

Friday, 13 October 2023

(10.00 am)

MR BLAKE: Good morning, sir, can you see and hear me?

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

MR BLAKE: This morning we're going to hear from Mr Inwood.

PAUL INWOOD (sworn)

Questioned by MR BLAKE

MR BLAKE: Thank you. Can you give your full name, please?

A. Paul Inwood.

Q. Thank you very much Mr Inwood. In front of you, you should have a witness statement?

A. Yes.

Q. Is that witness statement dated on the final page 15 May 2023?

A. It is, yes.

Q. Is that signature on your page?

A. It is.

Q. Is that statement true to the best of your knowledge and belief?

A. It is.

Q. Thank you very much. That witness statement has the Unique Reference Number of WITN05780100.

1

support people within the company in terms of managing day-to-day issues that would happen in a postmaster's life-cycle, for example insolvency, death in service. And those policies were developed either upon demand from internal clients or because I noticed that there was a sort of gap in the current approaches, possibly caused by statute or other gaps in the way that we are managing the relationship with postmasters.

The second part was to develop either variations to the existing contracts, and I refer to, like, the traditional contracts, which were the subpostmaster contract and variants of that, or to develop new contracts for postmasters, normally in response to, like, a set piece business transformation programme, such as Network Change or Network Transformation.

Q. Thank you very much.

Could I ask, you're a little bit quiet. Could you possibly come slightly closer to the microphone, not on top of them but slightly closer. Thank you.

Can you tell us where in the Post Office

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That witness statement will be published on the Inquiry's website in due course.

Mr Inwood, you worked for the Post Office for a period of over 30 years.

A. That's right.

Q. I think you started as a postal officer, serving customers in a Crown Post Office branch?

A. That's correct, yes.

Q. You were Assistant Branch Manager and then Manager. You became Area Manager?

A. Mm-hm.

Q. Between 2002 and 2004 you were the Contracts Manager for the eastern side of South East England; is that correct?

A. That is correct, yeah.

Q. Then you held number of different roles, Rural Development Manager, Contracts Development Manager, and the most significant for today's purpose is, 2011 to 2018, you were Contracts and Policy Development Manager?

A. I believe those are the dates, yeah.

Q. Thank you. Can you briefly describe that final role for us?

A. Well, it -- there were two parts to at. The first part was to develop policies that would

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hierarchy did that role sit?

A. It was a senior managers role. But it was -- the people I were reporting into, you know, were probably two to three steps removed from the ExCo.

Q. Can you give us examples of who it was that you were reporting into during that period?

A. Latterly it was Nick Beal, who managed the Agents Development Team that looked after postmasters' remuneration and the contract and policy developments. You know, Craig Tuthill, similar, but he was -- similar level, but he was looking after the Contracts team. That is the Contracts Advisers that would deal with the day-to-day postmaster issues.

Q. Did you have any cause to liaise with those higher up in the Executive, for example?

A. No.

Q. I want to start by asking you about what we know as Legacy Horizon in the early years of Horizon. Can we, please, turn to POL00006666, please. This is a document that I'm going to come back to a number of different times today. So, just to assist us, can you tell us what this document is?

4

1 A. I can't see it on the screen.
 2 Q. It should hopefully come up on your screen.
 3 This may be the second time it's happened: it
 4 may not be turned on.
 5 Ah, somebody is running over to assist.
 6 Can you see it on your screen now?
 7 A. Yes.
 8 Q. It's a document we'll return to a number of
 9 times this morning. Can you assist us with the
 10 circumstances in which you came to be talking to
 11 a solicitor at Womble Bond Dickinson?
 12 A. I think this is what was referred to as the
 13 witness proofing statement that was taken in,
 14 I think, January 2018, in advance of the Group
 15 Litigation Order.
 16 Q. It looks as though you were sitting down with
 17 somebody called Victoria Brooks, who was
 18 a managing associate at Womble Bond Dickinson?
 19 A. That's correct, yeah.
 20 Q. What was the purpose of the meeting?
 21 A. I think the purpose of the meeting was for them
 22 to ask me a whole bunch of questions about my
 23 experiences in the company and to see the extent
 24 to which that would be helpful with POL's
 25 position in the Group Litigation.

5

1 A. Mm.
 2 Q. Then she says, "Yeah," and you say:
 3 "You know.
 4 She says:
 5 "Did you find it to the extent that you've
 6 used it -- how did it compare to the manual
 7 system?"
 8 You say:
 9 "You know, it's er, it was less reliance on
 10 mental processing -- because you know you push
 11 a button and the system works out the balance
 12 due to the customer."
 13 Sorry, could we just stay on page 64. I'm
 14 going to start, actually, slightly higher up,
 15 about halfway. Could we zoom out slightly.
 16 It's halfway down there, I'm going to start
 17 slightly higher up:
 18 "My understanding is that advent of
 19 automation at least in the directly managed
 20 estate improved that situation ...
 21 "Because all right if you put garbage in you
 22 get garbage out."
 23 She says, "Yeah".
 24 Then you say:
 25 "But a calculator is less inclined to make

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1 Q. Were you involved in the Group Litigation
 2 outside of this?
 3 A. No, no.
 4 Q. 2018 is also the year, I think, that you left
 5 the Post Office?
 6 A. That's correct.
 7 Q. Is there any connection between the Group
 8 Litigation --
 9 A. No.
 10 Q. -- matters and your departure?
 11 A. No.
 12 Q. No. Can we please turn to page 64. Are you
 13 able to assist us with why you left the Post
 14 Office?
 15 A. Contract came to an end.
 16 Q. I'm going to take you through a page and a half
 17 of the transcript between you and the solicitor.
 18 I'm going to start about halfway down and it's
 19 where -- "PI" is you and "VB" is Victoria Brooks
 20 of Womble Bond Dickinson. You say there:
 21 "My understanding is the advent of
 22 automation at least in the directly managed
 23 estate improved that situation."
 24 That was a situation about the difficulty
 25 adding certain figures up, et cetera?

6

1 mental mistakes than a human being."
 2 A. Mm.
 3 Q. She says:
 4 "Yeah, that's true.
 5 "PI -- And effectively Horizon is
 6 a calculator."
 7 A. Mm.
 8 Q. Just pausing there, "calculator" is
 9 a description we've heard before and it's
 10 a description we'll hear again today. Where did
 11 that description come from?
 12 A. I think when automation was introduced into the
 13 Crown Post Office estate, there was evidence
 14 that the shortages were reduced because of that.
 15 So my understanding was that the advent of
 16 automation would result in fewer discrepancies.
 17 Q. But a calculator can be very simple --
 18 A. Yeah, it's --
 19 Q. -- it can be used by children.
 20 A. It's a simplification of something that's more
 21 complicated, yeah.
 22 Q. Where do you think that term came from, was that
 23 a term your colleagues used or --
 24 A. Yeah, it's one that I'd heard used internally.
 25 Q. Then if we go below that it says:

8

1 "Did you ever work in branch [something]
2 Horizon was installed -- I've forgotten the
3 timeline."

4 A. Mm.

5 Q. You say:

6 "I did because what I used to do when I was
7 an area manager was I used to go out at
8 Christmas and because BMs [I think that 'PMs',
9 must be] were too busy to talk, branch manager,
10 and to be visible I would go and work on the
11 counter alongside a colleague and I still do
12 that actually but in a slightly different way --
13 so I had used Horizon and ... it was a brilliant
14 system."

15 A. Yeah, "BMs" is an abbreviation of branch
16 manager, yeah, not -- it's not PM.

17 Q. Branch manager, thank you. You described
18 Horizon there as a "brilliant system". Can you
19 assist us with how it was that in 2018 you still
20 considered Horizon to be a brilliant system?

21 A. Well, I'd used it personally and I'd not
22 encountered any problems using it. That said,
23 I'd never completed a balance at the end of the
24 week around that time. As I said, we would go
25 out in times of Christmas pressure and execute

9

1 processing -- because you know you push a button
2 and the system works out the balance due to the
3 customer."

4 She says:

5 "Yeah, that's true."

6 If we go over the page:

7 "And from the customer -- but it also
8 reminds you what you have to take from them or
9 give to them in terms of the products.

10 "VB -- Yep.

11 "PI -- So in my view ... it was a real
12 watershed.

13 "VB -- Yeah.

14 "PI -- In the way we interfaced with the
15 customer.

16 "VB -- Ok.

17 "PI -- And we saved time because at the end
18 of weekly balancing procedures were much quicker
19 ... so if you ... had you know a postmaster ...
20 I think it's quite intuitive."

21 So, again, that comment has to be taken in
22 the context that you hadn't actually completed
23 a weekly balancing procedure?

24 A. Earlier on when I was a branch manager, then
25 yeah, there would be weekly balancing of

11

1 transactions using Horizon. So it wasn't
2 perfect but I'd found it fairly intuitive to
3 use.

4 Q. So you would place entries onto the system --

5 A. Yes.

6 Q. -- but you wouldn't ever balance the system?

7 A. You may do a cash declaration at the end of the
8 day but not check all of the stock, so that you
9 know that there hadn't been a major problem
10 caused by me during the day.

11 Q. So the comment that it was a brilliant system is
12 based on occasional use --

13 A. Yes.

14 Q. -- and occasional use that doesn't involve the
15 Wednesday balance?

16 A. Yeah, and, obviously, it wasn't made with the
17 benefit of hindsight.

18 Q. She says, "Yeah".

19 You say, "You know".

20 She says:

21 "Did you find it to the extent that you've
22 used it -- how did it compare to the manual
23 system?"

24 You say:

25 "You know ... it was less reliance on mental

10

1 individual stock units and there would be a cash
2 account produced which is an amalgam of all of
3 the stock accounts for all of the stock units
4 but that was an automated environment
5 pre-Horizon.

6 Q. Yes, and your reference there to saving time
7 because the balancing procedures were much
8 quicker, that wasn't because you had actually
9 used Horizon and carried out that out yourself,
10 that was --

11 A. No, that was anecdotal.

12 Q. Anecdotal?

13 A. Yeah.

14 Q. Why did you think it was much quicker?

15 A. Because I think when automation was introduced
16 into the Crown and the Agents Estate, the
17 narrative was that there were time savings in
18 the production of the weekly cash account. You
19 know, when I was doing manual accounts, you
20 know, you could easily be there an hour and
21 a half to two hours on a Wednesday evening and
22 I think in the Crown estate efficiency savings
23 were made when automation was introduced. So it
24 would be reasonable to think that it was quicker
25 when automation was introduced into the agency

12

1 estate.

2 **Q.** You described it as the "narrative". Where was

3 that coming from?

4 **A.** There were business efficiency teams within POL

5 and, you know, you would hear about savings that

6 had been made in the Crown Post Office estate

7 and, anecdotally, from postmasters that it was

8 faster to produce not just the balance but the

9 weekly cash account in an automated environment.

10 **Q.** So you've described there the weekly balancing

11 being quicker and that it's quite intuitive.

12 This Inquiry has heard quite a lot of evidence

13 to the contrary: long periods of time on, for

14 example, the helplines; unhelpful helplines;

15 difficulty with actually using the system,

16 balancing it -- putting aside bugs, errors or

17 defects, just pressing wrong keys and things

18 like that. Were you not familiar with those

19 kind of complaints in 2018?

20 **A.** Well, I didn't receive complaints directly but,

21 where there were discrepancies in accounts, then

22 clearly it could take longer to bottom out those

23 discrepancies or sometimes the discrepancies

24 wouldn't be resolved at that point. And,

25 therefore, the postmaster would have to roll

13

1 know why would our EPOS be inaccurate and no one

2 else's is ..."

3 Pausing there, how would you know that

4 nobody else's EPOS system was inaccurate?

5 **A.** Just speaking from person experience. I'd not

6 received or couldn't recall any evidence that

7 there was a problem with the EPOSS.

8 **Q.** You're referring there to nobody else's being

9 inaccurate; are you referring to other companies

10 that use an EPOS system?

11 **A.** Yeah.

12 **Q.** Did you consider, for example, whether other

13 companies prosecuted on the basis of data

14 produced by the EPOS system?

15 **A.** Not at that point but I'd had meetings with

16 other franchisors and didn't seem to be any

17 evidence that they'd had these problems with

18 their EPOS systems because we would often talk

19 about their approaches to contract breach.

20 **Q.** Who do you have in mind?

21 **A.** McDonald's was one example.

22 **Q.** Do McDonald's prosecute on the basis of data

23 provided by their EPOS system?

24 **A.** Do they?

25 **Q.** Yes.

15

1 over into another balancing period and accept

2 those discrepancies at that point and hope that

3 an error notice or a transaction correction

4 would come back.

5 **Q.** So where you've said the balancing procedures

6 were quicker, in fact, what you mean, really, is

7 that pressing the button to calculate the total

8 is quicker?

9 **A.** Yes.

10 **Q.** But there could be a whole host of problems with

11 that process?

12 **A.** If everything went okay, it would be quicker.

13 If things didn't go okay and there was

14 a discrepancy, then, clearly, that would take

15 some remediation to get to the bottom of that

16 and, therefore, it would not have been quicker.

17 **Q.** Did you think about that at this time when you

18 were answering these questions? Was that

19 something on your mind --

20 **A.** Err, no. Not reacting to the questions that

21 were put to me, no?

22 **Q.** You then said:

23 "I've never seen in the evidence that it was

24 inaccurate. It's er it's a calculator plus and

25 it does a whole lot more than that obviously you

14

1 **A.** Well, if there are problems internally, I would

2 imagine they would but I've not seen any

3 evidence of that.

4 **Q.** I mean, looking back at this account here, do

5 you think that you gave enough thought there to

6 the implications of relying on the EPOS system

7 and its comparison with a company like

8 McDonald's?

9 **A.** Not in the moment.

10 **Q.** How about now?

11 **A.** Well, over the last two or three years, I've

12 read a lot that's now in the public domain

13 regarding the integrity of the Horizon system

14 and, at various points, I've tried to think back

15 of specific examples where I'd seen evidence

16 that it was unreliable.

17 **Q.** Yes. One task for this Inquiry is really to

18 understand why, in 2018, people from the Post

19 Office in quite senior roles, like yourself,

20 considered that Horizon was a calculator and

21 that why would your system be inaccurate if

22 nobody else's is. Where does that mindset come

23 from? What was it within the company that was

24 telling you that?

25 **A.** I think there was a narrative internally that

16

1 spoke to the integrity of the system and the
 2 narrative was that the system was robust.
 3 **Q.** Can you tell us where that narrative was coming
 4 from?
 5 **A.** Fairly senior levels in the company but it was
 6 discussed broadly at my level when I had
 7 meetings with contracts team. There was never
 8 any suggestion that discrepancies at audit had
 9 been caused by the system.
 10 **Q.** Are you able to assist us, in particular, with
 11 anybody, in particular, who you had those kinds
 12 of conversations with, who reassured you?
 13 **A.** It's quite difficult to think back for specific
 14 individuals. I'm talking about, you know,
 15 a large community where there was almost like
 16 a corporate groupthink, that the system was
 17 robust but not foolproof. Sometimes, the system
 18 would crash. That was happening back when I was
 19 a Contracts Manager 2002 to 2004; data could be
 20 lost, in the event of that happening.
 21 So it clearly wasn't completely foolproof
 22 but nor was there any trend of cases that I'd
 23 seen where the EPOS system had caused phantom
 24 discrepancies in people's accounts.
 25 **Q.** Where you say "trend", I mean, how was it that
 17

1 the postmaster had claimed that the discrepancy
 2 was caused by Horizon, and I've obviously read
 3 that there were hundreds of other claims that
 4 emerged during the course of the Group
 5 Litigation and beyond that.
 6 **Q.** Yes, but in terms of your personal knowledge,
 7 you're saying there was one occasion when there
 8 was a complaint made about the system?
 9 **A.** I can think of one but that's only because I saw
 10 an email exchange in the bundle.
 11 **Q.** Which one was that?
 12 **A.** I can't remember the name of the post office.
 13 **Q.** Okay, it may be that we come to it, I'm just
 14 going to read on a few more lines, she says:
 15 "Can I ask you what you think the biggest
 16 weakness in Horizon is from your experience?"
 17 You say:
 18 "I think probably there are too many screens
 19 to go through to get to what you want to it do.
 20 Sometimes it was awkward to remember where
 21 things are and in order to get to where you want
 22 to go you have to remember which screen you have
 23 to go through. You know the printer was
 24 probably too slow and noisy but we are improving
 25 it and it has changed a lot recently I think
 19

1 people would prove that to you?
 2 **A.** Well, there was never any attempt to prove
 3 a negative, that, you know, the system was
 4 completely foolproof and there were no examples.
 5 There were, from time to time, examples where
 6 data was lost to do with power outages or the
 7 equipment crashing, that there would have had to
 8 be some attempt at remediation of the
 9 postmaster's accounts.
 10 **Q.** Did you not receive complaints over the years
 11 from subpostmasters that there were more
 12 significant problems with Horizon?
 13 **A.** When -- over the two or three -- period when,
 14 you know, information entered the public domain
 15 regarding flaws in the system and when
 16 I completed your questionnaire, I thought back
 17 long and hard for specific examples where it had
 18 been put to me directly that a discrepancy had
 19 been caused by the system and I couldn't think
 20 of any specific examples at those points in
 21 time.
 22 **Q.** Can you think of examples now?
 23 **A.** I can because I've seen one that was disclosed
 24 to me quite late this week, where there was
 25 an email exchange around one specific case where
 18

1 there is no major issue with it really."
 2 She says:
 3 "It's interesting to speak somebody about
 4 that who has got experience of both.
 5 "PI -- I don't think anyone would want to go
 6 back to a manual.
 7 Then she says:
 8 "That's what we should ask them shouldn't
 9 we? We should ask subpostmasters if they want
 10 to go back to that."
 11 So in this discussion in 2018 you hadn't
 12 recalled that one occasion when a complaint --
 13 **A.** No.
 14 **Q.** -- had been made about the system?
 15 **A.** No, I had not.
 16 **Q.** Were you in any way playing things down in this
 17 conversation with the lawyer?
 18 **A.** No, I was just responding to their questions.
 19 **Q.** Can we also bring up your witness statement, so
 20 WITN05780100, please. We've talked a little bit
 21 about using the system and some difficulties
 22 that some subpostmasters may have had using the
 23 system. Can we look at paragraph 23, please,
 24 and that's page 4.
 25 At paragraph 23, you say you do not feel
 20

1 that any improvements could be made to the
 2 training given to subpostmasters. Do you still
 3 think that's correct?
 4 **A.** Based on my experience during the period of time
 5 I was in the company, I wouldn't change that.
 6 **Q.** Could we look at POL00093184. This is a letter
 7 to you from somebody called Laurence Green; is
 8 that somebody you remember?
 9 **A.** I haven't but I've got a vague recollection of
 10 this when I read it this week.
 11 **Q.** Can you remember who he was at all?
 12 **A.** I think he was either a -- he was probably
 13 a postmaster.
 14 **Q.** He is there writing to you following an NFSP
 15 Eastbourne branch meeting.
 16 **A.** Mm.
 17 **Q.** Does that assist you at all? Might he have been
 18 a representative of some sort or --
 19 **A.** He may well have been.
 20 **Q.** This was 2004 so you were Contracts Manager for
 21 the eastern side of South East England at the
 22 time?
 23 **A.** Yeah, that was, I think, coming to the end of my
 24 period of time as the Contracts Manager, yeah.
 25 **Q.** Thank you, if we could scroll down to the bottom

21

1 this system."
 2 Can you tell us what was the "zero balancing
 3 system"?
 4 **A.** No, I've got -- I don't know what he's referring
 5 to. Perhaps it's that you have to balance the
 6 accounts and accept discrepancies identified by
 7 the system. That's a guess.
 8 **Q.** He says:
 9 "I advised that you had stressed that there
 10 is only one policy universally applied and that
 11 no one postmaster could be allowed to be
 12 an exception."
 13 It says:
 14 "15 members reported that they had not been
 15 trained in, nor were they aware of the
 16 requirement for zero balancing. All reported
 17 that if a discrepancy occurs during a holiday it
 18 is not adjusted by the locum but is dealt with
 19 on the postmaster's return. Also they operate
 20 the 'old system' of showing any discrepancy in
 21 the final cash account and then making it good.
 22 "They were dismayed that they could be
 23 disciplined and threatened with loss of contract
 24 for not using a procedure of which they, like
 25 me, were unaware and in which they are

23

1 of this page. He says at the very bottom:
 2 "Most, like me, have received no system
 3 training from the Post Office throughout their
 4 careers. In 24 years, excepting various sales
 5 training initiatives and a laptop based product
 6 knowledge evening, my total system training
 7 amounted to one day for Horizon plus two
 8 assisted balances when Horizon went live. When
 9 I took on my first office in 1980 I learned from
 10 a fellow postmaster and paid for his help."
 11 Pausing there, were you aware, therefore, of
 12 historic complaints of training concerns even
 13 pre-Horizon?
 14 **A.** I think, from time to time, postmasters -- or
 15 I would identify a capability issue with
 16 a postmaster, as opposed to an integrity issue
 17 and, from time to time, I would ask either the
 18 training team or, perhaps, one of the field team
 19 just to give them a bit of extra support, you
 20 know.
 21 **Q.** He says there:
 22 "Two newly appointed postmasters were in
 23 attendance and they advised that they had been
 24 made aware of and had been trained in, the zero
 25 balancing system, on appointment, and followed

22

1 untrained."
 2 So that's 15 members from your region
 3 complaining about difficulties, a lack of
 4 training. Do you recognise those complaints at
 5 all?
 6 **A.** I think that part to the South East was managed
 7 by a different Contracts Manager. I don't know
 8 what he's referring to here because, clearly,
 9 the postmasters had been trained to balance
 10 their accounts on Horizon and I'm not sure what
 11 the change is here. I've got no recollection of
 12 that.
 13 **Q.** He says:
 14 "It may be that our branch is unique in this
 15 matter and that the policy has been successfully
 16 rolled out to all our colleagues. It seems more
 17 likely from experience that this policy is as
 18 yet far from universal in its application and is
 19 hampered by poor communication and lack of
 20 training.
 21 "From our correspondence I had assumed that
 22 I was the only one at fault and out of step.
 23 I now wonder how many others are in the same
 24 position as my branch colleagues and me."
 25 Do you remember that correspondence at all?

24

1 A. No.

2 Q. No? Do you know why he might have felt that he

3 was the only one at fault? That's certainly

4 a phrase or a phrase similar to one we've heard

5 before in this Inquiry.

6 A. Well, I've heard it said that a lot of

7 postmasters, when they reported problems with

8 the Horizon system to our helpline they were

9 told "Well, you're the only person that's got

10 a problem with it". So what he's saying there

11 is consistent with what many other people have

12 said.

13 Q. Yes, and did that stick in your memory at all?

14 A. It doesn't stick in my memory, no, not this

15 specific case or any others similar to that.

16 Q. Do you agree that in 2004 you had received

17 complaints -- that's from relatively early on in

18 the life of Horizon -- about a lack of training?

19 A. It was either sporadic complaints that someone

20 felt that they needed more training to cope with

21 the system or because I'd identified a problem

22 that was to do with capability where I'd

23 identified the need for more support.

24 Q. We'll come to the policies in due course but,

25 when it came to formulating various policies,

25

1 could be any aspect of the way they operated the

2 business.

3 Q. So we have this letter from 2004. Are you aware

4 of it being followed up and those people being

5 trained?

6 A. I've got no recollection of that, no.

7 Q. Can we, please, look at POL00114930, please.

8 We're now moving forward to 2009. Can we go

9 over to the second page. It's a chain of emails

10 in 2009. Can we look at the bottom half of that

11 page, please. I'm going to start here with

12 an email from Jessica Madron. Do you remember

13 who she was? She was in Legal Services --

14 A. She was a principal lawyer in Post Office Legal

15 Services.

16 Q. Can you assist us with the recipients of this

17 email, how senior they were, what kind of roles

18 they held?

19 A. Tracy Marshall was my line manager at the time.

20 I think the people that were cc'd intended to be

21 more junior in the hierarchy of the

22 organisation.

23 Q. Thank you. I'll briefly read some of this

24 email. Do you recall having received this?

25 A. Well, I -- only this week, you know, I don't

27

1 did you have in your mind at all difficulties

2 that subpostmasters may have with training?

3 A. Well, the company had a policy that was already

4 in place to deal with what were capability

5 issues with postmasters and there was a process

6 that sat alongside that. So they could be

7 offered either, upon their request or upon the

8 request of others that worked for POL,

9 additional training and support, and that would

10 be delivered by the training team, perhaps, or

11 their Area Manager.

12 Q. But did any lack of training or issues with

13 training feature in any way in your thinking

14 when you were drafting various policies?

15 A. What years later?

16 Q. Yes.

17 A. Err ... no, I don't think it did. I think that

18 the people that had a close relationship with

19 postmasters like Area Managers, Field Advisers,

20 Contracts teams, were quite adept at identifying

21 where there were capability issues and providing

22 additional support. So that was just something

23 that happened, really, across a whole range of

24 issues in a postmaster's life-cycle. It wasn't

25 necessarily connected to their accounting, it

26

1 have any recollection, back to 2009, of this

2 case, no.

3 Q. It's entitled "letter from BERR" -- that's now

4 the Department for Business -- "re challenge to

5 Horizon integrity". It says there:

6 "A reporter has written to her MP referring

7 to conversations she has had with

8 a [subpostmaster] to the effect that the Horizon

9 system is faulty and shows deficits where there

10 are none and that POL [Post Office] just

11 reclaims these deficits from [subpostmasters].

12 There is also reference to a website for

13 [subpostmasters] who have been 'victims' of [the

14 Post Office's] approach."

15 Why would you be contacted in this regard?

16 A. Because my job title included the word "agent"

17 or "postmaster", I would often be sent or copied

18 in on emails that related to agent postmasters.

19 Q. When you say because your job title included

20 that, what do you mean by that?

21 A. Well, if something was not to do with the Crown

22 Post Office and it was to do with a postmaster,

23 I would often find myself being copied in on

24 something.

25 Q. Because you were --

28

1 A. Either for information or because I was being
 2 asked to say or do something specifically in
 3 response to the email.
 4 Q. So, in this particular email, you were in the
 5 "to" list rather than the "cc" list?
 6 A. That's correct, yeah.
 7 Q. So does that signify to you that somebody
 8 thought you were the appropriate person,
 9 alongside Tracy Marshall, to address this issue?
 10 A. Correct, yeah.
 11 Q. Can we look at the first page and I'm going to
 12 take you through an email, the response from
 13 you. Thank you, so you say:
 14 "Dear Jessica ...
 15 "... I have some experience of this type of
 16 complaint from my time as a Contracts Manager."
 17 So just pausing there, we spoke about half
 18 an hour ago, or so, about whether you had
 19 received complaints and you couldn't recall any
 20 during your conversation in 2018. You then
 21 recalled one, having seen the documents in the
 22 bundle.
 23 A. Yeah.
 24 Q. This certainly suggests that you did have more
 25 than just one complaint from a subpostmaster?

29

1 loss?
 2 A. Well, I don't -- the postmaster's ability to
 3 interrogate the system was limited. So, for
 4 example, they could look at event logs to see
 5 who had had access to the system, they could
 6 look at transaction logs to see the detail of
 7 the transactions processed through the system,
 8 and it would be possible to perform some type of
 9 reconciliation between physical documents and
 10 what the system was producing.
 11 But I think that their ability to
 12 interrogate the system was limited.
 13 Q. Looking back at this now, do you think that that
 14 was too high a hurdle for a subpostmaster to
 15 overcome, to substantiate that there had been --
 16 that they had to provide evidence?
 17 A. Yeah, I think looking back on it now, I don't
 18 think many postmasters would have the capability
 19 or the resources or the time to perform, you
 20 know, a long audit of their own work in the
 21 system in order to detect why discrepancies had
 22 happened.
 23 Q. Even if they could compare certain physical
 24 documents with what is on screen, if a bug,
 25 error or defect affected the data that was on

31

1 A. From 2002 to 2004.
 2 Q. Yes.
 3 A. Yeah.
 4 Q. That was the context of my questioning earlier
 5 as well, about the early days of Horizon and
 6 I think you could only recall one, having seen
 7 documents, but it's clear here that in 2009 you
 8 could recall that you had received a fair few
 9 more?
 10 A. I can't say how many but more than one.
 11 Q. You go on there to say:
 12 "From time to time, either existing agents
 13 or those suspended/terminated due to accounting
 14 irregularities/unpaid debts, will say that it is
 15 'the Horizon system that has caused the loss'.
 16 On each occasion I had asked a [subpostmaster]
 17 to substantiate the allegation, they had been
 18 unable to provide any evidence to support it."
 19 Now, "from time to time" suggests certainly
 20 more than one, probably a fair few, given that
 21 it's from time to time.
 22 A. Over a three-year period, yeah.
 23 Q. "Unable to provide any evidence": how was it
 24 that a subpostmaster would be able to provide
 25 evidence that the Horizon system has caused the

30

1 the screen, do you think that they could
 2 actually identify that bug, error or defect?
 3 A. No, absolutely not, and nor would they be able
 4 to know that it was possible to access the
 5 system at the back end without their knowledge.
 6 Q. That, I think, you've said in your statement was
 7 something you only found out relatively late in
 8 the day?
 9 A. I'd heard of this around the time that the Group
 10 Litigation order was imminent.
 11 Q. You say:
 12 "In many respects, Horizon is
 13 a sophisticated calculator, and operates on the
 14 principle of GIGO -- garbage in, garbage out.
 15 It is no more likely that, with 100% accurate
 16 input, Horizon produces inaccurate outputs than
 17 a calculator would, which is extremely
 18 unlikely."
 19 I said we'll come back to this description
 20 of it being a calculator. Looking back, that
 21 can't be right, can it?
 22 A. I think that is an oversimplification of what
 23 Horizon is and I did go on to say that you
 24 couldn't say absolutely that the system was
 25 flawless.

32

1 Q. You say:
 2 "In some respects though, there are items of
 3 data transferred between other terminals
 4 in-store, and from Horizon to Home Office -- it
 5 is always possible that in these data streams
 6 electronic data could go astray, either because
 7 of human error or an IT failure, and that could
 8 cause transaction corrections to be produced,
 9 either in favour or against an agent."
 10 A. Correct.
 11 Q. You then say:
 12 "It is not possible to say, absolutely, that
 13 the system could not cause a loss or gain, and
 14 some time back when Horizon was introduced, [the
 15 Post Office] wrote off a considerable number of
 16 losses that appeared in agents' account on
 17 migration from manual accounts -- after some
 18 investigation it was not possible to show where
 19 the losses had occurred."
 20 So, quite frankly, you made very clear that
 21 there were cases where the Post Office couldn't
 22 show where the losses had occurred?
 23 A. Yeah, I think there was an issue around the
 24 physical migration from manual accounts to
 25 Horizon, where a POL employee attended the
 33

1 written-off -- perhaps the proliferation of
 2 these complaints is the outcome of that, or [the
 3 Post Office] becoming more hawkish in the way it
 4 manages debt/integrity issues."
 5 I'd like to look at the culture of the Post
 6 Office. Can you assist us with that, what seems
 7 to be described as some sort of culture shift?
 8 A. I think I'm referring back to a period of time
 9 where every postmaster would have a direct
 10 relationship with an Area Manager and all the
 11 branches were account managed. And I think, for
 12 many postmasters then, the relationship was
 13 a lot closer and they were receiving a lot more
 14 direct face-to-face support.
 15 And when I started off as an Area Manager in
 16 the '90s, I think you often used to see or hear
 17 about cases where a postmaster had requested
 18 a shortage to be written off. And I think there
 19 was possibly more leniency in that period of
 20 time and I think the change happened because of
 21 business efficiency, far fewer postmasters had
 22 that direct face-to-face relationship with
 23 postmasters and they were more reliant on the
 24 helpline.
 25 Q. Can you assist us with time periods?
 35

1 postmaster's premises, did the physical count of
 2 the cash and stock to make sure that the
 3 starting point on Horizon was accurate. I think
 4 quite a lot of discrepancies were uncovered at
 5 that point, shortages or surpluses.
 6 Q. So this would have been during the rollout of
 7 Horizon?
 8 A. It was, yeah. I've had direct experience of
 9 visiting one branch where I think there was
 10 a discrepancy, not huge, that had just happened
 11 as part of the weekly balance and, anecdotally,
 12 I think a number of other people had found that
 13 to be the case.
 14 Q. You say:
 15 "[Post Office's] approach is consistent in
 16 that when a [subpostmaster] challenges
 17 a [transaction correction], they have
 18 an opportunity to produce evidence to support
 19 their claim, and that is considered by the
 20 contracts team, and consideration can be given
 21 to writing off all or part of the loss. It is
 22 a fact that these days, far fewer losses are
 23 written off, as some years back there was
 24 a culture of weak management where some losses
 25 that were inappropriate for write-off, were
 34

1 A. Yeah, well, you know, the time when I think all
 2 postmasters had that direct account managed
 3 relationship was when I started as an Area
 4 Manager, which was probably in the early '90s,
 5 and then there were subsequent reorganisations
 6 of the business that meant that there were fewer
 7 people out in the field supporting postmasters
 8 and that just -- process seemed to continue for
 9 a long time and various business
 10 rationalisations. And, as I said, they became
 11 more reliant on their relationship with the
 12 helpline and they would see POL people in the
 13 field on far fewer occasions and, normally, when
 14 there was a problem.
 15 Q. You describe it here a "culture of weak
 16 management".
 17 A. Yeah.
 18 Q. That's a term that you used in 2009.
 19 A. Mm.
 20 Q. Did the Post Office, as at 2009, see the former
 21 approach as a culture of weak management?
 22 A. I'm not sure that the Post Office did. That was
 23 just my opinion of how things were at the time,
 24 you know. There were just decisions made in
 25 terms of writing things off that perhaps the
 36

1 losses weren't properly evidenced why that had
 2 happened. It was more -- it was probably a more
 3 sympathetic culture.

4 **Q.** Why, in 2009, would you have considered
 5 a sympathetic culture to be a culture of weak
 6 management?

7 **A.** Because, you know, there were approaches,
 8 processes, policies to follow, and it may have
 9 been that those were bent out of shape a little
 10 bit in the terms of providing outcomes for
 11 postmasters, with the best intentions: to help
 12 them.

13 **Q.** You described how, previously, the management
 14 was more regional, more local --

15 **A.** Yeah.

16 **Q.** -- and that they would have more of
 17 a relationship with the subpostmasters and that
 18 became more central.

19 **A.** Yes.

20 **Q.** What I'd like to understand is how it is that
 21 a change from somebody who knows a subpostmaster
 22 to somebody who doesn't know a subpostmaster is
 23 interpreted as the former being effectively weak
 24 and the latter being strong?

25 **A.** I think there were examples of what I've

37

1 I think, when Horizon was introduced.

2 Before postmasters were asked to repay
 3 shortages and, you know, I'll go further than
 4 that and say that there should have been
 5 a process where, if a discrepancy had arisen
 6 (*sic*) either at audit or some other way, the
 7 possibility that that discrepancy had been
 8 generated by the system and, therefore, was
 9 a phantom discrepancy should have been ruled out
 10 prior to the discrepancy being recovered.

11 **Q.** I'll just read one more sentence it says:
 12 "I think our line must be that [the Post
 13 Office] is always prepared to consider
 14 representations that are based on proper
 15 documentary evidence, and not simply an obtuse
 16 'the system did it'."

17 I think, following the evidence you've just
 18 given, your reflection on that is that that was
 19 actually too high a hurdle for subpostmasters to
 20 overcome?

21 **A.** I agree.

22 **Q.** Do you know if you were ultimately involved in
 23 the response to this complaint from the
 24 journalist and the Member of Parliament?

25 **A.** I was never involved in drafting responses to

39

1 described there as "weak" behaviours, ie not
 2 sticking to agreed policies and processes. And
 3 I think when it moved to a less -- a more
 4 central relationship, you know, the operators of
 5 helplines stuck rigidly to policies and
 6 processes.

7 **Q.** You say they stuck rigidly. Was that at the
 8 request of those who were in charge of the
 9 policies and procedures?

10 **A.** I think it was just an outcome of
 11 an organisational change, where people who were,
 12 like, Tier 1 helpline operators had less. They
 13 didn't have management discretion. You know,
 14 they were helpline operators, trying to do their
 15 best, sticking to scripts and processes, whereas
 16 Area Managers back in the '90s, I think, had
 17 more leeway than management discretion, control
 18 of their own budgets, to do certain things.

19 **Q.** Looking at this now, knowing what you know, do
 20 you still see the earlier approach to be
 21 a culture of "weak management"?

22 **A.** Well, if you applied that approach and cut and
 23 paste it on to the Horizon era, no, because
 24 there should be more analysis of why shortages
 25 have happened than there was, from 2001,

38

1 any of those.

2 **Q.** Do you recall any follow-up after your email?

3 **A.** No.

4 **Q.** So this is 2009. We've looked at your comments
 5 in 2018 to the lawyer, in relation to the Group
 6 Litigation. They're very similar in response to
 7 the issues with Horizon, lack of knowledge of
 8 issues with Horizon. Was there nothing in that
 9 10-year period, or almost 10-year period, 2009
 10 to 2018, that made you rethink your position?

11 **A.** I think in the background you had the Justice
 12 for Subpostmasters campaign. I wasn't directly
 13 involved in answering anything that came from
 14 that campaign and I'd tend to think that the
 15 people around me in the company were quite
 16 sceptical and dismissive about the things that
 17 were being said, and I can't recall any trend of
 18 anything happening, really, that would cause me
 19 to think that there were significant problems in
 20 the system.

21 **Q.** We know the *Computer Weekly* article, for
 22 example, was published on 11 May 2009, so very
 23 soon after that email exchange?

24 **A.** Yeah.

25 **Q.** Did that not make you rethink the experiences,

40

1 for example, when you were being Contract
2 Manager and had received those complaints about
3 training?

4 **A.** No, because I didn't read it or have any
5 knowledge of it. The only thing that made me
6 rethink about how cases were managed is the
7 information that emerged from the Group
8 Litigation onwards. And I would think back and
9 try and think of specific examples of what
10 I would have done differently, or had I seen any
11 evidence that the Horizon system was flawed and,
12 at all of those points, I wasn't able to
13 identify anything that I could have -- specific
14 examples, historically.

15 **Q.** You had that email exchange in 2009, very
16 shortly before *Computer Weekly*, about a letter
17 from a Member of Parliament having been informed
18 by a reporter.

19 **A.** Mm.

20 **Q.** You then have the *Computer Weekly* article. Is
21 that not something you saw at the time, was
22 brought to your attention that people talked
23 about?

24 **A.** No. No. The first time I heard of the *Computer*
25 *Weekly* article was reading Nick Wallis' account

41

1 sorry, 2008/2009, and Kevin Gilliland was the
2 head of that team and I know that he had
3 concerns about some specific cases where
4 a postmaster had been suspended, and I recall
5 that there was a change to the approach
6 regarding either prosecutions or suspensions
7 around that time, based on a meeting that he'd
8 had with Legal Services and Paula Vennells, who
9 was Network Director at the time.

10 And then I think there was some
11 authorisation process at a reasonably high level
12 before a suspension could happen, you know.

13 **Q.** Thank you very much.

14 Was there a concern that you noticed within
15 the Post Office about shining a light on this is
16 issues in that 2009 period?

17 **A.** No, no.

18 **Q.** I want to return to your interview with Womble
19 Bond Dickinson, so that's POL00006666 and it's
20 page 46 that I'd like to look at. It's the
21 bottom half of page 46. It seems there that
22 you're going through with the solicitor
23 a document, maybe a pleading or a request of
24 some sort, from the claimants; do you recall
25 that?

43

1 of developments online in the last two to three
2 years.

3 **Q.** Did you notice any change in activity within the
4 Post Office, within the various hierarchies,
5 with those who you communicated with, in
6 response to trying to get to the bottom of any
7 problems that were identified?

8 **A.** Well, I know that there was concern within the
9 company about the number of postmasters that
10 were being suspended as a result of bad audits,
11 and there were changes put in place to make sure
12 that these suspensions were authorised at quite
13 a high level in the company. But that didn't
14 tell me that there were inherent problems with
15 the Horizon system. It just told me that there
16 was a general concern about the number of
17 suspensions that were happening, because we were
18 finding it problematic to keep services going in
19 some communities and that was always a strong
20 imperative for the company.

21 **Q.** Who, in particular, do you recall being
22 concerned about the number of suspensions?

23 **A.** Well, at the time I was working in the Agency
24 Development Team -- I'm trying to approximate
25 the years -- I think it was around 2017/18 --

42

1 **A.** Which paragraph?

2 **Q.** If we look at VB, she says "64.9". I'll read
3 that to you. She says:

4 "64.9 to communicate or alternatively not to
5 conceal the extent to which other subpostmasters
6 were experiencing issues relating to Horizon and
7 the generation of discrepancies and alleged
8 shortfalls. So what they want to have here
9 I think is information sharing about postmaster
10 A has got a problem and that should be told to
11 postmaster B or possibly to all the other
12 postmasters."

13 **A.** Mm.

14 **Q.** So there seems to be a request that the Post
15 Office should be communicating with postmasters
16 about problems with other postmasters --

17 **A.** A request from whom?

18 **Q.** Well, exactly. That was my question. Do you
19 recall, it seems to be some sort of document of
20 requests, perhaps from the claimants in the
21 Group Litigation?

22 **A.** No.

23 **Q.** Your answer to that proposal was as follows.
24 You said:

25 "Well first of all there is the issue of

44

1 confidentiality and data protection concerning
 2 other people. Secondly commercially it would
 3 make no sense to do that because that
 4 information could then be used by others as
 5 a smokescreen to defraud the company. The other
 6 point is where we have seen examples of good
 7 practice or bad practice then we would publicise
 8 and do publicise that because we do not want
 9 agents to suffer financial harm so to suggest
 10 that could be an obligation on us I think
 11 commercially it makes no sense at all."

12 So you raise there issues of
 13 confidentiality, data protection, you say it
 14 would be commercially bad, you say it could
 15 encourage fraud. There seem to be a quick list
 16 of reasons not to provide information to
 17 subpostmasters about bugs, errors or defects
 18 within the system. How is it that you gave that
 19 answer?

20 A. I think it just seems to make sense, really --

21 Q. Can you see the problems with that answer?

22 A. -- at the time. In the context of?

23 Q. The lack of information sharing with
 24 subpostmasters about other subpostmasters having
 25 discrepancies and alleged shortfalls?

45

1 years I've read that a lot of people have said
 2 that they were told that they were the only one
 3 experiencing problems with their Horizon system
 4 and, clearly, they weren't. So yeah, it's hard
 5 to reconcile what I now know with what I said
 6 back then.

7 Q. The company, of course, was prosecuting
 8 people --

9 A. Yeah.

10 Q. -- and people were losing their livelihoods.
 11 You were involved in, for example, the debt
 12 recovery policies.

13 A. Yeah.

14 Q. People were affected who were saying that they
 15 had discrepancies or alleged shortfalls caused
 16 by bugs, errors or defects?

17 A. Yeah.

18 Q. I mean, revisiting that position from 2018, not
 19 so long ago, do you see the problem with that
 20 approach?

21 A. I think, looking at it now, I think it was
 22 incumbent on the company to be completely open
 23 and honest about problems with the system at the
 24 point that they were aware of those problems.

25 Q. Where was that mindset of confidentiality, data

47

1 A. Mm, I think that you wouldn't talk to one
 2 postmaster about experiences other postmasters
 3 had had. That doesn't seem to make any sense
 4 for the business to do that.

5 Q. Why wouldn't it make sense for the business?

6 A. Well, it may not be helpful, in terms of dealing
 7 with the complaint that a postmaster had put to
 8 us.

9 Q. Because it wouldn't help the Post Office?

10 A. It wouldn't get to the bottom of the dispute,
 11 would it? If a postmaster A says they had
 12 a problem with their accounts, it wouldn't be
 13 helpful to them or us to publicise other
 14 postmasters that had also had problems with
 15 their accounts. They've still got a discrepancy
 16 in their accounts, haven't they?

17 Q. Was that your view, the view of your department,
 18 the view of the company as a whole?

19 A. It was just response that was put to me at that
 20 particular point in time by Victoria, really,
 21 and it was just a practical objection to sharing
 22 information regarding other postmasters,
 23 I think.

24 Q. Do you now recognise the problems with that?

25 A. Like I -- you know, in the last two or three

46

1 protection, commercial implications? Where was
 2 that coming from?

3 A. That was just my own opinion at that particular
 4 point in time, in reaction to a question that
 5 was being put to me by Victoria, really.

6 Q. Having received, for example, from time to time,
 7 during your time a contract manager, complaints
 8 from subpostmasters, having been involved in
 9 that 2009 correspondence from the journalist,
 10 the complaint to the Member of Parliament, why
 11 do you think it is that you didn't recognise the
 12 importance of information sharing and put up,
 13 quite quickly, those barriers?

14 A. I think it's because, over a long period of
 15 time, you know, I would deal with -- you know,
 16 there was something like 13,000/14,000
 17 postmasters and, as a Contracts Manager, you
 18 would deal with a certain number of those, maybe
 19 1,000, in my part of the South East. And you
 20 would always look at the scale of complaints
 21 compared to the total network size and it didn't
 22 appear to be huge.

23 It was difficult for me, just looking after
 24 1,000 agents, to see that perhaps the problem
 25 was much bigger than I thought it was.

48

1 Q. So you didn't have visibility of the figures
2 around the country?

3 A. No, there was no sort of data sharing of what
4 was going on around the country. I think, at
5 one point, it became apparent that the number of
6 suspensions and terminations had, sort of,
7 increased, compared to a time when there were
8 manual accounts, pre-Horizon. And the narrative
9 in the company was that was because the Horizon
10 system provided us more insight into what was
11 going on in branch and, therefore, audit
12 activity could be targeted with more
13 intelligence and, therefore, you would expect
14 the Post Office to uncover more discrepancies.

15 Q. The identification of the issue with a large
16 number of suspensions, et cetera, is that the
17 time period that you had previously told us
18 about and the discussion, I think you mentioned
19 a number of names that were involved in that, or
20 is this a different period?

21 A. It was during the period of time when I was
22 working for Craig Tuthill and John Breeden was
23 in charge, and Lin Norbury in charge of the
24 Contracts Advisers. And there was some
25 sharing-off information on a, sort of, bimonthly

49

1 Group Litigation regarding the flaws in the
2 software and the bugs.

3 Q. When you were drafting the policies -- we'll
4 look now at the debt policy, debt recovery
5 policy --

6 A. Yeah.

7 Q. -- the ability or potential for there to be
8 bugs, errors or defects in the system, was that
9 ever part of the conversation?

10 A. No. You know, I'll be very clear that the debt
11 recovery policy was quite simple. You know,
12 debts are there to be recovered by the company.
13 And it was quite unusual for me to be asked to
14 get involved in something like that, that was
15 managed elsewhere in Finance and between the
16 Contracts team.

17 And I think the reason I was asked to do it,
18 it was more to do with the process and there
19 were some -- it was a bit clunky, there were
20 problems between the Contracts team and Finance.
21 It wasn't working well. It wasn't anything to
22 do with the real policy of recovering debt, it
23 was just process mapping, really.

24 Q. Can you summarise for us the problem?

25 A. I don't recall what the specific disjoints in the

51

1 basis about the number of suspensions.
2 So that was maybe the period of time,
3 probably '14/'15/'16, sometime around then, and
4 yeah, the -- there was concern in the company
5 about the number of suspensions, and that was
6 roughly around the same time where there had
7 been a sort of policy change, a top-down policy
8 change, regarding who could authorise
9 suspensions on the basis of a bad audit, or for
10 any other reason.

11 Q. Where did you see that drive coming from?

12 A. At the top.

13 Q. What do you mean by "top", sorry?

14 A. At ExCo level.

15 Q. The Executive?

16 A. Yeah.

17 Q. The views that we've seen in those emails about
18 Horizon acting like a calculator, et cetera. Is
19 it fair to say that you held those views when
20 you drafted the various policies that we're
21 going to see, in particular debt recovery
22 policy?

23 A. Yeah, that's fair. You know, my view about the
24 system didn't change until the emergence of, you
25 know, a large amount of information from the

50

1 process or what the tensions were between
2 Finance and the Contracts team. I wasn't told.
3 It was Craig Tuthill, I think, that instructed
4 me to refresh the process. It wasn't policy.
5 It was process mapping. And I had numerous
6 conversations with people in that part of the
7 world, just to agree a better process, a more
8 efficient process.

9 Q. I'm going to bring that document onto the
10 screen. It's POL00113670. This is the 2013
11 version of the policy.

12 A. Yeah.

13 Q. It's called "Operators' In Service Debt", and we
14 see at the bottom of this page you are listed
15 there as "Assurance". If we could scroll down,
16 sorry. There, that's your name there. Why does
17 your name appear there?

18 A. Because I'm the owner of policy and, therefore,
19 didn't get implemented unless I was content with
20 it.

21 Q. I think you said in your witness statement that
22 you drafted this policy or were responsible for
23 drafting it. Did you actually input some of the
24 text or?

25 A. I think a lot of the screwdriver work was

52

1 probably done by one of my team and, therefore,
 2 there were just iterations between me and Ravi,
 3 in terms of developing the approach and the
 4 drafting work. I think he did a lot of the
 5 process mapping but that's about the extent that
 6 my memory will allow.

7 **Q.** Would you have been the most senior member of
 8 the Post Office to have reviewed this before it
 9 was finalised?

10 **A.** No, there were people in that circulate -- if
 11 you scroll up, yeah, there were people in that
 12 circulation list that --

13 **Q.** They're listed as stakeholders. Would they have
 14 reviewed it before it was finalised?

15 **A.** Yeah, they would have been asked to comment on
 16 the process mapping.

17 **Q.** Thank you. If we look at page 3, it sets out
 18 the purpose of the policy.

19 **A.** Yeah.

20 **Q.** It says:
 21 "The purpose of this policy is to clearly
 22 set out the processes Post Office Limited will
 23 follow to recover debt incurred in service by
 24 Operators of all Post Office branches."
 25 If we scroll down to the glossary, it

53

1 background section that I'm particularly
 2 interested in. Is it possible, if we could keep
 3 this on screen and I'm just going to bring up
 4 alongside it a slightly later version of the
 5 same policy. So if we could keep that, perhaps,
 6 on the left-hand side, if that's possible, and
 7 if we could bring up POL00088312.

8 This is a 2017 version. Is that the same
 9 policy but just a later version?

10 **A.** I'm just looking for --

11 **Q.** The earlier version is called "Operators' In
 12 Service Debt" and this one is called
 13 "Postmasters' In Service Debt"?

14 **A.** Yeah, I think it's a later iteration of --

15 **Q.** Thank you. That also has your authorisation in
 16 2017.

17 **A.** Yeah.

18 **Q.** So it looks as though in 2013 you authorised
 19 a policy, you subsequently authorised updates,
 20 and you authorised this one in 2017.

21 **A.** Yeah.

22 **Q.** If we could go to page 3 on the right-hand side,
 23 we should be able to see the bottom half of
 24 page 3. If we could zoom in, in the same way as
 25 we have on the left-hand side, thank you very

55

1 defines "Operator" there, a little bit lower
 2 down on the page. An operator is:
 3 "Any individual, company or partnership
 4 (including subpostmasters and franchisees)
 5 responsible for the operation of any Post Office
 6 branch."

7 **A.** Yeah.

8 **Q.** So this policy, to summarise, it sets out the
 9 processes for the Post Office to follow to
 10 recover debt incurred by --

11 **A.** Postmasters.

12 **Q.** -- amongst other people postmasters.

13 **A.** Yeah, "operator", at that time, was just using
 14 an umbrella term for agents. Now, it's
 15 postmasters on different contract types.

16 **Q.** Thank you. Could we go over the page to page 4,
 17 please. 3.2 says:
 18 "This policy is designed to provide clear
 19 and consistent guidelines and processes for [the
 20 Post Office] to recover transactional and
 21 non-transactional debt incurred whilst in
 22 service by Operators of all Post Office branches
 23 whether they are still in service or have
 24 subsequently resigned."
 25 Then we have "Background". It's the

54

1 much. It's the "Contractual position", if you
 2 could scroll down slightly, thank you.

3 It seems as though they're largely the same,
 4 these two. On the left-hand side, we have:
 5 "From a purely contractual perspective, the
 6 Operator of a Post Office branch is responsible
 7 for ..."

8 Then it has three points. I'm going to come
 9 to each of those.

10 I think the only real difference between 4.1
 11 and 3.1 is the reference to "without delay", on
 12 the right-hand side, "making good without
 13 delay". So on the left-hand side we have the
 14 word "making good" in the bullet points; in the
 15 right-hand side, we don't have them in the
 16 bullet points, but they are in 3.1, but there is
 17 a difference and it seems to be in the time
 18 period in which they had to be made good.

19 Do you see that difference?

20 **A.** Yeah, in the first document, it says "without
 21 delay". In the second document it doesn't say
 22 that.

23 **Q.** I think it's the later document says "without
 24 delay", the earlier one doesn't.

25 **A.** Oh, I see. Right.

56

1 Q. Do you recall a change in the time period, for
 2 example, that things needed to be made good, or?
 3 A. No, because that would have been managed between
 4 finance and the contract team, in terms of the
 5 amount of time that was allowed to make good
 6 losses.
 7 Q. Both of those say, "From a purely contractual
 8 perspective".
 9 A. Mm.
 10 Q. Can you assist us, were all subpostmasters on
 11 the same contract? Were there different
 12 contracts?
 13 A. No, you had what I referred to as the
 14 "traditional" contracts. So that would be
 15 subpostmaster, modified subpostmaster, community
 16 subpostmaster. Then you had the contracts that
 17 emerged as part of the Network Transformation
 18 Programme and they were referred to as
 19 operators. So that was an entirely different
 20 type of contract and there were -- sorry, and
 21 there were lots of variants of those contract
 22 types.
 23 Q. Were these three bullet points intended to
 24 capture all of those different versions of the
 25 contract?

57

1 I think you've really repeated it today, that
 2 subpostmasters could write to their Manager,
 3 Contracts Adviser or even to the Post Office.
 4 A. Mm.
 5 Q. Might that be why there's a reference there to
 6 the contractual perspective, because the reality
 7 was that you could go outside of your contract
 8 and make an approach to somebody?
 9 A. No, I just don't think that was in my mind at
 10 all at that point. As I said, the whole issue
 11 of dialling down losses or writing them off,
 12 that was a long time ago, you know, in any
 13 volume. I didn't see, in 2017/18, that
 14 happening but I wouldn't because I wasn't
 15 managing the Contracts Advisers or Area
 16 Managers. It was something, if it was
 17 happening, it was discrete to me.
 18 Q. To assist us with time periods, do you mean in
 19 the early days, Legacy Horizon, so
 20 2000/2001/2002, et cetera, there was still
 21 that --
 22 A. No, I mean in the era of manual accounts where
 23 postmasters were account managed, had a closer
 24 relationship with Area Managers in the field.
 25 Q. You don't believe that happened during the

59

1 A. Yeah, the latter -- I think the original policy
 2 wasn't developed in the life-cycle of Network
 3 Transformation. So the latter policy would have
 4 been designed to take into account the Network
 5 Transformation contracts.
 6 Q. So am I right to understand that some
 7 subpostmasters would have signed a contract
 8 pre-Network Transformation and be operating
 9 under whatever contract it is they signed
 10 there --
 11 A. Correct.
 12 Q. -- others post, but both would be held to this
 13 policy?
 14 A. Yeah, the policy spanned all postmasters, yeah.
 15 Q. Can you assist us with why the reference there
 16 is "from a purely contractual perspective, the
 17 operator is responsible for"? What do you think
 18 is meant there by "purely contractual
 19 perspective"? It seems to imply that there's,
 20 for example, some discretion over and above what
 21 the contract says?
 22 A. No, I think I was just making it clear that it
 23 was a contractual obligation, not that I thought
 24 it was something happening beyond the contract.
 25 Q. I mean, you've said in your statement, and

58

1 lifetime of Horizon?
 2 A. If it did, I wouldn't have any knowledge of it
 3 because, you know, I was in a more senior role
 4 and I wasn't managing postmasters directly,
 5 except for the time when I was a Contracts
 6 Adviser -- Manager in 2002 to 2004. And, even
 7 at that point, my recollection is that it was
 8 extremely rare to receive these type of requests
 9 from postmasters.
 10 Q. Looking at those bullet points, the first one
 11 is:
 12 "Making good any loss of Post Office cash
 13 and stock without delay."
 14 In fact, so the "without delay" there
 15 appears on the left side.
 16 A. Mm.
 17 Q. There's no real difference there. But the first
 18 one is:
 19 "Any loss of Post Office cash and stock."
 20 The second is:
 21 "Any losses incurred whilst operating under
 22 their respective contractual agreements that
 23 come to light following termination of the
 24 agreement."
 25 A. Mm.

60

1 Q. The third is:
 2 "All losses incurred through their own
 3 negligence, carelessness or error and also for
 4 losses caused by their Post Office assistants."
 5 A. Mm-hm.
 6 Q. So the first bullet point we have there is "any
 7 loss", so the postmaster is responsible for any
 8 loss, and the third one is "all losses save
 9 for", for example, it seems, if it wasn't caused
 10 by their own negligence, carelessness or error.
 11 Can you explain to us why the first of those
 12 reads as though any losses must be paid back,
 13 but the third reads as though there might be
 14 some reasons to excuse a subpostmaster?
 15 A. I think that there was a difference between the
 16 Network Transformation contracts and the
 17 traditional contracts in terms of what the
 18 postmaster's obligations were, and I think there
 19 was a probably, in the Network Transformation
 20 contracts, I think it was the obligations were
 21 probably heavier, from memory -- I can't
 22 remember specifically how -- than what was
 23 placed upon the postmasters who had traditional
 24 contracts. I think there was some tightening of
 25 the drafting.

61

1 respect of the circumstances in which you can,
 2 in fact, recover debt from subpostmasters?
 3 A. If you relied purely on the policy document and
 4 weren't cognisant of which type of contract the
 5 postmaster was on and the circumstances in which
 6 the debt had arisen, yeah, there would be.
 7 Q. Separately, was there any thinking at this time,
 8 I think you've already given this answer, but to
 9 bugs, errors and defects, and how that might fit
 10 into --
 11 A. No.
 12 Q. -- the situation?
 13 A. No.
 14 Q. Just before the break, I'll just take you to the
 15 community subpostmaster contract that's
 16 POL00000246, and it's page 71. So, I mean, we
 17 have various different iterations of this
 18 policy.
 19 A. Yeah.
 20 Q. Perhaps if we go over -- sorry, yes. That's
 21 fine. On page 71, you have there -- this is
 22 under section 8 -- "Responsibility for Post
 23 Office's stock and cash" and at paragraph 12 we
 24 have a heading "Losses".
 25 A. Mm.

63

1 Q. So, in fact, it may have been that the first
 2 bullet point was intended to capture those who
 3 had signed the post-Network Transformation
 4 contract and the third bullet point was intended
 5 to capture those who had signed the original
 6 subpostmaster's contract?
 7 A. It's quite possible but I can't remember
 8 specifically what my thinking was at the time.
 9 Q. Can you see there potential cause for confusion
 10 amongst those who were operating this policy as
 11 to whether they were to take action in respect
 12 of all losses or just those that weren't caused
 13 by their own negligence -- that were caused by
 14 their own negligence, carelessness or error?
 15 A. Well, I think typically the people managing the
 16 whole issue of recovery of losses were either
 17 Finance or the Contracts Advisers, and that was
 18 their sort bread and butter business, really,
 19 part of it, it was recovering debts. And they
 20 would always be mindful of what type of contract
 21 the postmaster was on when doing that, or should
 22 have been.
 23 Q. Looking at this document, though, the policy
 24 document about recovery of debt, can you see
 25 that there could be cause for confusion in

62

1 Q. It says there:
 2 "The subpostmaster is responsible for all
 3 losses caused through his own negligence,
 4 carelessness or error, and also for losses of
 5 all kinds caused by his Assistants.
 6 Deficiencies due to such losses must be made
 7 good without delay."
 8 So does that assist you, that that looks
 9 very much like that third bullet point but not
 10 at all like the first bullet point?
 11 A. Yeah, I think, looking at that, it's -- that
 12 policy spans the sort of more modern Network
 13 Transformation contracts and the traditional
 14 contracts.
 15 Q. Well, it doesn't span both, does it? This is
 16 pre-Network Transformation?
 17 A. It is, yeah.
 18 Q. It has there a provision that refers to
 19 negligence, carelessness or error --
 20 A. It does, yes.
 21 Q. -- and is quite differently worded to that first
 22 bullet point in the policy, isn't it?
 23 A. Yeah, that's what I'm trying to say. I think in
 24 the Network Transformation contracts, I think
 25 the obligations were more onerous upon the

64

1 operator than they were in the traditional
 2 contracts and, therefore, the first and third
 3 bullet points in the policy document attempts to
 4 deal with that.

5 **Q.** Mr Justice Fraser in the *Bates* litigation, in
 6 one of the judgments, he refers to a case where
 7 a subpostmistress received a letter saying that
 8 they were contractually obliged to make good any
 9 losses that occurred during their term in
 10 office, and he remarks that that overstated the
 11 position because, as you can see in 12, it's not
 12 in fact any losses.

13 Do you think that some of those problems
 14 come down to the policy that we've just looked
 15 at and the ambiguity between those three bullet
 16 points.

17 **A.** Yeah, it's possible if someone looked back at
 18 the policy document and wasn't mindful of which
 19 contract the postmaster was on, when they sent
 20 a letter, then there is scope for confusion,
 21 yeah, I agree.

22 **MR BLAKE:** Thank you.

23 Sir, that might be an appropriate time to
 24 take our mid-morning break.

25 **SIR WYN WILLIAMS:** Yeah, sure.

65

1 if there had been a potential breach, material
 2 breach of contract.

3 And then a charge letter would be sent to
 4 the postmaster, setting out the charge, which
 5 could be something like false accounting or
 6 misuse of Post Office funds, and then they would
 7 be -- they would have the option of making
 8 a written representation or have a personal
 9 hearing, often attended with a member of the
 10 National Federation of SubPostmasters, and they
 11 would have the opportunity to present any
 12 exculpatory evidence for those charges.

13 And then, based on that and any further
 14 investigation that was necessary, because of the
 15 outcome of that hearing, then I and other
 16 Contracts Managers would draw up a balance sheet
 17 of the evidence and determine whether there had
 18 been a material breach of contract based on the
 19 balance of probability. And once that decision
 20 had been made and then, if there had been, then,
 21 an evaluation was made as to what would be the
 22 most appropriate outcome for POL and the
 23 postmaster.

24 **Q.** Can you assist us with whether there was some
 25 sort of disclosure process to subpostmasters

67

1 **MR BLAKE:** If we could come back at 11.35.

2 **SIR WYN WILLIAMS:** Yes, that's fine. Thank you.

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

4 **(11.19 am)**

(A short break)

6 **(11.35 am)**

7 **MR BLAKE:** Sir, Mr Inwood, I'm going to move on to
 8 a different topic and that's the resolution of
 9 disputes.

10 You explain in your witness statement that,
 11 as Contracts Manager and as Appeals Manager, you
 12 were involved in disputes regarding alleged
 13 shortfalls and the procedures that they
 14 involved.

15 **A.** Correct.

16 **Q.** Can you assist us, how would evidence be
 17 gathered in respect of that?

18 **A.** So, for example, if an audit had occurred and
 19 there was a discrepancy, significant
 20 discrepancy, in the accounts, then the auditors
 21 would complete a report about what they had
 22 found and then, after the precautionary
 23 suspension of the postmaster, if that was
 24 necessary, that would be sent to me and,
 25 therefore, I would evaluate that report to see

66

1 during that procedure?

2 **A.** The postmaster should be provided with a copy of
 3 the evidence that the Contracts Manager had
 4 received from the auditors or the Security team.
 5 The Security team were not always involved. It
 6 would depend on the circumstances. So they
 7 should receive a copy of the inculpatory
 8 evidence.

9 **Q.** We've heard quite a lot about something called
 10 ARQ data or the audit data obtainable from
 11 Fujitsu itself. Is that something you recall
 12 being provided to postmasters?

13 **A.** I was not aware of that during the period of
 14 time I was a Contracts Manager or after that.

15 **Q.** What kind of period are we talking about, when
 16 you would sit on those hearings?

17 **A.** As a Contracts Manager, it was 2002/03 to the
 18 end of, I think, 2004. There was a period of
 19 time when I was an Appeals Manager but it's
 20 difficult for me to approximate the years during
 21 which that was the case.

22 **Q.** But it would have been after your time --

23 **A.** It would have been after 2005 because, to be
 24 an Appeals Manager, you had to be at a certain
 25 level in the company, senior manager level in

68

1 the company.

2 **Q.** So we'll start with the first level, Contract

3 Manager. You've said that a representative of

4 the National Federation of SubPostmasters could

5 attend or, I think, you also said in your

6 statement that a friend could attend?

7 **A.** Or a friend, yes.

8 **Q.** I just want to take you back to the

9 subpostmaster contract. So that is POL00000246.

10 It's page 93 -- actually, if we could look at 92

11 and 93. Page 92, section 14, seems to govern

12 the appeals procedure, so I think that's the

13 second stage, isn't it?

14 **A.** Yeah.

15 **Q.** If we look at page 93, I don't think this is the

16 first stage, is it? This is a different type of

17 investigation for a criminal offence, or do you

18 understand this to have governed that first

19 stage?

20 **A.** No, I agree with what you just said, yeah.

21 **Q.** I just want to use an analogy though and, if we

22 turn to page 95, there is reference to friends

23 at investigation interviews?

24 **A.** Mm.

25 **Q.** Then if we turn to page 96 at the top there,

69

1 strictest confidence."

2 As I say, this doesn't apply to those

3 hearings but was a similar regime in place for

4 those hearings, in respect of what the friend or

5 assistant could or could not do?

6 **A.** I think that the custom and practice, when I was

7 a Contracts Manager, was that the friend who may

8 also be an officer of the National Federation of

9 SubPostmasters could attend the -- what they

10 referred to as the reasons to urge hearing, and

11 it was the case that the NFSP officer would

12 speak on behalf of the postmaster.

13 And I think that was because a lot of

14 postmasters found that to be quite a difficult

15 meeting and were not able to properly articulate

16 their defence or mitigation to the charges, and

17 I think that was custom and practice through the

18 period of time I was a Contracts Manager.

19 **Q.** If you weren't an officer of the National

20 Federation of SubPostmasters, were you allowed

21 to speak?

22 **A.** I believe it was custom and practice to make

23 some representation.

24 **Q.** So if you were attending as a friend, for

25 example --

71

1 paragraph 19, it says this, in relation to those

2 criminal investigations. It says:

3 "A friend may only attend and listen to

4 questions and answers. He must not interrupt in

5 any way, either by word or signal; if he does

6 interrupt he will be required to leave at once

7 and the interview will proceed without him.

8 Whatever is said at the interview is to be

9 treated as in strictest confidence. The friend

10 may take notes of the interview but he must keep

11 the notes in the strictest confidence. The only

12 communication the friend is entitled to make on

13 behalf of the person who has been questioned

14 will be in the form of a written 'in strictest

15 confidence' statement which may be submitted by

16 the latter, in support of any official appeal

17 which the person questioned may desire to make

18 in connection with the methods followed at the

19 enquiry. No other communication about the

20 interview is allowed (unless made by permission

21 of the Post Office) as it might constitute

22 a breach of the Official Secrets Acts. The

23 questioned officer may, however, if he so

24 desires, communicate the friend's statement to

25 the National Federation of SubPostmasters in

70

1 **A.** Yeah.

2 **Q.** -- were you allowed to say something?

3 **A.** I don't think there was any differentiation at

4 the time between what type of friend you were or

5 whether you was an NFSP officer. It just

6 happened to be the case that was people were

7 represented by officers of the NFSP because they

8 had some considerable experience and training in

9 dealing with these issues.

10 **Q.** Were lawyers allowed to attend?

11 **A.** No.

12 **Q.** Do you know the reason for that at all?

13 **A.** Well, because -- well, I guess if a friend was

14 also a lawyer that wouldn't preclude them from

15 attending but if they were there in a capacity

16 as a lawyer and acting on behalf of their

17 client, that would not be allowed because it was

18 a private matter between the company and the

19 postmaster.

20 **Q.** Were you assisted at that stage 1 decision by

21 lawyers in the Post Office?

22 **A.** No, not as a Contracts Manager, no. No, if

23 there was any criminal investigation into the

24 case, that was dealt with entirely separately in

25 a silo from any action that the Contracts

72

1 Manager would take in the civil case.
 2 **Q.** Thank you. Can we look at POL00088982, please.
 3 If we look over the page, this is a document
 4 drafted by you.
 5 **A.** Mm.
 6 **Q.** Your name is at the bottom of that second page.
 7 Then if we turn back to the first page there's
 8 handwritten "In Confidence and Draft". Am
 9 I right to say you drafted this or this is
 10 a draft that you drafted?
 11 **A.** I drafted this policy, yes.
 12 **Q.** I'm not sure if we have the final version of
 13 this, and you can tell me if you recall that
 14 anything was significantly or substantively
 15 different from the version that we're looking
 16 at. "Background", it says:
 17 "From time to time contracts advisers and
 18 appeals managers will be required to give
 19 consideration to what would be an appropriate
 20 outcome where an agent is found to be culpable
 21 of a serious breach of contract. Typically but
 22 not exclusively these breaches will be in the
 23 form of false accounting and/or misuse of Post
 24 Office funds."
 25 What kind of period was this in operation,

73

1 beyond any reasonable doubt. The threshold was
 2 lower in a civil case.
 3 **Q.** Do you recognise any difficulty, looking at that
 4 now, that test. First of all "guilt"; this
 5 isn't a criminal matter?
 6 **A.** No, it was loose terminology. I think it was
 7 better to say culpability for the charges, yeah.
 8 **Q.** "Balance of all possibilities", it sounds a bit
 9 like a conflation between "balance of
 10 probabilities", which is a civil test, and
 11 "beyond reasonable doubt" or --
 12 **A.** That was not what I had in mind when I was
 13 I drafted it. It was perhaps loose terminology.
 14 **Q.** Do you think that was the test applied by people
 15 who were using this policy?
 16 **A.** If they had followed the policy, yeah.
 17 **Q.** When these kinds of policies were being drafted,
 18 was there any consideration of what impact bugs,
 19 errors or defects in Horizon may have?
 20 **A.** No, the reason that the instructions were given
 21 to me to develop this policy is because the
 22 company was concerned that there weren't a broad
 23 enough array of options to apply, where it had
 24 been proven that there had been a material
 25 breach of contract, and that ties in with the

75

1 do you recall?
 2 **A.** I think the policy was drafted some time around
 3 20 -- let me think -- 2014 onwards.
 4 **Q.** Was there a policy before that?
 5 **A.** There was an approach, yeah. I think there were
 6 historic policies that existed prior to that,
 7 obviously.
 8 **Q.** To what extent did you consider yourself to be
 9 qualified to be drafting this policy?
 10 **A.** Because it was a policy that supported people
 11 within POL dealing with material breaches of
 12 contract or alleged material breaches of
 13 contract and it was done with iterations between
 14 myself and Legal Services.
 15 **Q.** Who in Legal Services do you recall liaising --
 16 **A.** I think the principal person would have been
 17 Jessica Madron.
 18 **Q.** We see there under "Guidance notes", it says:
 19 "In cases where guilt has been proven on the
 20 basis of 'balance of all probabilities' ..."
 21 Do you recall, was that the test that you
 22 applied: guilt on the basis of balance of all
 23 probabilities?
 24 **A.** Yes, whether the charges were proven on the test
 25 of balance of all possibilities, as opposed to

74

1 belief that there were, you know, perhaps too
 2 many suspensions and, you know, outcomes were
 3 problematic for the company in terms of
 4 maintaining continuity of service.
 5 So the policy prescribed additional outcomes
 6 that could have been applied by Contracts
 7 Advisers, for example, a suspended termination,
 8 where it was believed that termination was not
 9 appropriate in the circumstances. So it was
 10 just driven by providing a broader array of
 11 options for Contracts Advisers.
 12 **Q.** So, if we scroll down, we can see there are
 13 aggravating factors and mitigating factors that
 14 might assist in making a decision as to how to
 15 deal with a contract breach and, as you say,
 16 this policy was implemented because there was
 17 a concern that too many people were having their
 18 contracts terminated or suspended?
 19 **A.** No, no, no, I think it was -- the main driver
 20 was that the Contracts Advisers needed to have
 21 a broader array of options in terms of the
 22 outcome of the case, that was the main driver
 23 for the policy.
 24 **Q.** Because, prior to that, the only option would be
 25 to suspend or terminate?

76

1 A. Yeah, it would be binary. Yeah, well,
 2 a precautionary suspension would be a precursor
 3 to this process and then, once this process had
 4 started, then the options were that either the
 5 postmaster would be reinstated or that the
 6 contract would be summarily terminated.
 7 Q. They needed, aggravating, mitigating factors,
 8 more options; was that not driven by the fact
 9 that they were experiencing a high level of
 10 terminations?
 11 A. I think there was a background concern in the
 12 company that there were too many suspensions,
 13 too many cases where we were losing Post Office
 14 services in some communities and not being able
 15 to maintain those after the fact of termination.
 16 Q. You say this was 2013, did you say, or --
 17 A. I think it was around 2014, perhaps.
 18 Q. So a fair amount of time after, for example,
 19 that *Computer Weekly* article that we've talked
 20 about or the correspondence from the journalist
 21 to the Member of Parliament about complaints
 22 about --
 23 A. Yeah, I don't believe there was a nexus between
 24 the two.
 25 Q. No, and do you think there should have been

77

1 Q. What exactly did that involve?
 2 A. Well, the purpose of the appeal was to rehear
 3 the case, so looking at any inculpatory and
 4 exculpatory evidence and then examining both
 5 and, if necessary, conducting a further
 6 investigation into the facts internally, prior
 7 to reaching a conclusion.
 8 Q. In terms of, say, audit data, do you think you
 9 were capable of properly understanding audit
 10 data and obtaining the right information from,
 11 for example, Fujitsu, if required?
 12 A. I think the audit report would be taken at face
 13 value by any Appeals Manager.
 14 Q. Was that because the Appeals Manager didn't have
 15 the right skillset to analyse those kinds of
 16 things?
 17 A. I don't think they would have been able to
 18 analyse the data but, at that point in time, it
 19 wouldn't have entered my mind or any Appeals
 20 Manager, I don't believe, to test whether the
 21 discrepancy had been caused by failures in the
 22 system.
 23 Q. If a subpostmaster had said that losses were
 24 arising because of a software error, what would
 25 you be able to do as part of your investigation

79

1 a nexus between the two, in that bugs, errors or
 2 defects in Horizon might have been something to
 3 consider during this --
 4 A. Yeah, with hindsight, I think that, as part of
 5 the whole process around suspension, dealing
 6 with alleged material breaches of contract, as
 7 I said earlier, I think there should have been
 8 a process in place where the possibility of
 9 a discrepancy being caused by software errors,
 10 bugs, should have been ruled out as a possible
 11 cause prior to contractual action being taken.
 12 Q. I'm going -- sorry.
 13 A. I can see why it would be necessary to issue
 14 a precautionary suspension upon the advent of
 15 a significant discrepancy in a postmaster's
 16 accounts. But, in that period of suspension,
 17 I think there should have been more diligence by
 18 the company in flushing out any possible IT
 19 causes.
 20 Q. Moving to appeals, you said you were an Appeals
 21 Manager?
 22 A. I was, yes.
 23 Q. In your statement, you referred to conducting
 24 your own investigation as part of that process?
 25 A. Mm.

78

1 to get to the bottom of that?
 2 A. Well, that would be raised internally and I'd
 3 have to investigate how to determine whether
 4 that was the case or not. I can't remember
 5 a case when I was an Appeals Manager where that
 6 was the -- was raised with me internally, but
 7 the number of appeals you would hear were very
 8 small. You know, if you heard one a year, you
 9 know, that would be normal. There was quite
 10 a large panel of appeals managers. So it was
 11 difficult to get a sort of holistic view about
 12 whether that was being raised a lot at the
 13 appeals stage.
 14 Q. You've said that at the first stage you weren't
 15 assisted by lawyers. At the appeals stage, was
 16 there legal involvement at all?
 17 A. No, no.
 18 Q. If I could go back to the contract, so that's
 19 POL00000246, page 92, where it addresses the
 20 appeals procedure.
 21 If we could look at the bottom of page 92,
 22 please, there's a reference there to appeals and
 23 then it says, "Approaches to persons outside the
 24 Post Office", paragraph 6. It says:
 25 "Until the subpostmaster has exercised his

80

1 final right of appeal, he should not ask persons
 2 outside the Post Office to take up the case on
 3 his behalf although this does not prevent
 4 a subpostmaster from obtaining such advice and
 5 support from the NFSP or any other outside
 6 person as may help him to present his case
 7 effectively. The subpostmaster should not
 8 detain Post Office papers or allow them out of
 9 his custody for the purpose of such consultation
 10 without the permission of the Retail Network
 11 Manager."

12 Can you assist us with the purpose of that
 13 provision?

14 A. I think the view internally was that, at that
 15 stage, it was purely a private contractual
 16 dispute between us and the postmaster and that
 17 there was a process internally to manage that.
 18 Once that process had exhausted, of course, it
 19 would have been open for the postmaster to take
 20 whatever course of action they thought was
 21 appropriate, if they felt that the outcome of
 22 the case was unsafe or unfair.

23 Q. Who is it preventing a subpostmaster from making
 24 contact with?

25 A. Well, anyone, anyone outside of the company,

81

1 Q. In terms of your personal experience and
 2 personal knowledge, you're only aware of one?

3 A. I'm only -- I can only recall one that would
 4 have happened in, like, a three-year period but
 5 I can't remember how many terminations that
 6 I would have been involved in over that period.

7 Q. That's when you were the Contracts Manager.
 8 What about when you were --

9 A. Contracts Manager, yeah.

10 Q. -- sitting on the appeals? Did you ever
 11 overturn an appeal?

12 A. No.

13 Q. I'm going to move on to --

14 A. I think you meant uphold an appeal?

15 Q. Yes. Sorry.

16 A. No.

17 Q. Thank you. I'm going to move on to what happens
 18 when you've been terminated, when your contract
 19 has been terminated. Can we look at
 20 POL00075610, please. This is a 2009 policy
 21 where you are the author?

22 A. Yes.

23 Q. You're named as the author. Do you recall
 24 writing this or being responsible for it?

25 A. Yeah, I've got some recollection of, you know,

83

1 really.

2 Q. We discussed earlier the problems involved with
 3 the inability for subpostmasters to find out
 4 about similar problems that other subpostmasters
 5 were experiencing.

6 A. Yeah.

7 Q. Do you see this provision as causing any issues
 8 in that regard?

9 A. Well, it may or would make them think that, you
 10 know, they were having to deal with this in
 11 a sort of silo, almost, and that they weren't
 12 able to openly discuss the circumstances of the
 13 case with other people or share information with
 14 other people.

15 Q. Do you recall any cases that you were involved
 16 in that were overturned on appeal?

17 A. I think when I was a Contracts Manager there was
 18 one case that was heard by Lin Norbury, who was
 19 an Appeals Manager at the time, that was
 20 overturned.

21 Q. So that's one case in a two/three-year period?

22 A. In a two or three-year period. I think there
 23 was some information internally that said,
 24 I think, around 10 per cent of appeals were
 25 upheld, you know, that --

82

1 looking at that document now, yeah. Yeah.

2 Q. Do you think you wrote it?

3 A. Yeah, I would have authored that approach, yeah,
 4 yeah. It's got my name on it, yeah.

5 Q. If we look at the bottom of the page it explains
 6 what the change is. It says:

7 "For agents who have had their contracts
 8 summarily terminated by Post Office Limited, or
 9 who, in our opinion, have resigned to avoid
 10 termination, it is important that we are open
 11 with them in communicating the possible outcome
 12 of that decision in respect of what type of Post
 13 Office operating model, if any, we determine is
 14 appropriate in the locality."

15 A. Yeah.

16 Q. "One of these outcomes may be the deployment of
 17 a different operating model, eg Post Office
 18 essentials, to that currently used."

19 It says on that final paragraph on the
 20 screen:

21 "It is important to note here that
 22 subpostmasters **do not** have any right of
 23 assignment of their Post Office business, so any
 24 enquiries in that respect should be managed
 25 using the normal reactive lines", et cetera.

84

1 Can you assist us with what this all means?
 2 **A.** This is in the context of, like, a set piece
 3 business transformation programme where the
 4 business had developed a different type of Post
 5 Office operating model. I think the document
 6 refers to Post Office essentials, which was
 7 a forerunner of the local Post Office model that
 8 was implemented as part of the Network
 9 Transformation Programme.

10 So the purpose of the document was to say
 11 that, in the event of termination or resignation
 12 to avoid termination, we need to be open with
 13 the outgoing postmaster that it may not be the
 14 case that a traditional contract -- a Post
 15 Office with a traditional contract, is deployed
 16 in that location.

17 Clearly, an outgoing postmaster would be
 18 perhaps advertising their retail business for
 19 sale with the concession of a Post Office within
 20 it. So it was necessary for them to understand
 21 what type of post office, so that they could
 22 inform any potential buyer.

23 **Q.** So might it be that a subpostmaster's contract
 24 is terminated?

25 **A.** Mm.

85

1 post office is less sellable than it perhaps was
 2 before their termination.

3 **A.** Yeah, that's quite possible, yeah.

4 **Q.** Thank you. I'm going to look at a few other
 5 policies. I'll take them quite quickly. They
 6 address issues such as suspension and contract
 7 breach, for example.

8 Can we look at POL00005933. This is a 2012
 9 policy, "Precautionary Suspension Policy".
 10 I think you've mentioned before precautionary
 11 suspension?

12 **A.** Mm.

13 **Q.** Can you briefly summarise for us what
 14 precautionary suspension was?

15 **A.** Well, that would normally be where there had
 16 been a bad audit with a significant discrepancy,
 17 and there would need to be a process following
 18 that. So a precautionary suspension may be the
 19 most appropriate thing to do at the time.

20 **Q.** We see there you're the owner of that particular
 21 policy?

22 **A.** That's correct.

23 **Q.** Can we turn to page 3, please. It's 3.3. It
 24 says there:

25 "[The Post Office] may consider it to be in

87

1 **Q.** They're then left with a post office and they
 2 then need to find another subpostmaster, sell
 3 it, et cetera, and this document is telling them
 4 or is outlining the position that actually they
 5 might be left with something --

6 **A.** Something different to what was there, yeah.

7 **Q.** Typically something less than what was there?
 8 I mean, Post Office essentials sounds perhaps
 9 smaller, or --

10 **A.** I think the remuneration aspect was different in
 11 Post Office essentials because it was on a fully
 12 variable basis so, on a traditional contract,
 13 the subpostmaster would receive a fixed payment
 14 plus a variable payment. On the more modern
 15 operating models, it was on a fully variable
 16 basis. It's quite an important distinction if
 17 you're thinking about buying a business that has
 18 a post office in it.

19 **Q.** So potentially less profitable?

20 **A.** Potentially, yeah.

21 **Q.** If we are thinking about implications for
 22 subpostmasters once their contract has been
 23 terminated, are we to read into this document
 24 that not only would they lose their contract but
 25 they might suffer financial harm because their

86

1 its interests to spend the Operator of a Post
 2 Office branch if it deems there is a risk to its
 3 brand and reputation, cash or stock or the
 4 interests of our customers."

5 3.13, over the page to page 4, says:

6 "During the period of any suspension [the
 7 Post Office] will cease all payments to the
 8 suspended Operator."

9 So am I to understand that a subpostmaster
 10 may be suspended on a precautionary basis --

11 **A.** Mm.

12 **Q.** -- and the result of that is that the Post
 13 Office will stop paying the subpostmaster?

14 **A.** That's correct. What would happen in that case
 15 is that we would seek to appoint a temporary
 16 postmaster to operate from the premises. He
 17 would negotiate some payment with the suspended
 18 agent for consideration for using the premises,
 19 and then the remuneration would go to the
 20 temporary postmaster.

21 **Q.** Thank you. Another policy, POL00086116. This
 22 is the "Guiding principles for suspension". So
 23 that's substantive suspension, is it, rather
 24 than precautionary suspension?

25 **A.** I think there was only precautionary suspension,

88

1 yes.

2 **Q.** Thank you. Were you involved in the drafting of

3 this document?

4 **A.** What was the date of the --

5 **Q.** I don't think this document is dated. If we can

6 zoom out, please?

7 **THE WITNESS:** Okay, is it possible to have

8 a five-minute comfort break?

9 **MR BLAKE:** Yes, absolutely.

10 **THE WITNESS:** Okay, thanks.

11 **MR BLAKE:** Sir, can we break until 12.15? We have

12 plenty of time today.

13 **THE WITNESS:** Thank you.

14 (12.07 pm)

15 (A short break)

16 (12.15 pm)

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

18 Mr Inwood, one final policy before I move on

19 to two very small discrete issues. It is

20 POL00088475. This is a 2014 policy with you

21 named as the owner and it's entitled "Contract

22 Breach". Can you just briefly assist us with

23 how this policy fits in with the various

24 policies that we've already seen.

25 **A.** I think this was probably the most recent

89

1 of different documents but perhaps I'll just ask

2 you the open question as to whether you've

3 reconsidered that position since you've seen

4 documents?

5 **A.** I can recall one particular case, I think, when

6 I was a Contracts Manager, 2003/2004. I think

7 it was some contact from Jarnail Singh, who was

8 involved in the criminal prosecutions team. But

9 it was only that. It was just to inform me of

10 progress and to find out progress with the

11 contractual case. There may be others that

12 I wasn't able to recall when I completed the

13 witness statement, of course.

14 **Q.** Did you ever give evidence in criminal

15 proceedings?

16 **A.** Only when I was a branch manager in the Crown

17 Office estate and a case of a POL employee, and

18 I think I was called to give evidence in one

19 other case as an expert witness. I think it was

20 a postmaster, something that I wasn't directly

21 involved in.

22 **Q.** When you say an expert witness, in what way were

23 you an expert witness?

24 **A.** That can provide an insight into branch

25 accounting procedures. It was to do with

91

1 iteration of the policy and I think it was at

2 the request of Angela van den Bogerd, she was

3 the sponsor of this work. So it was just

4 something that I worked up with Legal Services,

5 really, that was deployed into the contracts

6 community.

7 **Q.** Thank you. At page 2 it sets out at the very

8 top the purpose; does that assist you in its

9 purpose?

10 **A.** Yes.

11 **Q.** This policy and the previous policies that we've

12 seen today, am I right in saying that there was

13 nothing in those policies about how to deal with

14 situations where there are bugs, errors or

15 defects in the system?

16 **A.** No.

17 **Q.** Thank you. I'm going to move on to a different

18 topic and that's involvement in criminal and

19 civil proceedings. I think you said in your

20 statement that it was rare to receive contact

21 from lawyers and that you played no part in

22 criminal prosecutions and don't have

23 recollection of civil cases.

24 **A.** Criminal cases.

25 **Q.** Of criminal cases. Now, I can show you a number

90

1 an issue of something that was known as British

2 Excursionary Document and they were being issued

3 inappropriately to members of the public. So

4 I think the court just needed to know what the

5 correct procedure was, in terms of validating

6 a person's identification.

7 **Q.** Was the Post Office a party to that case?

8 **A.** I can't remember if they were the prosecuting

9 authority, no.

10 **Q.** Because you've described yourself as an expert,

11 did you know the difference between an expert

12 witness and somebody who isn't an expert

13 witness?

14 **A.** Well, someone who isn't an expert witness

15 wouldn't know a great deal about the subject and

16 I did know a great deal about the subject. So

17 that's why I described myself in that way.

18 **Q.** Were you ever told by anybody in the Post Office

19 Legal team, for example, about the duties to

20 a court that an expert witness owes?

21 **A.** No, I don't think there was any discussion.

22 I think it was the Post Office Investigation

23 team that had asked me to appear. It was an odd

24 one because it just wasn't a case I'd been

25 directly involved in.

92

1 Q. Do you recall who in the Post Office
2 Investigation team?
3 A. No, it was a-- that was a long time ago when
4 I was a branch manager, so I think it was
5 probably some time in the 1990s.
6 Q. Thank you. I'll take you to a few documents
7 very quickly. Can we look at POL00086582,
8 please. This is a discussion with somebody
9 called Victoria Brooks, who was an associate at
10 Bond Pearce, about a case that involved a branch
11 called Newcastleton branch. Halfway down the
12 page, she says there:
13 "You have seen my emails with Roderic and
14 Paul Inwood regarding the interview process,
15 where this comes from and whether it is
16 necessary. Paul has said that these points
17 would be picked up as part of a review that is
18 imminent, so for now I have proceeded on the
19 basis that [the Post Office] wants to allow the
20 opportunity for an interview to take place."
21 Can you assist us, does this assist you with
22 the types of occasion when you would come into
23 contact with lawyers?
24 A. Well, I was working with Legal Services very
25 closely all of the time, so it wasn't something

93

1 a temporary postmaster. And I think there was
2 concerns about the fact that she felt that she
3 was entitled to such a payment.
4 Q. Would you be consulted by the Legal team about
5 contractual matters involving subpostmasters?
6 A. From time to time, yeah, in the context of
7 a civil case, yeah.
8 Q. Do you recall Mandy Talbot?
9 A. I'm familiar with the name and I think perhaps
10 she was involved in criminal prosecutions side.
11 I'm not entirely sure.
12 Q. If we look at the email, it has, on the next
13 page "Mandy Talbot, Dispute Resolution, Company
14 Secretary's Office". Does that assist you?
15 A. Err --
16 Q. Do you recall, for example, how senior she was,
17 or how senior you understood her to be?
18 A. I think she was probably around the level of
19 principal lawyer, around the same level as
20 Jessica Madron.
21 Q. What did you understand by the same principal
22 lawyer?
23 A. Well, not a paralegal, you know, someone who had
24 direct reports, you know, solicitor working for
25 them, or some -- you know, job titles tend to be

95

1 that was odd for me to have emails from Legal
2 Services about individual cases.
3 Q. Can we, please, also have a look at POL00072146,
4 the second page here. You're copied into
5 an email from Mandy Talbot and it's about the
6 Marine Drive Post Office, that's a Post Office
7 that was previously run by Lee Castleton, and
8 she says about halfway down the page:
9 "Given the problems we had with Castleton
10 I would have thought that [the Post Office]
11 would be happy if a prospective permanent
12 postmaster had come along? Can the BDM or the
13 Contracts Manager for the relevant part of the
14 country advise whether or not she ever applied
15 for the position at Marine Drive or at another
16 branch and if so what the response was."
17 Does this assist you in recalling what if
18 any involvement you had with the legal case
19 against Lee Castleton or what followed that
20 case?
21 A. No, I think it was -- this was an issue around
22 a temporary postmaster and there was some, when
23 I read this earlier there was some issue around
24 whether they would receive a termination
25 payment, which clearly wasn't appropriate for

94

1 determined by whether you had direct reports or
2 not.
3 Q. Direct reports to who, sorry?
4 A. Into them.
5 Q. Yes.
6 A. So she may have had a solicitor working for her
7 or a paralegal.
8 Q. In your understanding of that Legal team,
9 looking at this or recalling from this
10 discussion about the *Lee Castleton* case, can you
11 give us your understanding of whether she was
12 a case worker or something more significant?
13 A. I can't recall, sorry.
14 Q. Can we look at POL00041427, please, page 2.
15 An email from yourself to Jessica Madron and
16 Rodric Williams and it says, if we could scroll
17 down:
18 "We'll need your help with this case please
19 as there is an indication that it may be heading
20 towards litigation."
21 Does that assist you at all in your
22 involvement in litigation against subpostmasters
23 and the role that you had?
24 A. I think it would be very infrequent if at all.
25 As I said to you earlier, the whole management

96

1 of the civil aspect of a dispute was sort of in
 2 a silo from any criminal prosecution. I don't
 3 believe anyone would come to me for advice about
 4 how to manage a criminal prosecution but would
 5 come to me for advice about how to manage the
 6 civil aspect of the case.
 7 **Q.** The Inquiry has heard evidence suggesting that
 8 actions taken by Contracts Managers, for
 9 example, in some way, formed part of
 10 a prosecution case against a subpostmaster.
 11 Were you aware of the actions that you were
 12 taking as Contracts Manager?
 13 **A.** No, it was the opposite to that. As I said
 14 earlier, I don't think there was any nexus
 15 between the two. I was trained to treat the
 16 civil aspect of a case entirely separately from
 17 the criminal aspect of the case. That's because
 18 the burden of proof in the two is completely
 19 different. And, as I said earlier, it was very
 20 rare for me to -- in the context of the whole
 21 number of cases that would cross my desk, would
 22 be to hear about the criminal aspect of a case,
 23 as opposed to the civil aspect.
 24 **Q.** Were you aware that information that you
 25 gathered, for example, might subsequently be
 97

1 Sight.
 2 **Q.** Perhaps I can show you POL00022167. If we go to
 3 the final page here, page 4 has your name there,
 4 2014?
 5 **A.** Yeah, it does, yeah.
 6 **Q.** If we look at the first page it explains what it
 7 is. "Second Sight Mediation Briefing Report".
 8 Do you remember writing this report?
 9 **A.** No.
 10 **Q.** It may be difficult to say why you don't
 11 remember it but it wasn't so long ago, 2014?
 12 **A.** Well, it's nearly 10 years ago.
 13 **Q.** Is there a reason why issues relating to Second
 14 Sight you I can't recall, certainly haven't
 15 detailed in your witness statement?
 16 **A.** It was something I was aware of and it's clearly
 17 something I've helped draft a response to, but
 18 it's not something that really stuck in the
 19 mind, really.
 20 **Q.** Perhaps if we could look at POL00021853. It's
 21 an email of 27 August 2014. You're listed there
 22 as a copy recipient.
 23 **A.** Mm.
 24 **Q.** If we could scroll down a little bit, thank you
 25 very much. It's an email chain commenting on
 99

1 used in a criminal prosecution?
 2 **A.** I'm not -- I can't think of any examples where
 3 it was because, in the context of a civil aspect
 4 of the case, I can't recall being asked to
 5 provide any evidence by someone --
 6 **Q.** Would you have known if information that you
 7 gathered as part of your processes was
 8 subsequently used in a --
 9 **A.** Not necessarily, you know, because once the case
 10 had been put to bed, you know, the paperwork
 11 would be retained for six or seven years in the
 12 ex-postmaster's papers and I guess it would have
 13 been possible for someone looking at the
 14 criminal prosecution to call those papers in and
 15 look at them but I wouldn't have been alerted to
 16 that fact, had it happened.
 17 **Q.** The final topic I have is Second Sight. You say
 18 in your statement that you had no involvement
 19 with Second Sight.
 20 **A.** Yeah.
 21 **Q.** You've subsequently seen some documentation.
 22 Does that assist you at all?
 23 **A.** I've seen documentation where I was copied in to
 24 either an email or a document that was being
 25 developed to inform the response to Second
 98

1 the Second Sight Part Two report. Why might you
 2 have been included in that email distribution
 3 list?
 4 **A.** Why would I have been?
 5 **Q.** Yes.
 6 **A.** Because someone believed I needed to see it. If
 7 they were asking for a specific comment, I think
 8 that would be different.
 9 **Q.** Do you know why you in your particular role at
 10 that particular time may have been included in
 11 the distribution list. Looking at the names
 12 there, for example, what is it that you might
 13 have added or why you might have needed to see
 14 that?
 15 **A.** I think it was -- as I said earlier, it was
 16 quite common for me to be copied in to email
 17 chains for anything pertaining to postmasters,
 18 as a sort of comfort blanket, you know, in case
 19 I could read it and think of something where it
 20 added value to the conversation in the email.
 21 **Q.** Do you recall reading the Second Sight Part Two
 22 report?
 23 **A.** No.
 24 **Q.** There are other emails, two other emails, I can
 25 give the references, I won't bring them up on
 100

1 screen: POL00021883 and POL00022240. Again,
 2 you're part of a small distribution list --
 3 **A.** Yeah.
 4 **Q.** -- that is addressing the Second Sight Part Two
 5 report?
 6 **A.** Mm.
 7 **Q.** Is it -- it's not something that you recall
 8 discussing with anybody at the time?
 9 **A.** Not really, no. Not at all.
 10 **Q.** I mean, looking at the names, were they people
 11 who you had regular conversations with?
 12 **A.** The whole Second Sight thing, I think it was
 13 intended to be managed in a silo by Legal
 14 Services. Obviously, I had been copied in to
 15 email chains but it's something that I could add
 16 very little value to. So I didn't take a huge
 17 interest in what was going on.
 18 **Q.** Who in particular? You say Legal Services.
 19 **A.** I think the General Counsel, Susan Crichton, who
 20 I think was instructed to appoint Second Sight.
 21 Generally, some fairly senior lawyers were
 22 involved in that.
 23 **Q.** The Second Sight report contained some aspects
 24 that were critical about the Horizon system.
 25 **A.** It did.

101

1 leaves the company quite rapidly, clearly there
 2 is a reason for that.
 3 **Q.** Were there any discussions you had in that
 4 regard?
 5 **A.** No, that wouldn't have been at my level. I'm
 6 referring to anecdotes within the organisation
 7 that I overheard.
 8 **Q.** You've said that there was unhappiness about
 9 that Second Sight report?
 10 **A.** Mm.
 11 **Q.** Was that from her or directed towards her?
 12 **A.** I think it was the latter.
 13 **Q.** Who would be directing it towards her?
 14 **A.** Probably people at ExCo level.
 15 **Q.** Can you assist us with that?
 16 **A.** I think it may have been Paula Vennells.
 17 **Q.** Is that through any particular knowledge, any
 18 particular discussions with anybody? How is it
 19 that you reached that conclusion?
 20 **A.** Overhearing anecdotes and conversations
 21 internally, some time after the fact.
 22 **Q.** Can you give us an approximate time for those?
 23 **A.** Well, from -- it's difficult to approximate
 24 when.
 25 **Q.** We know you left in 2018, so presumably it was

103

1 **Q.** This is 2014. We started today with that 2018
 2 interview with the solicitors where, you'll
 3 recall, Horizon's a calculator, no problems,
 4 et cetera, et cetera?
 5 **A.** Mm.
 6 **Q.** Is it slightly strange that it didn't feature
 7 more prominently in discussions with you and
 8 those individuals?
 9 **A.** I think there was a narrative that was beginning
 10 to develop in the company that was quite
 11 dismissive and unhappy with some of the findings
 12 that the Second Sight had arrived at and it's
 13 not really what they wanted.
 14 **Q.** Who, in particular?
 15 **A.** I think that, around that point, the General
 16 Counsel left the company quite quickly, Susan
 17 Crichton.
 18 **Q.** Other than what you've read in the media
 19 subsequently, is there anything that you knew at
 20 that time or know now as to the reasons for her
 21 departure?
 22 **A.** I think internally there was a -- sometime
 23 after, there was a feeling that she felt that
 24 she was being blamed for the developments with
 25 Second Sight. I mean, when General Counsel

102

1 in between 2014 and 2018?
 2 **A.** Correct.
 3 **MR BLAKE:** Thank you.
 4 Sir, I don't have any further questions.
 5 I know Mr Stein has a small number of questions.
 6 Do you, sir, have any questions before Mr Stein?
 7 **SIR WYN WILLIAMS:** Can you hear me, Mr Blake?
 8 **MR BLAKE:** I can, yes.
 9 **SIR WYN WILLIAMS:** Fine, because there's a glitch on
 10 the IT on my side of this. I can't mute or
 11 unmute myself. Anyway, I will remain on unmute.
 12 I haven't got any questions, no, thank you.
 13 **MR BLAKE:** Thank you, sir. Mr Stein?
 14 **Questioned by MR STEIN**
 15 **MR STEIN:** Mr Inwood, my name is Sam Stein
 16 I represent a large number of subpostmasters and
 17 subpostmistresses.
 18 Just that last point, you've been discussing
 19 with Mr Blake about Second Sight and the Second
 20 Sight report. Your answer to him a few minutes
 21 ago was that, in agreement with him, was that
 22 the Second Sight report raised concerns, and
 23 your answer to him was "It did".
 24 Now, help us understand a little bit more
 25 about your evidence about this.

104

1 A. Mm.

2 Q. You were aware of the contents of the Second
3 Sight report when it came out?

4 A. I don't believe that I ever read it.

5 Q. So is this in the same way that you've discussed
6 with Mr Blake the fact that there was discussion
7 within the company about such things?

8 A. There was corridor talk --

9 Q. Corridor talk?

10 A. -- around the fact that the company were not too
11 happy with the way it was going.

12 Q. Well, the Second Sight report did set out that
13 there had been defects and difficulties within
14 the Horizon system, that those had been noted,
15 and that there were problems, to a certain
16 extent, based upon the information they had at
17 the time. So the Second Sight report seems to
18 have been discussed amongst people in the
19 corridors, as you say, with knowledge that it
20 was showing some defects in the system; is that
21 fair?

22 A. I believe so, yeah.

23 Q. Right. The reason why I ask you that is that at
24 paragraph 98 of your statement -- and, sir, the
25 statement is WITN05780100, paragraph 98, page 17

105

1 the Horizon system.

2 Q. Well, let's read onwards.

3 "That aside I was not aware of any concerns
4 regarding the robustness of the Horizon system.
5 I had used the system myself on occasions, over
6 a long period of time, and it had appeared to
7 work well. I had not seen any evidence that it
8 was not working well. I had heard of a campaign
9 by the Justice for Subpostmasters group, however
10 we were assured internally that the system was
11 sound."

12 A. Mm.

13 Q. Well, you had had concerns brought to your
14 attention in corridor discussions --

15 A. Well, they weren't brought --

16 Q. -- relayed in relation to and in discussion in
17 relation to --

18 A. Yeah, they weren't --

19 Q. -- the second Sight report?

20 A. Yeah, but I'm referring to anecdotes internally
21 regarding some disquiet about Second Sight,
22 generally. I'd not uncovered any specific
23 examples that demonstrated to me that there were
24 flaws in the system.

25 Q. Well, let's just nail this down. Why did you

107

1 of 28 -- that you talk about, during the final
2 year of your service:

3 "... I had heard that it was possible for
4 Fujitsu engineers to gain 'backdoor' access into
5 the system without the knowledge of
6 subpostmasters."

7 A. Mm.

8 Q. You then go on to say:

9 "That did give me some cause for concern as
10 I had previously heard a rebuttal to this
11 internally."

12 A. Mm.

13 Q. Next sentence:

14 "That aside I was not aware of any concerns
15 regarding the robustness of the Horizon system."
16 Now, your last year of service, unless I've
17 got this wrong, was 2018; is that right?

18 A. Correct.

19 Q. Okay. So the sentence there that says, "That
20 aside I was not aware of any concerns regarding
21 the robustness of the Horizon system", is not
22 true, is it?

23 A. Not from postmasters. When I completed that
24 statement I was thinking in terms of specific
25 examples from postmasters, regarding flaws in

106

1 say at paragraph 98 that you were not aware of
2 any concerns regarding the robustness of the
3 Horizon system?

4 A. Yeah, well --

5 Q. When, in fact, you knew, going back in time to
6 the Second Sight report, in corridor
7 discussions, that it was raising concerns?

8 A. I think people were being dismissive about the
9 findings of Second Sight and narrative
10 internally was that, you know, these are
11 forensic accountants not lawyers. How could
12 they have concerns with regards to the fairness
13 of the contracts? You know, I'm talking -- in
14 the statement I'm talking about the fact that
15 I wasn't aware that there were specific examples
16 brought to my attention directly regarding the
17 integrity of the system.

18 Q. Well, Mr Inwood, what it says, "I was not aware
19 of any concerns" --

20 A. Yeah, I understand of that.

21 Q. -- when concerns are being raised.

22 A. Well, let me elaborate --

23 Q. Well, why didn't you actually get it right in
24 your statement and actually say "I was aware of
25 problems in the Second Sight Report but, in

108

1 fact, I was told by X or Y to ignore it"?
 2 A. Well, I've made it clear to you now.
 3 Q. You've also mentioned in your evidence about --
 4 you said something about the Tier 1 helpline --
 5 A. Mm.
 6 Q. -- and you described it in this way, that -- you
 7 were discussing with Mr Blake the fact that the
 8 helpline didn't seem to have much by way of
 9 operational discretion and you spoke about
 10 sticking to scripts.
 11 A. Mm.
 12 Q. Okay. Now, help us, please, understand, how
 13 many tiers operated in the helpline?
 14 A. I don't know. I wasn't directly involved in
 15 that area of the business.
 16 Q. Well, we know there's Tier 1, that seems to
 17 suppose there's more than one tier?
 18 A. Yeah, but you asked me how many and I'm not
 19 aware of that.
 20 Q. Well, all right, what did the other tiers, other
 21 than Tier 1, do?
 22 A. I don't know. I wasn't directly involved in
 23 that part of the business. Refer -- Tier 1
 24 would refer issues that they could not deal
 25 with --

109

1 that particular sentence is being written down
 2 perhaps as it's said conversationally, then your
 3 answer:
 4 "I agree entirely and if we did do that it
 5 would be entirely inconsistent with our values
 6 as an organisation and I do not believe that any
 7 individual or individuals would do that in this
 8 organisation."
 9 A. Mm.
 10 Q. Okay. So help us understand what you're saying
 11 here. Are you saying there that you felt that
 12 the organisational values were not to keep back
 13 or hold back information about the operation of
 14 the Horizon system errors, bugs and problems?
 15 A. I think it -- generally the values of the
 16 organisation would be to be open, transparent
 17 and honest at that point in time.
 18 Q. What point in time are you talking about?
 19 A. At the point in time that I made that statement,
 20 which is 2018 --
 21 Q. What the year before? Completely dishonest and
 22 wouldn't trust them an inch?
 23 A. No, at that point in time and before that.
 24 Q. So you're saying, generally, that's your view of
 25 the system?

111

1 Q. To?
 2 A. -- up the chain of command to Tier 2, and
 3 beyond. If there was a beyond.
 4 Q. Right. So you didn't have any information
 5 about, what, maybe Tier 2, 3, 4, 5?
 6 A. That wasn't a sphere of the business that I had
 7 any involvement or oversight with, no. And it
 8 would change from time to time in business
 9 reorganisation, so no.
 10 Q. Okay. Can we have on the screen, please, POL --
 11 this a document we looked at earlier --
 12 POL00006666, page 46, please. Roughly the
 13 middle of the page, where we see a "VB: 64.8"
 14 right. So if you could highlight, please --
 15 thank you very much.
 16 You see where it's just been kindly
 17 highlighted at "VB: 64.8", now this is the
 18 discussion that you had. It's saying this:
 19 "... is Post Office should communicate or
 20 alternatively not conceal known problems, bugs
 21 or errors in or generated by Horizon that might
 22 have financial and other resulting implications
 23 for claimants?"
 24 A. Mm.
 25 Q. Okay, right. Now, with all due acceptance that

110

1 A. Of the organisation.
 2 Q. Okay.
 3 A. Yeah.
 4 Q. Now, the bottom of the page, please, "64.10",
 5 I think it is. Right, here we go. Yes. So
 6 again, highlight, please, "VB: 64.10". Thank
 7 you very much. This is a reference:
 8 "... not to conceal from claimants Post
 9 Office's ability to alter remotely data or
 10 transactions upon which the calculation of the
 11 branch accounts and any discrepancy or alleged
 12 shortfall is depended. I am not sure whether
 13 you would comment on that or are not sure about
 14 that?"
 15 Then your answer:
 16 "I am aware why this has been put in there
 17 but I cannot comment on whether we do have the
 18 ability to do that or not. I suspect it goes
 19 back to a rogue individual in Fujitsu saying
 20 that they could [not] manipulate and
 21 individual's agents' accounts I do not know
 22 whether this is true or not."
 23 Okay?
 24 A. Mm, mm.
 25 Q. So we've got two parts of the same page, one you

112

1 saying you think that the ethos of the Post
 2 Office is good, and that, no doubt, bugs and
 3 errors, if found, would be discussed and,
 4 secondly, regarding altering the system, you
 5 didn't know about any ability to do that, other
 6 than some bloke or some person in Fujitsu?
 7 **A.** At that point in time.
 8 **Q.** At that point in time, okay?
 9 **A.** Yeah.
 10 **Q.** Then your statement, just as a reminder, you say
 11 this, the paragraph we've looked at:
 12 "During the final year of my service, I had
 13 heard that it was possible for Fujitsu engineers
 14 to gain 'backdoor' access into the system
 15 without the knowledge of subpostmasters. That
 16 did give me some cause for concern as I had
 17 previously heard a rebuttal to that internally."
 18 **A.** Mm.
 19 **Q.** Okay, let's add two things together. This
 20 possibility that you talk about in your
 21 statement for Fujitsu engineers to gain backdoor
 22 access to the system without the knowledge of
 23 subpostmasters, where did you get that idea
 24 from, that you talk about in paragraph 98?
 25 **A.** It's something that I heard after the witness
 113

1 Mismatch issue notes", as you'll see in the
 2 middle.
 3 **MR BLAKE:** Mr Stein, sorry to interrupt but is this
 4 a document that was in the Rule 10 request?
 5 **MR STEIN:** No, it arises out of the answers that the
 6 witness has given.
 7 **MR BLAKE:** If Mr Inwood hasn't seen it, I think he
 8 should have an opportunity to see the entire
 9 document. It may be we can do all of that
 10 before lunch but I do ask.
 11 Sir -- I mean, perhaps we can --
 12 **SIR WYN WILLIAMS:** Well, I'm -- this is all very
 13 interesting but the truth is that we now know
 14 absolutely that it was possible for Fujitsu to
 15 access the system remotely and I'm not quite
 16 sure that exploring this with the witness for
 17 whom this must have been peripheral in the
 18 extreme during the course of his work, is going
 19 to get me very far, Mr Stein.
 20 **MR STEIN:** Can I try and shorten it then and put it
 21 in two different ways other than the document?
 22 Okay?
 23 Can we take the document down.
 24 Mr Inwood, in 2010, the document I was about
 25 to show you, if you had been aware of such
 115

1 proofing statement. So in the first quarter of
 2 2018, I think --
 3 **Q.** Right.
 4 **A.** -- after I made the statement.
 5 **Q.** Right. You go on to say:
 6 "That did give me some cause for concern as
 7 I had previously heard a rebuttal for this
 8 internally."
 9 Who did you hear the rebuttal from?
 10 **A.** It was a rumour internally that a senior manager
 11 had rebuked someone else for suggesting that it
 12 was possible for Fujitsu engineers to access the
 13 system remotely.
 14 **Q.** Forgive me for interrupting, Mr Inwood, the
 15 senior manager being --
 16 **A.** Alwen Lyons, the company secretary.
 17 **Q.** Say it again?
 18 **A.** Alwen Lyons, the company secretary.
 19 **Q.** Right. Okay. Now, I'm going to take you to
 20 another document, please, which is FUJ00081584.
 21 I don't believe you've had this before but it
 22 relates to the evidence you've given on these
 23 two matters. Can we just go through who we've
 24 got here. This document is a 2010 document,
 25 okay, and it relates to "Receipts/Payments
 114

1 issues, was discussing what's called a mismatch
 2 bug. It's a bug that affected branches. It
 3 infiltrated a branch to the extent that you
 4 couldn't tell that there was something gone
 5 wrong but, in fact, there was a shortfall, okay?
 6 So completely submarine-like for subpostmasters.
 7 Were you, in your terms of employment, made
 8 aware of any such bug that could have
 9 a devastating effect upon Post Office branches.
 10 **A.** No.
 11 **Q.** No. Secondly, the document goes on at the very
 12 end to talk about the fact that the Fujitsu can
 13 alter branch accounts --
 14 **A.** Mm.
 15 **Q.** -- through a back door. This is in 2010. Were
 16 you aware of that?
 17 **A.** No, not in 2010.
 18 **Q.** Do you think you should have been told about
 19 such issues?
 20 **A.** I think anyone that was managing contractual
 21 issues with a postmaster should have been aware
 22 of that, yeah, because it introduces the
 23 possibility that the evidence that they're using
 24 to determine a contract is unsafe.
 25 **Q.** The fact that a bug, a mismatch bug, that
 116

1 operates in the way I've described in 2010
 2 rather undermines what you said about there
 3 being a good ethos of openness about bugs and
 4 errors within the Post Office, doesn't it?

5 **A.** Well, yeah, the flaws in software bugs, backdoor
 6 access to the system, should not be a secret in
 7 the company because it -- as I've just said, it
 8 introduces the possibility that contracts were
 9 being determined or worse, based on the possibly
 10 unsafe evidence. It's difficult to see how
 11 anyone could arrive at any other conclusion than
 12 that.

13 **MR STEIN:** Sir, no further questions.

14 **SIR WYN WILLIAMS:** Thank you.

15 **MR BLAKE:** Thank you very much, sir, there are no
 16 further questions.

17 **SIR WYN WILLIAMS:** Right. So how are we looking, in
 18 respect of this afternoon, Mr Blake?

19 **MR BLAKE:** We're absolutely fine. This afternoon's
 20 witness will not be particularly long, perhaps
 21 an hour, so perhaps if we could come back in one
 22 hour's time to 1.50.

23 **SIR WYN WILLIAMS:** Yes, that's fine.
 24 Hopefully, I'll be able to solve the mystery
 25 of why I can't mute myself any more. Thank you.

117

1 2023; do you have that?

2 **A.** Yes.

3 **Q.** If you turn to page 20 of that statement,
 4 please?

5 **A.** Yes.

6 **Q.** Do you have a copy with a visible signature?

7 **A.** I do and it's my signature.

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

10 **A.** Yes.

11 **Q.** For the purposes of the transcript, the URN is
 12 WITN08980100. Thank you for coming to the
 13 Inquiry to assist it with its work and for
 14 providing the witness statement that you have.
 15 As you know, I will be asking questions on
 16 behalf of the Inquiry.

17 Today I'm going to be asking you about
 18 issues which arise in Phase 4 of the Inquiry,
 19 focusing on the policy, procedure and practice
 20 of the Post Office, in relation to the action
 21 taken by the Post Office against Post Office
 22 employees, following discovery of apparent
 23 shortfalls in branch accounts.

24 You were with the Post Office for 31 years,
 25 I think, after you joined in 1984; is that

119

1 **MR BLAKE:** Thank you very much, sir.

2 **(12.50 pm)**

3 **(The Short Adjournment)**

4 **(1.50 pm)**

5 **MS PRICE:** Good afternoon, sir, can you see and hear
 6 us?

7 **SIR WYN WILLIAMS:** I can, thank you.

8 **MS PRICE:** May we please call Mr Pegler.

9 **SIR WYN WILLIAMS:** In a moment, I just wanted to put
 10 on record the fact that, due to my concern that
 11 my IT system was breaking down just before
 12 lunch, I omitted to thank Mr Inwood for his
 13 witness statement and for his oral evidence.
 14 I would like to put on record my thanks to
 15 him for providing the statement and oral
 16 evidence.

17 Now you can call the witness, Ms Price.

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

19 **THOMAS ABRAHAM PEGLER (sworn)**

20 **Questioned by MS PRICE**

21 **MS PRICE:** Could you confirm your full name, please,
 22 Mr Pegler.

23 **A.** Yeah, it's Thomas Abraham Pegler.

24 **Q.** You should have in front of you a hard copy
 25 witness statement in your name, dated 12 May

118

1 right?

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

3 **Q.** Initially you joined as a postman?

4 **A.** Yes.

5 **Q.** You became a counter clerk in 1986 --

6 **A.** Yes.

7 **Q.** -- and a Supply Chain Manager in 1986.

8 Apologies, I think we must have the wrong date
 9 there. Forgive me.

10 You moved across to Counters as a counter
 11 clerk in 1986?

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

13 **Q.** You were subsequently promoted to assistant and
 14 then branch manager --

15 **A.** Yes.

16 **Q.** -- and an ECCO+ Implementation Manager. Could
 17 you please explain what ECCO+ was?

18 **A.** Yeah, ECCO+ was a forerunner to the Horizon
 19 system, employed solely in Crown Offices. It
 20 wasn't networked, it was a standalone, but every
 21 counter position that a terminal and I think
 22 there was a back office processor and, if
 23 I remember correctly, it was operated via
 24 a 3.5-inch floppy disks, which went to Product
 25 and Branch Accounting weekly in Chesterfield,

120

1 which contained all of the branch's accounts.
 2 **Q.** What was your role in relation to this system?
 3 **A.** It was basically there as a support to branch
 4 managers and their staff when ECCO was
 5 implemented, which basically ran -- two weeks
 6 before the office, I would take delivery, run
 7 diagnostics, be in branch while they performed
 8 their final written manual cash account, having
 9 already installed all the positions, and then
 10 I'd be there for a week until they completed
 11 their first electronic balance, and there as
 12 a support and trainer, and then move on to the
 13 next branch.
 14 **Q.** What were the differences between the ECCO+
 15 system deployed in Crown Offices before Horizon
 16 was introduced? What was the difference between
 17 the ECCO+ system and the Horizon system?
 18 **A.** The main difference, I think, were better
 19 hardware with touchscreens, which we didn't
 20 have, so a difference in the keyboard,
 21 a difference in the hardware, the fact that it
 22 was all networked as well, and -- down the line,
 23 meant there was no need for floppy disks.
 24 **Q.** Can you recall when Horizon was rolled out in
 25 Crown Offices?

121

1 sales.
 2 **Q.** The Crown Network covered Crown Office branches,
 3 otherwise known as directly managed branches; is
 4 that right?
 5 **A.** Yes.
 6 **Q.** Those who worked in Crown Office branches were
 7 employed under contracts of employment by the
 8 Post Office, weren't they?
 9 **A.** They were, yes.
 10 **Q.** In contrast to subpostmasters, who were not
 11 employed by the Post Office but were agents and
 12 operated branches pursuant to a contract for
 13 services?
 14 **A.** Correct, yes.
 15 **Q.** Were you ever involved in the operation of
 16 branches outside of the Crown Network?
 17 **A.** Not really. When the business decision was to
 18 look at the Crown Office and how profitable they
 19 were, one of the options was franchising, so
 20 I did become involved in supporting the
 21 franchises as they occurred, which often meant
 22 being on site when an office was closing or
 23 converting to a franchise and then being there
 24 as a bit of a support for the franchise office
 25 as it started running.

123

1 **A.** It must have been front ended. There was
 2 probably, I think there was a Thames Valley
 3 project of sorts, so it could well have been the
 4 late '90s, early 2000s.
 5 **Q.** You were seconded, I think, to the head office
 6 project team in 1997; is that right?
 7 **A.** That's correct, yes.
 8 **Q.** What was the focus of your work when you were
 9 part of this team?
 10 **A.** The focus of that was mainly an organisation
 11 review, looking at all aspects of the business
 12 from territorial, regional and Head Office and
 13 back office support as well. So I was primarily
 14 involved as a support to the very senior
 15 managers on that team and a librarian collating
 16 all documentation about how the business was
 17 run.
 18 **Q.** You were a Head Office based Crown Service and
 19 Efficiency Manager from around 1998; is that
 20 right?
 21 **A.** That's correct, yes.
 22 **Q.** You held roles which focused solely on the
 23 operation of the Crown Network from this point
 24 until you left the Post Office in 2015?
 25 **A.** Yes, all aspects of operational work other than

122

1 This could have been an independent
 2 franchise or a company franchise, for example
 3 WHSmiths, but as time went on, there was more
 4 bespoke support for how franchise offices were
 5 brought in.
 6 **Q.** Turning, please, to Post Office losses and gains
 7 policy, you say in your statement to the Inquiry
 8 that Crown net losses had always been an area of
 9 concern over the years when you worked for the
 10 Post Office; is that right?
 11 **A.** Yes, yes. It was seen as a manageable line on
 12 a P&L.
 13 **Q.** Could we have on screen, please, POL00083982.
 14 This is a document entitled "Losses in the Crown
 15 Network". It appears from its contents to date
 16 to late 2007 or early 2008; does that sound
 17 about right?
 18 **A.** It sounds about right, yes.
 19 **Q.** You say in your statement that you remember
 20 assisting your manager pulling some of the data
 21 together for this document?
 22 **A.** Yes.
 23 **Q.** Under "Background", this document explains as
 24 follows:
 25 "There has been considerable concern in the

124

1 Crown Network due to the recent trend in counter
2 losses and Postshop shrinkage, together
3 totalling 2.5m for all Crown Offices."

4 Can you just explain for us what Postshop
5 shrinkage was?

6 A. Yeah, sure. When the business wanted to get
7 into the retail area, there were very few
8 Postshops, which were front of house, a retail
9 area not behind screens, and shrinkage was
10 effectively stock going missing, either coming
11 in or going out from the suppliers; stock going
12 out the front door from loss and theft;
13 accounting errors; basically any -- anything
14 where there's deemed to be a loss in the retail
15 stock side of the Postshop.

16 Q. There is a table below setting out net losses,
17 reported for offices remaining in the Crown
18 Network and there is a number given for that,
19 373 offices.

20 A. Yes.

21 Q. We can see the counter loss stood at
22 1.393 million in 2003, stayed at similar levels
23 in 2004 and 2005, and then went up by
24 53 per cent to 2.048 million in 2006, and up
25 25 per cent on that in 2007, with a figure of
125

1 "In 1999", it says this:

2 "In 1999 a loss policy was developed to
3 advise on the controls required at the Post
4 Office Counter, following the introduction of
5 'multi-user' tills in the Crown Office Network.
6 Guidance was provided to improve security of
7 stock, cash and equipment and user log on IDs.

8 "Branch Manager responsibilities were also
9 defined and clear instructions given to improve
10 awareness of loss performance at branch and
11 individual level. The need for balance and
12 supervisory surprise (Snap) stock checks were
13 reiterated as well as capturing loss and gains
14 data in order to deploy the escalation process
15 agreed at the time, ie '3 in 3 losses over £20',
16 '6 in 6 losses over £20' and '9 in 9 losses over
17 £20' resulting in interviews with staff.

18 "However, despite the introduction of
19 a national policy document it was consistently
20 deployed due to a number of factors."

21 A number of reasons are then set out for
22 that and the conclusion is set out over the
23 page, please, about a third of the way down the
24 page, and it says:

25 "Due to the recent poor loss performance and
127

1 1.740 million. Pausing there, was there any
2 discussion at this time of the possible reasons
3 for the losses in the Crown Office Network?

4 A. From what I remember, the biggest impact and
5 focus on the figures was that the business
6 wanted to move to a retail base and a financial
7 specialist base, and I'm not sure when we
8 partnered with the Bank of Ireland but a lot of
9 managers were coming in externally and wouldn't
10 necessarily know the operational processes in
11 order to manage the counter.

12 Now, simplistically and from my point of
13 view, when I went to training (a) we were told
14 don't think of cash as cash, it's just an item
15 of stock; and (b) always take the money first.
16 And simplistically, my belief, and the belief of
17 people in the team, was that the basics of
18 conducting a transaction, taking the money or
19 the payment was being missed off.

20 That's a very simplistic view to take,
21 I know, but the culture of the business was
22 trying to turn to get more profit and get back
23 to profitability from financial product sales.

24 Q. This document assists with the policy which was
25 in place from 1999, so about halfway down there,
126

1 trend over the recent years, it has been decided
2 that action should be taken to address future
3 losses in the Crown Office Network."

4 You refer in your statement at paragraph 18
5 to the silo way of working in the '80s and '90s.
6 Can you just explain what you meant by that?

7 A. Yeah. I mean, early on when I joined,
8 departments were very, sort of, insular and they
9 kept to themselves and there didn't seem to be
10 much collaboration around at the time, and
11 I think I said in my statement, we got better at
12 that. Obviously, when I went to Head Office in
13 the '90s, the view at head office differed
14 around the Retail Line, and when I say the
15 Retail Line, I mean directly managed branches
16 like Crown, sub offices and franchises.

17 My view is that we were there to support the
18 frontline. So branch managers and
19 subpostmasters had a big enough job, if you
20 factor in the customer care elements. So we
21 were very much as a support. And the business
22 developed that further. By the time, I'd left
23 they had sort of pipeline initiatives, where we
24 were looking at if we did this at Head Office,
25 how would it impact the Retail Line, and looking
128

1 at timing of events and things like that, which
 2 would never have happened in the '80s or '90s.
 3 **Q.** Was this silo way of working something which the
 4 review happening at this time, in 2008, was
 5 trying to address?
 6 **A.** When you say the review, was it the --
 7 **Q.** So this document here is discussing actions
 8 which should be taken, and we'll come on to the
 9 policy document dated 2008, which appears to
 10 result from this review and this consideration
 11 given in this document. I'm asking, in relation
 12 to the silo way of working, whether that was
 13 something that this review, and then the new
 14 policy in September 2008, was intended to
 15 address?
 16 **A.** I think it was addressed before then, probably
 17 in pre-reviews, like sales and service reviews,
 18 SCS reviews, probably from the late '90s
 19 onwards, but I think this review was really
 20 instigated around the actual loss performance.
 21 But, at the same time, trying to make the
 22 management of losses and gains seen as
 23 a potential training, could be a training issue,
 24 not just focused purely on the punitive side of
 25 things.

129

1 which introduces the policy and sets out its
 2 purpose. It reads as follows:
 3 "The impact of losses in the Crown Office
 4 Estate is having a serious effect on our ability
 5 to deliver the three2eleven plan to bring us
 6 back into profitability by 2011. This Policy
 7 has been redesigned to provide clear and
 8 consistent guidance to the Crown Office Managers
 9 and their Assistants as to their
 10 responsibilities for the recording, maintenance
 11 and monitoring of losses and gains. The Policy
 12 will also provide Crown Office Managers with
 13 a tool to be able to effectively manage losses
 14 and gains and to take appropriate measures to
 15 reduce losses. It also reiterates the security
 16 controls required to protect both the business
 17 assets as well as the individuals themselves.
 18 Finally, for the first time the Policy details
 19 a commitment to provide training and support to
 20 all Crown Office Managers in how to deploy the
 21 Policy and deliver on their responsibilities."
 22 Going over the page, please, Section 3
 23 covers the "Annual Certificate of Compliance".
 24 Could you explain briefly, please, what this
 25 was?

131

1 **Q.** A new mandatory losses and gains policy in the
 2 Crown Office Network was introduced in September
 3 2008. Could we have that on screen, please.
 4 It's POL00084075. You address this document at
 5 paragraph 4 of your witness statement to the
 6 Inquiry and you say you recall reviewing this
 7 document at the time.
 8 **A.** Yes.
 9 **Q.** Can you just explain what you mean by reviewing?
 10 **A.** Yeah, there was a document in place and I can't
 11 remember, it would have been a similar title,
 12 because when I first went to Head Office, there
 13 was a document that covered the management of
 14 losses and gains and, periodically, I was asked
 15 in my position to review that document as other
 16 impacts, for example, shared tills, Horizon
 17 coming in would impact this.
 18 So the 2008 review, I think was more
 19 structured, in that we had more input from other
 20 stakeholders around the business, and
 21 I particularly remember working closely with
 22 Finance because it was all around getting
 23 ownership for branch managers on their P&L and
 24 score cards.
 25 **Q.** Could we go, please, to page 3 of this document,

130

1 **A.** Yeah, it was a certificate that branch managers
 2 signed off yearly to say that all of the
 3 compliance elements of running a Post Office --
 4 and that could be security, the management of
 5 visitors to a branch, fire extinguishers, the
 6 evacuation policy, contingency planning -- was
 7 all signed off. So branch managers had a duty
 8 to sign that off annually, staggered throughout
 9 the year for the branches, and then it was
 10 posted centrally.
 11 **Q.** Then about halfway down this page, Section 4, we
 12 have "Supervisory Surprise Checks & Misbalance
 13 Checks". What was the difference between
 14 supervisory surprise checks and misbalance
 15 checks?
 16 **A.** Branch managers, from when I remembered, always
 17 had a duty to perform these checks. Not sure
 18 that they went on as declared in the policy, as
 19 on a regular basis as they I did prior to any
 20 automation, but it was basically an element of
 21 surprise to say, "Ah, Geoff, I'm going to check
 22 your counter stock today", not necessarily after
 23 balance, but it could be on any day of the week
 24 which involved a branch manager, effectively,
 25 just doing a surprise random check, but the

132

1 branch manager would record that and then the
 2 Area Manager or above, when they visited the
 3 branch, would ask to see their record of these
 4 checks.
 5 On the other hand, a misbalance check,
 6 I think when I was involved in this £30 was the
 7 set criteria. So what we said, a second pair of
 8 eyes, be it the assistant or the manager or
 9 another person in the branch, should physically
 10 check the cash and stock before it is moved on
 11 or used again. Because, sometimes, a second
 12 pair of eyes could help find things.
 13 **Q.** Going over the page, please, page 5., that is in
 14 this document, about halfway down the page, we
 15 have, in bold and underlined:
 16 "The followed steps are carried out when
 17 undertaking a financial audit at a Crown Office
 18 and are recommended for the Crown Managers to
 19 adopt when performing a stock check."
 20 The bullet points there of steps to be taken
 21 include:
 22 "Confirm the location of all cash and stock
 23 and ascertain if the stock is an individual or
 24 multi-user stock;
 25 "Obtain cash declaration print for the night
 133

1 bringing disciplinary procedures to bear where
 2 applicable."
 3 Then finally on this page:
 4 "The Crown Office Manager has responsible
 5 for ensuring the approved systems for
 6 controlling losses and gains are adopted and
 7 implemented."
 8 Over the page, please, Section 5, towards
 9 the bottom of the page. This addresses "Branch
 10 Trading" and explains:
 11 "Branch Trading should be undertaken in
 12 accordance with the latest Branch Trading
 13 booklets, which include details of balancing
 14 stock units, production of the Branch Trading
 15 Statement, production of reports and despatch of
 16 documents.
 17 "Following the process below prior to Branch
 18 Trading will help to ensure that only true
 19 losses and gains are posted to Profit and Loss
 20 at Branch Trading."
 21 Do you recall the introduction of branch
 22 trading?
 23 **A.** Very vaguely. I think for Crowns it meant
 24 moving to a branch trading calendar, which could
 25 be a four or five-week period but what we did,
 135

1 prior to the check and previous week's full
 2 Balance Snapshot or Branch Trading Statement,
 3 daily prints and all vouchers on hand;
 4 "Obtain the following printouts from the
 5 Horizon system
 6 "office snapshot, if multi-user stock is in
 7 operation
 8 "stock unit snapshot for each stock, if
 9 individual stock balancing is used
 10 "suspense account summary."
 11 Then:
 12 "Reconcile stock to the snapshot printout;
 13 "Reconcile daily prints and vouchers on hand
 14 to the snapshot print;
 15 "Reconcile non-value items (MVLs, bus
 16 passes, etc);
 17 "Inform colleague(s) of the result of the
 18 check."
 19 Then there is some further explanation in
 20 the paragraph below:
 21 "The basis of control is that there is
 22 an awareness of the levels of discrepancies in
 23 conjunction with any actions necessary to
 24 implement improvements, protect our people,
 25 where it highlighted poor performance, including
 134

1 we took it in the Crown Network that we would
 2 still prepare a balance weekly, which would be
 3 a balance period, so, effectively, where this
 4 happened on a Wednesday night we'd still do
 5 that, but the main accounts would be posted
 6 monthly, whereas I think in other parts of the
 7 Network, for example sub offices, possibly
 8 franchises or modified scale payment offices,
 9 they effectively did their balances once
 10 a month. But in Crowns we decided we'd still do
 11 a weekly balance, which would effectively
 12 declare fully the cash and stock on hand.
 13 **Q.** Going over the page, please, the checks which
 14 should be conducted before posting losses or
 15 gains are set out. Scrolling a bit further
 16 down, we can see that transaction corrections
 17 are addressed.
 18 Over the page again, please, to Section 6.
 19 This deals with "Counter Loss & Gains Management
 20 Reporting". In summary, this section sets out
 21 the different steps to be taken for different
 22 levels of losses, doesn't it?
 23 **A.** Yes.
 24 **Q.** So the first level of loss being £5 to £249.99,
 25 then losses over £250, and then a bit further
 136

1 down the page to the bottom, losses over £2,000.

2 Going, please, to page 11 of this document,
3 this addressed the loss escalation process and
4 trigger points. Could you please explain what
5 the loss escalation process was?
6 **A.** Yes, this had been around for many years and
7 anything to do with losses and gains was subject
8 to national discussion with the CWU Union and
9 the CMA Union for managers. Effectively, in the
10 early days, and I think I said in my statement,
11 it was part of the personnel rules and
12 regulations of anyone working in the Post
13 Office, and it had developed over the years, so
14 that if a trigger point was triggered, that
15 individual or the people using that multi-user
16 stock would enter in stage 1 and, basically, it
17 would have been a watching brief for the manager
18 to keep an eye on performance of the loss
19 record, because they could actually end up
20 balancing fine after that and then they would go
21 back on to start from scratch, or if further
22 losses were encountered, that it could be
23 triggered up to stage 2 and 3 above.

24 So I think the first stage there is quoting
25 three losses of £30 or more in a reference

137

1 Plan agreed and notes taken and signed. Notice
2 given to colleagues that they will switch to
3 individual balancing by stage 3 if improvement
4 is not forthcoming and switch is not appropriate
5 at this stage 2."

6 Then, finally in this section, stage 3,
7 further 3 losses of £30 or more, over the period
8 of three months following the stage 2 interview:

9 "3rd Informal Interview [is the action with]
10 Crown Office Manager -- colleagues moved on to
11 individual stocks. Action Plan agreed and notes
12 taken and signed."

13 What was the reason for moving someone on to
14 individual stocks?

15 **A.** I think the key thing is if you have an
16 individual stock as we operated earlier on, that
17 was your cash and stock, it was your own
18 responsibility. There would be no other people
19 using that stock. So, in agreement, what we
20 decided was that you couldn't take formal action
21 where a multi-user stock was being used.
22 Unless, for example, if you knew that somebody
23 was serving and a major transaction came in for,
24 say, £2,000 premium bonds and you forgot to take
25 the money, you knew that that individual had

139

1 period, and sitting behind this for the branch
2 manager, I think was a sheet, an Excel-based
3 spreadsheet, where they could keep track on all
4 of this.

5 **Q.** We see here that this table loss escalation
6 process sets out the various stages and we start
7 with the multi-user stocks, and stage 1, as
8 you've just referred to, the performance which
9 triggers action, and the action for stage 1 is:
10 "Informal interview [with a] Crown Office
11 Manager -- with colleagues, identified as having
12 access to the stocks that have incurred losses,
13 to raise awareness of their performance and to
14 reiterate the Loss Escalation Process. Action
15 Plans should be agreed and notes taken and
16 signed. Consideration given to a switch to
17 individual balancing if appropriate at this
18 stage."

19 We then have stage 2, a further three losses
20 of £30 or more, over the period of three months
21 following the stage 1 interview, and the action
22 at that point is:

23 "2nd informal interview [with a] Crown
24 Office Manager -- to review performance and
25 agree the level of support required. Action

138

1 caused that mistake.

2 So it was seen very much that on the
3 punitive side of things, obviously dealing with
4 the training first, if we had to take formal
5 action, it could only be taken where that
6 individual had sole responsibility for cash and
7 stock.

8 **Q.** We then in the table have individual stocks and
9 stage 1 of that, when someone is on individual
10 stocks:

11 "3 losses of £30 or moreover a period of 3
12 months."

13 The action is:

14 "Informal interview ... to raise awareness
15 of loss performance, agree the level of support
16 required and to reiterate the Loss Escalation
17 Process. Action plan with notes signed."

18 Then we see number of stages that follow.
19 Stage 2, further losses. There's another
20 informal interview.

21 Stage 3, we have formal interview, and
22 a number of steps taken out there, including
23 notification that all future losses of £5 or
24 more will be taken into account. Again, action
25 plan with notes signed.

140

1 Stage 4, at this point you have a further
2 four losses of £5 or more, over the period of
3 six months, following the stage 3 interview.
4 Here the action is formal interview with the
5 Crown Office manager to review performance and
6 agree the level of support required and to
7 reiterate the loss escalation process, reiterate
8 the possible consequences of reaching L&G
9 escalation stage 5.

10 Stage 5, further three losses of £5 or more
11 over the period of six months following the
12 stage 4 interview. Formal interview is the
13 action, with appropriate management level from
14 outside of immediate Crown Office, to review
15 performance and consider disciplinary action
16 under the Conduct Code.

17 You addressed the loss escalation process at
18 paragraph 16 of your statement to the Inquiry.
19 Could we have that on screen, please, it is
20 WITN08980100 and page 15, please, of that
21 document. Paragraph 16 there:

22 "The loss escalation process in the Crown
23 Network was designed to raise awareness, share
24 best practice and monitor losses. It could also
25 lead to the conduct code being triggered on

141

1 question, requirement for the Crown Office
2 employees to make good losses, I'm asking
3 whether there was any reference in that policy
4 document that we looked at to any requirement
5 for them to do so?

6 A. No requirement, no.

7 Q. We'll come on to your statement that deals with
8 what options were open to Crown Office employees
9 in a moment.

10 A. Thank you.

11 Q. Was there any obligation on Crown Office
12 employees to use their own funds to cover any
13 losses identified -- and again, using the word
14 "obligation"?

15 A. No obligation, no.

16 Q. Was that something which was ever considered as
17 part of the strategy for dealing with Crown
18 Office losses?

19 A. As far as I can remember, no.

20 Q. Why not?

21 A. Basically, they're our employees and I think it
22 would be difficult, from a HR perspective, to
23 enforce that, unless there was a major rewrite
24 of the contract manual but I don't recall it
25 ever being a consideration.

143

1 individuals if loss performance fell outside of
2 agreed levels."

3 You also refer at paragraph 20 of your
4 statement to moving away from focusing on the
5 punitive side, and you have mentioned that again
6 today, and, instead, focusing on the why. So
7 the impact of losses on the business.

8 From the policy document we have just looked
9 at and these parts of your statement, it appears
10 that the focus, when it came to Crown losses was
11 on raising awareness about best practice,
12 establishing what support an employee might need
13 and, ultimately, considering disciplinary action
14 under the Code of Conduct. Is that a fair
15 assessment?

16 A. Yes, very much a fair assessment of the Crown
17 Network.

18 Q. There was no mention in the September 2008
19 losses and gains policy that we've just looked
20 at to any requirement for Crown Office employees
21 to make good any losses that were discovered, is
22 there?

23 A. No. The -- when I joined, it was 50p, plus or
24 minus. It went to £2 and I think it was £5 --

25 Q. If I can just stop you there, in terms of my

142

1 Q. If we could go to page 18, please, within this
2 statement. That top paragraph there, I think
3 this is what you were referring to just a moment
4 ago, and so just to read that out:

5 "Within the Crown Network when I started you
6 had tolerance built into your balance, eg if you
7 were plus/minus 50p out on balancing you could
8 put in or take out the cash up to that value,
9 this became plus/minus £2 then plus/minus £5
10 over time. If Crown staff declared losses then
11 the Losses & Gains Policy would be applied by
12 the Branch manager."

13 Is what you're saying here this: that if
14 there was a minor amount by which the till was
15 out, they could put in up to that minor amount
16 rather than declaring --

17 A. Yes.

18 Q. -- which would trigger the policy and the steps
19 we've looked at?

20 A. Certainly, you wouldn't expect to see any
21 declared -- depending on the time, you wouldn't
22 expect to see any declared losses, for example,
23 of less than £2 in the Crown Network.

24 Q. Going back a page in the statement, please,
25 towards the bottom, at paragraph 21 you deal

144

1 with your understanding of the position in
 2 relation to shortfalls experienced by
 3 subpostmasters. You say:
 4 "My understanding was that Subpostmasters
 5 had to make good any shortfalls within their
 6 accounts in line with their contract with the
 7 Post Office. This would mean Subpostmasters
 8 putting in their own cash so that the total
 9 balance agreed with the derived figure (eg paper
 10 based pre-Horizon or what was held in Horizon
 11 when their branch was automated)."

12 You've touched on this in your answer
 13 already, but why was this different approach
 14 adopted for subpostmasters when compared with
 15 Crown Office employees?

16 **A.** Historically, there'd always been a difference,
 17 going back long before I joined the business,
 18 and it was the differentiation between
 19 subpostmasters are there -- it's their own
 20 business, they're agents of the Post Office,
 21 whereas the staff are directly managed by Post
 22 Office Limited.

23 **Q.** Did anyone raise any concern ever, as far as
 24 you're aware, about the difference in approach
 25 between the two groups?

145

1 vitally important not only from a security
 2 aspect, but is a requirement under our licensing
 3 requirements for the FSA (Financial Services
 4 Authority).

5 "Crown Office Managers must make regular
 6 checks as to the users listed on Horizon and
 7 ensure people have the correct level of access
 8 (minimum access requirement as per Information
 9 Security Policy)."

10 What was the reasoning behind these mandated
 11 actions?

12 **A.** It was best practice, good housekeeping. A good
 13 example would be a reserve member of staff who
 14 floated around, say, five or six offices and
 15 they could potentially be attached to stock
 16 units in those five or six offices. So that
 17 element it's all about good housekeeping. We
 18 probably got input from the Security team or the
 19 Horizon team on these bullet points, as well,
 20 for the policy.

21 **Q.** Turning, please, to page 19 of this document,
 22 section 8.9. About halfway down, that's it,
 23 "Suspensions", and the first bullet point here
 24 reads:

25 "If the Crown Office Manager, deputy or any

147

1 **A.** No.

2 **Q.** Could we have, please, the September 2008 Crown
 3 Office losses and gains policy back on screen,
 4 please. That's POL00084075, and page 16 of that
 5 document, please. Towards the bottom of the
 6 page we have the start of section 8 entitled
 7 "Security Compliance". Over the page, please,
 8 to section 8.2 "Horizon". This reads as
 9 follows:

10 "Crown Office Managers must ensure the
 11 following actions are undertaken:

12 "Need to ensure that only colleagues who are
 13 working at their offices are logged onto the
 14 Horizon system. Anyone who leaves the office
 15 must be removed from the system.

16 "All colleagues must have their own user ID
 17 and must only be attached to the stock units
 18 they are operating at the time -- it is not
 19 acceptable to have all users attached to a stock
 20 unit.

21 "Where possible, users not operating a stock
 22 unit, should be placed into default.

23 "Passwords are sacrosanct, and for each
 24 individual's protection. Under no circumstances
 25 should passwords be known or shared, this is

146

1 colleague has any suspicion about someone, they
 2 have a duty to report it. This can be
 3 difficult, especially if you're not sure.
 4 Please contact the NBSC, in complete confidence
 5 on [a number]. Your information will be passed
 6 onto the Investigation Team who will assess the
 7 information. Your details will remain
 8 confidential."

9 The last bullet point there:

10 "Any loss can be reported if there are
 11 suspicious circumstances, irrespective of the
 12 amount. Again, the Investigation Team will
 13 assess the information and a decision will be
 14 made on whether any further action is taken."

15 What would you have considered suspicious
 16 circumstances to be?

17 **A.** It could have been a variety of things involving
 18 cash or stock, volumes of transactions. One
 19 that I did come across when we did certain
 20 transactions was a huge increase one day, which
 21 alerted the branch manager to say "Something's
 22 not right here, who do I get in touch with?" So
 23 that would fall under that category.

24 **Q.** Would a shortfall or loss on its own have been
 25 enough to amount to suspicious circumstances for

148

1 you?

2 **A.** Potentially, yes. I think the issue for me is,
3 at the time, I was not aware of issues with
4 Horizon. If we were, that potentially would
5 fall under that category.

6 **Q.** We have another version of the September 2008
7 the policy document which you have commented on
8 at paragraph 6.4 of your statement to the
9 Inquiry. Could we have that document on screen,
10 please. It is POL00084076. You say in your
11 statement that this was a version for use as
12 an operational document for branch and Area
13 Managers. What was the reason for having
14 another version for branch and Area Managers?

15 **A.** From what I remember, this brought out the key
16 operational points without appendices. So it
17 was, basically, a quick guide. The contents
18 should be exactly the same as the overall
19 policy, without all of the various discussion
20 points. So it was really just identified as
21 a quick guide for branch managers.

22 And this, I think, was rolled out at
23 national workshops. So we had input from branch
24 managers and Area Managers when we put this
25 document together and we also rolled it out to

149

1 "After branch trading was introduced a full
2 branch account statement was only required 12
3 times a year."

4 Is that right?

5 **A.** Yes.

6 **Q.** But you say that:

7 "Individual stock unit balancing was still
8 taking place weekly in Crowns so there well up
9 balance periods within a trading period."

10 Is that right?

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

12 **Q.** You've said usually four to five balance periods
13 in a trading period?

14 **A.** Yes.

15 **Q.** In terms of what a Crown Office branch should
16 do, if there was an unexplained discrepancy when
17 they were trying to balance, you address this at
18 paragraph 12VII of your statement. Can we have
19 that on screen, please, page 12 of that
20 statement, please. Scrolling a little further
21 down, please, it's that last paragraph there:

22 "For colleagues working on the counter in
23 a branch performing a balance (physical check of
24 their cash and stock), only one option really
25 existed and that was to confirm figures and roll

151

1 the Network, as well. So I think it came from
2 a branch manager or a team saying, "We need
3 something more snappier" because there's quite
4 a lot in there, there's a lot of material.

5 **Q.** Could we go to section 1 of this document,
6 please, page 3?

7 Section 1 here is a little different to
8 section 1 in the other version we've been
9 looking at. In particular, it includes the
10 actual figure for Crown Office losses in 2007 to
11 2008 of 2.2 million. Do you know why this
12 figure was not included in the other version?

13 **A.** No. No. So this document is the quick guide.

14 **Q.** Moving, please, to the balancing process for
15 Crown Office branches, you say in your statement
16 to the Inquiry that Crown Office branches used
17 to balance their stock units weekly on
18 a Wednesday evening. The office would then
19 amalgamate and run the office plans from
20 Thursday, sending all supporting documentation
21 for that week in a pouch to P&BA in
22 Chesterfield. Just to be clear, what does P&BA
23 stand for?

24 **A.** That would be Product and Branch Accounting.

25 **Q.** You say:

150

1 over into the next balance period or trading
2 period. If there was a discrepancy between
3 physical cash and stock they could recheck
4 themselves, ask a colleague or manager to
5 recheck -- this would of course be time
6 dependent and may find the error -- before
7 confirming and rolling over. The branch manager
8 may find errors next day, eg transfers between
9 Stock Units not balancing, which rectify the
10 original error. Depending on the value/volume
11 of the loss or gain would decide what route
12 through the Losses & Gains procedure the branch
13 manager would take".

14 What were the repercussions of rolling over
15 when a reason for a discrepancy had not been
16 found?

17 **A.** If the reasons hadn't been found, then the loss
18 or the gain would be declared and that would go
19 against the users who were using that stock that
20 week, or the individual, if it was an individual
21 stock, and that loss would be posted against
22 those individuals or that person, and that would
23 become subject for the losses and gains
24 procedure.

25 **Q.** Was there any way for a Crown Office branch to

152

1 challenge an apparent discrepancy where it was
 2 unexplained?
 3 **A.** I believe so, yes. I mean, I had a team of
 4 people who faced up with branch managers and
 5 regional managers. When this process was bedded
 6 in, as I say, it was delivered via a workshop
 7 and there were various spreadsheets to capture
 8 loss record. All of my team were ex-branch
 9 managers and I think, informally, they would be
 10 on the end of a phone or a visit to a branch if
 11 there were unexpected losses.

12 They were my eyes and ears. I got out quite
 13 a bit myself but I do not recall any issues
 14 rising to me about unexplained losses or gains
 15 due to the Horizon system in the Crown Network.
 16 **Q.** You've explained in your statement that,
 17 although Crown Office branches could be audited
 18 by the audit team or field support team as they
 19 later were, financial audits of Crown Office
 20 were few and far between under normal operation.
 21 Was the reason for that linked to the process in
 22 place whereby branch managers were obliged to
 23 conduct certain checks themselves?

24 **A.** Yes, I think from a risk perspective, the audit
 25 team saw the Crown Network as being low risk,

153

1 **Q.** You addressed this at paragraphs 6V and 6VI of
 2 your statement. This rewritten version of the
 3 policy was dated 24 April 2013. We need not
 4 display it now but, for the record, the
 5 reference for that document is POL00088124.
 6 What did you understand the reason for this
 7 change to be?

8 **A.** At the time, my understanding, my assumption,
 9 was that, having been involved in organisation
 10 design team in the late '90s, early 2000s, that
 11 Network or the Retail Line were deployers of
 12 policy, and the actual policies should sit
 13 elsewhere at Head Office. That was my
 14 understanding then.

15 Maybe now I've got a different view, in that
 16 in 2013, it seemed that the business was looking
 17 at bringing in management of policies centrally.

18 **Q.** This version of the policy removed the loss
 19 escalation process. What was the reasoning
 20 behind that?

21 **A.** It was branch managers taking ownership of
 22 running their own offices. It was a bit nanny
 23 state, if you look at the previous policies, and
 24 we wanted to get to an endgame that branch
 25 managers take full ownership of managing their

155

1 purely because of the supervisory element within
 2 each branch and the fact that they had Area
 3 Managers that visited. So they were seen as low
 4 risk, which meant that they didn't get the level
 5 of audit that potentially Crowns had when
 6 I joined the business.

7 **Q.** Was there any other reason why this approach was
 8 taken to auditing Crown Office branches that
 9 you're aware of?

10 **A.** It became more procedural in terms of
 11 compliance. The FSAs would go out. I had
 12 a team of regional support advisers who would
 13 administer, for example, the annual certificate
 14 of compliance, and checks like that, but the
 15 actual financial and stock control element of
 16 an audit were few and far between in the Crown
 17 Network.

18 **Q.** In 2013 there was a change, wasn't there,
 19 whereby the Security team headed by John Scott
 20 took ownership of the losses and gains policy.

21 **A.** Yes.

22 **Q.** This led to the rewriting of the mandatory
 23 losses and gains policy for the Crown Office
 24 Network by the Security team, didn't it?

25 **A.** It did, yes.

154

1 branch, their people, their P&L, and a certain
 2 amount of -- not leeway but management of that
 3 should be given back to branch managers and that
 4 was the Security team we were working with at
 5 the time.

6 **Q.** Was it any part of the reasoning that there
 7 were, by this point, investigations taking place
 8 into the integrity of the Horizon system,
 9 following allegations that the system had been
 10 causing apparent discrepancies?

11 **A.** That, at the time, I was not aware of at all.

12 **Q.** At paragraph 22 of your statement, you say that
 13 the term "bugs, errors and defects" was not in
 14 your vocabulary when you worked for the Post
 15 Office and that the business line was that the
 16 Horizon system was robust. Who was this
 17 business line coming from?

18 **A.** Towards the end of my work in the Post Office,
 19 so probably 2010 to 2015, I know that there were
 20 various programmes. It was in the media. We
 21 were told via our Internal Communications Team,
 22 if you were approached by journalists or
 23 subpostmasters, members of staff, branch
 24 managers, that you were to explain that Horizon
 25 was robust, there had been reviews and it was

156

1 fine and there was a contact number that we
 2 should put people onto. So my understanding is
 3 that came from the top, that came from the
 4 board.

5 **Q.** You may not have used the terminology bugs,
 6 errors and defects but you do recall, don't you,
 7 there being blue screen issues arising with
 8 Horizon?

9 **A.** Yes, yes.

10 **Q.** That's something you address at paragraph 23 of
 11 your statement. You also recall there being
 12 Horizon software releases planned and delivered
 13 to rectify transaction issues; is that right?

14 **A.** That's right.

15 **MS PRICE:** Sir, those are the questions that have
 16 for Mr Pegler.

17 **SIR WYN WILLIAMS:** Are there questions from anyone
 18 else?

19 **MS PRICE:** There are questions from Ms Page, sir.

20 **SIR WYN WILLIAMS:** Right, all right. Yes, Ms Page.

21 **Questioned by MS PAGE**

22 **MS PAGE:** Thank you, sir.
 23 Mr Pegler I'd like to ask you, if I may,
 24 about the quick guide we were looking at, the
 25 losses and gains quick guide. Perhaps we could

157

1 plans were in place to try and address this.

2 **Q.** One thing that it reveals is that, just like sub
 3 post offices, some Crown Offices were struggling
 4 to manage as what they must have seen as
 5 unexplained losses?

6 **A.** Potentially. Knowing what I know now, that is
 7 a potential, yes.

8 **Q.** So the figure there, if subpostmasters had come
 9 to know of it, was potentially quite an
 10 incendiary thing for them to find out about;
 11 would you see that?

12 **A.** I agree, yes.

13 **Q.** Do you have any knowledge of that document
 14 having been, as it were, sort of the leaked from
 15 Crown Offices to subpostmasters? Is that
 16 something that's ever come to your attention?

17 **A.** It's never come to my attention, but I would
 18 assume that it did get into the Crown Network.
 19 I can't recall instances of it happening, but
 20 anything that did get into the Crown Network
 21 ultimately, you could bet your bottom dollar,
 22 I guess, that it would get into the rest of the
 23 network.

24 **Q.** Did you ever hear of anyone -- I put this
 25 because Mr Lee Castleton received a copy of

159

1 have that come back up, it's POL00084076. If we
 2 go to Section 1 where the amount of loss was
 3 actually included, which is on page 3, that
 4 figure there of 2.2 million, how widely
 5 circulated had that been?

6 **A.** It was certainly a figure known by the business
 7 at Head Office. Obviously, it was a major
 8 factor on the General Manager for Crowns' score
 9 card. I'm not sure it would have been widely
 10 known within the Crown Network, which was the
 11 purpose of sharing best practice and letting
 12 individual managers and staff know that the
 13 business was losing its money. So, certainly
 14 within the Crown Network and above, at Head
 15 Office, it was a figure that was known, and with
 16 finance as well.

17 **Q.** When it was circulated to the Crown Network did
 18 it cause a bit of a buzz, if you like?

19 **A.** I think it was a shock to people because
 20 obviously we've very good branches out there
 21 that were incurring very small, if no losses
 22 whatsoever, and there were branches where they
 23 were haemorrhaging losses. So it was all about
 24 getting individual ownership on this figure and
 25 letting know the Network where we were, and what

158

1 this, and was told that he should never show it
 2 to anyone, and it was something that he should
 3 destroy because it was that incendiary -- is
 4 that the sort of thing that you've ever heard
 5 of?

6 **A.** No.

7 **MS PAGE:** Well, thank you. Those are my questions.

8 **SIR WYN WILLIAMS:** Thank you, Ms Page.
 9 Is that it, Ms Price?

10 **MS PRICE:** Yes, sir, it is. We're back on Tuesday
 11 at 10.00 for John Breeden.

12 **SIR WYN WILLIAMS:** Right. Well, before we formally
 13 close, Mr Pegler, thank you very much for
 14 providing a witness statement and for answering
 15 questions orally this afternoon. I'm grateful
 16 to you.

17 So we'll resume again at 10.00 on Tuesday
 18 morning.

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

20 **(2.48 pm)**

21 **(The hearing adjourned until the following**
 22 **Tuesday, 17 October 2023)**

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 24
 25

160

I N D E X

PAUL INWOOD (sworn)	1
Questioned by MR BLAKE	1
Questioned by MR STEIN	104
THOMAS ABRAHAM PEGLER (sworn)	118
Questioned by MS PRICE	118
Questioned by MS PAGE	157

	160/17	21/20 25/16 27/3 30/1	138/20 139/7 140/11	47/23 49/18 50/1 50/5
MR BLAKE: [18] 1/3	100 [1] 32/15	60/6 68/18 91/6	30 years [1] 2/4	50/17 50/23 53/5
1/6 1/10 65/22 66/1	11 [1] 137/2	125/23	31 years [1] 119/24	62/24 66/21 68/9
66/3 66/7 89/9 89/11	11 May [1] 40/22	2005 [2] 68/23	373 [1] 125/19	68/15 70/19 77/20
89/17 104/3 104/8	11.19 [1] 66/4	125/23	3rd [1] 139/9	77/21 77/22 80/11
104/13 115/3 115/7	11.35 [2] 66/1 66/6	2006 [1] 125/24		82/4 83/8 86/17 86/21
117/15 117/19 118/1	12 [4] 63/23 65/11	2007 [3] 124/16	4	90/13 92/15 92/16
MR STEIN: [4]	151/2 151/19	125/25 150/10	4.1 [1] 56/10	92/19 93/10 94/2 94/5
104/15 115/5 115/20	12 May [1] 118/25	2008 [10] 124/16	46 [3] 43/20 43/21	94/8 95/2 95/4 96/10
117/13	12.07 [1] 89/14	129/4 129/9 129/14	110/12	97/3 97/5 97/22
MS PAGE: [2]	12.15 [2] 89/11 89/16	130/3 130/18 142/18		101/24 103/8 104/19
157/22 160/7	12.50 [1] 118/2	146/2 149/6 150/11	5	104/25 104/25 105/7
MS PRICE: [8] 118/5	12VII [1] 151/18	2008/2009 [1] 43/1	50p [2] 142/23 144/7	106/1 107/21 108/8
118/8 118/18 118/21	13 October 2023 [1]	2009 [15] 27/8 27/10	53 per cent [1]	108/14 109/3 109/4
157/15 157/19 160/10	1/1	28/1 30/7 36/18 36/20	125/24	109/9 110/5 111/13
160/19	13,000/14,000 [1]	37/4 40/4 40/9 40/22		111/18 112/13 113/5
SIR WYN WILLIAMS:	48/16	41/15 43/1 43/16 48/9	6	113/20 113/24 115/24
[15] 1/5 65/25 66/2	14 [1] 69/11	83/20	6.4 [1] 149/8	116/12 116/18 117/2
104/7 104/9 115/12	14,000 [1] 48/16	2010 [6] 114/24	64 [2] 6/12 7/13	117/3 119/17 122/16
117/14 117/17 117/23	15 [2] 23/14 141/20	115/24 116/15 116/17	64.10 [2] 112/4 112/6	124/17 124/18 126/25
118/7 118/9 157/17	15 May [1] 1/17	117/1 156/19	64.8 [2] 110/13	127/23 132/11 133/14
157/20 160/8 160/12	15 members [1] 24/2	2011 [2] 2/19 131/6	110/17	142/11 145/24 147/17
THE WITNESS: [3]	16 [3] 141/18 141/21	2012 [1] 87/8	64.9 [2] 44/2 44/4	147/22 148/1 153/14
89/7 89/10 89/13	146/4	2013 [6] 52/10 55/18	6V [1] 155/1	157/24 158/23 159/10
'	17 [1] 105/25	77/16 154/18 155/3	6VI [1] 155/1	above [4] 58/20
	17 October 2023 [1]	155/16		133/2 137/23 158/14
	160/22	2014 [8] 74/3 77/17	7	ABRAHAM [3]
'14 [1] 50/3	18 [4] 42/25 59/13	89/20 99/4 99/11	71 [2] 63/16 63/21	118/19 118/23 161/9
'14/'15/'16 [1] 50/3	128/4 144/1	99/21 102/1 104/1		absolutely [6] 32/3
'15 [1] 50/3	19 [2] 70/1 147/21	2015 [2] 122/24	8	32/24 33/12 89/9
'16 [1] 50/3	1980 [1] 22/9	156/19	8.2 [1] 146/8	115/14 117/19
'3 [1] 127/15	1984 [1] 119/25	2017 [3] 55/8 55/16	8.9 [1] 147/22	accept [2] 14/1 23/6
'6 [1] 127/16	1986 [3] 120/5 120/7	55/20	9	acceptable [1]
'80s [2] 128/5 129/2	120/11	2017/18 [2] 42/25	92 [4] 69/10 69/11	146/19
'9 [1] 127/16	1990s [1] 93/5	59/13	80/19 80/21	acceptance [1]
'90s [9] 35/16 36/4	1997 [1] 122/6	2018 [17] 2/19 5/14	93 [3] 69/10 69/11	110/25
38/16 122/4 128/5	1998 [1] 122/19	6/4 9/19 13/19 16/18	69/15	access [11] 31/5
128/13 129/2 129/18	1999 [3] 126/25	20/11 29/20 40/5	95 [1] 69/22	32/4 106/4 113/14
155/10	127/1 127/2	40/10 47/18 102/1	96 [1] 69/25	113/22 114/12 115/15
'backdoor' [2] 106/4	2	103/25 104/1 106/17	98 [4] 105/24 105/25	117/6 138/12 147/7
113/14		111/20 114/2	108/1 113/24	147/8
'balance [1] 74/20	2,000 [2] 137/1	2023 [4] 1/1 1/17	A	accordance [1]
'in [1] 70/14	139/24	119/1 160/22	abbreviation [1] 9/15	135/12
'multi [1] 127/5	2.048 million [1]	21 [1] 144/25	ability [7] 31/2 31/11	account [15] 12/2
'multi-user' [1] 127/5	125/24	22 [1] 156/12	51/7 112/9 112/18	12/18 13/9 16/4 23/21
'old [1] 23/20	2.2 million [2] 150/11	23 [3] 20/23 20/25	113/5 131/4	33/16 35/11 36/2
'PMs' [1] 9/8	158/4	157/10	able [14] 6/13 17/10	41/25 58/4 59/23
'the [2] 30/15 39/16	2.48 [1] 160/20	24 April [1] 155/3	30/24 32/3 41/12	121/8 134/10 140/24
'victims' [1] 28/13	2.5m [1] 125/3	24 years [1] 22/4	55/23 71/15 77/14	151/2
0	20 [3] 74/3 119/3	249.99 [1] 136/24	79/17 79/25 82/12	accountants [1]
03 [1] 68/17	142/3	25 per cent [1]	91/12 117/24 131/13	108/11
1	20' [3] 127/15 127/16	125/25	about [111] 4/19 5/22	accounting [8] 26/25
1,000 [2] 48/19 48/24	127/17	250 [1] 136/25	6/18 6/24 7/15 13/5	30/13 67/5 73/23
1.393 million [1]	2000/2001/2002 [1]	27 August 2014 [1]	14/17 15/19 16/10	91/25 120/25 125/13
125/22	59/20	99/21	17/14 19/8 20/3 20/14	150/24
1.50 [2] 117/22 118/4	2000s [2] 122/4	28 [1] 106/1	20/21 24/3 25/18	accounts [23] 12/3
1.740 [1] 126/1	155/10	2nd [1] 138/23	29/17 29/18 30/5	12/19 13/21 17/24
10 [1] 115/4	2001 [1] 38/25	3	35/17 40/16 41/2 41/6	18/9 23/6 24/10 33/17
10 per cent [1] 82/24	2002 [5] 2/12 17/19	3.1 [2] 56/11 56/16	41/16 41/23 42/9	33/24 46/12 46/15
10 years [1] 99/12	30/1 59/20 60/6	3.13 [1] 88/5	42/16 42/22 43/3	46/16 49/8 59/22
10-year [2] 40/9 40/9	2002/03 [1] 68/17	3.2 [1] 54/17	43/15 44/9 44/16	66/20 78/16 112/11
10.00 [3] 1/2 160/11	2003 [1] 125/22	3.3 [1] 87/23	45/17 45/24 46/2	112/21 116/13 119/23
	2003/2004 [1] 91/6	30 [5] 133/6 137/25		121/1 136/5 145/6
	2004 [10] 2/12 17/19			accurate [2] 32/15

A	66/11 66/11 67/21 68/17 70/9 70/21 71/2 71/10 71/24 72/16 72/22 74/25 76/14 76/15 78/4 78/6 78/10 78/24 79/25 81/6 82/7 83/23 85/8 87/6 89/21 91/2 91/19 92/1 92/10 93/17 95/19 96/19 96/25 97/12 97/13 97/19 97/23 98/7 99/22 100/15 100/18 102/20 105/19 106/9 111/2 111/6 113/10 113/16 114/6 115/1 117/7 119/15 120/3 120/10 121/3 121/11 121/22 122/13 122/14 123/3 123/21 123/24 123/25 124/3 124/11 124/23 126/14 127/13 127/13 128/21 129/22 130/15 131/2 131/9 131/17 131/17 132/18 132/18 132/19 138/7 138/11 139/16 143/16 143/19 143/19 145/23 145/23 146/8 147/6 147/8 147/19 149/11 149/18 149/20 150/1 153/6 153/18 153/25 154/3 158/16 159/4 159/4 159/14	35/25 57/10 58/15 59/18 64/8 66/16 67/24 76/14 81/12 85/1 89/22 90/8 93/21 93/21 94/17 95/14 96/21 98/22 103/15 119/13 assistant [4] 2/9 71/5 120/13 133/8 assistants [3] 61/4 64/5 131/9 assisted [3] 22/8 72/20 80/15 assisting [1] 124/20 assists [1] 126/24 associate [2] 5/18 93/9 assume [1] 159/18 assumed [1] 24/21 assumption [1] 155/8 Assurance [1] 52/15 assured [1] 107/10 astray [1] 33/6 at [209] attached [3] 146/17 146/19 147/15 attempt [2] 18/2 18/8 attempts [1] 65/3 attend [5] 69/5 69/6 70/3 71/9 72/10 attendance [1] 22/23 attended [2] 33/25 67/9 attending [2] 71/24 72/15 attention [5] 41/22 107/14 108/16 159/16 159/17 audit [16] 17/8 31/20 39/6 49/11 50/9 66/18 68/10 79/8 79/9 79/12 87/16 133/17 153/18 153/24 154/5 154/16 audited [1] 153/17 auditing [1] 154/8 auditors [2] 66/20 68/4 audits [2] 42/10 153/19 August [1] 99/21 author [2] 83/21 83/23 authored [1] 84/3 authorisation [2] 43/11 55/15 authorise [1] 50/8 authorised [4] 42/12 55/18 55/19 55/20 authority [2] 92/9 147/4 automated [3] 12/4 13/9 145/11 automation [8] 6/22	7/19 8/12 8/16 12/15 12/23 12/25 132/20 avoid [2] 84/9 85/12 aware [28] 22/11 22/24 23/15 27/3 47/24 68/13 83/2 97/11 97/24 99/16 105/2 106/14 106/20 107/3 108/1 108/15 108/18 108/24 109/19 112/16 115/25 116/8 116/16 116/21 145/24 149/3 154/9 156/11 awareness [6] 127/10 134/22 138/13 140/14 141/23 142/11 away [1] 142/4 awkward [1] 19/20	base [2] 126/6 126/7 based [12] 10/12 21/4 22/5 39/14 43/7 67/13 67/18 105/16 117/9 122/18 138/2 145/10 basically [7] 121/3 121/5 125/13 132/20 137/16 143/21 149/17 basics [1] 126/17 basis [12] 15/13 15/22 50/1 50/9 74/20 74/22 86/12 86/16 88/10 93/19 132/19 134/21 Bates [1] 65/5 BDM [1] 94/12 be [197] Beal [1] 4/8 bear [1] 135/1 became [7] 2/10 36/10 37/18 49/5 120/5 144/9 154/10 because [69] 3/6 7/10 7/21 8/14 9/6 9/8 11/1 11/17 12/7 12/8 12/15 15/18 18/23 19/9 24/8 25/21 28/16 28/19 28/25 29/1 33/6 35/20 37/7 38/23 41/4 42/17 45/3 45/8 46/9 48/14 49/9 52/18 57/3 59/6 59/14 60/3 65/11 67/14 68/23 71/13 72/7 72/13 72/17 74/10 75/21 76/16 76/24 79/14 79/24 86/11 86/25 92/10 92/24 97/17 98/3 98/9 100/6 104/9 116/22 117/7 130/12 130/22 133/11 137/19 150/3 154/1 158/19 159/25 160/3 become [2] 123/20 152/23 becoming [1] 35/3 bed [1] 98/10 bedded [1] 153/5 been [99] 10/9 13/6 14/16 17/9 18/18 18/19 20/14 21/17 21/19 22/23 22/24 23/14 24/9 24/15 28/13 30/17 31/15 34/6 37/9 39/4 39/7 39/9 41/17 43/4 48/8 50/7 53/7 53/15 57/3 58/4 62/1 62/22 67/1 67/18 67/20 67/20 68/22 68/23 70/13 74/16 74/19 75/24 75/24 76/6 77/25 78/2 78/7 78/10 78/17
----------	---	--	--	---

B	bespoke [1] 124/4 best [8] 1/21 37/11 38/15 119/9 141/24 142/11 147/12 158/11 bet [1] 159/21 better [4] 52/7 75/7 121/18 128/11 between [32] 2/12 6/7 6/17 31/9 33/3 51/15 51/20 52/1 53/2 56/10 57/3 61/15 65/15 72/4 72/18 74/13 75/9 77/23 78/1 81/16 92/11 97/15 104/1 121/14 121/16 132/13 145/18 145/25 152/2 152/8 153/20 154/16 beyond [6] 19/5 58/24 75/1 75/11 110/3 110/3 big [1] 128/19 bigger [1] 48/25 biggest [2] 19/15 126/4 bimonthly [1] 49/25 binary [1] 77/1 bit [15] 3/21 20/20 22/19 37/10 51/19 54/1 75/8 99/24 104/24 123/24 136/15 136/25 153/13 155/22 158/18 BLAKE [7] 1/9 104/7 104/19 105/6 109/7 117/18 161/5 blamed [1] 102/24 blanket [1] 100/18 bloke [1] 113/6 blue [1] 157/7 BM's [2] 9/8 9/15 board [1] 157/4 Bogerd [1] 90/2 bold [1] 133/15 Bond [5] 5/11 5/18 6/20 43/19 93/10 bonds [1] 139/24 booklets [1] 135/13 both [6] 20/4 57/7 58/12 64/15 79/4 131/16 bottom [20] 13/22 14/15 21/25 22/1 27/10 42/6 43/21 46/10 52/14 55/23 73/6 80/1 80/21 84/5 112/4 135/9 137/1 144/25 146/5 159/21 bought [1] 108/16 branch [78] 2/7 2/9 9/1 9/9 9/15 9/17 11/24 21/15 24/14 24/24 34/9 49/11 54/6 56/6 88/2 91/16 91/24	93/4 93/10 93/11 94/16 112/11 116/3 116/13 119/23 120/14 120/25 121/3 121/7 121/13 127/8 127/10 128/18 130/23 132/1 132/5 132/7 132/16 132/24 133/1 133/3 133/9 134/2 135/9 135/11 135/12 135/14 135/17 135/20 135/21 135/24 138/1 144/12 145/11 148/21 149/12 149/14 149/21 149/23 150/2 150/24 151/1 151/2 151/15 151/23 152/7 152/12 152/25 153/4 153/8 153/10 153/22 154/2 155/21 155/24 156/1 156/3 156/23 branch's [1] 121/1 branches [18] 35/11 53/24 54/22 116/2 116/9 123/2 123/3 123/6 123/12 123/16 128/15 132/9 150/15 150/16 153/17 154/8 158/20 158/22 brand [1] 88/3 breach [10] 15/19 67/1 67/2 67/18 70/22 73/21 75/25 76/15 87/7 89/22 breaches [4] 73/22 74/11 74/12 78/6 bread [1] 62/18 break [6] 63/14 65/24 66/5 89/8 89/11 89/15 breaking [1] 118/11 Breeden [2] 49/22 160/11 brief [1] 137/17 Briefing [1] 99/7 briefly [5] 2/22 27/23 87/13 89/22 131/24 brilliant [4] 9/13 9/18 9/20 10/11 bring [6] 20/19 52/9 55/3 55/7 100/25 131/5 bringing [2] 135/1 155/17 British [1] 92/1 broad [1] 75/22 broader [2] 76/10 76/21 broadly [1] 17/6 Brooks [3] 5/17 6/19 93/9 brought [5] 41/22 107/13 107/15 124/5 149/15 budgets [1] 38/18	bug [7] 31/24 32/2 116/2 116/2 116/8 116/25 116/25 bugs [17] 13/16 45/17 47/16 51/2 51/8 63/9 75/18 78/1 78/10 90/14 110/20 111/14 113/2 117/3 117/5 156/13 157/5 built [1] 144/6 bullet [16] 56/14 56/16 57/23 60/10 61/6 62/2 62/4 64/9 64/10 64/22 65/3 65/15 133/20 147/19 147/23 148/9 bunch [1] 5/22 bundle [2] 19/10 29/22 burden [1] 97/18 bus [1] 134/15 business [37] 3/17 13/4 27/2 28/4 35/21 36/6 36/9 46/4 46/5 62/18 84/23 85/3 85/4 85/18 86/17 109/15 109/23 110/6 110/8 122/11 122/16 123/17 125/6 126/5 126/21 128/21 130/20 131/16 142/7 145/17 145/20 154/6 155/16 156/15 156/17 158/6 158/13 busy [1] 9/9 but [93] 3/23 4/2 4/12 4/12 7/25 8/17 9/12 10/2 10/6 10/8 11/7 12/4 13/8 13/20 14/10 15/15 16/2 17/5 17/17 17/22 19/6 19/9 19/24 21/9 23/18 25/24 26/12 30/7 30/10 31/11 42/13 53/5 55/9 56/16 56/16 58/12 59/14 60/17 61/13 62/7 63/8 64/9 68/19 68/22 70/10 71/3 72/15 73/21 78/16 79/18 80/6 83/4 86/24 91/1 91/8 97/4 98/15 99/11 99/17 101/15 107/20 108/25 109/18 112/17 114/21 115/3 115/10 115/13 116/5 120/20 123/11 124/3 126/8 126/21 129/19 129/21 132/20 132/23 132/25 135/25 136/5 136/10 143/24 145/13 147/2 151/6 153/13 154/14 155/4 156/2 157/6 159/17 159/19 butter [1] 62/18 button [3] 7/11 11/1	14/7 buyer [1] 85/22 buying [1] 86/17 buzz [1] 158/18
C				
	calculate [1] 14/7 calculation [1] 112/10 calculator [11] 7/25 8/6 8/8 8/17 14/24 16/20 32/13 32/17 32/20 50/18 102/3 calendar [1] 135/24 call [3] 98/14 118/8 118/17 called [10] 5/17 21/7 52/13 55/11 55/12 68/9 91/18 93/9 93/11 116/1 came [11] 5/10 6/15 8/22 25/25 40/13 105/3 139/23 142/10 150/1 157/3 157/3 campaign [3] 40/12 40/14 107/8 can [93] 1/3 1/5 1/10 2/22 3/25 4/6 4/21 4/24 5/6 5/9 6/12 8/17 8/19 9/18 17/3 18/22 18/23 19/9 19/15 20/19 20/23 21/11 23/2 27/7 27/8 27/10 27/16 29/11 32/21 34/20 35/6 35/25 45/21 51/24 57/10 58/15 61/11 62/9 62/24 63/1 65/11 66/16 67/24 73/2 73/13 76/12 78/13 81/12 83/3 83/19 85/1 87/8 87/13 87/23 89/5 89/11 89/22 90/25 91/5 91/24 93/7 93/21 94/3 94/12 96/10 96/14 99/2 100/24 103/15 103/22 104/7 104/8 110/10 114/23 115/9 115/11 115/20 115/23 116/12 118/5 118/7 118/17 121/24 125/4 125/21 128/6 130/9 136/16 142/25 143/19 148/2 148/10 151/18 can't [18] 5/1 19/12 30/10 32/21 40/17 61/21 62/7 80/4 83/5 92/8 96/13 98/2 98/4 99/14 104/10 117/25 130/10 159/19 cannot [1] 112/17 capability [5] 22/15 25/22 26/4 26/21			

C	cc [1] 29/5 cc'd [1] 27/20 cease [1] 88/7 cent [3] 82/24 125/24 125/25 central [2] 37/18 38/4 centrally [2] 132/10 155/17 certain [9] 6/25 31/23 38/18 48/18 68/24 105/15 148/19 153/23 156/1 certainly [7] 25/3 29/24 30/19 99/14 144/20 158/6 158/13 certificate [3] 131/23 132/1 154/13 cetera [8] 6/25 49/16 50/18 59/20 84/25 86/3 102/4 102/4 chain [4] 27/9 99/25 110/2 120/7 chains [2] 100/17 101/15 challenge [2] 28/4 153/1 challenges [1] 34/16 change [16] 3/18 21/5 24/11 35/20 37/21 38/11 42/3 43/5 50/7 50/8 50/24 57/1 84/6 110/8 154/18 155/7 changed [1] 19/25 changes [1] 42/11 charge [5] 38/8 49/23 49/23 67/3 67/4 charges [4] 67/12 71/16 74/24 75/7 check [9] 10/8 132/21 132/25 133/5 133/10 133/19 134/1 134/18 151/23 checks [11] 127/12 132/12 132/13 132/14 132/15 132/17 133/4 136/13 147/6 153/23 154/14 Chesterfield [2] 120/25 150/22 children [1] 8/19 Christmas [2] 9/8 9/25 circulate [1] 53/10 circulated [2] 158/5 158/17 circulation [1] 53/12 circumstances [10] 5/10 63/1 63/5 68/6 76/9 82/12 146/24 148/11 148/16 148/25 civil [11] 73/1 75/2 75/10 90/19 90/23 95/7 97/1 97/6 97/16 97/23 98/3 claim [1] 34/19 claimants [4] 43/24 44/20 110/23 112/8 claimed [1] 19/1 claims [1] 19/3 clear [9] 30/7 33/20 51/10 54/18 58/22 109/2 127/9 131/7 150/22 clearly [10] 13/22 14/14 17/21 24/8 47/4 53/21 85/17 94/25 99/16 103/1 clerk [2] 120/5 120/11 client [1] 72/17 clients [1] 3/6 close [2] 26/18 160/13 closely [2] 93/25 130/21 closer [4] 3/22 3/24 35/13 59/23 closing [1] 123/22 clunky [1] 51/19 CMA [1] 137/9 code [3] 141/16 141/25 142/14 cognisant [1] 63/4 collaboration [1] 128/10 collating [1] 122/15 colleague [4] 9/11 134/17 148/1 152/4 colleagues [9] 8/23 24/16 24/24 138/11 139/2 139/10 146/12 146/16 151/22 come [25] 3/22 4/22 5/2 8/11 14/4 16/22 19/13 25/24 32/19 56/8 60/23 65/14 66/1 93/22 94/12 97/3 97/5 117/21 129/8 143/7 148/19 158/1 159/8 159/16 159/17 comes [1] 93/15 comfort [2] 89/8 100/18 coming [10] 13/3 17/3 21/23 48/2 50/11 119/12 125/10 126/9 130/17 156/17 command [1] 110/2 comment [6] 10/11 11/21 53/15 100/7 112/13 112/17 commented [1] 149/7 commenting [1] 99/25 comments [1] 40/4 commercial [1] 48/1	commercially [3] 45/2 45/11 45/14 commitment [1] 131/19 common [1] 100/16 communicate [3] 44/4 70/24 110/19 communicated [1] 42/5 communicating [2] 44/15 84/11 communication [3] 24/19 70/12 70/19 Communications [1] 156/21 communities [2] 42/19 77/14 community [4] 17/15 57/15 63/15 90/6 companies [2] 15/9 15/13 company [37] 3/1 5/23 16/7 16/23 17/5 21/5 26/3 40/15 42/9 42/13 42/20 45/5 46/18 47/7 47/22 49/9 50/4 51/12 54/3 68/25 69/1 72/18 75/22 76/3 77/12 78/18 81/25 95/13 102/10 102/16 103/1 105/7 105/10 114/16 114/18 117/7 124/2 compare [3] 7/6 10/22 31/23 compared [3] 48/21 49/7 145/14 comparison [1] 16/7 complaining [1] 24/3 complaint [7] 19/8 20/12 29/16 29/25 39/23 46/7 48/10 complaints [13] 13/19 13/20 18/10 22/12 24/4 25/17 25/19 29/19 35/2 41/2 48/7 48/20 77/21 complete [2] 66/21 148/4 completed [6] 9/23 11/22 18/16 91/12 106/23 121/10 completely [6] 17/21 18/4 47/22 97/18 111/21 116/6 compliance [5] 131/23 132/3 146/7 154/11 154/14 complicated [1] 8/21 Computer [5] 40/21 41/16 41/20 41/24 77/19 conceal [3] 44/5 110/20 112/8	concern [13] 42/8 42/16 43/14 50/4 76/17 77/11 106/9 113/16 114/6 118/10 124/9 124/25 145/23 concerned [2] 42/22 75/22 concerning [1] 45/1 concerns [13] 22/12 43/3 95/2 104/22 106/14 106/20 107/3 107/13 108/2 108/7 108/12 108/19 108/21 concession [1] 85/19 conclusion [4] 79/7 103/19 117/11 127/22 conduct [4] 141/16 141/25 142/14 153/23 conducted [1] 136/14 conducting [3] 78/23 79/5 126/18 confidence [5] 70/9 70/11 71/1 73/8 148/4 confidence' [1] 70/15 confidential [1] 148/8 confidentiality [3] 45/1 45/13 47/25 confirm [3] 118/21 133/22 151/25 confirming [1] 152/7 conflation [1] 75/9 confusion [3] 62/9 62/25 65/20 conjunction [1] 134/23 connected [1] 26/25 connection [2] 6/7 70/18 consequences [1] 141/8 consider [6] 15/12 39/13 74/8 78/3 87/25 141/15 considerable [3] 33/15 72/8 124/25 consideration [7] 34/20 73/19 75/18 88/18 129/10 138/16 143/25 considered [6] 9/20 16/20 34/19 37/4 143/16 148/15 considering [1] 142/13 consistent [4] 25/11 34/15 54/19 131/8 consistently [1] 127/19 constitute [1] 70/21 consultation [1] 81/9 consulted [1] 95/4 contact [6] 81/24
----------	---	--	---

C contact... [5] 90/20 91/7 93/23 148/4 157/1 contacted [1] 28/15 contained [2] 101/23 121/1 content [1] 52/19 contents [4] 105/2 119/8 124/15 149/17 context [7] 11/22 30/4 45/22 85/2 95/6 97/20 98/3 contingency [1] 132/6 continue [1] 36/8 continuity [1] 76/4 contract [49] 3/14 4/10 6/15 15/19 23/23 41/1 48/7 54/15 57/4 57/11 57/20 57/21 57/25 58/7 58/9 58/21 58/24 59/7 62/4 62/6 62/20 63/4 63/15 65/19 67/2 67/18 69/2 69/9 73/21 74/12 74/13 75/25 76/15 77/6 78/6 80/18 83/18 85/14 85/15 85/23 86/12 86/22 86/24 87/6 89/21 116/24 123/12 143/24 145/6 contracts [63] 2/12 2/17 2/19 3/12 3/13 3/15 4/13 4/14 17/7 17/19 21/20 21/24 24/7 26/20 29/16 34/20 48/17 49/24 51/16 51/20 52/2 57/12 57/14 57/16 58/5 59/3 59/15 60/5 61/16 61/17 61/20 61/24 62/17 64/13 64/14 64/24 65/2 66/11 67/16 68/3 68/14 68/17 71/7 71/18 72/22 72/25 73/17 76/6 76/11 76/18 76/20 82/17 83/7 83/9 84/7 90/5 91/6 94/13 97/8 97/12 108/13 117/8 123/7 contractual [13] 56/1 56/5 57/7 58/16 58/18 58/23 59/6 60/22 78/11 81/15 91/11 95/5 116/20 contractually [1] 65/8 contrary [1] 13/13 contrast [1] 123/10 control [3] 38/17 134/21 154/15	controlling [1] 135/6 controls [2] 127/3 131/16 conversation [4] 20/17 29/20 51/9 100/20 conversationally [1] 111/2 conversations [5] 17/12 28/7 52/6 101/11 103/20 converting [1] 123/23 cope [1] 25/20 copied [6] 28/17 28/23 94/4 98/23 100/16 101/14 copy [6] 68/2 68/7 99/22 118/24 119/6 159/25 corporate [1] 17/16 correct [22] 2/8 2/14 2/15 5/19 6/6 21/3 29/6 29/10 33/10 58/11 66/15 87/22 88/14 92/5 104/2 106/18 120/2 120/12 122/7 122/21 123/14 147/7 correction [2] 14/3 34/17 corrections [2] 33/8 136/16 correctly [1] 120/23 correspondence [4] 24/21 24/25 48/9 77/20 corridor [4] 105/8 105/9 107/14 108/6 corridors [1] 105/19 could [98] 3/21 3/22 7/13 7/15 12/20 13/22 14/10 17/19 21/1 21/6 21/25 23/11 23/22 26/6 27/1 30/6 30/8 31/4 31/5 31/23 32/1 33/6 33/7 33/13 41/13 43/12 45/4 45/10 45/14 49/12 50/8 52/15 54/16 55/2 55/5 55/7 55/22 55/24 56/2 59/2 59/7 62/25 66/1 67/5 69/4 69/6 69/10 71/5 71/5 71/9 76/6 80/18 80/21 85/21 96/16 99/20 99/24 100/19 101/15 108/11 109/24 110/14 112/20 116/8 117/11 117/21 118/21 120/16 122/3 124/1 124/13 129/23 130/3 130/25 131/24 132/4 132/23 133/12 135/24 137/4 137/19	137/22 138/3 140/5 141/19 141/24 144/1 144/7 144/15 146/2 147/15 148/17 149/9 150/5 152/3 153/17 157/25 159/21 couldn't [7] 15/6 18/19 29/19 32/24 33/21 116/4 139/20 Counsel [3] 101/19 102/16 102/25 count [1] 34/1 counter [11] 9/11 120/5 120/10 120/21 125/1 125/21 126/11 127/4 132/22 136/19 151/22 Counters [1] 120/10 country [3] 49/2 49/4 94/14 course [9] 2/2 19/4 25/24 47/7 81/18 81/20 91/13 115/18 152/5 court [2] 92/4 92/20 cover [1] 143/12 covered [2] 123/2 130/13 covers [1] 131/23 Craig [3] 4/11 49/22 52/3 crash [1] 17/18 crashing [1] 18/7 Crichton [2] 101/19 102/17 criminal [17] 69/17 70/2 72/23 75/5 90/18 90/22 90/24 90/25 91/8 91/14 95/10 97/2 97/4 97/17 97/22 98/1 98/14 criteria [1] 133/7 critical [1] 101/24 cross [1] 97/21 Crown [75] 2/7 8/13 12/16 12/22 13/6 28/21 91/16 120/19 121/15 121/25 122/18 122/23 123/2 123/2 123/6 123/16 123/18 124/8 124/14 125/1 125/3 125/17 126/3 127/5 128/3 128/16 130/2 131/3 131/8 131/12 131/20 133/17 133/18 135/4 136/1 138/10 138/23 139/10 141/5 141/14 141/22 142/10 142/16 142/20 143/1 143/8 143/11 143/17 144/5 144/10 144/23 145/15 146/2 146/10 147/5 147/25 150/10 150/15 150/16	151/15 152/25 153/15 153/17 153/19 153/25 154/8 154/16 154/23 158/10 158/14 158/17 159/3 159/15 159/18 159/20 Crowns [4] 135/23 136/10 151/8 154/5 Crowns' [1] 158/8 culpability [1] 75/7 culpable [1] 73/20 culture [10] 34/24 35/5 35/7 36/15 36/21 37/3 37/5 37/5 38/21 126/21 current [1] 3/7 currently [1] 84/18 custody [1] 81/9 custom [3] 71/6 71/17 71/22 customer [5] 7/12 11/3 11/7 11/15 128/20 customers [2] 2/7 88/4 cut [1] 38/22 CWU [1] 137/8 cycle [3] 3/3 26/24 58/2 D daily [2] 134/3 134/13 data [20] 15/13 15/22 17/19 18/6 31/25 33/3 33/5 33/6 45/1 45/13 47/25 49/3 68/10 68/10 79/8 79/10 79/18 112/9 124/20 127/14 date [3] 89/4 120/8 124/15 dated [5] 1/16 89/5 118/25 129/9 155/3 dates [1] 2/21 day [11] 3/2 3/2 4/15 4/15 10/8 10/10 22/7 32/8 132/23 148/20 152/8 days [4] 30/5 34/22 59/19 137/10 deal [12] 4/14 26/4 48/15 48/18 65/4 76/15 82/10 90/13 92/15 92/16 109/24 144/25 dealing [6] 46/6 72/9 74/11 78/5 140/3 143/17 deals [2] 136/19 143/7 dealt [2] 23/18 72/24 Dear [1] 29/14 death [1] 3/4	debt [16] 35/4 47/11 50/21 51/4 51/4 51/10 51/22 52/13 53/23 54/10 54/21 55/12 55/13 62/24 63/2 63/6 debt/integrity [1] 35/4 debts [3] 30/14 51/12 62/19 decide [1] 152/11 decided [3] 128/1 136/10 139/20 decision [6] 67/19 72/20 76/14 84/12 123/17 148/13 decisions [1] 36/24 declaration [2] 10/7 133/25 declare [1] 136/12 declared [5] 132/18 144/10 144/21 144/22 152/18 declaring [1] 144/16 deemed [1] 125/14 deems [1] 88/2 default [1] 146/22 defect [2] 31/25 32/2 defects [12] 13/17 45/17 47/16 51/8 63/9 75/19 78/2 90/15 105/13 105/20 156/13 157/6 defence [1] 71/16 Deficiencies [1] 64/6 deficits [2] 28/9 28/11 defined [1] 127/9 defines [1] 54/1 defraud [1] 45/5 delay [7] 56/11 56/13 56/21 56/24 60/13 60/14 64/7 deliver [2] 131/5 131/21 delivered [3] 26/10 153/6 157/12 delivery [1] 121/6 demand [1] 3/5 demonstrated [1] 107/23 den [1] 90/2 department [2] 28/4 46/17 departments [1] 128/8 departure [2] 6/10 102/21 depend [1] 68/6 depended [1] 112/12 dependent [1] 152/6 depending [2] 144/21 152/10 deploy [2] 127/14 131/20
---	--	---	---	---

D	105/12 106/9 107/25 109/20 111/4 113/16 113/23 114/6 114/9 123/20 128/24 132/19 135/25 136/9 145/23 148/19 148/19 154/25 155/6 158/17 159/18 159/20 159/24 didn't [23] 13/20 14/13 15/16 38/13 41/4 42/13 48/11 48/21 49/1 50/24 52/19 59/13 79/14 101/16 102/6 108/23 109/8 110/4 113/5 121/19 128/9 154/4 154/24 differed [1] 128/13 difference [13] 56/10 56/17 56/19 60/17 61/15 92/11 121/16 121/18 121/20 121/21 132/13 145/16 145/24 differences [1] 121/14 different [27] 2/16 4/23 9/12 24/7 49/20 54/15 57/11 57/19 57/24 63/17 66/8 69/16 73/15 84/17 85/4 86/6 86/10 90/17 91/1 97/19 100/8 115/21 136/21 136/21 145/13 150/7 155/15 differentiation [2] 72/3 145/18 differently [2] 41/10 64/21 difficult [10] 17/13 48/23 68/20 71/14 80/11 99/10 103/23 117/10 143/22 148/3 difficulties [4] 20/21 24/3 26/1 105/13 difficulty [3] 6/24 13/15 75/3 diligence [1] 78/17 direct [8] 34/8 35/9 35/14 35/22 36/2 95/24 96/1 96/3 directed [1] 103/11 directing [1] 103/13 directly [14] 6/22 7/19 13/20 18/18 40/12 60/4 91/20 92/25 108/16 109/14 109/22 123/3 128/15 145/21 Director [1] 43/9 disciplinary [3] 135/1 141/15 142/13 disciplined [1] 23/23 disclosed [1] 18/23 disclosure [1] 67/25	discovered [1] 142/21 discovery [1] 119/22 discrepancies [16] 8/16 13/21 13/23 13/23 14/2 17/8 17/24 23/6 31/21 34/4 44/7 45/25 47/15 49/14 134/22 156/10 discrepancy [22] 14/14 18/18 19/1 23/17 23/20 34/10 39/5 39/7 39/9 39/10 46/15 66/19 66/20 78/9 78/15 79/21 87/16 112/11 151/16 152/2 152/15 153/1 discrete [2] 59/17 89/19 discretion [4] 38/13 38/17 58/20 109/9 discuss [1] 82/12 discussed [5] 17/6 82/2 105/5 105/18 113/3 discussing [5] 101/8 104/18 109/7 116/1 129/7 discussion [11] 20/11 49/18 92/21 93/8 96/10 105/6 107/16 110/18 126/2 137/8 149/19 discussions [5] 102/7 103/3 103/18 107/14 108/7 dishonest [1] 111/21 disjoins [1] 51/25 disks [2] 120/24 121/23 dismayed [1] 23/22 dismissive [3] 40/16 102/11 108/8 display [1] 155/4 dispute [4] 46/10 81/16 95/13 97/1 disputes [2] 66/9 66/12 disquiet [1] 107/21 distinction [1] 86/16 distribution [3] 100/2 100/11 101/2 do [99] 8/22 9/6 9/11 10/7 15/20 15/22 15/24 16/4 18/6 19/19 20/25 21/2 24/4 24/25 25/2 25/16 25/22 27/12 27/24 28/20 28/21 28/22 29/2 31/13 32/1 38/14 38/18 38/19 39/22 40/2 42/21 43/24 44/18 45/3 45/8 45/8 46/4 46/24 47/19	48/11 50/13 51/17 51/18 51/22 56/19 57/1 58/17 59/18 65/13 69/17 71/5 72/12 74/1 74/15 74/21 75/3 75/14 77/25 79/8 79/25 82/7 82/15 83/23 84/2 84/22 87/19 91/25 93/1 95/8 95/16 99/8 100/9 100/21 104/6 109/21 111/4 111/6 111/7 112/17 112/18 112/21 113/5 115/9 115/10 116/18 119/1 119/6 119/7 135/21 136/4 136/10 137/7 143/5 148/22 150/11 151/16 153/13 157/6 159/13 document [63] 4/22 4/24 5/8 43/23 44/19 52/9 56/20 56/21 56/23 62/23 62/24 63/3 65/3 65/18 73/3 84/1 85/5 85/10 86/3 86/23 89/3 89/5 92/2 98/24 110/11 114/20 114/24 114/24 115/4 115/9 115/21 115/23 115/24 116/11 124/14 124/21 124/23 126/24 127/19 129/7 129/9 129/11 130/4 130/7 130/10 130/13 130/15 130/25 133/14 137/2 141/21 142/8 143/4 146/5 147/21 149/7 149/9 149/12 149/25 150/5 150/13 155/5 159/13 documentary [1] 39/15 documentation [4] 98/21 98/23 122/16 150/20 documents [8] 29/21 30/7 31/9 31/24 91/1 91/4 93/6 135/16 does [19] 14/25 16/22 21/17 29/7 52/16 64/8 64/15 64/20 70/5 81/3 90/8 93/21 94/17 95/14 96/21 98/22 99/5 124/16 150/22 doesn't [10] 10/14 25/14 37/22 46/3 56/21 56/24 64/15 71/2 117/4 136/22 doing [3] 12/19 62/21 132/25 dollar [1] 159/21 domain [2] 16/12	18/14 don't [30] 20/5 23/4 24/7 26/17 27/25 31/2 31/17 51/25 56/15 59/9 59/25 69/15 72/3 77/23 79/17 79/20 89/5 90/22 92/21 97/2 97/14 99/10 104/4 105/4 109/14 109/22 114/21 126/14 143/24 157/6 done [3] 41/10 53/1 74/13 door [2] 116/15 125/12 doubt [3] 75/1 75/11 113/2 down [30] 5/16 6/18 7/16 20/16 21/25 50/7 52/15 53/25 54/2 56/2 59/11 65/14 76/12 93/11 94/8 96/17 99/24 107/25 111/1 115/23 118/11 121/22 126/25 127/23 132/11 133/14 136/16 137/1 147/22 151/21 draft [3] 73/8 73/10 99/17 drafted [9] 50/20 52/22 73/4 73/9 73/10 73/11 74/2 75/13 75/17 drafting [8] 26/14 39/25 51/3 52/23 53/4 61/25 74/9 89/2 draw [1] 67/16 drive [3] 50/11 94/6 94/15 driven [2] 76/10 77/8 driver [2] 76/19 76/22 due [12] 2/2 7/12 11/2 25/24 30/13 64/6 110/25 118/10 125/1 127/20 127/25 153/15 during [19] 4/7 10/10 19/4 21/4 23/17 29/20 34/6 48/7 49/21 59/25 65/9 68/1 68/13 68/20 78/3 88/6 106/1 113/12 115/18 duties [1] 92/19 duty [3] 132/7 132/17 148/2
----------	---	--	--	---

E	employed [3] 120/19 123/7 123/11	escalation [11] 127/14 137/3 137/5 138/5 138/14 140/16 141/7 141/9 141/17 141/22 155/19	92/19 95/16 97/9 97/25 100/12 124/2 130/16 136/7 139/22 144/22 147/13 154/13	132/5
early [10] 4/20 25/17 30/5 36/4 59/19 122/4 124/16 128/7 137/10 155/10	employee [3] 33/25 91/17 142/12	especially [1] 148/3	examples [15] 4/6 16/15 18/4 18/5 18/17 18/20 18/22 37/25 41/9 41/14 45/6 98/2 106/25 107/23 108/15	extra [1] 22/19 extreme [1] 115/18 extremely [2] 32/17 60/8
ears [1] 153/12	employees [7] 119/22 142/20 143/2 143/8 143/12 143/21 145/15	essentials [4] 84/18 85/6 86/8 86/11	Excel [1] 138/2	eye [1] 137/18
easily [1] 12/20	employment [2] 116/7 123/7	establishing [1] 142/12	Excel-based [1] 138/2	eyes [3] 133/8 133/12 153/12
East [4] 2/13 21/21 24/6 48/19	encountered [2] 9/22 137/22	estate [9] 6/23 7/20 8/13 12/16 12/22 13/1 13/6 91/17 131/4	except [1] 60/5	F
Eastbourne [1] 21/15	encourage [1] 45/15	et [8] 6/25 49/16 50/18 59/20 84/25 86/3 102/4 102/4	excepting [1] 22/4	face [5] 35/14 35/14 35/22 35/22 79/12
eastern [2] 2/13 21/21	end [11] 6/15 9/23 10/7 11/17 21/23 32/5 68/18 116/12 137/19 153/10 156/18	et cetera [7] 6/25 49/16 50/18 84/25 86/3 102/4 102/4	exception [1] 23/12	faced [1] 153/4
ECCO [6] 120/16 120/17 120/18 121/4 121/14 121/17	ended [1] 122/1	etc [1] 134/16	exchange [4] 18/25 19/10 40/23 41/15	fact [23] 14/6 34/22 60/14 62/1 63/2 65/12 77/8 77/15 95/2 98/16 103/21 105/6 105/10 108/5 108/14 109/1 109/7 116/5 116/12 116/25 118/10 121/21 154/2
effect [3] 28/8 116/9 131/4	endgame [1] 155/24	ethos [2] 113/1 117/3	exclusively [1] 73/22	factor [2] 128/20 158/8
effectively [10] 8/5 37/23 81/7 125/10 131/13 132/24 136/3 136/9 136/11 137/9	enforce [1] 143/23	evacuation [1] 132/6	ExCo [3] 4/5 50/14 103/14	factors [4] 76/13 76/13 77/7 127/20
efficiency [4] 12/22 13/4 35/21 122/19	engineers [4] 106/4 113/13 113/21 114/12	evaluate [1] 66/25	Excursionary [1] 92/2	facts [1] 79/6
efficient [1] 52/8	England [2] 2/14 21/21	evaluation [1] 67/21	excuse [1] 61/14	failure [1] 33/7
eg [4] 84/17 144/6 145/9 152/8	enough [4] 16/5 75/23 128/19 148/25	even [4] 22/12 31/23 59/3 60/6	execute [1] 9/25	failures [1] 79/21
eg if [1] 144/6	enquiries [1] 84/24	evening [3] 12/21 22/6 150/18	Executive [2] 4/17 50/15	fair [8] 30/8 30/20 50/19 50/23 77/18 105/21 142/14 142/16
eg paper [1] 145/9	enquiry [1] 70/19	event [3] 17/20 31/4 85/11	exercised [1] 80/25	fairly [3] 10/2 17/5 101/21
eg Post [1] 84/17	ensure [4] 135/18 146/10 146/12 147/7	events [1] 129/1	exhausted [1] 81/18	fairness [1] 108/12
eg transfers [1] 152/8	ensuring [1] 135/5	ever [15] 9/1 10/6 51/9 83/10 91/14 92/18 94/14 105/4 123/15 143/16 143/25 145/23 159/16 159/24 160/4	existed [2] 74/6 151/25	fall [2] 148/23 149/5
either [17] 3/5 3/11 21/12 22/17 25/19 26/7 29/1 30/12 33/6 33/9 39/6 43/6 62/16 70/5 77/4 98/24 125/10	enter [1] 137/16	every [2] 35/9 120/20	existing [2] 3/12 30/12	false [2] 67/5 73/23
elaborate [1] 108/22	entered [2] 18/14 79/19	everything [1] 14/12	expect [3] 49/13 144/20 144/22	familiar [2] 13/18 95/9
electronic [2] 33/6 121/11	entire [1] 115/8	evidence [33] 8/13 13/12 14/23 15/6 15/17 16/3 16/15 30/18 30/23 30/25 31/16 34/18 39/15 39/17 41/11 66/16 67/12 67/17 68/3 68/8 79/4 91/14 91/18 97/7 98/5 104/25 107/7 109/3 114/22 116/23 117/10 118/13 118/16	experience [9] 15/5 19/16 20/4 21/4 24/17 29/15 34/8 72/8 83/1	far [9] 24/18 34/22 35/21 36/13 115/19 143/19 145/23 153/20 154/16
element [4] 132/20 147/17 154/1 154/15	entirely [6] 57/19 72/24 95/11 97/16 111/4 111/5	everyday [1] 14/12	experienced [1] 145/2	fast [9] 24/18 34/22 35/21 36/13 115/19 143/19 145/23 153/20 154/16
elements [2] 128/20 132/3	entries [1] 10/4	evicted [1] 37/1	experiences [3] 5/23 40/25 46/2	faster [1] 13/8
else [2] 114/11 157/18	environment [2] 12/4 13/9	evidenced [1] 37/1	experiencing [4] 44/6 47/3 77/9 82/5	fault [2] 24/22 25/3
else's [4] 15/2 15/4 15/8 16/22	EPOS [8] 15/1 15/4 15/10 15/14 15/18 15/23 16/6 17/23	ex [2] 98/12 153/8	expert [8] 91/19 91/22 91/23 92/10 92/11 92/12 92/14 92/20	faulty [1] 28/9
elsewhere [2] 51/15 155/13	EPOSS [1] 15/7	ex-branch [1] 153/8	explain [9] 61/11 66/10 120/17 125/4 128/6 130/9 131/24 137/4 156/24	favour [1] 33/9
email [21] 18/25 19/10 27/12 27/17 27/24 29/3 29/4 29/12 40/2 40/23 41/15 94/5 95/12 96/15 98/24 99/21 99/25 100/2 100/16 100/20 101/15	equipment [2] 18/7 127/7	ex-postmaster's [1] 98/12	explained [1] 153/16	feature [2] 26/13 102/6
emails [7] 27/9 28/18 50/17 93/13 94/1 100/24 100/24	error [12] 14/3 31/25 32/2 33/7 61/3 61/10 62/14 64/4 64/19 79/24 152/6 152/10	exactly [3] 44/18 79/1 149/18	explains [4] 84/5 99/6 124/23 135/10	Federation [5] 67/10 69/4 70/25 71/8 71/20
emerged [3] 19/4 41/7 57/17	errors [17] 13/16 45/17 47/16 51/8 63/9 75/19 78/1 78/9 90/14 110/21 111/14 113/3 117/4 125/13 152/8 156/13 157/6	examining [1] 79/4	explanation [1] 134/19	feel [1] 20/25
emergence [1] 50/24		example [31] 3/3 4/17 13/14 15/12 15/21 31/4 40/22 41/1 47/11 48/6 57/2 58/20 61/9 66/18 71/25 76/7 77/18 79/11 87/7	exploring [1] 115/16	feeling [1] 102/23
			extent [8] 5/23 7/5 10/21 44/5 53/5 74/8 105/16 116/3	fell [1] 142/1
			externally [1] 126/9	fellow [1] 22/10
			extinguishers [1]	felt [6] 25/2 25/20 81/21 95/2 102/23 111/11

F field... [4] 36/7 36/13 59/24 153/18 figure [9] 125/25 145/9 150/10 150/12 158/4 158/6 158/15 158/24 159/8 figures [4] 6/25 49/1 126/5 151/25 final [12] 1/16 2/22 23/21 73/12 81/1 84/19 89/18 98/17 99/3 106/1 113/12 121/8 finalised [2] 53/9 53/14 finally [3] 131/18 135/3 139/6 finance [7] 51/15 51/20 52/2 57/4 62/17 130/22 158/16 financial [9] 45/9 86/25 110/22 126/6 126/23 133/17 147/3 153/19 154/15 find [10] 7/5 10/21 28/23 82/3 86/2 91/10 133/12 152/6 152/8 159/10 finding [1] 42/18 findings [2] 102/11 108/9 fine [7] 63/21 66/2 104/9 117/19 117/23 137/20 157/1 fire [1] 132/5 first [30] 2/25 22/9 29/11 41/24 44/25 56/20 60/10 60/17 61/6 61/11 62/1 64/10 64/21 65/2 69/2 69/16 69/18 73/7 75/4 80/14 99/6 114/1 121/11 126/15 130/12 131/18 136/24 137/24 140/4 147/23 fit [1] 63/9 fits [1] 89/23 five [5] 89/8 135/25 147/14 147/16 151/12 five-week [1] 135/25 fixed [1] 86/13 flawed [1] 41/11 flawless [1] 32/25 flaws [5] 18/15 51/1 106/25 107/24 117/5 floated [1] 147/14 floppy [2] 120/24 121/23 flushing [1] 78/18 focus [4] 122/8 122/10 126/5 142/10 focused [2] 122/22	129/24 focusing [3] 119/19 142/4 142/6 follow [5] 37/8 40/2 53/23 54/9 140/18 follow-up [1] 40/2 followed [6] 22/25 27/4 70/18 75/16 94/19 133/16 following [15] 21/14 39/17 60/23 87/17 119/22 127/4 134/4 135/17 138/21 139/8 141/3 141/11 146/11 156/9 160/21 follows [4] 44/23 124/24 131/2 146/9 foolproof [3] 17/17 17/21 18/4 forensic [1] 108/11 forerunner [2] 85/7 120/18 Forgive [2] 114/14 120/9 forgot [1] 139/24 forgotten [1] 9/2 form [2] 70/14 73/23 formal [5] 139/20 140/4 140/21 141/4 141/12 formally [1] 160/12 formed [1] 97/9 former [2] 36/20 37/23 formulating [1] 25/25 forthcoming [1] 139/4 forward [1] 27/8 found [9] 10/2 32/7 34/12 66/22 71/14 73/20 113/3 152/16 152/17 four [3] 135/25 141/2 151/12 franchise [5] 123/23 123/24 124/2 124/2 124/4 franchisees [1] 54/4 franchises [3] 123/21 128/16 136/8 franchising [1] 123/19 franchisors [1] 15/16 frankly [1] 33/20 Fraser [1] 65/5 fraud [1] 45/15 Friday [1] 1/1 friend [10] 69/6 69/7 70/3 70/9 70/12 71/4 71/7 71/24 72/4 72/13 friend's [1] 70/24 friends [1] 69/22 front [5] 1/13 118/24 122/1 125/8 125/12	frontline [1] 128/18 FSA [1] 147/3 FSAs [1] 154/11 FUJ00081584 [1] 114/20 Fujitsu [10] 68/11 79/11 106/4 112/19 113/6 113/13 113/21 114/12 115/14 116/12 full [5] 1/10 118/21 134/1 151/1 155/25 fully [3] 86/11 86/15 136/12 funds [3] 67/6 73/24 143/12 further [18] 39/3 67/13 79/5 104/4 117/13 117/16 128/22 134/19 136/15 136/25 137/21 138/19 139/7 140/19 141/1 141/10 148/14 151/20 future [2] 128/2 140/23 G gain [6] 33/13 106/4 113/14 113/21 152/11 152/18 gains [21] 124/6 127/13 129/22 130/1 130/14 131/11 131/14 135/6 135/19 136/15 136/19 137/7 142/19 144/11 146/3 152/12 152/23 153/14 154/20 154/23 157/25 gap [1] 3/7 gaps [1] 3/8 garbage [4] 7/21 7/22 32/14 32/14 gathered [3] 66/17 97/25 98/7 gave [2] 16/5 45/18 general [5] 42/16 101/19 102/15 102/25 158/8 generally [4] 101/21 107/22 111/15 111/24 generated [2] 39/8 110/21 generation [1] 44/7 Geoff [1] 132/21 get [22] 7/22 14/15 19/19 19/21 42/6 46/10 51/14 52/19 80/1 80/11 108/23 113/23 115/19 125/6 126/22 126/22 148/22 154/4 155/24 159/18 159/20 159/22 getting [2] 130/22 158/24 GIGO [1] 32/14	Gilliland [1] 43/1 give [13] 1/10 4/6 11/9 22/19 73/18 91/14 91/18 96/11 100/25 103/22 106/9 113/16 114/6 given [15] 21/2 30/20 34/20 39/18 63/8 75/20 94/9 114/22 115/6 125/18 127/9 129/11 138/16 139/2 156/3 glitch [1] 104/9 glossary [1] 53/25 go [34] 8/25 9/7 9/10 9/24 11/6 14/13 19/19 19/22 19/23 20/5 20/10 27/8 30/11 32/23 33/6 39/3 54/16 55/22 59/7 63/20 80/18 88/19 99/2 106/8 112/5 114/5 114/23 130/25 137/20 144/1 150/5 152/18 154/11 158/2 goes [2] 112/18 116/11 going [39] 1/6 4/22 6/16 6/18 7/14 7/16 19/14 27/11 29/11 42/18 43/22 49/4 49/11 50/21 52/9 55/3 56/8 66/7 78/12 83/13 83/17 87/4 90/17 101/17 105/11 108/5 114/19 115/18 119/17 125/10 125/11 125/11 131/22 132/21 133/13 136/13 137/2 144/24 145/17 gone [1] 116/4 good [21] 1/3 23/21 45/6 56/12 56/14 56/18 57/2 57/5 60/12 64/7 65/8 113/2 117/3 118/5 142/21 143/2 145/5 147/12 147/12 147/17 158/20 got [18] 20/4 21/9 23/4 24/11 25/9 27/6 44/10 46/15 83/25 84/4 104/12 106/17 112/25 114/24 128/11 147/18 153/12 155/15 govern [1] 69/11 governed [1] 69/18 grateful [1] 160/15 great [2] 92/15 92/16 Green [1] 21/7 group [11] 5/14 5/25 6/1 6/7 19/4 32/9 40/5 41/7 44/21 51/1 107/9 groups [1] 145/25 groupthink [1] 17/16	guess [4] 23/7 72/13 98/12 159/22 guidance [3] 74/18 127/6 131/8 guide [5] 149/17 149/21 150/13 157/24 157/25 guidelines [1] 54/19 Guiding [1] 88/22 guilt [3] 74/19 74/22 75/4 H had [152] 9/13 11/19 12/8 13/6 15/15 15/17 17/6 17/8 17/11 17/23 18/7 18/17 18/18 19/1 20/14 20/15 20/22 22/23 22/24 23/9 23/14 24/9 24/21 25/16 26/3 26/18 28/7 29/18 30/8 30/16 30/17 31/5 31/5 31/15 31/16 31/21 33/19 33/22 34/8 34/10 34/12 35/17 35/21 36/2 37/1 38/12 38/16 39/5 39/7 40/11 41/2 41/10 41/15 43/2 43/4 43/8 46/3 46/3 46/7 46/11 46/14 46/14 47/15 49/6 49/17 50/6 52/5 56/18 57/13 57/16 59/23 61/23 62/3 62/5 63/6 66/18 66/21 67/1 67/17 67/20 67/20 68/3 68/24 72/8 75/12 75/16 75/23 75/24 77/3 79/21 79/23 81/18 84/7 85/4 87/15 92/23 94/9 94/12 94/18 95/23 96/1 96/6 96/23 98/10 98/16 98/18 101/11 101/14 102/12 103/3 105/13 105/14 105/16 106/3 106/10 107/5 107/6 107/7 107/8 107/13 107/13 110/6 110/18 113/12 113/16 114/7 114/11 114/21 115/25 124/8 128/19 128/23 130/19 132/7 132/17 137/6 137/13 139/25 140/4 140/6 144/6 145/5 149/23 152/15 153/3 154/2 154/5 154/11 156/9 156/25 158/5 159/8 hadn't [4] 10/9 11/22 20/11 152/17 haemorrhaging [1] 158/23
---	---	---	--	--

H	160/2	104/20 104/21 104/23	103/18 108/11 109/12	106/3 106/10 107/5
half [6] 6/16 12/21	he'd [1] 43/7	118/15	109/18 117/10 117/17	107/7 107/8 113/12
27/10 29/17 43/21	he's [3] 23/4 24/8	hindsight [2] 10/17	122/16 123/18 124/4	113/16 114/7 153/3
55/23	25/10	78/4	128/25 131/20 158/4	I have [4] 29/15
halfway [9] 6/18 7/15	head [11] 43/2 122/5	his [10] 22/10 64/3	however [3] 70/23	93/18 98/17 100/4
7/16 93/11 94/8	122/12 122/18 128/12	64/5 80/25 81/3 81/6	107/9 127/18	I haven't [2] 21/9
126/25 132/11 133/14	128/13 128/24 130/12	81/9 115/18 118/12	HR [1] 143/22	104/12
147/22	155/13 158/7 158/14	118/13	huge [4] 34/10 48/22	I heard [2] 41/24
hampered [1] 24/19	headed [1] 154/19	historic [2] 22/12	101/16 148/20	113/25
hand [11] 55/6 55/22	heading [2] 63/24	74/6	human [2] 8/1 33/7	I joined [3] 128/7
55/25 56/4 56/12	96/19	historically [2] 41/14	hundreds [1] 19/3	145/17 154/6
56/13 56/15 133/5	hear [11] 1/3 1/6 8/10	145/16	hurdle [2] 31/14	I just [4] 59/9 69/8
134/3 134/13 136/12	13/5 35/16 80/7 97/22	hm [2] 2/11 61/5	39/19	69/21 118/9
handwritten [1] 73/8	104/7 114/9 118/5	hold [1] 111/13	I	I know [6] 42/8 43/2
happen [3] 3/2 43/12	159/24	holiday [1] 23/17	I advised [1] 23/9	104/5 126/21 156/19
88/14	heard [19] 8/9 8/24	holistic [1] 80/11	I agree [5] 39/21	159/6
happened [13] 5/3	13/12 25/4 25/6 32/9	Home [1] 33/4	65/21 69/20 111/4	I learned [1] 22/9
26/23 31/22 34/10	41/24 68/9 80/8 82/18	honest [2] 47/23	159/12	I made [1] 114/4
35/20 37/2 38/25	97/7 106/3 106/10	111/17	I am [2] 112/12	I may [1] 157/23
59/25 72/6 83/4 98/16	107/8 113/13 113/17	hope [1] 14/2	112/16	I mean [13] 16/4
129/2 136/4	113/25 114/7 160/4	hopefully [2] 5/2	I and [1] 67/15	17/25 47/18 58/25
happening [9] 17/18	hearing [4] 67/9	117/24	I ask [2] 3/21 105/23	59/22 63/16 86/8
17/20 40/18 42/17	67/15 71/10 160/21	Horizon [77] 4/20	I believe [4] 2/21	101/10 102/25 115/11
58/24 59/14 59/17	hearings [3] 68/16	4/20 8/5 9/2 9/13 9/18	71/22 105/22 153/3	128/7 128/15 153/3
129/4 159/19	71/3 71/4	9/20 10/1 12/5 12/9	I can [12] 18/23 19/9	I move [1] 89/18
happens [1] 83/17	heavier [1] 61/21	16/13 16/20 18/12	78/13 83/3 90/25 91/5	I needed [1] 100/6
happy [2] 94/11	held [6] 2/16 27/18	19/2 19/16 22/7 22/8	99/2 100/24 104/8	I noticed [1] 3/6
105/11	50/19 58/12 122/22	22/13 24/10 25/8	118/7 142/25 143/19	I now [2] 24/23 47/5
hard [3] 18/17 47/4	145/10	25/18 28/5 28/8 30/5	I can't [17] 5/1 19/12	I omitted [1] 118/12
118/24	help [10] 22/10 37/11	30/15 30/25 32/12	30/10 40/17 61/21	I overheard [1] 103/7
hardware [2] 121/19	46/9 81/6 96/18	32/16 32/23 33/4	62/7 80/4 83/5 92/8	I particularly [1]
121/21	104/24 109/12 111/10	33/14 33/25 34/3 34/7	96/13 98/2 98/4 99/14	130/21
harm [2] 45/9 86/25	133/12 135/18	38/23 39/1 40/7 40/8	104/10 117/25 130/10	I put [1] 159/24
has [32] 1/24 11/21	helped [1] 99/17	41/11 42/15 44/6 47/3	159/19	I read [2] 21/10 94/23
13/12 19/25 20/4	helpful [3] 5/24 46/6	49/8 49/9 50/18 59/19	I cannot [1] 112/17	I recall [1] 43/4
24/15 28/6 28/7 30/15	46/13	60/1 75/19 78/2	I completed [3] 18/16	I refer [1] 3/13
30/25 44/10 55/15	helpline [8] 25/8	101/24 105/14 106/15	91/12 106/23	I referred [1] 57/13
56/8 64/18 70/13	35/24 36/12 38/12	106/21 107/1 107/4	I could [4] 41/13	I remember [3]
74/19 80/25 83/19	38/14 109/4 109/8	108/3 110/21 111/14	80/18 100/19 101/15	120/23 126/4 149/15
86/17 86/22 93/16	109/13	120/18 121/15 121/17	I couldn't [1] 18/19	I represent [1]
95/12 97/7 99/3 104/5	helplines [3] 13/14	121/24 130/16 134/5	I described [1] 92/17	104/16
112/16 115/6 124/25	13/14 38/5	145/10 145/10 146/8	I did [6] 9/6 32/23	I right [3] 58/6 73/9
128/1 131/7 135/4	her [7] 28/6 95/17	146/14 147/6 147/19	92/16 123/20 132/19	90/12
148/1	96/6 102/20 103/11	149/4 153/15 156/8	148/19	I said [12] 9/24 32/19
hasn't [1] 115/7	103/11 103/13	156/16 156/24 157/8	I didn't [4] 13/20 41/4	36/10 47/5 59/10 78/7
have [167]	here [20] 16/4 24/8	157/12	59/13 101/16	96/25 97/13 97/19
haven't [4] 21/9	24/11 27/11 30/7	Horizon's [1] 102/3	I do [5] 111/6 112/21	100/15 128/11 137/10
46/16 99/14 104/12	36/15 44/8 84/21 94/4	host [1] 14/10	115/10 119/7 153/13	I saw [1] 19/9
having [15] 27/24	99/3 111/11 112/5	hour [3] 12/20 29/18	I don't [18] 20/5 23/4	I say [3] 71/2 128/14
29/21 30/6 41/17	114/24 129/7 138/5	117/21	24/7 26/17 27/25 31/2	153/6
45/24 48/6 48/8 76/17	141/4 144/13 147/23	hour's [1] 117/22	31/17 51/25 77/23	I see [1] 56/25
82/10 121/8 131/4	148/22 150/7	hours [1] 12/21	79/17 79/20 89/5 97/2	I seen [1] 41/10
138/11 149/13 155/9	hierarchies [1] 42/4	house [1] 125/8	104/4 105/4 109/14	I started [3] 35/15
159/14	hierarchy [2] 4/1	housekeeping [2]	114/21 143/24	36/3 144/5
hawkish [1] 35/3	27/21	147/12 147/17	I drafted [2] 73/11	I still [1] 9/11
he [28] 4/12 4/12	high [5] 31/14 39/19	how [39] 7/6 9/19	75/13	I suspect [1] 112/18
21/11 21/12 21/12	42/13 43/11 77/9	10/22 15/3 16/10	I first [1] 130/12	I think [156] 2/6 5/12
21/14 21/17 21/19	higher [3] 4/17 7/14	17/25 24/23 27/17	I get [1] 148/22	5/14 5/21 6/4 8/12 9/8
22/1 22/21 23/8 24/13	7/17	30/10 30/23 36/23	I guess [3] 72/13	11/20 12/15 12/22
25/2 25/2 43/2 53/4	highlight [2] 110/14	37/13 37/20 41/6	98/12 159/22	16/25 19/18 19/25
65/6 65/10 70/4 70/5	112/6	45/18 61/22 63/9	I had [17] 9/13 17/6	21/12 21/23 22/14
70/6 70/10 70/23 81/1	highlighted [2]	66/16 76/14 80/3 83/5	20/15 24/21 30/16	24/6 26/17 27/20 30/6
88/16 115/7 160/1	110/17 134/25	89/23 90/13 95/16	52/5 75/12 101/14	31/11 31/17 32/6
	him [6] 70/7 81/6	95/17 97/4 97/5		32/22 33/23 34/3 34/9

I	108/24 109/1 115/24 122/13 130/14 133/6 149/3 156/11 I wasn't [10] 40/12 41/12 52/2 59/14 60/4 91/12 91/20 108/15 109/14 109/22 I went [2] 126/13 128/12 I were [1] 4/3 I will [2] 104/11 119/15 I won't [1] 100/25 I worked [1] 90/4 I would [16] 9/10 16/1 22/15 22/17 28/17 28/23 41/8 41/10 48/15 66/25 83/6 84/3 94/10 118/14 121/6 159/17 I wouldn't [4] 21/5 59/14 60/2 98/15 I'd [22] 8/24 9/21 9/21 9/23 10/2 15/5 15/15 16/15 17/22 25/21 25/22 32/9 35/5 37/20 40/14 43/20 80/2 92/24 107/22 121/10 128/22 157/23 I'll [10] 27/23 39/3 39/11 44/2 51/10 63/14 87/5 91/1 93/6 117/24 I'm [46] 4/22 6/16 6/18 7/13 7/16 17/14 19/13 24/10 27/11 29/11 35/8 36/22 42/24 52/9 52/18 55/1 55/3 55/10 56/8 64/23 66/7 73/12 78/12 83/3 83/13 83/17 87/4 90/17 95/9 95/11 98/2 103/5 107/20 108/13 108/14 109/18 114/19 115/12 115/15 119/17 126/7 129/11 132/21 143/2 158/9 160/15 I've [23] 9/2 14/23 16/2 16/11 16/14 18/23 19/2 21/9 23/4 24/11 25/6 27/6 34/8 37/25 47/1 83/25 98/23 99/17 106/16 109/2 117/1 117/7 155/15 ID [1] 146/16 idea [1] 113/23 identification [2] 49/15 92/6 identified [7] 23/6 25/21 25/23 42/7 138/11 143/13 149/20 identify [3] 22/15 32/2 41/13	identifying [1] 26/20 IDs [1] 127/7 ie [2] 38/1 127/15 ie '3 [1] 127/15 ie not [1] 38/1 if [127] 7/21 8/25 11/6 11/19 14/12 14/13 16/1 16/21 20/9 21/25 23/17 28/21 31/23 31/24 38/22 39/5 39/22 44/2 46/11 52/15 53/10 53/17 53/25 55/2 55/5 55/6 55/7 55/22 55/24 56/1 59/16 60/2 61/9 63/3 63/20 65/17 66/1 66/18 66/23 67/1 67/20 69/10 69/15 69/21 69/25 70/5 70/23 71/19 71/24 72/13 72/15 72/22 73/3 73/7 73/12 73/13 75/16 76/12 79/5 79/11 79/23 80/8 80/18 80/21 81/21 84/5 84/13 86/16 86/21 88/2 89/5 92/8 94/11 94/16 94/17 95/12 96/16 96/24 98/6 99/2 99/6 99/20 99/24 100/6 110/3 110/14 111/4 113/3 115/7 115/25 117/21 119/3 120/22 128/19 128/24 133/23 134/6 134/8 137/14 137/21 138/17 139/3 139/15 139/22 140/4 142/1 142/25 144/1 144/6 144/10 144/13 147/25 148/3 148/10 149/4 151/16 152/2 152/17 152/20 153/10 155/23 156/22 157/23 158/1 158/18 158/21 159/8 ignore [1] 109/1 imagine [1] 16/2 immediate [1] 141/14 imminent [2] 32/10 93/18 impact [6] 75/18 126/4 128/25 130/17 131/3 142/7 impacts [1] 130/16 imperative [1] 42/20 implement [1] 134/24 Implementation [1] 120/16 implemented [5] 52/19 76/16 85/8 121/5 135/7 implications [4] 16/6 48/1 86/21 110/22	imply [1] 58/19 importance [1] 48/12 important [4] 84/10 84/21 86/16 147/1 improve [2] 127/6 127/9 improved [2] 6/23 7/20 improvement [1] 139/3 improvements [2] 21/1 134/24 improving [1] 19/24 inability [1] 82/3 inaccurate [6] 14/24 15/1 15/4 15/9 16/21 32/16 inappropriate [1] 34/25 inappropriately [1] 92/3 incendiary [2] 159/10 160/3 inch [2] 111/22 120/24 inclined [1] 7/25 include [2] 133/21 135/13 included [6] 28/16 28/19 100/2 100/10 150/12 158/3 includes [1] 150/9 including [3] 54/4 134/25 140/22 inconsistent [1] 111/5 increase [1] 148/20 increased [1] 49/7 inculpatory [2] 68/7 79/3 incumbent [1] 47/22 incurred [6] 53/23 54/10 54/21 60/21 61/2 138/12 incurring [1] 158/21 independent [1] 124/1 indication [1] 96/19 individual [23] 12/1 54/3 94/2 111/7 112/19 127/11 133/23 134/9 137/15 138/17 139/3 139/11 139/14 139/16 139/25 140/6 140/8 140/9 151/7 152/20 152/20 158/12 158/24 individual's [2] 112/21 146/24 individuals [6] 17/14 102/8 111/7 131/17 142/1 152/22 infiltrated [1] 116/3 inform [4] 85/22 91/9	98/25 134/17 informal [5] 138/10 138/23 139/9 140/14 140/20 informally [1] 153/9 information [23] 18/14 29/1 41/7 44/9 45/4 45/16 45/23 46/22 48/12 49/25 50/25 79/10 82/13 82/23 97/24 98/6 105/16 110/4 111/13 147/8 148/5 148/7 148/13 informed [1] 41/17 infrequent [1] 96/24 inherent [1] 42/14 Initially [1] 120/3 initiatives [2] 22/5 128/23 input [5] 32/16 52/23 130/19 147/18 149/23 Inquiry [12] 13/12 16/17 25/5 97/7 119/13 119/16 119/18 124/7 130/6 141/18 149/9 150/16 Inquiry's [1] 2/2 insight [2] 49/10 91/24 insolvency [1] 3/4 installed [2] 9/2 121/9 instances [1] 159/19 instead [1] 142/6 instigated [1] 129/20 instructed [2] 52/3 101/20 instructions [2] 75/20 127/9 insular [1] 128/8 integrity [7] 16/13 17/1 22/16 28/5 35/4 108/17 156/8 intelligence [1] 49/13 intended [6] 27/20 57/23 62/2 62/4 101/13 129/14 intentions [1] 37/11 interest [1] 101/17 interested [1] 55/2 interesting [2] 20/3 115/13 interests [2] 88/1 88/4 interfaced [1] 11/14 internal [2] 3/6 156/21 internally [18] 8/24 16/1 16/25 79/6 80/2 80/6 81/14 81/17 82/23 102/22 103/21 106/11 107/10 107/20 108/10 113/17 114/8
----------	---	--	--	---

I	Inwood [15] 1/7 1/8 1/12 1/13 2/3 66/7 89/18 93/14 104/15 108/18 114/14 115/7 115/24 118/12 161/3 Ireland [1] 126/8 irregularities [1] 30/14 irregularities/unpaid [1] 30/14 irrespective [1] 148/11 is [243] isn't [5] 64/22 69/13 75/5 92/12 92/14 issue [16] 20/1 22/15 22/16 29/9 33/23 44/25 49/15 59/10 62/16 78/13 92/1 94/21 94/23 115/1 129/23 149/2 issued [1] 92/2 issues [26] 3/2 4/15 26/5 26/12 26/21 26/24 35/4 40/7 40/8 43/16 44/6 45/12 72/9 82/7 87/6 89/19 99/13 109/24 116/1 116/19 116/21 119/18 149/3 153/13 157/7 157/13 it [424] it' [1] 39/16 it's [68] 5/3 5/8 6/18 7/9 7/16 8/9 8/18 8/20 8/24 9/16 11/20 13/11 14/24 14/24 17/13 20/3 23/5 27/9 28/3 30/7 30/21 43/19 43/20 47/4 48/14 52/10 52/13 54/14 54/25 55/14 56/1 56/23 62/7 63/16 64/11 65/11 65/17 68/19 69/10 84/4 86/16 87/23 89/21 94/5 99/12 99/16 99/18 99/20 99/25 101/7 101/15 102/12 103/23 110/16 110/18 111/2 113/25 116/2 117/10 118/23 119/7 126/14 130/4 145/19 147/17 151/21 158/1 159/17 item [1] 126/14 items [2] 33/2 134/15 iteration [2] 55/14 90/1 iterations [3] 53/2 63/17 74/13 its [10] 16/7 24/18 88/1 88/2 90/8 119/13 124/15 131/1 148/24 158/13	itself [1] 68/11 J January [1] 5/14 January 2018 [1] 5/14 Jarnail [1] 91/7 Jessica [5] 27/12 29/14 74/17 95/20 96/15 job [4] 28/16 28/19 95/25 128/19 John [3] 49/22 154/19 160/11 joined [6] 119/25 120/3 128/7 142/23 145/17 154/6 journalist [3] 39/24 48/9 77/20 journalists [1] 156/22 judgments [1] 65/6 junior [1] 27/21 just [73] 4/23 7/13 8/8 13/8 13/17 15/5 19/13 20/18 22/19 26/22 28/10 29/17 29/25 34/10 36/8 36/23 36/24 38/10 39/11 39/17 42/15 45/20 46/19 46/21 48/3 48/23 51/23 52/7 53/2 54/13 55/3 55/9 55/10 58/22 59/9 62/12 63/14 63/14 65/14 69/8 69/20 69/21 72/5 76/10 89/22 90/3 91/1 91/9 92/4 92/24 104/18 107/25 110/16 113/10 114/23 117/7 118/9 118/11 125/4 126/14 128/6 129/24 130/9 132/25 138/8 142/8 142/19 142/25 144/3 144/4 149/20 150/22 159/2 Justice [3] 40/11 65/5 107/9 Justice for [1] 107/9 K keep [7] 42/18 55/2 55/5 70/10 111/12 137/18 138/3 kept [1] 128/9 Kevin [1] 43/1 key [2] 139/15 149/15 keyboard [1] 121/20 keys [1] 13/17 kind [4] 13/19 27/17 68/15 73/25 kindly [1] 110/16	kinds [4] 17/11 64/5 75/17 79/15 knew [4] 102/19 108/5 139/22 139/25 know [89] 4/3 4/11 4/19 7/3 7/9 7/10 10/9 10/19 10/25 11/1 11/19 12/19 12/20 13/5 15/1 15/3 17/14 18/3 18/14 19/23 22/20 23/4 24/7 25/2 27/25 31/20 32/4 36/1 36/24 37/7 37/22 38/4 38/13 38/19 39/3 39/22 40/21 42/8 43/2 43/12 46/25 47/5 48/15 48/15 50/23 50/25 51/10 51/11 59/12 60/3 72/12 76/1 76/2 80/8 80/9 82/10 82/25 83/25 92/4 92/11 92/15 92/16 95/23 95/24 95/25 98/9 98/10 100/9 100/18 102/20 103/25 104/5 108/10 108/13 109/14 109/16 109/22 112/21 113/5 115/13 119/15 126/10 126/21 150/11 156/19 158/12 158/25 159/6 159/9 knowing [2] 38/19 159/6 knowledge [15] 1/22 19/6 22/6 32/5 40/7 41/5 60/2 83/2 103/17 105/19 106/5 113/15 113/22 119/9 159/13 known [8] 92/1 98/6 110/20 123/3 146/25 158/6 158/10 158/15 knows [1] 37/21 L lack [6] 24/3 24/19 25/18 26/12 40/7 45/23 laptop [1] 22/5 large [5] 17/15 49/15 50/25 80/10 104/16 largely [1] 56/3 last [7] 16/11 42/1 46/25 104/18 106/16 148/9 151/21 late [6] 18/24 32/7 122/4 124/16 129/18 155/10 later [6] 26/15 55/4 55/9 55/14 56/23 153/19 latest [1] 135/12 latter [5] 37/24 58/1 58/3 70/16 103/12 Latterly [1] 4/8	Laurence [1] 21/7 lawyer [7] 20/17 27/14 40/5 72/14 72/16 95/19 95/22 lawyers [7] 72/10 72/21 80/15 90/21 93/23 101/21 108/11 lead [1] 141/25 leaked [1] 159/14 learned [1] 22/9 least [2] 6/22 7/19 leave [1] 70/6 leaves [2] 103/1 146/14 led [1] 154/22 Lee [4] 94/7 94/19 96/10 159/25 leeway [2] 38/17 156/2 left [13] 6/4 6/13 55/6 55/25 56/4 56/13 60/15 86/1 86/5 102/16 103/25 122/24 128/22 left-hand [4] 55/6 55/25 56/4 56/13 Legacy [2] 4/20 59/19 legal [15] 27/13 27/14 43/8 74/14 74/15 80/16 90/4 92/19 93/24 94/1 94/18 95/4 96/8 101/13 101/18 leniency [1] 35/19 less [9] 7/9 7/25 10/25 38/3 38/12 86/7 86/19 87/1 144/23 let [2] 74/3 108/22 let's [3] 107/2 107/25 113/19 letter [7] 21/6 27/3 28/3 41/16 65/7 65/20 67/3 letting [2] 158/11 158/25 level [21] 4/12 17/6 42/13 43/11 50/14 68/25 68/25 69/2 77/9 95/18 95/19 103/5 103/14 127/11 136/24 138/25 140/15 141/6 141/13 147/7 154/4 levels [5] 17/5 125/22 134/22 136/22 142/2 liaise [1] 4/16 liaising [1] 74/15 librarian [1] 122/15 licensing [1] 147/2 life [4] 3/3 25/18 26/24 58/2 life-cycle [3] 3/3 26/24 58/2
----------	--	---	---	--

L	looked [10] 4/9 40/4 65/14 65/17 110/11 113/11 142/8 142/19 143/4 144/19	52/25 53/4 68/9 71/13 80/12 126/8 150/4 150/4	21/20 21/24 24/7 26/11 27/19 29/16 35/10 35/15 36/4 41/2 48/7 48/17 59/2 60/6 66/11 66/11 68/3 68/14 68/17 68/19 68/24 68/25 69/3 71/7 71/18 72/22 73/1 78/21 79/13 79/14 79/20 80/5 81/11 82/17 82/19 83/7 83/9 91/6 91/16 93/4 94/13 97/12 114/10 114/15 120/7 120/14 120/16 122/19 124/20 127/8 132/24 133/1 133/2 133/8 135/4 137/17 138/2 138/11 138/24 139/10 141/5 144/12 147/25 148/21 150/2 152/4 152/7 152/13 158/8	75/24 78/6 150/4
lifetime [1] 60/1	looking [27] 4/13 16/4 31/13 31/17 32/20 38/19 47/21 48/23 55/10 60/10 62/23 64/11 73/15 75/3 79/3 84/1 96/9 98/13 100/11 101/10 117/17 122/11 128/24 128/25 150/9 155/16 157/24	lots [1] 57/21	managers [39] 4/2 26/19 38/16 59/16 59/24 67/16 73/18 80/10 97/8 121/4 122/15 126/9 128/18 130/23 131/8 131/12 131/20 132/1 132/7 132/16 133/18 137/9 146/10 147/5 149/13 149/14 149/21 149/24 149/24 153/4 153/5 153/9 153/22 154/3 155/21 155/25 156/3 156/24 158/12	matter [3] 24/15 72/18 75/5
light [2] 43/15 60/23	looks [3] 5/16 55/18 64/8	low [2] 153/25 154/3	managing [8] 3/2 3/9 5/18 59/15 60/4 62/15 116/20 155/25	matters [3] 6/10 95/5 114/23
like [32] 3/13 3/16 13/18 16/7 16/19 17/15 22/2 23/24 26/19 35/5 37/20 38/12 43/20 46/25 48/16 50/18 51/14 64/9 64/10 67/5 75/9 83/4 85/2 116/6 118/14 128/16 129/1 129/17 154/14 157/23 158/18 159/2	lose [1] 86/24	lower [2] 54/1 75/2	mandated [1] 147/10	may [40] 1/17 5/3 5/4 10/7 19/13 20/22 21/19 24/14 26/2 37/8 40/22 46/6 62/1 70/3 70/10 70/15 70/17 70/23 71/7 75/19 81/6 82/9 84/16 85/13 87/18 87/25 88/10 91/11 96/6 96/19 99/10 100/10 103/16 115/9 118/8 118/25 152/6 152/8 157/5 157/23
likely [2] 24/17 32/15	losing [3] 47/10 77/13 158/13	lunch [2] 115/10 118/12	mandatory [2] 130/1 154/22	maybe [5] 43/23 48/18 50/2 110/5 155/15
limited [5] 31/3 31/12 53/22 84/8 145/22	loss [38] 23/23 31/1 33/13 34/21 60/12 60/19 61/7 61/8 125/12 125/14 125/21 127/2 127/10 127/13 127/25 129/20 135/19 136/19 136/24 137/3 137/5 137/18 138/5 138/14 140/15 140/16 141/7 141/17 141/22 142/1 148/10 148/24 152/11 152/17 152/21 153/8 155/18 158/2	Lyons [2] 114/16 114/18	Mandy [3] 94/5 95/8 95/13	McDonald's [3] 15/21 15/22 16/8
Lin [2] 49/23 82/18	losses [79] 33/16 33/19 33/22 34/22 34/24 37/1 57/6 59/11 60/21 61/2 61/4 61/8 61/12 62/12 62/16 63/24 64/3 64/4 64/6 65/9 65/12 79/23 124/6 124/8 124/14 125/2 125/16 126/3 127/15 127/16 127/16 128/3 129/22 130/1 130/14 131/3 131/11 131/13 131/15 135/6 135/19 136/14 136/22 136/25 137/1 137/7 137/22 137/25 138/12 138/19 139/7 140/11 140/19 140/23 141/2 141/10 141/24 142/7 142/10 142/19 142/21 143/2 143/13 143/18 144/10 144/11 144/22 146/3 150/10 152/12 152/23 153/11 153/14 154/20 154/23 157/25 158/21 158/23 159/5	made [22] 10/16 12/23 13/6 19/8 20/14 21/1 22/24 33/20 36/24 40/10 41/5 56/18 57/2 64/6 67/20 67/21 70/20 109/2 111/19 114/4 116/7 148/14	manipulate [1] 112/20	me [46] 1/4 5/22 10/10 14/21 18/18 18/24 22/2 23/25 24/24 40/15 40/18 41/5 42/14 42/15 46/19 48/5 48/23 51/13 52/4 53/2 59/17 66/24 68/20 73/13 74/3 75/21 80/6 91/9 92/23 94/1 97/3 97/5 97/20 100/16 104/7 106/9 107/23 108/22 109/18 113/16 114/6 114/14 115/19 120/9 149/2 153/14
line [11] 27/19 39/12 121/22 124/11 128/14 128/15 128/25 145/6 155/11 156/15 156/17	lost [2] 17/20 18/6	Madron [4] 27/12 74/17 95/20 96/15	Marine [2] 94/6 94/15	members [4] 23/14 24/2 92/3 156/23
lines [2] 19/14 84/25	lot [17] 13/12 14/25 16/12 19/25 25/6 34/4 35/13 35/13 47/1	main [4] 76/19 76/22 121/18 136/5	Marshall [2] 27/19 29/9	memory [4] 25/13 25/14 53/6 61/21
linked [1] 153/21		mainly [1] 122/10	material [7] 67/1 67/18 74/11 74/12	
list [7] 29/5 29/5 45/15 53/12 100/3 100/11 101/2		maintain [1] 77/15		
listed [4] 52/14 53/13 99/21 147/6		maintaining [1] 76/4		
listen [1] 70/3		maintenance [1] 131/10		
litigation [13] 5/15 5/25 6/1 6/8 19/5 32/10 40/6 41/8 44/21 51/1 65/5 96/20 96/22		major [5] 10/9 20/1 139/23 143/23 158/7		
little [9] 3/21 20/20 37/9 54/1 99/24 101/16 104/24 150/7 151/20		make [20] 7/25 34/2 40/25 42/11 45/3 45/20 46/3 46/5 57/5 59/8 65/8 70/12 70/17 71/22 82/9 129/21 142/21 143/2 145/5 147/5		
live [1] 22/8		makes [1] 45/11		
livelihoods [1] 47/10		making [8] 23/21 56/12 56/14 58/22 60/12 67/7 76/14 81/23		
local [2] 37/14 85/7		manage [6] 81/17 97/4 97/5 126/11 131/13 159/4		
locality [1] 84/14		manageable [1] 124/11		
location [2] 85/16 133/22		managed [15] 4/8 6/22 7/19 24/6 35/11 36/2 41/6 51/15 57/3 59/23 84/24 101/13 123/3 128/15 145/21		
locum [1] 23/18		management [16] 34/24 36/16 36/21 37/6 37/13 38/13 38/17 38/21 96/25 129/22 130/13 132/4 136/19 141/13 155/17 156/2		
log [1] 127/7		manager [82] 2/9 2/10 2/10 2/13 2/17 2/18 2/20 9/7 9/9 9/16 9/17 11/24 17/19		
logged [1] 146/13				
logs [2] 31/4 31/6				
long [12] 13/13 18/17 31/20 36/9 47/19 48/14 59/12 93/3 99/11 107/6 117/20 145/17				
longer [1] 13/22				
look [31] 20/23 21/6 27/7 27/10 29/11 31/4 31/6 35/5 43/20 44/2 48/20 51/4 53/17 69/10 69/15 73/2 73/3 80/21 83/19 84/5 87/4 87/8 93/7 94/3 95/12 96/14 98/15 99/6 99/20 123/18 155/23				

M	Mm-hm [2] 2/11 61/5	161/7	74/14 92/17 104/11	Newcastleton [1] 93/11
mental [3] 7/10 8/1 10/25	model [4] 84/13 84/17 85/5 85/7	MR BLAKE [6] 1/9 104/7 105/6 109/7 117/18 161/5	107/5 117/25 153/13	newly [1] 22/22
mention [1] 142/18	models [1] 86/15	Mr Inwood [10] 1/7 1/13 2/3 66/7 89/18 108/18 114/14 115/7 115/24 118/12	mystery [1] 117/24	next [5] 95/12 106/13 121/13 152/1 152/8
mentioned [4] 49/18 87/10 109/3 142/5	modern [2] 64/12 86/14	Mr Justice Fraser [1] 65/5	N	nexus [3] 77/23 78/1 97/14
methods [1] 70/18	modified [2] 57/15 136/8	Mr Pegler [5] 118/8 118/22 157/16 157/23 160/13	nail [1] 107/25	NFSP [5] 21/14 71/11 72/5 72/7 81/5
microphone [1] 3/23	moment [4] 16/9 118/9 143/9 144/3	Ms Page [5] 157/19 157/20 157/21 160/8 161/13	name [11] 1/10 19/12 52/16 52/17 73/6 84/4 95/9 99/3 104/15 118/21 118/25	Nick [2] 4/8 41/25
mid [1] 65/24	money [4] 126/15 126/18 139/25 158/13	Ms Price [4] 118/17 118/20 160/9 161/11	named [2] 83/23 89/21	night [2] 133/25 136/4
mid-morning [1] 65/24	monitor [1] 141/24	much [22] 1/13 1/24 3/20 11/18 12/7 12/14 43/13 48/25 56/1 64/9 66/3 99/25 109/8 110/15 112/7 117/15 118/1 128/10 128/21 140/2 142/16 160/13	names [3] 49/19 100/11 101/10	no [105] 4/18 6/3 6/3 6/9 6/11 6/12 12/11 14/20 14/21 15/1 18/4 20/1 20/13 20/15 20/18 22/2 23/4 23/11 24/11 25/1 25/2 25/14 26/17 27/6 27/6 28/2 32/3 32/15 38/23 40/3 41/4 41/24 41/24 43/17 43/17 44/22 45/3 45/11 49/3 49/3 51/10 53/10 57/3 57/13 58/22 59/9 59/22 60/17 63/11 63/13 69/20 70/19 72/11 72/22 72/22 72/22 75/6 75/20 76/19 76/19 76/19 77/25 80/17 80/17 83/12 83/16 90/16 90/21 92/9 92/21 93/3 94/21 97/13 98/18 99/9 100/23 101/9 102/3 103/5 104/12 110/7 110/9 111/23 113/2 115/5 116/10 116/11 116/17 117/13 117/15 121/23 139/18 142/18 142/23 143/6 143/15 143/15 143/19 146/1 146/24 150/13 150/13 158/21 160/6
middle [2] 110/13 115/2	monitoring [1] 131/11	multi [5] 133/24 134/6 137/15 138/7 139/21	nanny [1] 155/22	nobody [3] 15/4 15/8 16/22
might [18] 21/17 25/2 59/5 61/13 63/9 65/23 70/21 76/14 78/2 85/23 86/5 86/25 97/25 100/1 100/12 100/13 110/21 142/12	month [1] 136/10	multi-user [4] 133/24 134/6 137/15 138/7	narrative [8] 12/17 13/2 16/25 17/2 17/3 49/8 102/9 108/9	noisy [1] 19/24
migration [2] 33/17 33/24	monthly [1] 136/6	must [15] 9/9 39/12 61/12 64/6 70/4 70/10 115/17 120/8 122/1 146/10 146/15 146/16 146/17 147/5 159/4	national [8] 67/10 69/4 70/25 71/8 71/19 127/19 137/8 149/23	non [2] 54/21 134/15
million [5] 125/22 125/24 126/1 150/11 158/4	months [5] 138/20 139/8 140/12 141/3 141/11	mute [2] 104/10 117/25	NBSC [1] 148/4	non-transactional [1] 54/21
mind [7] 14/19 15/20 26/1 59/9 75/12 79/19 99/19	more [56] 8/20 14/25 18/11 19/14 24/16 25/20 25/23 27/21 29/24 30/9 30/10 30/20 32/15 35/3 35/13 35/19 35/23 36/11 37/2 37/2 37/14 37/14 37/16 37/18 38/3 38/17 38/24 39/11 49/10 49/12 49/14 51/18 52/7 60/3 64/12 64/25 77/8 78/17 86/14 96/12 102/7 104/24 109/17 117/25 124/3 126/22 130/18 130/19 137/25 138/20 139/7 140/24 141/2 141/10 150/3 154/10	MVLs [1] 134/15	nearly [1] 99/12	non-value [1] 134/15
mindful [2] 62/20 65/18	moreover [1] 140/11	my [56] 5/22 6/21 7/18 8/15 11/11 17/6 21/4 21/23 22/6 22/9 24/24 25/14 27/19 28/16 29/16 30/4 36/23 44/18 48/3 48/19 50/23 53/1 53/6 59/9 60/7 62/8 79/19 84/4 93/13 97/21 103/5 104/10 104/15 108/16 113/12 118/10 118/11 118/14 119/7 126/12 126/16 128/11 128/17 130/15 137/10 142/25 145/4 153/8 153/12 155/8 155/8 155/13 156/18 157/2 159/17 160/7	necessarily [4] 26/25 98/9 126/10 132/22	none [1] 28/10
mindset [2] 16/22 47/25	morning [5] 1/3 1/6 5/9 65/24 160/18	myself [7] 28/23	necessary [7] 66/24 67/14 78/13 79/5 85/20 93/16 134/23	nor [3] 17/22 23/15 32/3
minimum [1] 147/8	most [6] 2/18 22/2 53/7 67/22 87/19 89/25		need [11] 25/23 85/12 86/2 87/17 96/18 121/23 127/11 142/12 146/12 150/2 155/3	Norbury [2] 49/23 82/18
minor [2] 144/14 144/15	move [7] 66/7 83/13 83/17 89/18 90/17 121/12 126/6		needed [7] 25/20 57/2 76/20 77/7 92/4 100/6 100/13	normal [3] 80/9 84/25 153/20
minus [4] 142/24 144/7 144/9 144/9	moved [4] 38/3 120/10 133/10 139/10		negative [1] 18/3	normally [3] 3/16 36/13 87/15
minute [1] 89/8	moving [6] 27/8 78/20 135/24 139/13 142/4 150/14		negligence [6] 61/3 61/10 62/13 62/14 64/3 64/19	not [127] 3/23 5/4 9/16 9/16 9/21 10/8 13/8 13/18 14/16
minutes [1] 104/20	MP [1] 28/6		negotiate [1] 88/17	
misbalance [3] 132/12 132/14 133/5	Mr [32] 1/7 1/9 1/13 2/3 65/5 66/7 89/18 104/5 104/6 104/7 104/13 104/14 104/15 104/19 105/6 108/18 109/7 114/14 115/3 115/7 115/19 115/24 117/18 118/8 118/12 118/22 157/16 157/23 159/25 160/13 161/5		net [2] 124/8 125/16	
mismatch [3] 115/1 116/1 116/25			network [45] 3/18 3/18 43/9 48/21 57/17 58/2 58/4 58/8 61/16 61/19 62/3 64/12 64/16 64/24 81/10 85/8 122/23 123/2 123/16 124/15 125/1 125/18 126/3 127/5 128/3 130/2 136/1 136/7 141/23 142/17 144/5 144/23 150/1 153/15 153/25 154/17 154/24 155/11 158/10 158/14 158/17 158/25 159/18 159/20 159/23	
missed [1] 126/19			58/2 58/4 58/8 61/16 61/19 62/3 64/12 64/16 64/24 81/10 85/8 122/23 123/2 123/16 124/15 125/1 125/18 126/3 127/5 128/3 130/2 136/1 136/7 141/23 142/17 144/5 144/23 150/1 153/15 153/25 154/17 154/24 155/11 158/10 158/14 158/17 158/25 159/18 159/20 159/23	
missing [1] 125/10			networked [2] 120/20 121/22	
mistake [1] 140/1			never [8] 9/23 14/23 17/7 18/2 39/25 129/2 159/17 160/1	
mistakes [1] 8/1			new [3] 3/15 129/13 130/1	
misuse [2] 67/6 73/23				
mitigating [2] 76/13 77/7				
mitigation [1] 71/16				
mm [38] 2/11 7/1 8/2 8/7 9/4 21/16 36/19 41/19 44/13 46/1 57/9 59/4 60/16 60/25 61/5 63/25 69/24 73/5 78/25 85/25 87/12 88/11 99/23 101/6 102/5 103/10 105/1 106/7 106/12 107/12 109/5 109/11 110/24 111/9 112/24 112/24 113/18 116/14				

N	number [27] 1/25 2/16 4/23 5/8 33/15 34/12 42/9 42/16 42/22 48/18 49/5 49/16 49/19 50/1 50/5 80/7 90/25 97/21 104/5 104/16 125/18 127/20 127/21 140/18 140/22 148/5 157/1 numerous [1] 52/5	84/8 84/13 84/17 84/23 85/5 85/6 85/7 85/15 85/19 85/21 86/1 86/8 86/11 86/18 87/1 87/25 88/2 88/7 88/13 91/17 92/7 92/18 92/22 93/1 93/19 94/6 94/6 94/10 95/14 110/19 113/2 116/9 117/4 119/20 119/21 119/21 119/24 120/22 121/6 122/5 122/12 122/13 122/18 122/24 123/2 123/6 123/8 123/11 123/18 123/22 123/24 124/6 124/10 126/3 127/4 127/5 128/3 128/12 128/13 128/24 130/2 130/12 131/3 131/8 131/12 131/20 132/3 133/17 134/6 135/4 137/13 138/10 138/24 139/10 141/5 141/14 142/20 143/1 143/8 143/11 143/18 145/7 145/15 145/20 145/22 146/3 146/10 146/14 147/5 147/25 150/10 150/15 150/16 150/18 150/19 151/15 152/25 153/17 153/19 154/8 154/23 155/13 156/15 156/18 158/7 158/15 Office's [4] 28/14 34/15 63/23 112/9 officer [6] 2/6 70/23 71/8 71/11 71/19 72/5 officers [1] 72/7 offices [17] 120/19 121/15 121/25 124/4 125/3 125/17 125/19 128/16 136/7 136/8 146/13 147/14 147/16 155/22 159/3 159/3 159/15 official [2] 70/16 70/22 often [6] 15/18 28/17 28/23 35/16 67/9 123/21 Oh [1] 56/25 Ok [1] 11/16 okay [18] 14/12 14/13 19/13 89/7 89/10 106/19 109/12 110/10 110/25 111/10 112/2 112/23 113/8 113/19 114/19 114/25 115/22 116/5 omitted [1] 118/12 on [182] once [7] 67/19 70/6 77/3 81/18 86/22 98/9	136/9 one [53] 8/24 15/1 15/21 16/17 18/23 18/25 19/7 19/9 19/11 20/12 22/7 22/18 23/10 23/11 24/22 25/3 25/4 29/21 29/25 30/6 30/10 30/20 34/9 39/11 46/1 47/2 49/5 53/1 55/12 55/20 56/24 60/10 60/18 61/8 65/6 80/8 82/18 82/21 83/2 83/3 84/16 89/18 91/5 91/18 92/24 109/17 112/25 117/21 123/19 148/18 148/20 151/24 159/2 onerous [1] 64/25 online [1] 42/1 only [28] 19/9 23/10 24/22 25/3 25/9 27/25 30/6 32/7 41/5 47/2 56/10 70/3 70/11 76/24 83/2 83/3 83/3 86/24 88/25 91/9 91/16 135/18 140/5 146/12 146/17 147/1 151/2 151/24 onto [5] 10/4 52/9 146/13 148/6 157/2 onwards [4] 41/8 74/3 107/2 129/19 open [7] 47/22 81/19 84/10 85/12 91/2 111/16 143/8 openly [1] 82/12 openness [1] 117/3 operate [2] 23/19 88/16 operated [5] 27/1 109/13 120/23 123/12 139/16 operates [2] 32/13 117/1 operating [9] 58/8 60/21 62/10 84/13 84/17 85/5 86/15 146/18 146/21 operation [7] 54/5 73/25 111/13 122/23 123/15 134/7 153/20 operational [5] 109/9 122/25 126/10 149/12 149/16 operator [8] 54/1 54/2 54/13 56/6 58/17 65/1 88/1 88/8 operator is [1] 54/2 operators [6] 38/4 38/12 38/14 53/24 54/22 57/19 Operators' [2] 52/13 55/11 opinion [3] 36/23	48/3 84/9 opportunity [4] 34/18 67/11 93/20 115/8 opposed [3] 22/16 74/25 97/23 opposite [1] 97/13 option [3] 67/7 76/24 151/24 options [7] 75/23 76/11 76/21 77/4 77/8 123/19 143/8 or [191] oral [2] 118/13 118/15 orally [1] 160/15 order [6] 5/15 19/21 31/21 32/10 126/11 127/14 organisation [8] 27/22 103/6 111/6 111/8 111/16 112/1 122/10 155/9 organisational [2] 38/11 111/12 original [3] 58/1 62/5 152/10 other [46] 3/8 15/9 15/12 15/16 19/3 25/11 33/3 34/12 39/6 44/5 44/11 44/16 45/2 45/5 45/24 46/2 46/13 46/22 50/10 54/12 67/15 70/19 81/5 82/4 82/13 82/14 87/4 91/19 100/24 100/24 102/18 109/20 109/20 110/22 113/5 115/21 117/11 122/25 130/15 130/19 133/5 136/6 139/18 150/8 150/12 154/7 others [6] 24/23 25/15 26/8 45/4 58/12 91/11 otherwise [1] 123/3 our [15] 15/1 24/14 24/16 24/21 25/8 39/12 65/24 84/9 88/4 111/5 131/4 134/24 143/21 147/2 156/21 out [53] 7/11 7/15 7/22 9/7 9/25 11/2 12/9 12/9 13/22 24/16 24/22 32/7 32/14 36/7 37/9 39/9 53/17 53/22 54/8 67/4 78/10 78/18 81/8 82/3 89/6 90/7 91/10 105/3 105/12 115/5 121/24 125/11 125/12 125/16 127/21 127/22 131/1 133/16 136/15 136/20 138/6 140/22 144/4 144/7 144/8 144/15 149/15
----------	--	--	---	---

O out... [6] 149/22 149/25 153/12 154/11 158/20 159/10 outages [1] 18/6 outcome [8] 35/2 38/10 67/15 67/22 73/20 76/22 81/21 84/11 outcomes [4] 37/10 76/2 76/5 84/16 outgoing [2] 85/13 85/17 outlining [1] 86/4 outputs [1] 32/16 outside [9] 6/2 59/7 80/23 81/2 81/5 81/25 123/16 141/14 142/1 over [40] 2/4 5/5 11/6 14/1 16/11 18/10 18/13 27/9 30/22 48/14 54/16 58/20 63/20 73/3 83/6 88/5 107/5 124/9 127/15 127/16 127/16 127/22 128/1 131/22 133/13 135/8 136/13 136/18 136/25 137/1 137/13 138/20 139/7 141/2 141/11 144/10 146/7 152/1 152/7 152/14 overall [1] 149/18 overcome [2] 31/15 39/20 overheard [1] 103/7 Overhearing [1] 103/20 oversight [1] 110/7 oversimplification [1] 32/22 overstated [1] 65/10 overturn [1] 83/11 overturned [2] 82/16 82/20 owes [1] 92/20 own [16] 31/20 38/18 48/3 61/2 61/10 62/13 62/14 64/3 78/24 139/17 143/12 145/8 145/19 146/16 148/24 155/22 owner [3] 52/18 87/20 89/21 ownership [5] 130/23 154/20 155/21 155/25 158/24	54/16 54/16 55/22 55/24 63/16 63/21 69/10 69/11 69/15 69/22 69/25 73/3 73/6 73/7 80/19 80/21 84/5 87/23 88/5 88/5 90/7 93/12 94/4 94/8 95/13 96/14 99/3 99/3 99/6 105/25 110/12 110/13 112/4 112/25 119/3 127/23 127/24 130/25 131/22 132/11 133/13 133/13 133/14 135/3 135/8 135/9 136/13 136/18 137/1 137/2 141/20 144/1 144/24 146/4 146/6 146/7 147/21 150/6 151/19 157/19 157/20 157/21 158/3 160/8 161/13 page 11 [1] 137/2 page 12 [1] 151/19 page 15 [1] 141/20 page 16 [1] 146/4 page 17 [1] 105/25 page 18 [1] 144/1 page 19 [1] 147/21 page 2 [2] 90/7 96/14 page 20 [1] 119/3 page 3 [7] 53/17 55/22 55/24 87/23 130/25 150/6 158/3 page 4 [4] 20/24 54/16 88/5 99/3 page 46 [3] 43/20 43/21 110/12 page 5 [1] 133/13 page 64 [2] 6/12 7/13 page 71 [2] 63/16 63/21 page 92 [3] 69/11 80/19 80/21 page 93 [2] 69/10 69/15 page 95 [1] 69/22 page 96 [1] 69/25 paid [2] 22/10 61/12 pair [2] 133/7 133/12 panel [1] 80/10 paper [1] 145/9 papers [3] 81/8 98/12 98/14 paperwork [1] 98/10 paragraph [25] 20/23 20/25 44/1 63/23 70/1 80/24 84/19 105/24 105/25 108/1 113/11 113/24 128/4 130/5 134/20 141/18 141/21 142/3 144/2 144/25 149/8 151/18 151/21 156/12 157/10 paragraph 12 [1] 63/23	paragraph 12VII [1] 151/18 paragraph 16 [2] 141/18 141/21 paragraph 18 [1] 128/4 paragraph 19 [1] 70/1 paragraph 20 [1] 142/3 paragraph 21 [1] 144/25 paragraph 22 [1] 156/12 paragraph 23 [3] 20/23 20/25 157/10 paragraph 4 [1] 130/5 paragraph 6 [1] 80/24 paragraph 6.4 [1] 149/8 paragraph 98 [4] 105/24 105/25 108/1 113/24 paragraphs [1] 155/1 paragraphs 6V [1] 155/1 paralegal [2] 95/23 96/7 Parliament [4] 39/24 41/17 48/10 77/21 part [28] 2/25 3/11 24/6 34/11 34/21 48/19 51/9 52/6 57/17 62/19 78/4 78/24 79/25 85/8 90/21 93/17 94/13 97/9 98/7 100/1 100/21 101/2 101/4 109/23 122/9 137/11 143/17 156/6 particular [17] 17/10 17/11 29/4 42/21 46/20 48/3 50/21 87/20 91/5 100/9 100/10 101/18 102/14 103/17 103/18 111/1 150/9 particularly [3] 55/1 117/20 130/21 partnered [1] 126/8 partnership [1] 54/3 parts [4] 2/24 112/25 136/6 142/9 party [1] 92/7 passed [1] 148/5 passes [1] 134/16 passwords [2] 146/23 146/25 paste [1] 38/23 PAUL [5] 1/8 1/12 93/14 93/16 161/3 Paula [2] 43/8 103/16 pausing [5] 8/8 15/3	22/11 29/17 126/1 paying [1] 88/13 payment [7] 86/13 86/14 88/17 94/25 95/3 126/19 136/8 payments [2] 88/7 114/25 Pearce [1] 93/10 Pegler [8] 118/8 118/19 118/22 118/23 157/16 157/23 160/13 161/9 people [43] 3/1 4/3 16/18 18/1 25/11 26/18 27/4 27/20 34/12 36/7 36/12 38/11 40/15 41/22 45/2 47/1 47/8 47/10 47/14 52/6 53/10 53/11 54/12 62/15 72/6 74/10 75/14 76/17 82/13 82/14 101/10 103/14 105/18 108/8 126/17 134/24 137/15 139/18 147/7 153/4 156/1 157/2 158/19 people's [1] 17/24 per [4] 82/24 125/24 125/25 147/8 perfect [1] 10/2 perform [3] 31/8 31/19 132/17 performance [12] 127/10 127/25 129/20 134/25 137/18 138/8 138/13 138/24 140/15 141/5 141/15 142/1 performed [1] 121/7 performing [2] 133/19 151/23 perhaps [24] 22/18 23/5 26/10 35/1 36/25 44/20 48/24 55/5 63/20 75/13 76/1 77/17 85/18 86/8 87/1 91/1 95/9 99/2 99/20 111/2 115/11 117/20 117/21 157/25 period [43] 2/4 4/7 14/1 18/13 21/4 21/24 30/22 35/8 35/19 40/9 40/9 43/16 48/14 49/17 49/20 49/21 50/2 56/18 57/1 68/13 68/15 68/18 71/18 73/25 78/16 82/21 82/22 83/4 83/6 88/6 107/6 135/25 136/3 138/1 138/20 139/7 140/11 141/2 141/11 151/9 151/13 152/1 152/2 periodically [1]	130/14 periods [5] 13/13 35/25 59/18 151/9 151/12 peripheral [1] 115/17 permanent [1] 94/11 permission [2] 70/20 81/10 person [10] 15/5 25/9 29/8 70/13 70/17 74/16 81/6 113/6 133/9 152/22 person's [1] 92/6 personal [4] 19/6 67/8 83/1 83/2 personally [1] 9/21 personnel [1] 137/11 persons [2] 80/23 81/1 perspective [7] 56/5 57/8 58/16 58/19 59/6 143/22 153/24 pertaining [1] 100/17 phantom [2] 17/23 39/9 Phase [1] 119/18 Phase 4 [1] 119/18 phone [1] 153/10 phrase [2] 25/4 25/4 physical [6] 31/9 31/23 33/24 34/1 151/23 152/3 physically [1] 133/9 PI [6] 6/19 8/5 11/11 11/14 11/17 20/5 picked [1] 93/17 piece [2] 3/17 85/2 pipeline [1] 128/23 place [12] 10/4 26/4 42/11 71/3 78/8 93/20 126/25 130/10 151/8 153/22 156/7 159/1 placed [2] 61/23 146/22 plan [5] 131/5 139/1 139/11 140/17 140/25 planned [1] 157/12 planning [1] 132/6 plans [3] 138/15 150/19 159/1 played [1] 90/21 playing [1] 20/16 pleading [1] 43/23 please [59] 1/11 4/21 4/21 6/12 20/20 20/23 27/7 27/7 27/11 54/17 73/2 80/22 83/20 87/23 89/6 93/8 94/3 96/14 96/18 109/12 110/10 110/12 110/14 112/4 112/6 114/20 118/8 118/21 119/4 120/17 124/6 124/13 127/23 130/3 130/25
---	---	---	---	--

P	POL00084075 [2] 130/4 146/4	positions [1] 121/9	81/16 81/19 85/13	14/7
please... [24] 131/22	POL00084076 [2] 149/10 158/1	possibilities [2] 74/25 75/8	85/17 88/16 88/20	pressure [1] 9/25
131/24 133/13 135/8	POL00086116 [1] 88/21	possibility [5] 39/7	91/20 94/12 94/22	presumably [1] 103/25
136/13 136/18 137/2	POL00086582 [1] 93/7	78/8 113/20 116/23	95/1 116/21	prevent [1] 81/3
137/4 141/19 141/20	POL00088124 [1] 155/5	117/8	postmaster's [9] 3/3	preventing [1] 81/23
144/1 144/24 146/2	POL00088312 [1] 55/7	possible [22] 31/8	18/9 23/19 26/24 31/2	previous [3] 90/11
146/4 146/5 146/7	POL00088475 [1] 89/20	32/4 33/5 33/12 33/18	34/1 61/18 78/15	134/1 155/23
147/21 148/4 149/10	POL00088982 [1] 73/2	55/2 55/6 62/7 65/17	postmasters [39]	previously [6] 37/13
150/6 150/14 151/19	POL00093184 [1] 21/6	78/10 78/18 84/11	3/10 3/16 13/7 22/14	49/17 94/7 106/10
151/20 151/21	POL00113670 [1] 52/10	87/3 89/7 98/13 106/3	22/22 24/9 25/7 26/5	113/17 114/7
plenty [1] 89/12	POL00114930 [1] 27/7	113/13 114/12 115/14	26/19 28/18 31/18	Price [4] 118/17
plus [7] 14/24 22/7	policies [21] 2/25 3/5	126/2 141/8 146/21	35/12 35/21 35/23	118/20 160/9 161/11
86/14 142/23 144/7	25/24 25/25 26/14	possibly [6] 3/8 3/22	36/2 36/7 37/11 39/2	primarily [1] 122/13
144/9 144/9	37/8 38/2 38/5 38/9	35/19 44/11 117/9	42/9 44/12 44/15	principal [4] 27/14
plus/minus [3] 144/7	47/12 50/20 51/3 74/6	136/7	44/16 46/2 46/14	74/16 95/19 95/21
144/9 144/9	75/17 87/5 89/24	post [100] 2/3 2/7	46/22 48/17 54/11	principle [1] 32/14
pm [6] 9/16 89/14	90/11 90/13 155/12	3/25 6/5 6/13 8/13	54/12 54/15 58/14	principles [1] 88/22
89/16 118/2 118/4	155/17 155/23	13/6 16/18 19/12 22/3	59/23 60/4 60/9 61/23	print [2] 133/25
160/20	policy [88] 2/20 4/11	27/14 28/10 28/14	68/12 71/14 100/17	134/14
point [35] 13/24 14/2	23/10 24/15 24/17	28/22 33/15 33/21	106/23 106/25	printer [1] 19/23
15/15 34/3 34/5 45/6	26/3 50/7 50/7 50/22	34/15 35/3 35/5 36/20	postmasters' [2]	printout [1] 134/12
46/20 47/24 48/4 49/5	51/4 51/5 51/11 51/22	36/22 39/12 42/4	4/10 55/13	printouts [1] 134/4
59/10 60/7 61/6 62/2	52/4 52/11 52/18	43/15 44/14 46/9	Postshop [3] 125/2	prints [2] 134/3
62/4 64/9 64/10 64/22	52/22 53/18 53/21	49/14 53/8 53/22	125/4 125/15	134/13
79/18 102/15 104/18	54/8 54/18 55/5 55/9	53/24 54/5 54/9 54/20	Postshops [1] 125/8	prior [8] 39/10 74/6
111/17 111/18 111/19	55/19 58/1 58/3 58/13	54/22 56/6 58/12 59/3	potential [6] 51/7	76/24 78/11 79/6
111/23 113/7 113/8	58/14 62/10 62/23	60/12 60/19 61/4 62/3	62/9 67/1 85/22	132/19 134/1 135/17
122/23 126/12 137/14	63/3 63/18 64/12	63/22 67/6 70/21	129/23 159/7	private [2] 72/18
138/22 141/1 147/23	64/22 65/3 65/14	72/21 73/23 77/13	potentially [8] 86/19	81/15
148/9 156/7	65/18 73/11 74/2 74/4	80/24 81/2 81/8 84/8	86/20 147/15 149/2	probabilities [2]
points [16] 16/14	74/9 74/10 75/15	84/12 84/17 84/23	149/4 154/5 159/6	74/23 75/10
18/20 41/12 56/8	75/16 75/21 76/5	85/4 85/6 85/7 85/14	159/9	probabilities' [1]
56/14 56/16 57/23	76/16 76/23 83/20	85/19 85/21 86/1 86/8	pouch [1] 150/21	74/20
60/10 65/3 65/16	87/9 87/9 87/21 88/21	86/11 86/18 87/1	power [1] 18/6	probability [1] 67/19
93/16 133/20 137/4	89/18 89/20 89/23	87/25 88/1 88/7 88/12	practical [1] 46/21	probably [20] 4/4
147/19 149/16 149/20	90/1 90/11 119/19	92/7 92/18 92/22 93/1	practice [10] 45/7	19/18 19/24 21/12
POL [9] 13/4 26/8	124/7 126/24 127/2	93/19 94/6 94/6 94/10	45/7 71/6 71/17 71/22	30/20 36/4 37/2 50/3
28/10 33/25 36/12	127/19 129/9 129/14	110/19 112/8 113/1	119/19 141/24 142/11	53/1 61/19 61/21
67/22 74/11 91/17	130/1 131/1 131/6	116/9 117/4 119/20	147/12 158/11	89/25 93/5 95/18
110/10	131/11 131/18 131/21	119/21 119/21 119/24	pre [7] 12/5 22/13	103/14 122/2 129/16
POL's [1] 5/24	132/6 132/18 142/8	122/24 123/8 123/11	49/8 58/8 64/16	129/18 147/18 156/19
POL00000246 [3]	142/19 143/3 144/11	124/6 124/10 127/3	129/17 145/10	problem [10] 10/9
63/16 69/9 80/19	144/18 146/3 147/9	132/3 137/12 145/7	pre-Horizon [4] 12/5	15/7 25/10 25/21
POL00005933 [1]	147/20 149/7 149/19	145/20 145/21 156/14	22/13 49/8 145/10	36/14 44/10 46/12
87/8	154/20 154/23 155/3	156/18 159/3	pre-Network [2] 58/8	47/19 48/24 51/24
POL00006666 [3]	155/12 155/18	Post Office [2] 2/7	64/16	problematic [2]
4/21 43/19 110/12	poor [3] 24/19	8/13	pre-reviews [1]	42/18 76/3
POL00021853 [1]	127/25 134/25	post-Network [1]	129/17	problems [26] 9/22
99/20	position [12] 5/25	62/3	precautionary [10]	14/10 15/17 16/1
POL00021883 [1]	24/24 40/10 47/18	postal [1] 2/6	66/22 77/2 78/14 87/9	18/12 25/7 40/19 42/7
101/1	56/1 65/11 86/4 91/3	posted [4] 132/10	87/10 87/14 87/18	42/14 44/16 45/21
POL00022167 [1]	94/15 120/21 130/15	135/19 136/5 152/21	88/10 88/24 88/25	46/14 46/24 47/3
99/2	145/1	posting [1] 136/14	preclude [1] 72/14	47/23 47/24 51/20
POL00022240 [1]		postman [1] 120/3	precursor [1] 77/2	65/13 82/2 82/4 94/9
101/1		postmaster [40] 4/15	premises [3] 34/1	102/3 105/15 108/25
POL00041427 [1]		11/19 13/25 19/1	88/16 88/18	110/20 111/14
96/14		21/13 22/10 22/16	premium [1] 139/24	procedural [1]
POL00072146 [1]		23/11 28/17 28/22	prepare [1] 136/2	154/10
94/3		35/9 35/17 43/4 44/9	prepared [1] 39/13	procedure [9] 11/23
POL00075610 [1]		44/11 46/2 46/7 46/11	prescribed [1] 76/5	23/24 68/1 69/12
83/20		61/7 62/21 63/5 65/19	present [2] 67/11	80/20 92/5 119/19
POL00083982 [1]		66/23 67/4 67/23 68/2	81/6	152/12 152/24
124/13		71/12 72/19 77/5	pressing [2] 13/17	procedures [7] 11/18

P procedures... [6] 12/7 14/5 38/9 66/13 91/25 135/1 proceed [1] 70/7 proceeded [1] 93/18 proceedings [2] 90/19 91/15 process [38] 14/11 26/5 36/8 39/5 43/11 51/18 51/23 52/1 52/4 52/5 52/7 52/8 53/5 53/16 67/25 77/3 77/3 78/5 78/8 78/24 81/17 81/18 87/17 93/14 127/14 135/17 137/3 137/5 138/6 138/14 140/17 141/7 141/17 141/22 150/14 153/5 153/21 155/19 processed [1] 31/7 processes [9] 37/8 38/2 38/6 38/15 53/22 54/9 54/19 98/7 126/10 processing [2] 7/10 11/1 processor [1] 120/22 produce [2] 13/8 34/18 produced [3] 12/2 15/14 33/8 produces [1] 32/16 producing [1] 31/10 product [4] 22/5 120/24 126/23 150/24 production [3] 12/18 135/14 135/15 products [1] 11/9 profit [2] 126/22 135/19 profitability [2] 126/23 131/6 profitable [2] 86/19 123/18 programme [4] 3/17 57/18 85/3 85/9 programmes [1] 156/20 progress [2] 91/10 91/10 project [2] 122/3 122/6 proliferation [1] 35/1 prominently [1] 102/7 promoted [1] 120/13 proof [1] 97/18 proofing [2] 5/13 114/1 proper [1] 39/14 properly [3] 37/1 71/15 79/9	proposal [1] 44/23 prosecute [1] 15/22 prosecuted [1] 15/13 prosecuting [2] 47/7 92/8 prosecution [5] 97/2 97/4 97/10 98/1 98/14 prosecutions [4] 43/6 90/22 91/8 95/10 prospective [1] 94/11 protect [2] 131/16 134/24 protection [4] 45/1 45/13 48/1 146/24 prove [2] 18/1 18/2 proven [3] 74/19 74/24 75/24 provide [11] 30/18 30/23 30/24 31/16 45/16 54/18 91/24 98/5 131/7 131/12 131/19 provided [5] 15/23 49/10 68/2 68/12 127/6 providing [6] 26/21 37/10 76/10 118/15 119/14 160/14 provision [3] 64/18 81/13 82/7 public [3] 16/12 18/14 92/3 publicise [3] 45/7 45/8 46/13 published [2] 2/1 40/22 pulling [1] 124/20 punitive [3] 129/24 140/3 142/5 purely [8] 56/5 57/7 58/16 58/18 63/3 81/15 129/24 154/1 purpose [13] 2/19 5/20 5/21 53/18 53/21 79/2 81/9 81/12 85/10 90/8 90/9 131/2 158/11 purposes [1] 119/11 pursuant [1] 123/12 push [2] 7/10 11/1 put [18] 7/21 14/21 18/18 42/11 46/7 46/19 48/5 48/12 98/10 112/16 115/20 118/9 118/14 144/8 144/15 149/24 157/2 159/24 putting [2] 13/16 145/8	question [4] 44/18 48/4 91/2 143/1 questioned [11] 1/9 70/13 70/17 70/23 104/14 118/20 157/21 161/5 161/7 161/11 161/13 questioning [1] 30/4 questionnaire [1] 18/16 questions [17] 5/22 14/18 14/20 20/18 70/4 104/4 104/5 104/6 104/12 117/13 117/16 119/15 157/15 157/17 157/19 160/7 160/15 quick [6] 45/15 149/17 149/21 150/13 157/24 157/25 quicker [9] 11/18 12/8 12/14 12/24 13/11 14/6 14/8 14/12 14/16 quickly [4] 48/13 87/5 93/7 102/16 quiet [1] 3/21 quite [30] 11/20 13/11 13/12 16/19 17/13 18/24 26/20 33/20 34/4 40/15 42/12 48/13 51/11 51/13 62/7 64/21 68/9 71/14 80/9 86/16 87/3 87/5 100/16 102/10 102/16 103/1 115/15 150/3 153/12 159/9 quoting [1] 137/24	reactive [1] 84/25 read [16] 16/12 19/2 19/14 21/10 27/23 39/11 41/4 44/2 47/1 86/23 94/23 100/19 102/18 105/4 107/2 144/4 reading [2] 41/25 100/21 reads [5] 61/12 61/13 131/2 146/8 147/24 real [4] 11/11 51/22 56/10 60/17 reality [1] 59/6 really [21] 14/6 16/17 20/1 26/23 40/18 45/20 46/20 48/5 51/23 59/1 62/18 82/1 90/5 99/18 99/19 101/9 102/13 123/17 129/19 149/20 151/24 reason [13] 50/10 51/17 72/12 75/20 99/13 103/2 105/23 139/13 149/13 152/15 153/21 154/7 155/6 reasonable [3] 12/24 75/1 75/11 reasonably [1] 43/11 reasoning [3] 147/10 155/19 156/6 reasons [7] 45/16 61/14 71/10 102/20 126/2 127/21 152/17 reassured [1] 17/12 rebuked [1] 114/11 rebuttal [4] 106/10 113/17 114/7 114/9 recall [40] 15/6 27/24 29/19 30/6 30/8 40/2 40/17 42/21 43/4 43/24 44/19 51/25 57/1 68/11 73/13 74/1 74/15 74/21 82/15 83/3 83/23 91/5 91/12 93/1 95/8 95/16 96/13 98/4 99/14 100/21 101/7 102/3 121/24 130/6 135/21 143/24 153/13 157/6 157/11 159/19 recalled [2] 20/12 29/21 recalling [2] 94/17 96/9 Receipts [1] 114/25 Receipts/Payments [1] 114/25 receive [7] 13/20 18/10 60/8 68/7 86/13 90/20 94/24 received [11] 15/6 22/2 25/16 27/24 29/19 30/8 41/2 48/6	65/7 68/4 159/25 receiving [1] 35/13 recent [4] 89/25 125/1 127/25 128/1 recently [1] 19/25 recheck [2] 152/3 152/5 recipient [1] 99/22 recipients [1] 27/16 reclaims [1] 28/11 recognise [4] 24/4 46/24 48/11 75/3 recollection [7] 21/9 24/11 27/6 28/1 60/7 83/25 90/23 recommended [1] 133/18 reconcile [4] 47/5 134/12 134/13 134/15 reconciliation [1] 31/9 reconsidered [1] 91/3 record [7] 118/10 118/14 133/1 133/3 137/19 153/8 155/4 recording [1] 131/10 recover [4] 53/23 54/10 54/20 63/2 recovered [2] 39/10 51/12 recovering [2] 51/22 62/19 recovery [6] 47/12 50/21 51/4 51/11 62/16 62/24 rectify [2] 152/9 157/13 redesigned [1] 131/7 reduce [1] 131/15 reduced [1] 8/14 refer [5] 3/13 109/23 109/24 128/4 142/3 reference [12] 1/25 12/6 28/12 56/11 58/15 59/5 69/22 80/22 112/7 137/25 143/3 155/5 references [1] 100/25 referred [6] 5/12 57/13 57/18 71/10 78/23 138/8 referring [9] 15/8 15/9 23/4 24/8 28/6 35/8 103/6 107/20 144/3 refers [3] 64/18 65/6 85/6 reflection [1] 39/18 refresh [1] 52/4 regard [3] 28/15 82/8 103/4 regarding [16] 16/13
--	--	--	---	---

R	114/13 115/15	84/24 117/18	rigidly [2] 38/5 38/7	saved [1] 11/17
regarding... [15]	removed [3] 4/4	respective [1] 60/22	rising [1] 153/14	saving [1] 12/6
18/15 43/6 46/22 50/8	146/15 155/18	respects [2] 32/12	risk [4] 88/2 153/24	savings [3] 12/17
51/1 66/12 93/14	remuneration [3]	33/2	153/25 154/4	12/22 13/5
106/15 106/20 106/25	4/10 86/10 88/19	responding [1] 20/18	robust [4] 17/2 17/17	saw [3] 19/9 41/21
107/4 107/21 108/2	reorganisation [1]	response [10] 3/16	156/16 156/25	153/25
108/16 113/4	110/9	29/3 29/12 39/23 40/6	robustness [4]	say [68] 6/20 7/2 7/8
regards [1] 108/12	reorganisations [1]	42/6 46/19 94/16	106/15 106/21 107/4	7/24 9/5 10/19 10/24
regime [1] 71/3	36/5	98/25 99/17	108/2	17/25 19/17 20/25
region [1] 24/2	repay [1] 39/2	responses [1] 39/25	Roderic [1] 93/13	28/19 29/2 29/13
regional [4] 37/14	repeated [1] 59/1	responsibilities [3]	Rodric [1] 96/16	30/10 30/11 30/14
122/12 153/5 154/12	repercussions [1]	127/8 131/10 131/21	rogue [1] 112/19	32/11 32/23 32/24
regular [3] 101/11	152/14	responsibility [3]	role [7] 2/23 4/1 4/2	33/1 33/11 33/12
132/19 147/5	report [19] 66/21	63/22 139/18 140/6	60/3 96/23 100/9	34/14 38/7 39/4 45/13
regulations [1]	66/25 79/12 99/7 99/8	responsible [8]	121/2	45/14 50/19 56/21
137/12	100/1 100/22 101/5	52/22 54/5 56/6 58/17	roles [4] 2/16 16/19	57/7 64/23 71/2 72/2
rehear [1] 79/2	101/23 103/9 104/20	61/7 64/2 83/24 135/4	27/17 122/22	73/9 75/7 76/15 77/16
reinstated [1] 77/5	104/22 105/3 105/12	rest [1] 159/22	roll [2] 13/25 151/25	77/16 79/8 85/10
reiterate [4] 138/14	105/17 107/19 108/6	result [5] 8/16 42/10	rolled [4] 24/16	91/22 98/17 99/10
140/16 141/7 141/7	108/25 148/2	88/12 129/10 134/17	121/24 149/22 149/25	101/18 105/19 106/8
reiterated [1] 127/13	reported [5] 23/14	resulting [2] 110/22	rolling [2] 152/7	108/1 108/24 113/10
reiterates [1] 131/15	23/16 25/7 125/17	127/17	152/14	114/5 114/17 124/7
related [1] 28/18	148/10	resume [1] 160/17	rollout [1] 34/6	124/19 128/14 129/6
relates [2] 114/22	reporter [2] 28/6	retail [10] 81/10	roughly [2] 50/6	130/6 132/2 132/21
114/25	41/18	85/18 125/7 125/8	110/12	139/24 145/3 147/14
relating [2] 44/6	reporting [3] 4/3 4/7	125/14 126/6 128/14	route [1] 152/11	148/21 149/10 150/15
99/13	136/20	128/15 128/25 155/11	Rule [1] 115/4	150/25 151/6 153/6
relation [8] 40/5 70/1	reports [4] 95/24	retained [1] 98/11	Rule 10 [1] 115/4	156/12
107/16 107/17 119/20	96/1 96/3 135/15	rethink [3] 40/10	ruled [2] 39/9 78/10	saying [13] 19/7
121/2 129/11 145/2	represent [1] 104/16	40/25 41/6	rules [1] 137/11	25/10 47/14 65/7
relationship [10] 3/9	representation [2]	return [3] 5/8 23/19	rumour [1] 114/10	90/12 110/18 111/10
26/18 35/10 35/12	67/8 71/23	43/18	run [4] 94/7 121/6	111/11 111/24 112/19
35/22 36/3 36/11	representations [1]	reveals [1] 159/2	122/17 150/19	113/1 144/13 150/2
37/17 38/4 59/24	39/14	review [12] 93/17	running [4] 5/5	says [44] 7/2 7/4 7/23
relatively [2] 25/17	representative [2]	122/11 129/4 129/6	123/25 132/3 155/22	8/3 8/25 10/18 10/20
32/7	21/18 69/3	129/10 129/13 129/19	Rural [1] 2/16	11/4 19/14 20/2 20/7
relayed [1] 107/16	represented [1] 72/7	130/15 130/18 138/24	S	22/1 22/21 23/8 23/13
releases [1] 157/12	reputation [1] 88/3	141/5 141/14	sacrosanct [1]	24/13 28/5 39/11 44/2
relevant [1] 94/13	request [8] 26/7 26/8	reviewed [2] 53/8	146/23	44/3 46/11 53/20
reliance [2] 7/9 10/25	38/8 43/23 44/14	53/14	said [40] 9/22 9/24	54/17 56/20 56/23
reliant [2] 35/23	44/17 90/2 115/4	reviewing [2] 130/6	14/5 14/22 25/6 25/12	58/21 64/1 70/1 70/2
36/11	requested [1] 35/17	130/9	32/6 32/19 36/10	73/16 74/18 80/23
relied [1] 63/3	requests [2] 44/20	reviews [4] 129/17	40/17 44/24 47/1 47/5	80/24 84/6 84/19
relying [1] 16/6	60/8	129/17 129/18 156/25	52/21 58/25 59/10	87/24 88/5 93/12 94/8
remain [2] 104/11	required [9] 70/6	revisiting [1] 47/18	69/3 69/5 69/20 70/8	96/16 106/19 108/18
148/7	73/18 79/11 127/3	rewrite [1] 143/23	78/7 78/20 79/23	127/1 127/24
remaining [1] 125/17	131/16 138/25 140/16	rewriting [1] 154/22	80/14 82/23 90/19	scale [2] 48/20 136/8
remarks [1] 65/10	141/6 151/2	rewritten [1] 155/2	93/16 96/25 97/13	sceptical [1] 40/16
remediation [2]	requirement [7]	right [42] 2/5 7/21	97/19 100/15 103/8	scope [1] 65/20
14/15 18/8	23/16 142/20 143/1	32/21 55/22 56/12	109/4 111/2 117/2	score [2] 130/24
remember [21] 19/12	143/4 143/6 147/2	56/15 56/25 58/6 73/9	117/7 128/11 133/7	158/8
19/20 19/22 21/8	147/8	79/10 79/15 81/1	137/10 151/12	Scott [1] 154/19
21/11 24/25 27/12	requirements [1]	84/22 90/12 105/23	sale [1] 85/19	scratch [1] 137/21
61/22 62/7 80/4 83/5	147/3	106/17 108/23 109/20	sales [4] 22/4 123/1	screen [18] 5/1 5/2
92/8 99/8 99/11	reserve [1] 147/13	110/4 110/14 110/25	126/23 129/17	5/6 19/22 31/24 32/1
120/23 124/19 126/4	resignation [1] 85/11	112/5 114/3 114/5	Sam [1] 104/15	52/10 55/3 84/20
130/11 130/21 143/19	resigned [2] 54/24	114/19 117/17 120/1	same [13] 24/23 50/6	101/1 110/10 124/13
149/15	84/9	122/6 122/20 123/4	55/5 55/8 55/24 56/3	130/3 141/19 146/3
remembered [1]	resolution [2] 66/8	124/10 124/17 124/18	57/11 95/19 95/21	149/9 151/19 157/7
132/16	95/13	148/22 151/4 151/10	105/5 112/25 129/21	screens [2] 19/18
reminder [1] 113/10	resolved [1] 13/24	151/11 157/13 157/14	149/18	125/9
reminds [1] 11/8	resources [1] 31/19	157/20 157/20 160/12	sat [1] 26/6	screwdriver [1]
remotely [3] 112/9	respect [7] 62/11	right-hand [3] 55/22	save [1] 61/8	52/25
	63/1 66/17 71/4 84/12	56/12 56/15		scripts [2] 38/15

S	110/13 110/16 115/1 115/8 117/10 118/5 125/21 133/3 136/16 138/5 140/18 144/20 144/22 159/11 seek [1] 88/15 seem [5] 15/16 45/15 46/3 109/8 128/9 seemed [2] 36/8 155/16 seems [13] 24/16 35/6 43/21 44/14 44/19 45/20 56/3 56/17 58/19 61/9 69/11 105/17 109/16 seen [23] 14/23 16/2 16/15 17/23 18/23 29/21 30/6 41/10 45/6 50/17 89/24 90/12 91/3 93/13 98/21 98/23 107/7 115/7 124/11 129/22 140/2 154/3 159/4 sell [1] 86/2 sellable [1] 87/1 sending [1] 150/20 senior [13] 4/2 16/19 17/5 27/17 53/7 60/3 68/25 95/16 95/17 101/21 114/10 114/15 122/14 sense [5] 45/3 45/11 45/20 46/3 46/5 sent [4] 28/17 65/19 66/24 67/3 sentence [4] 39/11 106/13 106/19 111/1 separately [3] 63/7 72/24 97/16 September [5] 129/14 130/2 142/18 146/2 149/6 September 2008 [3] 129/14 142/18 149/6 serious [2] 73/21 131/4 service [13] 3/4 52/13 53/23 54/22 54/23 55/12 55/13 76/4 106/2 106/16 113/12 122/18 129/17 services [14] 27/13 27/15 42/18 43/8 74/14 74/15 77/14 90/4 93/24 94/2 101/14 101/18 123/13 147/3 serving [2] 2/6 139/23 set [8] 3/17 53/22 85/2 105/12 127/21 127/22 133/7 136/15 sets [6] 53/17 54/8 90/7 131/1 136/20	138/6 setting [2] 67/4 125/16 seven [1] 98/11 seven years [1] 98/11 shape [1] 37/9 share [2] 82/13 141/23 shared [2] 130/16 146/25 sharing [7] 44/9 45/23 46/21 48/12 49/3 49/25 158/11 sharing-off [1] 49/25 she [29] 7/2 7/4 7/23 8/3 10/18 10/20 11/4 19/14 20/2 20/7 27/13 27/13 27/14 28/7 44/2 44/3 90/2 93/12 94/8 94/14 95/2 95/2 95/10 95/16 95/18 96/6 96/11 102/23 102/24 sheet [2] 67/16 138/2 shift [1] 35/7 shining [1] 43/15 shock [1] 158/19 short [3] 66/5 89/15 118/3 shortage [1] 35/18 shortages [4] 8/14 34/5 38/24 39/3 shorten [1] 115/20 shortfall [3] 112/12 116/5 148/24 shortfalls [7] 44/8 45/25 47/15 66/13 119/23 145/2 145/5 shortly [1] 41/16 should [41] 1/14 5/2 20/8 20/9 38/24 39/4 39/9 44/10 44/15 55/23 62/21 68/2 68/7 77/25 78/7 78/10 78/17 81/1 81/7 84/24 110/19 115/8 116/18 116/21 117/6 118/24 128/2 129/8 133/9 135/11 136/14 138/15 146/22 146/25 149/18 151/15 155/12 156/3 157/2 160/1 160/2 shouldn't [1] 20/8 show [6] 33/18 33/22 90/25 99/2 115/25 160/1 showing [2] 23/20 105/20 shows [1] 28/9 shrinkage [3] 125/2 125/5 125/9 sic [1] 39/6 side [16] 2/13 21/21 55/6 55/22 55/25 56/4	56/12 56/13 56/15 60/15 95/10 104/10 125/15 129/24 140/3 142/5 Sight [25] 98/17 98/19 99/1 99/7 99/14 100/1 100/21 101/4 101/12 101/20 101/23 102/12 102/25 103/9 104/19 104/20 104/22 105/3 105/12 105/17 107/19 107/21 108/6 108/9 108/25 sign [1] 132/8 signal [1] 70/5 signature [3] 1/19 119/6 119/7 signed [11] 58/7 58/9 62/3 62/5 132/2 132/7 138/16 139/1 139/12 140/17 140/25 significant [7] 2/18 18/12 40/19 66/19 78/15 87/16 96/12 significantly [1] 73/14 signify [1] 29/7 silo [7] 72/25 82/11 97/2 101/13 128/5 129/3 129/12 similar [9] 4/12 4/12 25/4 25/15 40/6 71/3 82/4 125/22 130/11 simple [2] 8/17 51/11 simplification [1] 8/20 simplistic [1] 126/20 simplistically [2] 126/12 126/16 simply [1] 39/15 since [1] 91/3 Singh [1] 91/7 sir [20] 1/3 65/23 66/7 89/11 89/17 104/4 104/6 104/13 105/24 115/11 117/13 117/15 118/1 118/5 118/18 157/15 157/19 157/22 160/10 160/19 sit [3] 4/1 68/16 155/12 site [1] 123/22 sitting [3] 5/16 83/10 138/1 situation [4] 6/23 6/24 7/20 63/12 situations [1] 90/14 six [5] 98/11 141/3 141/11 147/14 147/16 size [1] 48/21 skillset [1] 79/15 slightly [9] 3/22 3/23 7/14 7/15 7/17 9/12 55/4 56/2 102/6	slow [1] 19/24 small [5] 80/8 89/19 101/2 104/5 158/21 smaller [1] 86/9 smokescreen [1] 45/5 Snap [1] 127/12 snappier [1] 150/3 snapshot [5] 134/2 134/6 134/8 134/12 134/14 so [144] 4/23 8/15 9/13 10/1 10/4 10/8 10/11 11/11 11/19 11/21 12/23 13/10 14/5 17/21 20/11 20/19 21/20 24/2 25/10 26/6 26/22 27/3 29/4 29/7 29/13 29/17 29/18 31/3 33/20 34/6 40/4 40/22 43/19 44/8 44/14 45/9 45/12 47/4 47/19 49/1 50/2 54/8 55/5 55/18 56/13 57/14 57/19 58/3 58/6 59/19 60/14 61/6 61/7 62/1 63/16 64/8 66/18 68/6 69/2 69/9 69/12 70/23 71/24 76/5 76/9 76/12 77/18 79/3 80/10 80/18 82/21 84/23 85/10 85/20 85/21 85/23 86/12 86/19 87/18 88/9 88/22 90/3 92/3 92/16 93/4 93/18 93/25 94/16 96/6 99/11 101/16 103/25 105/5 105/17 105/22 106/19 110/4 110/9 110/14 111/10 111/24 112/5 112/25 114/1 116/6 117/17 117/21 121/20 122/3 122/13 123/19 126/25 128/18 128/20 129/7 130/18 132/7 133/7 136/3 136/24 137/13 137/24 139/19 140/2 142/6 143/5 144/4 145/8 147/16 148/22 149/16 149/20 149/23 150/1 150/13 151/8 153/3 154/3 156/19 157/2 158/13 158/23 159/8 160/17 software [5] 51/2 78/9 79/24 117/5 157/12 sole [1] 140/6 solely [2] 120/19 122/22 solicitor [5] 5/11 6/17 43/22 95/24 96/6 solicitors [1] 102/2
----------	--	--	--	--

S	sound [2] 107/11 124/16	58/25 66/10 69/6 70/15 70/24 78/23 90/20 91/13 98/18 99/15 105/24 105/25 106/24 108/14 108/24 111/19 113/10 113/21 114/1 114/4 118/13 118/15 118/25 119/3 119/8 119/14 124/7 124/19 128/4 128/11 130/5 134/2 135/15 137/10 141/18 142/4 142/9 143/7 144/2 144/24 149/8 149/11 150/15 151/2 151/18 151/20 153/16 155/2 156/12 157/11 160/14	structured [1] 130/19 struggling [1] 159/3 stuck [3] 38/5 38/7 99/18 sub [3] 128/16 136/7 159/2 subject [4] 92/15 92/16 137/7 152/23 submarine [1] 116/6 submarine-like [1] 116/6 submitted [1] 70/15 subpostmaster [26] 3/14 28/8 29/25 30/16 30/24 31/14 34/16 37/21 37/22 57/15 57/15 57/16 61/14 63/15 64/2 69/9 79/23 80/25 81/4 81/7 81/23 86/2 86/13 88/9 88/13 97/10 subpostmaster's [2] 62/6 85/23 subpostmasters [48] 18/11 20/9 20/22 21/2 26/2 28/11 28/13 37/17 39/19 40/12 44/5 45/17 45/24 45/24 48/8 54/4 57/10 58/7 59/2 63/2 67/10 67/25 69/4 70/25 71/9 71/20 82/3 82/4 84/22 86/22 95/5 96/22 104/16 106/6 107/9 113/15 113/23 116/6 123/10 128/19 145/3 145/4 145/7 145/14 145/19 156/23 159/8 159/15 subpostmistress [1] 65/7 subpostmistresses [1] 104/17 subsequent [1] 36/5 subsequently [7] 54/24 55/19 97/25 98/8 98/21 102/19 120/13 substantiate [2] 30/17 31/15 substantive [1] 88/23 substantively [1] 73/14 successfully [1] 24/15 such [10] 3/18 64/6 81/4 81/9 87/6 95/3 105/7 115/25 116/8 116/19 suffer [2] 45/9 86/25 suggest [1] 45/9 suggesting [2] 97/7 114/11 suggestion [1] 17/8	suggests [2] 29/24 30/19 summarily [2] 77/6 84/8 summarise [3] 51/24 54/8 87/13 summary [2] 134/10 136/20 supervisory [4] 127/12 132/12 132/14 154/1 suppliers [1] 125/11 Supply [1] 120/7 support [25] 3/1 22/19 25/23 26/9 26/22 30/18 34/18 35/14 70/16 81/5 121/3 121/12 122/13 122/14 123/24 124/4 128/17 128/21 131/19 138/25 140/15 141/6 142/12 153/18 154/12 supported [1] 74/10 supporting [3] 36/7 123/20 150/20 suppose [1] 109/17 sure [15] 24/10 34/2 36/22 42/11 65/25 73/12 95/11 112/12 112/13 115/16 125/6 126/7 132/17 148/3 158/9 surpluses [1] 34/5 surprise [5] 127/12 132/12 132/14 132/21 132/25 Susan [2] 101/19 102/16 suspect [1] 112/18 suspend [1] 76/25 suspended [8] 30/13 42/10 43/4 76/7 76/18 88/8 88/10 88/17 suspended/terminate d [1] 30/13 suspense [1] 134/10 suspension [16] 43/12 66/23 77/2 78/5 78/14 78/16 87/6 87/9 87/11 87/14 87/18 88/6 88/22 88/23 88/24 88/25 suspensions [11] 42/12 42/17 42/22 43/6 49/6 49/16 50/1 50/5 50/9 76/2 77/12 suspicion [1] 148/1 Suspicious [1] 147/23 suspicious [3] 148/11 148/15 148/25 switch [3] 138/16 139/2 139/4 sworn [4] 1/8 118/19
----------	-----------------------------------	--	--	--

S	Talbot [3] 94/5 95/8 95/13 talk [9] 9/9 15/18 46/1 105/8 105/9 106/1 113/20 113/24 116/12 talked [3] 20/20 41/22 77/19 talking [6] 5/10 17/14 68/15 108/13 108/14 111/18 targeted [1] 49/12 task [1] 16/17 team [42] 4/9 4/13 17/7 22/18 22/18 26/10 34/20 42/24 43/2 51/16 51/20 52/2 53/1 57/4 68/4 68/5 91/8 92/19 92/23 93/2 95/4 96/8 122/6 122/9 122/15 126/17 147/18 147/19 148/6 148/12 150/2 153/3 153/8 153/18 153/18 153/25 154/12 154/19 154/24 155/10 156/4 156/21 teams [2] 13/4 26/20 tell [7] 3/25 4/24 17/3 23/2 42/14 73/13 116/4 telling [2] 16/24 86/3 temporary [4] 88/15 88/20 94/22 95/1 tend [2] 40/14 95/25 tensions [1] 52/1 term [6] 8/22 8/23 36/18 54/14 65/9 156/13 terminal [1] 120/21 terminals [1] 33/3 terminate [1] 76/25 terminated [8] 30/13 76/18 77/6 83/18 83/19 84/8 85/24 86/23 termination [9] 60/23 76/7 76/8 77/15 84/10 85/11 85/12 87/2 94/24 terminations [3] 49/6 77/10 83/5 terminology [3] 75/6 75/13 157/5 terms [19] 3/1 11/9 19/6 36/25 37/10 46/6 53/3 57/4 61/17 76/3 76/21 79/8 83/1 92/5 106/24 116/7 142/25 151/15 154/10 territorial [1] 122/12 test [6] 74/21 74/24 75/4 75/10 75/14 79/20 text [1] 52/24	Thames [1] 122/2 than [25] 8/1 14/25 29/5 29/25 30/10 30/20 32/16 38/17 38/25 39/3 48/25 61/22 65/1 86/7 87/1 88/24 102/18 109/17 109/21 113/6 115/21 117/11 122/25 144/16 144/23 thank [50] 1/5 1/10 1/13 1/24 2/22 3/20 3/24 9/17 21/25 27/23 29/13 43/13 53/17 54/16 55/15 55/25 56/2 65/22 66/2 66/3 73/2 83/17 87/4 88/21 89/2 89/13 89/17 90/7 90/17 93/6 99/24 104/3 104/12 104/13 110/15 112/6 117/14 117/15 117/25 118/1 118/7 118/12 118/18 119/12 143/10 157/22 160/7 160/8 160/13 160/19 thanks [2] 89/10 118/14 that [839] that I [3] 105/4 110/6 111/19 that's [55] 2/5 2/8 5/19 6/6 8/4 8/20 11/5 16/12 19/9 20/8 20/24 21/3 23/7 24/2 25/3 25/9 25/17 28/3 29/6 36/18 43/19 50/23 52/16 53/5 55/6 63/15 63/20 64/23 66/2 66/8 69/12 80/18 82/21 83/7 87/3 87/22 88/14 88/23 90/18 92/17 94/6 97/17 111/24 117/23 120/2 120/12 122/7 122/21 126/20 146/4 147/22 151/11 157/10 157/14 159/16 theft [1] 125/12 their [64] 15/18 15/19 15/23 20/18 22/3 24/10 26/7 26/11 26/25 31/11 31/20 32/5 34/19 36/11 38/14 38/18 46/12 46/15 46/16 47/3 47/10 59/2 60/22 61/2 61/4 61/10 62/13 62/14 62/18 65/9 71/16 72/16 76/17 84/7 84/23 85/18 86/22 86/24 86/25 87/2 121/4 121/8 121/11 130/23 131/9 131/9 131/21 133/3	136/9 138/13 143/12 145/5 145/6 145/8 145/11 145/19 146/13 146/16 150/17 151/24 155/22 155/25 156/1 156/1 them [24] 3/23 5/21 11/8 11/9 20/8 22/19 37/12 46/13 56/15 59/11 72/14 81/8 82/9 84/11 85/20 86/3 87/5 95/25 96/4 98/15 100/25 111/22 143/5 159/10 themselves [4] 128/9 131/17 152/4 153/23 then [73] 2/9 2/16 7/2 7/24 8/25 11/24 13/21 14/14 14/22 20/7 23/21 29/20 33/11 35/12 36/5 41/20 43/10 45/4 45/7 47/6 50/3 54/25 56/8 57/16 65/20 66/20 66/22 67/3 67/6 67/13 67/15 67/20 67/20 69/25 73/7 77/3 77/4 79/4 80/23 86/1 86/2 88/19 106/8 111/2 112/15 113/10 115/20 120/14 121/9 121/12 123/23 125/23 127/21 129/13 129/16 132/9 132/11 133/1 134/11 134/19 135/3 136/25 136/25 137/20 138/19 139/6 140/8 140/18 144/9 144/10 150/18 152/17 155/14 there [263] there'd [1] 145/16 there's [12] 58/19 59/5 60/17 73/7 80/22 104/9 109/16 109/17 125/14 140/19 150/3 150/4 therefore [10] 13/25 14/16 22/11 39/8 49/11 49/13 52/18 53/1 65/2 66/25 these [22] 14/18 15/17 28/11 33/5 34/22 35/2 42/12 56/4 57/23 60/8 72/9 73/22 75/17 84/16 93/16 108/10 114/22 132/17 133/3 142/9 147/10 147/19 they [120] 15/24 16/2 20/9 22/23 22/23 23/14 23/15 23/19 23/22 23/22 23/24 23/25 25/7 25/8 25/20 26/6 27/1 27/17 27/18	30/17 31/4 31/5 31/16 31/23 32/1 32/3 34/17 35/13 35/23 36/10 36/12 37/16 38/7 38/12 38/14 44/8 46/11 46/16 47/2 47/2 47/4 47/14 47/24 53/13 53/15 54/23 56/16 56/18 57/18 58/9 62/11 62/19 65/1 65/8 65/19 66/13 66/21 67/6 67/7 67/10 68/6 71/9 72/7 72/15 75/16 77/7 77/9 79/17 81/20 81/21 82/10 82/11 85/21 86/1 86/4 86/24 86/25 87/5 92/2 92/8 94/24 100/7 101/10 102/13 105/16 107/15 107/18 108/12 109/24 112/20 121/7 121/10 123/8 123/9 123/18 123/21 128/8 128/23 132/18 132/19 133/2 136/9 137/19 137/20 138/3 139/2 144/15 146/18 147/15 148/1 151/17 152/3 153/9 153/12 153/18 154/2 154/3 154/4 158/22 159/4 they'd [1] 15/17 they're [7] 40/6 53/13 56/3 86/1 116/23 143/21 145/20 They've [1] 46/15 thing [7] 41/5 87/19 101/12 139/15 159/2 159/10 160/4 things [17] 13/17 14/13 19/21 20/16 36/23 36/25 38/18 40/16 57/2 79/16 105/7 113/19 129/1 129/25 133/12 140/3 148/17 think [199] thinking [6] 26/13 62/8 63/7 86/17 86/21 106/24 third [7] 61/1 61/8 61/13 62/4 64/9 65/2 127/23 this [215] THOMAS [3] 118/19 118/23 161/9 those [51] 2/21 3/4 4/16 13/18 13/22 14/2 17/11 18/20 24/4 27/4 30/13 37/9 38/8 40/1 41/2 41/12 42/5 47/24 48/13 48/18 50/17 50/19 56/9 57/7 57/21 57/24 60/10 61/11
----------	---	--	---	---

T	68/22 71/18 72/4 73/17 73/17 74/2 77/18 79/18 82/19 87/19 89/12 93/3 93/5 93/25 95/6 95/6 100/10 101/8 102/20 103/21 103/22 105/17 107/6 108/5 110/8 110/8 111/17 111/18 111/19 111/23 113/7 113/8 117/22 124/3 126/2 127/15 128/10 128/22 129/4 129/21 130/7 131/18 144/10 144/21 146/18 149/3 152/5 155/8 156/5 156/11	151/9 151/13 152/1 traditional [9] 3/13 57/14 61/17 61/23 64/13 65/1 85/14 85/15 86/12 trained [5] 22/24 23/15 24/9 27/5 97/15 trainer [1] 121/12 training [22] 21/2 22/3 22/5 22/6 22/12 22/18 24/4 24/20 25/18 25/20 26/2 26/9 26/10 26/12 26/13 41/3 72/8 126/13 129/23 129/23 131/19 140/4 transaction [8] 14/3 31/6 33/8 34/17 126/18 136/16 139/23 157/13 transactional [2] 54/20 54/21 transactions [5] 10/1 31/7 112/10 148/18 148/20 transcript [2] 6/17 119/11 transferred [1] 33/3 transfers [1] 152/8 transformation [14] 3/17 3/19 57/17 58/3 58/5 58/8 61/16 61/19 62/3 64/13 64/16 64/24 85/3 85/9 transparent [1] 111/16 treat [1] 97/15 treated [1] 70/9 trend [5] 17/22 17/25 40/17 125/1 128/1 tried [1] 16/14 trigger [3] 137/4 137/14 144/18 triggered [3] 137/14 137/23 141/25 triggers [1] 138/9 true [7] 1/21 8/4 11/5 106/22 112/22 119/8 135/18 trust [1] 111/22 truth [1] 115/13 try [3] 41/9 115/20 159/1 trying [8] 38/14 42/6 42/24 64/23 126/22 129/5 129/21 151/17 Tuesday [3] 160/10 160/17 160/22 turn [8] 4/21 6/12 69/22 69/25 73/7 87/23 119/3 126/22 turned [1] 5/4 Turning [2] 124/6 147/21	Tuthill [3] 4/11 49/22 52/3 two [27] 2/24 4/4 12/21 16/11 18/13 22/7 22/22 42/1 46/25 56/4 77/24 78/1 82/21 82/22 89/19 97/15 97/18 100/1 100/21 100/24 101/4 112/25 113/19 114/23 115/21 121/5 145/25 two hours [1] 12/21 type [11] 29/15 31/8 57/20 60/8 62/20 63/4 69/16 72/4 84/12 85/4 85/21 types [3] 54/15 57/22 93/22 typically [3] 62/15 73/21 86/7	unhelpful [1] 13/14 Union [2] 137/8 137/9 unique [2] 1/25 24/14 unit [4] 134/8 146/20 146/22 151/7 units [7] 12/1 12/3 135/14 146/17 147/16 150/17 152/9 universal [1] 24/18 universally [1] 23/10 unless [5] 52/19 70/20 106/16 139/22 143/23 unlikely [1] 32/18 unmute [2] 104/11 104/11 unpaid [1] 30/14 unreliable [1] 16/16 unsafe [3] 81/22 116/24 117/10 until [6] 50/24 80/25 89/11 121/10 122/24 160/21 untrained [1] 24/1 unusual [1] 51/13 up [27] 4/17 5/2 6/25 7/14 7/17 20/19 27/4 40/2 48/12 53/11 55/3 55/7 67/16 81/2 90/4 93/17 100/25 110/2 125/23 125/24 137/19 137/23 144/8 144/15 151/8 153/4 158/1 updates [1] 55/19 upheld [1] 82/25 uphold [1] 83/14 upon [9] 3/5 26/7 26/7 61/23 64/25 78/14 105/16 112/10 116/9 urge [1] 71/10 URN [1] 119/11 us [41] 2/23 3/25 4/6 4/24 4/24 5/9 6/13 9/19 17/3 17/10 23/2 27/16 35/6 35/25 45/10 46/8 46/13 49/10 49/17 51/24 57/10 58/15 59/18 61/11 66/16 67/24 81/12 81/16 85/1 87/13 89/22 93/21 96/11 103/15 103/22 104/24 109/12 111/10 118/6 125/4 131/5 use [7] 10/3 10/12 10/14 15/10 69/21 143/12 149/11 used [22] 7/6 8/19 8/23 8/24 9/6 9/7 9/13 9/21 10/22 12/9 35/16 36/18 45/4 84/18 98/1 98/8 107/5 133/11
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U used... [4] 134/9 139/21 150/16 157/5 user [7] 127/7 133/24 134/6 137/15 138/7 139/21 146/16 user' [1] 127/5 users [4] 146/19 146/21 147/6 152/19 using [15] 9/22 10/1 13/15 20/21 20/22 23/24 54/13 75/15 84/25 88/18 116/23 137/15 139/19 143/13 152/19 usually [1] 151/12	135/23 140/2 142/16 158/20 158/21 160/13 via [3] 120/23 153/6 156/21 Victoria [5] 5/17 6/19 46/20 48/5 93/9 view [13] 11/11 46/17 46/17 46/18 50/23 80/11 81/14 111/24 126/13 126/20 128/13 128/17 155/15 views [2] 50/17 50/19 visibility [1] 49/1 visible [2] 9/10 119/6 visit [1] 153/10 visited [2] 133/2 154/3 visiting [1] 34/9 visitors [1] 132/5 vitally [1] 147/1 vocabulary [1] 156/14 volume [2] 59/13 152/10 volumes [1] 148/18 vouchers [2] 134/3 134/13	96/18 129/8 143/7 160/17 we're [6] 1/6 27/8 50/20 73/15 117/19 160/10 we've [17] 8/9 20/20 25/4 40/4 50/17 65/14 68/9 77/19 89/24 90/11 112/25 113/11 114/23 142/19 144/19 150/8 158/20 weak [7] 34/24 36/15 36/21 37/5 37/23 38/1 38/21 weakness [1] 19/16 website [2] 2/2 28/12 Wednesday [4] 10/15 12/21 136/4 150/18 week [9] 9/24 18/24 21/10 27/25 121/10 132/23 135/25 150/21 152/20 week's [1] 134/1 weekly [17] 11/18 11/23 11/25 12/18 13/9 13/10 34/11 40/21 41/16 41/20 41/25 77/19 120/25 136/2 136/11 150/17 151/8 weeks [1] 121/5 well [64] 2/24 9/21 13/20 16/1 16/11 18/2 21/19 25/6 25/9 26/3 27/25 28/21 30/5 31/2 36/1 38/22 42/8 42/23 44/18 44/25 46/6 51/21 62/15 64/15 72/13 72/13 77/1 79/2 80/2 81/25 82/9 87/15 92/14 93/24 95/23 99/12 103/23 105/12 107/2 107/7 107/8 107/13 107/15 107/25 108/4 108/18 108/22 108/23 109/2 109/16 109/20 115/12 117/5 121/22 122/3 122/13 127/13 131/17 147/19 150/1 151/8 158/16 160/7 160/12 went [10] 14/12 22/8 120/24 124/3 125/23 126/13 128/12 130/12 132/18 142/24 were [227] weren't [11] 37/1 47/4 62/12 63/4 71/19 75/22 80/14 82/11 107/15 107/18 123/8 what [122] 4/19 4/24 5/12 5/20 9/6 11/8 14/6 16/23 19/15 19/19 20/8 23/2 23/4	24/8 24/10 25/10 25/11 26/4 26/15 27/17 28/20 31/10 31/24 32/22 35/6 37/20 37/25 38/19 41/9 44/8 47/5 47/5 49/3 49/10 50/13 51/25 52/1 57/13 58/17 58/20 61/17 61/22 62/8 62/20 64/23 66/21 67/21 68/15 69/20 71/4 71/9 72/4 73/19 73/25 74/8 75/12 75/18 79/1 79/24 83/8 83/17 84/6 84/12 85/1 85/21 86/6 86/7 87/13 88/14 89/4 91/22 92/4 94/16 94/17 94/19 95/21 99/6 100/12 101/17 102/13 102/18 108/18 109/20 110/5 111/10 111/18 111/21 117/2 120/17 121/2 121/14 121/16 122/8 125/4 126/4 128/6 130/9 131/24 132/13 133/7 135/25 137/4 139/13 139/19 142/12 143/8 144/3 144/13 145/10 147/10 148/15 149/13 149/15 150/22 151/15 152/11 152/14 155/6 155/19 158/25 159/4 159/6 what's [1] 116/1 whatever [3] 58/9 70/8 81/20 whatsoever [1] 158/22 when [95] 8/12 9/6 11/24 12/15 12/19 12/23 12/25 14/17 17/6 17/18 18/13 18/13 18/15 19/7 20/12 21/10 22/8 22/8 25/7 25/25 26/14 28/19 33/14 34/16 35/15 36/1 36/3 36/13 38/3 39/1 41/1 49/7 49/21 50/19 51/3 60/5 62/21 65/19 68/15 68/19 71/6 75/12 75/17 80/5 82/17 83/7 83/8 83/18 83/18 91/5 91/12 91/16 91/22 93/3 93/22 94/22 102/25 103/24 105/3 106/23 108/5 108/21 121/4 121/24 122/8 123/17 123/22 124/9 125/6 126/7 126/13 128/7 128/12 128/14 129/6 130/12 132/16	133/2 133/6 133/16 133/19 140/9 142/10 142/23 144/5 145/11 145/14 148/19 149/24 151/16 152/15 153/5 154/5 156/14 158/17 when I [2] 132/16 142/23 where [72] 3/25 6/19 8/10 8/22 13/2 13/21 14/5 16/15 16/22 17/3 17/15 17/23 17/25 18/5 18/17 18/24 18/25 19/20 19/21 25/22 26/21 28/9 33/18 33/21 33/22 33/25 34/9 34/24 35/9 35/17 38/11 39/5 43/3 45/6 47/25 48/1 50/6 50/11 59/22 65/6 73/20 74/19 75/23 76/8 77/13 78/8 80/5 80/19 83/21 85/3 87/15 90/14 93/15 98/2 98/23 100/19 102/2 110/13 110/16 113/23 125/14 128/23 134/25 135/1 136/3 138/3 139/21 140/5 146/21 153/1 158/2 158/25 whereas [3] 38/15 136/6 145/21 whereby [2] 153/22 154/19 whether [23] 15/12 29/18 54/23 62/11 67/17 67/24 72/5 74/24 79/20 80/3 80/12 91/2 93/15 94/14 94/24 96/1 96/11 112/12 112/17 112/22 129/12 143/3 148/14 which [57] 3/14 5/10 5/24 12/2 19/11 19/22 23/24 23/25 32/17 36/4 44/1 44/5 56/18 63/1 63/4 63/5 65/18 67/4 68/21 70/15 70/17 75/10 85/6 94/25 111/20 112/10 114/20 119/18 120/24 121/1 121/5 121/19 122/22 123/21 125/8 126/24 129/1 129/3 129/8 129/9 131/1 132/24 135/13 135/24 136/2 136/11 136/13 138/8 143/16 144/14 144/18 148/20 149/7 152/9 154/4 158/3 158/10 while [1] 121/7
--	--	---	---	--

W	113/15 113/22 149/16 149/19 WITN05780100 [3] 1/25 20/20 105/25 WITN08980100 [2] 119/12 141/20 witness [27] 1/14 1/16 1/24 2/1 5/13 20/19 52/21 66/10 91/13 91/19 91/22 91/23 92/12 92/13 92/14 92/20 99/15 113/25 115/6 115/16 117/20 118/13 118/17 118/25 119/14 130/5 160/14 Womble [4] 5/11 5/18 6/20 43/18 won't [1] 100/25 wonder [1] 24/23 word [4] 28/16 56/14 70/5 143/13 worded [1] 64/21 work [12] 9/1 9/10 31/20 52/25 53/4 90/3 107/7 115/18 119/13 122/8 122/25 156/18 worked [6] 2/3 26/8 90/4 123/6 124/9 156/14 worker [1] 96/12 working [15] 42/23 49/22 51/21 93/24 95/24 96/6 107/8 128/5 129/3 129/12 130/21 137/12 146/13 151/22 156/4 works [2] 7/11 11/2 workshop [1] 153/6 workshops [1] 149/23 world [1] 52/7 worse [1] 117/9 would [174] wouldn't [19] 10/6 13/24 21/5 46/1 46/5 46/9 46/10 46/12 59/14 60/2 72/14 79/19 92/15 98/15 103/5 111/22 126/9 144/20 144/21 write [2] 34/25 59/2 write-off [1] 34/25 writing [6] 21/14 34/21 36/25 59/11 83/24 99/8 written [8] 28/6 34/23 35/1 35/18 67/8 70/14 111/1 121/8 written-off [1] 35/1 wrong [4] 13/17 106/17 116/5 120/8 wrote [2] 33/15 84/2	Y yeah [107] 2/15 2/21 5/19 7/2 7/23 8/4 8/18 8/21 8/24 9/15 9/16 10/16 10/18 11/5 11/13 11/25 12/13 15/11 21/23 21/24 29/6 29/10 29/23 30/3 30/22 31/17 33/23 34/8 36/1 36/17 37/15 40/24 47/4 47/9 47/13 47/17 50/4 50/16 50/23 51/6 52/12 53/11 53/15 53/19 54/7 54/13 55/14 55/17 55/21 56/20 58/1 58/14 58/14 63/6 63/19 64/11 64/17 64/23 65/17 65/21 65/25 69/14 69/20 72/1 74/5 75/7 75/16 77/1 77/1 77/23 78/4 82/6 83/9 83/25 84/1 84/1 84/3 84/3 84/4 84/4 84/15 86/6 86/20 87/3 87/3 95/6 95/7 98/20 99/5 99/5 101/3 105/22 107/18 107/20 108/4 108/20 109/18 112/3 113/9 116/22 117/5 118/23 120/18 125/6 128/7 130/10 132/1 year [14] 6/4 30/22 40/9 40/9 80/8 82/21 82/22 83/4 106/2 106/16 111/21 113/12 132/9 151/3 yearly [1] 132/2 years [18] 2/4 4/20 16/11 18/10 22/4 26/15 34/23 42/2 42/25 47/1 68/20 98/11 99/12 119/24 124/9 128/1 137/6 137/13 Yep [1] 11/10 yes [70] 1/5 1/15 1/18 2/8 5/7 10/5 10/13 12/6 14/9 15/25 16/17 19/6 25/13 26/16 30/2 37/19 63/20 64/20 66/2 69/7 73/11 74/24 78/22 83/15 83/22 89/1 89/9 90/10 96/5 100/5 104/8 112/5 117/23 119/2 119/5 119/10 120/4 120/6 120/12 120/15 122/7 122/21 122/25 123/5 123/9 123/14 124/11 124/11 124/18 124/22 125/20 130/8 136/23	137/6 142/16 144/17 149/2 151/5 151/11 151/14 153/3 153/24 154/21 154/25 157/9 157/9 157/20 159/7 159/12 160/10 yet [1] 24/18 you [575] you'll [2] 102/2 115/1 you're [18] 3/21 15/8 19/7 25/9 43/22 83/2 83/23 86/17 87/20 94/4 99/21 101/2 111/10 111/24 144/13 145/24 148/3 154/9 you've [29] 7/5 10/21 13/10 14/5 32/6 39/17 58/25 59/1 63/8 69/3 80/14 83/18 87/10 91/2 91/3 92/10 98/21 102/18 103/8 104/18 105/5 109/3 114/21 114/22 138/8 145/12 151/12 153/16 160/4 your [104] 1/10 1/19 1/21 5/2 5/6 6/10 8/23 12/6 14/19 16/21 18/16 19/6 19/16 20/19 24/2 25/13 26/1 26/13 28/19 29/20 32/6 39/18 40/2 40/4 40/10 41/22 43/18 44/23 46/17 46/17 48/7 52/16 52/17 52/21 55/15 58/25 59/7 66/10 68/22 69/5 73/6 78/23 78/24 79/25 83/1 83/18 90/19 96/8 96/11 96/18 96/21 98/7 98/18 99/3 99/15 100/9 104/20 104/23 104/25 105/24 106/2 106/16 107/13 108/24 109/3 111/2 111/24 112/15 113/10 113/20 116/7 118/21 118/25 119/9 121/2 122/8 124/7 124/19 124/20 128/4 130/5 132/22 139/17 139/17 141/18 142/3 142/9 143/7 144/6 145/1 145/12 148/5 148/7 149/8 149/10 150/15 151/18 153/16 155/2 156/12 156/14 157/11 159/16 159/21 yourself [5] 12/9 16/19 74/8 92/10 96/15	23/16 zoom [3] 7/15 55/24 89/6
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