR WYN WILLIAMS:** You've already taken double the
 17 allocation, Mr Stein, so one more question.

18 **MR STEIN:** Only one more minute. You say this in your
 19 statement, paragraph 59, this is in relation to the
 20 Swift Report or Review and you quote in your statement
 21 part of the Swift Review, where it says this, in
 22 relation to bugs -- so paragraph 59, page 27 of your own
 23 statement -- all right? Swift Review:
 24 "It seems to us entirely unremarkable that the
 25 Horizon system, which is enormous in terms of the range

198

1 done that would have ended up with probably a quicker
 2 situation.

3 But I come back to the point I made earlier, which
 4 is that the extent of the issues that we had arrived at
 5 meant that, no matter how unsatisfactory, the ultimate
 6 determination of the reliability of the computer system
 7 and the contractual position with subpostmasters has
 8 facilitated a long-term solution to this problem.

9 **SIR WYN WILLIAMS:** All right. Thank you.

10 **MR STEIN:** Thank you for your indulgence. No further
 11 questions.

12 **SIR WYN WILLIAMS:** That's fine.
 13 Ms Patrick?

14 **Questioned by MS PATRICK**

15 **MS PATRICK:** Thank you, sir.
 16 Mr Parker, my name is Angela Patrick. I represent
 17 a number of subpostmasters who were convicted, and have
 18 since had their convictions quashed, including
 19 Mrs Hamilton, who I'm sure you can see sitting beside
 20 me.

21 **A.** Yeah.

22 **Q.** You might be glad to hear that I only want to look at
 23 one issue. I want to turn back to the follow-up to the
 24 Swift Review and I actually only want to look at one
 25 example, and that's the advice of Mr Altman, then QC now

200

1 KC, produced on 26 July 2016 for the Post Office in
 2 response to the Swift Review.
 3 I want to start, just to look a little bit at what
 4 you say in your witness statement about that advice,
 5 just to refresh your memory. I'm not proposing to turn
 6 your witness statement up, in case you need me to
 7 refresh your memory. If you do, say so.
 8 **A.** Yeah.
 9 **Q.** In your witness statement, you say -- at paragraph 113,
 10 for those following along -- that it's likely you would
 11 have briefed in on that advice from Mr Altman --
 12 **A.** Mm.
 13 **Q.** -- but you can't recall now what you would have thought
 14 about it.
 15 **A.** Yeah.
 16 **Q.** Now, just to clarify, do you think you did see a copy of
 17 the advice or is it likely that you didn't?
 18 **A.** I mean, I'd like to be able to confirm to you one way or
 19 another, but I honestly can't.
 20 **Q.** No. But you recall that it's likely you would have been
 21 briefed?
 22 **A.** Yes, let's say -- let's work on that principle, if you
 23 want to take your point further.
 24 **Q.** It's not a principle. I'm going on your evidence from
 25 your witness statement, Mr Parker --
 201

1 **Q.** You can't, I assume, recall whether the briefing would
 2 have covered whether the review, the advice, had been
 3 narrowed to report only in eight cases?
 4 **A.** I can't.
 5 **Q.** If you had known and you'd been told at that time,
 6 having read the Swift Review and what he'd recommended,
 7 that you go back and look at all the cases, if you'd
 8 read at the time that he was only going to look at eight
 9 cases, in fact he could only analyse three, would that
 10 have caused you any concern?
 11 **A.** Well, it's funny you should mention that because I read
 12 through the documents again and I was struck a little
 13 bit that, you know, the case population wasn't enormous.
 14 I did note that.
 15 **Q.** If you'd seen it at the time, maybe it would have caused
 16 you to ask, "Hang on a minute, can we really rely on
 17 these headline conclusions"?
 18 **A.** Well, I've tried to explain that I think one of the core
 19 issues with this thing was putting -- was percentages of
 20 the populations of people that were actually looked at.
 21 So, you know, as we've discovered, a huge number of
 22 people --
 23 **Q.** If I can stop you there, Mr Parker. Whether it was 136
 24 or it was 900-odd, if you were getting, I'd like to say,
 25 probably expensive legal advice --
 203

1 **A.** Yeah.
 2 **Q.** -- and, in your witness statement, you say you'd
 3 probably have been briefed by General Counsel?
 4 **A.** Probably.
 5 **Q.** Now, elsewhere in the witness statement, you reflect on
 6 the advice, reading it now, having been provided with
 7 it -- and you can't remember if you had it at the
 8 time -- and you reflect on the broad conclusions, and
 9 you note that there are some criticisms that Mr Altman
 10 made that went beyond the scope of his instructions.
 11 I just want to ask you about a couple of things, two
 12 things, from the advice.
 13 **A.** Yeah.
 14 **Q.** First, in your witness statement, you note that he
 15 reviewed eight files --
 16 **A.** Yeah.
 17 **Q.** -- and he considered three cases.
 18 **A.** Yeah.
 19 **Q.** Yeah. Now, Mr Beer took you this morning to some
 20 correspondence, which you didn't see, narrowing the
 21 scope of Mr Altman's instructions to cover 19 cases, if
 22 you remember. You hadn't seen that. Did you know at
 23 the time, if you can remember, that the scope of his
 24 advice had been narrowed still, to eight cases?
 25 **A.** Honestly, I don't know and I can't tell you.
 202

1 **A.** Yeah.
 2 **Q.** -- from a criminal silk, on the advice of Mr Swift, on
 3 whom you were relying, that all the cases should be
 4 reviewed --
 5 **A.** Yeah.
 6 **Q.** -- and you were being told that only eight cases were
 7 being looked at and, in fact, he was only going to
 8 analyse three, would that not have set up a red flag for
 9 you?
 10 **A.** Well, I said I looked back at the advice and it -- you
 11 know, you're right to point it out. At the time, it
 12 seemed relatively reassuring, yes.
 13 **Q.** But, if you had seen it, would you have not said, "Hang
 14 on a minute, we're only looking at eight cases"?
 15 **A.** I might have done, yeah.
 16 **Q.** Okay. Does that help with your memory as to whether you
 17 read it or didn't read it at the time?
 18 **A.** Honestly not, no.
 19 **Q.** Okay. Turning to the second thing I wanted to ask you
 20 about. Now, Mrs Hamilton was one of the three cases.
 21 **A.** Yeah.
 22 **Q.** I only want to look at one part of the advice which
 23 deals with the circumstance of Mrs Hamilton's plea only
 24 being accepted on the condition related to repayment of
 25 money.
 204

1 A. Yeah.
 2 Q. It's at POL00022854, and I want to look at page 27. If
 3 it's okay with you, Mr Parker, for time, I'm just going
 4 to take you to the two paragraphs that I want you to
 5 look at. You can trust me that it's the advice. If
 6 somebody can bring that up, I'd be grateful.

7 I want to look at page 27, and it's paragraphs 106
 8 and 107. Thank you. I'll just take it briefly. I'll
 9 read it so everybody knows what I'm talking about. He
 10 says:

11 "The proposal here, however, ultimately to invite
 12 the court to order the count be left [that's the count
 13 of theft to be left on the record] on the file as
 14 a condition of repayment was highly unusual if not
 15 exceptional, and was, it seems to me, fraught with
 16 difficulty, despite the judge approving this course.

17 "First, the effect of the arrangement was that the
 18 prosecution was in effect allowing Mrs Hamilton to buy
 19 her way out of a charge upon which the in-house lawyer
 20 and counsel had advised there was [sufficient] evidence.
 21 Second, the question might be asked why if the
 22 prosecution felt the evidence was sufficient to support
 23 the count of theft it was content to drop it for
 24 repayment of the losses. Third, if Mrs Hamilton did
 25 have a tenable defence to the count of theft (although

205

1 memory -- can you recall if it recorded any discussion
 2 of any specific matters or criticisms that ought to be
 3 considered for referral to the CCRC?

4 A. No, I can't.

5 Q. You've spoken today about the advice you were given on
 6 privilege in this civil litigation.

7 A. Yeah.

8 Q. Did that briefing, or any advice you can recall being
 9 given around the time of this advice, cover the Post
 10 Office's continuing obligations on disclosure as
 11 a prosecutor?

12 A. I can't. I'm sorry.

13 Q. At this time, when you were being briefed, or when you
 14 read this advice, you would have been aware, I think,
 15 that the rest of the Board wouldn't have read the Swift
 16 Review or its recommendations; is that right?

17 A. Possibly. Why?

18 Q. Well, you knew that they hadn't. Only the four internal
 19 staff had been given it. You had a copy. It was being
 20 controlled. You knew the rest of the Board hadn't seen
 21 the Swift Review; is that right?

22 A. I'm sorry, what's the point you're making, though?

23 Q. I'm asking you a question --

24 SIR WYN WILLIAMS: Never mind about that, Mr Parker. Just
 25 say "yes" or "no".

207

1 I have seen no defence statement providing any defence,
 2 and doubt a defence statement was ever served) then it
 3 might be argued that the suggestion she should repay the
 4 losses in return for the dropping of the theft count,
 5 which was an idea originating with the prosecution,
 6 placed undue pressure on her, despite the fact that she
 7 was represented, and despite having pleaded guilty to
 8 false accounting."

9 Now that's an important, serious criticism, isn't
 10 it, Mr Parker?

11 A. Yes. I mean, he goes on. I mean, it's quite hard for
 12 me to comment on this. There's a lot going on on this
 13 paragraph. There's a lot going on on the whole page,
 14 and I haven't got the whole document at my disposal. So
 15 to ask me to comment, you know, on a specific case,
 16 I think is -- unless we have proper time, and I'm not --
 17 yeah, go on.

18 Q. I simply wanted to ask: did you see this at the time or
 19 were you briefed on it; and would you, if you had been,
 20 have considered it a serious matter?

21 A. So I can't tell you if I saw it and, before opining on
 22 how serious a matter I would have considered it, I'd
 23 have to look at the whole document again.

24 Q. Okay. Did your briefing at that time -- I know that you
 25 can't remember it, but just to try to prompt your

206

1 A. Okay, yes.

2 MS PATRICK: Yes, so you knew?

3 A. Yes.

4 Q. So, at that point, nobody else on the Board could have
 5 judged if Mr Altman had or had not done what Mr Swift
 6 had recommended, could they?

7 A. Well, I'm not sure who the Altman advice was shared
 8 with, actually. This was one of the outputs of the
 9 Swift Review.

10 Q. That's why I put the question the way that I did. You
 11 had seen both the Swift Review and were being briefed,
 12 or had been shown, a copy of the Altman advice. You
 13 were uniquely placed. Nobody else could compare the two
 14 and say, "Well, Mr Altman has kind of not done what the
 15 Swift Review expected him to do". You were the only
 16 person that was in the position to do that, apart from
 17 staff; is that fair?

18 A. Yeah, I think at the time I just took this advice, which
 19 seemed to me to be an adequate response on the first and
 20 second recommendation. I think, you know, I wasn't busy
 21 comparing things, it just looked to me -- and I was --
 22 I think I was told -- I think I was told at the time,
 23 this met the brief.

24 Q. Well, Mr Parker, I'm not trying to be flippant here but
 25 you said comparing one thing or the other. This is

208

1 a very serious question of whether the Post Office had
 2 met its prosecutorial duties to people who it had
 3 convicted of criminal offences.
 4 **A.** Mm, mm.
 5 **Q.** So being the only person on the Board who could assess
 6 whether or not the advice that the Post Office had
 7 commissioned was actually what it sought to obtain, put
 8 you in a particular position. Did that, at the time,
 9 cause you to think that you really ought to be looking
 10 really critically at the advice the Post Office was
 11 being given?
 12 **A.** I can't honestly tell you.
 13 **Q.** Okay. Today you've relied a number of times on a belief
 14 that legal advice given to you was competently given in
 15 good faith. Did you owe any responsibility to the Board
 16 and to the business and the Government Shareholder to
 17 actively question or challenge that advice you were
 18 being given?
 19 **A.** I think, as I explained earlier, to challenge advice of
 20 specialists invites the question, you know, how do you
 21 challenge a legal opinion, and I don't have an easy
 22 answer to that.
 23 **Q.** But, at a minimum, you would have had the responsibility
 24 to at least properly consider the advice you were being
 25 given in good faith; is that fair?

209

INDEX

TIMOTHY CHARLES PARKER (affirmed)	1
Questioned by MR BEER	1
Questioned by MR HENRY	164
Questioned by MR STEIN	184
Questioned by MS PATRICK	200

211

1 **A.** I believe I did, at the time.
 2 **Q.** You can't recall now if you ever saw a copy of the
 3 Altman advice?
 4 **A.** I can't for sure.
 5 **Q.** Can you recall if you asked to read it for yourself?
 6 **A.** I cannot. I'm sorry.
 7 **MS PATRICK:** Thank you, Mr Parker.
 8 Thank you, sir. I have no more questions.
 9 **SIR WYN WILLIAMS:** Thank you, Ms Patrick. Is that it,
 10 Mr Beer?
 11 **MR BEER:** Yes, it is, sir.
 12 **SIR WYN WILLIAMS:** Well, thank you, Mr Parker, for making
 13 a full and detailed witness statement and for answering
 14 questions during the course of today. I'm very grateful
 15 to you.
 16 **THE WITNESS:** Thank you.
 17 **SIR WYN WILLIAMS:** We will resume I believe, next Tuesday;
 18 is that correct, Mr Beer?
 19 **MR BEER:** Yes, 9.45, please, sir.
 20 **SIR WYN WILLIAMS:** Very well, 9.45 next Tuesday. Thank you.
 21 **MR BEER:** Thank you, sir.
 22 **(4.36 pm)**
 23 **(The hearing adjourned until 9.45 am**
 24 **on Tuesday, 16 July 2024)**
 25

210

MR BEER: [25] 1/3 1/5 1/9 1/14 1/17 53/7 53/11 53/16 53/18 89/25 90/19 91/1 91/3 113/24 114/3 114/8 114/10 164/3 164/8 164/12 164/14 164/17 210/11 210/19 210/21	'top [1] 68/17 'uncomfortable' [1] 137/16 'Was [1] 86/2 'We [1] 55/21 'whether [1] 148/13 - -- in [1] 141/6 -- that [1] 185/19	15 March [1] 147/14 15 September [1] 55/2 15 years [3] 24/8 24/22 167/13 16 [1] 210/24 16 March [1] 151/22 16 September [1] 94/4 17 August [2] 13/20 19/19 17 June [1] 6/6 173 [1] 74/10 17th [1] 14/16 18 [1] 62/4 18 October [1] 145/3 184 [1] 78/22 19 [3] 118/16 119/15 202/21 19 April [1] 91/13 19 November [3] 160/13 161/24 162/6	182/5 2021 [2] 162/3 163/3 2022 [5] 3/2 3/19 4/1 172/18 172/20 2024 [2] 1/1 210/24 22 January [3] 85/5 106/14 106/19 23 [2] 167/3 167/11 24 January [1] 182/4 25th [1] 34/23 26 January [2] 107/23 109/20 26 July [1] 201/1 268 [1] 2/2 27 [3] 198/22 205/2 205/7 27 May [1] 123/25 28 [1] 30/3 29 April [1] 166/9	106/20 109/18 119/3 8 June [1] 129/16 8 March [1] 63/2 8 October [1] 47/9 85 [1] 54/9
MR HENRY: [3] 164/22 175/3 183/24	1	2	3	9
MR STEIN: [3] 184/5 198/18 200/10	1 billion [1] 4/10 1 October [1] 3/1 1.10 [1] 113/25 1.12 [1] 114/5	2.00 [3] 114/1 114/7 145/8 2.15 [1] 196/4 2.45 [1] 14/9 20 [3] 25/20 149/5 185/11 2000 [3] 25/21 73/10 180/5 2008 [1] 3/11 2010 [2] 10/11 180/5 2010-2015 [1] 61/7 2012 [1] 25/22 2013 [3] 10/15 32/14 196/7 2014 [5] 3/8 3/11 3/13 3/19 9/6 2014/15 [1] 32/15 2015 [19] 3/1 4/8 6/6 11/1 13/20 22/10 27/19 41/8 43/1 54/1 54/5 54/10 55/2 55/25 61/7 92/9 94/15 101/4 103/7 2015/2016 [1] 100/20 2016 [13] 53/23 59/9 85/6 100/20 106/14 106/19 107/23 109/15 109/18 109/20 116/19 177/12 201/1 2017 [1] 105/11 2018 [4] 3/24 139/9 140/4 144/4 2019 [5] 147/11 147/14 184/9 184/14 184/21 2019/20 [1] 185/11 2020 [12] 91/7 91/13 92/7 94/4 103/10 103/11 160/13 162/6 162/21 162/22 166/9	26 January [2] 107/23 109/20 26 July [1] 201/1 268 [1] 2/2 27 [3] 198/22 205/2 205/7 27 May [1] 123/25 28 [1] 30/3 29 April [1] 166/9	9 October [1] 43/1 9.45 [3] 210/19 210/20 210/23 9.48 [1] 1/2 900 [1] 24/22 900-odd [1] 203/24 959 [2] 166/4 166/13
MS PATRICK: [3] 200/15 208/2 210/7	10 [6] 61/10 61/12 128/20 136/1 164/18 164/19 10 June [1] 126/3 10 September [5] 27/19 34/22 49/7 49/24 54/1 10.00 [1] 1/10 10.30 [1] 145/3 100 [1] 78/21 100 million [5] 184/23 185/7 185/11 185/17 186/21 102 [1] 62/15 106 [2] 64/7 205/7 107 [1] 205/8 11 [1] 109/23 11 August [1] 22/10 11,500 [1] 4/13 11.13 [1] 53/13 11.15 [1] 53/8 11.25 [1] 53/9 11.28 [1] 53/15 113 [1] 201/9 12 [1] 128/20 12.25 [2] 90/20 90/23 12.35 [1] 90/21 12.36 [1] 90/25 120,000 [1] 140/16 125 [1] 67/12 126 [1] 1/24 13 [1] 157/16 13 May [1] 116/19 130 [1] 167/2 136 [6] 2/14 23/1 23/3 26/15 167/3 203/23 136 pages [2] 1/22 2/21 14 [1] 157/6 14 June [1] 136/1 14 May [1] 123/25 145 [1] 69/15 15 [3] 32/15 47/13 52/8 15 December [1] 55/13 15 July [1] 157/8	3	3	A
SIR WYN WILLIAMS: [29] 1/4 1/6 1/13 53/10 53/17 88/11 88/15 89/2 89/6 89/18 89/24 90/22 91/2 114/2 114/9 164/7 164/13 164/16 164/20 175/1 184/3 198/16 200/9 200/12 207/24 210/9 210/12 210/17 210/20	THE WITNESS: [4] 53/12 114/4 184/2 210/16	3.18 [1] 164/9 3.30 [2] 164/6 164/11 3.4 [1] 37/22 30 minutes [1] 164/18 30 years [1] 12/14 34 [2] 61/17 61/17 35 [1] 61/18 38 [2] 66/15 157/21	abbreviated [1] 182/18 abilities [1] 122/2 ability [6] 12/24 69/19 71/2 73/20 168/13 176/25 able [10] 10/6 31/22 37/24 82/8 86/14 120/15 122/23 174/18 185/11 201/18 about [142] 2/23 3/2 5/24 7/11 7/12 8/23 9/2 10/16 11/2 12/2 13/15 13/17 13/19 14/19 15/2 15/8 16/2 16/3 16/22 17/2 20/24 21/18 23/19 25/21 27/18 30/5 32/10 32/18 32/22 35/10 36/2 36/7 36/9 37/17 37/22 41/24 42/10 44/6 45/2 45/10 48/14 49/19 50/17 50/19 53/3 54/2 54/8 58/6 59/13 63/11 65/12 65/12 69/21 70/9 70/14 71/17 73/6 73/10 75/13 75/25 76/11 76/16 80/2 82/8 88/10 88/12 89/4 92/7 93/11 93/20 94/5 95/10 96/24 97/1 100/18 100/19 103/17 105/3 105/14 105/15 105/18 105/19 105/20 105/25 106/12 107/6 108/5 109/25 110/2 116/1 122/13 122/16 122/23 123/4 123/7 124/10 125/22 125/23 129/16 131/3 132/7 137/19 138/20 138/24 140/18 141/10 141/23 145/22 151/4 152/18 153/17 156/20 159/20 161/6 162/17 162/25 170/15 175/25 177/18 178/22 178/24 180/1	
'13 [2] 25/22 162/5 '17 [1] 142/6 '18 [1] 144/5 '21 [1] 162/21 '98 [1] 25/18 '99 [1] 25/18 'aggressive' [3] 141/15 141/16 145/11 'amended' [1] 70/1 'analysis [1] 68/17 'any [1] 48/13 'at [1] 148/22 'bottom [1] 68/10 'breached' [1] 140/6 'conduct' [1] 132/12 'considerable [1] 140/1 'contained' [1] 139/17 'day [1] 140/12 'fake' [1] 69/19 'Has [1] 37/16 'independent [1] 38/9 'just [1] 35/20 'normal' [1] 20/17 'Post [1] 149/3 'procedural [1] 149/18 'review' [1] 35/5 'risk [1] 149/6 'sell' [1] 137/22			4 4 February [1] 162/2 4 March [1] 109/15 4.36 [1] 210/22 40 [1] 47/22 43 [3] 23/4 24/10 67/11 5 50 [2] 25/20 25/23 50 million [1] 185/1 500,000 [4] 18/3 23/24 192/4 192/18 51 [1] 69/15 53 [2] 69/14 72/9 57 [1] 140/19 59 [2] 198/19 198/22 6 6 million [1] 23/24 60 [1] 163/3 64 [1] 74/10 65 [2] 75/18 110/25 66 [1] 75/11 66 pages [1] 59/7 6th [1] 15/17 7 78,000 [2] 192/5 192/19 8 8 February [4] 59/9	

A	accurate [7] 92/13 92/15 92/18 92/19 93/1 130/11 130/16 accurately [1] 31/20 accusation [1] 62/12 achieve [5] 35/24 37/15 41/4 41/13 96/4 acknowledge [1] 141/12 acquainted [2] 175/14 176/11 across [4] 28/22 68/20 69/2 136/5 act [5] 102/24 149/6 150/6 152/13 155/19 acting [2] 90/6 140/20 action [14] 29/4 48/13 57/18 59/24 61/4 61/9 64/5 94/14 96/8 96/15 118/25 124/4 150/3 161/12 actions [5] 35/13 36/20 36/23 120/16 193/25 active [2] 43/21 106/4 actively [2] 153/2 209/17 activities [2] 29/23 175/13 activity [1] 19/12 actual [1] 12/1 actually [47] 13/1 15/3 21/7 24/11 24/20 25/13 26/3 35/24 36/14 37/14 38/21 41/1 42/13 51/15 52/24 53/1 53/4 57/14 58/3 65/22 71/13 73/12 76/2 77/17 87/7 95/4 123/12 140/6 142/16 155/8 159/9 167/5 171/6 175/10 175/14 175/15 175/20 176/6 176/16 178/15 180/19 180/21 191/6 200/24 203/20 208/8 209/7 ADD [1] 17/17 added [6] 17/17 17/23 20/13 70/6 137/1 160/21 addition [2] 70/6 92/22 additional [3] 111/3 142/23 186/12 address [6] 60/1 73/23 89/3 120/20 120/24 136/12 addressed [5] 37/25 46/6 49/22 64/10 138/22 addresses [1] 10/1	addressing [2] 76/10 104/20 adds [1] 70/3 adduced [1] 27/1 Adedayo [1] 164/24 Adedayo's [2] 173/21 174/3 adequacy [1] 106/22 adequate [1] 208/19 adequately [1] 119/24 adjourned [2] 149/12 210/23 Adjournment [1] 114/6 adjudicator [1] 137/13 administration [1] 155/17 admissibility [1] 140/3 admission [1] 148/7 adopting [1] 141/1 advance [1] 22/13 adversarial [2] 168/24 170/1 adversarially [1] 181/5 advice [116] 9/11 39/18 39/24 40/1 40/8 50/18 51/2 63/2 63/11 63/24 66/17 73/17 73/23 75/13 75/15 77/16 78/12 78/13 78/16 80/4 80/6 80/25 83/3 83/5 83/16 83/21 86/22 87/5 90/4 90/14 94/19 94/23 96/3 96/18 104/10 110/8 110/13 117/7 125/12 125/13 126/7 126/10 127/15 127/16 127/17 128/11 128/12 128/15 128/17 129/6 129/10 133/11 133/25 134/1 134/3 134/4 134/7 134/21 135/3 135/7 135/8 135/13 135/14 135/22 136/23 136/24 138/7 147/17 147/22 151/9 155/6 155/6 155/7 155/8 155/14 156/10 156/11 156/14 157/7 157/13 159/7 160/1 160/25 161/3 161/16 161/23 162/5 162/8 168/11 200/25 201/4 201/11 201/17 202/6 202/12 202/24 203/2 203/25 204/2 204/10 204/22 205/5 207/5 207/8 207/9 207/14 208/7 208/12 208/18 209/6 209/10	209/14 209/17 209/19 209/24 210/3 advices [1] 183/9 advise [8] 47/8 51/10 83/12 124/25 125/2 128/3 157/10 183/15 advised [17] 77/19 78/24 79/13 79/17 80/18 81/6 81/15 82/10 83/3 83/24 101/9 113/14 130/20 131/1 138/6 140/10 205/20 advisers [1] 101/5 advising [4] 52/20 106/22 128/6 177/15 aegis [4] 93/25 126/11 127/11 135/23 affairs [2] 17/10 102/13 affect [1] 67/15 affected [9] 24/15 25/6 29/23 31/5 68/8 98/23 102/20 171/18 176/25 affecting [2] 42/25 69/10 affects [1] 70/8 affirmed [2] 1/7 211/2 afraid [2] 88/7 171/11 after [30] 3/4 6/16 14/5 16/16 21/13 34/21 40/5 40/6 40/7 44/10 50/7 59/12 92/6 101/3 104/16 104/17 105/24 109/17 115/2 116/7 124/12 159/11 159/21 161/18 172/3 173/12 178/18 182/5 182/13 199/21 aftermath [2] 65/7 65/13 afternoon [4] 91/1 94/7 114/8 164/12 afterwards [2] 33/5 48/23 again [58] 3/21 9/23 11/23 13/5 13/7 13/12 15/17 17/3 17/23 17/23 23/11 24/4 28/4 29/20 33/21 34/2 36/18 42/9 47/15 49/11 50/4 51/9 52/22 54/22 56/18 60/10 65/23 66/5 66/7 69/11 74/1 75/7 76/3 80/3 81/9 82/18 88/20 94/4 96/21 103/3 104/4 110/12 123/1 131/7 144/13 160/2 161/13 162/23 167/24 168/5 169/9 170/16 170/19 185/20 188/7 190/8	203/12 206/23 against [10] 35/18 96/3 96/15 96/18 112/9 113/10 124/10 127/11 133/10 160/9 agency [1] 169/5 ago [8] 11/1 52/23 56/5 108/2 123/5 123/8 133/23 195/14 agree [19] 14/11 31/24 37/4 38/20 52/14 64/7 67/7 75/9 75/22 76/6 79/2 101/23 113/21 134/12 162/4 168/7 175/9 187/20 189/17 agreeing [2] 7/16 188/7 Ah [1] 115/1 ahead [8] 19/20 20/25 27/21 52/5 85/9 91/17 94/7 117/16 aim [4] 37/25 52/13 61/24 112/21 aimed [1] 12/17 aims [1] 9/17 air [1] 13/20 aired [1] 19/18 AI [1] 152/2 Alan [2] 99/19 180/16 alarm [2] 1/10 8/11 albeit [1] 3/5 Alexander [1] 61/15 Alice [2] 3/4 11/17 aligns [1] 69/7 Alisdair [1] 147/15 all [82] 2/23 5/6 14/16 18/16 18/17 22/3 27/12 27/20 29/24 33/4 39/19 41/6 42/10 44/19 55/23 56/25 76/12 78/9 81/24 83/4 83/13 87/21 90/9 98/2 98/18 98/21 98/23 98/24 99/2 99/5 99/15 99/21 99/25 100/10 104/2 104/15 114/21 115/9 115/16 116/1 119/19 121/11 123/20 128/19 133/22 134/15 138/1 138/8 151/3 154/4 154/6 157/18 159/9 161/15 162/20 162/20 163/21 163/22 164/20 165/22 167/1 170/6 171/7 172/25 174/7 174/8 174/12 176/7 180/9 185/20 186/11 193/18 193/25 196/3 196/5 196/18 198/4 198/23 199/13 200/9 203/7 204/3 allegation [5] 19/21
----------	---	--	---	--

A	Altman's [2] 63/2 202/21	185/12 187/2 193/6 193/8 194/23 209/22	127/16 128/12 142/21 150/18 182/18	approaching [1] 144/13
allegation... [4] 61/21 63/7 64/16 117/6	always [16] 8/8 8/15 8/17 8/19 33/16 39/2	answered [2] 47/19 128/17	appeal [12] 33/8 63/25 113/8 148/1	appropriate [13] 37/19 41/16 49/5 64/4
allegations [12] 18/18 19/14 19/15 19/24 37/17 42/8 117/15 190/12 190/19 190/25 191/16 191/18	52/19 63/14 63/18 70/9 77/3 100/5 168/19 176/12 186/13 186/17	answering [2] 164/3 210/13	149/3 149/12 150/1 150/3 156/5 159/4 159/5 182/14	94/13 94/14 102/13 111/5 112/20 116/2 117/3 147/1 196/1
alleged [3] 21/22 26/17 48/25	Alwen [5] 13/21 15/18 20/10 22/12 22/19	answers [2] 162/23 169/24	appeals [2] 33/7 147/17	appropriately [2] 42/15 92/17
allegedly [1] 166/21	am [19] 1/2 27/21 29/1 40/9 43/2 45/1	antagonised [1] 149/16	appear [7] 109/10 129/5 142/17 165/9 169/24 177/24 196/6	approved [1] 136/5
alleging [1] 26/15	53/13 53/15 78/23 80/22 110/8 111/3 111/4 112/18 118/23 128/19 159/19 166/16 210/23	Anthony [5] 43/7 44/10 44/15 129/19 165/1	appeared [2] 167/2 182/16	approving [1] 205/16
allocation [2] 105/4 198/17	amend [3] 70/2 73/2 73/20	anticipated [1] 55/16	appears [5] 10/18 67/20 100/17 168/9 193/8	approximately [1] 62/4
allow [2] 28/24 58/1	amended [1] 110/23	any [81] 5/14 8/23 12/2 15/11 21/20 23/6 23/9 24/16 29/4 30/9 32/8 32/17 34/20 35/19 39/1 43/22 44/1 47/15 55/10 57/18 59/24 61/4 61/8 63/10 63/25 64/3 66/20 67/15 68/3 68/4 72/8 72/14 72/16 74/1 74/13 77/13 79/11 83/19 84/1 84/10 85/15 86/18 88/12 89/4 94/14 95/2 96/10 100/9 101/24 102/7 111/9 113/11 124/23 127/19 132/2 132/22 133/20 134/5 136/5 137/11 137/12 141/20 143/4 143/21 144/19 144/21 145/18 161/3 169/15 171/9 171/22 182/9 183/10 185/16 186/12 203/10 206/1 207/1 207/2 207/8 209/15	163/10	are [147] 2/16 2/19 5/25 7/6 8/6 8/13 11/8 12/9 13/13 13/25 14/24 18/23 19/21 21/20 23/9 24/1 24/6 25/8 25/23 26/5 26/6 26/6 31/7 32/5 38/3 38/17 39/14 39/16 39/18 39/19 41/12 43/16 43/16 43/21 46/10 47/7 47/13 49/12 50/2 61/8 62/4 62/15 63/4 63/18 65/14 66/16 67/7 67/17 69/4 69/5 69/20 71/12 72/15 73/5 74/12 74/19 75/19 76/12 76/17 86/22 88/17 89/20 91/21 91/23 92/20 95/20 98/16 99/10 100/3 102/1 102/23 105/8 105/8 106/13 109/3 111/4 117/11 117/15 117/18 118/6 118/12 121/8 121/9 121/14 122/4 122/4 122/15 122/23 123/13 128/23 130/17 130/21 131/5 131/17 132/7 132/7 132/25 134/9 134/17 135/3 135/4 135/5 141/4 142/19 142/21 143/14 144/11 145/22 147/10 148/5 149/10 150/1 150/3 151/4 152/14 156/4 157/22 158/17 158/23 160/12 160/14 163/19 164/5 164/17 165/20 167/11 170/17 171/8 171/23 173/2 175/14 175/20 176/18 179/11 179/16
allowed [2] 40/9 163/10	amendments [1] 110/23	anybody [6] 31/5 89/10 95/3 95/7 174/24 195/17	applicable [1] 67/3	Arbuthnot [6] 14/15 35/7 35/24 61/13 62/13 133/17
allowing [1] 205/18	among [1] 148/8	anything [24] 9/20 11/21 13/4 13/8 15/5 15/14 16/22 58/4 58/12 86/2 86/17 95/13 95/17 103/11 110/14 111/19 115/12 162/9 163/5 163/11 178/22 182/8 182/15 199/7	applicants [2] 44/2 62/13	Arbuthnot's [1] 35/9
alluding [2] 65/15 65/16	amongst [1] 152/18	anyway [2] 72/7 137/22	application [21] 122/1 139/7 139/16 139/19 140/14 140/17 140/23 142/9 142/19 147/12 148/4 149/11 149/15 149/23 150/7 152/15 154/21 154/23 155/24 156/7 156/16	are
almost [5] 18/3 155/9 155/15 192/3 192/17	amount [8] 5/5 99/1 154/15 163/7 163/20 184/22 197/21 197/25	apart [2] 192/8 208/16	applications [1] 113/5	are [147] 2/16 2/19 5/25 7/6 8/6 8/13 11/8 12/9 13/13 13/25 14/24 18/23 19/21 21/20 23/9 24/1 24/6 25/8 25/23 26/5 26/6 26/6 31/7 32/5 38/3 38/17 39/14 39/16 39/18 39/19 41/12 43/16 43/16 43/21 46/10 47/7 47/13 49/12 50/2 61/8 62/4 62/15 63/4 63/18 65/14 66/16 67/7 67/17 69/4 69/5 69/20 71/12 72/15 73/5 74/12 74/19 75/19 76/12 76/17 86/22 88/17 89/20 91/21 91/23 92/20 95/20 98/16 99/10 100/3 102/1 102/23 105/8 105/8 106/13 109/3 111/4 117/11 117/15 117/18 118/6 118/12 121/8 121/9 121/14 122/4 122/4 122/15 122/23 123/13 128/23 130/17 130/21 131/5 131/17 132/7 132/7 132/25 134/9 134/17 135/3 135/4 135/5 141/4 142/19 142/21 143/14 144/11 145/22 147/10 148/5 149/10 150/1 150/3 151/4 152/14 156/4 157/22 158/17 158/23 160/12 160/14 163/19 164/5 164/17 165/20 167/11 170/17 171/8 171/23 173/2 175/14 175/20 176/18 179/11 179/16
alone [1] 63/10	analysed [1] 110/23	apologies [1] 170/25	applied [2] 141/2 148/3	
along [3] 87/16 155/9 201/10	analogy [1] 179/6	apology [2] 170/21 171/12	apply [8] 93/14 123/5 140/3 148/11 150/17 153/11 153/23 155/22	
alongside [3] 2/4 56/8 62/11	analyse [2] 203/9 204/8	apparent [3] 165/14 165/15 165/17	applying [4] 67/2 139/21 140/12 154/9	
already [6] 53/24 98/22 145/10 189/21 191/19 198/16	analysis [6] 65/10 68/4 68/6 72/12 74/13 168/6	apparently [6] 98/12	appoint [4] 2/10 6/17 92/11 92/14	
also [40] 3/20 4/2 4/14 5/11 14/14 18/15 24/13 28/10 62/6 62/13 63/23 64/2 73/23 77/21 80/14 85/14 91/12 93/7 97/10 102/17 105/11 105/14 105/20 107/8 110/4 115/9 118/6 118/23 126/13 127/18 132/17 142/21 150/2 154/25 158/23 175/18 188/12 188/20 190/5 191/7	analysis' [1] 140/1		appointed [2] 30/4 92/6	
Alterd [1] 119/10	analytical [1] 68/21		appointing [3] 2/3 2/9 28/13	
alternative [1] 68/6	Andrew [3] 21/13 107/24 129/17		appointment [10] 6/25 8/22 9/7 9/21 12/1 13/11 37/23 38/11 42/19 101/3	
Alternatively [1] 156/2	anecdotal [1] 9/17		appointments [2] 7/7 175/12	
alternatives [1] 35/23	anecdotally [1] 98/11		appraised [3] 10/13 11/8 12/10	
although [17] 8/18 12/23 39/5 39/22 62/22 70/10 79/1 79/11 85/17 93/3 97/17 100/12 117/10 148/21 152/11 180/18 205/25	Angela [2] 61/14 200/16		appreciate [2] 168/9 173/8	
Altman [14] 2/4 65/25 66/6 118/15 119/14 160/20 200/25 201/11 202/9 208/5 208/7 208/12 208/14 210/3	annoy [1] 171/8		appreciated [1] 127/19	
	annual [2] 7/17 9/11		approach [14] 35/17 68/6 68/9 68/16 97/13 102/19 103/6 103/19 110/2 130/5 140/11 140/25 141/15 141/17	
	another [22] 8/20 16/2 24/21 33/16 35/20 41/6 44/5 45/6 83/13 84/24 92/2 98/9 100/1 128/3 143/12 147/7 185/25 186/14 186/15 187/25 194/14 201/19		approaches [1] 10/18	
	answer [36] 7/7 11/15 41/17 45/9 47/4 55/9 56/5 78/9 88/20 89/14 89/23 96/21 96/23 99/10 103/12 122/10 123/4 128/14 130/23 132/5 134/25 146/14 156/13 162/10 166/17 166/18 171/16 171/25 181/4 181/9			

A	96/10 105/12 105/14 105/24 114/23 118/3 121/25 126/7 128/16 134/9 135/4 135/6 142/15 145/17 145/23 166/25 167/10 181/24 187/10 194/3 194/4 205/21 210/5 asking [20] 11/11 16/5 48/12 51/15 89/2 105/5 105/8 111/16 143/1 145/22 167/22 172/14 193/1 193/6 193/14 194/12 194/16 194/17 194/19 207/23 aspects [4] 83/4 169/19 173/8 180/18 assertion [2] 149/19 176/15 assess [2] 30/23 209/5 assessor [1] 7/7 assistance [5] 12/16 48/19 51/1 51/22 109/22 assistance' [1] 38/9 assistant [3] 6/1 42/22 53/6 assistants [1] 25/5 assisted [2] 38/19 45/5 assisting [1] 38/25 assume [4] 35/6 36/5 39/18 203/1 assumed [8] 81/16 114/21 121/2 121/3 127/17 134/23 153/20 177/13 assuming [4] 29/2 71/23 87/22 144/12 assumption [9] 30/13 30/19 31/13 36/8 78/2 78/3 78/5 78/7 153/12 Assurance [1] 9/3 assurances [1] 69/20 assure [2] 170/20 182/25 at [324] at page 2 [1] 123/22 attached [6] 22/13 91/14 91/21 92/21 139/14 148/17 attaching [1] 91/18 attempt [1] 171/14 attempted [1] 5/10 attempting [1] 183/1 attended [1] 84/5 attending [1] 125/20 attention [8] 9/20 29/3 29/11 53/4 67/18 176/7 176/13 198/13 attributed [4] 13/14 14/24 35/9 75/5	attributes [1] 129/14 audience [1] 111/6 audit [14] 16/2 73/3 73/21 192/9 192/11 192/13 192/22 193/2 193/8 193/15 194/3 194/23 195/7 197/10 audited [3] 192/6 192/20 193/11 August [3] 13/20 19/19 22/10 author [1] 157/16 author's [1] 61/18 authored [1] 47/14 authorised [1] 73/1 authority [1] 88/16 authors [2] 47/12 61/12 authorship [1] 23/15 availability [1] 75/16 available [7] 9/18 22/1 79/14 83/25 85/5 86/19 117/12 average [1] 167/20 await [1] 43/14 awarded [1] 140/14 aware [29] 10/23 26/4 28/15 30/4 42/25 49/19 49/20 58/4 62/15 71/20 74/12 78/23 82/4 93/13 95/5 99/15 103/4 111/3 134/15 135/11 147/10 149/17 153/8 156/20 159/6 167/6 173/25 174/2 207/14 awareness [1] 33/2 away [10] 42/24 46/2 57/3 57/22 71/4 71/5 72/7 81/20 177/20 199/17 awful [5] 104/19 104/20 175/25 176/1 183/22 axe [2] 83/18 179/5	background [9] 2/25 21/5 22/4 101/17 152/20 174/13 174/21 174/23 177/21 backward [1] 123/7 backward-looking [1] 123/7 bad [5] 50/19 50/21 76/4 128/20 137/15 badged [1] 138/15 baked [1] 197/22 balance [4] 70/8 96/15 156/11 170/10 balances [4] 74/16 74/20 75/2 75/5 balancing [6] 69/18 70/2 70/5 70/10 72/19 73/19 Bank [1] 74/18 bar [1] 19/3 Baroness [28] 6/11 14/2 14/8 14/12 16/4 16/18 27/18 36/1 38/4 44/15 48/12 49/8 49/24 53/25 54/18 54/23 85/9 90/1 92/10 101/3 107/23 108/8 109/14 109/16 125/17 130/8 133/16 136/11 barrels [1] 56/3 barrels' [1] 55/22 barrier [1] 185/16 barrister [8] 38/14 45/6 48/2 48/4 51/10 53/5 65/9 124/25 barristers [1] 106/22 barristers' [1] 182/19 base [1] 121/8 based [3] 105/17 118/12 123/3 bases [1] 194/11 basically [1] 31/9 basis [20] 7/17 15/8 36/24 39/25 42/5 48/22 66/21 66/24 67/4 68/21 81/16 90/4 118/17 119/16 134/7 135/2 146/25 163/17 163/18 188/13 baskets [1] 73/2 Bates [1] 99/19 battened [1] 180/11 battle [1] 169/12 BBC [1] 190/3 be [273] bear [2] 83/17 104/23 bearing [3] 57/20 123/15 177/11 became [6] 3/8 11/3 31/4 95/4 142/11 179/7 because [83] 4/12 4/13 4/14 4/16 4/25 12/5 15/6 15/11 19/22	27/10 33/13 33/19 39/5 39/21 45/12 46/5 46/23 50/13 53/3 56/25 58/3 59/7 62/2 63/6 64/2 64/3 65/6 65/24 68/9 70/1 73/13 79/25 88/15 89/13 89/19 90/3 96/16 96/22 97/1 107/18 117/11 122/4 127/22 133/7 134/20 135/11 136/20 137/24 138/16 138/25 144/11 144/25 146/12 151/6 152/22 153/2 153/16 155/1 158/11 160/8 162/11 165/13 165/25 167/15 169/22 171/1 171/4 171/17 173/2 173/15 176/22 177/7 178/13 178/20 180/15 180/23 181/12 183/10 185/10 185/13 188/15 195/13 203/11 become [3] 13/4 142/13 167/6 becoming [1] 152/25 bed [2] 137/14 137/24 been [178] 10/6 10/8 10/21 11/1 12/14 15/4 17/15 18/3 18/9 19/13 21/21 22/23 23/1 24/5 24/7 24/12 24/14 24/15 24/21 24/23 24/25 25/15 26/8 26/23 27/6 27/7 28/3 28/8 28/15 28/18 30/5 32/3 37/9 40/22 42/12 42/24 44/22 50/13 50/15 50/16 50/24 56/14 57/1 57/25 58/16 59/21 60/3 61/3 61/7 62/14 64/11 65/23 66/23 67/14 68/17 70/22 71/6 73/24 74/13 77/12 77/24 83/1 83/6 84/7 86/5 90/14 92/16 95/15 96/5 96/7 96/19 97/12 98/20 98/24 98/25 99/7 99/8 99/8 99/16 99/20 99/22 99/23 100/4 100/11 100/14 100/25 101/25 102/17 108/17 108/19 109/18 110/23 113/11 113/12 117/15 119/1 122/6 122/14 124/12 125/13 129/8 140/25 141/12 143/23 147/8 148/6 150/25 151/1 152/23 153/19 155/4 155/18 156/22 158/12
----------	--	---	--	---

B	81/17 82/4 84/9 93/24 93/25 102/2 102/3 102/9 105/16 105/18 113/7 119/8 120/1 120/17 120/19 124/10 126/8 126/10 134/9 135/4 135/11 135/12 135/22 137/8 137/17 142/4 147/8 149/6 150/14 153/9 156/20 159/25 165/2 167/20 169/23 170/12 171/15 175/17 178/25 179/1 179/14 181/24 185/19 186/21 187/10 188/1 188/13 188/14 194/10 204/6 204/7 204/24 207/8 207/13 207/19 208/11 209/5 209/11 209/18 209/24	beyond [3] 21/25 157/22 202/10 bias [2] 147/19 152/10 biased [3] 150/19 154/18 154/19 biased' [1] 148/16 big [9] 4/15 23/22 34/14 45/2 70/22 73/16 151/16 185/5 188/23 billion [1] 4/10 billions [1] 4/22 BIS [3] 35/13 36/20 133/17 bit [31] 4/20 21/10 27/14 40/17 40/17 42/18 46/2 51/16 52/5 58/13 59/11 84/19 95/9 99/22 105/15 121/11 134/17 150/21 151/13 170/13 170/14 171/7 174/12 184/18 185/1 186/23 189/22 190/7 192/24 201/3 203/13 bits [1] 134/18 black [1] 174/10 blame [2] 172/19 172/21 blow [1] 21/10 BNR [1] 14/8 board [84] 10/22 12/8 39/17 65/5 78/25 79/5 79/5 79/8 79/12 79/13 82/2 82/3 82/12 82/15 83/10 83/16 83/17 83/24 84/1 84/5 84/6 84/20 89/10 92/25 93/3 93/10 94/13 94/21 94/25 97/13 101/8 101/22 101/25 102/9 102/11 102/18 103/7 106/14 107/5 107/6 109/15 116/3 116/9 116/13 124/2 144/6 144/9 144/16 144/23 144/24 145/1 147/16 147/20 150/9 150/10 152/8 152/12 152/13 153/14 153/15 154/10 154/22 160/13 160/20 161/3 161/14 161/16 162/6 162/8 163/1 163/3 163/8 173/13 176/9 183/5 183/8 183/14 183/16 183/23 207/15 207/20 208/4 209/5 209/15 Board's [2] 12/3 144/19 body [1] 74/6 Bogerd [1] 61/14	bold [1] 66/17 Bond [2] 21/14 117/9 booked [1] 55/7 boring [1] 104/5 both [16] 38/2 52/1 55/22 56/3 63/4 69/18 109/23 128/22 128/22 128/23 141/12 142/4 142/12 145/9 159/19 208/11 bottom [14] 5/23 13/20 18/10 19/9 42/20 60/2 116/19 136/1 161/20 163/9 189/20 189/22 189/23 190/9 bought [2] 73/22 102/20 Bourke [5] 34/15 120/8 136/4 138/2 138/4 brackets [1] 48/23 brain [1] 137/19 Bramble [1] 97/10 branch [12] 17/22 23/3 49/1 67/15 68/12 68/23 70/1 70/6 75/4 118/9 199/6 199/11 branch's [1] 70/8 branches [15] 17/20 67/14 68/8 68/18 68/20 68/21 69/3 70/20 72/13 72/17 74/23 75/6 184/8 192/5 192/19 brand [1] 174/15 branding [1] 173/23 brave [1] 99/11 breach [2] 158/2 158/14 break [8] 53/9 53/14 90/21 90/24 109/12 113/25 160/10 164/10 breaking [1] 160/9 Brian [4] 2/4 63/2 118/15 160/20 Bridgen [1] 14/12 brief [15] 14/1 14/6 14/19 43/3 50/7 50/21 78/24 86/22 87/16 150/5 181/1 193/4 193/23 193/24 208/23 briefed [9] 15/4 79/5 176/12 201/11 201/21 202/3 206/19 207/13 208/11 briefing [19] 17/2 20/3 20/5 20/6 31/15 61/2 79/8 85/12 85/16 86/1 87/2 88/1 93/8 187/15 196/20 197/19 203/1 206/24 207/8 briefings [2] 14/21 86/15	briefly [2] 20/8 205/8 brilliant [1] 194/10 bring [7] 57/17 61/19 62/11 66/24 110/4 146/6 205/6 bringing [2] 19/3 99/12 broad [3] 46/15 146/20 202/8 broadly [3] 32/23 37/5 108/12 brought [8] 2/16 9/20 28/18 61/23 63/25 67/6 113/7 178/17 buck [1] 170/5 bug [3] 68/1 68/8 69/9 bugs [12] 24/20 31/7 67/13 67/14 67/17 72/14 98/3 98/11 158/18 198/22 199/2 199/5 build [2] 10/19 160/8 built [1] 178/25 bull's [1] 194/10 bullet [5] 41/12 87/17 107/25 108/3 152/6 bullied [1] 64/17 bullying [2] 19/16 190/23 bunch [3] 128/7 178/2 199/25 bundle [2] 159/10 182/17 burden [1] 176/23 Burke [1] 6/18 business [41] 4/12 4/22 4/24 5/5 6/22 7/24 9/4 11/8 11/10 12/15 12/24 13/4 14/20 15/9 28/24 37/19 37/20 58/15 64/19 104/19 105/20 105/21 105/23 106/6 155/16 163/9 163/17 167/21 172/12 175/15 176/2 180/6 186/9 187/19 187/22 188/13 188/21 189/9 189/15 191/19 209/16 businesses [3] 39/22 165/7 198/2 busy [2] 163/14 208/20 but [188] 4/11 4/20 5/20 5/24 6/18 7/20 9/16 11/23 13/13 14/11 15/5 15/13 15/24 16/1 16/15 19/2 19/20 23/18 23/21 24/6 24/11 24/20 25/3 25/5 28/25 29/22 33/2 33/14 34/14 35/5 38/19 39/7 39/14
----------	--	---	--	---

B	15/18 called [5] 17/3 32/19 153/5 158/7 162/18 came [12] 45/17 54/23 59/1 73/15 111/23 124/14 128/21 131/1 165/16 168/6 188/17 196/19 Cameron [2] 147/15 152/2 campaign [1] 19/10 campaign's [1] 190/19 can [165] 1/3 1/18 1/24 2/13 2/25 4/6 4/20 5/21 7/7 9/1 9/9 9/22 9/23 11/19 12/5 12/12 12/12 13/9 13/11 16/21 16/25 19/3 20/17 21/16 27/16 32/9 34/1 34/24 38/6 40/11 42/18 45/3 46/13 46/15 47/6 49/6 51/21 52/8 53/8 53/16 53/20 54/8 54/22 56/25 61/9 61/17 63/12 64/9 65/14 66/9 67/11 75/5 78/9 79/16 83/13 84/5 84/9 85/4 87/16 87/17 88/11 88/23 89/5 89/15 90/9 90/20 91/1 91/4 94/2 95/19 96/25 97/1 97/20 99/6 100/12 100/16 102/25 103/12 103/16 103/25 104/21 105/3 105/14 106/10 106/15 109/12 112/14 113/25 114/8 114/11 116/18 117/5 118/15 119/14 120/2 120/2 122/5 122/9 123/3 123/6 123/9 123/10 123/22 124/9 124/16 126/2 129/12 129/13 131/20 132/11 134/4 135/16 138/21 139/5 140/14 145/2 146/6 147/11 147/12 151/19 155/20 156/5 157/4 157/7 160/12 161/2 163/6 163/13 163/24 164/12 164/13 166/9 166/11 167/11 167/16 172/14 172/23 173/14 173/25 174/9 174/15 175/4 177/22 182/25 186/7 187/7 189/19 189/25 191/14 191/22 192/25 193/4 193/11 193/12 193/13 197/19 200/19 202/23 203/16 203/23 205/5 205/6 207/1 207/8 210/5	can't [71] 11/1 11/15 11/23 12/5 21/6 30/22 31/19 32/12 32/16 33/1 33/9 35/4 44/13 48/5 58/19 70/16 73/11 78/14 81/18 83/13 84/11 88/14 89/13 89/13 95/7 96/23 109/3 124/19 124/19 124/22 126/1 133/24 134/2 136/18 136/22 137/2 138/8 142/24 143/20 146/9 146/20 153/16 155/14 156/8 159/9 159/15 162/10 163/6 163/13 165/22 172/23 178/14 178/19 185/12 187/2 187/4 195/13 196/16 201/13 201/19 202/7 202/25 203/1 203/4 206/21 206/25 207/4 207/12 209/12 210/2 210/4 candidate [1] 188/1 candidates [2] 6/15 48/1 Candidly [1] 14/23 cannot [9] 13/8 28/19 67/19 70/1 123/10 123/16 133/12 173/14 210/6 cans [1] 26/3 capabilities [1] 8/24 capability [4] 11/2 69/19 70/10 73/1 capable [3] 50/7 137/14 137/24 capacity [2] 105/20 105/21 capital [1] 177/19 capitals [1] 20/13 care [1] 178/22 career [2] 121/24 131/25 careful [1] 9/12 carried [12] 39/4 50/24 64/3 64/11 69/2 77/24 115/4 120/17 122/7 124/18 127/21 147/3 carry [8] 33/14 51/18 68/4 68/24 69/6 72/12 72/19 72/25 carrying [5] 38/18 67/21 132/4 132/23 133/20 Cartwright [4] 63/22 63/23 64/12 157/9 case [34] 28/5 35/11 62/16 62/16 62/20 67/16 68/3 78/15 104/18 111/1 121/13 123/15 123/18 130/10	130/14 139/19 139/25 140/2 140/18 141/13 141/25 142/2 148/24 165/22 169/1 169/9 173/21 174/3 174/3 178/13 178/18 201/6 203/13 206/15 case' [1] 149/1 cases [40] 17/15 17/22 18/10 18/16 18/19 18/25 19/23 21/21 23/8 28/16 28/17 43/25 48/3 48/8 62/5 67/2 67/22 69/10 74/12 103/1 113/7 118/16 119/15 119/19 137/20 158/5 158/23 166/4 166/13 167/3 202/17 202/21 202/24 203/3 203/7 203/9 204/3 204/6 204/14 204/20 cash [5] 4/15 4/15 26/4 26/5 186/12 cast [1] 160/16 category [1] 75/7 cause [6] 23/3 44/2 132/19 151/15 199/10 209/9 caused [7] 10/17 17/21 67/13 67/20 72/15 203/10 203/15 causes [3] 179/23 179/24 180/1 cautious [1] 149/20 Cavender [1] 148/19 CCRC [9] 22/2 35/10 73/25 113/5 160/15 167/4 167/11 178/14 207/3 ceasing [2] 134/7 135/3 CEO [11] 3/11 8/24 9/13 10/9 10/21 12/3 12/11 12/14 105/23 163/24 198/2 CEOs [1] 12/14 certain [5] 62/17 82/18 87/6 117/11 154/15 certainly [33] 2/8 7/20 26/9 33/13 34/10 34/12 52/1 57/21 59/1 60/16 78/10 78/15 80/13 81/20 82/5 93/11 95/4 98/10 105/19 106/3 106/6 108/9 111/14 123/18 128/23 131/19 132/24 134/15 134/16 159/11 170/8 183/22 186/7 certainty [1] 68/7 cetera [6] 38/5 143/15 143/15 152/16	177/16 196/2 chain [7] 15/16 119/7 129/13 136/2 143/13 145/19 146/7 chair [36] 3/4 3/5 3/7 3/8 3/10 3/12 3/13 3/18 3/21 3/24 4/8 6/20 10/22 11/3 11/4 11/5 11/12 12/9 13/4 14/13 20/1 29/2 30/4 39/17 101/4 102/18 105/16 105/17 105/18 106/5 123/19 155/2 169/21 170/5 175/18 184/10 chaired [1] 176/14 chairman [15] 3/1 20/19 27/22 38/3 43/7 48/20 51/1 52/18 54/11 58/22 92/6 96/7 104/16 105/1 106/23 chairman's [4] 79/6 79/9 79/10 106/17 chairmanship [1] 4/3 challenge [7] 8/20 37/6 63/14 141/1 209/17 209/19 209/21 challenged [4] 19/19 35/7 36/6 172/7 challenges [2] 4/19 4/24 Chambers [1] 109/24 chance [1] 15/15 change [11] 89/19 96/6 96/20 141/20 143/4 143/14 145/18 146/1 169/5 172/16 180/21 changed [6] 154/20 156/13 163/19 169/6 173/5 173/20 changes [2] 102/21 103/2 channelling [1] 177/2 channels [1] 146/17 chapters [1] 59/14 character [1] 64/19 characterisation [3] 58/14 117/4 179/15 characterise [1] 170/6 characterised [1] 55/21 charge [13] 61/23 62/2 62/2 62/8 62/11 63/8 63/16 64/18 66/18 66/23 66/24 67/6 205/19 charged [1] 62/23 charges [3] 61/19 62/11 118/17 charging [2] 62/25 66/2 CHARLES [3] 1/7
----------	--	---	---	---

C	20/12 37/16 38/23 41/4 56/7 62/22 62/24 64/10 79/19 80/15 131/12 137/17 141/25 146/22 173/3 clearer [1] 137/11 clearly [6] 20/24 26/22 126/16 150/9 166/24 186/22 client [2] 170/10 174/19 client's [1] 169/1 clients [4] 74/18 167/24 180/22 181/12 cling [1] 95/11 close [1] 176/13 clunky [1] 37/23 CMC [1] 142/8 co [2] 14/12 47/14 co-authored [1] 47/14 coaching [1] 12/16 Code [1] 63/19 cohort [1] 164/23 Coke [1] 26/3 colleagues [4] 146/5 170/2 176/9 183/11 collected [2] 75/19 75/21 collection [2] 130/3 178/16 collectively [1] 102/12 colloquial [1] 182/22 coloured [2] 85/1 110/17 combat [1] 168/24 come [21] 14/4 15/19 16/21 20/14 45/3 54/12 58/21 80/16 82/7 93/6 96/11 109/4 121/1 131/13 162/17 165/24 167/18 185/8 186/17 187/19 200/3 comes [6] 30/24 36/12 140/4 177/18 183/4 185/23 coming [10] 39/18 50/18 53/8 56/15 95/7 108/11 115/4 131/25 132/1 191/10 commas [1] 49/25 commences [1] 152/5 comment [8] 12/5 37/22 45/25 69/22 79/24 143/8 206/12 206/15 commentary [1] 60/7 commented [3] 21/23 108/10 108/16 commenting [1] 108/19 comments [13]	13/14 20/21 20/22 21/15 21/15 35/10 57/22 59/3 71/6 141/2 145/14 145/14 145/21 comments/views [1] 13/14 commercial [6] 4/19 7/24 10/5 12/17 28/24 33/24 commission [3] 28/17 75/1 86/11 commissioned [11] 80/23 92/24 101/2 101/18 112/17 162/18 195/19 195/21 195/23 196/8 209/7 commissioning [2] 37/1 53/22 commitment [3] 28/10 130/7 130/12 committee [9] 9/3 16/3 100/25 144/3 144/9 146/5 147/1 147/7 147/9 Common [7] 139/25 140/4 145/15 149/13 149/17 152/23 169/4 comms [1] 27/13 communicate [2] 135/8 146/19 communicated [1] 135/14 communicating [2] 20/16 111/5 communication [4] 94/5 125/19 146/17 147/2 communications [5] 17/10 26/24 27/7 80/14 141/6 company [18] 4/7 4/11 10/24 11/25 22/11 22/19 32/8 47/10 82/17 92/5 92/9 92/25 96/6 101/5 102/24 152/13 155/23 177/16 company's [3] 102/9 102/12 102/13 compare [2] 167/20 208/13 comparing [2] 208/21 208/25 compensated [1] 180/23 compensation [3] 35/9 98/17 98/23 competent [4] 39/20 41/10 121/4 177/15 competently [1] 209/14 competing [3] 175/6 175/24 176/24 competition [1] 5/2	complainants [1] 117/13 complaining [4] 24/1 24/6 168/3 188/25 complaint [4] 18/14 68/13 75/17 190/1 complaints [12] 26/21 30/8 41/24 42/16 42/16 45/11 49/4 59/15 75/13 94/16 107/3 109/25 complementary [1] 68/16 complete [3] 111/4 127/4 131/6 completed [5] 81/4 82/9 86/16 116/7 117/10 completely [5] 23/16 98/1 98/25 172/16 173/5 completing [1] 130/19 completion [3] 118/25 120/18 130/25 complex [10] 4/11 4/12 4/13 4/14 4/16 5/11 48/3 97/21 99/23 179/11 complexion [2] 24/9 121/10 complexities [1] 47/25 complexity [1] 199/24 complicated [2] 4/18 179/16 complication [1] 160/21 complications [1] 132/20 complied [1] 157/19 complimentary [1] 154/12 comply [1] 157/22 component [3] 65/22 66/7 189/18 components [1] 118/25 compounded [1] 7/15 comprehensive [4] 97/20 97/21 98/22 127/5 comprehensively [2] 69/9 199/17 compress [1] 182/1 compromised [1] 179/6 computer [10] 23/2 24/20 31/1 98/3 98/10 108/10 167/17 181/16 181/21 200/6 conceived [1] 80/5	concentrated [2] 61/4 177/25 concern [12] 10/17 16/22 44/21 70/18 84/17 107/25 110/13 110/17 140/5 143/22 190/18 203/10 concerned [9] 7/12 28/3 99/2 108/11 122/14 141/23 152/25 154/4 176/6 concerning [5] 59/14 73/19 100/20 159/7 160/15 concerns [15] 7/11 8/23 28/6 30/5 32/5 32/5 32/17 34/22 48/14 48/15 50/25 63/11 84/21 156/20 187/16 conclude [4] 67/4 90/13 103/12 148/15 concluded [2] 44/11 139/22 concluding [1] 52/14 conclusion [9] 38/21 43/12 43/14 57/12 110/5 112/22 116/24 128/4 160/5 conclusions [6] 29/6 92/23 93/10 93/16 202/8 203/17 concurrently [4] 3/15 3/18 3/21 4/3 condition [2] 204/24 205/14 conditions [1] 122/6 conduct [15] 33/17 44/16 45/4 51/15 52/2 52/3 52/21 52/24 53/1 100/20 129/2 138/21 139/2 139/2 140/18 conducted [9] 51/5 51/12 111/10 111/12 132/25 133/3 161/21 163/17 188/14 conducting [4] 52/14 117/9 118/7 125/7 conduit [1] 153/19 conference [3] 142/1 142/3 160/14 confessions [1] 64/24 confidence [7] 6/20 35/13 35/25 36/17 36/22 82/17 110/10 confident [2] 7/5 117/19 confidentiality [5] 78/25 79/2 82/17 101/11 102/8 confined [1] 81/19 confirm [10] 13/8 27/22 67/25 72/14
----------	--	--	--	--

C				
<p>confirm... [6] 72/21 78/14 83/13 89/13 126/1 201/18</p> <p>confirmation [1] 65/8</p> <p>confirmed [10] 6/17 15/23 68/3 68/25 85/16 86/25 94/12 118/15 119/14 140/2</p> <p>conflated [1] 87/12</p> <p>confusing [1] 36/11</p> <p>connected [1] 16/6</p> <p>connection [2] 85/20 145/12</p> <p>cons [1] 38/17</p> <p>conscious [1] 134/8</p> <p>consciously [1] 179/12</p> <p>consensus [1] 9/15</p> <p>consequence [4] 94/20 143/24 163/5 163/12</p> <p>consequences [7] 56/11 56/24 57/7 80/18 93/23 97/6 98/16</p> <p>consider [18] 52/10 59/24 64/12 68/5 69/12 70/3 72/11 74/23 75/15 86/17 91/19 101/21 120/19 122/24 150/10 152/14 159/2 209/24</p> <p>considerable [2] 138/23 139/20</p> <p>considerably [1] 186/21</p> <p>consideration [7] 9/12 14/18 52/18 59/22 85/1 103/5 176/14</p> <p>considered [11] 45/15 49/23 64/1 127/19 136/13 148/14 157/24 202/17 206/20 206/22 207/3</p> <p>considering [3] 13/25 28/17 125/16</p> <p>considers [1] 48/20</p> <p>consisted [1] 130/1</p> <p>consistent [3] 30/15 112/22 140/10</p> <p>constant [1] 186/9</p> <p>constantly [1] 175/12</p> <p>construction [1] 148/3</p> <p>constructively [1] 140/20</p> <p>consultant [1] 38/15</p> <p>consultants [2] 58/20 58/20</p> <p>consultation [1] 47/8</p> <p>consuming [1]</p>	<p>163/23</p> <p>contained [2] 65/18 127/1</p> <p>contains [1] 91/14</p> <p>contemporaneous [1] 139/1</p> <p>contend [1] 69/25</p> <p>contending [1] 163/2</p> <p>content [3] 85/15 87/1 205/23</p> <p>contents [3] 2/17 84/15 107/7</p> <p>context [26] 24/5 26/11 26/13 26/22 33/6 58/9 94/1 104/7 104/15 104/23 104/25 123/17 125/15 141/6 144/7 151/9 154/1 162/23 162/24 163/2 164/1 178/15 187/17 187/18 187/18 189/14</p> <p>contextually [1] 184/25</p> <p>continue [9] 8/4 50/22 102/23 126/12 126/14 133/8 135/23 137/4 199/4</p> <p>continued [3] 9/13 125/4 126/9</p> <p>continues [6] 23/10 56/6 95/25 111/2 122/21 137/3</p> <p>continuing [2] 138/14 207/10</p> <p>contract [5] 42/12 97/25 98/8 98/17 168/22</p> <p>contracts [1] 29/24</p> <p>contractual [1] 200/7</p> <p>contradicted [1] 187/1</p> <p>contradictory [1] 132/20</p> <p>contrary [2] 69/20 70/12</p> <p>contrast [2] 57/19 57/24</p> <p>contributed [1] 22/6</p> <p>contribution [1] 5/8</p> <p>contrition [1] 170/24</p> <p>control [3] 69/3 169/22 169/25</p> <p>controlled [2] 101/13 207/20</p> <p>controls [1] 72/25</p> <p>conventional [1] 166/19</p> <p>conversation [5] 11/2 11/19 14/5 27/22 109/2</p> <p>convict [1] 62/7</p> <p>convicted [19] 24/12 24/23 129/3 151/1 158/17 158/21 159/2</p>	<p>165/12 166/1 167/7 167/12 167/19 167/20 167/25 168/3 182/10 189/1 200/17 209/3</p> <p>conviction [9] 63/20 66/20 66/21 66/25 67/5 166/5 173/24 174/4 174/14</p> <p>convictions [7] 23/4 23/8 24/10 35/8 113/6 127/9 200/18</p> <p>convincing [1] 171/17</p> <p>Cooper [10] 91/11 95/4 139/12 144/23 147/5 147/15 152/1 152/21 182/7 182/24</p> <p>Cooper's [1] 153/13</p> <p>cooperative [2] 97/18 168/20</p> <p>copied [6] 13/23 29/9 129/14 139/10 144/11 145/24</p> <p>copies [5] 79/18 79/22 81/20 161/14 161/15</p> <p>copy [16] 1/23 84/14 85/18 87/2 87/18 90/3 91/22 91/24 93/3 101/1 120/10 159/25 201/16 207/19 208/12 210/2</p> <p>core [3] 164/5 164/23 203/18</p> <p>corporate [4] 17/10 34/6 34/8 102/10</p> <p>correct [17] 2/12 3/2 3/3 3/6 3/17 3/20 4/5 54/15 54/23 57/13 58/21 71/19 76/22 86/23 94/10 159/14 210/18</p> <p>correction [1] 2/16</p> <p>correctly [4] 76/1 121/22 148/2 163/20</p> <p>correspondence [1] 202/20</p> <p>corridor [2] 95/8 102/3</p> <p>corridors [1] 95/13</p> <p>cost [3] 99/24 154/6 169/15</p> <p>costs [1] 140/15</p> <p>could [105] 5/13 6/24 14/5 24/14 33/25 36/22 38/12 39/6 40/25 41/15 41/17 45/25 46/5 46/8 46/25 50/10 50/15 50/16 51/17 51/21 53/4 59/8 59/25 62/18 66/19 66/25 68/22 69/2 69/6 71/18 71/24 80/9 82/3 82/23 83/1 84/24</p>	<p>85/19 85/21 87/3 87/10 87/12 87/13 90/5 98/20 99/7 99/8 99/8 100/14 107/17 107/18 122/7 124/6 124/18 127/24 127/25 127/25 132/18 132/19 133/9 133/12 133/17 139/24 142/23 148/11 152/10 154/5 155/22 156/2 161/15 164/6 167/9 167/18 168/21 169/1 169/8 171/6 171/21 176/7 180/10 181/6 181/11 181/15 181/22 181/23 182/14 186/6 186/8 193/17 193/25 194/3 194/3 194/7 194/13 194/24 195/3 197/5 197/11 197/16 199/25 199/25 203/9 208/4 208/6 208/13 209/5</p> <p>couldn't [3] 137/5 157/2 193/18</p> <p>counsel [36] 20/10 34/11 47/6 47/8 47/24 48/2 48/8 48/20 51/2 52/10 52/12 52/17 66/17 67/1 73/18 77/19 78/17 80/6 94/1 101/10 110/22 114/17 114/20 114/25 115/8 115/18 116/12 127/15 127/18 128/6 128/15 134/1 136/25 138/6 202/3 205/20</p> <p>Counsel's [1] 121/3</p> <p>count [6] 154/3 205/12 205/12 205/23 205/25 206/4</p> <p>counter [1] 99/15</p> <p>counter-argument [1] 99/15</p> <p>counterbalancing [1] 102/16</p> <p>country [1] 28/23</p> <p>couple [6] 14/22 107/22 133/23 145/11 181/2 202/11</p> <p>course [28] 1/6 14/13 22/3 23/21 23/23 28/25 30/24 41/23 53/10 64/5 70/22 73/11 90/22 100/8 111/3 112/7 114/2 121/13 124/4 126/6 129/5 150/2 168/23 176/18 179/24 180/15 205/16 210/14</p> <p>court [14] 33/7 99/13 113/8 132/18 137/21 139/6 140/23 147/23 156/22 157/20 159/5</p>	<p>160/21 183/10 205/12</p> <p>court' [1] 140/12</p> <p>courts [3] 3/25 136/14 136/21</p> <p>cover [10] 19/6 19/17 50/11 110/24 131/22 134/9 135/5 190/23 202/21 207/9</p> <p>cover-up [2] 19/17 190/23</p> <p>covered [5] 55/24 194/11 199/16 199/17 203/2</p> <p>covering [3] 27/3 27/16 124/7</p> <p>create [1] 73/2</p> <p>created [2] 22/5 91/5</p> <p>creating [1] 28/12</p> <p>credibility [2] 158/3 182/13</p> <p>credible [2] 25/5 50/23</p> <p>credit [1] 74/16</p> <p>creditable [1] 35/14</p> <p>criminal [21] 2/3 2/7 2/10 2/10 23/4 23/8 24/10 28/16 32/20 33/7 43/25 48/4 59/16 73/22 127/9 166/3 173/23 174/15 182/14 204/2 209/3</p> <p>crisis [3] 5/15 187/20 191/19</p> <p>critical [9] 14/13 73/12 140/18 142/4 142/11 142/14 145/9 145/21 176/3</p> <p>critically [1] 209/10</p> <p>count [6] 154/3 205/12 205/12 205/23 205/25 206/4</p> <p>counter [1] 99/15</p> <p>counter-argument [1] 99/15</p> <p>counterbalancing [1] 102/16</p> <p>country [1] 28/23</p> <p>couple [6] 14/22 107/22 133/23 145/11 181/2 202/11</p> <p>course [28] 1/6 14/13 22/3 23/21 23/23 28/25 30/24 41/23 53/10 64/5 70/22 73/11 90/22 100/8 111/3 112/7 114/2 121/13 124/4 126/6 129/5 150/2 168/23 176/18 179/24 180/15 205/16 210/14</p> <p>court [14] 33/7 99/13 113/8 132/18 137/21 139/6 140/23 147/23 156/22 157/20 159/5</p> <p>160/21 183/10 205/12</p> <p>court' [1] 140/12</p> <p>courts [3] 3/25 136/14 136/21</p> <p>cover [10] 19/6 19/17 50/11 110/24 131/22 134/9 135/5 190/23 202/21 207/9</p> <p>cover-up [2] 19/17 190/23</p> <p>covered [5] 55/24 194/11 199/16 199/17 203/2</p> <p>covering [3] 27/3 27/16 124/7</p> <p>create [1] 73/2</p> <p>created [2] 22/5 91/5</p> <p>creating [1] 28/12</p> <p>credibility [2] 158/3 182/13</p> <p>credible [2] 25/5 50/23</p> <p>credit [1] 74/16</p> <p>creditable [1] 35/14</p> <p>criminal [21] 2/3 2/7 2/10 2/10 23/4 23/8 24/10 28/16 32/20 33/7 43/25 48/4 59/16 73/22 127/9 166/3 173/23 174/15 182/14 204/2 209/3</p> <p>crisis [3] 5/15 187/20 191/19</p> <p>critical [9] 14/13 73/12 140/18 142/4 142/11 142/14 145/9 145/21 176/3</p> <p>critically [1] 209/10</p> <p>count [6] 154/3 205/12 205/12 205/23 205/25 206/4</p> <p>counter [1] 99/15</p> <p>counter-argument [1] 99/15</p> <p>counterbalancing [1] 102/16</p> <p>country [1] 28/23</p> <p>couple [6] 14/22 107/22 133/23 145/11 181/2 202/11</p> <p>course [28] 1/6 14/13 22/3 23/21 23/23 28/25 30/24 41/23 53/10 64/5 70/22 73/11 90/22 100/8 111/3 112/7 114/2 121/13 124/4 126/6 129/5 150/2 168/23 176/18 179/24 180/15 205/16 210/14</p> <p>court [14] 33/7 99/13 113/8 132/18 137/21 139/6 140/23 147/23 156/22 157/20 159/5</p>

D	deciding [8] 43/14 45/20 114/18 115/23 116/4 122/12 140/17 153/10	Deloitte [9] 61/14 68/25 69/16 70/10 73/18 117/22 118/4 118/6 120/20	137/18 144/14 168/22 181/13 183/3	204/17
damage [2] 142/24 171/18	decision [24] 45/6 63/9 66/18 76/21 87/25 94/15 95/9 95/18 96/12 96/16 103/6 139/15 139/16 150/3 150/9 150/23 150/24 153/16 154/25 168/10 168/25 186/1 186/13 194/16	delve [1] 111/16	determining [5] 114/13 114/23 115/6 121/18 123/2	differ [1] 10/19
damaging [1] 180/7	decision-making [1] 94/15	demands [2] 175/24 176/24	develop [1] 10/4	difference [1] 185/5
damning [1] 152/24	decisively [1] 102/24	demonstrate [2] 37/24 107/1	developments [1] 10/13	different [40] 24/8 24/13 26/10 26/13 31/2 31/2 36/3 36/21 39/22 41/21 42/6 44/7 46/17 47/20 50/8 68/16 79/1 83/7 95/22 96/4 97/13 99/8 102/19 105/18 115/2 115/3 118/10 121/10 132/15 144/13 151/6 160/5 167/15 168/8 175/10 175/13 175/21 193/12 194/1 197/15
danger [1] 36/11	declining [1] 5/3	demonstrated [3] 28/11 148/1 148/11	devouring [1] 175/7	differentiate [1] 88/23
dash [1] 195/22	decisions [8] 63/18 118/2 118/5 144/19 153/8 160/5 168/22 197/22	demonstrates [1] 186/22	Dickinson [3] 21/14 61/15 117/9	differently [1] 100/5
data [4] 42/6 68/21 70/1 73/21	decode [1] 151/21	den [1] 61/14	dictated [1] 88/6	difficult [8] 7/15 7/19 8/18 10/14 26/19 102/6 127/22 151/21
data-driven [1] 68/21	deemed [1] 94/13	dense [1] 51/16	did [123] 6/18 6/19 11/25 12/2 13/4 14/14 18/24 24/19 25/2 26/23 30/20 32/22 33/10 33/11 33/12 35/22 39/1 39/11 40/1 40/2 40/4 44/11 44/13 44/14 45/20 48/4 49/15 49/16 49/16 49/18 59/1 60/6 60/7 60/17 60/20 60/23 65/4 65/25 68/3 69/13 70/14 70/17 70/18 70/21 71/5 72/4 73/6 76/25 80/21 81/7 81/25 82/5 82/10 82/14 82/14 83/8 83/12 87/4 87/13 87/15 88/3 89/9 89/25 92/13 93/22 103/17 104/11 105/14 107/10 108/8 111/24 114/18 115/17 116/3 119/7 121/25 127/3 127/10 132/2 136/6 136/23 143/9 144/1 144/21 153/10 153/22 155/11 155/12 155/12 162/9 165/1 166/22 167/1 168/11 168/14 172/2 172/18 179/22 180/19 182/17 183/11 183/20 192/8 192/11 192/21 193/7 193/16 195/12 196/10 196/13 196/13 199/12 201/16 202/22 203/14 205/24 206/18 206/24 207/8 208/10 209/8 209/15 210/1	difficulties [1] 199/22
dataset [2] 69/3 72/15	deep [1] 5/15	Department's [1] 153/14	digital [2] 69/20 70/11	difficultly [4] 18/5 82/15 197/20 205/16
date [3] 7/2 51/1 59/9	deeply [2] 171/2 171/2	departmental [2] 153/20 153/22	diligence [1] 8/23	direct [1] 83/8
dated [6] 6/6 9/5 85/5 91/12 103/8 182/4	defence [6] 125/1 157/20 205/25 206/1 206/1 206/2	dependent [2] 63/7 118/1	dire [3] 56/12 56/24 56/24	directing [1] 102/12
David [1] 148/18	defend [2] 35/19 129/18	depending [1] 67/16	direction [6] 129/7 170/11 179/13 194/2 194/14 198/3	direction [6] 129/7 170/11 179/13 194/2 194/14 198/3
Davies [6] 17/7 20/10 26/24 27/13 31/15 179/2	defendant [5] 62/7 63/10 63/12 63/14 159/2	depends [1] 107/14	directly [10] 42/21 47/16 67/8 80/7 83/12 100/21 134/25 145/23 153/8 157/4	director [5] 6/1 12/22 17/10 79/4 94/9
Davies' [1] 26/25	defendants [4] 73/22 158/13 158/17 158/19	describe [2] 30/10 166/16	directors [2] 10/20 155/23	directors [2] 10/20 155/23
day [17] 3/13 18/2 25/13 34/24 58/19 140/16 144/18 144/18 145/3 145/5 145/7 146/25 146/25 167/7 179/25 192/3 192/17	Defining [1] 37/8	described [4] 7/14 23/12 60/25 131/17	disagree [1] 111/19	disagree [1] 111/19
days [6] 57/9 105/2 105/7 105/12 106/7 107/22	definitely [3] 76/9 102/5 145/16	description [7] 32/7 88/23 120/17 131/4 133/24 156/17 182/18	disappointed [1] 102/1	disappointed [1] 102/1
de [7] 124/25 125/8 125/11 126/5 129/19 130/22 138/6	definitive [4] 33/3 60/11 185/12 187/2	designed [2] 20/2 49/3	disappointing [2] 134/20 140/25	disappointing [2] 134/20 140/25
de Garr [5] 124/25 125/8 126/5 129/19 138/6	definitively [1] 194/13	desire [4] 36/23 53/24 171/9 179/4	discharge [4] 86/9 117/23 122/12 155/24	discharge [4] 86/9 117/23 122/12 155/24
dead [3] 168/16 169/1 169/9	degree [2] 132/15 194/20	desired [1] 52/15	discharges [1] 117/18	discharges [1] 117/18
deal [9] 18/25 29/22 53/20 92/24 151/16 176/17 177/5 178/21 199/24	degrees [1] 5/10	desires [1] 37/20	disclosable [2] 85/21 110/16	disclosable [2] 85/21 110/16
dealing [8] 18/23 26/5 33/23 39/16 46/17 166/2 189/14 196/5	delay [2] 44/9 99/24	desk [3] 76/24 195/17 197/4	disclose [5] 103/6 133/13 157/25 158/16 159/3	disclose [5] 103/6 133/13 157/25 158/16 159/3
dealings [1] 184/9	delayed [1] 152/16	despite [4] 173/23 205/16 206/6 206/7	disclosed [8] 63/15 73/21 76/15 84/24 103/20 158/13 158/13 158/18	disclosed [8] 63/15 73/21 76/15 84/24 103/20 158/13 158/13 158/18
deals [8] 4/15 18/2 23/23 26/4 192/2 192/16 199/1 204/23	delaying [1] 177/4	destroyed [1] 21/24	disclosing [1] 83/10	disclosing [1] 83/10
dealt [5] 26/22 140/8 140/15 147/9 175/5	delegate [1] 114/18	destroying [1] 21/20	disclosure [7] 63/22 64/14 73/24 158/20	disclosure [7] 63/22 64/14 73/24 158/20
Dear [3] 42/23 51/18 100/23	delegated [3] 114/16 114/25 115/21	destruction [1] 21/18		
death [1] 191/18	delete [2] 73/2 73/20	detail [10] 10/16 18/14 19/20 101/23 112/14 113/15 138/23 155/14 159/8 177/6		
debate [3] 98/14 115/25 122/18	deliberate [2] 19/16 190/23	detailed [3] 2/20 30/7 210/13		
deceived [1] 56/10	deliberately [2] 104/12 183/1	determination [3] 122/1 173/10 200/6		
December [3] 54/5 54/10 55/13	deliver [6] 10/11 35/7 35/24 36/6 60/10 174/10	determinations [1] 180/20		
decide [4] 118/17 119/16 120/23 199/14	delivered [1] 35/18	determine [5] 29/3 48/13 49/2 86/11 115/12		
decided [4] 139/19 147/3 169/4 196/20	delivering [1] 174/23	determined [9] 60/5 98/21 99/11 99/24		

D	distributed [1] 84/22	143/21 160/3 182/2	169/18	154/11 156/19 161/6
disclosure... [3] 158/24 160/24 207/10	distribution [1] 84/14	182/2 203/12	doubt [5] 13/1 40/7 97/9 123/12 206/2	165/10 166/23 167/5
discontinued [3] 134/2 135/13 138/7	divided [2] 38/24 59/13	does [27] 24/23 24/23 25/1 29/13	down [43] 3/11 9/10 17/1 37/6 40/16 40/21	167/16 175/17 177/10
discover [2] 65/20 199/2	do [143] 1/24 2/1 2/2 2/5 5/18 9/9 14/20	49/10 54/15 55/10 56/1 67/12 70/2 75/7	45/3 48/18 59/9 65/20	180/14 181/17 187/7
discovered [2] 31/8 203/21	16/4 16/11 16/15 17/7 17/9 18/22 18/23 19/5	77/12 77/16 94/13 101/16 110/11 119/1	68/17 85/13 87/9 91/20 92/20 104/3	189/11 193/24 197/7
discrepancies [3] 72/16 74/22 75/4	30/6 30/8 30/25 31/6 31/7 33/12 33/14	123/4 123/19 137/15 141/10 141/11 145/24	106/16 123/23 126/2 132/6 134/10 147/23	197/14 200/3 209/19
discrepancy [1] 67/20	33/15 33/25 34/3 34/9 34/13 34/17 37/4 37/9	157/18 167/19 174/4 204/16	151/20 152/7 160/9 160/11 160/18 160/23	earliest [4] 29/3 161/2 162/5 162/22
discretion [3] 38/3 139/21 139/21	37/14 38/20 38/24 40/10 40/11 40/23	doesn't [9] 13/13 46/9 77/14 77/15	164/14 166/11 166/12 169/17 169/18 170/1	earth [1] 178/11
discuss [11] 91/17 96/11 97/9 101/23	44/20 44/22 53/3 53/6 54/4 55/5 56/13 56/21	86/24 89/16 101/15 107/15 138/18	170/7 172/13 180/11 190/7 191/24 195/19	easily [1] 181/11
111/24 125/14 126/6 126/20 135/19 136/3 152/9	57/14 57/24 58/2 58/4 58/6 58/7 58/12 64/7	dog [3] 170/12 170/13 170/14	195/20 197/18 198/4	easy [7] 7/20 50/14 104/14 104/24 171/23
discussed [13] 16/1 16/9 71/15 75/8 79/2	65/12 70/3 71/24 83/13 86/3 88/1 91/16	doing [17] 8/22 18/4 23/25 29/1 45/1 58/16	downside [1] 149/23	173/10 209/21
85/3 85/14 97/12 111/21 115/1 116/15 185/19 194/9	95/23 96/16 97/3 98/18 100/19 102/25	90/5 99/14 104/16 110/6 121/14 123/8	draft [9] 17/13 23/10 35/3 60/16 106/23	effect [12] 56/15 61/25 115/5 124/18
discussing [4] 91/10 127/24 179/11 187/11	104/16 104/17 109/1 121/4 121/21 121/22	123/14 127/20 129/10 134/18 188/2	110/20 117/13 119/2 147/25	132/4 132/23 133/20
discussion [21] 21/18 60/12 60/15	122/9 122/16 128/2 128/2 128/3 128/25	don't [68] 5/14 5/20 8/25 15/10 16/8 16/14	drafted [5] 20/20 26/23 27/7 31/16	147/4 158/10 171/15
65/17 82/1 85/1 88/12	129/11 130/1 130/2 130/10 131/14 131/17	34/18 40/2 45/25 47/19 54/6 56/18	110/19	205/17 205/18
89/4 95/5 95/6 96/24	132/14 134/11 137/21 142/15 145/22 150/13	56/19 57/5 57/11 58/2 58/5 60/12 65/16	drafting [1] 20/8	effective [6] 82/1 102/10 105/4 105/17
100/19 105/3 108/11	151/12 152/12 154/10 154/22 159/18 163/4	70/16 70/16 70/21 79/20 87/13 87/14	draw [3] 38/21 128/4 160/4	105/22 175/17
125/24 126/7 136/4	165/19 165/21 166/6 166/17 168/5 169/21	88/4 93/2 95/21 96/22 106/6 109/1 119/11	drawing [1] 116/24	effectively [10] 25/20
146/9 155/4 171/3 207/1	170/2 170/7 171/4 171/6 174/6 175/18	123/13 123/14 125/6 142/8 143/12 143/20	drawn [3] 24/2 42/2 112/21	64/16 65/20 81/13
discussions [8] 8/19 32/9 39/10 110/18	175/18 175/21 176/5 176/10 178/21 179/7	146/6 146/12 156/9 159/12 170/16 171/20	draws [2] 29/10 67/18	93/24 121/5 122/8
184/15 185/22 186/20 186/23	182/8 182/8 182/14 183/5 184/16 185/13	171/21 172/19 172/20 174/9 176/15 178/23	drill [1] 1/10	173/23 183/2 189/7
dishonest [1] 166/20	185/15 187/9 189/2 193/19 194/20 195/1	181/1 182/16 182/21 182/23 183/3 183/21	driven [2] 68/21 179/13	effectiveness [1] 176/9
dishonestly [1] 19/6	195/2 195/4 195/15 195/19 197/1 197/5	186/8 186/25 193/13 193/17 194/24 195/7	driving [3] 5/5 117/2 124/21	effects [1] 157/23
dishonesty [2] 63/5 166/21	197/11 197/24 199/7 199/14 201/7 201/16	195/17 195/18 198/9 198/12 202/25 209/21	drop [1] 205/23	efficient [2] 18/1 23/7
disk [1] 79/19	208/15 208/16 209/20 208/15 208/16 209/20	done [38] 5/20 14/10 15/10 41/2 42/11	dropped [2] 62/2 66/23	effort [2] 163/7 172/25
dislike [1] 141/15	document [21] 23/11 49/18 58/23 79/17	46/20 47/9 61/7 61/8 64/23 66/10 75/23	dropping [1] 206/4	efforts [2] 141/10 163/25
dismissed [1] 63/16	80/3 80/12 85/20 86/18 87/23 88/8	83/20 100/4 101/4 112/23 120/19 128/1	due [4] 8/22 13/19 19/18 98/17	eg [4] 35/20 37/16 38/3 41/13
disposal [2] 174/9 206/14	89/12 92/2 146/10 146/21 148/3 182/16	146/4 167/1 169/23 171/3 171/19 173/13	during [2] 141/3 210/14	eg that [1] 35/20
disposed [2] 15/14 145/10	187/6 187/9 187/15 206/14 206/23	181/6 182/9 193/17 193/18 194/8 194/13	dust [1] 130/23	eg they [1] 38/3
disproportionate [1] 96/8	documentation [1] 61/11	194/24 197/2 197/9 199/19 200/1 204/15	duties [2] 155/25 209/2	eight [14] 107/13 107/13 108/22 109/9
dispute [1] 92/12	documented [1] 62/25	208/5 208/14	each [9] 38/17 43/9 112/9 112/11 120/16	114/12 115/16 123/8
disputed [1] 140/7	documents [14] 62/17 62/24 69/16	door [1] 153/3	122/25 140/1 141/13 168/24	124/17 202/15 202/24
dissatisfaction [1] 180/19	79/11 91/4 91/19 91/21 92/20 143/17	double [2] 118/17 198/16	156/7 156/9 156/15 157/19 157/22 158/2	203/3 203/8 204/6
dissect [1] 50/15		doubled [1] 169/25	158/14	204/14
distance [2] 156/8 174/16		doubling [2] 169/17		204/14
distinction [3] 42/2 89/3 89/4				eight/nine [1] 107/13
distorted [1] 151/11				eighth [1] 97/8
distracting [1] 175/9				either [11] 32/14 70/18 72/2 87/16

E	12/2	182/13	65/3 66/13 119/12	189/11 193/4 197/7
email [33] 5/24 13/23 27/3 27/16 27/25 34/2 42/20 44/5 85/4 91/11 94/3 95/25 116/19 120/3 120/7 120/7 120/14 121/16 122/21 123/24 125/20 125/23 125/24 126/3 129/16 136/4 137/3 139/9 143/13 146/7 147/14 151/22 177/17	enquiry [3] 43/12 43/14 44/11	even-handed [1] 142/12	150/25 153/24 167/21 169/3 173/19 185/17 200/25	203/18
emails [11] 5/21 13/12 13/13 55/13 100/19 121/7 176/19 177/6 177/7 177/8 177/11	ensued [2] 98/14 171/3	evening [2] 139/15 152/9	exceeds [1] 195/10	explained [17] 52/23 53/24 64/2 77/5 85/2 90/17 96/14 116/8 132/22 133/4 133/19 136/16 136/18 136/21 137/23 138/4 209/19
emanated [1] 187/12	ensure [5] 29/5 36/23 102/11 103/2 155/16	event [8] 34/20 40/5 40/6 53/21 72/8 124/23 137/11 159/11	excels [1] 192/6	explaining [1] 134/21
emerged [2] 17/24 18/17	ensured [1] 101/22	events [11] 13/10 25/10 47/17 59/3 95/20 151/10 160/7 170/4 173/2 173/9 179/10	exceptional [1] 205/15	explains [1] 139/2
emphasis [1] 50/3	enter [1] 181/8	eventual [1] 57/21	exchange [4] 13/23 27/25 34/2 144/10	explanation [2] 90/8 175/23
employee [2] 32/19 156/21	entirely [11] 44/7 63/9 92/13 92/15 93/2 95/3 194/6 194/15 194/22 195/18 198/24	ever [11] 20/17 24/4 39/1 136/16 136/21 137/11 138/8 165/2 167/24 206/2 210/2	excited [1] 154/15	explore [1] 118/3
employees [1] 75/14	entitled [4] 38/10 39/18 158/19 192/25	every [12] 18/2 18/13 19/21 25/24 58/19 59/6 66/12 123/16 154/2 177/16 192/3 192/17	exclusively [3] 45/12 45/18 45/23	exposure [1] 175/12
employment [2] 24/16 165/13	envisage [1] 102/6	everybody [2] 173/4 205/9	excursions [1] 139/6	express [7] 70/8 74/24 154/11 171/14 172/1 180/14 182/23
empowered [4] 134/6 135/2 135/10 135/11	envisaged [3] 52/19 77/3 77/6	everything [3] 7/18 42/12 57/12	Exec [2] 3/12 12/21	expressed [4] 7/1 8/23 8/25 63/23
enable [1] 62/3	error [6] 94/18 94/23 95/10 97/4 106/8 176/4	evidence [39] 17/24 18/17 19/2 19/24 23/6 33/4 61/19 62/10 62/19 62/22 63/15 63/19 64/1 64/6 64/13 75/16 89/18 93/8 117/14 121/8 123/9 139/17 139/24 140/8 141/11 142/23 145/13 148/8 156/21 157/14 158/2 158/7 166/5 184/19 188/12 196/17 201/24 205/20 205/22	executive [17] 3/10 6/2 7/23 9/5 9/19 11/6 13/6 13/23 22/17 39/17 42/21 44/24 103/17 106/12 153/17 172/17 184/11	expressing [2] 119/5 121/12
encourage [2] 43/23 102/24	errors [2] 69/4 199/2	everyone [1] 97/24	Executive's [1] 11/6	expression [2] 170/23 175/8
end [16] 7/24 45/19 59/20 100/2 103/14 124/14 132/3 141/14 143/2 145/14 151/11 172/10 179/25 180/20 181/13 184/14	escalate [2] 144/19 146/25	everyday [1] 97/24	executives [7] 27/12 58/24 130/4 144/8 144/10 144/17 146/24 118/10 118/18 119/17 137/12	extemporary [1] 99/5
endeavour [1] 146/11	escape [3] 180/12 181/19 185/21	everything [3] 7/18 42/12 57/12	exercise [8] 33/17 63/23 64/11 69/1 118/10 118/18 119/17 137/12	extend [2] 118/18 119/16
ended [9] 45/13 115/1 136/23 165/2 167/22 168/21 169/3 181/15 200/1	especially [3] 23/18 105/23 119/9	evidence [39] 17/24 18/17 19/2 19/24 23/6 33/4 61/19 62/10 62/19 62/22 63/15 63/19 64/1 64/6 64/13 75/16 89/18 93/8 117/14 121/8 123/9 139/17 139/24 140/8 141/11 142/23 145/13 148/8 156/21 157/14 158/2 158/7 166/5 184/19 188/12 196/17 201/24 205/20 205/22	exercises [7] 27/12 58/24 130/4 144/8 144/10 144/17 146/24	extensive [2] 2/3 99/5
endorsing [1] 56/11	essentially [29] 6/4 8/21 8/22 14/18 42/17 53/6 60/7 71/10 72/6 80/5 84/23 92/9 95/18 102/3 112/3 117/2 124/7 124/21 125/5 133/22 135/8 153/18 160/24 163/8 177/18 185/1 186/3 192/23 193/2	evient [1] 26/9	exercised [1] 88/13	extensively [1] 194/9
endpoint [1] 103/4	establish [3] 10/6 67/2 178/11	evidential [3] 19/4 66/24 67/4	existence [9] 69/18 92/23 93/10 93/14 93/16 93/20 118/7 158/18 159/6	extent [14] 39/17 69/25 75/4 83/4 87/6 107/6 112/9 114/14 116/4 117/22 123/3 124/17 134/25 200/4
ends [1] 178/10	established [3] 139/23 196/17 196/19	exact [2] 133/24 134/2	existing [2] 35/15 70/2	external [7] 18/15 21/13 21/21 69/5 73/18 117/9 136/24
energetic [1] 106/4	estimate [1] 184/22	exactly [22] 16/20 21/6 22/9 33/2 34/21 90/10 98/5 111/1 115/22 120/13 123/13 125/9 143/21 146/3 150/25 151/21 155/14 159/16 168/18 179/22 187/5 196/16	expect [8] 11/4 19/20 19/25 28/25 125/12 134/21 140/14 174/9	extracts [1] 148/19
engaged [3] 19/11 190/5 196/4	estimated [1] 140/16	exam [2] 37/13 41/15	expectation [2] 43/23 44/1	extreme [1] 171/14
engaging [1] 39/10	et [6] 38/5 143/15 143/15 152/16 177/16 196/2	examination [1] 67/25	expected [4] 69/2 81/5 120/18 208/15	extremely [1] 140/24
enjoy [1] 84/13	et cetera [5] 38/5 143/15 143/15 177/16 196/2	examine [1] 9/18	expenditure [1] 137/6	eye [1] 194/10
enjoyed [5] 80/19 83/9 88/12 88/18 88/19	etc [1] 15/24	examined [2] 45/23 46/10	expensive [1] 203/25	eyes [2] 15/22 179/18
enjoys [1] 89/7	evaluate [1] 151/10	examining [1] 42/7	experience [9] 2/3 6/19 12/13 33/23 46/16 46/19 82/19 105/17 127/14	
enormous [5] 12/25 18/9 176/23 198/25 203/13	evaporate [1] 163/11	example [11] 39/10	experienced [2] 50/5 73/14	
enough [7] 39/14 106/2 166/24 175/2 178/7 178/9 182/16	even [9] 33/6 38/22 100/4 122/22 133/9 141/11 142/12 172/3		expert [6] 72/25 157/14 158/1 158/2 158/3 158/6	
enquiries [2] 5/17			expertise [1] 112/19	
			experts [2] 128/1 168/10	
			explain [11] 67/19 75/3 105/15 167/16 175/17 177/10 188/22	
				fact-specific [1]

F	features [3] 118/16 119/15 119/16 February [7] 9/5 53/23 59/9 106/20 109/18 119/3 162/2 feel [13] 6/18 18/8 40/1 40/2 76/2 97/3 134/6 135/2 135/10 151/12 171/18 173/13 181/3 feeling [2] 10/3 12/23 feels [2] 130/7 134/8 fell [2] 87/4 87/25 fellow [2] 83/16 83/17 felt [29] 5/12 6/21 7/14 7/20 8/8 8/15 8/17 27/9 30/23 37/4 39/4 41/9 42/14 64/21 81/11 82/4 87/22 90/13 112/1 124/24 130/11 142/23 153/7 156/11 169/21 172/15 197/17 199/16 205/22 few [10] 12/21 24/1 31/3 31/7 39/8 65/20 107/25 120/12 139/5 183/19 fight [1] 169/12 figure [1] 186/24 figures [4] 5/18 7/2 23/1 186/16 file [3] 62/17 67/2 205/13 files [3] 64/5 75/15 202/15 fill [1] 171/19 final [16] 22/8 22/9 32/15 51/7 51/24 55/24 56/9 56/17 85/5 106/19 109/5 109/18 119/2 137/18 156/3 182/1 finally [4] 51/12 89/6 102/17 183/5 finance [1] 8/1 finances [1] 7/11 financial [2] 199/5 199/11 financing [1] 7/16 find [17] 22/13 33/13 33/14 36/16 37/3 54/1 62/18 97/20 111/5 121/13 137/19 163/16 163/18 171/13 176/11 188/4 194/25 finding [1] 36/8 findings [17] 35/6 36/5 36/7 36/9 79/6 79/8 101/6 101/23 110/4 111/8 111/9 111/18 112/8 112/10 118/18 148/5 149/25 fine [5] 31/6 42/13	89/24 97/3 200/12 finessed [1] 111/12 fingertips [1] 146/13 finish [2] 80/9 192/25 fire [2] 1/10 8/11 firm [3] 117/9 129/17 157/8 first [34] 17/13 20/20 32/22 33/24 39/19 41/12 46/9 53/9 69/17 97/6 103/20 104/1 104/2 104/9 107/25 111/7 116/25 124/20 125/2 125/6 130/21 139/6 140/16 154/2 154/24 159/6 165/1 168/1 174/7 174/23 196/18 202/14 205/17 208/19 Firstly [4] 94/22 108/8 139/5 152/17 five [5] 60/2 60/13 95/15 95/16 162/16 five years [1] 162/16 flag [1] 204/8 flagged [2] 124/2 147/16 flaws [1] 49/1 flippant [1] 208/24 flowed [1] 88/7 focus [1] 45/1 focused [1] 68/11 focuses [1] 49/8 focusing [2] 19/23 26/13 FOIA [1] 133/18 follow [10] 92/24 93/14 93/17 93/18 94/20 94/24 130/8 130/12 194/25 200/23 follow-on [1] 194/25 follow-up [7] 92/24 93/14 93/17 93/18 94/20 94/24 200/23 followed [6] 83/21 86/6 91/25 97/8 97/10 110/12 following [14] 7/6 28/4 43/3 54/19 61/1 62/8 66/22 79/10 85/8 91/21 92/20 99/3 148/1 201/10 follows [1] 112/3 food [1] 165/4 foot [12] 15/16 20/8 34/2 47/13 67/11 120/3 135/18 139/8 145/2 151/20 151/24 157/7 force [2] 96/6 96/20 forceful [1] 56/2 forces [1] 50/2 forensic [7] 18/11 43/6 58/21 75/1	195/24 196/8 196/14 forever [1] 180/21 forgive [1] 175/8 form [8] 8/20 33/17 43/24 48/22 84/23 121/8 126/17 134/3 formal [6] 11/21 95/13 95/17 96/15 96/24 109/13 formally [1] 14/21 formed [4] 15/9 30/8 144/6 156/6 former [3] 22/25 38/16 43/7 formulated [1] 76/15 formulating [1] 136/7 forth [1] 26/7 fortnight [2] 34/20 34/21 fortnightly [1] 116/20 fortuitously [1] 165/24 forum [1] 172/5 forward [28] 18/22 20/7 29/6 57/11 59/19 66/8 66/8 69/14 75/11 77/25 81/2 85/12 91/16 93/25 107/1 114/19 114/22 114/24 115/7 116/2 116/10 117/3 120/17 125/15 126/2 127/21 134/19 135/16 forwards [25] 9/23 16/25 21/9 42/18 52/8 59/10 61/16 74/10 100/16 106/15 108/23 114/15 115/10 115/17 115/24 116/5 116/6 120/2 120/7 121/19 127/12 129/12 145/2 147/11 151/19 forwards a [1] 42/18 found [3] 39/21 108/6 121/24 foundation [1] 66/11 founded [1] 75/17 four [12] 4/4 6/8 45/14 59/20 79/18 79/22 81/20 81/23 87/17 112/7 120/23 207/18 four years [1] 4/4 fourth [3] 19/8 189/21 190/9 frame [5] 12/12 26/19 46/22 52/15 150/23 framed [3] 51/3 51/23 155/15 framing [1] 45/10 frankly [1] 130/18 Fraser [4] 148/10 149/24 150/14 168/11 fraught [1] 205/15	Freedom [5] 84/19 84/25 85/22 110/16 161/10 frequency [1] 151/9 frequent [1] 31/8 fresh [2] 15/22 16/12 front [3] 1/23 12/17 130/2 frontally [1] 102/19 fruitless [1] 137/4 frustrated [1] 118/24 frustrates [1] 137/16 frustration [2] 118/22 120/4 frustrations [1] 199/22 Fujitsu [18] 30/6 32/19 61/14 67/18 67/25 68/2 68/3 68/18 69/19 69/21 70/19 71/5 73/1 156/21 157/14 158/9 197/5 199/7 Fujitsu's [2] 69/22 73/20 full [11] 1/18 62/6 70/4 72/19 72/25 79/12 79/13 83/25 89/1 98/11 210/13 fully [1] 97/12 function [4] 34/17 122/11 178/7 178/9 functionality [2] 69/22 70/4 Fundamentally [1] 187/22 funding [1] 113/9 funnily [1] 182/16 funny [2] 151/2 203/11 further [36] 14/7 29/4 35/21 40/18 48/13 52/16 59/8 59/24 61/4 61/9 65/11 67/24 79/9 86/2 96/13 110/2 112/25 117/21 118/1 118/3 118/5 122/24 123/2 124/5 126/3 134/5 145/7 147/17 149/16 150/5 158/23 160/18 190/7 195/20 200/10 201/23 fuss [1] 45/2 future [2] 29/7 86/15
			G	
			gained [1] 62/15 game [2] 172/10 172/15 gap [1] 171/20 gaps [1] 61/8 Gareth [3] 32/19 156/21 159/7 Garr [7] 124/25 125/8	

<p>G</p> <p>Garr... [5] 125/11 126/5 129/19 130/22 138/6</p> <p>gave [8] 55/22 56/3 78/16 123/5 176/6 176/7 181/4 198/12</p> <p>Gavin [1] 152/2</p> <p>GC [1] 81/1</p> <p>GC's [1] 81/24</p> <p>general [38] 4/6 9/15 10/3 11/11 20/10 30/13 30/18 31/13 31/24 34/11 36/21 47/24 48/19 50/7 52/12 68/13 75/2 77/19 78/17 80/6 94/1 101/10 110/22 114/16 114/19 114/25 115/8 115/18 116/12 121/3 123/6 127/18 128/6 128/15 164/25 175/5 176/10 202/3</p> <p>generalised [1] 31/20</p> <p>generally [4] 15/13 39/23 77/22 110/17</p> <p>generic [1] 67/14</p> <p>genesis [1] 17/2</p> <p>gentlemen [1] 56/14</p> <p>genuine [4] 36/23 170/23 171/13 179/4</p> <p>get [46] 12/25 18/10 22/8 22/9 30/20 33/11 45/21 53/4 54/13 66/3 70/25 71/10 71/13 71/16 71/18 72/4 80/24 80/25 100/1 105/3 118/23 121/7 128/2 131/20 134/21 136/5 142/2 149/4 151/17 153/7 154/3 154/13 162/20 166/11 171/15 172/12 176/25 177/17 178/5 179/3 180/17 181/22 184/14 187/9 196/13 197/11</p> <p>gets [2] 73/12 160/9</p> <p>getting [12] 7/5 7/12 20/15 47/22 61/16 134/24 135/14 137/20 153/20 198/3 198/10 203/24</p> <p>gist [1] 162/20</p> <p>give [24] 6/19 9/12 29/2 40/13 60/13 87/18 88/23 96/22 99/5 128/12 128/24 130/18 131/20 134/4 140/11 150/10 152/20 158/7 163/2 164/1 171/9 177/20 185/12 187/2</p>	<p>given [25] 14/18 25/8 38/8 39/24 40/8 90/8 90/14 100/13 101/17 122/22 127/7 132/18 139/25 140/25 150/11 162/24 196/20 207/5 207/9 207/19 209/11 209/14 209/14 209/18 209/25</p> <p>gives [1] 107/19</p> <p>giving [3] 129/9 156/21 184/19</p> <p>glad [1] 200/22</p> <p>glimmer [1] 124/20</p> <p>glitches [1] 199/2</p> <p>GLO [7] 97/19 97/24 169/20 176/4 180/10 180/17 180/18</p> <p>go [77] 2/13 8/17 9/23 13/11 13/20 15/16 17/1 19/20 20/7 20/20 21/9 21/17 25/17 29/10 38/22 40/9 40/12 40/14 42/1 48/10 53/6 58/6 59/6 59/10 59/19 60/24 61/16 65/11 69/14 74/10 75/10 75/18 77/2 96/18 98/18 103/16 104/1 106/10 106/15 112/6 112/11 112/13 113/22 118/20 120/2 120/24 122/12 122/16 125/7 126/2 129/13 135/12 135/17 140/20 151/19 151/24 152/5 157/6 157/13 172/6 173/19 175/4 176/10 178/10 187/6 187/7 187/8 188/1 189/20 189/22 190/8 191/20 192/14 194/19 197/18 203/7 206/17</p> <p>goes [11] 58/8 110/14 140/8 148/7 152/5 170/11 183/15 190/17 195/9 195/25 206/11</p> <p>going [99] 1/11 2/22 4/19 7/9 7/20 8/17 14/3 15/5 16/3 16/11 17/6 27/19 29/24 30/2 30/3 38/24 39/2 44/25 45/2 45/20 47/12 47/21 49/12 49/21 50/7 52/25 55/15 55/16 57/20 57/24 59/6 61/21 64/25 66/10 76/16 79/21 80/16 82/22 85/11 87/22 89/20 92/1 93/6 100/4 104/19 106/11 107/20 112/11 112/15 114/22 115/10 115/17</p>	<p>119/24 121/9 122/19 122/23 123/11 131/8 131/11 134/16 136/11 138/20 138/24 144/8 145/22 151/21 165/24 166/16 167/3 167/4 167/11 168/3 171/8 173/19 175/13 175/16 176/1 176/1 176/12 176/17 177/20 178/3 178/14 179/1 183/24 186/1 186/13 186/17 187/6 188/4 188/9 188/10 193/5 201/24 203/8 204/7 205/3 206/12 206/13</p> <p>gone [7] 18/9 31/21 98/6 193/12 197/5 197/9 199/21</p> <p>good [35] 1/3 1/15 6/19 10/6 40/9 47/1 50/7 50/10 53/16 65/8 65/10 65/18 65/19 76/4 91/1 97/6 104/11 111/22 111/23 113/21 114/8 121/4 123/21 128/6 128/11 129/10 134/22 134/22 134/23 161/12 164/12 171/21 197/17 209/15 209/25</p> <p>gospel [1] 123/17</p> <p>got [60] 12/13 16/19 23/25 24/22 27/11 31/9 31/11 33/22 39/22 47/11 55/13 57/10 66/4 72/3 77/5 77/18 78/9 80/4 80/23 84/22 90/12 90/16 95/20 95/22 95/23 98/3 98/7 98/9 98/12 100/13 121/23 128/5 133/22 135/7 147/5 153/25 154/17 156/10 159/9 160/11 169/13 169/16 169/25 170/14 171/5 171/7 171/23 174/7 174/8 175/4 175/10 175/12 180/14 181/2 181/20 191/3 193/14 195/21 197/1 206/14</p> <p>governance [3] 92/5 92/8 102/11</p> <p>government [35] 5/5 6/21 7/17 7/21 8/1 8/4 10/12 13/5 16/12 16/22 28/6 28/10 28/19 28/21 32/2 32/4 43/24 44/1 84/15 89/10 90/3 98/7 103/5 103/19 112/10 112/15 144/21 153/10 166/1 184/12 186/5 186/10 186/13 186/17 209/16</p>	<p>Grabiner [2] 150/6 155/7</p> <p>Grabiner's [1] 155/7</p> <p>gradually [1] 179/5</p> <p>grapple [1] 178/15</p> <p>grappled [1] 177/24</p> <p>grass [1] 104/13</p> <p>grateful [4] 6/24 43/2 205/6 210/14</p> <p>great [1] 199/24</p> <p>greater [2] 68/7 133/1</p> <p>greatly [1] 50/5</p> <p>green [1] 199/18</p> <p>grievances [1] 102/20</p> <p>grind [2] 83/18 179/5</p> <p>grip [1] 176/25</p> <p>grips [2] 198/4 198/10</p> <p>gritty [1] 198/4</p> <p>grooming [1] 179/2</p> <p>ground [3] 124/8 149/3 159/4</p> <p>grounded [3] 74/6 75/8 75/9</p> <p>grounds [9] 78/25 139/20 147/18 147/19 148/1 148/5 148/11 150/18 151/18</p> <p>group [13] 18/8 33/6 43/8 50/10 81/22 99/10 99/20 129/22 129/24 132/2 138/22 143/11 184/6</p> <p>grown [1] 190/19</p> <p>guarded [1] 133/9</p> <p>guided [1] 61/3</p> <p>guilty [8] 62/1 62/8 63/10 64/17 64/21 66/21 172/5 206/7</p> <p>guilty/liable [1] 172/5</p> <p>guns [1] 14/11</p> <p>gut [1] 151/12</p> <p>guy [1] 162/18</p> <p>guys [4] 55/12 57/10 134/17 145/22</p>	<p>10/2 10/9 21/16 39/4 77/6</p> <p>handed [2] 142/12 178/1</p> <p>handing [1] 113/23</p> <p>handle [4] 27/11 30/9 44/20 178/3</p> <p>handled [3] 92/16 97/18 98/20</p> <p>handlers [1] 75/14</p> <p>handling [7] 48/24 74/15 92/11 94/16 102/20 107/2 109/24</p> <p>handover [3] 11/16 11/18 11/22</p> <p>hands [3] 84/22 110/15 197/2</p> <p>hang [4] 191/13 199/12 203/16 204/13</p> <p>happen [4] 81/5 82/9 162/9 179/22</p> <p>happened [24] 13/11 25/3 25/10 40/7 53/21 53/21 57/15 89/15 97/23 98/6 106/1 125/10 143/24 145/23 145/25 146/4 156/17 163/5 163/13 167/24 168/24 179/19 180/5 185/22</p> <p>happening [5] 16/1 91/18 100/18 124/20 163/11</p> <p>happens [4] 20/5 24/4 29/5 153/15</p> <p>happy [7] 6/17 14/11 15/23 15/24 112/1 113/17 125/14</p> <p>hard [11] 1/23 27/9 31/19 79/19 143/17 160/4 171/12 171/13 172/6 185/11 206/11</p> <p>hardworking [1] 165/3</p> <p>has [103] 4/9 4/13 4/15 10/6 10/8 10/15 10/17 10/19 10/21 12/6 17/15 17/17 17/24 17/25 18/3 18/6 18/9 18/17 18/20 19/10 19/11 19/12 19/23 20/13 21/21 21/24 22/23 23/5 23/6 23/8 33/22 37/9 37/25 40/7 40/22 48/16 50/24 54/8 57/1 57/6 60/3 61/5 61/7 61/22 62/13 62/15 64/2 64/11 64/16 69/25 70/9 70/22 73/24 74/12 78/24 84/4 86/4 94/12 95/3 96/1 97/16 98/3 98/21 98/25 99/6 102/19 113/11 117/10</p>
--	---	--	---	---

H				
has... [35] 118/14 119/14 125/13 125/14 130/6 130/7 137/17 139/12 139/20 143/23 145/24 146/7 148/2 148/21 148/23 148/25 149/4 157/19 158/6 158/10 158/24 161/21 161/22 163/17 163/19 171/18 173/5 179/15 192/3 192/17 193/12 199/1 199/20 200/7 208/14	89/20 91/1 114/8 164/12 200/22 heard [4] 57/9 58/5 103/11 131/25 hearing [4] 29/6 100/25 139/13 210/23 hearings [1] 141/3 heavily [1] 18/24 held [12] 10/23 11/13 18/11 55/20 58/9 78/2 78/7 79/23 81/22 149/6 150/23 160/13 help [13] 5/13 7/23 11/23 12/12 12/16 35/19 46/13 47/1 54/13 54/22 56/4 184/18 204/16 helpful [4] 29/21 63/3 120/15 145/16 Helpline [2] 117/6 117/7 helplines [1] 26/20 helps [1] 175/1 Henderson [4] 54/4 54/19 55/2 55/21 Henry [10] 164/18 164/21 170/3 174/9 174/18 175/1 176/7 177/23 184/3 211/6 her [33] 3/24 6/16 6/20 11/20 12/3 12/4 12/24 14/5 14/5 14/15 14/15 34/9 42/21 43/13 54/20 63/15 78/20 79/15 79/24 81/2 87/13 87/16 87/18 93/8 115/19 115/21 117/2 173/23 173/23 174/14 174/15 205/19 206/6 here [34] 4/20 10/25 11/13 23/23 31/3 33/20 36/3 39/6 39/14 44/22 50/2 51/16 72/6 80/22 95/11 96/22 106/1 116/20 116/25 122/4 122/15 123/11 123/12 131/17 143/25 154/9 162/23 174/22 178/5 181/24 182/24 189/25 205/11 208/24 here's [4] 23/18 60/13 66/2 179/21 hermetically [1] 180/11 hers [1] 10/19 herself [1] 127/18 Hey [2] 95/8 131/19 hide [2] 80/1 104/12 hiding [1] 83/15 high [6] 37/21 112/23 139/22 151/23 152/4 183/10 higher [5] 136/14	136/20 153/1 160/9 160/9 highest [2] 107/1 147/24 highlight [3] 170/9 191/21 191/22 highlighted [2] 61/6 110/14 highly [1] 205/14 him [30] 14/3 14/8 14/9 15/22 17/8 20/15 27/1 34/4 34/13 51/2 51/10 51/15 54/13 55/3 55/22 56/3 63/15 78/24 79/3 92/11 96/10 125/8 126/7 141/20 143/4 148/11 150/4 155/12 158/1 208/15 himself [9] 52/20 92/16 147/18 148/12 149/5 150/4 150/18 153/16 153/23 hindsight [28] 23/18 40/25 41/22 42/9 49/10 50/1 58/13 64/4 65/23 71/21 73/11 76/2 87/24 97/3 99/19 101/24 104/6 106/9 125/9 127/23 129/5 134/20 165/9 167/9 177/14 194/7 197/18 199/21 his [53] 3/25 7/4 7/7 21/15 34/19 37/12 37/25 38/3 38/10 51/7 51/24 52/18 53/5 54/9 54/13 65/25 66/1 85/12 85/15 85/17 87/1 94/17 96/4 114/12 117/17 117/18 118/15 119/14 124/3 124/5 126/7 126/10 134/7 135/22 141/1 141/14 145/14 147/25 152/11 157/19 157/22 158/1 158/2 158/3 159/2 161/10 172/24 173/13 177/2 184/20 185/13 202/10 202/23 historic [3] 180/6 189/2 189/4 historical [1] 191/4 historically [2] 21/24 189/10 history [5] 77/3 80/23 101/6 180/6 180/7 hitherto [1] 127/15 hm [14] 6/7 6/9 6/14 34/25 34/25 91/8 113/13 127/6 161/1 161/1 161/4 162/7 164/16 184/24 HMCTS [2] 155/2	155/3 hold [6] 21/21 46/8 99/11 100/6 100/9 162/14 holding [2] 100/8 128/9 hollow [1] 171/8 honest [13] 10/25 11/15 25/2 33/9 40/3 54/7 88/4 89/14 119/25 124/19 150/20 165/20 177/15 honestly [19] 31/19 58/13 88/20 96/23 124/22 126/1 156/8 174/20 177/23 178/6 178/19 183/4 185/10 187/2 197/16 201/19 202/25 204/18 209/12 Hooper [2] 43/7 165/1 hope [7] 12/6 62/1 71/13 91/18 112/24 173/4 174/24 hoped [1] 169/11 Horizon [80] 13/19 16/6 16/13 16/23 17/2 17/19 21/3 23/2 23/23 24/18 27/23 28/2 28/7 28/10 28/16 29/12 30/5 30/14 30/20 31/14 32/3 32/10 37/18 42/5 48/14 48/16 49/1 54/2 54/13 59/15 59/16 67/12 69/22 72/20 72/22 73/4 73/6 73/8 73/14 92/12 94/16 98/11 101/6 102/21 103/1 104/17 107/3 108/4 110/1 112/25 117/21 117/24 140/5 157/15 159/18 162/25 166/5 168/23 170/21 172/3 175/25 181/14 181/15 182/5 182/13 188/15 188/19 189/3 189/5 189/5 189/15 191/7 192/2 192/9 192/11 192/16 195/16 197/12 198/25 199/10 Horizon's [1] 70/4 hosted [1] 124/2 Houghton [1] 118/4 hour [1] 55/8 house [2] 59/2 205/19 how [66] 13/25 14/19 17/17 17/23 23/11 23/22 24/15 24/23 25/1 25/15 27/9 30/9 30/23 31/6 38/23 44/20 51/3 51/11 51/22 67/16 71/2	71/17 76/14 80/5 85/2 85/2 85/11 86/22 88/9 99/7 99/8 99/8 116/5 120/20 120/23 122/12 124/10 125/15 125/16 127/20 128/2 133/12 137/19 150/25 151/4 152/10 162/17 163/19 165/11 165/12 165/17 165/21 167/6 167/12 167/18 167/19 168/2 168/2 170/17 172/6 178/25 179/22 189/19 200/5 206/22 209/20 however [13] 7/21 23/5 24/11 30/10 31/15 35/12 36/19 126/12 129/9 134/10 149/16 157/23 205/11 huge [7] 18/14 166/19 172/25 173/6 173/16 181/23 203/21 human [1] 175/8 hyperbolic [1] 171/15 hypotheses [1] 155/21
I				
			I actually [2] 159/9 200/24 I advised [2] 79/13 83/24 I agree [3] 75/9 79/2 113/21 I aimed [1] 12/17 I allowed [1] 40/9 I also [5] 24/13 91/12 105/14 110/4 154/25 I always [3] 8/8 8/15 8/17 I am [14] 27/21 29/1 43/2 45/1 78/23 80/22 110/8 111/3 111/4 112/18 118/23 128/19 159/19 166/16 I and [2] 163/7 173/12 I appreciate [1] 168/9 I are [1] 13/25 I arrived [1] 16/16 I ask [7] 1/9 1/17 88/11 121/21 122/9 157/4 184/5 I asked [4] 89/9 114/23 142/15 166/25 I assume [1] 203/1 I assumed [5] 121/2 121/3 127/17 134/23 177/13 I assure [1] 170/20 I aware [2] 49/19 49/20	

I	I describe [1] 30/10	78/24 83/18 83/18	107/14 109/1 111/11	I see [9] 49/19 93/19
I became [1] 11/3	I did [13] 33/11 40/2	104/12 116/16 127/14	116/24 119/12 122/14	93/19 95/25 115/25
I beg [2] 40/19 80/10	44/13 60/17 70/17	132/24 133/6 138/4	134/15 136/22 143/20	119/21 131/19 172/9
I began [1] 11/17	70/21 104/11 105/14	151/2 165/11 169/11	147/8 159/8 159/10	173/19
I believe [10] 8/6	111/24 182/17 203/14	170/15 197/13	159/11 159/15 159/19	I should [8] 1/9 9/24
8/13 46/18 77/20 79/6	208/10 210/1	I hadn't [1] 119/25	161/8 163/21 165/19	43/1 62/20 69/14
80/14 124/12 163/3	I didn't [10] 12/25	I happened [1] 25/3	169/9 172/5 173/7	84/17 97/15 154/24
210/1 210/17	25/12 58/4 115/13	I have [31] 15/1	173/24 174/15 178/17	I shouldn't [1] 83/17
I believed [1] 5/13	135/10 162/17 166/24	15/13 20/6 20/20	181/9 183/18 201/18	I simply [4] 13/8
I call [1] 1/5	178/21 193/2 195/6	31/21 43/12 83/15	206/11 206/11	173/14 174/21 206/18
I can [36] 4/20 9/22	I discussed [2] 79/2	85/10 88/20 90/10	I mention [1] 121/11	I sit [1] 153/13
11/19 12/12 46/15	111/21	90/11 97/22 104/18	I mentioned [2]	I sort [4] 23/20 41/9
56/25 78/9 79/16	I do [12] 2/1 2/5	108/9 109/22 112/17	150/21 197/14	87/11 111/12
83/13 84/5 87/16	16/15 17/9 30/6 30/8	118/3 121/20 121/24	I met [4] 11/17 54/6	I spoke [1] 14/9
87/17 88/23 89/5	97/3 98/18 130/2	151/6 151/14 162/23	79/3 129/21	I start [1] 2/25
89/15 90/9 95/19	137/21 171/4 180/13	162/24 174/8 177/16	I might [5] 16/9 27/14	I started [1] 121/1
97/20 100/12 104/21	I don't [58] 5/14 5/20	178/15 181/1 182/1	95/20 95/23 204/15	I stepped [1] 3/11
122/5 123/6 132/11	8/25 15/10 16/8 16/14	197/7 206/1 210/8	I missed [1] 84/6	I still [1] 99/25
163/6 163/13 163/24	34/18 40/2 45/25	I haven't [6] 77/5	I move [1] 186/15	I suggest [1] 173/20
164/13 166/11 172/14	47/19 54/6 56/18 57/5	90/18 96/10 103/11	I must [2] 108/15	I supported [1]
172/23 173/25 177/22	57/11 58/2 58/5 60/12	174/20 206/14	124/12	111/24
182/25 191/22 197/19	65/16 70/16 70/16	I honestly [5] 31/19	I need [1] 196/14	I suppose [14] 39/15
203/23	70/21 79/20 87/13	96/23 126/1 178/6	I normally [1] 121/20	41/6 44/17 45/9 71/4
I can't [56] 11/1	87/14 88/4 93/2 95/21	201/19	I now [1] 110/1	71/9 71/19 79/25
11/15 11/23 12/5 21/6	96/22 109/1 119/11	I hope [5] 12/6 91/18	I obviously [1] 15/4	87/11 147/5 160/11
30/22 32/12 32/16	123/14 142/8 143/12	112/24 173/4 174/24	I only [2] 200/22	164/2 195/4 197/13
33/1 33/9 44/13 48/5	146/6 146/12 156/9	I hosted [1] 124/2	204/22	I suspect [6] 27/24
70/16 73/11 78/14	159/12 170/16 171/20	I imagine [2] 154/5	I paid [1] 176/13	105/25 111/15 122/22
81/18 83/13 84/11	171/21 174/9 176/15	170/17	I played [2] 181/10	142/14 193/6
88/14 89/13 89/13	178/23 181/1 182/16	I interpreted [1]	181/18	I take [6] 47/15
95/7 124/19 124/19	182/21 183/21 186/8	42/14	I presume [3] 16/8	122/10 128/25 166/17
124/22 133/24 134/2	186/25 193/13 193/17	I joined [1] 177/10	48/9 84/4	168/5 169/21
136/18 136/22 137/2	194/24 195/7 195/17	I just [15] 40/13 54/8	I probably [5] 5/20	I think [207] 3/7 3/8
138/8 142/24 143/20	195/18 198/12 202/25	56/19 58/17 88/25	60/23 69/13 84/7 87/6	3/19 3/24 5/16 6/12
146/9 153/16 155/14	209/21	103/16 109/3 109/4	I propose [1] 150/5	7/14 11/7 12/12 15/3
156/8 159/9 159/15	I ended [1] 167/22	123/15 161/25 181/3	I provided [2] 79/7	16/10 20/2 20/12
162/10 163/6 163/13	I entirely [1] 194/22	183/3 192/25 202/11	109/21	20/14 21/14 25/13
172/23 178/14 178/19	I expected [1] 81/5	208/18	I put [2] 155/20	25/17 25/18 25/21
185/12 187/2 195/13	I explained [3] 52/23	I kind [1] 39/25	208/10	26/8 26/18 27/5 27/12
196/16 202/25 203/4	116/8 209/19	I knew [1] 142/25	I quote [1] 174/1	29/20 30/24 31/2 31/4
206/21 207/4 207/12	I feel [3] 40/1 76/2	I know [8] 54/6 79/16	I rather [1] 114/21	32/7 33/3 33/19 33/19
209/12 210/4	173/13	167/11 167/23 171/25	I read [4] 83/23	36/2 39/14 40/6 40/20
I cannot [2] 133/12	I felt [11] 5/12 7/20	172/20 181/18 206/24	142/10 192/15 203/11	40/23 41/8 42/9 45/11
210/6	30/23 37/4 39/4 81/11	I lacked [1] 39/9	I recall [2] 115/3	45/16 46/14 47/5
I certainly [9] 34/10	82/4 112/1 172/15	I later [1] 54/18	115/25	49/10 49/16 50/12
34/12 78/15 81/20	197/17 199/16	I left [1] 172/18	I received [8] 12/7	52/1 52/1 52/4 52/22
106/6 108/9 111/14	I followed [1] 83/21	I look [1] 29/6	54/10 78/12 83/21	55/11 56/18 56/25
131/19 134/15	I formulated [1]	I looked [4] 25/1	103/8 104/10 134/3	57/2 57/8 57/13 57/19
I chaired [1] 176/14	76/15	25/17 49/17 204/10	135/13	57/19 58/1 58/13
I come [2] 121/1	I found [1] 39/21	I made [2] 106/8	I referred [1] 136/23	58/25 59/3 60/10
200/3	I fully [1] 97/12	200/3	I remember [3] 34/5	60/11 60/14 60/23
I commissioned [1]	I gave [3] 176/6	I make [1] 12/5	34/16 95/24	65/3 65/6 65/6 66/4
162/18	176/7 198/12	I may [5] 77/22 123/6	I represent [2]	66/7 67/7 69/13 70/23
I conclude [1] 90/13	I get [4] 22/9 80/25	139/5 144/4 186/6	164/22 200/16	71/17 72/3 72/6 75/10
I could [15] 5/13	162/20 177/17	I mean [62] 7/19	I responded [1]	75/25 76/9 76/12
36/22 39/6 45/25 80/9	I give [1] 163/2	10/25 12/15 12/21	197/15	76/19 77/5 79/18 81/9
87/13 176/7 181/11	I go [1] 175/4	15/1 15/13 16/8 16/9	I said [5] 109/4	81/18 82/4 82/13
193/17 194/3 194/24	I got [9] 16/19 47/11	20/3 22/7 27/8 29/19	168/18 170/15 195/6	82/25 84/17 86/20
195/3 197/16 199/25	72/3 80/4 121/23	29/25 31/17 32/25	204/10	87/6 87/7 87/20 90/9
199/25	133/22 135/7 171/5	32/25 33/1 33/1 36/2	I saw [2] 196/16	91/11 93/2 93/7 93/7
I deal [1] 53/20	193/14	36/4 38/22 40/9 40/24	206/21	93/8 93/12 93/12
I delegated [1]	I had [22] 11/20	42/9 49/16 52/1 52/5	I say [6] 20/3 24/3	93/23 94/10 95/4 95/5
114/16	27/12 30/6 37/2 45/25	58/13 58/19 60/10	87/12 97/1 103/22	97/5 97/17 100/7
	46/14 53/3 54/19	71/8 79/24 82/5	176/6	101/16 102/5 103/12

I	I was [45] 3/10 8/17 15/6 15/8 30/4 30/4 31/4 33/13 33/15 39/24 50/17 57/20 58/14 71/17 71/20 71/23 81/19 83/3 105/5 106/4 106/11 119/5 134/21 134/23 137/18 143/1 145/19 151/13 154/11 155/3 165/10 166/23 167/5 167/9 167/16 171/1 176/11 176/12 176/13 180/3 181/17 203/12 208/21 208/22 208/22	73/14 76/16 77/18 78/8 79/19 84/18 85/11 88/4 88/7 88/15 88/16 89/2 90/9 91/18 93/4 95/3 95/24 96/21 99/15 99/21 100/7 100/7 100/10 100/15 104/9 109/1 111/25 112/10 115/1 116/24 121/12 121/23 123/11 124/21 125/22 125/22 128/10 128/19 134/8 134/18 138/19 138/24 142/1 143/8 143/17 143/20 143/23 144/6 144/12 147/6 150/20 154/12 155/5 162/12 165/24 169/1 170/9 171/2 171/11 171/25 172/5 173/19 174/11 174/19 175/22 176/2 176/6 176/17 176/22 178/5 178/24 179/1 181/18 183/24 185/14 185/20 187/5 187/6 188/9 191/20 192/25 193/4 193/6 194/6 194/14 194/16 194/16 194/19 194/24 195/18 198/13 198/15 200/19 201/5 201/24 205/3 205/9 206/16 207/12 207/22 207/23 208/7 208/24 210/6 210/14	125/20 130/21 154/9 ie about [1] 73/10 ie applying [1] 154/9 ie connected [1] 16/6 ie email [1] 125/20 ie if [1] 14/10 ie rewrite [1] 37/12 ie the [7] 54/23 56/16 58/9 59/17 88/5 107/5 123/1 ie to [2] 57/16 130/21 ie within [1] 47/10 ie you [3] 56/13 56/22 117/2 ie your [1] 51/24 if [191] 5/21 5/22 6/10 6/24 7/3 8/10 11/7 13/11 13/20 14/6 14/10 15/16 16/25 17/6 18/24 20/7 20/15 21/9 21/9 21/17 22/22 23/14 23/25 24/9 25/16 26/25 27/6 29/3 29/10 33/23 34/1 35/12 35/14 36/4 36/13 36/18 36/19 37/7 37/11 38/21 38/22 39/16 40/3 40/9 40/12 40/23 44/13 44/21 47/12 48/6 48/10 50/9 50/21 50/22 53/2 54/7 56/21 57/6 57/23 58/21 59/2 59/8 59/10 59/19 59/19 60/24 61/8 61/16 65/11 66/25 69/14 73/24 74/10 75/10 75/18 76/15 77/1 80/9 82/2 82/14 83/1 84/2 84/4 85/13 85/18 87/2 87/8 87/8 88/4 88/13 89/8 89/11 91/20 92/3 96/12 100/4 100/13 104/2 108/3 112/6 112/13 112/13 116/5 118/20 119/19 121/19 121/21 122/10 123/6 129/12 132/6 132/25 133/9 134/4 135/17 139/5 141/11 143/3 143/12 143/20 146/6 147/6 149/2 149/6 149/11 150/16 150/20 151/2 151/3 151/9 151/24 152/5 152/6 152/14 156/2 157/6 157/13 157/16 160/18 161/8 163/15 164/25 165/11 165/17 166/11 167/24 168/15 169/4 171/13 171/14 173/25 175/1 175/8 176/8 178/9 178/19 181/3 181/10	181/19 182/11 183/18 189/20 190/7 191/18 191/22 193/10 193/14 194/11 197/13 201/7 201/22 202/7 202/21 202/23 203/5 203/7 203/15 203/23 203/24 204/13 205/2 205/5 205/14 205/21 205/24 206/19 206/21 207/1 208/5 210/2 210/5 iii [1] 2/2 ill [2] 130/20 131/1 ill-advised [2] 130/20 131/1 illogically [1] 74/23 illustration [1] 40/13 imagine [6] 99/6 104/15 154/5 159/16 170/17 181/11 imagined [1] 121/15 immediate [2] 14/6 165/16 immediately [6] 32/18 56/8 58/4 71/21 105/24 143/7 immense [1] 163/22 immured [1] 179/7 impact [8] 65/11 76/13 124/17 149/19 152/10 168/12 180/10 199/5 impacts [1] 199/11 impediments [1] 98/19 implemented [1] 49/3 implementing [1] 103/1 implicated [1] 39/12 implicates [2] 134/13 135/1 implication [1] 105/25 implications [1] 127/19 implied [2] 81/21 180/16 implying [1] 178/20 importance [4] 8/8 8/15 64/8 102/10 important [9] 4/20 12/9 20/24 21/4 39/6 76/17 76/18 104/5 206/9 impossible [2] 64/20 173/3 impression [3] 12/19 12/25 107/19 imprisoned [1] 178/12 imprisonment [1] 63/6 improper [2] 140/24
I think... [96] 104/4 104/5 104/22 104/25 107/8 107/13 107/17 108/9 108/12 108/15 109/5 109/9 110/13 110/21 111/11 111/21 113/14 113/19 113/21 116/8 117/4 118/22 119/5 119/21 120/15 121/1 121/23 124/14 127/13 129/4 133/5 136/11 136/22 139/17 141/22 142/6 142/12 142/22 143/6 143/12 143/15 143/16 145/20 146/8 146/20 147/20 151/3 151/8 152/24 153/5 153/7 153/24 154/11 154/16 155/8 156/8 156/10 159/10 159/20 160/2 160/7 162/10 165/8 165/11 165/14 165/15 167/2 168/17 169/13 170/9 170/13 170/15 174/18 175/1 175/19 176/8 177/13 178/13 179/15 182/19 183/23 183/24 184/19 189/21 192/25 195/3 197/7 199/20 203/18 206/16 207/14 208/18 208/20 208/22 208/22 209/19	I wasn't [4] 15/5 33/20 129/25 208/20 I way [1] 164/25 I went [3] 55/3 70/13 135/14 I were [1] 146/5 I will [5] 44/3 146/11 177/19 179/10 185/20 I wish [2] 82/24 110/6 I would [39] 6/24 7/23 15/2 15/10 17/17 21/6 21/6 27/1 27/9 31/20 36/22 44/18 44/21 46/23 57/2 57/11 57/13 93/10 104/6 106/3 106/4 119/21 122/14 144/9 153/20 155/4 159/16 159/20 164/1 171/5 172/24 173/5 174/21 174/22 175/11 175/16 179/17 191/20 206/22	I've [41] 7/14 12/13 12/14 15/19 21/5 29/21 47/19 50/18 50/19 57/9 58/5 66/10 71/8 75/10 78/9 79/11 80/22 80/23 82/21 90/12 98/5 105/17 110/13 110/14 131/24 138/4 141/9 145/9 145/17 153/12 162/14 172/12 175/4 175/10 175/16 177/7 177/9 181/2 183/24 188/22 203/18 Ian [5] 54/4 54/19 55/2 55/2 57/4 idea [6] 15/1 15/13 54/23 108/9 172/7 206/5 ideally [3] 35/21 37/16 41/4 identified [4] 27/13 67/17 161/22 166/4 identifying [1] 47/25 ie [21] 14/10 16/6 37/12 47/10 51/24 54/23 56/2 56/13 56/16 56/22 57/16 58/9 59/17 73/10 88/5 107/5 117/2 123/1	I took [11] 12/8 58/3 58/5 71/3 72/7 80/4 83/3 104/10 127/16 128/10 199/17 I tried [4] 170/16 180/13 189/11 197/11 I turned [2] 5/12 166/25 I understand [12] 41/22 41/25 90/7 93/21 99/21 118/11 139/12 177/7 177/9 177/22 180/13 193/1 I understood [6] 77/19 78/10 80/25 87/7 115/8 125/9 I use [1] 191/24 I want [13] 13/14 46/8 94/6 129/15 164/24 168/8 197/3 197/4 200/23 201/3 205/2 205/4 205/7 I wanted [5] 40/18 55/12 80/24 135/11 204/19	

I	independently [9] 35/15 50/24 58/12 72/21 98/12 137/17 192/6 192/20 193/11	instigated [1] 102/19 instil [3] 35/12 36/17 36/19 instilling [1] 35/25 instinct [1] 33/24 institutional [1] 179/8 instruct [3] 47/17 72/18 72/24 instructed [2] 30/11 126/15 instructing [1] 72/11 instructions [12] 47/6 47/7 47/12 49/15 51/10 51/17 51/21 52/9 52/11 125/11 202/10 202/21 insurance [1] 131/24 integrity [6] 37/18 42/4 157/14 188/20 189/16 191/7 intending [1] 23/17 intention [6] 33/16 71/14 80/1 169/11 170/3 170/8 intentions [1] 129/15 interactions [1] 179/12 interchangeable [2] 183/8 183/16 interest [11] 7/1 19/4 63/21 79/25 83/19 90/12 101/18 108/7 108/17 108/22 125/18 interesting [8] 27/8 77/2 78/8 113/19 141/19 143/3 146/3 170/25 interests [6] 102/14 129/1 129/3 129/8 152/13 177/3 interim [2] 3/5 32/14 internal [2] 122/18 207/18 internally [1] 100/14 interpreted [3] 15/7 42/14 148/2 interpreting [1] 42/15 intervene [1] 28/19 intervention [2] 43/24 44/2 interview [1] 19/22 interviewed [1] 51/6 intimating [1] 140/19 into [49] 2/16 7/5 7/13 11/25 16/11 16/14 16/20 37/2 40/7 42/15 56/10 57/17 59/4 59/14 61/25 64/17 64/21 66/6 66/11 67/22 77/3 79/15 84/22 87/25 104/13 105/3 110/15 111/16 113/6 115/5	118/7 124/18 132/4 132/23 133/20 139/6 147/3 163/8 168/12 169/14 169/16 178/25 181/8 184/12 186/25 187/19 191/10 193/3 197/6 introduced [4] 18/4 70/6 192/4 192/18 introduction [1] 48/11 introductions [1] 59/12 inverted [1] 49/25 investigate [3] 47/3 49/4 132/14 investigated [2] 18/13 39/13 investigating [3] 17/15 22/24 46/25 investigation [13] 17/25 23/5 28/5 38/1 43/9 43/21 44/16 59/22 65/24 74/24 108/5 132/17 180/2 investigations [9] 59/17 59/18 67/22 117/10 117/11 132/12 132/25 133/2 133/13 investigator [1] 50/11 investigators [5] 28/13 56/14 58/20 62/18 67/22 Investments [1] 184/12 invite [1] 205/11 invited [1] 54/12 invites [1] 209/20 inviting [2] 143/8 143/24 involve [1] 13/13 involved [14] 45/22 47/16 57/23 64/1 81/14 116/13 147/8 153/6 153/8 155/4 171/24 177/1 181/25 184/22 involvement [3] 35/21 153/1 175/20 involves [1] 29/23 involving [5] 18/16 23/8 34/3 137/12 182/3 Ireland [1] 74/18 irregularity [1] 148/7 irrelevant [4] 136/13 136/17 137/8 137/23 irrespective [2] 100/3 103/18 irritating [1] 173/8 is [494] is all [1] 193/25 isn't [16] 36/7 45/1	65/1 96/23 98/17 100/12 102/4 137/13 151/6 170/17 172/25 179/20 182/19 186/1 198/7 206/9 issue [40] 10/1 12/2 14/14 16/2 16/10 20/25 21/3 21/4 21/4 23/21 23/22 24/17 39/16 41/18 44/7 47/15 50/12 64/6 64/8 65/10 70/11 70/15 70/21 71/19 74/11 74/13 83/1 95/22 96/9 108/3 108/7 115/4 116/14 116/17 127/1 136/12 150/13 165/13 167/25 200/23 issue' [1] 149/8 issued [2] 56/8 113/11 issues [90] 16/20 21/8 23/19 26/6 28/2 28/9 28/12 29/11 29/14 29/21 30/9 30/14 30/20 31/13 31/25 32/3 32/10 32/22 33/20 37/3 41/19 41/20 42/16 44/14 45/12 45/15 45/15 45/22 46/5 46/10 47/3 52/20 55/24 61/5 61/18 69/17 71/18 73/13 76/7 76/9 76/14 76/20 91/9 92/16 97/22 98/21 99/23 99/25 102/7 102/25 103/2 104/16 104/17 108/21 108/24 132/10 136/13 137/14 137/24 139/25 140/2 140/4 142/25 145/15 148/8 148/22 149/13 149/17 152/9 152/23 159/18 169/4 169/13 170/22 172/3 175/5 178/16 182/5 182/13 189/1 189/4 189/10 190/17 196/21 197/12 197/25 198/11 199/16 200/4 203/19 it [559] it's [159] 2/20 4/12 4/13 4/14 4/16 4/16 4/20 5/14 5/16 5/24 5/25 6/4 6/5 9/5 11/7 11/9 14/24 17/3 20/2 20/3 22/16 23/15 24/18 26/2 26/3 27/8 29/19 29/25 31/19 34/20 35/6 35/20 36/2 36/5 36/10 36/15 37/11 40/6 40/7 40/22 44/22 44/24 45/16
----------	--	---	---	--

<p>I</p> <p>it's... [116] 48/6 50/14 53/8 55/11 55/15 57/11 58/25 59/7 59/13 61/16 76/18 77/12 77/18 78/21 79/17 80/3 83/2 83/3 84/9 85/5 87/20 87/25 89/7 90/20 91/12 93/9 93/20 94/5 94/5 97/3 98/4 98/11 99/2 99/3 100/21 104/5 104/14 104/24 105/20 107/12 107/12 107/13 107/17 111/21 113/20 113/22 113/25 120/12 121/22 123/15 123/24 127/22 128/19 129/16 131/17 139/9 139/14 142/8 143/17 145/6 146/2 150/21 151/16 151/22 157/13 160/4 160/15 162/13 162/13 166/8 166/9 166/12 166/13 167/23 168/17 170/3 170/6 170/12 170/16 171/11 171/13 171/23 173/3 173/6 173/8 173/17 174/19 175/1 175/18 177/25 179/20 180/14 181/21 182/4 182/22 185/10 185/13 186/5 187/15 188/10 188/15 189/16 191/12 192/24 193/7 193/24 195/21 201/10 201/20 201/24 203/11 205/2 205/3 205/5 205/7 206/11</p> <p>italics [1] 49/25</p> <p>iteration [1] 21/11</p> <p>iterative [1] 117/25</p> <p>its [44] 5/8 5/11 8/1 10/4 10/11 18/6 18/7 19/24 23/15 35/17 36/16 49/1 56/23 62/3 63/17 65/10 65/24 70/8 74/16 77/9 98/19 101/5 101/23 102/14 103/6 103/18 108/7 108/21 117/10 117/25 125/1 137/5 140/6 140/23 145/17 155/23 155/24 155/25 170/7 172/13 172/13 198/8 207/16 209/2</p> <p>itself [10] 5/1 22/22 53/20 59/4 59/5 93/15 99/14 110/20 113/18 122/11</p>	<p>jail [1] 29/24</p> <p>James [4] 35/7 35/9 35/24 133/16</p> <p>Jane [38] 20/10 20/14 34/9 34/12 34/22 39/11 41/7 43/2 43/2 47/14 48/20 78/18 78/20 80/6 82/10 84/4 85/6 86/21 86/21 93/7 115/18 116/19 117/1 120/6 125/19 126/3 126/18 128/21 136/3 139/10 143/5 143/14 145/24 146/7 147/14 151/22 152/2 152/4</p> <p>Jane's [1] 34/18</p> <p>January [11] 60/18 60/19 85/5 106/14 106/19 107/23 109/16 109/17 109/20 119/2 182/4</p> <p>Jason [1] 1/17</p> <p>Javid [1] 6/5</p> <p>Jenkins [9] 32/19 32/24 33/4 156/21 157/19 157/21 157/25 158/9 159/7</p> <p>Jenkins' [1] 158/12</p> <p>JFSA [4] 113/8 180/16 190/1 199/14</p> <p>Jo [1] 10/7</p> <p>job [8] 16/11 16/14 29/18 33/25 47/11 95/11 121/21 121/22</p> <p>jog [1] 5/21</p> <p>joined [8] 10/24 15/9 22/11 27/19 32/8 41/7 137/18 177/10</p> <p>joining [4] 17/4 21/3 32/17 47/10</p> <p>Jonathan [30] 30/10 45/5 46/15 48/1 55/4 57/2 85/8 85/14 85/16 86/4 86/22 86/25 101/2 101/7 101/21 106/21 109/23 111/25 114/12 117/16 118/14 119/22 120/21 120/24 124/3 124/24 125/14 130/5 133/10 162/18</p> <p>Jonathan's [1] 117/23</p> <p>Josephine [2] 35/10 62/20</p> <p>judge [31] 98/21 99/25 100/5 100/8 128/2 139/20 139/21 140/17 141/9 141/18 142/10 145/9 145/21 147/18 147/24 148/16 149/4 149/13 149/16 149/20 149/24 150/17 151/17 153/23 154/9</p>	<p>154/17 168/22 169/4 180/20 181/14 205/16</p> <p>judge's [8] 140/11 141/6 141/23 152/10 152/19 153/9 153/11 155/10</p> <p>judged [1] 208/5</p> <p>judgement [9] 94/19 94/23 95/10 97/3 97/4 106/8 128/4 175/19 176/5</p> <p>judgements [1] 175/19</p> <p>judges [3] 151/4 151/13 154/13</p> <p>judgment [15] 100/9 139/13 141/9 142/18 145/5 146/1 146/2 147/25 148/19 151/17 152/23 170/22 172/3 182/6 182/13</p> <p>judiciary [2] 153/18 154/15</p> <p>July [7] 1/1 32/14 157/8 162/5 177/12 201/1 210/24</p> <p>July 2013 [1] 32/14</p> <p>jumped [2] 57/12 71/21</p> <p>junction [1] 147/6</p> <p>June [7] 6/6 93/25 126/3 129/16 136/1 136/1 184/21</p> <p>jury [1] 62/7</p> <p>just [134] 4/9 6/10 7/4 8/10 8/12 13/10 15/19 16/10 17/7 20/7 20/7 21/10 22/8 24/5 25/8 29/25 30/3 31/19 35/22 36/2 36/21 40/13 40/19 41/3 41/24 42/2 42/11 46/2 46/22 47/12 47/21 50/22 53/8 54/8 56/19 56/19 58/15 58/17 59/8 59/10 59/19 61/21 66/10 66/12 67/9 69/15 70/13 75/8 75/18 77/9 80/9 83/2 85/12 85/23 88/25 91/4 94/7 95/10 99/2 99/4 100/18 103/16 103/25 104/22 105/5 105/15 106/17 107/21 108/16 108/19 109/3 109/4 109/21 112/14 116/1 120/22 123/15 123/23 123/24 124/9 125/22 126/4 129/23 131/12 135/17 135/17 137/13 138/12 139/5 141/25 142/1 152/20 155/1 155/20 156/10 157/6 157/16 160/10</p>	<p>161/25 162/25 163/11 163/22 164/14 167/6 170/17 171/8 171/14 171/18 172/11 172/16 173/3 174/18 175/25 176/10 176/23 179/14 181/3 183/3 188/9 189/22 192/25 193/4 193/22 195/2 201/3 201/5 201/16 202/11 205/3 205/8 206/25 207/24 208/18 208/21</p> <p>justice [9] 28/9 29/15 32/6 48/17 127/2 148/10 150/13 168/11 181/23</p> <p>justification [1] 9/17</p> <p>justificatory [2] 138/10 138/12</p>	<p>70/9 92/25 122/10 157/25 159/20 160/6 203/5</p> <p>knows [1] 205/9</p> <p>knuckles [1] 141/18</p>
<p>J</p> <p>JA [1] 36/6</p>			<p>K</p> <p>KBW [1] 109/23</p> <p>KC [2] 196/24 201/1</p> <p>keep [8] 7/18 10/12 19/8 40/19 49/11 104/18 180/10 180/11</p> <p>keeping [2] 8/7 8/14</p> <p>Kelly [3] 152/1 152/18 153/1</p> <p>Ken [6] 94/8 94/18 95/6 96/1 96/5 147/6</p> <p>key [9] 10/8 10/20 11/9 37/8 50/11 91/19 105/22 144/24 148/19</p> <p>killed [1] 168/16</p> <p>kind [27] 5/6 19/25 36/13 39/16 39/25 41/2 41/9 47/19 60/15 80/24 85/2 87/21 88/25 89/1 107/4 107/12 107/19 121/10 127/13 132/24 138/9 143/24 147/2 150/23 151/2 155/15 208/14</p> <p>kindly [1] 1/21</p> <p>King [4] 63/22 63/23 64/12 157/9</p> <p>Kingdon [1] 147/24</p> <p>knell [1] 191/19</p> <p>knew [6] 80/2 93/11 142/25 207/18 207/20 208/2</p> <p>Knight [7] 30/11 45/6 46/18 53/20 60/22 106/21 109/23</p> <p>knit [2] 81/22 81/22</p> <p>know [240]</p> <p>knowing [2] 44/17 174/12</p> <p>knowledge [9] 2/18 10/15 30/7 40/25 88/21 125/17 131/8 131/11 131/12</p> <p>known [9] 15/2 64/24</p>	<p>L</p> <p>lack [4] 10/15 75/3 82/19 165/15</p> <p>lacked [1] 39/9</p> <p>laid [1] 37/6</p> <p>Lambert [1] 152/2</p> <p>landed [2] 76/24 194/1</p> <p>language [5] 65/1 76/16 76/18 107/14 171/13</p> <p>large [3] 99/1 139/1 184/6</p> <p>largely [3] 22/24 178/16 191/4</p> <p>larger [1] 186/23</p> <p>last [16] 2/13 17/14 22/23 24/11 25/3 27/23 106/24 112/13 126/5 134/12 135/1 139/13 147/23 156/19 157/6 167/13</p> <p>lastly [3] 109/12 159/1 161/8</p> <p>late [7] 14/16 25/13 159/23 159/24 167/7 168/6 182/17</p> <p>later [17] 12/21 15/17 21/10 33/6 54/18 55/21 91/5 93/24 94/3 97/10 107/22 123/24 140/8 143/16 156/25 162/3 184/11</p> <p>Laura [3] 6/1 15/17 107/24</p> <p>law [6] 67/3 140/3 148/3 148/4 155/17 155/23</p> <p>lawyer [10] 21/13 29/19 45/7 45/21 46/3 46/23 46/24 104/9 127/18 205/19</p> <p>lawyers [21] 18/15 21/21 47/16 128/22 130/22 131/13 134/22 135/4 156/11 156/14 159/2 169/25 170/7 170/10 182/3 183/6 183/7 183/11 183/14 183/16 183/17</p> <p>layer [1] 160/20</p> <p>lead [3] 9/16 10/4 36/9</p> <p>leadership [1] 102/18</p> <p>Leading [3] 51/2 52/10 52/16</p> <p>leads [1] 143/9</p>

<p>L</p> <p>learn [1] 32/22 learning [1] 199/9 learnt [1] 54/18 least [16] 43/12 59/6 69/8 74/21 74/24 88/15 121/16 147/8 148/22 148/24 149/7 152/22 154/4 158/11 184/9 209/24 leave [1] 159/4 led [4] 17/22 19/12 45/7 97/13 left [9] 9/10 9/24 10/2 172/18 172/20 181/3 195/22 205/12 205/13 left-hand [3] 9/10 9/24 10/2 Legacy [4] 73/8 73/14 98/10 181/14 legal [59] 29/21 33/21 34/9 45/15 45/18 45/24 46/5 46/11 47/4 60/3 60/20 63/11 66/17 71/10 73/17 77/16 79/23 80/19 81/12 81/14 81/20 82/19 84/13 84/18 85/19 87/3 87/10 87/23 88/21 88/25 89/7 89/11 90/4 94/19 96/3 96/18 101/11 102/7 104/10 110/7 110/9 110/12 116/14 116/17 127/16 130/4 131/24 134/7 135/3 137/7 140/1 140/13 156/14 169/13 177/18 183/9 203/25 209/14 209/21 legally [17] 77/4 77/8 77/20 77/23 78/5 78/11 79/21 80/2 80/11 81/1 81/7 81/12 82/23 88/1 88/5 88/8 91/14 Leighton's [1] 175/23 length [4] 13/7 19/11 19/19 113/15 lengths [1] 18/10 lens [2] 167/17 167/18 less [7] 57/1 64/22 66/4 72/2 122/22 132/16 186/22 let [6] 14/2 104/4 126/20 131/21 172/6 191/22 let's [23] 5/21 22/10 57/14 58/7 58/7 59/5 71/1 71/1 71/12 71/12 72/8 76/19 107/21</p>	<p>122/16 136/3 187/17 188/10 189/19 190/8 192/8 197/2 201/22 201/22 letter [41] 16/15 16/18 16/19 27/17 29/10 29/17 33/10 34/21 37/2 37/6 37/23 38/10 42/3 42/10 42/13 48/12 49/7 49/24 54/1 91/24 100/21 103/8 103/22 109/14 110/19 110/20 110/22 111/2 112/15 113/11 113/15 113/20 124/2 124/13 124/13 166/3 166/6 171/21 171/22 174/7 177/17 letters [4] 5/3 170/21 172/2 177/19 level [3] 151/23 152/4 153/1 levelled [1] 140/21 levels [1] 172/25 liability [4] 166/1 173/16 181/24 185/21 liable [1] 172/5 licences [1] 5/6 lifetime [4] 72/20 73/3 73/6 73/12 light [7] 25/9 53/25 76/7 125/3 126/12 199/19 199/19 like [40] 9/20 13/4 14/6 15/22 17/1 20/22 23/11 25/22 33/23 44/5 51/18 52/3 59/2 86/24 89/1 89/9 104/22 124/15 133/25 134/17 141/15 142/22 143/8 153/18 162/14 162/21 163/4 165/17 171/5 174/1 177/5 179/21 185/10 187/8 193/7 198/2 199/13 199/23 201/18 203/24 likelihood [1] 75/16 likely [19] 38/9 40/7 44/2 54/15 54/16 54/22 56/11 56/23 69/5 72/2 72/2 76/25 149/16 152/12 154/10 154/22 201/10 201/17 201/20 limit [2] 118/15 119/14 limitations [3] 85/15 85/17 87/1 limited [14] 4/7 9/2 21/15 37/17 65/25 88/18 106/24 107/11 107/18 117/11 157/15 158/14 161/21 198/14 line [2] 65/20 166/13</p>	<p>lines [5] 59/20 60/2 87/17 124/6 155/9 linked [1] 44/14 list [6] 25/16 25/18 27/12 118/25 146/8 160/16 listen [1] 55/12 listened [1] 57/2 listening [1] 58/16 literally [1] 73/7 litigation [52] 33/6 65/19 77/13 94/1 97/11 97/14 97/16 97/19 99/18 99/21 116/21 122/22 124/7 124/10 125/3 125/7 126/6 126/12 126/15 127/11 129/2 129/19 129/21 129/23 132/11 132/13 133/3 133/7 133/8 135/20 136/12 138/22 140/21 141/17 143/11 144/2 144/14 144/18 144/22 146/23 152/21 154/1 156/3 159/22 160/11 169/14 169/22 181/8 183/10 185/22 188/15 207/6 little [29] 21/10 40/1 40/17 40/17 42/18 46/2 50/17 52/5 59/8 59/11 71/17 84/19 104/5 105/15 111/11 121/10 127/14 134/17 134/18 149/4 151/13 164/15 174/12 184/18 187/7 189/22 195/22 201/3 203/12 logic [2] 138/10 138/13 logical [2] 35/17 37/25 logs [3] 68/12 68/17 72/13 long [10] 1/22 59/7 98/9 99/4 104/13 127/4 182/5 195/14 199/23 200/8 longer [7] 9/15 55/7 55/8 55/15 117/12 173/17 174/11 look [96] 5/21 5/22 9/1 13/2 14/14 15/22 16/5 16/12 16/19 20/7 22/10 22/22 24/23 24/24 25/1 25/16 26/10 26/12 26/15 29/6 37/2 41/18 41/19 42/3 42/15 44/18 47/6 49/10 49/18 50/9 50/14 50/19 50/21 52/2 59/5 59/8 59/20 61/10 65/9 68/2 69/4 71/22 80/22 83/14</p>	<p>83/14 85/4 85/12 91/4 92/1 94/2 101/5 106/11 107/21 108/3 109/13 116/18 117/5 123/9 123/22 127/23 139/5 139/8 143/7 147/12 147/13 152/6 157/4 157/16 160/12 161/8 162/19 162/21 167/16 167/18 170/3 176/9 181/9 182/17 182/21 186/25 188/23 189/19 196/21 197/3 197/11 197/20 200/22 200/24 201/3 203/7 203/8 204/22 205/2 205/5 205/7 206/23 looked [22] 23/20 24/18 25/1 25/5 25/17 36/24 49/17 50/16 71/8 113/6 126/4 148/21 151/5 160/3 180/5 187/7 193/13 193/23 203/20 204/7 204/10 208/21 looking [44] 10/25 12/19 13/9 13/10 24/21 25/21 30/22 36/3 45/13 45/19 49/6 49/18 51/9 52/22 67/23 68/12 72/9 77/18 87/7 90/13 91/10 95/8 103/20 104/16 104/17 109/15 115/2 123/7 123/24 123/25 130/17 130/21 131/5 131/13 131/18 132/3 139/8 147/13 161/20 178/1 188/22 199/23 204/14 209/9 looks [10] 17/1 86/24 99/7 126/22 134/16 138/18 141/14 143/8 183/6 193/7 Lord [6] 61/13 62/13 147/22 148/17 150/6 150/11 Lord Arbuthnot [1] 61/13 Lord Grabiner [1] 150/6 Lord Neuberger [1] 147/22 lose [1] 113/18 losing [1] 4/23 loss [8] 19/6 85/19 87/3 87/10 87/19 90/5 117/8 154/2 losses [7] 17/21 23/3 24/11 62/4 67/13 205/24 206/4 lost [3] 140/13 169/2 169/21 lot [35] 12/13 25/14</p>	<p>33/19 33/22 39/15 40/8 46/19 49/12 50/8 53/3 57/3 58/16 59/3 65/18 88/7 97/21 98/3 98/20 99/23 104/19 104/20 106/5 138/24 160/3 160/6 162/25 171/23 175/25 176/1 180/4 180/18 183/22 194/11 206/12 206/13 love [4] 174/18 174/21 182/24 185/11 low [1] 53/2 lunch [3] 11/17 11/21 109/12 Lyons [5] 13/21 15/18 20/10 22/12 22/19</p> <hr/> <p>M</p> <p>M035 [1] 62/16 MacLeod [37] 20/11 34/9 34/12 34/23 39/11 41/7 47/14 48/20 78/18 78/20 80/6 81/15 82/10 83/8 84/4 85/6 86/21 86/21 93/7 110/20 115/18 116/19 117/1 120/7 124/1 124/23 125/20 126/3 126/18 128/21 136/3 139/10 143/5 145/24 147/14 151/22 152/2 MacLeod's [3] 43/2 83/22 152/4 made [62] 5/17 12/21 18/18 19/14 22/24 26/9 26/10 26/12 30/15 42/5 48/25 53/2 56/7 57/4 73/24 73/24 76/8 80/14 86/4 86/19 87/5 87/25 94/18 94/22 95/9 97/4 101/20 106/8 108/1 108/22 109/25 111/9 112/8 112/12 113/5 114/12 117/15 118/2 119/8 130/7 130/12 141/3 142/18 143/13 143/23 148/6 150/24 151/17 152/16 153/9 159/6 161/3 172/25 173/7 178/6 182/11 186/1 190/12 190/15 194/20 200/3 202/10 magic [4] 130/18 130/23 131/3 131/4 Mail [2] 5/1 5/1 main [6] 23/19 107/25 111/15 125/19 136/22 191/25 maintain [1] 37/20 Majesty's [2] 3/25</p>
---	---	---	--	---

M	material [10] 21/18 38/8 65/19 78/23 139/1 157/25 158/12 158/20 159/3 182/11	177/15 177/20 178/7 185/11 191/22 193/5 196/18 200/20 201/6 205/5 205/15 206/12 206/15 208/19 208/21 21/15 12/21 15/1 15/13 16/8 16/9 20/3 22/7 27/3 27/8 29/19 29/25 30/25 31/7 31/17 32/25 32/25 33/1 33/1 36/2 36/4 38/22 40/9 40/24 42/9 49/16 49/24 50/21 52/1 52/5 58/13 58/19 60/10 71/8 73/7 79/24 80/21 82/5 87/13 88/25 107/14 108/14 109/1 110/11 111/11 116/24 119/12 119/22 122/14 131/3 134/15 136/22 143/20 147/8 155/12 155/22 156/2 157/18 159/8 159/10 159/11 159/15 159/18 159/19 161/8 163/21 165/19 169/9 172/5 173/7 173/24 174/15 178/17 181/9 183/18 193/11 193/12 193/13 201/18 206/11 206/11	58/3 58/5 58/9 58/14 68/25 79/5 84/1 84/6 85/9 86/20 91/17 92/4 92/7 94/3 102/13 106/14 107/23 109/16 109/16 109/20 152/17 160/13 160/15 161/3 161/24 162/2 176/13 182/19	138/13 151/5 160/5 163/10 167/7 167/14 169/6 177/24 178/18 179/17 180/18 184/22 194/1 197/8 197/15 198/1 199/21 200/22 204/15 205/21 206/3
Majesty's... [1] 3/25	materially [1] 118/10	meetings [7] 52/7 84/5 100/18 117/21 125/21 163/3 176/15	mind [16] 45/21 46/9 57/20 83/18 89/3 89/16 95/13 95/20 97/22 98/5 104/23 123/15 137/11 177/11 191/2 207/24	
majority [2] 18/4 43/25	materials [1] 51/5	meets [2] 192/6 195/10	mindful [1] 69/5	
make [30] 8/21 12/2 12/5 20/17 26/18 28/21 43/22 45/2 45/7 76/21 79/24 87/16 104/14 123/6 152/15 154/24 155/24 156/7 156/9 156/15 165/10 166/22 166/23 166/24 167/9 170/16 173/6 180/4 181/17 183/13	matter [22] 15/24 29/3 39/8 39/12 46/10 54/14 57/16 62/14 63/10 63/12 126/13 127/16 155/23 159/23 159/24 173/10 173/17 173/18 177/18 200/5 206/20 206/22	member [9] 39/17 48/7 84/21 129/23 144/2 144/23 144/24 147/7 152/21	minded [2] 41/1 148/13	
makes [7] 4/10 21/15 38/23 105/3 105/16 136/12 146/22	matters [19] 38/2 42/24 59/21 60/1 76/12 76/17 76/20 112/21 113/3 127/9 140/5 140/7 146/25 153/25 157/10 179/16 196/5 199/1 207/2	members [11] 10/22 82/2 82/12 82/16 83/16 83/17 94/12 146/18 147/9 163/8 198/9	mindset [6] 57/8 58/1 172/19 172/21 173/5 173/20	
making [19] 19/5 93/21 94/15 95/24 134/13 140/23 154/21 154/23 159/19 163/25 171/1 177/9 177/22 180/13 180/20 194/16 199/13 207/22 210/12	maximum [1] 63/5	memory [11] 5/21 16/17 46/18 48/7 55/10 56/1 146/22 201/5 201/7 204/16 207/1	minimum [3] 105/2 105/6 209/23	
man [4] 26/24 27/7 27/13 32/19	may [37] 1/5 17/21 26/12 28/8 39/12 53/21 75/17 77/22 87/18 89/19 89/20 93/24 97/13 103/22 113/1 113/1 113/2 116/19 117/7 119/3 123/6 123/25 123/25 124/16 133/16 139/5 144/4 156/22 159/4 173/24 185/8 186/6 189/20 191/3 191/4 199/5 199/10	meaningful [3] 151/3 151/4 177/1	minister [34] 6/13 6/16 15/19 15/21 15/25 16/4 43/5 43/11 43/17 43/19 44/9 44/20 44/23 51/8 51/13 84/15 85/13 85/16 86/1 86/15 86/17 86/23 87/12 90/1 90/10 90/15 91/24 92/10 101/19 107/21 126/16 130/12 135/15 153/7	
manage [2] 7/25 146/24	maybe [9] 15/7 98/19 105/25 166/23 186/7 194/2 194/2 197/4 203/15	means [13] 15/3 15/4 22/1 31/1 31/7 40/20 125/19 147/3 153/12 157/18 175/14 182/22 195/1	Minister's [4] 42/3 42/10 42/13 87/21	
managed [5] 99/22 100/14 144/17 155/18 168/19	McCall [6] 79/4 94/8 94/18 95/6 96/1 147/6	meant [7] 55/22 81/12 82/20 82/22 123/20 187/12 200/5	ministers [6] 8/8 8/15 92/5 92/8 96/11 110/15	
managed [5] 99/22 100/14 144/17 155/18 168/19	McCall's [1] 96/5	mechanism [1] 84/20	minute [5] 71/11 80/16 198/18 203/16 204/14	
management [13] 5/12 9/3 10/17 19/16 38/15 58/20 139/19 141/13 142/1 142/2 146/23 190/20 191/8	McCormack [3] 161/10 176/20 177/5	media [4] 19/12 19/14 43/21 190/15	minutes [11] 84/10 160/12 161/14 161/16 161/23 161/24 162/2 164/18 164/18 164/19 181/2	
managing [5] 50/25 139/20 139/21 140/11 140/17	me [76] 8/25 12/6 14/2 16/10 20/15 23/20 26/10 27/9 28/4 31/19 36/10 37/2 41/11 41/25 44/17 47/24 49/14 50/4 54/12 60/13 65/8 73/16 79/20 82/22 82/23 88/15 88/24 95/3 95/7 104/4 105/8 106/2 108/19 111/13 115/20 121/8 121/12 121/16 121/21 125/6 125/22 129/9 129/9 130/2 132/1 138/5 143/9 143/24 159/12 161/15 167/2 167/12 168/19 169/17 169/19 170/5 170/6 173/12 174/9 174/12 177/5	mediation [7] 18/12 28/12 44/1 44/3 167/3 168/4 196/2	misgivings [1] 170/15	
manner [3] 37/19 97/18 168/20	mediator [1] 137/13	mediators [1] 18/13	misjudgement [1] 104/7	
manual [1] 118/13	medicine [1] 23/9	medium [1] 4/10	misleading [1] 75/13	
many [25] 17/18 17/23 24/11 24/12 24/15 24/25 25/15 107/18 143/17 151/1 165/11 165/12 165/17 165/21 167/6 167/12 167/19 168/2 168/2 170/17 170/18 171/3 175/6 194/7 195/4	medium-sized [1] 4/10	meet [10] 15/24 19/3 43/9 43/11 43/15 54/20 54/23 96/11 112/19 126/20	Misra [4] 62/7 164/23	
March [7] 63/2 100/25 109/15 142/6 147/11 147/14 151/22	meeting [48] 6/16 14/15 34/23 35/2 43/23 44/10 44/23 52/11 52/13 52/16 54/4 54/7 54/19 55/7 55/15 55/17 55/20 56/13 56/19 56/21	method [2] 38/1 111/5		
marionettes [3] 134/17 183/12 183/18		mid [1] 119/3		
Mark [9] 17/7 20/10 26/24 26/25 27/13 31/15 34/13 120/8 179/2		mid-May [1] 119/3		
marked [1] 77/10		middle [1] 124/14		
market [2] 5/2 5/3		might [54] 12/6 16/9 17/20 17/23 23/14 24/21 26/1 26/9 27/14 35/23 36/14 39/8 41/23 42/9 64/23 65/23 67/24 68/22 83/6 95/20 95/23 97/23 98/5 99/23 107/16 108/7 108/17 121/15 122/3 129/1 129/2 137/19 138/12		
marks [1] 26/1				

M	69/8 76/25 77/25 84/19 87/15 92/18 92/19 95/13 95/17 127/24 132/17 142/11 149/20 150/1 168/20 171/9 179/16 180/9 181/6 188/4 197/2 197/5 198/9 198/17 198/18 210/8	182/7 184/3 184/4 184/5 184/10 184/19 186/20 187/7 187/10 191/12 193/18 194/16 196/18 196/22 197/24 198/7 198/17 199/9 200/16 200/25 201/11 201/25 202/9 202/19 202/21 203/23 204/2 205/3 206/10 207/24 208/5 208/5 208/14 208/24 210/7 210/10 210/12 210/18 211/4 211/6 211/8	184/4 198/17 211/8 Mr Swannell [1] 184/19 Mr Swannell's [1] 186/20 Mr Swift [19] 47/18 51/18 52/2 52/19 53/20 55/5 55/23 57/17 57/21 58/1 97/22 110/21 111/20 119/8 125/6 128/21 196/22 204/2 208/5 Mr Swift's [1] 66/9 Mr Tim [1] 176/20 Mr Warmington [3] 54/8 55/19 57/6 Mrs [8] 164/24 173/21 174/3 200/19 204/20 204/23 205/18 205/24 Mrs Adedayo's [2] 173/21 174/3 Mrs Hamilton [4] 200/19 204/20 205/18 205/24 Mrs Hamilton's [1] 204/23 Mrs Oyeteju [1] 164/24 Ms [18] 9/25 13/23 61/15 61/15 61/15 81/15 83/8 83/22 106/15 110/20 124/1 124/23 164/19 164/22 200/13 200/14 210/9 211/10 Ms Alexander [1] 61/15 Ms Dickinson [1] 61/15 Ms Hailstones [1] 61/15 Ms MacLeod [5] 81/15 83/8 110/20 124/1 124/23 Ms MacLeod's [1] 83/22 Ms Page [1] 164/22 Ms Patrick [3] 164/19 200/13 210/9 Ms Vennells [3] 9/25 13/23 106/15 much [25] 1/4 2/13 2/20 12/20 31/5 53/11 53/18 71/16 107/19 114/3 114/10 133/2 138/19 143/16 156/9 156/18 156/25 161/6 164/3 164/8 168/9 170/11 173/14 174/21 195/21 mull [1] 14/17 multiple [2] 149/25 175/11	Munby [2] 91/12 100/21 must [15] 29/17 31/18 63/21 63/25 90/13 108/15 124/12 152/13 152/15 157/23 159/10 169/9 176/4 188/18 196/6 my [115] 1/17 1/20 12/15 12/19 12/22 12/23 13/3 23/14 23/18 25/25 30/12 30/18 33/2 33/24 35/1 36/2 37/3 39/20 39/25 50/12 52/23 53/1 56/18 57/8 57/11 57/23 58/1 65/17 70/23 71/9 71/13 71/16 76/11 77/14 77/25 78/10 78/25 79/3 79/12 79/20 80/4 80/13 81/5 82/5 82/13 83/11 83/15 83/17 83/24 84/7 87/20 88/20 89/16 89/23 96/21 97/15 97/22 98/5 98/14 98/25 100/11 110/3 110/4 111/6 111/7 111/8 111/12 111/13 112/2 113/19 116/10 116/20 121/24 128/20 131/8 131/12 131/25 132/9 134/11 134/18 134/25 137/11 137/19 137/22 141/13 146/12 151/12 151/23 153/12 156/13 159/10 162/23 164/3 165/25 169/7 169/10 170/3 170/8 172/9 172/15 173/13 174/8 174/24 182/17 184/5 186/7 186/25 189/3 190/7 194/23 194/25 195/17 197/3 200/16 206/14 myself [10] 38/25 44/18 135/10 144/10 147/5 154/25 170/4 172/24 197/3 198/14
Misra... [2] 178/18 182/8 miss [1] 55/16 missed [2] 75/10 84/6 mistake [1] 101/21 mistakes [3] 19/5 178/6 194/20 mistresses [1] 184/7 mixture [2] 46/23 179/11 mm [67] 6/7 6/9 6/14 7/10 7/10 9/8 9/8 9/8 9/14 17/5 17/11 21/12 22/18 22/21 23/13 28/1 30/17 32/1 34/7 34/25 34/25 36/2 41/14 44/8 51/14 51/20 54/3 54/3 61/20 61/20 62/21 62/21 91/8 107/8 112/5 113/13 127/6 130/24 139/4 139/4 156/1 156/24 157/1 157/3 157/3 157/12 160/17 161/1 161/1 161/4 162/7 164/16 166/23 176/21 181/16 184/17 184/17 184/24 185/6 187/14 187/14 191/5 198/6 198/6 201/12 209/4 209/4 mm-hm [14] 6/7 6/9 6/14 34/25 34/25 91/8 113/13 127/6 161/1 161/1 161/4 162/7 164/16 184/24 mobile [1] 44/6 moment [14] 13/10 16/21 70/25 85/11 89/19 89/21 92/1 93/6 108/2 123/5 146/13 181/22 188/10 192/21 Monday [2] 139/15 152/9 money [13] 4/23 4/23 18/23 19/7 74/21 99/1 173/15 173/15 173/17 180/17 185/23 186/17 204/25 month [3] 27/23 105/12 123/24 months [9] 6/8 12/1 14/22 15/9 19/15 22/11 65/20 163/16 190/16 months' [1] 60/14 more [44] 6/21 7/2 8/21 11/21 11/23 14/6 24/14 45/7 47/2 55/9 56/4 57/1 57/14 61/16 61/24 62/3 66/4 69/5	Moreover [1] 64/19 morning [11] 1/3 1/15 1/16 43/13 53/9 53/16 90/20 111/22 116/15 161/13 202/19 most [17] 2/8 20/24 21/4 39/21 50/11 60/4 60/21 73/13 118/11 140/7 148/10 154/12 154/13 154/16 169/19 177/11 189/1 motive [1] 83/14 motives [3] 121/14 129/6 134/22 mount [2] 99/20 180/17 mouth [1] 186/25 move [17] 13/9 16/25 33/12 40/17 40/23 42/18 52/8 53/19 100/16 103/23 106/11 123/22 129/12 135/16 147/11 168/8 186/15 moved [5] 5/7 58/17 66/7 66/8 195/8 moving [2] 33/11 170/19 MP [2] 152/1 152/18 MPs [6] 15/24 19/10 28/3 28/7 48/15 190/5 MR [119] 1/8 1/9 1/15 8/12 27/17 32/24 40/20 46/2 47/18 51/18 52/2 52/19 53/19 53/20 53/20 54/8 54/20 55/3 55/5 55/8 55/19 55/21 55/23 55/23 57/6 57/17 57/21 58/1 61/14 66/9 76/11 79/1 79/4 88/11 89/25 91/4 97/22 100/17 105/5 108/2 110/21 111/20 114/11 119/8 125/6 125/11 128/21 130/22 132/9 148/10 150/13 157/19 157/21 157/25 158/9 158/12 162/14 164/18 164/18 164/21 164/22 168/11 170/3 170/19 170/22 174/9 174/14 174/18 175/1 175/23 176/7 176/17 176/20 177/5 177/23 181/1 181/4 182/6	Mr Altman [5] 200/25 201/11 202/9 208/5 208/14 Mr Altman's [1] 202/21 Mr Beer [8] 181/4 187/7 187/10 191/12 196/18 202/19 210/10 210/18 Mr Cooper [1] 182/7 Mr de Garr [2] 125/11 130/22 Mr Henderson [1] 55/21 Mr Henry [8] 164/18 170/3 174/9 174/18 175/1 176/7 177/23 184/3 Mr Jenkins [3] 32/24 157/19 158/9 Mr Justice [2] 150/13 168/11 Mr Justice Fraser [1] 148/10 Mr Knight [1] 53/20 Mr Leighton's [1] 175/23 Mr McCall [1] 79/4 Mr McCormack [1] 177/5 Mr Parker [40] 1/9 1/15 8/12 27/17 40/20 46/2 53/19 54/20 55/8 55/23 76/11 88/11 89/25 91/4 100/17 105/5 108/2 114/11 164/22 170/19 170/22 174/14 176/17 181/1 182/6 184/5 193/18 194/16 197/24 198/7 199/9 200/16 201/25 203/23 205/3 206/10 207/24 208/24 210/7 210/12 Mr Parker's [2] 55/3 79/1 Mr Parson's [1] 132/9 Mr Seller [1] 61/14 Mr Stein [4] 164/18	naive [3] 50/17 82/6 169/10 naively [1] 39/20 name [10] 1/17 1/18 1/20 13/22 26/25 34/5 34/14 169/24 184/5 200/16 named [1] 74/17 namely [4] 12/2 61/18 139/7 142/18 narrative [2] 23/16 42/19	

N	107/24 108/8 109/14 109/17 125/17 130/8 133/16 136/11 Neville-Rolfe [26] 6/11 14/2 14/8 14/12 16/5 16/18 27/18 36/1 38/4 44/15 48/12 49/8 49/24 54/18 54/24 85/9 90/1 92/10 107/24 108/8 109/14 109/17 125/17 130/8 133/16 136/11 Neville-Rolfe's [2] 53/25 101/3 new [19] 10/16 14/13 15/6 20/19 27/10 29/18 41/10 54/11 70/3 102/18 118/3 137/21 149/13 153/2 153/4 161/12 163/24 163/25 172/17 next [10] 13/3 34/23 55/16 101/24 112/16 125/12 150/8 184/19 210/17 210/20 Nick [3] 102/18 172/24 173/13 night [1] 126/5 nine [7] 11/1 30/22 52/22 56/4 95/8 95/15 107/13 nitty [1] 198/4 nitty-gritty [1] 198/4 no [106] 9/15 14/23 15/1 15/13 17/24 18/17 27/2 30/14 30/19 31/11 31/13 31/25 32/21 40/25 41/22 55/11 56/5 58/25 68/1 68/7 70/16 74/3 76/12 76/19 77/11 77/11 77/17 78/20 80/1 80/23 83/18 83/18 85/17 86/25 87/7 88/14 89/5 89/23 90/11 90/12 90/16 90/18 92/15 95/11 95/14 97/9 100/7 104/12 108/6 108/9 108/21 109/7 113/11 115/13 116/13 117/12 117/14 119/9 121/16 122/20 128/5 131/4 131/12 131/16 131/23 132/5 132/24 132/24 133/5 133/22 135/7 136/8 136/19 137/10 138/11 153/12 158/24 161/5 161/7 171/16 171/16 173/10 173/17 174/11 176/15 179/5 181/9 187/3 192/10 192/24 192/25 193/7 193/7 193/8	193/15 193/21 193/23 195/17 200/5 200/10 201/20 204/18 206/1 207/4 207/25 210/8 nobody [3] 95/11 208/4 208/13 nodded [1] 103/15 noise [1] 199/14 non [5] 3/12 12/21 33/24 43/25 69/3 non-commercial [1] 33/24 non-criminal [1] 43/25 Non-Exec [1] 3/12 non-Scheme [1] 69/3 none [3] 79/18 137/21 180/12 nonetheless [2] 18/6 62/23 nonsense [1] 56/9 nor [3] 92/23 93/16 113/11 normal [2] 21/25 122/6 normally [1] 121/20 not [250] note [42] 7/1 13/17 17/2 17/13 17/15 19/25 20/2 20/4 20/14 20/19 20/24 21/11 21/16 21/18 22/5 22/13 22/16 22/22 24/9 24/9 26/23 27/4 27/7 27/15 31/15 40/12 63/2 104/9 106/10 106/11 106/15 148/17 148/18 183/19 183/21 187/11 187/11 187/19 191/25 202/9 202/14 203/14 noted [4] 62/24 85/18 113/4 182/2 notes [5] 20/6 34/22 35/1 35/3 106/13 nothing [9] 14/10 15/20 23/8 29/22 55/20 89/15 89/21 170/2 170/7 Notification [1] 14/4 notified [1] 16/10 notifying [1] 165/25 noting [1] 63/23 notwithstanding [6] 26/8 158/8 158/20 168/11 179/3 179/4 November [6] 105/11 140/4 160/13 161/24 162/6 162/22 now [84] 3/25 20/22 22/3 25/9 26/1 27/9 31/11 32/9 36/13 37/11 40/5 41/16 43/24 44/13 49/6	49/18 53/8 53/9 59/25 61/9 64/5 64/10 71/16 84/18 93/21 100/4 110/1 112/11 113/25 117/10 118/24 119/3 121/7 123/25 124/6 124/13 126/23 129/16 136/17 137/11 139/9 145/9 153/13 156/4 158/17 158/20 162/15 170/19 170/22 172/25 173/19 174/22 175/4 177/5 181/1 184/14 184/18 184/25 185/5 186/7 187/16 189/13 190/25 191/2 191/24 193/4 194/24 194/25 195/9 195/13 196/3 196/24 197/18 198/14 199/9 200/25 201/13 201/16 202/5 202/6 202/19 204/20 206/9 210/2 number [47] 9/10 17/16 18/25 21/7 22/24 25/7 26/14 26/16 28/17 40/23 43/16 46/17 59/23 62/12 72/22 75/11 105/18 106/24 107/11 107/18 113/4 119/20 123/18 139/25 142/1 142/3 142/7 142/8 158/17 158/23 166/21 176/19 182/3 185/25 185/25 188/24 188/25 189/12 189/13 189/14 193/11 197/10 199/1 199/20 200/17 203/21 209/13 number 1 [3] 9/10 119/20 142/3 number 2 [2] 142/7 142/8 Number 5 [1] 40/23 number 7 [1] 75/11 numbers [1] 25/19	obtained [2] 122/25 123/2 obtaining [1] 77/16 obvious [1] 173/4 obviously [24] 7/16 7/22 11/7 15/4 20/2 20/4 25/25 26/5 29/19 40/6 65/11 89/6 89/19 93/12 115/1 143/6 143/22 162/3 169/22 174/11 189/2 190/1 193/3 196/18 occasion [2] 66/12 145/25 occasionally [2] 67/12 199/2 occasions [1] 59/23 occur [5] 40/4 116/3 127/10 128/25 165/2 occurred [4] 25/9 25/11 25/17 62/5 October [9] 3/1 4/8 32/10 43/1 47/9 103/10 139/9 144/5 145/3 odd [2] 67/19 203/24 oddities [1] 69/4 odds [1] 141/2 off [13] 15/19 50/11 69/14 102/3 110/24 125/5 126/18 164/24 181/12 194/11 199/16 199/17 199/25 offences [4] 63/4 63/5 64/18 209/3 offer [2] 14/6 14/14 offered [2] 7/3 196/2 office [199] 2/9 2/10 3/1 3/5 3/16 3/22 4/4 4/7 4/9 4/21 5/4 5/7 5/9 5/18 6/4 7/2 7/6 7/12 7/22 8/2 8/5 8/19 9/2 9/12 9/16 10/4 10/11 10/22 12/22 13/19 16/7 17/12 17/15 18/6 18/20 19/11 21/5 21/24 22/23 25/14 26/2 27/22 27/23 28/7 28/11 28/20 28/21 28/23 29/7 30/13 30/16 30/19 31/12 31/25 32/18 34/9 35/4 35/16 37/17 38/4 41/8 41/20 42/25 49/3 49/12 54/5 54/11 54/12 54/13 55/3 55/14 56/8 56/16 56/23 59/14 59/23 59/25 60/3 61/22 62/3 62/10 62/18 63/13 63/21 63/24 64/2 64/9 64/16 67/18 67/21 68/1 68/24 69/17
----------	--	--	---	--

O	197/1 204/16 204/19 205/3 206/24 208/1 209/13 older [1] 191/4 on [324] once [10] 15/24 77/24 86/16 97/16 99/22 111/3 125/13 172/10 173/15 187/8 one [93] 9/25 14/6 14/17 21/7 21/16 23/19 31/24 34/14 36/11 36/12 39/21 42/2 50/1 55/7 61/18 64/8 66/12 70/3 74/11 74/14 75/10 78/6 80/3 81/9 83/2 83/3 83/13 84/6 84/21 84/23 99/25 105/2 105/6 106/7 109/20 117/2 117/2 121/15 123/6 127/7 133/5 133/5 137/20 139/6 142/21 144/24 146/10 146/18 150/16 150/22 151/8 155/3 155/22 156/14 159/11 160/2 161/10 161/25 163/10 167/21 168/1 168/17 168/25 169/13 169/19 170/11 173/8 173/14 175/11 178/18 180/18 182/4 185/23 186/14 189/8 189/12 190/9 192/15 195/20 197/10 197/12 197/20 198/17 198/18 199/22 200/23 200/24 201/18 203/18 204/20 204/22 208/8 208/25 one's [3] 95/20 175/19 175/19 ones [2] 45/24 47/17 ongoing [7] 60/11 60/15 77/13 113/8 118/19 133/11 158/5 online [2] 5/7 181/15 only [45] 19/2 25/2 26/15 39/7 43/23 45/15 59/2 63/12 72/5 79/16 79/22 81/13 81/19 84/2 84/5 87/13 88/17 89/15 90/6 107/10 108/2 111/13 122/5 123/9 138/19 148/21 172/23 181/2 185/13 185/23 191/7 198/18 200/22 200/24 203/3 203/8 203/9 204/6 204/7 204/14 204/22 204/23 207/18 208/15 209/5 onto [1] 177/2 onwards [1] 135/15 open [4] 49/7 63/14	78/23 182/10 opening [1] 171/1 openness [1] 161/12 operate [1] 28/24 operated [1] 189/6 operates [1] 4/12 operating [2] 138/14 163/19 operation [2] 26/20 109/25 opining [1] 206/21 opinion [3] 158/1 174/23 209/21 opportunity [2] 101/22 111/19 oppose [1] 63/25 opposed [1] 89/3 optics [2] 183/8 183/17 optimal [1] 10/4 optimistic [1] 71/17 option [4] 96/12 96/14 149/4 152/14 options [3] 9/18 9/24 150/10 or [213] oral [2] 78/14 79/7 orally [2] 78/13 87/16 order [7] 7/18 47/3 50/23 99/21 184/23 185/1 205/12 organisation [11] 4/17 5/14 24/22 26/3 27/10 102/22 102/23 163/15 172/22 172/23 173/3 organisation's [1] 137/7 organisations [1] 69/5 organise [1] 47/1 original [1] 120/11 originally [1] 60/25 originating [1] 206/5 orthodox [1] 140/13 ostensibly [1] 169/23 other [35] 22/14 24/16 26/12 36/13 39/3 53/3 79/24 82/12 82/15 83/16 94/12 108/1 131/24 137/12 141/13 145/5 146/11 148/8 152/18 162/25 163/8 168/2 168/14 169/2 175/15 176/24 177/3 177/16 179/18 181/7 189/9 189/14 198/1 199/25 208/25 others [8] 81/2 92/8 112/14 125/17 137/19 139/10 179/13 179/13 otherwise [3] 32/11 64/23 199/8 ought [6] 56/17 58/11	116/3 158/24 207/2 209/9 our [37] 1/11 14/11 18/15 27/22 55/24 56/8 68/25 69/7 85/8 85/10 85/25 91/17 94/7 96/13 97/25 98/6 98/8 98/10 100/24 108/11 109/20 117/6 139/16 140/2 141/4 141/5 141/10 141/15 141/19 141/21 142/21 143/4 145/16 149/7 149/7 154/3 198/14 out [72] 7/21 23/15 33/15 36/16 37/11 38/17 38/18 39/3 39/4 45/16 50/9 50/24 51/18 54/1 58/3 58/5 58/6 58/16 58/24 59/10 61/11 61/12 64/3 64/11 67/21 67/23 68/4 68/24 69/2 69/6 69/8 71/24 72/12 72/19 72/25 73/13 75/10 75/18 81/11 82/7 83/5 87/17 95/20 106/24 107/10 107/13 110/1 111/23 112/3 122/7 132/8 133/22 141/2 141/11 151/9 155/5 163/16 163/18 168/1 169/25 170/21 173/4 178/5 181/10 181/18 183/24 187/15 188/4 192/15 194/25 204/11 205/19 outcome [8] 35/5 88/6 96/4 100/2 100/13 107/16 139/7 168/14 outgoing [2] 11/5 11/12 outline [2] 110/4 113/22 output [5] 57/21 95/6 137/5 143/21 154/1 outputs [5] 71/14 81/4 116/11 146/9 208/8 outset [3] 131/7 150/22 165/11 outside [2] 125/24 160/25 outstanding [1] 43/25 over [43] 3/4 4/8 12/9 12/14 18/21 21/17 24/7 24/11 24/22 25/3 26/16 37/10 44/6 60/24 61/10 63/1 68/15 72/25 75/20 85/11 96/8 100/19 104/21 112/6 112/6	113/23 118/9 119/12 126/18 141/3 141/17 149/22 152/5 153/3 160/8 160/19 167/13 178/2 179/18 185/1 187/25 188/18 199/23 overall [7] 59/11 75/22 96/4 96/19 107/16 113/14 187/19 overcome [1] 180/6 overheads [1] 5/12 overlap [1] 132/10 overloading [1] 64/18 overlook [1] 104/24 overly [1] 154/12 overnight [1] 173/7 overseen [1] 18/12 owe [2] 82/16 209/15 owed [1] 155/23 own [10] 12/23 43/20 66/3 69/7 74/16 127/25 165/5 165/7 198/9 198/22 owned [1] 11/9 ownership [1] 112/1 Oyeteju [1] 164/24
			P	
			pack [2] 176/19 179/2 page [88] 1/24 2/13 2/14 5/22 5/23 9/9 9/23 13/12 13/17 13/21 14/7 15/16 15/17 17/1 18/21 20/7 20/9 20/18 21/17 29/10 34/2 37/10 40/14 42/20 44/6 47/7 47/13 47/13 48/10 52/8 59/10 59/19 60/24 61/10 61/17 63/1 66/15 67/11 67/11 72/9 75/11 75/20 78/21 104/1 104/2 106/16 112/6 112/13 112/13 118/20 118/20 119/12 120/3 120/6 123/22 126/2 126/18 126/19 129/13 135/17 135/18 136/1 136/9 139/9 141/8 145/3 145/7 147/13 149/22 151/20 151/24 152/5 152/6 157/6 157/6 157/7 157/13 157/16 160/19 160/19 164/22 187/8 189/20 191/23 198/22 205/2 205/7 206/13 page 1 [10] 15/16 20/7 29/10 40/14 118/20 126/2 126/19 141/8 157/13 191/23	

P	69/15 paragraph 173 [1] 74/10 paragraph 2 [3] 36/14 48/11 59/20 paragraph 20 [1] 149/5 paragraph 28 [1] 30/3 Paragraph 3 [1] 60/2 paragraph 4 [1] 50/22 paragraph 40 [1] 47/22 paragraph 5 [1] 148/20 paragraph 59 [1] 198/22 paragraph 65 [1] 110/25 paragraph 85 [1] 54/9 paragraphs [5] 140/19 191/25 195/19 205/4 205/7 paragraphs 106 [1] 205/7 paragraphs 55-57 [1] 140/19 parallel [1] 132/19 paraphrase [1] 37/22 parcels [1] 5/2 pardon [2] 40/19 80/10 Parker [68] 1/5 1/7 1/9 1/15 1/20 6/17 7/1 8/12 15/20 27/17 34/23 35/2 37/9 37/11 37/14 37/15 37/24 38/2 38/8 40/20 46/2 53/19 54/12 54/20 55/8 55/23 76/11 78/24 88/11 89/25 91/4 92/6 100/17 105/5 106/22 108/2 108/6 114/11 130/7 133/11 133/12 134/10 162/14 164/3 164/22 170/19 170/22 174/14 176/17 181/1 182/6 184/5 192/1 193/18 194/16 197/24 198/7 199/9 200/16 201/25 203/23 205/3 206/10 207/24 208/24 210/7 210/12 211/2 Parker's [6] 35/5 55/3 79/1 91/24 94/15 134/10 Parliament [3] 19/14 190/12 190/15 Parliamentary [3] 19/12 101/17 153/4 Parson's [1] 132/9	Parsons [2] 21/13 129/17 part [35] 7/4 32/10 33/7 42/18 43/8 44/19 48/2 72/9 74/14 83/22 84/24 93/23 100/24 121/8 123/3 131/19 133/3 133/7 133/10 141/19 141/21 143/4 145/16 153/10 160/8 160/10 165/15 179/14 191/4 196/11 196/13 197/22 197/22 198/21 204/22 part-time [1] 197/22 Participants [3] 152/1 164/5 164/23 particular [11] 50/9 53/25 57/18 62/16 68/13 69/17 74/22 79/17 179/13 185/16 209/8 particularly [9] 19/14 31/11 43/17 45/2 56/2 112/24 133/15 140/18 190/15 parties [11] 43/6 43/10 43/17 43/19 115/19 116/2 116/13 140/22 142/4 142/12 145/10 partly [4] 45/9 45/11 165/16 175/18 partner [1] 129/17 parts [3] 2/23 17/7 139/17 party [6] 68/19 72/12 72/19 74/17 89/7 137/13 pass [1] 31/3 passages [3] 59/13 61/21 67/8 passed [3] 108/7 108/17 108/21 passing [2] 65/4 69/15 past [7] 32/25 42/7 49/9 59/17 70/13 141/4 195/23 Patrick [12] 34/15 34/16 120/8 136/4 138/1 138/4 164/19 200/13 200/14 200/16 210/9 211/10 patterns [2] 67/23 68/19 Paula [21] 9/13 9/15 10/3 10/6 11/3 11/14 12/18 13/2 13/25 20/14 22/13 27/4 27/15 29/9 42/21 44/9 93/4 103/17 145/24 146/8 187/12 Paula's [2] 10/17	10/21 pause [2] 8/10 8/11 paused [1] 125/4 pay [1] 58/11 payable [1] 99/1 paymasters [1] 98/7 payments [1] 35/8 peak [3] 108/7 108/17 108/22 penultimate [3] 92/21 108/3 166/13 Penultimately [1] 158/22 people [110] 10/17 18/3 18/7 18/8 19/5 19/6 20/4 23/4 23/24 24/1 24/5 24/6 24/12 24/15 24/22 24/25 25/7 25/14 25/15 25/19 25/23 26/5 26/7 26/9 29/24 31/2 31/3 39/19 39/22 39/24 44/22 44/23 52/6 58/6 66/3 73/14 80/2 81/14 81/23 81/23 81/24 89/20 90/12 105/22 106/5 115/2 120/8 120/10 121/20 121/25 122/4 122/7 123/8 123/10 123/14 123/18 128/12 129/8 129/9 130/4 132/3 142/15 142/21 146/11 154/16 165/4 165/11 165/12 165/17 165/20 165/21 167/2 167/6 167/11 167/12 167/19 167/20 167/25 168/2 169/16 171/3 171/4 171/7 171/8 171/18 171/23 173/1 176/10 177/3 177/14 178/2 179/8 179/12 180/9 184/7 188/24 188/25 189/4 189/10 191/14 191/14 192/4 192/5 192/18 192/19 197/4 199/13 203/20 203/22 209/2 people's [1] 138/14 per [2] 23/10 63/8 per se [1] 63/8 percentages [1] 203/19 perception [1] 116/16 perfect [1] 76/3 perfectly [3] 56/7 100/12 104/22 perform [2] 39/1 144/1 performance [5] 8/24 10/9 10/21 11/6 12/3 performative [1] 170/23	Performing [1] 34/17 perhaps [25] 31/1 39/20 41/7 50/17 71/21 82/6 82/18 83/1 83/5 87/11 121/2 121/14 127/17 129/6 167/10 168/21 169/10 177/13 178/17 183/18 189/20 194/10 194/10 194/11 199/18 period [5] 4/4 26/16 61/7 118/10 199/23 periods [1] 22/1 Perkins [1] 3/4 Permanent [1] 100/22 persists [2] 172/20 172/21 person [18] 9/16 10/4 15/13 33/17 33/18 33/21 33/22 33/25 39/3 45/4 46/16 50/5 52/24 58/10 115/5 125/7 208/16 209/5 personalities [1] 10/18 personality [1] 45/22 personally [5] 33/14 82/22 82/23 88/18 176/25 personnel [2] 73/2 75/15 persons [1] 112/17 perspective [11] 20/4 24/2 66/1 85/15 85/17 87/1 105/16 144/14 162/15 183/6 189/3 persuasive [2] 130/10 130/14 Peters [2] 182/2 182/3 phase [1] 117/25 phenomenon [1] 64/23 phrase [1] 120/1 phrases [1] 131/24 physical [3] 85/18 87/2 87/8 physically [3] 87/9 87/10 90/15 pick [2] 46/2 119/7 picked [3] 119/25 145/20 199/20 picture [3] 26/8 31/20 70/4 pictures [1] 31/23 piece [12] 38/22 76/3 76/4 77/23 87/14 111/23 123/9 126/23 130/2 134/4 138/10 138/12 pieces [1] 134/19
----------	--	--	--	--

P	79/24 93/19 93/21 95/1 95/2 95/3 95/24 102/16 103/9 104/9 104/11 104/14 108/1 108/3 108/17 109/6 111/15 111/25 113/19 115/25 119/21 123/1 123/6 124/12 134/25 142/3 143/13 143/23 144/16 145/21 152/7 154/24 156/4 159/19 159/21 161/8 165/10 165/25 166/23 167/8 168/18 170/16 172/9 177/9 177/22 180/3 180/13 181/17 183/13 183/19 186/3 186/4 186/24 189/14 191/2 197/19 200/3 201/23 204/11 207/22 208/4 points [15] 20/13 39/23 50/11 64/3 87/17 107/25 107/25 132/14 132/18 141/14 148/23 148/25 154/4 177/25 199/21 POL [4] 2/2 89/10 131/17 199/7 POL's [1] 94/16 POL00006355 [1] 59/5 POL00006357 [1] 157/4 POL00022854 [1] 205/2 POL00023898 [1] 147/13 POL00024913 [1] 109/13 POL00031104 [1] 166/8 POL00065606 [1] 34/1 POL00102551 [1] 27/18 POL00103108 [1] 85/4 POL00103190 [1] 116/18 POL00103214 [1] 123/22 POL00103351 [1] 139/8 POL00103352 [1] 145/2 POL00103446 [1] 151/19 POL00114270 [1] 47/7 POL00117516 [1] 42/19 POL00158304 [2] 103/21 106/10 POL00167395 [1]	160/12 POL00174396 [1] 22/10 POL00174397 [2] 22/22 187/8 POL00231055 [1] 21/9 POL00241554 [1] 120/2 POL00242402 [1] 129/12 POL00242552 [1] 135/16 POL00319054 [1] 16/25 POL00337435 [1] 182/4 political [2] 134/9 135/4 politically [2] 8/6 8/13 polluted [1] 183/9 population [5] 165/18 165/21 168/2 188/24 203/13 populations [1] 203/20 portion [1] 166/19 pose [2] 69/17 108/24 posed [2] 120/21 120/24 position [18] 5/17 57/5 63/17 65/5 72/16 96/3 96/18 125/16 137/7 140/13 149/8 161/5 162/15 199/6 199/11 200/7 208/16 209/8 positive [4] 12/11 15/6 96/6 96/19 positively [1] 199/6 possibilities [2] 88/17 197/10 possibility [5] 68/5 69/9 71/23 133/15 148/15 possible [19] 12/10 69/6 72/1 72/5 72/14 72/21 73/4 74/20 74/23 75/14 83/14 86/7 89/7 106/25 107/1 112/22 113/22 149/19 187/25 possibly [3] 54/25 149/20 207/17 post [227] post-appointment [1] 42/19 post-the [2] 159/17 185/22 Postmaster [2] 126/6 135/20 postmasters [6]	17/16 22/25 25/4 99/19 102/20 151/1 pot [2] 182/7 182/21 potential [7] 29/14 32/6 67/15 101/20 127/2 153/8 155/20 potentially [14] 24/14 24/16 39/5 40/2 66/3 69/8 74/11 76/13 84/24 87/24 110/16 128/9 142/23 186/23 pounds [1] 4/23 power [3] 193/20 195/1 195/3 powers [2] 19/17 190/24 PR [3] 141/19 142/22 145/16 practical [3] 55/22 71/2 150/11 practically [2] 72/2 100/11 practice [4] 1/11 81/25 118/14 119/13 pre [3] 8/22 15/14 55/7 pre-appointment [1] 8/22 pre-booked [1] 55/7 preceded [1] 74/8 precipitated [1] 167/14 precisely [2] 55/6 56/20 precludes [1] 174/12 predetermine [1] 35/4 predominantly [1] 45/24 prefer [1] 174/22 prejudge [1] 65/16 prejudice [2] 179/7 179/8 preliminary [1] 148/17 preparation [2] 100/24 141/5 prepare [1] 126/17 prepared [4] 101/1 150/3 179/1 179/2 present [6] 3/13 52/17 84/1 137/6 160/14 182/6 presentation [1] 9/2 presented [3] 31/23 130/9 130/14 presenting [2] 118/16 119/15 presently [1] 26/14 preserving [1] 101/11 President [1] 147/23 press [1] 108/16 pressing [2] 21/8	28/5 pressure [5] 43/5 66/3 132/16 132/16 206/6 pressurised [2] 61/25 64/21 presumably [5] 15/12 31/14 48/6 120/23 161/5 presume [4] 16/8 48/9 84/4 144/9 pretending [1] 88/16 pretty [16] 14/10 14/24 15/3 15/7 16/15 36/15 41/1 47/11 65/10 76/10 76/10 82/7 93/4 148/25 155/8 197/17 prevent [2] 82/1 102/8 prevented [3] 81/8 82/11 83/10 previous [6] 23/10 45/10 108/11 162/24 166/18 182/12 previously [5] 5/4 94/17 109/15 140/10 147/20 primary [1] 146/14 principal [1] 61/6 principally [2] 36/1 36/20 principle [3] 148/4 201/22 201/24 prior [1] 52/11 prioritise [1] 21/6 private [1] 6/4 privilege [33] 71/11 78/25 79/2 80/19 81/21 82/19 83/9 84/13 84/18 85/19 85/21 87/4 87/11 87/19 87/23 88/12 88/13 88/18 88/21 88/25 89/8 89/8 89/11 89/22 90/5 101/11 102/7 110/9 113/18 116/14 116/17 133/14 207/6 privileged [27] 77/4 77/8 77/10 77/20 77/23 78/6 78/11 79/21 80/3 80/8 80/12 81/1 81/7 81/12 81/12 81/17 82/23 88/1 88/5 88/8 88/24 88/24 89/1 89/12 91/15 133/1 133/8 probably [35] 5/20 12/20 15/3 31/3 31/5 31/21 44/17 44/24 50/5 52/24 55/11 60/23 69/13 71/17 71/24 81/11 84/7 87/6
----------	--	--	--	--

P	149/18	providing [3] 20/5 90/3 206/1	41/17 42/6 47/19 49/7 49/8 49/21 57/1 63/3 76/11 77/2 78/8 79/4 79/7 83/8 86/2 89/14 89/25 105/5 105/8 105/11 105/14 105/24 108/18 111/16 118/17 127/13 127/22 128/16 129/4 131/9 132/5 140/15 143/1 143/5 143/9 144/1 144/13 156/13 162/10 162/20 165/8 165/20 167/10 172/9 172/14 181/24 182/1 184/15 191/12 192/24 193/1 193/6 194/12 194/23 198/17 205/21 207/23 208/10 209/1 209/17 209/20	R
probably... [17] 88/22 95/5 113/22 132/14 132/17 150/6 159/8 159/17 171/8 177/12 179/15 179/25 186/6 200/1 202/3 202/4 203/25	progressively [1] 142/10	public [9] 4/16 7/7 18/23 19/4 43/22 44/19 58/23 63/21 71/6	racking [1] 137/19	
problem [22] 24/18 25/6 26/19 41/23 45/14 66/2 68/22 70/24 97/25 97/25 98/8 98/9 108/6 108/13 108/21 128/1 165/14 167/1 181/21 187/22 191/3 200/8	projected [1] 118/24	publication [2] 145/25 161/13	raft [1] 160/7	
problems [10] 70/23 105/21 151/8 160/8 163/1 180/1 180/4 189/5 189/12 189/14	prompt [1] 206/25	publicly [4] 11/9 30/16 76/15 86/19	raise [2] 74/19 148/22	
procedural [3] 141/3 148/6 149/3	promptly [1] 149/6	purely [3] 68/21 166/2 183/6	raised [17] 13/5 26/1 27/1 28/6 30/5 32/5 32/17 42/16 48/15 60/1 62/12 62/14 74/14 76/6 89/17 150/14 156/20	
procedurally [1] 156/3	proper [2] 36/25 206/16	purported [1] 145/15	raising [1] 191/12	
proceed [2] 149/12 150/2	proportionate [1] 161/22	purpose [13] 35/12 36/10 36/16 36/19 37/1 37/3 59/23 60/25 70/9 77/13 111/16 141/1 170/20	ramifications [1] 127/20	
proceedings [7] 113/10 125/1 160/21 160/24 160/25 168/20 169/11	proportionately [1] 25/1	purposes [5] 77/15 126/8 126/15 140/24 142/19	range [10] 4/14 5/9 46/15 54/2 75/22 175/13 175/20 197/12 198/25 199/16	
process [13] 18/20 20/8 22/4 28/19 51/4 51/23 52/14 52/17 52/20 81/14 118/1 118/4 180/2	proposal [1] 205/11	persue [1] 63/12	rap [1] 141/17	
processes [7] 37/19 49/2 49/9 102/22 106/23 118/12 140/23	propose [1] 150/5	pursued [1] 172/4	rapidly [1] 188/19	
processes [7] 37/19 49/2 49/9 102/22 106/23 118/12 140/23	proposing [1] 201/5	pursuing [1] 111/4	rather [19] 2/9 23/16 25/10 26/13 45/7 45/19 47/4 47/22 57/17 58/11 63/8 93/15 108/22 114/21 115/23 125/20 128/8 162/4 198/3	
prod [1] 143/7	pros [1] 38/17	pushed [1] 194/14	rationale [6] 43/20 62/25 94/17 132/24 134/23 137/2	
produce [1] 58/2	prosecute [3] 19/2 19/5 19/6	put [34] 19/21 24/5 24/8 52/7 58/24 59/1 79/15 87/9 94/22 95/3 95/20 96/10 107/12 131/4 136/14 137/9 148/18 149/13 155/3 155/20 162/23 163/8 163/20 164/1 165/4 165/8 166/8 173/9 173/25 179/21 186/25 193/3 208/10 209/7	re [2] 14/4 126/15	
produced [6] 23/5 53/20 65/10 66/1 97/5 201/1	prosecuted [8] 17/22 24/7 25/15 25/19 25/23 48/8 165/3 172/4	puts [1] 121/10	re-instructed [1] 126/15	
producing [1] 154/1	prosecuting [2] 48/3 198/8	putting [7] 32/23 57/9 134/19 137/14 137/24 163/21 203/19	reach [1] 132/20	
product [6] 22/8 22/9 116/14 116/16 138/9 183/9	prosecution [12] 18/20 32/24 62/17 64/5 67/1 118/14 119/12 157/10 157/20 205/18 205/22 206/5	QC [18] 2/4 30/10 45/5 45/13 46/22 48/1 77/7 92/11 92/14 101/2 108/5 124/25 125/8 130/18 131/3 131/4 196/24 200/25	reached [3] 64/7 82/1 172/10	
production [1] 53/23	prosecutions [10] 18/16 18/22 19/4 25/16 32/20 42/5 59/16 73/22 156/22 158/11	QC's [6] 91/22 91/25 92/23 92/24 94/15 94/19	reaction [5] 71/9 150/16 152/11 154/8 159/25	
productive [1] 59/8	prospect [2] 63/20 67/5	quagmire [1] 181/8	reactive [1] 141/5	
products [2] 4/14 5/9	prosperity [1] 102/12	qualified [11] 37/4 39/19 39/24 53/5 65/9 68/19 72/12 72/18 72/24 128/12 128/23	read [48] 6/10 7/9 15/11 17/7 24/9 27/20 30/3 36/4 36/18 36/23 37/7 38/6 41/1 41/3 41/16 41/17 42/13 47/21 54/8 61/2 61/21 62/6 67/9 82/21 83/23 91/22 97/24 100/18 123/17 139/12 141/9 142/10 145/6 145/9 146/3 172/24 177/7 177/8 192/15 203/6 203/8 203/11 204/17 204/17 205/9 207/14 207/15 210/5	
professional [3] 38/9 38/19 110/9	protect [1] 83/19	quashed [3] 173/24 174/14 200/18	Read's [1] 102/18	
professionals [1] 38/20	prove [2] 171/12 171/22	quashing [1] 35/8	readily [2] 61/23 62/3	
profound [1] 158/10	proved [1] 97/19	queries [1] 7/8	readiness [1] 17/3	
programme [11] 10/14 13/18 13/19 14/19 19/18 19/19 19/22 19/22 22/14 28/4 190/3	provide [10] 12/17 51/2 51/22 63/20 85/25 86/13 86/15 134/9 135/4 161/15	question [69] 23/22 26/1 27/8 30/24 37/13 37/16 41/4 41/15	reading [4] 64/25 74/1 159/8 202/6	
progress [4] 85/10 86/14 116/21 178/19	provided [32] 1/21 19/20 19/23 32/13 59/17 60/4 60/5 60/21 68/7 69/21 75/14 77/12 77/15 79/7 85/19 87/3 93/8 107/5 107/6 109/18 109/21 110/9 116/22 117/7 117/13 119/2 121/17 126/14 128/17 158/6 159/25 202/6	quotes [1] 185/24	reads [1] 134/12	
progressing [1]			ready [1] 78/9	

R	104/10 106/20 113/9 113/12 120/10 125/13 134/3 135/13 139/15 152/23 168/12 193/23	139/12 203/6 208/6 reconciliation [1] 69/4 reconciliations [1] 118/13 reconsider [1] 64/6 reconstitute [1] 163/9 record [2] 25/21 205/13 recorded [5] 11/13 26/21 123/13 154/8 207/1 records [6] 68/2 68/4 70/6 72/22 117/11 118/12 recourse [1] 99/18 recover [1] 62/3 recusal [15] 147/12 148/13 149/8 149/23 150/6 150/13 152/19 153/9 153/11 155/10 168/10 168/25 169/8 169/17 170/14 recuse [7] 147/18 148/12 149/5 150/4 150/18 153/23 154/9 recused [4] 151/5 153/15 154/25 170/17 red [2] 199/19 204/8 redacted [3] 82/25 92/2 161/13 redefined [1] 125/4 reduce [1] 176/3 reduced [1] 105/12 reel [1] 199/25 refer [4] 14/5 111/7 111/8 185/15 reference [20] 8/3 27/24 37/5 37/16 37/25 41/4 48/11 49/21 50/20 52/4 52/7 60/8 75/12 76/1 112/4 142/22 146/21 161/2 166/13 182/4 referenced [1] 68/23 references [3] 50/10 189/25 190/5 referral [1] 207/3 referred [4] 63/22 109/21 136/23 188/14 referring [4] 85/23 145/19 192/13 195/8 refers [4] 94/3 148/18 160/23 185/14 refining [1] 141/4 reflect [12] 31/20 74/21 110/23 119/1 123/11 123/13 123/20 168/15 172/6 174/16 202/5 202/8 reflected [2] 84/9 108/21 reflecting [1] 170/22	reflection [6] 16/9 40/4 40/6 47/5 86/20 183/19 reflections [1] 25/8 reflective [3] 55/11 108/1 108/12 reflects [1] 183/22 reframing [1] 41/18 refresh [2] 201/5 201/7 refused [1] 10/12 regard [2] 58/11 89/16 regarding [7] 27/23 28/7 29/12 48/25 141/18 166/1 188/19 regret [1] 71/16 regrets [1] 80/4 regular [2] 86/13 116/20 regularly [1] 116/22 reign [1] 18/13 reject [2] 74/2 174/6 rejecting [2] 19/13 190/11 rejects [1] 139/16 related [8] 24/10 24/17 37/18 86/8 89/25 107/3 127/8 204/24 relates [2] 74/11 74/15 relating [3] 30/6 157/10 157/14 relation [15] 11/14 30/11 86/8 93/2 94/14 112/25 117/6 117/22 124/5 145/12 186/16 188/23 198/14 198/19 198/22 relationship [3] 75/3 117/1 118/8 relationships [4] 10/7 10/20 105/22 172/14 relative [1] 165/18 relatively [7] 25/6 54/11 125/13 140/20 153/2 153/3 204/12 release [1] 170/3 relevant [14] 6/12 15/11 26/16 67/3 69/2 72/12 102/8 102/14 115/19 116/12 118/9 118/11 139/24 146/10 reliability [2] 168/23 200/6 reliable [3] 98/15 167/17 181/21 reliance [4] 48/16 56/10 56/22 148/8 reliant [2] 165/5 168/10 relied [4] 7/16 56/17	179/9 209/13 reluctant [1] 43/16 rely [3] 128/15 149/2 203/16 relying [2] 58/23 204/3 remain [2] 158/19 172/2 remained [1] 3/12 remaining [2] 102/25 120/17 remains [3] 97/15 112/23 149/24 remarkably [1] 199/13 remarks [2] 57/4 141/7 remedy [1] 102/25 remember [38] 5/19 6/12 11/15 17/8 34/3 34/5 34/9 34/10 34/12 34/13 34/16 34/17 55/5 56/13 89/13 95/24 96/23 106/19 119/20 133/24 134/2 136/18 138/8 142/24 146/9 146/20 153/16 157/2 159/9 163/15 166/6 178/14 182/15 187/4 202/7 202/22 202/23 206/25 remind [2] 102/10 135/17 reminding [3] 49/11 104/18 196/3 remote [6] 70/14 70/21 70/24 71/23 71/25 72/4 remotely [4] 70/1 70/5 70/19 71/2 removal [1] 9/25 renamed [1] 184/11 repaid [1] 75/5 repay [1] 206/3 repayment [3] 204/24 205/14 205/24 repeatedly [2] 187/17 197/25 replayed [2] 97/22 98/5 replied [2] 146/3 152/8 reply [4] 14/7 136/2 145/7 161/9 report [120] 15/20 32/13 32/14 47/1 51/7 51/12 51/25 53/19 53/23 55/25 56/7 56/9 56/16 56/17 56/23 58/2 58/7 59/12 59/13 60/9 60/16 65/18 66/1 66/9 66/16 70/11 70/14 71/12 71/15 72/9 74/15 76/21
----------	--	---	--	--

R	required [8] 42/3 45/23 67/24 75/23 86/9 99/20 144/18 155/17	resulting [1] 145/25	61/12 83/6 110/21 160/4 202/15 204/4	7/3 14/22 27/22 29/2 34/19 39/1 102/11 115/17 115/19 115/21 116/3 143/9 144/1 144/21 153/14 155/1 188/18 198/2 198/5
report... [88] 76/24 77/7 77/9 77/12 77/17 78/5 78/11 79/12 79/14 79/18 79/21 80/1 80/2 80/5 80/11 80/11 80/19 80/22 81/1 81/6 81/8 81/13 81/17 81/19 81/21 82/3 82/4 82/8 82/11 82/15 82/20 82/22 83/9 83/15 83/25 84/2 84/13 84/14 84/15 85/5 85/21 87/18 90/3 90/11 90/14 91/22 91/25 92/23 92/24 93/4 93/11 93/15 93/24 94/20 94/24 101/1 101/12 103/6 103/17 106/20 106/23 106/24 107/10 108/5 108/20 109/5 109/6 109/18 111/22 111/25 113/2 113/23 115/20 116/7 116/8 117/13 117/16 119/1 120/11 121/6 127/5 127/21 128/22 138/7 166/25 196/11 198/20 203/3	requirements [1] 186/12	resume [1] 210/17	reviews [2] 50/6 132/19	Rolfe [26] 6/11 14/2 14/8 14/12 16/5 16/18 27/18 36/1 38/4 44/15 48/12 49/8 49/24 54/18 54/24 85/9 90/1 92/10 107/24 108/8 109/14 109/17 125/17 130/8 133/16 136/11
reported [4] 94/17 113/9 142/17 183/14	reside [2] 179/25 180/1	retail [1] 167/21	revisions [1] 10/14	Rolfe's [2] 53/25 101/3
reporting [4] 52/15 92/4 92/7 154/21	resolve [3] 49/4 140/21 178/23	retained [1] 10/8	rewrite [1] 37/12	Ron [2] 54/4 57/4
reports [6] 32/13 32/15 73/18 110/7 124/23 176/9	resolved [4] 28/3 32/4 99/17 181/5	retention [1] 21/25	rewritten [1] 41/15	room [2] 164/14 182/24
represent [2] 164/22 200/16	resolving [2] 28/11 153/3	retrospect [1] 121/2 122/3 169/10 169/18	Richard [3] 13/21 13/24 15/18	root [3] 179/23 179/24 180/1
representative [2] 144/25 153/14	resort [1] 165/6	return [2] 66/22 206/4	right [76] 3/9 3/19 4/1 4/2 5/16 9/16 10/9 18/22 21/16 22/6 49/23 65/6 76/19 80/23 87/24 92/15 100/1 100/9 100/12 104/2 109/11 113/15 115/10 115/14 116/22 121/17 121/24 122/4 122/7 127/12 128/11 128/19 129/7 129/11 134/11 154/8 154/14 155/11 162/20 162/20 163/20 163/22 164/1 164/20 165/19 166/11 169/7 173/10 174/19 174/22 177/13 178/17 179/22 186/3 186/11 186/18 188/1 188/8 189/13 189/25 190/13 191/14 191/20 191/23 193/18 194/2 195/5 195/13 196/3 196/5 196/17 198/23 200/9 204/11 207/16 207/21	roughly [2] 25/22 25/23
representatives [1] 43/6	respect [4] 61/5 74/17 154/14 178/6	revealed [3] 27/6 72/15 162/8	right-hand [2] 10/9 21/16	Royal [2] 4/25 5/1
represented [2] 138/5 206/7	respects [2] 179/17 179/18	reveals [2] 117/14 159/3	rightly [1] 18/24	rule [3] 69/8 102/6 140/5
repudiate [1] 174/17	respond [4] 48/14 119/24 120/15 121/5	revelatory [1] 138/13	rights [1] 149/7	ruling [1] 145/17
repurposed [4] 65/21 133/7 134/2 138/8	responded [2] 37/17 197/15	review [134] 9/11 18/11 18/15 28/17 30/12 35/10 35/12 35/23 36/8 36/10 36/12 36/13 36/16 36/19 36/25 37/1 38/19 45/5 45/7 45/10 45/17 48/22 48/23 48/24 49/15 49/19 50/4 50/6 50/23 51/3 51/4 51/11 51/11 51/15 51/19 51/22 51/23 52/3 52/15 52/21 52/25 53/1 53/19 53/22 57/9 57/20 58/10 58/11 58/18 58/25 59/4 59/5 59/24 60/6 60/9 60/13 60/25 63/22 64/3 64/5 64/14 65/4 65/25 67/1 68/13 72/19 72/25 75/2 75/24 76/6 77/4 79/6 79/9 79/10 92/11 94/15 99/25 100/20 101/18 106/13 106/18 107/7 109/24 110/2 111/6 111/9 111/10 111/13 111/18 112/2 112/8 114/12 116/21 118/4 118/15 119/15 119/19 125/16 125/18 126/9 126/11 126/23 127/7 133/6 134/7 134/11 135/3 135/23 136/13 136/16 137/8 137/12 137/16 138/20 157/23 161/17 195/23 196/8 196/12 196/15 197/8 198/20 198/21 198/23 199/9 200/24 201/2 203/2 203/6 207/16 207/21 208/9 208/11 208/15	rigour [1] 107/2	run [5] 173/3 180/19 183/24 186/6 186/8
reputation [4] 37/20 64/9 142/24 154/6	responses [1] 143/14	review's [2] 37/8 52/13	running [2] 12/24 60/7	
reputational [5] 76/7 76/13 76/14 76/20 108/24	responsibilities [2] 18/7 194/17	reviewed [7] 51/5	rushed [1] 178/18	
request [12] 16/12 48/21 49/13 49/23 79/14 83/25 84/25 85/22 101/3 133/18 134/14 147/18	responsibility [12] 63/13 111/14 114/16 114/18 114/23 115/6 170/4 178/5 181/19 185/21 209/15 209/23		safe [1] 42/6	
requested [1] 125/2	responsible [4] 101/19 114/13 180/25 198/8		safer [1] 133/2	
requesting [1] 29/1	responsibly [1] 29/1		safety [3] 66/20 127/9 183/15	
requests [2] 161/11 177/2	rest [4] 101/7 173/12 207/15 207/20		said [67] 5/25 5/25 8/12 21/19 44/18 44/21 44/25 54/8 54/9 56/2 56/21 57/6 57/6 57/13 58/11 61/23 65/13 71/22 72/6 78/2 78/6 78/24 83/23 84/5 84/9 84/13 88/5 93/7 95/12 97/24 98/2 98/7 106/12 107/16 108/5 109/4 114/24 115/9 123/3 123/19 125/6 125/14 128/18 131/7 136/20 138/17 140/13 142/4 142/22 155/8 156/15 168/18 170/15 175/24 181/20 182/7 182/10 183/17 187/16 188/12 189/13 194/4 195/6 197/24 204/10 204/13 208/25	
require [3] 132/17 140/1 149/25	restricted [1] 79/22		Sajid [1] 6/5	
	restriction [1] 82/20		sale [1] 49/1	
	result [19] 28/9 52/6 65/23 79/7 80/24 85/19 87/3 87/18 90/5 98/24 100/9 100/15 106/2 135/13 145/23 148/6 156/3 162/9 183/3		Sam [1] 184/5	

<p>S same [16] 3/7 4/18 7/25 42/18 75/7 94/17 100/14 120/10 120/12 123/4 124/8 145/3 145/7 146/2 151/1 197/25 Samsonite [4] 3/7 3/8 3/10 3/13 Santander [1] 74/18 Sarah [2] 91/12 100/21 sat [2] 99/6 123/18 satisfactory [6] 65/7 65/14 65/24 171/16 171/22 181/9 satisfied [1] 112/18 satisfy [1] 92/16 saved [1] 79/18 saw [9] 11/25 27/16 27/25 117/2 133/23 196/11 196/16 206/21 210/2 say [110] 1/10 5/15 8/17 9/24 14/12 15/5 20/3 20/6 21/6 21/7 24/3 24/21 27/9 31/6 36/14 41/23 42/10 43/1 45/16 46/20 46/22 46/23 47/23 50/15 51/17 51/21 52/2 57/5 57/10 57/12 58/22 58/25 62/20 71/25 76/19 77/12 77/15 78/4 79/16 83/14 84/17 87/12 87/13 88/20 89/15 93/9 93/11 97/1 97/15 103/17 103/22 106/4 107/17 107/19 108/8 109/19 111/21 112/2 118/21 122/3 122/13 122/23 127/23 133/10 134/6 135/2 139/18 141/8 141/22 143/2 143/7 151/14 155/12 159/16 161/5 167/5 167/8 171/2 171/5 171/10 171/17 172/24 173/1 173/5 174/18 174/22 175/11 175/16 176/5 176/6 177/19 178/7 179/7 179/10 179/17 182/8 183/15 185/20 195/9 196/14 197/8 198/18 201/4 201/7 201/9 201/22 202/2 203/24 207/25 208/14 saying [26] 17/23 32/2 41/12 55/14 56/15 56/23 95/8 99/10 99/21 100/3</p>	<p>100/7 100/7 100/10 121/24 128/19 136/2 146/2 146/3 177/1 186/3 187/3 187/3 188/7 193/20 193/22 197/2 says [28] 2/2 30/3 36/4 36/18 40/20 55/1 55/19 78/22 91/13 92/21 99/7 117/5 124/1 126/4 129/19 134/5 135/1 139/11 147/15 151/22 157/17 161/11 177/19 192/1 193/10 196/7 198/21 205/10 scale [8] 23/22 26/19 29/22 165/10 165/14 165/17 188/22 197/14 scenario [1] 149/19 scene [1] 4/21 scenes [2] 121/9 121/13 scheduled [2] 43/25 100/25 scheme [17] 18/12 28/12 44/3 59/18 62/4 62/12 62/16 67/22 68/4 68/8 68/18 69/3 69/10 72/13 74/12 106/22 196/1 scope [17] 37/8 51/3 51/11 51/22 51/24 52/14 52/17 59/13 65/24 79/8 86/9 110/3 112/2 157/22 202/10 202/21 202/23 score [1] 73/3 scrambling [1] 171/19 scrape [1] 95/11 screen [4] 47/22 166/8 166/14 173/25 scroll [23] 17/1 20/18 34/1 40/16 40/17 40/20 40/20 85/13 91/20 92/3 92/20 104/2 104/3 106/16 112/14 123/23 126/2 132/6 151/19 160/18 160/18 166/11 190/7 scrolling [4] 19/8 40/19 48/18 160/23 scrutinise [1] 28/13 scrutiny [1] 28/16 se [1] 63/8 seal [2] 130/18 131/4 sealed [2] 73/3 180/11 seals [1] 131/3 search [2] 68/19 146/11 searches [1] 161/22 searching [2] 96/21</p>	<p>161/10 seat [1] 99/7 second [32] 5/22 6/23 9/9 32/13 43/6 43/18 43/21 44/10 44/14 54/5 57/22 59/3 61/13 62/14 74/14 74/19 90/20 97/6 104/11 108/15 111/8 113/8 122/17 135/21 152/6 160/19 165/25 196/6 196/11 204/19 205/21 208/20 secondly [3] 39/20 174/8 186/20 Secretary [5] 6/5 6/25 22/20 100/22 166/3 section [1] 66/16 sector [2] 4/16 44/19 secure [3] 29/7 166/5 168/14 secured [2] 19/10 31/12 security [2] 4/15 26/6 see [106] 1/3 2/2 6/5 9/5 9/9 17/13 17/17 21/16 22/3 22/4 23/1 34/24 35/1 35/9 36/22 44/14 47/12 47/13 48/11 48/22 49/6 49/19 50/1 50/10 50/21 53/16 58/7 59/9 59/11 61/1 61/17 71/1 73/5 75/20 82/3 91/1 93/3 93/12 93/19 93/19 95/25 97/17 100/13 101/22 103/18 104/22 112/14 114/8 115/25 119/21 120/2 120/6 120/14 121/7 123/6 131/19 132/11 133/12 136/2 140/18 143/12 147/2 148/20 153/25 154/5 157/7 160/14 160/16 161/2 161/12 164/12 166/9 166/12 172/9 172/14 173/19 173/20 174/22 174/24 178/1 180/12 181/7 182/11 183/6 183/11 183/17 185/10 188/10 189/22 189/25 190/3 190/5 191/22 192/21 193/7 195/20 196/10 196/13 196/14 197/3 197/19 197/20 200/19 201/16 202/20 206/18 seeing [4] 7/1 40/18 44/15 195/15 seek [7] 6/24 35/23 63/16 73/17 117/17 149/4 159/4</p>	<p>seeking [1] 44/9 seem [5] 51/9 74/4 141/10 169/9 182/3 Seema [3] 62/6 164/23 182/7 seeded [14] 23/20 41/10 41/25 46/16 47/24 49/13 50/4 74/5 110/17 121/12 129/9 168/19 204/12 208/19 seemingly [3] 94/3 106/14 121/18 seems [10] 36/10 36/14 38/18 69/16 69/23 92/22 93/14 162/4 198/24 205/15 seen [18] 36/13 47/15 57/16 60/8 62/24 79/11 101/25 145/5 165/11 176/18 178/25 197/13 202/22 203/15 204/13 206/1 207/20 208/11 sees [2] 141/18 183/16 select [4] 100/24 120/12 122/19 136/6 selection [1] 115/2 self [2] 165/5 179/12 self-consciously [1] 179/12 self-reliant [1] 165/5 sell [1] 5/10 Seller [1] 61/14 selling [1] 26/3 semantic [1] 111/11 semantics [1] 111/17 send [4] 20/19 20/25 44/3 125/11 senior [13] 9/2 19/16 48/1 53/5 79/3 94/8 127/15 134/1 138/6 150/5 156/10 156/14 190/20 sense [11] 49/16 53/2 67/14 68/10 113/20 118/5 135/1 145/10 156/6 166/22 171/9 senseless [1] 137/5 sensible [5] 24/24 67/7 74/4 74/5 111/23 sensitive [2] 8/7 8/14 sent [9] 5/24 20/15 22/19 42/21 109/14 125/22 146/2 170/21 176/19 sentence [8] 63/5 64/15 80/9 86/25 101/14 110/11 116/25 123/16 sentences [3] 109/3 123/10 128/20 separate [3] 138/21</p>	<p>142/8 170/19 September [8] 3/2 27/19 34/22 49/7 49/24 54/1 55/2 94/4 series [8] 9/24 13/3 13/10 13/12 26/20 47/4 69/11 86/4 serious [16] 18/18 19/13 61/24 64/22 148/6 153/25 163/1 176/4 189/19 190/11 190/25 191/16 206/9 206/20 206/22 209/1 seriously [4] 18/7 28/6 32/4 152/14 seriousness [2] 63/4 63/6 servant [1] 38/16 servants [6] 77/21 84/23 87/21 89/11 110/15 135/15 served [1] 206/2 Service [1] 4/1 Services [3] 34/6 34/8 157/15 serving [1] 177/3 set [29] 4/20 18/12 19/3 21/5 37/11 38/17 50/19 51/17 51/21 52/1 60/7 61/11 61/12 70/23 87/17 107/10 107/13 110/1 112/3 132/8 139/22 168/22 179/10 179/21 180/21 189/4 189/9 196/1 204/8 sets [2] 106/24 161/22 setting [6] 23/15 50/6 143/10 146/15 187/15 196/12 settings [1] 46/17 settle [2] 52/13 164/14 settlement [10] 97/21 98/21 98/23 99/3 181/7 181/11 184/15 184/22 184/25 186/16 seven [3] 3/2 3/16 63/5 seventh [1] 97/7 share [4] 83/17 90/14 112/21 116/10 shared [13] 76/22 77/1 77/25 81/4 82/24 83/1 94/21 94/25 101/7 102/9 106/23 116/8 208/7 shareholder [12] 6/2 9/5 9/18 13/5 13/22 28/20 154/3 155/25 173/18 184/11 186/5 209/16</p>
--	---	---	--	---

<p>S</p> <p>shareholders [2] 11/9 102/14</p> <p>shareholders' [1] 12/4</p> <p>sharing [5] 81/8 82/11 82/15 84/14 117/16</p> <p>she [43] 6/16 6/17 6/20 6/21 10/8 10/15 10/17 11/5 11/13 12/19 12/21 14/3 15/21 16/10 20/13 20/15 41/9 41/10 41/10 43/11 43/13 67/19 79/15 79/17 79/20 83/12 83/23 84/5 92/13 93/8 107/8 115/12 116/22 117/5 119/22 125/5 125/22 139/10 147/15 153/3 153/6 206/3 206/6</p> <p>sheet [1] 64/18</p> <p>ShEx [3] 6/2 10/24 90/2</p> <p>shift [4] 49/6 50/2 170/11 173/6</p> <p>shifted [1] 130/6</p> <p>short [5] 9/17 53/14 90/24 114/6 164/10</p> <p>shortfalls [2] 165/3 165/14</p> <p>shorthand [3] 16/6 31/4 169/23</p> <p>shots [2] 182/7 182/21</p> <p>should [94] 1/9 1/23 2/6 9/24 14/16 20/14 37/11 37/15 37/24 38/2 41/2 41/3 41/12 42/11 42/25 43/1 43/9 43/11 43/13 51/4 51/5 51/6 51/11 51/13 54/20 60/5 62/20 63/24 69/14 71/21 73/21 73/23 73/24 75/12 76/22 77/1 77/20 79/18 81/19 84/17 86/3 94/20 94/24 97/15 98/22 98/24 99/16 99/16 99/20 101/12 101/24 101/25 102/8 104/25 112/21 114/14 117/19 120/19 122/6 124/24 125/1 125/3 126/9 126/11 126/14 129/10 131/21 132/11 132/20 133/6 134/1 134/5 135/23 138/7 139/18 150/2 150/17 152/16 154/24 156/11 158/6 158/12 158/18 167/10</p>	<p>168/21 171/4 177/24 180/22 197/1 197/9 198/10 203/11 204/3 206/3</p> <p>shoulder [1] 176/23</p> <p>shouldn't [3] 58/23 83/17 147/2</p> <p>show [2] 40/18 90/11</p> <p>shown [4] 10/15 121/8 159/12 208/12</p> <p>shutting [1] 134/10</p> <p>sic [2] 97/22 135/19</p> <p>SID [2] 94/10 94/11</p> <p>side [9] 9/10 9/24 10/2 10/9 21/16 155/3 168/24 179/3 181/7</p> <p>sides [1] 141/12</p> <p>Sight [15] 32/14 43/6 43/18 43/21 44/10 44/14 54/5 57/22 59/4 61/13 62/14 74/14 74/19 196/6 196/11</p> <p>sign [1] 126/18</p> <p>sign-off [1] 126/18</p> <p>signature [2] 2/14 70/11</p> <p>signatures [1] 69/20</p> <p>signed [2] 110/21 172/2</p> <p>significance [1] 101/20</p> <p>significant [27] 4/19 4/24 5/4 5/8 8/8 8/15 13/18 14/20 15/20 21/8 74/20 76/6 76/14 94/18 94/23 95/10 97/4 102/21 108/24 126/23 139/17 144/19 147/9 148/23 154/6 154/6 166/21</p> <p>silk [6] 2/6 2/11 128/16 138/16 150/5 204/2</p> <p>similar [4] 62/5 84/17 123/1 175/23</p> <p>similarly [1] 74/17</p> <p>Simon [3] 6/18 157/8 159/7</p> <p>simple [2] 105/5 193/6</p> <p>simply [11] 13/8 69/23 83/20 132/23 151/16 153/24 171/15 173/14 174/21 176/23 206/18</p> <p>since [7] 18/3 73/7 136/13 137/4 192/4 192/18 200/18</p> <p>sir [30] 1/3 1/9 43/7 44/10 44/15 53/8 53/11 53/16 53/18 88/14 90/20 91/1 99/19 113/25 114/3 114/8 154/13 164/6</p>	<p>164/8 164/12 164/17 165/1 175/3 180/16 184/1 200/15 210/8 210/11 210/19 210/21</p> <p>Sir Alan [2] 99/19 180/16</p> <p>Sir Anthony [4] 43/7 44/10 44/15 165/1</p> <p>Sir Wyn [2] 88/14 154/13</p> <p>sit [4] 1/12 14/14 153/13 174/21</p> <p>sites [1] 4/13</p> <p>sitting [1] 200/19</p> <p>situation [15] 7/15 7/19 33/3 50/14 67/19 116/7 127/14 169/16 172/1 174/24 180/22 181/11 181/16 183/2 200/2</p> <p>six [4] 18/2 163/16 192/2 192/16</p> <p>sized [1] 4/10</p> <p>skills [2] 9/4 39/8</p> <p>skip [1] 85/11</p> <p>skipping [4] 52/5 64/15 68/15 113/3</p> <p>slap [1] 104/21</p> <p>slide [1] 10/1</p> <p>slight [3] 57/24 98/8 105/25</p> <p>slightest [1] 30/1</p> <p>slightly [14] 24/13 26/10 29/17 36/21 57/19 81/9 130/6 151/5 151/11 151/21 173/8 175/10 180/14 189/8</p> <p>small [10] 17/16 18/8 18/25 22/24 25/7 120/8 120/22 122/11 136/6 171/19</p> <p>Smith [1] 107/24</p> <p>so [258]</p> <p>social [1] 43/21</p> <p>software [2] 110/1 179/25</p> <p>sole [4] 28/20 38/3 154/3 174/3</p> <p>solicitor [2] 34/6 38/13</p> <p>solicitors [2] 129/17 157/9</p> <p>solution [1] 200/8</p> <p>some [102] 4/18 5/21 6/19 7/2 8/18 8/20 11/7 12/1 12/16 12/25 17/7 17/22 18/19 19/10 20/8 20/13 21/18 22/1 22/14 26/1 28/3 28/15 32/25 33/17 38/19 39/3 43/24 44/22 45/17 46/14 46/25 55/13</p>	<p>57/14 59/12 60/15 67/13 68/8 69/10 71/12 71/18 74/21 76/4 76/9 76/13 80/24 91/4 94/6 96/1 97/5 103/9 111/23 113/1 115/4 117/10 124/12 127/8 127/24 128/8 129/6 129/15 130/18 130/22 131/20 131/22 131/24 131/24 137/15 137/25 138/14 141/14 142/23 143/22 143/24 146/12 147/6 148/22 148/24 150/11 151/2 151/3 153/17 162/23 164/5 164/24 167/25 168/18 170/20 173/1 175/5 175/5 177/20 178/6 178/19 179/12 179/15 179/17 186/24 187/15 187/15 199/5 202/9 202/19</p> <p>somebody [18] 17/17 33/13 33/14 33/22 37/4 39/5 39/7 46/8 46/25 58/9 98/2 98/12 182/21 193/10 193/12 196/21 197/11 205/6</p> <p>somebody's [1] 31/24</p> <p>somehow [9] 5/13 40/1 77/6 106/1 128/7 128/8 163/19 178/20 183/1</p> <p>someone [7] 12/15 46/24 89/8 99/6 146/6 146/7 187/1</p> <p>something [51] 5/25 12/6 25/22 25/25 31/9 31/23 44/6 44/24 45/1 45/7 58/7 62/5 64/9 69/1 70/11 71/8 71/20 81/15 81/16 83/6 87/8 97/1 97/5 99/17 103/22 116/11 122/13 122/16 123/3 124/15 131/8 133/25 142/22 144/8 151/12 152/12 154/10 154/22 155/9 155/18 162/14 162/21 163/3 184/23 191/23 193/3 193/10 194/5 194/13 199/15 199/23</p> <p>sometime [2] 33/4 184/21</p> <p>sometimes [8] 76/18 95/19 104/24 123/13 151/10 170/10 179/19 179/19</p> <p>somewhat [8] 82/6 118/23 134/8 134/13 141/10 142/13 169/10 181/5</p>	<p>somewhere [2] 143/15 146/21</p> <p>soon [3] 16/15 86/7 112/22</p> <p>sophisticated [1] 88/22</p> <p>sorrow [1] 171/12</p> <p>sorry [21] 4/19 11/23 13/7 18/8 40/19 40/22 49/11 51/16 56/4 80/9 99/5 143/17 171/2 171/5 171/10 171/17 183/13 198/13 207/12 207/22 210/6</p> <p>sort [55] 4/10 12/23 23/20 24/2 24/16 25/6 25/16 25/18 26/9 29/21 29/22 30/23 31/10 32/25 33/2 33/23 33/25 36/11 41/9 44/19 46/19 46/21 47/1 50/6 50/12 50/15 50/21 60/11 60/12 65/16 80/8 81/5 84/25 87/11 107/12 111/12 116/24 123/7 133/5 137/1 142/11 143/7 163/10 169/12 169/14 171/19 171/20 177/17 181/20 182/18 182/23 189/9 197/18 198/1 199/20</p> <p>sorts [3] 154/4 154/6 173/9</p> <p>sought [6] 66/17 69/25 147/17 147/22 147/25 209/7</p> <p>sound [2] 23/14 54/15</p> <p>sounding [1] 104/4</p> <p>sounds [3] 23/25 171/14 199/12</p> <p>source [5] 60/4 60/20 78/23 182/10 185/23</p> <p>sources [3] 54/2 69/6 155/6</p> <p>space [1] 163/16</p> <p>Sparrow [14] 14/4 14/10 14/25 15/2 15/21 16/7 17/3 20/17 21/4 30/9 43/4 106/17 193/24 197/19</p> <p>speak [9] 14/3 43/5 43/17 88/8 91/9 133/16 172/23 172/23 173/15</p> <p>speaking [15] 14/8 25/6 25/22 25/23 34/22 35/1 35/3 43/19 73/5 100/11 106/13 106/14 108/12 162/15 183/7</p> <p>special [1] 160/15</p> <p>specialising [1] 34/8</p>
--	---	--	---	--

S	starts [4] 170/12 181/24 190/10 195/19	23/17 24/13	165/18 166/2 166/20 166/22 172/4 172/7 184/6 188/24 200/7 200/17	suitability [1] 9/13
specialist [6] 73/17 128/2 128/3 128/3 128/5 128/5	state [7] 6/5 37/15 41/3 41/13 89/18 153/4 166/3	straight [2] 116/12 197/9	subpostmasters' [1] 168/13	suitable [4] 6/18 48/1 122/1 122/1
specialists [4] 83/5 128/1 130/4 209/20	State's [1] 6/25	straightforward [2] 121/15 122/15	subsequent [5] 50/14 52/5 146/7 152/10 170/21	suitably [4] 72/11 72/18 72/24 82/25
specific [18] 30/7 32/8 46/1 63/7 68/11 68/14 68/23 74/13 75/6 75/12 96/9 118/9 118/16 119/15 173/19 175/5 206/15 207/2	stated [2] 35/18 37/25	strands [2] 45/14 111/4	subsequently [5] 82/21 103/11 103/19 143/13 187/1	summarise [1] 57/16
specifically [3] 16/24 34/18 87/15	statement [30] 1/21 2/17 2/21 11/11 30/2 47/21 48/6 54/9 78/20 79/15 83/22 110/24 138/23 138/25 158/6 171/2 185/14 198/19 198/20 198/23 201/4 201/6 201/9 201/25 202/2 202/5 202/14 206/1 206/2 210/13	strategic [2] 10/10 10/11	substantially [2] 97/10 169/5	summarised [5] 85/10 88/9 93/4 146/8 160/1
specified [1] 121/23	statements [3] 30/15 139/18 182/12	strategy [6] 10/5 143/11 144/15 144/21 146/15 147/3	substantive [1] 117/24	summarising [1] 148/19
speed [2] 15/25 54/13	states [1] 148/21	strengths [1] 175/11	subsurface [1] 122/18	summary [14] 43/3 59/18 61/11 75/20 79/9 112/7 113/21 124/24 128/14 128/20 130/3 151/23 151/25 152/4
spend [2] 180/16 198/1	statistical [1] 168/5	strenuous [1] 163/25	subtly [1] 50/2	sums [1] 74/20
spending [2] 106/2 197/21	statistically [2] 24/24 166/21	stress [1] 110/6	success [1] 5/10	Sunday [1] 91/13
spent [4] 105/19 106/5 127/24 198/10	statistics [2] 151/3 151/4	stretched [1] 18/19	successful [4] 28/22 149/11 168/15 169/8	support [11] 6/21 17/24 18/18 19/10 19/24 23/6 59/16 117/14 180/17 186/9 205/22
spirit [3] 24/3 29/20 161/12	status [2] 120/16 158/21	strictly [1] 101/12	such [15] 28/25 43/23 50/13 66/25 67/2 67/5 74/18 80/1 86/18 103/2 120/1 131/24 146/17 173/6 178/8	supported [1] 111/24
SPMs [1] 165/2	stayed [1] 55/8	strike [2] 105/21 141/2	sudden [1] 25/19	suppose [14] 39/15 41/6 44/17 45/9 71/4 71/9 71/19 79/25 87/11 147/5 160/11 164/2 195/4 197/13
spoke [4] 6/11 6/16 14/9 125/22	stealing [1] 165/6	strikeout [4] 139/7 139/16 139/22 142/9	suffer [1] 67/13	Supreme [1] 147/23
spoken [3] 94/12 146/7 207/5	steering [4] 6/22 129/21 129/24 144/2	strikes [1] 88/15	suffering [1] 5/1	sure [45] 1/13 6/3 15/1 27/1 27/11 28/21 38/21 38/22 41/9 58/16 70/16 73/15 78/8 79/19 81/18 90/10 93/4 95/3 97/2 100/15 109/1 111/25 115/1 124/22 125/22 125/22 128/10 136/22 137/2 143/23 144/7 147/6 163/6 163/13 169/1 175/22 185/14 191/20 193/4 194/6 194/15 195/18 200/19 208/7 210/4
spot [2] 21/1 194/11	Stein [5] 164/18 184/4 184/5 198/17 211/8	strive [2] 181/6 181/7	suffice [1] 159/16	surely [1] 174/15
sprinkle [1] 130/22	step [1] 122/25	strong [20] 6/20 65/1 65/2 96/2 96/5 96/18 104/10 126/10 127/16 128/18 133/24 133/25 134/1 135/22 136/24 138/7 138/17 142/19 148/25 155/8	sufficiency [4] 61/19 63/15 64/6 64/13	surprised [2] 25/15 27/6
staff [4] 10/8 198/9 207/19 208/17	stepped [2] 3/11 147/22	struck [3] 12/6 159/12 203/12	sufficient [7] 62/10 63/19 66/24 67/4 198/12 205/20 205/22	surrounded [1] 179/9
stage [7] 15/1 15/6 57/20 96/3 116/11 143/22 176/3	steps [4] 29/4 101/24 112/16 150/8	structure [4] 5/11 59/11 59/12 172/13	sufficiently [2] 88/22 117/17	surrounding [1] 28/2
stage' [1] 149/5	stick [1] 89/16	structured [2] 67/16 76/2	suggest [14] 23/9 68/22 69/6 89/21 91/22 98/12 111/13 146/1 154/16 169/24 173/20 176/2 178/24 199/7	suspect [6] 27/24 105/25 111/15 122/22 142/14 193/6
stain [1] 64/19	sticks [1] 16/17	stuck [1] 14/11	suggesting [2] 63/25 176/22	suspense [4] 74/16 75/3 118/6 118/8
stake [1] 173/16	stifle [1] 132/3	study [1] 174/3	suggestion [9] 57/23 62/15 69/7 106/3 121/16 150/17 183/5 183/11 206/3	suspicion [1] 151/6
stakeholders [1] 102/15	still [12] 4/23 55/14 55/15 56/10 58/15 99/25 134/11 160/18 172/19 173/2 174/15 202/24	stuff [7] 104/20 134/16 153/18 159/21 176/1 176/1 197/3	suggests [6] 70/11 141/20 143/4 145/18 149/2 183/18	sustainable [2] 8/21 28/22
stand [2] 7/22 171/2	stone [1] 168/16	subcommittee [11] 144/6 144/16 144/20 144/23 144/25 146/15 146/18 146/22 146/24 152/22 153/15	Swannell [2] 184/10 184/19	swift [103] 30/10
standalone [1] 186/8	stonewalling [1] 177/4	subcontracted [1] 39/3		
standard [7] 112/24 136/14 136/20 139/23 192/6 195/10 195/15	stop [8] 64/25 89/1 112/16 129/23 134/5 155/1 183/25 203/23	subject [11] 39/8 59/21 74/13 87/10 92/4 104/5 110/9 126/13 133/17 168/8 170/25		
standards [3] 37/21 107/2 112/19	stopped [7] 65/21 69/14 93/24 133/6 138/16 169/1 169/8	submission [1] 173/22		
standing [1] 20/23	stopping [8] 35/22 70/13 77/9 120/22 124/9 155/11 155/20 192/21	subpostmaster [6] 61/25 64/20 66/18 67/17 70/7 145/13		
standpoint [1] 172/15	stops [1] 170/5	subpostmasters [25] 26/14 26/16 48/25 59/14 59/17 60/1 64/17 98/1 99/11 109/25 113/5 117/8 124/11 129/3 157/11		
start [9] 2/25 20/15 33/16 147/12 164/17 164/24 165/20 181/22 201/3	store [1] 73/21			
started [8] 68/10 73/8 97/16 97/16 105/1 105/6 121/1 142/13	story [4] 20/3 23/12			
starter [2] 13/1 35/1				
starting [2] 52/23 91/10				

S	systems [1] 49/2	180/16	1/21 2/13 2/20 4/6	165/5 165/6 168/14
swift... [102] 30/12	T	teams [2] 125/3	5/16 21/17 22/22 45/3	182/12 200/18
41/23 42/17 45/5	table [2] 107/8 165/4	169/13	50/22 53/7 53/11	them [35] 13/15
45/16 46/15 47/18	tack [5] 141/21 143/4	tear [1] 98/2	53/12 53/17 53/18	17/22 37/5 38/17
48/1 51/18 52/2 52/19	143/15 145/18 146/1	technical [4] 45/8	54/17 90/19 91/2 91/3	43/11 43/15 54/6 73/7
53/20 55/4 55/5 55/23	tackle [2] 7/23 37/5	45/12 67/24 151/18	94/2 103/3 104/8	73/19 74/8 89/8 112/9
57/2 57/17 57/21 58/1	tail [2] 170/12 170/13	telephone [1] 54/10	106/17 109/13 112/16	112/11 114/12 115/9
58/25 60/21 65/17	tainted [1] 40/2	tell [34] 1/18 4/6 20/2	113/24 114/3 114/4	116/1 119/23 120/23
65/21 65/22 66/4	take [53] 12/9 12/15	30/22 33/2 33/9 56/25	114/10 116/18 123/23	121/22 121/25 122/16
71/10 71/25 75/23	14/13 18/22 29/4 32/4	58/22 65/14 73/11	129/12 138/19 147/11	128/7 129/16 130/18
76/3 77/4 80/11 85/1	36/3 39/20 47/15	78/9 81/18 83/8 90/9	151/20 156/18 157/5	133/21 137/20 148/22
85/8 86/22 93/3 97/5	50/12 53/8 57/10	109/3 122/5 124/19	161/9 164/3 164/8	160/9 171/9 173/9
97/12 97/22 97/24	57/18 57/21 59/1 65/5	124/22 135/12 143/20	164/13 164/20 184/1	177/25 179/21 195/17
100/20 101/2 101/7	68/9 70/23 71/5 81/2	159/15 163/6 163/6	184/2 184/3 195/21	197/13 199/17
101/21 104/17 106/13	85/11 90/20 94/14	163/13 163/14 163/24	200/9 200/10 200/15	thematic [1] 55/24
106/21 107/7 108/13	96/2 96/8 96/12 96/15	167/12 177/23 178/19	205/8 210/7 210/8	themselves [4] 39/12
108/20 109/23 110/21	107/1 112/1 113/1	195/13 196/16 202/25	210/9 210/12 210/16	47/16 59/15 82/16
111/20 111/22 111/25	116/1 119/12 122/10	206/21 209/12	210/20 210/21	then [98] 3/11 6/4
113/23 114/12 117/17	123/16 124/4 125/15	telling [3] 125/5	Thanks [1] 141/9	6/23 7/9 8/3 8/24 10/9
118/14 119/8 119/14	128/25 141/11 151/9	153/12 187/5	that [1162]	14/7 14/11 16/2 17/17
119/22 120/11 120/25	156/4 163/15 164/6	temptations [1] 26/6	that I [3] 11/2 90/13	19/8 20/18 21/14
124/3 124/17 125/6	166/17 168/5 168/12	ten [2] 13/1 35/1	193/23	21/23 22/10 22/14
126/23 127/20 128/21	169/7 169/21 177/20	tenable [1] 205/25	that's [89] 3/6 3/20	23/1 23/10 26/25 29/9
130/9 130/19 131/14	182/7 192/8 201/23	tens [2] 25/4 26/21	4/2 5/23 11/11 14/9	31/23 37/10 37/22
132/4 132/23 133/20	205/4 205/8	tense [1] 195/23	16/6 16/17 20/16	38/17 41/15 44/5
138/15 138/20 159/12	takeaways [1]	tenure [3] 96/4 96/17	25/25 26/18 27/8	48/18 52/16 54/11
162/18 166/25 194/9	108/20	175/6	27/24 31/9 32/7 34/11	60/8 61/1 61/16 66/15
195/8 196/12 196/22	taken [37] 18/6 35/13	term [4] 3/15 112/3	36/7 36/21 39/14	67/11 68/22 71/13
197/8 197/17 198/20	36/20 36/24 40/8 45/6	191/24 200/8	42/17 44/21 44/23	71/19 71/25 75/20
198/21 198/23 199/9	57/3 59/25 61/9 63/18	terminated [2] 24/25	47/5 57/19 65/1 65/6	80/25 81/4 92/20 98/6
199/16 199/18 200/24	83/5 93/25 96/16	165/13	71/8 72/6 76/12 77/2	99/23 100/21 102/16
201/2 203/6 204/2	96/17 99/2 99/4 100/5	termination [1] 169/3	78/8 79/15 79/22 80/5	103/3 104/3 105/11
207/15 207/21 208/5	102/2 114/14 114/19	terms [32] 4/6 5/11	81/5 84/4 92/13 92/15	107/24 109/12 112/3
208/9 208/11 208/15	114/22 114/24 115/7	11/11 11/21 12/24	92/18 92/19 95/22	112/6 112/6 113/3
Swift's [3] 66/9 130/5	115/10 115/17 115/24	37/5 49/20 50/20	96/1 104/2 107/9	115/21 117/20 118/2
133/11	116/5 116/5 116/10	50/20 52/4 52/7 55/22	107/17 108/4 109/20	119/15 120/6 126/19
swiftly [1] 47/9	119/21 119/23 121/19	60/8 60/13 61/1 76/1	111/1 111/11 113/19	130/16 132/8 133/16
Swinson [1] 10/7	122/11 156/12 172/8	90/17 95/23 108/15	117/4 119/5 119/5	134/6 135/7 135/14
sympathy [1] 96/1	194/1 198/16	108/16 127/20 136/10	123/1 123/18 124/21	136/1 141/8 145/2
system [59] 13/19	takes [3] 15/14 19/1	136/18 137/5 138/17	125/5 125/7 130/16	145/7 146/14 149/3
17/19 18/1 23/2 23/7	28/6	146/21 155/21 172/13	131/8 132/9 134/19	149/15 150/11 152/4
23/23 23/25 27/23	taking [7] 27/21	180/24 187/23 188/23	136/2 137/22 142/14	157/4 159/23 159/24
28/2 28/8 28/14 31/1	29/18 82/2 108/23	198/25	143/16 152/8 156/17	160/18 160/23 161/20
31/6 32/2 32/3 37/18	118/23 173/21 182/21	terrible [2] 50/13	161/2 162/10 164/1	164/19 178/10 181/24
42/4 42/11 59/15	talk [6] 82/8 176/8	160/7	170/8 171/25 174/24	189/5 189/19 190/17
59/16 67/12 69/9	176/10 190/17 197/4	test [2] 8/11 148/13	177/13 178/23 182/5	191/22 195/9 195/25
69/22 72/15 72/21	197/4	tested [2] 83/6	185/5 187/5 187/19	196/20 196/22 199/4
72/22 73/4 73/6 98/3	talked [4] 50/19	132/18	189/13 189/23 191/19	199/14 200/25 206/2
98/10 98/15 108/10	119/22 178/24 180/1	testing [5] 112/25	193/3 200/12 200/25	theoretical [3] 71/1
110/1 113/1 117/21	talking [8] 11/1 33/1	117/23 118/11 136/14	205/12 206/9 208/10	71/22 149/23
157/15 167/17 181/16	36/2 75/25 93/20	136/20	theft [21] 19/1 61/19	theoretically [2] 72/1
181/21 188/15 188/19	132/7 191/13 205/9	tests [1] 19/4	61/23 62/2 62/2 62/7	72/5
189/6 189/10 189/16	task [4] 37/12 39/4	text [4] 17/14 74/6	62/11 62/19 62/23	theory [2] 70/24
189/16 191/4 191/7	45/21 47/25	110/12 152/4	62/25 63/3 66/3 66/19	195/3
192/2 192/9 192/12	tasks [1] 112/20	than [27] 2/9 11/21	66/22 66/24 67/5	there [176] 1/10 1/24
192/13 192/16 195/16	taxpayers [1] 4/23	23/16 25/10 26/13	166/16 205/13 205/23	3/5 8/10 8/18 8/19
197/9 197/12 198/25	team [22] 7/23 9/12	33/7 44/17 45/7 45/19	205/25 206/4	9/15 10/3 11/16 11/21
199/10 199/10 200/6	34/18 35/16 48/3 48/8	47/4 47/22 55/7 55/15	their [25] 18/10 23/3	12/25 13/13 13/18
systemic [11] 30/14	50/24 81/2 120/8	57/17 58/11 61/24	56/16 63/24 64/13	19/2 19/9 21/16 24/14
30/20 30/25 30/25	120/22 121/3 121/17	63/8 83/16 93/15	67/21 72/23 74/14	25/4 25/5 25/8 26/6
31/4 31/13 31/25	122/11 122/19 123/1	108/22 115/23 125/20	75/15 106/23 113/6	26/6 28/8 28/15 29/11
108/6 108/13 108/14	132/13 136/6 163/25	137/11 171/9 179/16	117/13 122/1 130/5	30/12 30/13 30/18
108/21	172/17 172/24 173/13	186/22 198/3	140/12 140/15 158/14	30/19 31/7 31/13
		thank [58] 1/4 1/14	158/20 165/4 165/5	31/25 32/8 32/22

T	113/17 115/18 122/17 138/24 143/10 153/10 161/15 165/6 177/2 180/9 185/24 186/12 187/6	110/18 111/13 122/17 123/8 129/11 134/11 134/18 135/12 137/15 146/24 150/25 155/5 156/9 156/13 163/4 167/15 167/24 169/8 169/17 169/18 170/14 178/16 178/21 179/24 180/7 197/14 203/19 204/19 208/25	115/9 128/11 128/14 138/9 138/12 155/17 184/21 185/7 197/16 201/13 thousands [2] 25/4 26/21 threatened [2] 124/10 129/18 threatening [1] 188/20 three [13] 6/8 17/14 22/23 27/18 28/15 57/1 132/10 132/11 191/24 202/17 203/9 204/8 204/20 threshold [1] 139/22 through [28] 1/12 17/6 24/15 28/12 31/3 55/23 59/6 73/15 97/9 97/11 98/18 100/4 112/11 112/14 127/11 130/8 130/13 144/9 153/19 167/3 167/4 167/11 167/17 167/18 168/4 178/14 178/16 203/12 throughout [5] 18/17 72/20 73/3 121/24 175/6 throw [1] 40/7 Thursday [2] 126/20 136/3 tight [1] 81/22 tightly [1] 81/22 Tim [48] 1/5 6/17 7/1 14/1 15/20 15/21 15/23 17/13 34/23 35/2 35/5 37/9 37/11 37/14 37/15 37/24 38/2 38/8 42/23 54/12 78/23 85/7 91/24 92/6 94/14 94/18 95/8 100/23 106/22 108/6 120/14 130/7 130/19 132/11 132/15 132/16 132/25 133/11 133/12 134/10 134/10 136/10 136/10 145/4 161/10 164/3 176/20 191/25 Tim's [1] 177/24 time [149] 3/7 4/18 6/13 7/25 8/25 11/3 13/7 25/11 25/12 26/23 30/8 30/10 30/16 30/23 31/21 32/10 33/11 40/3 41/25 44/18 44/22 45/13 49/11 49/13 49/15 50/3 50/17 52/15 52/19 53/4 57/8 58/14 60/14 63/12 65/8 67/3 69/13 71/9 73/7 73/16 77/7 77/21 78/12 80/13 81/1 82/5	83/2 83/15 84/7 85/3 88/3 88/11 88/21 89/17 92/10 95/1 95/2 98/9 101/9 103/18 105/4 105/15 105/16 105/19 105/25 106/2 106/5 106/5 106/7 106/13 109/7 109/9 113/1 113/10 118/22 119/6 120/18 122/18 123/14 127/4 127/24 128/10 128/25 129/9 130/11 132/16 132/16 142/13 144/4 150/10 152/20 152/22 152/24 153/5 160/6 160/8 163/7 163/14 163/22 170/15 172/11 173/1 175/4 175/7 175/8 175/8 175/18 176/3 176/7 178/4 178/8 178/9 180/22 183/24 184/10 186/7 187/16 191/10 192/9 192/12 192/22 195/14 196/4 197/21 197/22 197/25 198/1 198/4 198/9 198/12 198/14 199/24 202/8 202/23 203/5 203/8 203/15 204/11 204/17 205/3 206/16 206/18 206/24 207/9 207/13 208/18 208/22 209/8 210/1 times [4] 57/1 145/11 189/13 209/13 timescale [1] 33/1 timetable [3] 118/24 132/15 149/9 timing [1] 196/3 TIMOTHY [3] 1/7 1/20 211/2 tinge [1] 180/15 tired [1] 171/7 today [20] 1/10 3/14 6/15 14/9 85/8 97/15 101/15 124/3 150/5 150/22 151/23 160/4 168/18 171/1 179/11 180/1 199/20 207/5 209/13 210/14 together [9] 52/7 57/9 59/1 75/19 75/21 148/18 164/22 170/2 178/17 told [31] 11/4 11/12 17/6 20/4 24/13 27/3 27/15 57/3 57/25 67/20 68/1 79/20 81/17 81/19 84/2 90/10 101/14 102/3 107/21 110/22 124/9 124/12 124/16 156/19 161/6 183/14 185/8
there... [142] 33/19 35/22 35/22 43/16 46/5 49/12 50/2 51/9 55/3 55/5 55/14 60/11 60/14 61/8 61/8 62/4 62/22 63/19 64/25 65/13 65/15 66/10 66/23 67/3 67/25 68/5 68/7 70/13 70/18 70/24 71/12 71/16 71/22 71/25 74/11 74/19 75/22 76/9 77/9 78/2 80/1 84/8 85/14 85/17 86/2 86/25 87/24 88/3 88/12 88/16 88/17 89/4 89/22 92/1 95/13 95/17 99/16 101/14 104/19 104/23 106/17 107/12 107/18 108/13 108/21 110/13 112/6 112/16 113/1 115/5 115/25 117/12 117/14 118/22 120/3 120/22 122/22 124/9 125/24 129/5 129/23 132/2 132/25 133/15 143/14 146/6 146/10 146/17 146/20 148/5 148/15 149/9 151/24 153/3 153/17 154/5 155/1 155/3 155/11 155/20 158/16 158/23 158/24 158/24 161/20 162/25 164/5 165/8 165/17 166/12 167/2 167/3 169/2 170/20 171/3 171/16 171/16 173/16 175/25 178/18 179/19 181/10 181/22 181/23 182/2 183/10 183/25 184/14 185/16 186/7 186/22 189/5 189/21 192/21 194/2 194/7 194/12 195/20 199/14 202/9 203/23 205/20 there's [25] 9/24 13/17 16/2 21/17 37/22 48/10 50/13 75/10 79/16 89/21 92/7 97/24 102/16 107/19 121/16 143/12 143/17 143/22 160/16 180/23 181/9 185/25 193/13 206/12 206/13 thereafter [1] 32/18 thereby [1] 158/13 therefore [28] 2/22 6/24 29/1 43/10 51/1 52/10 52/25 57/23 64/1 86/10 86/14 88/8 94/24 98/16 109/17	thereof [1] 75/4 these [70] 16/20 17/24 21/21 23/3 24/11 37/2 43/9 43/17 43/19 44/21 44/23 47/7 48/15 49/4 49/20 50/25 51/9 52/11 55/12 57/10 58/6 59/21 61/5 61/21 64/2 65/9 71/18 76/12 76/16 81/23 86/6 98/21 99/25 102/23 104/23 106/13 107/1 117/5 118/5 121/7 122/4 122/7 127/23 132/9 132/14 132/18 132/25 133/2 133/13 134/17 137/14 137/20 138/1 160/6 160/12 163/10 163/21 167/6 169/11 169/22 170/4 171/11 173/2 173/9 177/11 189/1 190/25 196/21 198/11 203/17 they [72] 2/19 17/21 18/8 21/14 25/8 35/7 36/6 36/24 38/3 39/12 41/21 43/22 47/2 47/13 56/1 56/2 57/12 58/22 61/12 61/13 63/11 63/11 63/25 64/22 67/7 67/15 68/3 69/1 69/6 74/4 74/5 81/23 84/1 93/3 93/9 93/12 93/13 108/20 108/24 109/10 109/11 112/18 116/5 117/24 121/21 121/22 122/6 123/19 123/20 128/22 128/23 132/20 135/4 138/15 142/20 142/21 142/22 151/17 154/5 165/6 165/22 169/2 169/25 173/14 175/9 177/4 179/2 182/11 182/23 183/6 207/18 208/6 they'd [1] 119/23 they're [12] 31/8 31/8 39/23 41/20 55/14 55/15 58/21 74/6 128/21 132/8 134/19 138/19 thing [47] 5/6 16/17 23/19 24/4 24/5 31/10 39/21 57/10 66/7 71/11 73/12 73/16 77/3 81/10 84/18 98/25 104/12 108/15	things [67] 7/21 7/24 12/12 15/22 16/5 21/6 25/9 25/10 26/12 31/2 36/3 36/12 39/15 41/21 46/24 49/12 50/3 50/16 53/3 57/7 65/9 78/6 83/2 84/21 87/9 89/19 100/3 100/4 104/23 105/19 108/1 119/25 121/4 121/10 121/14 123/13 127/23 128/9 135/5 135/5 142/10 150/22 151/11 152/18 153/25 154/7 159/12 160/2 160/6 162/19 163/10 163/20 163/21 164/1 169/2 169/6 169/23 175/21 187/18 189/8 193/12 194/7 195/4 199/25 202/11 202/12 208/21 think [263] think's [2] 95/10 142/8 thinking [1] 162/12 thinks [1] 183/23 third [7] 7/9 74/17 104/14 137/13 191/23 192/14 205/24 this [438] Thompson [3] 6/1 15/17 107/24 thorough [2] 17/25 23/5 thoroughness [1] 7/4 those [39] 28/11 29/14 30/5 32/5 36/9 52/6 57/7 61/13 62/24 67/1 67/14 67/17 72/16 73/5 75/5 83/2 87/17 100/17 109/3 113/7 118/16 118/18 119/16 135/5 136/18 137/8 139/2 140/2 144/11 158/5 158/19 164/6 172/2 173/8 178/3 179/8 195/12 199/5 201/10 though [3] 76/18 172/2 207/22 thought [17] 7/19 12/20 40/4 82/18 88/10 108/6 111/22		

T	translated [1] 66/5	turned [7] 5/12 7/21	40/22 43/5 52/8 85/22	120/8
told... [4] 203/5 204/6	trawl [2] 176/10	16/15 71/24 83/5	93/25 102/18 110/16	undivided [1] 53/4
208/22 208/22	182/11	166/25 187/23	112/2 112/16 122/5	undue [1] 206/6
Tolhurst [3] 152/1	Treasury [2] 48/2	Turning [1] 204/19	126/11 132/16 135/23	unease [4] 150/20
152/18 153/1	48/8	turnover [1] 4/9	155/13 155/21 156/4	151/15 154/16 154/20
Tom [12] 91/11 95/4	treated [1] 18/9	turns [3] 44/5 73/13	156/7 156/15 176/14	uneasy [1] 151/14
139/12 144/23 146/5	treatment [2] 88/6	81/11	191/25	unexplained [1]
147/5 147/14 152/1	145/13	twice [1] 138/5	underhand [1] 128/8	67/23
152/21 153/7 153/13	trial [16] 62/6 140/4	two [34] 6/15 15/9	underlined [2] 17/25	unfair [2] 96/8 181/2
182/24	140/5 140/16 141/5	22/11 31/23 32/14	23/7	unfair/disproportiona
tomorrow [1] 35/2	145/15 148/20 149/12	35/23 36/3 36/12	underlying [1] 47/17	te [1] 96/8
tone [2] 145/14	149/13 149/17 149/25	39/15 42/24 44/14	undermine [2] 66/19	unfairly [1] 18/9
145/18	152/23 154/2 159/18	56/14 61/6 73/5 74/14	183/1	unfairness [1] 149/3
Tony [5] 124/24	159/18 169/5	88/17 105/12 109/3	undermined [2]	unfairness' [1]
126/5 129/20 131/20	trials [7] 99/3 140/9	113/3 122/9 132/18	66/25 158/4	149/18
135/19	152/11 159/17 172/10	147/9 155/6 155/20	undermines [2]	unfolded [1] 65/19
too [9] 3/6 46/18	173/12 183/3	156/10 156/14 161/22	43/20 158/1	unfortunate [1] 83/4
61/23 99/4 156/9	Tribunal [1] 3/25	182/1 182/2 189/8	underneath [1] 9/10	unfortunately [3]
159/23 159/24 168/6	trick [1] 137/21	195/19 202/11 205/4	underpinning [1]	82/9 99/2 173/15
170/11	tricky [1] 150/1	208/13	129/6	uniquely [1] 208/13
took [27] 3/4 4/8 5/16	tried [13] 21/5 170/16	type [7] 44/19 56/13	underpins [1] 110/7	United [1] 147/24
6/8 12/8 58/3 58/5	172/12 172/17 175/16	69/1 123/8 138/10	underplays [1]	universally [1] 65/4
71/3 72/7 80/4 81/20	177/10 178/15 180/13	187/15 198/5	107/16	unjustifiably [1]
83/3 88/25 92/5	188/22 189/11 197/7	typed [1] 87/9	Undersecretary [1]	64/18
103/19 104/10 106/5	197/11 203/18	U	153/4	unknown [1] 132/20
111/14 127/4 127/16	trigger [2] 55/10 56/1	UK [1] 184/12	understand [42]	unless [7] 35/7 36/6
128/10 144/22 161/25	trimmed [2] 119/8	UKGI [6] 80/14 84/20	12/10 15/15 35/22	130/9 130/13 150/3
188/18 199/17 202/19	120/1	94/4 146/1 152/1	41/22 41/25 49/3	174/8 206/16
208/18	true [6] 2/17 93/9	184/12	61/22 62/4 71/1 73/7	unlikely [1] 72/3
tools [2] 183/8	96/23 119/5 138/13	UKGI00005361 [1]	81/7 82/10 82/14	unmatched [3] 74/16
183/16	191/18	13/9	82/14 87/4 87/15 90/7	74/20 75/2
top [9] 71/18 118/20	truly [2] 108/20	UKGI00006482 [1]	93/21 99/21 101/4	unnecessary [1]
120/6 126/19 131/22	123/11	107/22	101/9 105/21 106/6	137/6
163/9 173/11 191/25	trust [4] 3/18 191/14	UKGI00011785 [1]	111/17 112/24 118/11	unpleasant [2] 95/19
192/14	198/7 205/5	91/10	121/22 128/22 139/12	134/8
topic [6] 44/5 89/16	trusted [1] 179/9	UKGI00012703 [1]	152/15 155/11 155/12	unreasonable [2]
138/21 156/19 170/19	trustworthy [1] 39/23	94/2	177/7 177/9 177/22	49/14 174/25
186/15	truth [1] 179/15	UKGI00017966 [1]	180/13 187/18 193/1	unreliable [1] 98/4
topics [1] 139/5	try [10] 7/25 8/20	161/9	194/20 194/22 197/24	unremarkable [1]
totality [1] 24/6	46/14 71/1 163/20	UKGI00019313 [1]	199/7	198/24
totally [1] 167/15	163/25 170/6 178/22	100/16	understanding [13]	unreservedly [1]
touched [1] 184/15	182/11 206/25	UKGI00019884 [1]	37/12 70/12 78/1	174/6
touching [2] 127/9	trying [41] 7/23 26/18	5/22	80/13 81/25 82/13	unresolved [2] 29/11
129/4	29/20 30/23 46/2 50/2	UKGI00042677 [1]	83/11 84/12 93/1	29/14
tough [1] 180/7	83/19 100/13 113/22	9/1	93/22 115/16 116/9	unsafe [2] 23/9 174/5
toying [1] 171/1	140/20 142/1 151/10	ultimate [2] 99/3	154/20	unsatisfactory [8]
TP [4] 40/22 41/12	154/11 154/12 155/5	200/5	understood [13]	81/10 167/23 169/19
108/4 152/8	163/8 165/4 165/10	ultimately [10] 22/16	47/25 77/19 77/21	171/25 178/1 179/20
track [2] 17/6 66/11	166/23 167/5 167/9	29/23 37/3 45/4 97/8	77/22 78/10 78/15	180/15 200/5
traction [1] 62/16	167/16 168/25 170/9	97/19 176/4 185/25	80/25 87/7 108/14	unseat [1] 168/10
train [1] 99/22	171/15 172/1 172/5	186/19 205/11	111/17 115/8 125/9	unsuccessful [1]
transaction [9] 68/6	173/9 176/2 178/5	Um [2] 123/21 191/15	187/12	149/15
68/12 68/17 69/18	178/24 179/3 180/4	unable [2] 10/8 10/18	undertake [3] 45/21	until [18] 3/1 3/11
70/2 70/5 70/10 72/13	180/6 181/17 181/19	unaware [1] 93/9	112/18 131/14	3/13 4/1 15/14 25/22
74/22	182/23 183/13 185/20	uncertain [1] 86/10	undertaken [13]	43/11 44/10 90/21
transactions [10]	194/25 208/24	unclear [1] 37/11	35/15 35/20 51/24	113/25 121/23 156/5
18/2 23/24 24/1 25/3	Tuesday [7] 85/10	uncooperative [2]	60/6 68/18 79/10	156/25 160/11 167/7
67/24 70/3 72/20	147/16 147/20 184/20	141/12 142/5	109/22 110/3 118/4	172/18 181/13 210/23
73/20 192/3 192/17	210/17 210/20 210/24	uncorrected [1]	124/6 126/8 126/11	unusual [5] 29/17
transcript [2] 62/6	turn [15] 1/24 9/9	74/22	135/22	29/19 67/23 68/20
148/20	19/12 27/16 30/2 34/1	uncovered [1] 76/8	undertaking [5]	205/14
Transformation [1]	66/9 67/11 72/8 78/21	uncovering [1] 127/2	58/10 58/10 64/13	up [87] 1/24 5/12
10/14	114/11 138/21 145/2	under [22] 4/9 38/10	127/7 127/10	5/16 7/2 7/6 14/7 15/4
	200/23 201/5		Underwood [2] 34/13	15/16 15/25 16/15

U	used [16] 16/7 17/20 18/3 20/16 23/24 46/16 46/24 135/7 135/7 145/11 157/9 166/5 192/3 192/5 192/17 192/19	83/19 90/12 via [1] 20/15 victimisation [1] 174/6	140/11 143/7 wants [6] 28/21 35/8 36/6 37/15 41/3 41/13 Warmington [4] 54/4 54/8 55/19 57/6 wary [1] 23/15 was [575] wasn't [34] 7/20 15/5 16/1 26/22 33/20 65/7 65/13 76/4 88/21 97/17 102/1 108/2 108/13 109/5 115/25 116/8 119/18 126/24 127/5 129/25 131/19 131/25 132/1 135/10 135/10 136/21 137/24 162/25 175/25 178/9 181/15 199/18 203/13 208/20	27/19 welcome [1] 21/2 welcomed [1] 102/23 well [92] 7/14 11/8 12/10 12/20 23/22 24/19 25/12 26/2 36/14 40/12 41/23 42/10 44/21 45/16 50/15 50/20 52/20 53/5 57/13 62/13 64/24 65/16 75/17 77/21 79/9 84/4 87/6 93/11 95/23 102/21 103/1 103/8 122/3 122/7 125/16 125/25 127/24 131/7 134/15 141/16 141/17 144/4 144/23 145/10 147/5 152/20 153/24 159/8 160/2 162/14 165/22 165/24 166/7 166/8 167/8 167/16 168/1 168/17 169/6 171/6 173/19 174/14 175/1 175/14 176/11 176/12 176/15 178/3 181/20 181/25 182/21 183/14 184/23 185/8 185/18 188/10 191/3 191/13 191/20 191/22 192/14 193/10 196/19 203/11 203/18 204/10 207/18 208/7 208/14 208/24 210/12 210/20 well-qualified [1] 53/5 went [15] 16/14 21/25 25/19 25/20 42/17 55/3 55/7 55/23 70/13 116/11 121/25 125/5 127/1 135/14 202/10 were [218] were/are [1] 118/12 weren't [6] 131/13 135/9 144/2 172/8 175/22 178/3 Westminster [1] 69/24 what [215] what's [11] 51/16 97/20 121/9 128/22 151/21 175/16 177/20 181/25 183/13 188/4 207/22 whatever [22] 12/23 24/7 24/20 24/23 24/25 36/23 40/11 60/14 77/17 79/19 83/20 98/19 106/7 108/13 108/18 138/10 155/18 163/24 165/23 177/12 185/21 185/22 when [71] 4/8 5/12	
up... [77] 18/12 19/6 19/17 20/18 21/10 25/19 25/20 27/21 29/18 30/2 40/17 40/17 40/19 40/20 45/13 47/22 50/6 52/2 53/8 54/13 59/20 60/2 66/4 71/21 78/21 86/6 92/3 92/24 93/14 93/17 93/18 94/20 94/24 95/7 98/2 105/22 115/1 119/7 119/25 128/9 131/13 131/21 136/9 136/23 138/16 145/7 145/20 146/6 151/11 160/8 164/18 164/18 164/19 165/2 166/8 166/12 166/25 167/22 168/21 169/3 171/2 172/11 173/25 180/20 180/21 181/16 189/22 190/8 190/23 196/1 196/12 199/20 200/1 200/23 201/6 204/8 205/6 up' [1] 68/10 upcoming [2] 13/17 14/19 update [7] 44/3 94/8 109/21 110/6 116/20 116/22 145/17 updated [1] 108/4 updates [2] 86/13 86/15 uploaded [1] 2/21 upon [11] 9/21 32/17 33/10 74/1 122/11 155/19 158/7 158/10 174/16 179/9 205/19 upside [1] 172/13 urgently [3] 76/10 148/10 152/16 URN [1] 1/22 us [43] 1/3 1/18 1/22 4/6 19/21 46/13 53/16 53/24 54/21 54/22 60/4 63/22 64/2 65/14 68/1 68/3 69/16 91/1 91/19 101/14 102/9 114/8 126/20 130/17 130/21 131/5 131/18 131/20 145/11 145/12 151/3 154/12 154/13 155/17 156/19 164/12 170/7 182/25 184/18 194/1 194/14 196/3 198/24 use [12] 12/7 32/18 32/23 72/19 72/23 73/1 120/1 137/5 157/13 179/6 187/17 191/24	usual [3] 1/11 29/25 189/9 usually [5] 7/17 8/7 8/14 20/5 154/13 utter [1] 56/9	view [61] 4/6 10/23 11/13 12/3 12/4 12/8 12/8 14/25 15/9 15/14 23/11 23/18 24/19 39/2 39/23 41/2 44/11 44/24 46/1 47/20 59/2 60/11 61/18 64/7 65/18 68/9 69/7 76/25 77/24 81/5 82/5 89/20 96/5 97/15 98/14 98/25 100/11 107/10 113/7 114/13 117/17 119/23 124/3 127/25 128/2 128/24 132/9 132/9 133/5 134/11 137/22 137/23 151/11 153/21 153/22 154/4 156/6 172/3 172/9 173/21 175/10 viewed [1] 176/4 views [9] 6/25 11/8 12/11 12/23 13/14 30/9 63/24 69/11 147/25 virtually [3] 154/2 169/15 177/16 volume [2] 38/8 139/1	wasteful [1] 132/19 way [51] 20/16 24/21 32/25 41/16 42/13 42/14 49/10 52/1 65/6 66/10 69/15 82/24 83/7 83/13 98/3 98/19 100/1 100/1 103/22 107/12 121/19 126/22 127/12 132/2 134/12 137/20 138/5 138/18 147/5 150/14 150/20 151/2 151/2 151/6 155/14 164/25 165/5 165/8 167/1 171/17 171/17 177/1 180/19 186/14 188/13 197/16 197/20 199/3 201/18 205/19 208/10 we [358] we'd [3] 52/3 98/1 181/19 we'll [11] 16/21 47/13 48/11 57/10 59/9 70/25 71/10 88/1 97/17 98/18 166/8 we're [20] 1/11 11/1 17/6 36/2 45/20 49/18 57/8 80/16 91/9 92/1 93/6 100/4 123/25 127/13 129/4 136/11 139/9 189/21 199/9 204/14 we've [14] 24/18 24/22 24/24 60/8 67/9 98/7 98/8 98/9 100/18 126/4 178/25 181/20 193/23 203/21 weakened [1] 149/7 website [1] 2/22 Wednesday [1] 1/1 week [10] 47/10 91/18 105/2 105/7 106/24 124/2 125/12 139/13 147/21 184/19 weeks [2] 20/25	vaguely [1] 25/5 value [5] 11/7 119/22 122/24 123/2 128/11 van [1] 61/14 various [6] 37/3 43/5 52/6 125/3 141/3 143/14 varying [1] 5/10 vast [1] 18/4 vehicle [1] 146/14 Vennells [14] 9/13 9/25 11/3 11/14 13/23 29/9 42/21 44/9 93/4 103/17 106/15 145/24 146/8 187/13 Vennells' [1] 27/15 verbal [2] 86/1 88/1 version [3] 59/2 82/25 119/2 very [84] 1/4 2/13 2/20 2/20 4/13 4/18 5/11 6/19 7/15 7/20 8/6 8/13 8/18 12/8 14/20 15/6 18/7 18/8 18/18 18/25 20/12 21/2 21/7 24/8 27/9 29/19 31/8 38/23 41/20 42/6 46/15 50/14 53/5 53/11 53/18 56/11 56/24 72/2 77/2 81/22 96/2 97/21 99/1 104/10 106/4 114/3 114/10 120/10 123/21 127/14 127/16 127/22 128/16 128/18 134/20 138/19 138/22 139/1 139/22 148/22 151/6 153/25 156/10 156/10 156/14 156/18 162/13 163/1 164/3 164/8 168/9 170/18 171/11 176/13 176/17 177/25 179/20 191/10 191/12 195/21 198/11 209/1 210/14 210/20 vested [3] 83/19	W wag [1] 170/13 wagging [1] 170/13 wait [3] 60/8 156/5 164/14 waiting [1] 181/13 waive [2] 89/8 89/11 waived [1] 149/7 waiver [1] 89/22 waiving [1] 133/14 walked [1] 11/25 wall [4] 160/9 160/10 178/24 179/7 want [37] 13/14 20/25 40/11 40/13 46/8 52/2 65/16 66/8 84/2 94/6 96/22 120/20 120/24 129/15 136/5 152/12 154/10 154/22 156/9 164/24 168/8 169/14 181/1 181/3 186/25 197/3 197/4 200/22 200/23 200/24 201/3 201/23 202/11 204/22 205/2 205/4 205/7 wanted [10] 35/25 40/18 55/12 80/24 135/11 152/25 182/7 188/4 204/19 206/18 wanting [3] 60/10

W	163/5 165/20 166/12 178/11 185/16 185/24 194/19 195/1 195/2 203/1 203/2 203/23 204/16 209/1 209/6	white [1] 174/10 whitewash' [1] 35/20 who [79] 6/1 6/12 12/15 15/14 17/19 22/5 24/1 24/5 24/6 24/25 27/1 33/22 39/7 39/19 39/24 46/9 46/16 46/24 46/25 47/16 50/5 51/6 53/1 56/14 75/14 78/2 78/6 78/16 81/7 81/14 81/24 82/16 88/12 89/7 89/20 91/11 91/12 92/11 99/6 106/5 114/13 115/4 115/5 120/10 124/9 125/6 127/18 128/6 128/12 128/16 129/8 130/1 131/17 138/6 142/4 144/14 146/24 147/6 147/22 165/2 168/3 171/18 171/23 172/4 172/7 172/8 173/1 177/3 177/14 179/9 180/9 188/24 188/25 197/11 200/17 200/19 208/7 209/2 209/5 who'd [1] 189/4 who's [1] 27/11 whoever [2] 20/22 38/24 whole [22] 23/19 70/22 81/10 84/6 84/25 98/25 101/22 128/7 160/7 163/4 163/9 163/17 163/18 169/20 185/23 188/13 188/21 189/9 196/11 206/13 206/14 206/23 wholly [1] 129/7 whom [7] 19/11 61/13 76/21 76/25 156/14 158/17 204/3 whose [1] 114/23 why [26] 43/16 45/6 46/3 79/22 106/8 109/2 109/3 114/18 119/9 130/19 130/25 131/20 132/11 142/14 142/25 152/17 153/22 157/21 165/6 167/8 172/14 178/10 193/18 205/21 207/17 208/10 wide [3] 4/14 54/2 75/22 widely [1] 77/25 wider [5] 68/1 68/22 69/19 111/6 129/3 will [61] 2/21 13/22 14/13 19/20 20/25 28/15 29/4 35/6 35/13 35/19 36/5 37/8 37/14 43/13 43/23 44/3	50/23 52/3 52/16 59/11 64/4 65/20 86/6 86/10 86/13 86/14 86/16 97/9 106/25 111/4 118/22 120/3 125/11 126/16 126/17 132/13 132/14 132/17 136/13 137/22 140/1 140/3 140/5 140/8 146/11 148/20 149/17 149/25 152/9 172/21 174/2 176/11 177/19 179/10 180/20 181/12 184/9 184/19 185/20 199/2 210/17 Williams [8] 34/3 39/11 47/14 120/9 136/4 183/7 183/15 183/21 willing [1] 112/1 willingness [1] 8/1 win [3] 156/2 168/25 169/14 wisdom [1] 166/19 wish [4] 82/24 110/6 149/2 178/10 wished [1] 156/2 wishes [1] 20/15 withdraw [1] 44/2 within [23] 6/1 13/13 13/22 30/13 30/19 31/24 34/8 47/10 52/15 55/14 72/13 73/2 73/19 75/7 79/23 90/2 94/4 122/18 122/19 132/3 160/24 163/16 172/21 without [16] 18/4 40/24 60/10 70/6 99/18 99/24 99/24 113/23 131/8 131/11 131/12 133/14 143/6 163/11 169/14 181/8 WITN00690100 [1] 1/23 WITN10010100 [1] 78/21 witness [25] 1/21 2/17 2/20 30/2 32/20 32/24 47/21 48/6 78/20 79/15 103/15 110/24 138/23 138/25 139/18 158/3 158/6 201/4 201/6 201/9 201/25 202/2 202/5 202/14 210/13 woman [1] 178/11 Womble [1] 21/13 won't [1] 102/9 wondered [1] 27/14 wondering [1] 188/9 wool [1] 179/17 word [8] 2/6 2/7 23/17 93/14 97/20	145/11 184/20 187/17 words [8] 48/23 55/21 56/15 126/17 134/3 142/17 168/14 186/25 work [68] 2/3 10/18 12/1 35/19 46/20 52/3 53/6 57/14 58/2 61/8 66/6 68/23 69/6 71/25 75/23 76/3 76/4 77/23 79/10 86/9 86/11 86/11 86/14 86/16 92/24 93/15 93/17 93/18 93/25 94/20 94/24 97/9 101/4 109/22 110/3 110/4 110/7 111/4 111/23 112/18 112/23 113/1 113/8 115/19 117/9 117/22 117/24 117/25 118/7 118/19 119/3 120/18 120/19 122/24 123/2 126/8 126/10 126/13 126/23 133/1 133/8 134/1 134/5 135/22 163/7 163/20 168/5 201/22 worked [4] 31/6 48/2 81/24 184/7 working [10] 10/6 12/13 29/7 43/8 105/1 105/1 121/21 173/1 192/5 192/19 workload [2] 38/23 163/22 works [2] 125/3 199/3 without [3] 46/20 121/20 175/15 worlds [1] 175/15 worried [1] 152/25 worry [1] 141/13 worrying [1] 10/15 worse [2] 56/10 181/12 worth [5] 17/23 87/20 123/15 145/6 185/8 worthy [1] 74/24 would [192] 2/10 5/20 6/17 6/20 6/21 6/24 7/21 7/23 8/4 8/18 8/19 10/25 11/4 14/2 14/4 14/6 15/2 15/8 15/10 15/22 15/24 16/10 17/17 18/24 19/25 20/3 20/22 21/6 21/6 22/4 23/11 24/8 24/12 26/10 26/12 27/1 27/6 27/9 31/14 31/20 31/24 33/17 33/18 36/9 36/22 38/23 39/1 40/1 42/12 43/22 44/18 44/21 44/25
----------	---	---	--	---

<p>W</p> <p>would... [139] 46/23 50/11 51/18 52/17 52/20 53/1 56/11 56/24 57/2 57/3 57/7 57/11 57/13 57/16 57/21 57/23 58/15 62/3 64/3 64/20 66/8 68/7 68/16 69/1 69/12 74/21 75/22 76/6 77/4 77/6 77/7 77/23 78/5 78/11 79/5 81/1 81/2 81/4 81/21 82/7 82/8 82/16 83/14 84/7 86/18 93/10 95/15 96/2 96/7 96/17 98/6 98/14 100/5 100/9 100/11 104/6 106/3 106/4 108/9 108/18 113/18 116/10 119/21 120/15 121/4 121/5 122/6 122/13 122/14 124/4 125/14 127/19 129/5 130/20 131/1 132/19 133/2 133/8 134/5 134/12 135/2 137/4 141/22 144/9 147/7 148/15 150/9 150/22 150/25 153/19 153/20 154/5 154/15 155/4 159/16 159/20 164/1 165/6 165/9 165/15 168/13 168/15 169/2 169/12 171/5 171/22 172/24 173/5 174/21 174/22 174/24 175/9 175/11 175/16 177/5 178/10 179/17 180/12 182/3 182/25 189/2 191/18 191/20 194/4 194/5 194/14 200/1 201/10 201/13 201/20 203/1 203/9 203/15 204/8 204/13 206/19 206/22 207/14 209/23</p> <p>wouldn't [12] 22/3 22/4 46/20 46/22 47/15 59/7 74/1 90/2 161/5 175/7 178/7 207/15</p> <p>wrists [1] 104/21</p> <p>write [3] 110/1 113/14 123/10</p> <p>writes [2] 126/3 182/21</p> <p>writing [7] 27/21 37/12 78/13 78/14 86/18 96/10 113/11</p> <p>written [10] 28/4 87/9 102/4 113/20 123/12 123/16 157/8 166/7 171/21 173/22</p>	<p>wrong [15] 14/11 77/22 79/20 95/9 95/21 95/22 95/23 98/1 99/1 128/5 143/8 144/4 151/18 154/17 163/18</p> <p>wrongdoing [3] 19/3 19/16 190/20</p> <p>wronged [1] 129/8</p> <p>wrongly [6] 41/7 71/24 106/1 121/2 129/3 199/18</p> <p>wrongs [2] 179/21 179/22</p> <p>wrote [1] 123/19</p> <p>Wyn [2] 88/14 154/13</p> <hr/> <p>Y</p> <p>yeah [108] 3/14 4/9 8/6 13/7 27/5 27/5 29/25 31/6 31/17 33/1 40/22 41/11 46/14 47/1 47/11 49/20 55/12 58/17 58/18 60/17 60/19 60/23 65/2 66/14 66/14 67/10 67/10 69/13 73/9 73/16 74/7 74/9 76/10 76/12 76/16 76/17 76/20 80/17 80/22 81/9 82/5 85/24 86/24 90/7 90/9 91/6 93/23 94/11 94/11 97/2 107/9 107/20 109/8 109/11 111/1 113/20 115/15 120/5 120/5 130/15 131/7 144/12 146/5 159/15 159/15 159/22 159/24 161/19 162/1 166/10 166/15 177/7 181/9 185/2 185/2 185/4 185/6 187/5 188/11 189/22 190/2 190/2 190/4 190/6 190/14 190/14 190/22 191/9 191/9 191/11 191/17 196/25 200/21 201/8 201/15 202/1 202/13 202/16 202/18 202/19 204/1 204/5 204/15 204/21 205/1 206/17 207/7 208/18</p> <p>year [5] 9/6 25/24 94/3 141/4 147/23</p> <p>years [23] 3/2 3/16 4/4 11/1 12/14 12/21 17/14 22/23 24/8 24/12 24/22 28/16 30/23 52/22 56/4 91/5 95/8 95/15 95/16 123/8 159/11 162/16 167/13</p> <p>years' [1] 63/6</p>	<p>yellow [1] 195/22</p> <p>yes [115] 1/4 3/3 3/15 8/17 13/16 22/7 32/7 33/19 33/24 34/5 34/12 34/20 38/7 39/4 40/11 40/14 46/12 48/9 49/19 49/22 51/17 53/10 53/17 57/22 71/8 71/25 74/5 75/25 76/19 76/23 78/19 80/8 80/10 82/13 84/8 87/6 88/10 89/2 90/22 91/2 93/13 95/19 95/24 100/2 101/16 102/5 102/5 103/13 105/9 105/10 113/16 114/2 114/9 115/11 116/17 116/24 117/4 120/4 125/8 125/10 126/21 126/22 128/24 131/10 131/19 131/22 135/24 135/25 137/16 138/3 141/25 143/6 143/19 145/19 146/16 146/20 150/15 162/22 164/7 164/13 174/18 174/22 179/17 182/19 182/20 186/18 186/19 187/21 187/22 187/23 187/24 188/2 188/3 188/6 188/7 188/9 188/16 189/18 189/24 191/1 191/21 192/24 193/7 194/18 196/23 197/23 201/22 204/12 206/11 207/25 208/1 208/2 208/3 210/11 210/19</p> <p>yesterday [3] 14/16 129/22 160/22</p> <p>yet [2] 161/13 174/7</p> <p>yielded [1] 76/4</p> <p>you [1031]</p> <p>you'd [8] 47/9 67/7 89/6 130/12 202/2 203/5 203/7 203/15</p> <p>you'll [12] 6/5 6/12 9/5 48/22 73/5 91/11 91/12 120/6 143/12 160/14 160/16 166/12</p> <p>you're [46] 23/14 24/2 25/21 27/10 27/10 51/15 57/5 76/19 87/24 92/15 93/21 100/8 103/4 109/11 128/19 129/13 143/8 151/10 155/11 165/19 169/7 170/5 171/15 171/19 172/14 177/9 177/22 178/17 178/20 180/13 183/13 186/3 187/3 187/3 188/7 188/7 191/10 191/20 193/1 193/5</p>	<p>193/14 194/2 194/12 196/4 204/11 207/22</p> <p>you've [29] 1/21 23/25 25/8 31/9 31/11 53/24 90/16 101/14 105/14 138/22 145/23 146/3 146/4 147/5 160/3 171/23 177/8 178/24 187/6 187/16 187/25 188/14 189/13 191/3 197/24 198/16 199/19 207/5 209/13</p> <p>your [165] 1/18 2/14 2/18 2/25 3/15 4/3 4/6 5/17 5/21 7/11 9/6 9/20 9/21 11/9 12/1 13/11 14/22 14/25 16/17 17/3 20/22 21/2 27/21 29/2 29/3 29/6 29/11 30/2 33/16 35/2 37/1 39/18 40/19 41/22 43/8 43/12 43/14 43/20 44/11 44/16 45/10 47/21 48/6 48/7 51/24 53/24 54/5 55/16 58/24 76/24 76/24 80/10 84/12 85/9 85/16 89/3 93/1 93/22 95/11 95/18 96/17 100/19 101/3 101/18 103/6 107/4 107/10 107/14 110/24 111/18 111/18 112/21 114/13 115/16 115/25 116/21 117/3 119/21 120/1 120/3 123/6 123/19 125/15 125/19 126/9 126/11 127/25 128/4 128/15 130/18 131/11 135/3 135/23 136/2 138/23 138/25 139/2 145/7 150/16 151/15 152/11 154/8 154/20 154/20 154/21 155/1 159/25 162/15 162/20 163/17 163/18 166/3 166/17 166/18 167/24 169/1 169/23 169/24 170/2 171/9 171/12 172/9 173/21 174/19 175/6 175/7 176/3 176/23 176/25 177/3 178/25 179/4 179/14 180/22 181/12 183/11 183/19 186/15 188/12 189/14 191/2 191/2 194/16 194/17 194/23 196/17 197/19 197/22 198/18 198/20 198/22 200/10 201/4 201/5 201/6 201/7 201/9 201/23 201/24 201/25 202/2 202/14 204/16 206/24</p>	<p>206/25</p> <p>yourself [7] 7/12 23/21 174/16 175/24 197/6 199/12 210/5</p>
--	--	--	---	--