

Friday, 12 May 2023

(10.00 am)

RODERICK MARK ISMAY (continued)

Questioned by MR BEER (continued)

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

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

MR BEER: Thank you very much.

Good morning, Mr Ismay. Can we pick up where we left off last night with the email chain that we were looking at before the technology failed us. It was POL00055100. Thank you.

Just to refresh your memory, because it was last night, on the second page of this document you'll remember that the defence solicitor, Issy Hogg, had set out three requests. That had worked its way through to Jarnail Singh, we can see from the top of the page, and then we go to page 1 at the bottom. We can see that, on behalf of Jarnail Singh, that email was forwarded to Mr Longman and counsel, Mr Tatford, and we look at the top of the page, we can see, the second email down, Mr Winn, who receives the chain, replies to Mr Longman:

"Rod Ismay, the head of P&BA, is not happy

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have -- given the importance of the matter, I would have expected Jarnail to have been directly in contact and, because the request was specified by the defence, which may well have been a very valid request to make, but I would have expected the Post Office Criminal Law team to have been the ones explicitly saying to me this -- "Can you do this, Rod?" which, of course, I would have responded to.

You have shared an email that was on the screen, a couple of screens ago, I think it's got a phrase in it that says, "Jarnail, please send me your instructions". I find that kind of a puzzling phrase, it's not like "Jarnail, we've agreed and you have agreed that Mr Ismay should provide certain things". It says, "Please advise me of your instructions", and that to me sounds like "Well, there's some discussion going on here".

So I think when Andy Winn was at the hearing he did say what you've said and, before that, I think he said, "I know Rod, I think he would have been seeking clarification", he perhaps didn't understand the question. And then when you asked him the question again he proceeded,

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at the prospect of an open-ended invite. He has asked the question of what are the legal parameters we're working with. Simplistically, if we refuse or impose conditions do we lose the case? I think we need more guidance on how something like this might reasonably operate."

I had asked you about what Andrew Winn himself had said concerning this email chain, and he told the Chairman that he understood your reply was a reply that was seeking to close down the closure request as much as possible and I asked you whether that was your intention. You said last night:

"No, there were two things here: you would expect the Criminal Law team to be overseeing the compilation of whatever needed to be submitted, and not for there to be a side conversation between me, as part of the organisation, with the defence lawyer. So I felt that the request should be coming to me from the Criminal Law team."

Just dealing with that answer first, the request was coming from the Criminal Law team.

A. It was coming indirectly from the Criminal Law team. I was surprised that Jarnail -- I would

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as you said, exactly as you said earlier.

But I was seeking clarification because I was surprised not to be being approached by Post Office Criminal Law team and I certainly didn't think that -- didn't feel appropriate to me to be engaging in direct correspondence with the defence team. I would have absolutely expected the Post Office criminal lawyer to specify what was needed to gather that from me, or to facilitate any visits that were necessary, and for that to be managed through a single point of contact who was acting on that case. That was absolutely the fundamental reason for it.

Andy -- Andy's notes also said "Rod wasn't happy", so I think that's the first reason and yesterday I said there were going to be two reasons I wanted to expand on. Firstly, was what -- was that, the approach of, I believe, the Criminal Law team involvement. The second, I think was just that, of course I wasn't happy about another review, yes, because at the time we were gearing up for Royal Mail privatisation, I've got lean process improvement reviews being done in my team, I've got business

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1 transformation projects going on, which entailed
2 sensible process reviews in different teams.
3 But I was feeling a bit like my team was
4 constantly subject to review and, therefore,
5 this, which, if Jarnail agreed it was necessary,
6 was an absolutely important review that I should
7 facilitate but Jarnail hadn't told me that and
8 I was already on the receiving end of a number
9 of active reviews for business process
10 improvement purposes, which were proving very
11 demanding in my team.

12 So I wasn't happy about the idea of another
13 review but, if Jarnail came and said, "Rod, this
14 is what the Post Office Criminal Law team feel
15 needs doing", then absolutely I would have
16 followed that. But I hope that gives the
17 context as to why Andy perceived that I wasn't
18 happy at the request there.

19 **Q.** That reason, that you weren't happy with the
20 process being followed, that the criminal law
21 team should give instructions to their client,
22 you, as to as though what examination should or
23 should not be permitted didn't find its way into
24 this email chain, did it?

25 **A.** No, the --

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1 document, I think her request was for access to
2 systems in the Midlands. Yeah. So that would
3 have meant Chesterfield, I think. That would
4 have meant the Product and Branch Accounting
5 Team and, therefore, if Jarnail has passed this
6 to Jon, Jon had come to the right area to ask
7 a question, but the nature of the whole question
8 didn't feel like the Post Office Criminal Law
9 team coming and saying, "We are leading the
10 collation of the response in this case and Rod,
11 within the construction of Post Office Limited's
12 defence pack -- Post Office Limited's
13 prosecution pack -- please can you facilitate
14 this?"

15 I was receiving something third hand
16 suggesting that I should agree to something with
17 a defence solicitor which I -- my perception is
18 that that wouldn't be how a case would be
19 handled. There would be a -- the law team in
20 the Post Office would manage the relationship
21 between the two law teams.

22 **Q.** Just scrolling up to Mr Singh's email at the
23 foot of the first page, thank you. He says in
24 the second line:

25 "Could you please be kind enough to let me

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1 **Q.** The process issue?

2 **A.** I don't think a clear instruction from our
3 Criminal Law team to me came to me to say what
4 to do. I was copied in on an email that you've
5 shared there that says, from the defence
6 solicitors, "We await your instructions". Well,
7 I don't know what that means.

8 **Q.** Well, hold on, if we look at the foot of the
9 page, please, the email at the bottom. Jarnail
10 is asking Mr Longman -- who worked for you?

11 **A.** Yeah, yeah -- no, he didn't at that time.

12 **Q.** Who did Mr Longman work for at this time?

13 **A.** Jon, I think, would have been part of the
14 Security team.

15 **Q.** They weren't within your area of responsible by
16 this time?

17 **A.** No, and, in terms of the Security team, the
18 investigations part of the Security team had
19 been part of my remit in 2005 for about a year.
20 There's another whole part of Security but --
21 Jon was not part of my team, no.

22 **Q.** Why did this come through to you, then, to your
23 team?

24 **A.** So Jon -- well, I think that Issy Hogg's request
25 on the further down below, page 2 or 3 of this

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1 have your urgent instructions as to the access
2 and information she is requesting."

3 That's a perfectly normal request, isn't it,
4 from a lawyer to their client?

5 **A.** Well, it might be in legal language but, to me,
6 to say, "Let me have your urgent instructions"
7 could be "Are you instructing me to do something
8 or not?" That is not language that means
9 something to me as a non-lawyer, "your urgent
10 instructions".

11 **Q.** Mr Winn told the Chair that the reasons that you
12 gave for wishing to shut down as much as
13 possible this disclosure request were that,
14 firstly, you believed the examination wouldn't
15 produce anything, ie the defence examination
16 sought wouldn't produce anything; and, secondly,
17 it would create more questions than it would
18 answer. Is he correct that those were the
19 reasons that you gave for not wishing to allow
20 the defence the access to the systems that they
21 sought?

22 **A.** The reasons -- so that and the other two reasons
23 that I've given already, yes. So, given that
24 the allegations were being made about the
25 Horizon System, the idea of doing a review in

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1 the Product and Branch team, who were not using
 2 Horizon, would seem to me to not have been
 3 looking at the particular system that
 4 allegations were made about and, therefore,
 5 would have continued to have questions after
 6 that review because we wouldn't have been able,
 7 in my team in Chesterfield, to have shown or
 8 answered questions about the Horizon System.

9 **Q.** The request, if we go to the second page,
 10 concerned access to the system in the Midlands.

11 **A.** Right, okay.

12 **Q.** Secondly, it concerned access to the operations
 13 centre in Chesterfield.

14 **A.** Right, yeah.

15 **Q.** Thirdly, it sought access to system change
 16 request, Known Error Log, new release
 17 documentation, to understand what problems have
 18 had to be fixed. It was a broader request than
 19 simply access to systems in Chesterfield, wasn't
 20 it?

21 **A.** That was a broader question than Chesterfield
 22 systems because, to the best of my knowledge,
 23 the Known Error Log, I think, was a phrase about
 24 Horizon Issues. I think if the SAP system that
 25 my team used, if it had an issue, I don't think

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1 a dialogue with subpostmaster colleagues in
 2 Chesterfield.

3 **Q.** When was the Second Sight process?

4 **A.** In respect of this timeline --

5 **Q.** Later.

6 **A.** Right, okay, yes, I'm sorry.

7 **Q.** By years?

8 **A.** Yes, I'm sorry, that would have been later, I'm
 9 sorry, yes.

10 **Q.** Inviting four postmasters into Chesterfield
 11 a couple of years later, not really the same as
 12 allowing an expert access to a system and access
 13 to documentation to understand any errors or
 14 bugs within it, agreed?

15 **A.** Yeah, I agree that and I'm sorry about -- with
 16 all the things that I was involved in, I'm sorry
 17 that I've mixed up the timeline there.

18 **Q.** Was your concern here that an independent
 19 investigation may show that there were issues of
 20 unreliability with Horizon?

21 **A.** No, no, my concerns were about the centrality of
 22 the Criminal Law team to lead on the dialogue
 23 here. My concern was, I suppose, a workload
 24 thing of how many reviews my team were already
 25 involved in, with different people coming to

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1 that would have been called a Known Error Log
 2 item. So I think that third bullet point reads
 3 to me as being a Horizon-related topic.

4 **Q.** Putting it bluntly, Mr Ismay, was the real
 5 reason that you didn't wish to give access that
 6 you were concerned that this might be another
 7 form of independent review, exactly the type of
 8 independent review or examination that you and
 9 your colleagues within the Post Office did not
 10 want to happen?

11 **A.** No. No. It wasn't. And I think there's
 12 something that's referred to in one of the other
 13 documents in the packs but, somewhere in the
 14 chain of events around this time, we had -- the
 15 Post Office had a conversation, I'm not sure
 16 with who, when I say "we", somebody in the Post
 17 Office had conversations with subpostmaster
 18 representatives which had led to a small working
 19 group of subpostmasters, active subpostmasters,
 20 coming and looking at some of the things in
 21 Chesterfield, so I recall a number of meetings
 22 where, I think, four subpostmasters came in.
 23 And I think it was related to the Second Sight
 24 process and, therefore, I'd already had a kind
 25 of a scenario of very helpfully having

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1 review processes in my team, and that
 2 fundamentally was why I -- my chin would have
 3 dropped at the prospect of another review in the
 4 team.

5 **Q.** If we go back to the first page, please, we can
 6 see that Mr Winn's email in the middle of the
 7 page reporting his conversation with you is
 8 dated 27 July 2010.

9 **A.** Right.

10 **Q.** So the conversation to which it refers
 11 presumably would have occurred whilst you were
 12 writing your report, remembering your report's
 13 final version has a date of 2 August on it. So
 14 it's within the same week.

15 **A.** Yeah, it probably is, yeah.

16 **Q.** Did the fact that you were being asked by the
 17 managing director of the company to write
 18 a report that gave Horizon a clean bill of
 19 health influence your decision not to allow, at
 20 the same time, an independent defence expert
 21 access to the system?

22 **A.** No, and I think I'd just like to expand on the
 23 no there. So I think my reason was the two
 24 things that I've referred to a number of times,
 25 about Criminal Law team and the number of

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1 reviews in my team. I think, actually, you've
 2 helpfully pointed out to me that this was in the
 3 week before my other report summation was dated,
 4 which I'd forgotten. So I think, given that
 5 I was -- described yesterday that I was burning
 6 the midnight oil to collate the report for David
 7 Smith, I think that would probably be another
 8 reason why a request coming in for a review in
 9 Chesterfield at the same time as I was burning
 10 the midnight oil on that other report would be
 11 another reason for me coming across not happy at
 12 the prospect of an open-ended invite.

13 **Q.** Does the fate of a defendant and their request
 14 for access to a computer system turn on how
 15 tired you were?

16 **A.** No, it certainly doesn't but I think it turns on
 17 what the Criminal Law team sued be collating for
 18 the Post Office and asking me to gather, not for
 19 me to have a relationship directly with the
 20 defence team. I think -- I'm sure the situation
 21 for the defendant in this case is awful and I'm
 22 really sorry for all the chain of events that's
 23 happened here. This is horrible. But in
 24 a legal process, my understanding is that the
 25 Criminal Law team and the Post Office lawyers

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1 Just remembering the chronology: that last
 2 exchange ended on 27 July; your report,
 3 2 August.

4 **A.** Yeah.

5 **Q.** We're now on 13 September.

6 **A.** Okay.

7 **Q.** Still dealing with, in the subject line there,
 8 the Seema Misra case.

9 **A.** Yes.

10 **Q.** We can see this is an email from Zoe Topham, the
 11 Former Agents Debt section within the Post
 12 Office, to Mr Longman. You're neither a sender
 13 or a recipient of it but you'll see, in
 14 a moment, were referred to.

15 **A.** Yes.

16 **Q.** You'll see it says:

17 "Hi Jon

18 "The last update I had above was in July,
 19 the Defence Solicitors had requested that they
 20 had access to the operations in Chesterfield.
 21 This was discussed by Andy Winn/Rod Ismay.
 22 I have today spoken with Andy Winn and he has
 23 informed me that Rod had made a decision not to
 24 allow this ... could you ... update me with the
 25 latest progress on the case."

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1 should be the representatives facing the defence
 2 solicitors and that they, the Post Office
 3 solicitors, should be gathering the information
 4 not for *ad hoc* individuals around the
 5 organisation to be initiating separate
 6 conversations, separate to a law team, who were
 7 trying to contain -- trying to compile
 8 a consistent and comprehensive pack.

9 **Q.** Nobody is asking you to have contact with the
 10 defence solicitors. Nobody is asking you to --

11 **A.** They are. They're asking me to accept
 12 an open-ended invite of somebody coming to
 13 Chesterfield.

14 **Q.** They're asking for your instructions, something
 15 lawyers do to their clients every day of the
 16 week.

17 **A.** Well, I think I've explained that that phrase of
 18 asking instructions doesn't mean anything to me.
 19 That is not a phrase that I am familiar with.
 20 Asking your instructions leads me to think
 21 "Well, my instruction is: go and ask the
 22 Criminal Law team to come back and tell me what
 23 the Post Office team think I need to provide".

24 **Q.** Can we turn on, please, to POL00055225. Thank
 25 you.

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1 You saw from the last email that it was said
 2 that you weren't happy and you were asked
 3 a couple of questions. In the interim, had you
 4 made a decision, as this email records, that you
 5 would not allow the access sought?
 6 **A.** I don't think so. I think if the Post Office
 7 defence team -- no, if the Post Office
 8 prosecution team had come and said that
 9 something needed doing, I would have absolutely
 10 have followed it. I have got no idea what other
 11 conversations, if any, happened after the one
 12 that's referred to in the July chain and up to
 13 this one. I can't remember the things and it's
 14 quite possible that this email was just
 15 reiterating that feelings that came out from the
 16 conversation before. I don't -- genuinely don't
 17 know whether I had another conversation in
 18 there, but I was not in a position to be able to
 19 say what should or should not happen in respect
 20 of information gathering for a prosecution case.
 21 It was absolutely for the Post Office solicitors
 22 to say what needed to happen. I could not make
 23 a decision like that. And I would have thought
 24 that, if I had attempted to do something like
 25 that, the Post Office solicitors would have

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1 overruled me. So --

2 **Q.** Would have?

3 **A.** Overruled me. So I would not have been in

4 a position to make a decision about -- if

5 a matter was agreed between the prosecution team

6 and the defence team to say that something

7 should happen, then that would not be something

8 for me to make a decision on. That would be

9 something for me to deploy.

10 **Q.** Can we move forward, please, to POL00055418.

11 An email principally between lawyers, Mandy

12 Talbot to Jarnail Singh, but copied to you,

13 dated 8 October 2010. So this is a few months

14 after you've written your report, a few months

15 after those email exchanges --

16 **A.** Yes.

17 **Q.** -- that we've looked at.

18 **A.** Yes.

19 **Q.** This is the Friday before Seema Misra was due to

20 go on trial on the Monday morning.

21 **A.** Okay. Right.

22 **Q.** You'll see that Mandy Talbot emails Jarnail

23 Singh and says:

24 "Mike and Rod are also very interested in

25 any developments at the trial next week which

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1 that report to Dave Smith, where he was asking

2 for positive reasons to be assured about

3 Horizon, obviously this would be very much in my

4 mind.

5 There's been several bits of correspondence

6 you've shared about this case so this very case

7 was very much in my mind. I'd just been asked

8 by the MD to produce that report and, therefore,

9 it was probably in my mind at the time, "Well,

10 maybe Dave might ask me to collate something

11 else", and therefore I would want to be aware of

12 any progress on something that was going on,

13 given that the MD had very recently asked me to

14 do a report on that.

15 So I would think that what I've just said

16 would be the reasons why I would have had

17 an interest in it, given that obversely, there

18 was a lot of press analysis of it, then, from

19 Mandy's point of view, she would be aware there

20 was lots of press in and may have conflated me

21 thinking about press with me thinking about

22 having written a report to the managing

23 director.

24 So I would -- that is what I think my

25 interest would have been that would have caused

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1 impact on Horizon. You promised to let me know

2 if anything unfortunate occurred in respect of

3 Horizon. Please can you copy Rod and Mike into

4 any messages. Incidentally I assume you have

5 briefed external relations. Can you let us know

6 who you have briefed because Mike and Rod may

7 wish to have input into any story relating to

8 Horizon. They may give you a call ... for

9 an update. Incidentally Postmasters for Justice

10 met with the Minister this week and were

11 accompanied by Issy Hogg and the lady from

12 Shoosmiths."

13 You were evidently interested in public

14 relations here because you are recorded as

15 having a possible interest in inputting into

16 a story about Horizon; is that right? You

17 wanted to be part of the story making for

18 Horizon?

19 **A.** No, I didn't want to be part of the story

20 relating to Horizon. Let me add some more

21 things to that. So Mandy's written an email

22 here, this isn't an email from me that says I'm

23 interested in writing a story. However, given

24 that I'd been asked by Dave Smith only a month

25 or so earlier, or two months earlier, to collate

18

1 me to have been on the radar for being keen to

2 have updates on the outcomes of the case, having

3 so recently done that summation compilation for

4 Dave Smith.

5 **Q.** Or was it that, so long as nothing unfortunate

6 happened at the trial, you saw it as

7 an opportunity to minimise any bad press and go

8 on the front foot and put a story out?

9 **A.** No. So, as you've just said, "or was it

10 an opportunity", and it wasn't, I think, that it

11 was for the reasons that I've stated before

12 that. That was my rationale, not for that other

13 opportunity.

14 **Q.** Was it that, by now, you had become one of the

15 key figures within the Post Office who was

16 a leader on defending the integrity of the

17 Horizon System. Having written your report, you

18 were going to be the flag bearer, or one of

19 them, for the integrity of the Horizon?

20 **A.** I think I was clearly seen as somebody who was

21 able to talk to other -- lots of parts of the

22 organisation to pull together a summary related

23 to this situation. I think it -- I asked

24 myself, looking back at it, I was managing the

25 Product and Branch Accounting Team which was

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1 inherently very close to subpostmaster and other
2 Post Office transactions, but I was not in
3 charge of the Horizon System.

4 So I do ask myself several times "How on
5 earth was it that I ended up being the one who
6 was invited to collate this report?" And
7 I think that was because I had got a decent
8 understanding of lots of stuff across the
9 organisation but, frankly, why wasn't it an IT
10 person who collated that report about a system?
11 I don't know. It was me. Dave came to me to
12 ask me to do it.

13 So, yes, I'm clearly somebody who had got
14 a level of understanding about the Horizon
15 System, a level of understanding about
16 transactions in branches. I'd got relationships
17 with a number of, if you like -- I think we
18 talked about the NFSP meetings, and things, and
19 some other materials. So there's lots of
20 activity where I was meeting people to try to
21 look through the eyes of subpostmasters.

22 And I realise a phrase, such as I've just
23 used then, you might rightly, and some other
24 people may say "Well, that's in awful phrase to
25 use, given the awful events that we've got

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1 that I did not own, and which, when we've had --
2 at the end of my witness statement, asked for
3 other reflections on things for the past, I made
4 a comment about I think moving forward it would
5 be really important for the organisation to be
6 clear about the individuals who are the owners
7 of systems in the organisation, because I think
8 structurally it would be quite clear, I was
9 managing a back office finance team. That would
10 not be the owner of the Horizon System. Why,
11 therefore, were so many things coming to me?

12 And I know, across the whole of social media
13 there's a number of people referring to the
14 "Ismay report". Well, I collated something for
15 lots of people across the organisation. I'm
16 increasingly mystified, looking back, where were
17 IT in there? Why was it me that it was me that
18 was the collator of this? But I tried in the
19 best faith to do the best compilation of things,
20 and the best response to matters that were going
21 on, but was always of an understanding that
22 there was a lead from the Criminal Law team in
23 these.

24 **Q.** Rather than the reasons that you've given, did
25 you want to have an input into the story to set

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1 here", but I was very much trying to do that in
2 my role and that probably made me, as a back
3 office finance person, sound unusually keen on
4 understanding things at the front end because
5 I was passionate about Post Office, as I was
6 passionate about -- that's why I joined the Post
7 Office in the first place.

8 This was an organisation right at the heart
9 of the community, part of the national interest.
10 The previous Finance Director had described it
11 as -- something about Post Office is fundamental
12 to social cohesion.

13 Me, I was humbled to have the opportunity to
14 work at the Post Office and I'm horrified that
15 all these events have happened and that I'm in
16 here talking in this situation of this awful
17 chain of events that's happened here. But, yes,
18 in the Post Office, I think I was recognised as
19 somebody who'd got a significant amount of
20 understanding of things to comment on.

21 But it mystifies me sometimes, looking back
22 at it, just to think that why was it that me,
23 managing a back office finance team, was the
24 person asked to collate some of these things,
25 and to be answering questions about a system

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1 the narrative relating to Horizon because you
2 were now seen as a pliant individual, a good
3 company man, who would deliver the goods by
4 producing a one-sided, unbalanced piece, and you
5 wanted to get that one-sided, unbalanced piece
6 out into the media?

7 **A.** No. As you say, is there another scenario and
8 was that the scenario? And no, and for the
9 reasons that I've articulated earlier, no.

10 **Q.** Who was Mike Granville? What role did he
11 perform?

12 **A.** Mike, his role was -- I know the kind of nature
13 of -- so he would have had a lot of contact with
14 BIS. I think his role title was probably
15 something like Stakeholder Relations. So he --
16 I know he had a lot of discussions with
17 stakeholders, such as the NFSP, and I think some
18 of the departments for business and innovations
19 and skills, or its predecessors, I think he
20 would have had conversations with people in that
21 organisation, the shareholder organisation.

22 **Q.** Were you reporting back to any directors at this
23 time about Seema Misra case and your role in it?

24 **A.** I don't remember reporting to directors about
25 that. I don't know. But I also feel, whilst

24

1 there's a number of bits of correspondence we've
2 got here, I didn't have a -- there's clearly
3 some major correspondence here that refers to me
4 in the Seema Misra case but you've said me
5 being -- having a major role in the case, well,
6 I didn't. I wasn't doing a lot to do with this
7 case. I'd received a question, which is
8 a really important question which we've already
9 talked about, when I wasn't actually doing
10 anything.

11 I was continuing to be managing a back
12 office finance team, settling with clients and
13 gearing up for Royal Mail privatisation and
14 separation of Post Office functions, and this
15 case was going on, and I had these questions
16 that came to me, but I wasn't somebody who was
17 doing lots to do with the -- this case. And
18 I say that because that would be true of any
19 case. I wouldn't have been myself doing things
20 to do with the case.

21 **Q.** Can we turn on, please, to POL00044997. Can we
22 look at the email at the foot of the page,
23 please. Thank you. It's an email from Jarnail
24 Singh. You can see that it's rather strangely
25 formatted in the top right-hand corner --

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1 You'll see the title to the email "Attack on
2 Horizon". You'll see in the second line, it
3 refers to an attack on Horizon and the claim
4 made that the Post Office was able to destroy
5 the defence allegations. Is that language
6 reflective of the culture prevalent at the time
7 concerning Horizon, namely, in response to
8 a defendant who maintained a defence to the
9 criminal charges of theft against her was
10 thereby seen as attacking Horizon, an attack
11 which needed to be destroyed?

12 **A.** I think that's unpleasant language to be using
13 and --

14 **Q.** Presumably you replied along those lines?

15 **A.** I don't know. I'm looking at that now and
16 thinking that's unpleasant language. I don't
17 know what reply, if any, I made to that.

18 **Q.** So a defendant who deigns to suggest that the
19 computer system which is being used to convict
20 her is said to be mounting an unprecedented
21 attack on the system. Did you regard this as
22 an inappropriately gleeful email?

23 **A.** Well, I certainly do, looking at it as we have
24 here. I don't know what I thought at the time
25 but I'm looking at that thinking the subject

27

1 **A.** Yes, yeah.

2 **Q.** -- dated 21 October at 2.58 --

3 **A.** Yeah.

4 **Q.** -- to a long list of people and, amongst them,
5 is you.

6 **A.** Yeah.

7 **Q.** The subject is "[The Crown] v Seema Misra --
8 Guildford Crown Court -- Trial -- Attack on
9 Horizon", and Jarnail Singh wrote:

10 "After a lengthy trial at Guildford Crown
11 Court the above named was found Guilty of theft.
12 This case turned from a relatively
13 straightforward general deficiency case to
14 an unprecedented attack on the Horizon System.
15 We were beset with unparalleled degree of
16 disclosure requests by the Defence. Through
17 hard work of everyone, Counsel Warwick Tatford,
18 Investigation Officer Jon Longman and through
19 the considerable expertise of Gareth Jenkins of
20 Fujitsu, we were able to destroy to the criminal
21 standard of proof (beyond all reasonable doubt)
22 every single suggestion made by the Defence.
23 "It is to be hoped the case will set
24 a marker to dissuade other Defendants from
25 jumping on the Horizon bashing bandwagon."

26

1 title shouldn't even have words like "attacking
2 Horizon" in the subject of it. It should have
3 simply been "[Case title] update", and I think
4 that's not nice -- that's unpleasant language to
5 have used.

6 **Q.** The last sentence:

7 "It is to be hoped the case will set
8 a marker to dissuade other defendants from
9 jumping on the Horizon bashing bandwagon."

10 No doubt that was a sentiment with which you
11 very much approved at the time?

12 **A.** I'd been involved in collating that thing about
13 the reasons to be assured about Horizon.
14 I would hope that I wasn't using language like
15 "Horizon bashing". I was focused on reasons for
16 integrity of the system and, clearly, there's
17 a number of things that have come out that are
18 contrary to the concept of integrity of it, for
19 language like "Horizon bashing" isn't -- well,
20 it is unpleasant language to use again.

21 **Q.** But this senior lawyer within the Criminal Law
22 Division has sent his email to quite a number of
23 the top slice of managers within the Post
24 Office, hasn't he?

25 **A.** Yes, some of the people in there are, yeah,

28

1 senior executive team, even.

2 **Q.** Wasn't that the culture of the time: If we get
3 a within like this, we should weaponise it to
4 dissuade anyone else from daring to suggest that
5 there's anything wrong with Horizon?

6 **A.** I don't sort of remember it as being a culture
7 of weaponisation but there was certainly
8 something you shared yesterday that was kind of
9 a similar tone to it and that was unpleasant.
10 So I can see that, as you lift a number of these
11 bits of correspondence, it does not sound like
12 an acceptable tone of voice.

13 **Q.** Do you know why Mr Singh would be concerned
14 about the need to deter others?

15 **A.** No. Mr Singh, I think, would be -- should be
16 concerned to have the right evidential objective
17 process going through cases.

18 **Q.** Yes. I'm asking you whether you would know of
19 any reason why a senior lawyer within Post
20 Office's Criminal Law Division would express
21 a wish, a hope, that the outcome of one case
22 would deter others from making suggestions about
23 the integrity of Horizon?

24 **A.** No.

25 **Q.** Did you know that prosecutors in criminal cases

29

1 subpostmasters, and so many people had got
2 different roles of a large part of the UK
3 economic cash going through that organisation.

4 So there'd be lots of reasons why people
5 would want to be confident in the system but
6 when one gets down to the level of a specific
7 case in a branch, as you've said, that should be
8 done objectively. So there would be commercial
9 reasons to want to be assured about the system
10 but I would hope, and I would hope, that it was
11 actually being objectively done case-by-case.
12 So my answer to that is, yes, there's commercial
13 reasons but I would hope that they didn't
14 manifest themselves in the conduct of the case.

15 **Q.** Can we look, please, at POL00113909. If we just
16 look at the foot of page 1, please -- thank
17 you -- you'll see an email from Mandy Talbot to,
18 amongst other people, you.

19 **A.** Yeah, yeah.

20 **Q.** We're going back four years here to 2006 in the
21 Lee Castleton case?

22 **A.** Right.

23 **Q.** I just want to see whether this helps us in any
24 way with the answers that you've just given?

25 **A.** Yeah.

31

1 are supposed to act as ministers of justice --

2 **A.** Um --

3 **Q.** -- meaning that they don't secure a conviction
4 at all costs, amongst other things?

5 **A.** That's not a phrase that I know, but it totally
6 makes sense to me. So what you are saying,
7 I would say, yes, I would agree with that.

8 **Q.** And that having a business-driven motive for
9 securing a win in a criminal case would be
10 inappropriate?

11 **A.** Yes.

12 **Q.** Is that what was going on here: that there were
13 business drivers here not wishing to let the
14 outside world know that there were problems with
15 the integrity of Horizon's data and that any
16 opportunity to dissuade anyone from questioning
17 the integrity of the system should be grabbed
18 with both hands?

19 **A.** No, and I'll just add to that sort of thing, no,
20 it shouldn't and I would like to think that it
21 wasn't being done in that way. But the
22 organisation, yes, the Post Office commercially
23 would want people to have got confidence in its
24 point of sale system because all of its commerce
25 clients, and its customers, and its

30

1 **Q.** So this is in the run-up to the trial. The Lee
2 Castleton case commenced its hearing in the High
3 Court on 6 December 2006 and this is 9 November
4 2006, so it's about a month before.

5 **A.** Yeah, yeah.

6 **Q.** You'll see that you're copied in.

7 **A.** Yes.

8 **Q.** In fact, the direct addressee. What had the Lee
9 Castleton case got to do with you?

10 **A.** Well, I don't know at that time. So I must have
11 left the -- I had the investigations team and
12 Branch Audit Team but I think I'd --

13 **Q.** You'd moved on by now?

14 **A.** I'd moved on by then so I was in the Product and
15 Branch Accounting Team, so what that the
16 Castleton case got to do with me? So I don't
17 know whether we'd got a -- well, there was --
18 well, there was probably a debt -- an alleged
19 debt arising at the start of this case that
20 would have been something, ultimately, that
21 either my Current Agents Debt team or Former
22 Agents Debt team would have had a role in.

23 Mandy may have included me on it because she
24 may have been used to including me on things in
25 my previous role. So many people change jobs so

32

1 many times that sometimes people in -- who have
 2 moved on are still included on the previous
 3 address list. But my team would have had --
 4 I would expect my team, Product and Branch
 5 Accounting, would probably have been asked at
 6 the branch audit to confirm if there were any
 7 transaction corrections pending at the time. So
 8 I imagine my team would have had a question
 9 asked to them in the conduct of -- back at the
 10 branch audit stage, and that may have led to me
 11 being included on this.

12 Q. If we go over the page, please. There's a blank
 13 page, sorry. Scroll down. Thank you.

14 I'm just going to give you some context here
 15 by reading this:

16 "Our original claim against Castleton was in
 17 the region of £25,000 and he entered a defence
 18 and counterclaim for £250,000 but of more
 19 concern brought the whole validity of the
 20 Horizon System into question. As a result we
 21 have expended a lot of legal costs to ensure
 22 that the defence to those allegations is as
 23 perfect as possible.

24 "On Friday Castleton's solicitors amended
 25 their defence/counterclaim to reduce their

33

1 Castleton was dishonest there is no problem with
 2 us agreeing to this demand. We believe that he
 3 is seeking to go back to work in the city and as
 4 such a statement from us could be very valuable
 5 to him.

6 "Thirdly the offer is defective in that it
 7 does not mention interest ...

8 "... no offer has been made to give a
 9 declaration to the effect that he withdraws all
 10 his allegations about the Horizon System."

11 Then scrolling down:

12 "... we made a Part 36 offer to him in
 13 January ... stating if you pay our full claim we
 14 would not seek our costs which he rejected, he
 15 is now applied to pay our costs on the indemnity
 16 not the standard basis since that date. If
 17 costs are awarded on the standard basis then
 18 traditionally the successful party would recover
 19 between 60-65% of the costs expended. Any
 20 dispute is resolved in the favour of the paying
 21 party. Costs on the indemnity basis means one
 22 recovers almost all of ones costs and any
 23 dispute is resolved in favour of the receiving
 24 party. So there is quite a difference between
 25 the two.

35

1 counterclaim to £11,000.

2 "Last night our barrister received
 3 a compromise offer from Castleton's solicitors
 4 probably brought on by the fact that they are
 5 obliged to serve their statements on Friday
 6 together with their accountants report. We
 7 suspect that their accountants report has not
 8 supported their claim.

9 "The bare offer is as follows:

10 "they offer the sum of £22,350 in settlement
 11 of our claim

12 "our costs on the standard basis

13 "they want us to agree to pay rent or get
 14 the temp to pay rent for the continued occupancy
 15 of Marine Drive

16 "they want us to pay the wages of the
 17 assistant employed there

18 "they want a letter from us stating that
 19 proceedings were issued purely to recover a debt
 20 and that there was no allegation of dishonesty."

21 She says:

22 "Firstly I think we can all agree that their
 23 demand 3 and 4 cannot be accepted ..."

24 Skipping over:

25 "Secondly, as we have never pleaded that

34

1 "Sixthly the reason given for not paying the
 2 full amount of the claim is spurious as we have
 3 demonstrated to them on a number of occasion
 4 that there is no basis for their allegation that
 5 the accounts were £3,509.18 short on week 49.

6 "Seventhly the position in respect of costs
 7 is not as clear cut as it appears at first
 8 because the courts have an ability to cap the
 9 amount of costs awarded so as to make them
 10 proportionate to the size of the claim. However
 11 they have to take a number of factors into
 12 consideration not merely the size of the claim
 13 the conduct of the parties, ours has been
 14 impeccable, the importance of the issues to the
 15 parties, proportionality of the costs incurred
 16 to the size of the claim has however been
 17 emphasised in a recent Court of Appeal decision.
 18 Therefore there is a risk that by rejecting
 19 an offer of our standard costs ..."

20 Then skip the blank page.

21 "... the court could decide to cap the costs
 22 at say £60,000 and then award only 60% of that.
 23 Costs to date including the progress and the
 24 work which the accountants have done together
 25 with counsel's fees come to approximately

36

1 £140,000.

2 "However the trial is still a little while
3 off and I think we should aim for Castleton
4 agreeing for judgment to be entered against him
5 in the full amount plus an agreement that he
6 will consent to the payment of a fixed sum in
7 respect of costs. As a trade off we can offer
8 the letter confirming there was no dishonesty
9 and agree that we will not seek interest at
10 an indemnity level. The benefit of having
11 a judgment against him in the full amount is
12 that we will be able to use this to demonstrate
13 to the network that despite his allegations
14 about Horizon we were able to recover the full
15 amount from him. It will be of tremendous use
16 in convincing other postmasters to think twice
17 about their allegations."

18 That last line, the last two lines of that
19 paragraph, "the benefit of having a judgment is
20 the Post Office will be able to use this to
21 demonstrate things to the Network and it will be
22 of tremendous use in convincing other
23 postmasters to think twice about their
24 allegations", does that reflect your
25 understanding of the Post Office's approach to

37

1 an insolvency practitioner instructed by
2 Castleton."

3 So this is post-judgment now, the judgment
4 has gone against Mr Castleton. We're in
5 February 2007:

6 "You can read his comments about yourself.

7 "Castleton has also agreed our total bill
8 for costs in writing which means we do not have
9 to go to court to have them taxed which incurs
10 additional legal costs in its own right. This
11 response also indicates that Castleton has no
12 intention of appealing against the decision of
13 the court and that the judgment is the final
14 comment on the matter.

15 "As such we will need to get on with making
16 as much use of the judgment as possible.
17 Stephen Dilley has asked for permission to
18 publish an article in a legal journal about the
19 case which I have no objection to as long as we
20 maintain editorial control as the more publicity
21 the case is given the greater should be its
22 effect upon postmasters who take legal advice
23 about defending claims for repayment."

24 That's a further reflection of the Post
25 Office's strategy here, isn't it?

39

1 Mr Castleton's case in general?

2 **A.** It doesn't reflect my recollection of it.

3 However, the language that's used in that,
4 I would agree, is similar to the language that's
5 used in the thing that you've shown me that's
6 four or five years later and is not pleasant.

7 **Q.** It's again suggesting that the result from
8 a sill case can be weaponised, isn't it?

9 **A.** Yes.

10 **Q.** "Postmasters take note, look what happens to you
11 if you deign to take us on". That was the
12 feeling, wasn't it?

13 **A.** I don't recall that being the feeling but,
14 clearly, that is the -- that's a fair
15 interpretation/description of sort of the tone
16 of those two lines that you've referred to,
17 yeah.

18 **Q.** Can we go to POL00113488. If we look at the
19 middle of page 1 -- thank you -- we can see
20 another email from Mandy Talbot to John Cole,
21 Mr Baines, to you --

22 **A.** Yes.

23 **Q.** -- and to others.

24 **A.** Yeah.

25 **Q.** "Stephen Dilley has been approached by

38

1 **A.** It does look like similar tone.

2 **Q.** "We've won, we need to hawk about the result
3 that we got as much as possible to discourage
4 other postmasters from even thinking about
5 taking us on"?

6 **A.** It's a similar tone to the other stuff, yeah.

7 **Q.** "... the more publicity the case is given, the
8 greater the effect on postmasters ..."

9 It's all of a piece, isn't it; and we see
10 exactly the same repeated after the Seema Misra
11 case, don't we?

12 **A.** Yes, the language that you picked out of those
13 is similar, yes.

14 **Q.** Can we move on, please. That can come down. We
15 can see from a series of documents that you
16 attended a series of regular calls with lawyers
17 from Bond Dickinson, if we can look at a couple
18 of examples, please. POL00043369.

19 So having gone backwards, I'm now going back
20 to where we were in the chronology, after the
21 Seema Misra case and we're now in 2013.

22 **A.** Right.

23 **Q.** This seems to be a record made by the Post
24 Office's solicitors, Bond Dickinson. It's
25 headed "Regular call re Horizon Issues", dated

40

1 2 October 2013.

2 **A.** Okay.

3 **Q.** You can see the attendees, Rodric Williams,

4 Jarnail Singh, both Post Office Legal, and then

5 Martin Smith of Cartwright King. Yes?

6 **A.** Yes. Yes.

7 **Q.** You now, in the Financial Services Centre, and

8 then, from Security, Dave Posnett and Rob King.

9 Then scroll down, please. Nobody from

10 Communication; some people from Network; and

11 some people from Information, Technology &

12 Change; and the Network Business Support Centre.

13 **A.** Yeah.

14 **Q.** Then over the page, please, "Previous issues

15 identified and further action to be taken", and

16 then there's a series of either Post Office

17 branches or issues identified in the left-hand

18 column and then narrative against each of them.

19 I'm not going to explore the content of any of

20 them. If you just scroll on, please.

21 And so it goes on --

22 **A.** Yeah.

23 **Q.** -- including civil cases and criminal cases and

24 issues outside of litigation.

25 **A.** Yeah.

41

1 Some of the things that were happening in

2 branches in respect of deployment of new

3 products and customer fraud, for example, a tax

4 of ATMs and ATM retracts, where people would get

5 £100 coming out and managed to do something with

6 the notes, not the top or bottom note but the

7 middle of them, there were a number of things

8 that were going on that were affecting the kind

9 of assurance about "Where is the cash", helping

10 to clarify with the subpostmasters things like

11 ATM retract trays within the ATMs, where

12 somebody might think the money was missing but

13 it was actually in a tray underneath the machine

14 because it had been retracted back into it.

15 So I think there was quite an overlap

16 between things that my team were doing around

17 back office efficiency programme which was

18 actually really front office product, linked to

19 back end, and that would make it easier to it

20 get the transaction going through in the first

21 place. Those things sort of inherently

22 overlapped with people perhaps complaining about

23 how easy it was to transact a product, and

24 things, challenges about how easy it was to

25 transact a product might lead to calls to the

43

1 **Q.** Just to take another example, please. Can we

2 look at POL00043371. In October 2013, again

3 an attendance note by Bond Dickinson. You can

4 see the attendees and it's not dissimilar to

5 before.

6 **A.** Yeah.

7 **Q.** Then scrolling down -- thank you -- you attended

8 these series of meetings with individuals from

9 a variety of teams within the Post Office,

10 including Post Office Legal, to discuss ongoing

11 issues with Horizon; is that right?

12 **A.** Yes. Yeah.

13 **Q.** When were these meetings established?

14 **A.** I don't know when the start date of them was.

15 **Q.** What was the genesis of them?

16 **A.** It was probably everything that we've been

17 talking about. So I think around about that

18 time, within Product and Branch Accounting,

19 I think there would have been a back office

20 efficiency programme, which has been referred

21 to, and a project Ping was something in my

22 earlier call bundle. There were a number of

23 things that we were doing which we were trying

24 to do to make accounting of transactions in

25 branches simpler and more one-touch stuff.

42

1 NBSC. And sometimes those may rightly or

2 inadvertently become sounding like they were

3 questions about Horizon, when they may or may

4 not have been.

5 And some of the other things in the bundles

6 have referred to subpostmasters may, for

7 example, speak directly to Wincor Nixdorf, who

8 oversaw the ATMs, and you'd get a bit of

9 a message from one to another that doesn't

10 quite -- that sort of evolves over time and then

11 turns into something that says, "Here's

12 a Horizon issue", when actually it was branch

13 issue to do with another piece of kit.

14 So I think -- I don't know when this meeting

15 started but I think there was certainly

16 an overlap between understanding how to make it

17 easier to do some of the products, understanding

18 how the commercial product pillars were

19 deploying new things through our network and

20 issues that were being logged that would have

21 directly, perhaps, fallen under the description

22 of "Horizon issues" in here.

23 So you're right, the topic list we've seen

24 in that table covered some things that weren't

25 perhaps a matter of the essence of the kind of

44

1 challenges that this Inquiry is directly looking
2 at but there was sort of quite an overlap of
3 these different things coming together, and so
4 this group -- it feels right there was a group
5 that was convened, but I don't know when it
6 started, but that's -- well, I hope in some way
7 that helps as my description of -- that's how my
8 genesis of being involved in it comes about,
9 I think.

10 **Q.** Were there Terms of Reference for this group?

11 **A.** I don't know. I would expect there were.
12 I don't know.

13 **Q.** Was it a decision-making body?

14 **A.** Was it -- I don't think it was a decision-making
15 body. I think it was one that was going to make
16 sure that, with the different teams that were
17 involved, that we were able to have
18 a coordinated clarification of an issue. So,
19 for example, I've said about Wincor Nixdorf and
20 ATMs and retract trays within ATMs, there were
21 a lot of situations where a call and
22 a description of an issue may go directly to
23 NBSC. Equally, sometimes branches had got
24 direct telephone numbers into my team, so rather
25 than ticketing it through the NBSC they may have

45

1 sometimes there was some confusion about is
2 a colleague in the network making an allegation
3 about the Horizon System or is a colleague in
4 the network raising a point about something else
5 that needs some sort of improvement around it,
6 but may be nothing to do with the nature of the
7 concerns that have led to this Inquiry?

8 **Q.** To whom did this group report?

9 **A.** I don't know. I'm not sure if it did report to
10 somebody. I think often you might have a group
11 of people who meet to ensure that something is
12 done. There are lots of groups who may gather
13 who don't report to somebody, because it's --
14 you've got together to fix something, and you've
15 worked out what needs doing, and you get on with
16 fixing it. This obviously is a group that's
17 touching on the Horizon matters, so I would have
18 expected that there'd be visibility of this
19 going into the legal director but I don't know.

20 **Q.** Just going back to page 1, please. You'll see
21 there's lots of lawyers involved.

22 **A.** Yes, yes.

23 **Q.** Why was that?

24 **A.** Well, I think because a lot of -- the point that
25 I'd made about the number of issues being

47

1 called somebody who they spoke to about
2 a transaction correction the year before, and
3 called them on the off-chance they could guide
4 them to somebody.

5 Sometimes people wrote letters in to
6 different people in the organisation. Sometimes
7 things were raised through Network Relationship
8 Managers and so, where we were trying to ensure,
9 for example, that we dealt with the ATM retract
10 issue, we needed to make sure that we'd got some
11 forum where all the different people who might
12 have some knowledge of complaints being made and
13 process improvements being identified, that they
14 were coming together.

15 So this group wasn't making a decision about
16 something but I think it was a forum where we
17 could make sure that we've got a consistent
18 understanding of some of these topics. Possibly
19 it should have been several different groups
20 doing different things rather than having it all
21 coming together but I think at the time, because
22 it was clear there were sometimes a blurring
23 of -- for understandable reasons of somebody
24 speaks to somebody, who then speaks to somebody
25 else, who passes something on to somebody else,

46

1 experienced with products in branches, a lot of
2 those things were being raised in cases. So
3 I think -- it's a long list and I don't know why
4 it needed five lawyers to be coming to the
5 meeting.

6 **Q.** Who established this group of people?

7 **A.** I don't know. I don't know. They're -- from
8 a back office efficiency programme point of
9 view, which was a programme I was responsible
10 for, I sometimes asked for groups to be convened
11 together such that we could have a common
12 understanding across Network, Commercial,
13 Marketing teams who'd got the relationship with
14 a corporate client, for example. So I would
15 sometimes convene groups.

16 I don't know whether I convened this one.
17 I imagine that if I would have asked something
18 from a back office efficiency point of view, if
19 Bond Dickinson are -- their letterhead's on
20 this, so I think this would have been initiated
21 by somebody in Legal.

22 **MR BEER:** Thank you.

23 Sir, I'm about to move to a new set of
24 topics, I wonder whether we could take the
25 morning break. We're going to comfortably

48

1 finish today and I would have thought before
 2 lunch.
 3 **SIR WYN WILLIAMS:** All right, that's fine. So what
 4 time shall we start again?
 5 **MR BEER:** 11.20, please.
 6 **SIR WYN WILLIAMS:** Fine.
 7 **MR BEER:** Thank you.
 8 (11.06 am)
 9 (A short break)
 10 (11.20 am)
 11 **MR BEER:** Sir, can you see and hear me?
 12 **SIR WYN WILLIAMS:** Yes, I can, thank you very much.
 13 **MR BEER:** Thank you very much.
 14 I'm just going to move to the last topic
 15 that I'm going to ask you questions about on
 16 this occasion, Mr Ismay.
 17 **A.** Okay.
 18 **Q.** It's about what you subsequently wrote about the
 19 payments and receipts mismatch bug.
 20 **A.** Right.
 21 **Q.** We're turning to a phase in February/March 2011,
 22 so about six months after writing the Horizon
 23 report. The documents suggest that you were
 24 involved in communications between Fujitsu and
 25 the Post Office relating to the receipts and
 49

1 that is bubbling away, and is likely to escalate
 2 quite quickly.
 3 "Salawu and Tony Jamasb on our side have
 4 been dealing with the Receipts and Payments
 5 issue that happened in September 2010."
 6 I'm not going to investigate with you
 7 whether or not that's correct, that the issue
 8 only happened in 2010 or whether it was evident
 9 in May or February 2010. We can leave that to
 10 one side:
 11 "The Receipts and Payments issue that
 12 happened in September 2010. There was a small
 13 team dealing with this and had got to the point
 14 of resolution. However, given the current noise
 15 in the press over the Horizon, Rod Ismay has
 16 picked up this issue and is concerned that there
 17 are still some unanswered questions around what
 18 happened in branches. Can I ask you to get
 19 involved please as I need to brief Mike on the
 20 implications of this issue so we can check it
 21 against statements we have previously made. One
 22 of Rod's concerns was that this issue could be
 23 detrimental in how we approach future comms and
 24 cases pending."
 25 Firstly, was it right that by February 2011,
 51

1 payments mismatch bug.
 2 **A.** Right.
 3 **Q.** You remember that, do you?
 4 **A.** Yes.
 5 **Q.** Okay. Can we look, please, to start with at
 6 FUJ00081544.
 7 Sorry, 1545. My mistake. Thank you. Can
 8 we look at the second page, please. It's the
 9 email in the middle of the page, between Will
 10 Russell, who is described as a Commercial
 11 Advisor in Service Delivery -- was he somebody
 12 who worked for you at this stage?
 13 **A.** No, I think Service Delivery was a part of the
 14 IT and operations functions of the organisation.
 15 So, no, he didn't report to me. No. I think he
 16 reported to Andy McLean, actually, who --
 17 **Q.** Right. In any event, he says, "James", that's
 18 James Davidson, to whom he is writing. Is that
 19 somebody who reported to you or was within your
 20 team?
 21 **A.** No, James Davidson, I think, was a Fujitsu
 22 person.
 23 **Q.** He says:
 24 "Dave Hulbert is off as you're no doubt
 25 aware. I need to make you [aware] of an issue
 50

1 you had concerns about how the receipts and
 2 payments mismatch bug could affect pending
 3 cases?
 4 **A.** I think probably, yes.
 5 **Q.** In what way were you concerned that the bug
 6 could affect cases pending?
 7 **A.** I can't remember exactly at the time but I think
 8 I would have been thinking I've -- I'd just
 9 collated a report that specified five topics,
 10 I think, in it, back in August 2010 and this
 11 looks like a sixth topic.
 12 **Q.** This wasn't one of them?
 13 **A.** This went one of them, yeah. So I think I would
 14 have been concerned that there's another topic
 15 arisen, and I think I would have been concerned,
 16 consistent with that report back in September,
 17 that if something now has arisen that's got
 18 an impact on cases, well, what does that mean?
 19 And I think that would be a matter for the
 20 legal team to have decided what does that mean
 21 in respect of ongoing cases, but this thing has
 22 some of the other -- the document that came up
 23 inadvertently, but you might move on to, it
 24 looks -- and as I've looked at the evidence it's
 25 helping remember what would have been going on
 52

1 at the time, but I -- looks like I tried to go
2 through a scenario of, with these things
3 happening, this is what I would have expected
4 the accounts in a branch to show. However, what
5 the accounts in the branch actually showed was
6 this.

7 And I think I got into correspondence with
8 Gareth to say "Well, what has happened here?
9 How is one to the other?" So I think I would
10 have been concerned because I've got a role in
11 accounting and there is something here that
12 didn't make sense.

13 And I think, clearly in this -- the report
14 I collated refers to things like double entry
15 bookkeeping. Some aspects of the matters that
16 have come out of this have raised a question
17 about that kind of core concept and I think
18 there was an element of this in here, "Well, how
19 is that bookkeeping working through this
20 process?" And, therefore, I think there was
21 hardly anybody else in the organisation who
22 could talk double entry bookkeeping in that way,
23 so I was trying to marshall that conversation
24 with Gareth.

25 **Q.** I think the email that you're referring to is

53

1 thought process I've got here and, evidently,
2 I'd got into some really detailed set-up of
3 here's number of things, a starting point,
4 here's a transaction that gets us to there, this
5 is what it should have been, this what it
6 actually was, how's the bookkeeping working
7 through there?

8 I hadn't managed, amongst all those
9 3,500 pages to get my head back into the space
10 exactly on this one, so I don't know what I made
11 of Gareth's reply that came back, honestly can't
12 remember whether I was assured or not, out of
13 it. But I think the general sense of my -- when
14 I did have conversation with Gareth about stuff
15 and with other colleagues at Fujitsu, I --
16 perhaps wrongly, but I felt I was having
17 a conversation where I felt the individuals, and
18 Gareth included, knew what they were talking
19 about and presented a cogent analysis that made
20 sense to me, which was part of a reason for me
21 feeling assured about what he was saying.

22 So I don't know what my summary
23 interpretation was of this specific thing but
24 maybe we'll come to something that does indicate
25 what my thoughts were. I'm not sure what other

55

1 FUJ00081544.

2 **A.** It was --

3 **Q.** It came up earlier.

4 **A.** Yes, yes.

5 **Q.** At the foot of the page, we see a series of
6 questions that you address to Gareth Jenkins and
7 others --

8 **A.** Right. Yeah.

9 **Q.** -- but principally addressed to Gareth Jenkins,
10 and the questions continue on this page. It
11 doesn't show up well in the non-colour version,
12 but he provides his answers underneath each
13 question.

14 **A.** Right, right.

15 **Q.** Overall, what did you take from his replies?

16 **A.** I can't remember what I took from it.

17 **Q.** Did it cause you to revisit anything that you
18 had written in your report?

19 **A.** I don't think it did. I mean, I don't think
20 I reissued the report that I'd done. I didn't.
21 The report stood. So I have tried to get my
22 head back into the space where I was to
23 understand this. I've got that 3,500 pages of
24 documents I've been working through to try to --
25 and I have tried to put my head back into the

54

1 documents follow on from this.

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

3 As a general question to end my questions,
4 is there any reflection that you have got that
5 would like to give on your role, particularly in
6 2010, concerning this episode.

7 **A.** Well, I think in respect of -- in 2010, in
8 respect of the report that I've collated, and
9 I've put in my witness statement reflections
10 that I've got on that, I think it could have
11 been done differently, different tone of voice,
12 could have had a terms of reference agreed about
13 it. And I've indicated this morning that
14 there's this question of this was a report being
15 collated about reasons about -- the reasons to
16 be assured about an IT system, so why was it me
17 that was being asked to collate the thing?

18 So I think there was a number of things that
19 I'd perhaps stepped back and say, well, in
20 hindsight, I would have perhaps challenged who
21 was the owner of this system within the
22 organisation, and where are they coming to the
23 table to articulate and collate this thing?

24 **MR BEER:** Thank you very much, they're the only
25 questions I ask for now.

56

1 **THE WITNESS:** Thank you.
 2 **MR BEER:** I think Mr Stein is first, sir.
 3 **SIR WYN WILLIAMS:** Yeah.
 4 **Questioned by MR STEIN**
 5 **MR STEIN:** Mr Ismay, my name is Sam Stein
 6 I represent a large number of subpostmasters and
 7 mistresses and I'm instructed by a firm of
 8 solicitors called Howe+Co.
 9 **A.** Okay.
 10 **Q.** Mr Ismay, I'm just going to remind you of the
 11 dates or the date in particular of your system
 12 integrity report. That was obviously in 2010,
 13 in the very early part of August 2010; do you
 14 remember that?
 15 **A.** Yes, yes.
 16 **Q.** You'll also recall, no doubt, the questions that
 17 have been asked by Mr Beer, King's Counsel,
 18 yesterday, regarding your system integrity
 19 report.
 20 **A.** I know he asked a lot of questions.
 21 **Q.** He did. The overall result of your report was,
 22 it seems, to give the Horizon System a clean
 23 bill of health. You thought it worked okay; is
 24 that fair?
 25 **A.** Yeah, I thought there was a long list of reasons

57

1 **Q.** Let's go through the attendees, Antonio Jamasb,
 2 AJ in brackets. Somebody you know --
 3 **A.** Yes.
 4 **Q.** -- within POL?
 5 **A.** Yes, I think in Service Delivery, that was part
 6 of Post Office IT, I think. Yeah.
 7 **Q.** Emma Langfield?
 8 **A.** I remember the name. Yeah.
 9 **Q.** Again within POL IT?
 10 **A.** Yeah, I think so, yeah.
 11 **Q.** We can see there referred to as Service
 12 Delivery.
 13 Alan Simpson, Security?
 14 **A.** Yeah, I think Information Security.
 15 **Q.** Information Security?
 16 **A.** Yeah, I think so.
 17 **Q.** Right, quite senior?
 18 **A.** I think he was a manager in the team, I don't
 19 know what level his role was.
 20 **Q.** Julia Marwood?
 21 **A.** Yeah, I remember Julia in the Network.
 22 **Q.** Again POL?
 23 **A.** Yeah, POL, yes.
 24 **Q.** Then Ian Trundell, rather helpfully described
 25 there as IT. "IT" presumably his initials and

59

1 to be assured, including avenues where
 2 colleagues in branches could escalate issues if
 3 they'd got them, rather than it coming to light
 4 in a response to a case.
 5 **Q.** So, in other words, Mr Ismay you're saying in
 6 that report that what you're putting forward
 7 there is that the system seems to be okay?
 8 **A.** Yes.
 9 **Q.** Yes. Now, you've just been asked some questions
 10 about the receipts and payments mismatch issue,
 11 okay? I'm going to take you to a document,
 12 POL00028838. Thank you.
 13 Now, this document, as you can see at the
 14 top, if we just look at the top of the screen,
 15 you can see left-hand side "Post Office"?
 16 **A.** Yeah.
 17 **Q.** Right-hand side, "Fujitsu"?
 18 **A.** Yes.
 19 **Q.** Right smack in the middle there is
 20 "Receipts/Payments Mismatch issue notes", okay?
 21 **A.** Yeah.
 22 **Q.** All right, let's have a look at the attendees
 23 because it's clearly referring to a meeting, all
 24 right?
 25 **A.** Yeah.

58

1 also IT expertise; is that fair?
 2 **A.** Yeah.
 3 **Q.** Andrew Winn, of course, you know, POL Finance.
 4 **A.** My team, yes, yeah.
 5 **Q.** Mike Stewart, Fujitsu SDM.
 6 John Simpkins, Fujitsu Security.
 7 Gareth Jenkins, Fujitsu Technical.
 8 Mark Wright, Fujitsu Technical, okay?
 9 So we can see this particular document has
 10 got a real joined together sense. We've got
 11 both Post Office, Fujitsu looking at the
 12 receipts/payments mismatch issue; do you agree?
 13 **A.** Yeah.
 14 **Q.** Okay. Now, you've explained to Mr Beer, King's
 15 Counsel that you were aware of this particular
 16 issue, at least as we were looking at the
 17 documents, by the time you reached the early
 18 part of the following year 2011?
 19 **A.** Yeah.
 20 **Q.** Right. Now help us, please, with when do you
 21 remember first being made aware of this issue?
 22 Was it in 2010 or was it later?
 23 **A.** I'm not sure when I became aware of it. There's
 24 a lot of stuff in here that's prompted my memory
 25 to recall things --

60

1 Q. Of course.

2 A. -- and it looks like I was on holiday in
3 February and came back to get involved in
4 something. I think the bit of correspondence we
5 saw that was dated 18 February, maybe was before
6 the half term. So maybe I saw something earlier
7 in February. But, to the best of my knowledge,
8 it would have been February. I can't remember.

9 Q. Okay. Let's have a little bit of thinking about
10 the system integrity report.

11 A. Yeah.

12 Q. That report, was that circulated amongst POL
13 senior team membership, amongst managers? How
14 far did that circulation reach?

15 A. So I shared it with the senior managers within
16 my team, in the collation of that report, and
17 that is a thing that probably in hindsight they
18 should have been added to the circulation list
19 for clarity. So that report, I shared it with
20 the group who were named on that report.
21 I shared it with the five or six people who
22 directly reported to me because, in the
23 compilation of talking to people, then some of
24 my own team were some people who I spoke to to
25 gather some of the information that went into

61

1 read through what, in fact, what you have on the
2 screen. We've got right at the bottom
3 "c:\documents and settings\Jarnail.a.singh",
4 then a variety of other things. Underneath that
5 you've got then "Printed at 16:38:24 on
6 8/10/2010", okay?

7 A. Yeah.

8 Q. So with that, and if we go back to some action
9 point summaries, we can see some dates that help
10 us a bit more in relation to when things are
11 happening, so if we go back a page, so that's
12 page 5 of 5 -- there we are. We can see,
13 Mr Ismay, that we've got a little bit more help
14 here on dates, despite the fact that the
15 document itself isn't dated, we can see we're
16 talking about dates that relate to 6 to
17 8 October and then the other date we looked at
18 for the back document --

19 A. Yes.

20 Q. -- is the 10th.

21 A. Yes.

22 Q. Okay. All right. So we can see we're talking
23 about, I suppose, the first week or so of
24 October.

25 A. Yeah.

63

1 that.

2 To the best of my knowledge, that's the
3 audience that I shared that report with.

4 Q. So it had reasonably good distribution amongst
5 POL?

6 A. Well, it had the -- well, 15 people on that one
7 and then five or six people who reported to me.

8 Q. Yeah, okay. Now, let's stay with dates for the
9 moment and, in relation to the document we have
10 on the screen, the pages that we have, 1 to 5,
11 are not dated. But if we go to the sixth page
12 within the bundle, we can see that's titled, top
13 right-hand corner "Appendix 2 to CS's responsive
14 note", so it would be the sixth page on
15 relatively, "Correcting accounts for lost
16 discrepancies", and then right at the bottom of
17 the page and, if it's possible to expand that
18 and highlight at the bottom, we'll see then some
19 help on dates.

20 Very grateful.

21 Now, is it possible to get rid of that
22 little inset box that's currently on the screen
23 that says, "Desktop UMW", et cetera? It's only
24 on my screen. Right. Right, apparently it's
25 only on my screen, so that's helpful. Let's

62

1 Q. All right -- 2010.

2 Now, back to page 1, so that's page 1 of
3 POL00028838, please. That document sets out
4 there, under the heading "What is the issue" and
5 if we just go through that, it explains slightly
6 better over the page, so we'll just look at that
7 in a moment:

8 "What is the issue?"

9 "Discrepancies showing at the Horizon
10 counter disappear when the branch follows
11 certain process steps, but will still show
12 within the back end branch account. This
13 currently impacting circa 40 branches since
14 migration on to Horizon Online, with an overall
15 cash value of circa £20K loss.

16 "This issue will only occur if a branch
17 cancels completion of the training period but
18 within the same session continues to roll into
19 a new balance period."

20 Okay?

21 A. Yeah.

22 Q. All right. Now, this then is explained a little
23 bit better if we go over the page, all right?
24 Let's go to page 2 of 5, using the internal
25 document pagination. We should have at the top

64

1 of your page there, it says -- does it start
 2 with "Note at this point nothing into feeds
 3 POLSAP". You have that?
 4 **A.** Yes.
 5 **Q.** Right. Let's read through that:
 6 "Note at this point nothing into feeds
 7 POLSAP and Credence, so in effect the POLSAP and
 8 Credence shows discrepancy whereas the Horizon
 9 in the branch doesn't. So the branch will then
 10 believe they have balanced."
 11 Okay? Middle of that page, under the second
 12 note it says:
 13 "Note the branch will not get a prompt from
 14 the system to say there is a Receipts and
 15 Payments mismatch, therefore the branch will
 16 believe they have balanced correctly."
 17 All right?
 18 **A.** Yeah.
 19 **Q.** Lastly, just on what happens, what's the
 20 consequence of the issue, "Impact", further down
 21 that page, first bullet point:
 22 "The branch has appeared to have balanced,
 23 whereas in fact they could have a loss or
 24 a gain."
 25 Okay?

65

1 this particular mismatch bug issue, that, in
 2 fact, this was not a system that operated
 3 properly at all times?
 4 **A.** So I don't know why I didn't redo that report.
 5 The report had just been asked for as a one-off
 6 at the time and I provided that. You'll have
 7 seen some of the audience in those emails there
 8 were -- one of them was a direct addressee of
 9 the original report. And so, clearly, some of
 10 that audience were also aware of this thing
 11 because they'd been corresponding about it while
 12 I was on holiday.
 13 But I'd got lots of things that I was
 14 involved in and the concept with all the things
 15 that I was involved in, gearing up to Royal Mail
 16 privatisation, the thought in this -- and
 17 I appreciate this is unsatisfactory in the
 18 nature and gravitas of the whole of events that
 19 have gone on, but thinking of rewriting and
 20 reissuing the report that I'd done the previous
 21 year I don't think crossed my mind at the time
 22 because I was incredibly busy with many other
 23 things.
 24 Now, clearly, that is -- in the context of
 25 what's happened, it does beg a question of

67

1 **A.** Yes.
 2 **Q.** Right. This appears to represent a problem to
 3 double entry bookkeeping; do you agree?
 4 **A.** Yes.
 5 **Q.** Right. The point being, your background
 6 training as an accountant is that, essentially,
 7 what you should be able to find within the
 8 branch should match the rest of the system?
 9 **A.** Yes.
 10 **Q.** Do you agree?
 11 **A.** Yes.
 12 **Q.** Right. Now, this doesn't appear to say that the
 13 system's working properly or indeed is fine and
 14 dandy, does it, Mr Ismay?
 15 **A.** No, it doesn't.
 16 **Q.** No. Now, you were asked a number of questions
 17 by Mr Beer, King's Counsel about this particular
 18 issue. Did you have the understanding of this
 19 particular issue, that you and I have just
 20 looked at over the last few minutes, at the
 21 early part of 2011?
 22 **A.** I must have because I've dated something
 23 18 February. So I certainly did then.
 24 **Q.** Why, Mr Ismay, did you not amend your report
 25 from August 2010 when you knew, at least from

66

1 "Well, should I have redone that report?" And
 2 in hindsight, I probably should have but
 3 I didn't.
 4 **Q.** Mr Ismay, your background, as you describe in
 5 the statement you give, is that you joined the
 6 Post Office in September 2003 as Head of Risk
 7 and Control in the Finance Directorate?
 8 **A.** Yes.
 9 **Q.** You previously worked for a company that's well
 10 known, called Ernst & Young. You consider
 11 yourself to be a finance professional with
 12 a background in audit accounting and positive
 13 experience of board reporting, staff engagement,
 14 and process improvement. How would you rate
 15 your own performance in relation to not amending
 16 that report, Mr Ismay?
 17 **A.** I think on this one, that's a failure.
 18 **Q.** Thank you.
 19 **A.** I think there are many other things that I did
 20 that were not and I got a lot of feedback that
 21 there were a lot of positive reports and
 22 a positive process leadership that I did but, on
 23 this specific one, it's clear that that was
 24 unsatisfactory.
 25 **Q.** So the upshot was that you left a report that

68

1 gave the system a clean bill of health,
 2 essentially un-updated within the POL system, as
 3 being a general report that said that
 4 everything's fine and dandy with the Horizon
 5 System. You just left it unaltered. That's
 6 what you did, isn't it, Mr Ismay?

7 **A.** I, as I've explained earlier, was asked to
 8 collate a report which begs a question to me of
 9 why wasn't somebody in IT who owns this system
 10 asked to collate that report in the first place?

11 Members of IT were talking about that thing
 12 while I was on holiday in February. Members of
 13 IT should have been responding to the issue of
 14 what was -- how did this add to it. Yes, as
 15 a professional, I had issued a report, and that
 16 begs a question of should I have reissued that?
 17 Well, I'm not sure it should have been me
 18 writing the report in the first place and, as
 19 I've put in the end of my witness statement,
 20 I've suggested that there should be clearer
 21 ownership of systems in order that the relevant
 22 individuals can escalate people -- things to the
 23 right place and ensure there is resolution by
 24 the owner of the appropriate system, which was
 25 not me.

1 Do you agree that those are the same types
 2 of sentiments as you've examined with Mr Beer,
 3 King's Counsel.

4 **A.** I agree that those sound like the same types of
 5 sentiments, yes.

6 **MR STEIN:** Just give me one moment, Mr Ismay.

7 Nothing further, Mr Ismay. Thank you.

8 **THE WITNESS:** Thank you.

9 **SIR WYN WILLIAMS:** Mr Ismay, while it's on my mind,
 10 on a number of occasions now, you have used
 11 a phrase like "it begs the question" in respect
 12 of why it was you that was chosen to write the
 13 report in August 2010. I just want to be clear
 14 what the implication of that is. Are you
 15 suggesting that Mr Smith had an ulterior motive
 16 in inviting you to make that report?

17 **A.** No, I'm not suggesting he had an ulterior motive
 18 but I'm wondering why as -- somebody in IT who
 19 owned the system wasn't asked to, because they
 20 would have been more readily able to immediately
 21 come up with some more sections of that report.

22 **SIR WYN WILLIAMS:** Well, that might be a fair point,
 23 which is why I asked you the question whether
 24 you could, if you can, offer any kind of
 25 explanation as to why it was you that was

1 **Q.** Did you check whether, as you've just said, the
 2 members of IT were adequately responding to this
 3 particular issue, so that you could then take
 4 that into account in relation to your report?

5 Did you check whether anything was being done?

6 **A.** I would have asked for -- get on and sort this.

7 **Q.** Can I ask you to go back to the document, which
 8 is POL00028838 page 2 of 5. It's on screen, I'm
 9 very grateful. Under "Impact". Look at the
 10 bottom part. We've looked at the first bullet
 11 point. It says this that, in relation to this
 12 issue, second bullet point, this is:

13 "Our accounting systems will be out of sync
 14 with what is recorded at the branch."

15 Third bullet point:

16 "If widely known could cause a loss of
 17 confidence in the Horizon System by branches.

18 Fourth bullet point:

19 "Potential impact upon ongoing legal cases
 20 where branches are disputing the integrity of
 21 Horizon data."

22 The fifth and last of those five bullet
 23 points:

24 "It could provide branches ammunition to
 25 blame Horizon for future discrepancies."

1 chosen.

2 **A.** Well, I think that I was chosen because Dave was
 3 relatively new in the organisation. I think he
 4 was only in Post Office for a year. I don't
 5 know when he joined, but he would have
 6 probably -- with the diversity of the
 7 organisation -- would still have been learning
 8 about a number of things.

9 I know that he came to Chesterfield and
 10 I and my team would have explained to him the
 11 nature of the functions that we did in
 12 Chesterfield, which had a large contact with
 13 subpostmasters and Post Office branches. So
 14 I think that Dave would have interpreted out of
 15 that that I had got an understanding that
 16 possibly felt more, from the conversations he
 17 was having, than with other teams that he'd had
 18 an induction with.

19 So I -- and -- and that's why I think he
 20 asked me.

21 **SIR WYN WILLIAMS:** All right. Thank you.

22 Yes, who is next, please?

23 **Questioned by MS PAGE**

24 **MS PAGE:** Flora Page, sir.

25 On behalf of a number of the other

1 subpostmasters, Mr Ismay.
 2 Did you speak to any other potential
 3 witnesses before giving your evidence to the
 4 Inquiry about your evidence?
 5 **A.** No. So I've not spoken to any other witnesses
 6 in the course of any things that I have had to
 7 do with the Inquiry, no.
 8 **Q.** Mr Beer, King's Counsel took you to an email
 9 yesterday that Lynn Hobbs apparently sent to
 10 you, in which she told you that Fujitsu could
 11 insert transactions into branch accounts; do you
 12 remember that email?
 13 **A.** I do remember that document, yes. I remember it
 14 from the pack yesterday, yeah.
 15 **Q.** Well, that was what I was going to say. You
 16 received that, of course, prior to coming
 17 yesterday, didn't you?
 18 **A.** Yes, so that would have been in one of the
 19 bundles that I received, yes.
 20 **Q.** So you will have seen when you read it that it
 21 was also sent to Angela van den Bogerd, although
 22 not at the same time as it was sent to you; it
 23 was sent to her subsequently. Did you notice
 24 that?
 25 **A.** Well, I can't remember whose names were on the
 73

1 Fujitsu either. So I've not spoken to other
 2 people and I've been as keen as possible, in the
 3 nicest way, to avoid reading things in the press
 4 and on social media, as much as possible, in
 5 order to come here with as uncontaminated
 6 a recollection as I can to have this
 7 conversation.
 8 And I certainly have not, and I would say
 9 going back a few years, I have been contacted by
 10 Post Office Limited with a question of could
 11 I help to collate an understanding of what
 12 happened many years ago. So with one firm of
 13 solicitors acting for the Post Office I was
 14 approached a few years ago, after leaving the
 15 Post Office, to provide something. Angela,
 16 I think, texted me to say would I mind speaking
 17 to the solicitors, but that's the only contact
 18 I've had.
 19 **Q.** All right. So we're to understand that you
 20 simply haven't asked her about what she may
 21 remember or whether she spoke to you at the time
 22 about it?
 23 **A.** No. And I think my perception for this Inquiry
 24 is that it's more appropriate that I come into
 25 the room uncontaminated by what other people's
 75

1 thing but if that's -- I'm not disagreeing with
 2 you if that's -- yeah.
 3 **Q.** All right. Well, bear with me. It was sent to
 4 her at the same time as your report was sent to
 5 her, your report to the Managing Director David
 6 Smith, in which you said that there were no
 7 backdoors into the Horizon System and that
 8 branch accounts could not be changed in any way
 9 by anyone other than those in the branch?
 10 **A.** Right.
 11 **Q.** Yes?
 12 **A.** Yeah.
 13 **Q.** So she received the two contradictory documents
 14 at the same time: on the one hand, an email from
 15 Lynn Hobbs saying that Fujitsu could insert
 16 transactions; and, on the other hand, your
 17 report saying that they could not.
 18 **A.** Right. Okay.
 19 **Q.** So when you read that in advance of these
 20 hearings, did you think of speaking to Ms van
 21 den Bogerd about the Hobbs email --
 22 **A.** No.
 23 **Q.** -- to see what she remembered of it?
 24 **A.** No. I've consciously not spoken to anybody back
 25 at the Post Office and I don't know anybody at
 74

1 thoughts are. The Inquiry has presented me with
 2 things, they tried to jog my memory of what
 3 happened all those years ago, and I have not,
 4 and I feel it would have probably been
 5 inappropriate to be having a discussion with
 6 other potential witnesses. So no. So
 7 I haven't, no.
 8 **Q.** The same, then, must be true also of Mike
 9 Granville who received that email at the same
 10 time as you?
 11 **A.** That's correct. So I probably haven't --
 12 I haven't spoken to Mike Granville since I left
 13 the Post Office. No.
 14 **Q.** It's interesting to note that we don't have that
 15 email from Lynn Hobbs to you and Mike Granville
 16 in the form that it was originally sent. You
 17 saw that, didn't you? It was in the format of
 18 apparently that email having been cut and paste
 19 into another email from Ms Hobbs to John
 20 Breeden. Did you notice that?
 21 **A.** Yes, I did notice that, yeah.
 22 **Q.** So what we don't have is the email as it would
 23 have appeared in yours and Mike Granville's
 24 inbox?
 25 **A.** Yeah, or did it even go into my inbox. So
 76

1 I don't know what emails I received by then.
 2 Probably like you, I do find it slightly odd,
 3 but I would also expect the -- I don't know the
 4 process by which the Inquiry has been able to
 5 obtain all the different documents that are fed
 6 into these bundles. It sort of feels like you
 7 must have had access to email accounts or
 8 something to collate this.

9 So I am somewhat puzzled for what appears to
 10 be an important document, why it is a cut and
 11 paste. That seems -- that's slightly odd.

12 **Q.** Yes, because we all know, don't we, that emails
 13 would also not only be in your inbox but
 14 presumably your outbox, her sent items, yes?

15 **A.** Yes, yeah.

16 **Q.** And presumably also in Mike Granville's inbox,
 17 yes?

18 **A.** Yeah, yeah.

19 **Q.** So we don't have it from any of those sources,
 20 although it must have been available to Ms Hobbs
 21 when she cut and pasted it in the month that she
 22 cut and pasted it, yes? So she must have had it
 23 in her sent items at that point, mustn't she?

24 **A.** Well, yeah, presumably it was either an email
 25 that was in sent items, which is most likely the

77

1 be really awful for the individuals concerned
 2 and difficult to share that. That goes back to
 3 the concept, again, of me wanting to be able to
 4 attend this Inquiry with as uncontaminated
 5 a history in my own head of what do I remember,
 6 because the nature of the Inquiry is I am sat
 7 here having seen some things in the press, I've
 8 had people on Twitter saying things about me,
 9 which you hear so many things, and eventually
 10 you think "Well, can I remember that?" Or "I've
 11 heard this so many times, did I hear that or
 12 not?"

13 And therefore I've tried to take the
 14 approach, and I don't want that to sound
 15 insensitive, but I've tried to take the approach
 16 as much as possible of not listening to the
 17 commentary, including those -- Phase 1 of this
 18 Inquiry, and that's really because I received
 19 a letter that said I was going to be invited to
 20 the Inquiry. I thought "Right, I want to be
 21 able to come here and give my own memory of it",
 22 and that's not in any disrespect to the
 23 individuals who will have found it hard to share
 24 that. I didn't want to come here with
 25 a possibility of what they said contaminating my

79

1 case, or one could type it and paste what you
 2 want.

3 **Q.** So do you know anything about why the original
 4 email is apparently no longer in existence?

5 **A.** No.

6 **Q.** Were you ever aware of your colleague's in
 7 Security destroying documents?

8 **A.** No. I have read in the press subsequently, like
 9 in the last couple of years, comments about
 10 individuals and shredding but I wasn't aware at
 11 the time that I was at the Post Office of --

12 **Q.** Not when you were in charge of those in
 13 investigations either?

14 **A.** No.

15 **Q.** So there was a period, wasn't there, when
 16 Mr Utting was reporting to you and you were, in
 17 effect, the possible of investigations, yes?

18 **A.** Yes, so probably in 2005, yeah.

19 **Q.** You've told us that you haven't listened to the
 20 Human Impact evidence. You'll forgive me if
 21 I put some to you because it relates to the
 22 conduct of the investigators?

23 **A.** Yeah, could I just clarify the reason that
 24 I haven't listened to the Human Impact -- and
 25 it's awful, I know that the content of that will

78

1 recollection of what I'm sharing with you.

2 **Q.** Why did Andrew Winn's testimony fall into
 3 a different category to the Human Impact
 4 testimony, in that case?

5 **A.** Because Andy Winn worked for me and there
 6 were -- specifically that felt appropriate to
 7 look at.

8 **Q.** All the more reason why his recollections may
 9 have contaminated yours, no?

10 **A.** Well, okay. Yeah. Yeah.

11 **Q.** Could I have, please, INQ00001035, please.

12 **A.** Could I just also add to that that, as
 13 an attendee coming in as a witness, I did think
 14 it was important to me to have an understanding
 15 of how a witness session is conducted. And so
 16 I have watched Andy Winn's and that's helped me
 17 partly to understand the context of the
 18 environment to which I would be coming in.

19 **Q.** Could we go down, please, to page 4. I'm trying
 20 to find the internal numbering, page 14. Could
 21 we zoom in on page 14. Thank you very much. If
 22 we pick up at line 22. This is Tracy Felstead,
 23 giving an account of being interviewed by Post
 24 Office investigators.

25 **A.** Right.

80

1 Q. The questions are obviously coming at this stage
2 from Counsel to the Inquiry. All right? So
3 then Q and then A. So I'll read through sum of
4 the Q&A, please:

5 "Question: What did they ask you and what
6 did you say?

7 "Answer: They asked me where the money had
8 gone, what I'd done with the money. Never at
9 any stage was it 'What do you think has
10 happened, was there any reason for this to
11 happen?' It was very much I was being asked
12 constantly what have I done with the money,
13 'Where has the money gone?' I was being accused
14 from day dot."

15 Then if we go, please, to page 17, internal
16 numbering, line 22 again. Just above line 22,
17 sorry, I've got the wrong line number there:

18 "Question: So you were being asked to prove
19 how you had not committed a crime?

20 "Answer: Yes.

21 "Question: Is that how the interview went?

22 "Answer: Yes, yes, very much so. They had
23 access to my bank accounts. They had access to
24 my home. They never, ever came to my home or
25 searched my home but they looked through all the

81

1 a defence, one that, in fact, you knew about.
2 What did you do to make sure that investigators
3 approached these cases knowing that there were
4 possibly reasons why people were not responsible
5 for thefts when Horizon said there was money
6 missing. What did you do to make sure
7 investigators knew that?

8 A. I don't know what I did to ensure objectivity.
9 That doesn't sound objective. I'm agreeing with
10 the point you're raising. I don't know what
11 I did to do that.

12 Q. Well, you were the one who was in charge of
13 investigators. Did you think it was your job to
14 make sure that investigators were objective?

15 A. I would like to think that I did. I think --

16 Q. But you don't know what you did to put that into
17 effect?

18 A. No. I probably didn't put anything into effect,
19 and let me just expand on that. So the conduct
20 of a case, the investigators reported to me,
21 rightly or wrongly, most of my focus with the
22 investigations team -- when Security was split
23 into two, from physical Security to
24 Investigations, I was given the investigations
25 team primarily because there was felt to be

83

1 bank accounts. There was no money to find
2 because there was no money there."

3 So this was in 2001. So it was before your
4 time.

5 Thank you, that can come down.

6 But we can see there, can't we, that the way
7 that the investigation went, the way that the
8 investigators conducted it, was on the
9 assumption that there was fault. There was not
10 an impartial or open questioning. It was almost
11 a reversal of the burden of proof from the
12 start, wasn't it?

13 A. That -- yes.

14 Q. Yes?

15 A. Yeah.

16 Q. That's what we see there.

17 A. Yeah.

18 Q. You've told us about how you knew that passwords
19 and user IDs were shared and not necessarily
20 used as they should have been to identify who
21 was doing what?

22 A. Yeah, yeah.

23 Q. That was actually what was going on in Tracy
24 Felstead's case. That was the defence that
25 she'd put forward. So, plainly, she had

82

1 a linkage between audit risk modelling that the
2 audit team did and the fraud risk modelling that
3 the fraud risk team did and, therefore, the two
4 teams came together.

5 Rightly or wrongly, my focus during that was
6 about the data that was enabling the targets
7 through the risk modelling. The relationship
8 between the investigators was very much that
9 a case was compiled and was present to the
10 Criminal Law team and there was an oversight of
11 that by the Criminal Law team. So I was the
12 head of a team that had the investigations team
13 in it, but I was not qualified of
14 an investigations background but I felt assured
15 that there's a relationship between the Criminal
16 Law team and the investigators that was
17 overseeing the way in which case files were
18 compiled.

19 Q. Well, let's just look at the document that
20 Mr Beer, King's Counsel took you to. It was
21 significantly after your time, but appears to
22 have been the only document we can find which
23 deals with the way investigations were carried
24 out.

25 A. Right.

84

1 Q. So that's POL00038853. If we can go down to
2 page 25, please. If we zoom in on 5.19.10,
3 paragraph 5.19.10. This comes after a series of
4 paragraphs explaining the way that the
5 decision-making process for when to charge
6 somebody comes about, and this is the sort of
7 culmination of it. It says that the Post Office
8 Legal and Compliance Team then goes to Head of
9 Security. You see that arrow, that's being used
10 in these paragraphs as a way to suggest that the
11 decision moves from this team to that team.

12 A. Okay.

13 Q. So this final decision goes from Post Office
14 Legal and Compliance to Head of Security:
15 "The file is then forwarded to the
16 designated prosecution authority (DPA) for
17 authority to proceed. The DPA will review the
18 case file and decide whether to proceed with the
19 advice from the POLCT [the POL Legal and
20 Compliance Team] and Cartwright King or whether
21 to take a different course of action. The
22 authority to proceed (or other instruction) will
23 be inserted into the case file."

24 So, in other words, quite clearly it was
25 Head of Security that took the final decision on

85

1 document. This is -- if we could also just have
2 a quick look at page 87, which I think is the
3 one we've actually looked at before.

4 Do you remember you saw this email in which
5 Mr Utting was sort of making a pitch, if you
6 like, for --

7 A. Yes, yes.

8 Q. -- the work of doing civil investigations?

9 A. Yes, yeah.

10 Q. At this time, you were still his boss, yes?

11 A. Yeah, yeah.

12 Q. I just wondered if you recognise the handwriting
13 at the top of that email or on the preceding
14 page?

15 A. No. No.

16 Q. If we zoom in a bit on that handwritten page and
17 see if we can make out what some of it says:

18 "There is a need to work up a business case
19 to obtain additional resource, possibly from
20 Chesterfield."

21 I'm just trying to see on the page where
22 I got that from. Oh, yes, I think it's
23 paragraph 1 there. Can you just about see that:

24 "Issues with Civil Litigation Cases:

25 "need a business case to be worked up to get

87

1 whether to charge someone, not the Legal and
2 Compliance team.

3 A. Well, it wasn't coming to me as a decision, so
4 when I was Head of Risk and Control, including
5 the investigations team, things weren't coming
6 to me to say, "Rod, what do you decide about
7 this?" Things were being -- a case was
8 compiled, and there was a relationship into the
9 Criminal Law team on that and I think the
10 criminal law team would, if necessary, have had
11 conversations, I think, with the Director of
12 Public Prosecutions area, and the approach was
13 through them. It was not to me to say "Rod, do
14 you approve this?" No.

15 Q. Thank you, the document can come down.

16 So your evidence is that, some time after
17 your time, there was a process change which
18 meant that the final decision lay with Head of
19 Security rather than Legal?

20 A. Yeah.

21 Q. All right. Can we please look at a document
22 which you have looked at, but I'd like to just
23 look at some other parts of it, if I may,
24 please. It's in document number POL00090437.
25 We're going down to page 86 of this rather long

86

1 additional resource -- could come from
2 Chesterfield."

3 Then there's a mention apparently of Dave
4 Hulbert. Is that ringing any bells with you?

5 A. That -- I can't remember this document, but the
6 kind of theme of what's in it rings a bell with
7 me, in that I think we were, as we saw
8 yesterday, going through headcount reduction
9 exercises regularly and I think, certainly, the
10 concept of if something -- if something new
11 needed resourcing up, given that there was
12 a headcount reduction target in another area but
13 perhaps a need for resource somewhere else, it
14 might have been that somebody could have been
15 redeployed out of the Chesterfield team to work
16 on something else.

17 So the idea of it doesn't seem unreasonable,
18 to me, that if the Security team, the
19 investigations team was looking for some
20 resource, then maybe some resource would have
21 come out of a restructuring of Chesterfield.
22 That makes sense. I don't remember this thing
23 but that would make sense to me.

24 Dave Hulbert is in IT, so whether in IT they
25 would have had resource, I don't know.

88

1 Q. Does it suggest any kind of a link between
 2 Chesterfield and Security?
 3 A. Well, I think -- I mean, there is a link,
 4 because the nature of what Security might have
 5 been looking for somebody to do with data
 6 gathering and, given that a number of pieces of
 7 data that would feed into security risk
 8 modelling were data that were coming from
 9 Chesterfield, then there absolutely was a kind
 10 of an almost resource in Chesterfield who would
 11 have an element of experience that would give
 12 them the capability to help another team.

13 So that -- there was a natural knowledge
 14 opportunity that there would be a linkage there,
 15 yeah.

16 Q. Was there a sense in which Security was sort of
 17 running parts of the business, Legal,
 18 Chesterfield, Security in charge?

19 A. No, I don't think so. I think it was a thing
 20 that those teams would have been speaking to
 21 each other during the course of things and there
 22 was sort of some common skills between those
 23 areas or common process understandings that --
 24 and common -- the Chesterfield teams and the
 25 security teams would both have had

1 organisation about templates of stuff. In my
 2 current job, I speak to peers in other
 3 organisations and we discuss templates of things
 4 because why recreate the wheel if somebody has
 5 got the sort of eight headings that are
 6 a structure for something?

7 So the idea that they may have compared
 8 a template between the two makes sense to me.
 9 I don't recall the conversation but it makes
 10 sense to me that they may have discussed the
 11 template.

12 Q. So you weren't involved in Mr Utting helping
 13 Fujitsu to draft their templates?

14 A. No, no. No, I wasn't. And let me be clear
 15 about the word "template" in there. A template
 16 is a structure of something. It is not the
 17 content related to a particular case. So it
 18 would make sense to me that two organisations
 19 might speak to each other about does a document
 20 have an executive summary, an index, an author's
 21 page? That is the sort of template that I'm
 22 talking about.

23 Q. Do you know whether Mr Utting gave any thought
 24 or did you give any thought to the possibility
 25 that these might be used by "expert witnesses"

1 an understanding of product transactions in
 2 branches and, therefore, somebody going either
 3 way between the two teams could help the other
 4 team by hitting the ground running, with some
 5 standing knowledge of processes.

6 Q. Can I pick on another point on the next page,
 7 third paragraph of the email that we looked at
 8 yesterday. In the paragraph beginning
 9 "Because", Mr Utting says this, as part of his
 10 pitch:

11 "Because we also have strong ties with the
 12 Security and audit function within Fujitsu, we
 13 are also able to take witness statements from
 14 them in support of prosecution cases and could
 15 use the same links in support of Civil matters
 16 ..."

17 Then he says, in brackets:

18 "... (indeed, the standard statements that
 19 they currently provide to us in prosecution
 20 cases were originally drafted with somebody from
 21 our team)."

22 Do you know anything about that, with them
 23 providing standard form statements to Fujitsu?

24 A. I don't, but I am aware that where there are --
 25 often, an organisation will ask another

1 and the sort of format that an expert witness
 2 ought to use?

3 A. Well, I don't think I did. But I would have --
 4 I would think that Tony may have had experience
 5 of working with expert witnesses and, if there
 6 was some knowledge of what does an expert
 7 witness do, then, quite, that may have informed
 8 something about a template. As I say, that is
 9 about a template, not about case-specific
 10 content.

11 Q. All right. Well, let's move on to case-specific
 12 content in the case of Mr Castleton. Could
 13 I have, please, document number POL00107426. If
 14 we just have a look at the date first. This is
 15 the November of the previous year to the one we
 16 were looking at, so it's 2005. So presumably
 17 you're still in investigations at this stage,
 18 yes?

19 A. Yeah.

20 Q. Or you're leading investigations?

21 A. Yeah.

22 Q. If we just scroll down a bit and sort of come up
 23 from the bottom, as we do with email chains,
 24 I think I'm right in saying, I think it may be
 25 one of these ones which has blank pages. Yes.

1 If we just pause here, please, and go back and
2 just have a look at who that was sent to, which
3 includes you.

4 It comes from Mandy Talbot and goes to David
5 X Smith -- and I think we're all clear that's
6 the head of IT, rather than the much later MD,
7 Dave Smith?

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

9 **Q.** Jennifer Robson, Tony R Utting, and you, as well
10 as some other copies in. So this is Mandy
11 Talbot describing a little bit background on the
12 Castleton case and what has happened so far:

13 "Proceedings have been issued by POL against
14 Lee Castleton the former postmaster at Marine
15 Drive for £27,000. It was known by the business
16 prior to the issue that Lee Castleton blamed
17 Horizon for the losses. External solicitors
18 were asked to check with the Fujitsu liaison
19 team and to assure themselves that the evidence
20 in respect for Horizon was sound before the
21 issue of proceedings. There had been no
22 security investigation so the data had not been
23 requested from Fujitsu.

24 "Proceedings were issued and a defence and
25 counterclaim for losses flowing ..."

93

1 that involving a Mr Bajaj, was also challenging
2 the validity of data supplied by the Horizon
3 System.

4 Then, if we carry on down and past the blank
5 page, she talks about there being other
6 postmasters potentially in a similar situation:

7 "His solicitors say that they have been
8 contacted by other postmasters and that a class
9 action is possible, unless the deductions from
10 remuneration are refunded. They also make
11 a reference to what we assume is the Castleton
12 case."

13 She talks about "Issues":

14 "In each case the postmasters are
15 challenging the validity of data provided by the
16 Horizon System and the cases became litigious
17 before that evidence could be properly
18 investigated.

19 "In each case it was known that Horizon was
20 going to be challenged but there was no
21 procedure in place to:

22 "(a) acquire the necessary data

23 "(b) identify somebody with the relevant
24 knowledge and capacity to interpret the data and
25 report on the same.

95

1 She then goes on to describe how the court
2 ordered a stay and that there was some mistakes
3 made and a judgment in default was filed by
4 Mr Castleton. So I'm just sort of summarising
5 a bit here. She describes how there was a short
6 hearing and, as a result, the judgment in
7 default was set aside. So if we go down to the
8 next paragraph:

9 "As part of the claim the solicitors for Lee
10 Castleton have stated in the allocation
11 questionnaire that they intend to call evidence
12 from other existing and former postmasters about
13 the problems with the Horizon System. They have
14 also asked for disclosure of data about all
15 calls or complaints logged from postmasters
16 about the Horizon System, presumably from the
17 inception of the system. They have called for
18 disclosure of all documents removed from the
19 branch office during the investigation. There
20 is an issue over locating all these documents."

21 All right? So solicitors acting for
22 Mr Castleton had asked for very significant
23 disclosure of problems with Horizon, yes?

24 **A.** Yes.

25 **Q.** If we go down, she sets out how another case,

94

1 "If the challenge is not met the ability of
2 POL to rely on Horizon for data will be
3 compromised and the future prosperity of the
4 network compromised.

5 "Fujitsu's reputation will be affected."

6 She goes on to make "Suggestions":

7 "1. A robust procedure is set up and
8 communicated to all relevant parties for
9 extracting necessary data from Horizon at
10 an early stage in all cases leading towards
11 possible termination of contract in each case
12 where the Horizon System data is challenged.

13 "2. This will necessitate expenditure by
14 POL in identifying a small team and training
15 them in interpretation and investigation
16 techniques.

17 "3. Fujitsu and POL to liaise on
18 identifying a number of individuals or
19 specialist computer firms who could provide
20 a professional and independent report upon the
21 Horizon System in general and in the two cases
22 to hand if necessary.

23 "4. POL/Fujitsu investigate and identify
24 whether or not they do hold any data upon the
25 number of complaints made by postmasters about

96

1 the Horizon System since inception and whether
2 or not it can be broken down into statistics
3 about valid problems/resolutions/errors by
4 postmasters.

5 "5. Identify current members of POL or
6 Fujitsu staff too can provide statements in the
7 two current cases which (a) validate the system,
8 (b) explain the Horizon System process from
9 end-to-end and (c) can explain why each and
10 every point made by the Defendants is irrelevant
11 or can be explained."

12 Forgive me for reading that out at some
13 length but it has been sent to you and to
14 Mr Utting and this is back in 2005. So you're
15 plainly aware, at this stage, of a significant
16 number of complaints from subpostmasters about
17 Horizon, aren't you?

18 **A.** I am, and as I said yesterday, I was aware of
19 the Cleveleys case, that referred to -- which
20 was something which I'd asked --

21 **Q.** It wasn't just the Cleveleys case, was it? It
22 was quite number of cases, yeah?

23 **A.** Yeah.

24 **Q.** Not forgetting, of course, that, in the
25 Cleveleys case, POL lost, didn't it? Post

97

1 specialist computer firms who could provide
2 a professional and independent report?

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

4 **Q.** Well, it was addressed to you; do you not know?

5 **A.** No.

6 **Q.** What happened to her suggestion that POL and
7 Fujitsu should investigate and identify the data
8 about the number of complaints made by
9 subpostmasters about the Horizon System since
10 inception? What happened to that suggestion?

11 **A.** I don't know but I would suggest that the
12 handwriting that you showed me on the previous
13 one suggests maybe that was a follow-on to that,
14 but I don't know what then happened as
15 a follow-on to that.

16 **Q.** The email that you were taken to by Mr Beer,
17 King's Counsel about possible settlement --
18 sorry, that document can be taken down now.
19 Thank you very much.

20 Do you recall that you were shown an email
21 about settlement of the Castleton case, possible
22 settlement?

23 **A.** I was shown so many documents yesterday. I'm
24 happy for you to represent the thing. I can't
25 remember what documents I saw yesterday but

99

1 Office lost?

2 **A.** Well, I can't remember exactly what happened
3 then but, yeah, I think --

4 **Q.** Can you not remember that the Cleveleys case was
5 one that the Post Office lost?

6 **A.** I can recall what these documents have showed
7 me. I can't remember the circumstances of the
8 Cleveleys case but I think one of these
9 documents says that something like £186,000 was
10 paid out because there was a lack of records to
11 respond to it. I can't remember that as my own
12 experience of something that was shared at the
13 time but that was in one of these documents in
14 the bundle. So I do know that because you have
15 had shown me a bundle document that refers to
16 that thing back then, yes.

17 **Q.** On receiving this email, did it not occur to you
18 to start wondering whether there was a problem
19 with the Horizon System?

20 **A.** I think I was still being assured by IT that
21 there wasn't.

22 **Q.** Still that verbal assurance, was it?

23 **A.** Yeah.

24 **Q.** What happened to Ms Talbot's suggestion of
25 identifying a number of individuals or

98

1 please do bring it up and ...

2 **Q.** I hope I won't be trying everyone's patience too
3 much. I'm sure that I'm going to be able to
4 finish by lunchtime. So, with the Chair's
5 indulgence, if we could just look at it again.
6 It's POL00090437. It's at page 63. This is the
7 one where she starts off saying:

8 "I have received some very good news about
9 this case but now need the business to make
10 an urgent decision upon its future conduct."

11 Then she sets out that she's heard that
12 there may be possibility of settlement. In that
13 fourth paragraph:

14 "Last night our barrister received
15 a compromise offer from Castleton's solicitors
16 ..."

17 Do you remember this one now?

18 **A.** Yes, I do now recall that document being shared
19 yesterday, yeah.

20 **Q.** Thank you. So if we just have a look at the
21 fact that it was sent to a number of people,
22 including you, Marie Cockett, John D Cole, Keith
23 K Baines, David X Smith, Richard W Barker and
24 Rod Ismay.

25 In that first paragraph -- sorry, just

100

1 again, also just to look at "Castleton -- Marine
2 Drive URGENT URGENT URGENT". So it's clearly
3 very urgent in her mind:

4 "I have received some very good news about
5 this case but now need the business to make
6 an urgent decision about its future conduct."

7 So let's just try to understand, then, who
8 does she expect, in the business, to be making
9 an urgent decision about the conduct of this
10 case? Presumably all the people it's addressed
11 to, yes?

12 **A.** I would presume that amongst that audience would
13 be the person that she'd be expecting to make
14 an urgent decision.

15 **Q.** Well, this is a decision about settling the
16 case, so --

17 **A.** Right. I was going to ask you what is it that's
18 the decision that she's asking for. So she's
19 asking --

20 **Q.** Yes, she's asking for, as we've heard already,
21 there's a common terminology. She's asking for
22 instructions about settling the case.

23 **A.** Okay, right, right.

24 **Q.** All right? Because lawyers would not settle
25 a case on their own initiative, would they?

101

1 **SIR WYN WILLIAMS:** Well, is it reasonable to assume,
2 Mr Ismay, that Mr Smith made the decision, as
3 the then Managing Director?

4 **A.** No, well, this was -- this was IT, David Smith.
5 Yes.

6 **SIR WYN WILLIAMS:** Sorry, my mistake.

7 So is it reasonable to assume that the most
8 senior person on that list, whoever that might
9 be, made the decision or is it fairer to assume
10 that there was a collective discussion but you
11 now have no memory of it?

12 **A.** I expect there would have been a collective
13 decision and I think, in terms of seniority of
14 the people, I think there's three, so myself,
15 David Smith and Richard Barker would have
16 been -- we were all part of what was called the
17 leadership group, or something, so we were kind
18 of of a similar level. They may have been
19 a little bit more senior because of the breadth
20 of network responsibility, but --

21 **SIR WYN WILLIAMS:** So we have narrowed it down to
22 the three people on the list. It may be fair to
23 infer that, between you, you made the decision.
24 One last possibility, was it escalated to people
25 even more senior than you or even to the board?

103

1 Obviously, their client has to give instructions
2 on that, yes?

3 **A.** Yes.

4 **Q.** You accept that?

5 **A.** Yeah, and I understand your use of instructions,
6 where you've said instructions to settle the
7 case, so I understand.

8 **Q.** All right. So she's sent this email to these
9 people and she's expecting these people to be
10 able to give her instructions on settling the
11 case.

12 **A.** Okay.

13 **Q.** Yeah?

14 **A.** Yeah.

15 **Q.** And you're one of them?

16 **A.** Yeah.

17 **Q.** So how did you, as a group, go about giving her
18 instructions? How did you go about making
19 a decision on whether to settle the case?

20 **A.** Well, I don't know.

21 **Q.** Again, you don't know?

22 **A.** No. And I'm sorry, and I know people are
23 recording how many times witnesses say, "I don't
24 know" but I -- genuinely, I can't remember what
25 happened back in 2006 on this.

102

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

2 **SIR WYN WILLIAMS:** Well, do you know whether any of
3 those things happened?

4 **A.** No. And I'm sorry, I'm genuinely sorry.
5 I can't remember, I don't know.

6 **SIR WYN WILLIAMS:** What we do know is that it wasn't
7 settled, so someone somewhere must have made
8 these decisions.

9 **A.** Yeah, so I accept that. A decision must have
10 been made somehow, yeah.

11 **SIR WYN WILLIAMS:** Right. Okay.

12 **MS PAGE:** Perhaps we could turn to POL00069775, and
13 to page 2. If we look at this email, which is
14 to Mandy Talbot, following on, it seems, or
15 around the same time. It goes to a similar but
16 slightly different group. It's from Keith K
17 Baines and it's copied to Biddy Wyles, Clare
18 Wardle, John D Cole, Marie Cockett, Richard W
19 Barker, Rod Ismay, Stephen Dilley. Keith Baines
20 is suggesting that, as part -- this is part of
21 the proposed way of perhaps settling the case.

22 **A.** Okay.

23 **Q.** He says:

24 "I have a few minor changes to suggest ..."

25 Just to give you the context, Ms Talbot had

104

1 already suggested a wording and he's then giving
 2 a proposed rewording of a statement from
 3 Mr Castleton to make as part of the proposed
 4 settlement.

5 **A.** Right.

6 **Q.** He says the revised text suggested is this:

7 "I Mr Lee Castleton the former postmaster
 8 at Marine Drive Post Office, Bridlington admit
 9 that a sum of money was owed by me to Post
 10 Office Limited as a result of errors which arose
 11 whilst I was the postmaster at the above office.
 12 I had thought that this debt arose due to
 13 a malfunction of the Horizon System but I now
 14 accept that I was mistaken and that the debt
 15 arose out of human error. I declare that the
 16 Horizon System did not contribute to the errors
 17 in any way and formally withdraw all statements
 18 I made to the contrary'."

19 Does that ring any bells? Do you remember
 20 this desire to have Mr Castleton make such
 21 a statement?

22 **A.** I don't, but I'm clearly part of that chain but
 23 I can't remember that, but I am part of that
 24 chain.

25 **Q.** So you've got no recollection of who came up
 105

1 Richard W Barker, Tony R Utting, Graham C Ward,
 2 and copied to Doug Evans:

3 "This is just to let you know that we have
 4 been completely successful in defending all the
 5 allegations made by Mr Castleton. You well
 6 recall that he contended that no genuine losses
 7 occurred whilst he was a postmaster and that any
 8 losses were manufactured by the Horizon System.
 9 The judgment has entirely vindicated the Horizon
 10 System."

11 She goes on to explain a little more about
 12 the technicalities. If we scroll up to your
 13 reply, this is from you and back to the same
 14 group:

15 "Thanks Mandy -- great news. And thanks to
 16 everyone in this email and in your teams as
 17 I know you have had to do a lot of work in
 18 supporting the defence case here. Like you, my
 19 team faced a stack of witness interviews and
 20 court attendances at one time so the progress
 21 and conclusion here is great news.

22 "What can we do on a proactive comms front
 23 here? We've watched the various in inflammatory
 24 letters in the SubPostmaster letters page and
 25 wanted to be able to assure branches and clients
 107

1 with the idea of that --

2 **A.** No.

3 **Q.** -- or how it was that POL had come to the view
 4 that it could assert that the debt arose out of
 5 human error?

6 **A.** No, I haven't.

7 **Q.** No recollection of trying to find out whether
 8 that statement would, in fact, have been true?

9 **A.** No. I haven't got a recollection of that. My
 10 recollections are based on the documents that
 11 I've got in these packs, including Helen Rose's
 12 statement to the court in 2006.

13 **Q.** Well, one more document, if I may, on the
 14 Castleton case, which includes a response from
 15 you. So perhaps may provoke more memory.

16 **A.** Right.

17 **Q.** POL00090437, and it's page 33 this time. If we
 18 look at the email from Mandy Talbot first and
 19 then we'll scroll up to your reply.

20 Mandy Talbot to Clare Wardle, Biddy Wyles,
 21 Rob G Wilson -- so that's the head of criminal
 22 law, isn't it?

23 **A.** Yes.

24 **Q.** Rod Ismay, Marie Cockett, Keith K Baines, David
 25 X Smith -- so that's again the head of IT --
 106

1 ..."

2 Clients?

3 **A.** Clients as in corporate clients, such as in
 4 National Savings or banks -- corporate clients
 5 of the organisation.

6 **Q.** "... that they can rely on the integrity of
 7 Horizon.

8 "We've had some good articles in the
 9 SubPostmaster about NBSC, Online Service and
 10 Cash In Transit. I am planning briefs on what
 11 P&BA does.

12 "Any thoughts on comms following this case?"

13 Mr Ismay, you told use you were not
 14 particularly concerned or interested in comms;
 15 is that correct?

16 **A.** Clearly this says that I was. So -- and I know
 17 that, further to this, there was pictures of my
 18 team and a description of what Product and
 19 Branch Accounting did that either went into the
 20 SubPostmaster Magazine or PO Focus Magazine, so
 21 I know we had things about communicating what
 22 the nature of the team was at some point during
 23 my tenure in that job.

24 **Q.** In 2007, you were very well aware of
 25 a significant number of postmaster complaints
 108

1 about Horizon, weren't you?
 2 **A.** Yes, yes, yes.
 3 **Q.** You were, along with others in the chain that we
 4 looked at earlier, content to assert that this
 5 was completely wrong and it was all down to user
 6 error, weren't you?
 7 **A.** Yes, and that was based on lots of the other
 8 information, examples of which you haven't
 9 shared but which are in the bundle, for example
 10 Helen Rose's statement on that case.
 11 **Q.** Was that because user error was an easy cover
 12 for failures in Chesterfield procedure?
 13 **A.** No. It wasn't, and I would refer to that other
 14 document I've mentioned a couple of times, that
 15 the description in that one, the examples where,
 16 in a number of cases, auditors would go into
 17 branches and find safes open, doors open, money
 18 left unattended. It does not mean that it's
 19 clear what -- where -- which individual may have
 20 taken some money or indeed if they did.
 21 However, there were a lot of security
 22 situations identified and the examples are in
 23 Helen's note on this one, that she submitted to
 24 the court in 2006, that says that when they went
 25 into that branch, they found the safe open,

109

1 branches that are on your mind, it's clients.
 2 Clients are on your mind.
 3 **A.** Yes. Yes.
 4 **Q.** Because if clients identified discrepancies or
 5 problems in accounts coming from Chesterfield,
 6 that would present a real problem, wouldn't it?
 7 **A.** If clients were not trusting data, then that
 8 would beg a commercial question, and it's
 9 interesting that there's certainly a case of
 10 something where there was a National Audit
 11 Office report about a client that we worked with
 12 who was challenging the data that we'd got, and
 13 the audit -- the national audit report confirmed
 14 that the issue was at the client end not at our
 15 end.
 16 **Q.** Thank you. That document can come down.
 17 You have agreed, haven't you, with Mr Andrew
 18 Winn, that the IMPACT Programme resulted in
 19 significant problems with data feeds in Product
 20 and Branch Accounting. Yes?
 21 **A.** Yes, I did and I know in the transcript there
 22 will be about five or six points I raised
 23 yesterday that were those reasons: screens being
 24 slow, data coming in and having to be backed out
 25 again, yes. Yes.

111

1 doors open, and the other comments that are in
 2 that note.

3 So I would say that, in this case, that kind
 4 of description of the circumstances of the
 5 experience of the branch audit would have been
 6 something that would have influenced the -- my
 7 view and others' view in the organisation, about
 8 that case.

9 Clearly, if it turns out that there were,
 10 you know, genuine allegations about the nature
 11 of the system, I realise, as Justice Fraser
 12 said, that that calls into question the ability
 13 to use that as evidence in the case, but the
 14 mindset of the organisation and my understanding
 15 was that the audit findings were such as they
 16 were and as are described in that bundle
 17 document, and that was what would have
 18 influenced my thoughts.

19 Now, I couldn't remember that particular
 20 document until I've seen it in this bundle but,
 21 looking at what was in that statement, that four
 22 or five-page statement, that is the sort of
 23 thing that would have influenced my thoughts at
 24 the time.

25 **Q.** We see here, don't we, that it's not just

110

1 **Q.** You say that you raised your concerns. We
 2 haven't seen anything in writing. Did you put
 3 your concerns in writing?

4 **A.** I don't know if I put it in writing or not.
 5 I think there's one thing that's in one of these
 6 bundles where I did.

7 **Q.** Well, if we look at your report, which is
 8 POL00026572, this is your report for Mr David
 9 Smith, MD.

10 **A.** Right, right.

11 **Q.** If we look at page 16. This your list of
 12 problems with Horizon that you've identified.

13 **A.** Yeah.

14 **Q.** (e) is "Horizon/POLFS differences":

15 "In 2005, P&BA moved onto a SAP system
 16 (POLFS). This was an exceedingly complex IT
 17 migration and there were some issues in
 18 management of the cut-off which meant P&BA was
 19 out of sync with some branches in terms of
 20 opening balances for cash and bureau. This did
 21 not affect the integrity of Horizon and has been
 22 catered or in error resolution with branches but
 23 it has affected service to some branches,
 24 ie where decision making on cash supply was
 25 based on wrong data centrally. Some issues have

112

1 continued to come to light recently but this is
 2 now under control. It is not relevant to the
 3 allegations."
 4 Is that what you were talking about?
 5 **A.** Yes, that's what I was talking about and those
 6 kind of things, although I've said that they
 7 were under control, they would have been things
 8 that were causing immense frustration in my team
 9 about having to deal with those things. And
 10 that was the kind of sentiment that Andy was
 11 experiencing when he said he could feel, you
 12 know, frustration around the team.
 13 **Q.** So, contrary to raising your concerns, you're in
 14 fact minimising the problem, aren't you,
 15 Mr Ismay?
 16 **A.** Well, I've set out in -- I've set out here that
 17 there were issues in my team. I agree that, in
 18 there, I haven't said -- and I think the words
 19 that I used yesterday was that I was livid about
 20 some of the things with the IT team, that the
 21 number of file errors, that we were having to
 22 put a file --
 23 **Q.** You don't sound very livid with them here, do
 24 you?
 25 **A.** I --

113

1 I used in the Cleveleys one, of where IT said to
 2 me it was -- there were unfounded allegations.
 3 So we felt we were responding to unfounded
 4 allegations.
 5 I acknowledge, in the context of everything
 6 that's coming out in the Inquiry, there's
 7 a question about "Well, perhaps it wasn't
 8 unfounded", but at the time, I believed from
 9 what was being described to me by other teams,
 10 who were saying it was unfounded but, obviously,
 11 we would have had a concern, would a corporate
 12 client look at these potentially unfounded
 13 observations and themselves think "Well, we
 14 can't trust that organisation, so we'll put the
 15 business somewhere else".
 16 So, yes, there would have been that concern,
 17 but in the context of the organisation believing
 18 that it was unfounded allegations.
 19 **Q.** There would have been concern likewise, would
 20 there not, about what we call the multis or the
 21 big franchises that operated multiple branches.
 22 You wouldn't have wanted them finding out
 23 either, would you?
 24 **A.** We wouldn't have wanted them to be thinking that
 25 the system didn't work either, no.

115

1 **Q.** "It is not relevant to the allegations".
 2 **A.** No, and I don't think that, writing a document,
 3 lividity is necessarily a way of writing
 4 a document. But I certainly had conversations
 5 with colleagues in IT to say "This is wholly
 6 unsatisfactory, the number of files that we're
 7 having to wait another day for you to back out
 8 and put back in again". I definitely had those
 9 conversations. Whether I've put them in emails
 10 or not, I don't know, and I should have.
 11 **Q.** Thank you. The document can come down now.
 12 Thank you very much.
 13 You and POL management generally, no doubt,
 14 were worried that big clients like the banks and
 15 the utility companies would hear of the problems
 16 in your department, no?
 17 **A.** No, I and the Post Office would have been
 18 concerned if clients perceived there to be
 19 a problem, yes. We would have been concerned
 20 that clients would think, "Well, perhaps
 21 PayPoint or somebody else can do that work for
 22 us". So we wouldn't want to be in a position
 23 where the system wasn't working.
 24 We felt the system was working, but we felt
 25 there was comments, and the description that

114

1 **Q.** No. The solo subpostmasters were a considerably
 2 easier target, weren't they?
 3 **A.** No, because I don't think we would have
 4 wanted -- clearly some subpostmasters --
 5 **Q.** Easier to blame user error than to delve into
 6 the problems that you didn't want anyone to find
 7 out about?
 8 **A.** Could I just respond a bit on that one? So
 9 I think -- I know there is criticism in here of
 10 was the NFSP not a representative body for
 11 subpostmasters? I believed it was
 12 a representative body for members and we were
 13 having conversations with the NFSP to talk about
 14 their perception of issues and allegations that
 15 were being made, and they -- members of their
 16 Executive Committee that we were at meetings
 17 with, who would say, "Well, I'm running a Post
 18 Office, I'm not experiencing these issues and
 19 the people that I talk to aren't experiencing
 20 these issues".
 21 So we had what is an awful situation for the
 22 postmasters who are concerned in this case here,
 23 awful situation for what was -- what we
 24 understood at the time was a minority of Post
 25 Office branches within the network, and I was

116

1 receiving a vibe from National Federation of
2 SubPostmasters colleagues who talked to lots and
3 lots of subpostmasters, who themselves were
4 saying, "Well, my branch, I don't have these
5 problems in my branch, and the members who I'm
6 speaking to aren't having those problems
7 either".

8 So that sort of feedback that, whilst
9 yesterday, I referred to something where --
10 which we may come to in a future phase -- four
11 postmasters, I think, came and did some work in
12 Chesterfield to kind of look at things later on,
13 I was having conversations with the executive of
14 the National Federation of SubPostmasters, who
15 they were feeling -- who are users of the
16 system -- that they were assured through the
17 daily practice of using the system.

18 And that's the context, and another part of
19 the context that led to the things that we're
20 talking about here.

21 **Q.** Mr Ismay, you had a personal interest in
22 suppressing anything that suggested your
23 department was out of control, didn't you?

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

25 **Q.** That's why you were the man to write the
117

1 subpostmasters.

2 This is a horrible situation that we're in
3 here and I'm sorry about how all this has ended
4 up but I was not trying to conceal something in
5 my team. I was openly, with the Post Office
6 Executive and with the NFSP, who are outside of
7 the Post Office, very clear with them that my
8 team, when I inherited it, was in arrears on
9 things, and it took us quite a time to work
10 through getting up to date on that.

11 But I was not concealing that at all, and
12 there will be things that you will be able to
13 find in back issues of SubPostmaster and Focus
14 that indicate exactly that kind of thing.

15 **MS PAGE:** Thank you very much for answering my
16 questions.

17 **THE WITNESS:** Thank you.

18 **SIR WYN WILLIAMS:** Are there any other questions?

19 **MR BEER:** Sir, there are not.

20 **Questioned by SIR WYN WILLIAMS**

21 **SIR WYN WILLIAMS:** I just want to ask one or two
22 further questions, if I may, Mr Ismay.

23 **A.** Yes, thank you.

24 **SIR WYN WILLIAMS:** Really to do something similar in
25 relation to Seema Misra, as you've been doing
119

1 one-sided 2010 review, isn't it?

2 **A.** No. No. It's not. I went into a team that had
3 got backlogs that had arisen because of the cut
4 over issues when the migration into the SAP
5 system went in. I had open discussions with the
6 NBSC and you've probably -- with all the access
7 you've probably got some of the slide shows of
8 things where I've got slides presented to the
9 NFSP talking about backlog resolution and
10 a prioritisation of how we are dealing with this
11 with different products to get up to date on
12 that area.

13 I was totally open with the representatives
14 of the subpostmaster community about the
15 backlogs and the -- my acceptance and the team's
16 acceptance of the importance of getting on to
17 having up-to-date timely conversations with
18 subpostmasters, not raising transaction
19 corrections months and months in arrears.

20 And the branch audit team would get in touch
21 with my team to ask about whether there were any
22 error notices pending or transaction corrections
23 to close that loop during the period where
24 there's a backlog, but I was very much keen to
25 be up to date, working effectively with
118

1 this morning in the Castleton case, but with
2 particular reference to those emails which we
3 pored over yesterday, which were inviting you to
4 agree to further investigations. All right?

5 **A.** Yes.

6 **SIR WYN WILLIAMS:** I don't want to put the documents
7 up on the screen; I want to see if my
8 understanding is correct, all right? Please
9 feel free to contradict me. If Mr Beer thinks
10 that I've not got something right, he can
11 intervene, as well.

12 This all started, as I understand it, with
13 the judge in the Seema Misra case, at
14 a preliminary stage, suggesting that the expert
15 witnesses for the respective parties should meet
16 to discuss various issues; all right? And
17 I think that emerges clearly from that email
18 chain that you saw.

19 **A.** Right. Okay, yeah.

20 **SIR WYN WILLIAMS:** So, not surprisingly, the expert
21 witnesses did meet, and it was following their
22 meeting that the defence solicitor, Issy Hogg,
23 wrote the email which asked, in effect, for
24 permission to carry out three investigations.
25 We needn't concern ourselves with the details
120

1 of the investigation. She was asking, "Will you
2 facilitate these further investigations?" All
3 right?
4 **A.** Okay, yeah.
5 **SIR WYN WILLIAMS:** And that obviously got its way to
6 the POL Legal team, and in particular Mr Singh.
7 And as I understand it, what you've been telling
8 me is that you would have expected Mr Singh to
9 have communicated directly with you as to
10 whether or not that should occur?
11 **A.** Yes, I would have expected him to have
12 communicated directly with me, and for him to be
13 the interface point back into the defence with
14 whatever --
15 **SIR WYN WILLIAMS:** Yeah, I've got that. That's
16 fine.
17 **A.** Yeah.
18 **SIR WYN WILLIAMS:** Now, am I correct, therefore, in
19 thinking that it was for you, ultimately, to
20 make the decision as to whether the requests
21 should be granted, albeit that you expected to
22 have proper input directly from Mr Singh?
23 **A.** I don't think there was any way in which it was
24 appropriate for me to be making a decision
25 there. I think I would have --
121

1 Mr Winn?
2 **A.** Yeah, yeah. Yeah, it was. It looks like it was
3 done by him, yeah.
4 **SIR WYN WILLIAMS:** Right. So on the one hand -- and
5 you may have a point, if I may say so -- you
6 would have expected that Mr Singh would have
7 communicated directly with you, but is it fair
8 for me to consider that you should also have
9 directly communicated, either with Mr Singh or
10 with someone else who you may wish to identify,
11 "Look, this decision is not for me. Please
12 ensure that it is dealt with by the right
13 person"?
14 **A.** Yeah, I think it's quite reasonable for you to
15 say that I should have formally corresponded
16 back with Mr Singh about that.
17 **SIR WYN WILLIAMS:** Right.
18 **A.** I would have expected, then, him to have come
19 back and said, "Well, I haven't heard from you,
20 Rod. This is a legal requirement. You must do
21 it." And it doesn't look like there was any
22 follow-back. So, given everything that we've
23 got and that we've looked at, I can't understand
24 why there then wasn't some follow-back from
25 Mr Singh to say, "You still haven't done this".
123

1 **SIR WYN WILLIAMS:** All right. Well, let's stop at
2 that point, then.
3 Mr Singh clearly is under the impression
4 that you could make that decision. So when it
5 finally came to you, as it did, that you were in
6 effect being asked to make that decision, did
7 you write an email to anyone saying, "This is
8 not for me to determine. It must be determined
9 by Mr X or Ms Y"?
10 **A.** I don't know. I would expect, if I'd sent
11 an email, it would have been produced in the
12 evidence. So --
13 **SIR WYN WILLIAMS:** Right. Well, because what
14 appears to have happened -- and again, I'm
15 choosing my words carefully -- what appears to
16 have happened is that you did engage with it to
17 the extent of discussing it with Andrew Winn.
18 **A.** Yes, it looks like Andy received the message
19 from Jon Longman, and Accounts came to me, and
20 then I evidently expressed concern about
21 an open-ended invite, and --
22 **SIR WYN WILLIAMS:** Yes, sure. You did engage with
23 it with Mr Winn but, as far as you can remember,
24 at least, you didn't send an email to anyone
25 expressing your reservations. That was done by
122

1 **SIR WYN WILLIAMS:** All right. What we do have was
2 an email some weeks later which appears to
3 suggest that you did, in fact, make a decision
4 that those investigations weren't to be
5 facilitated. Mr Beer has asked you about that,
6 so I'm not going to go over that ground again.
7 **A.** Yeah, yeah.
8 **SIR WYN WILLIAMS:** But if you didn't make the
9 decision not to facilitate the investigations,
10 do you know if anybody else addressed their
11 minds to that?
12 **A.** I don't know if anybody else did but, again, I'd
13 think that it should have been a black and white
14 decision for Mr Singh to know should this happen
15 or not? And if it hadn't happened, I would have
16 expected, under the kind of professional
17 processes that a solicitor would go under, that
18 they should think, "This should have happened.
19 It hasn't happened. I need to make sure it
20 happens".
21 **SIR WYN WILLIAMS:** All right. As far as you were
22 concerned, you have never seen a document in
23 which someone has made a decision, a clear
24 decision, that these investigations would not be
25 facilitated; is that right?
124

1 A. Yeah, yes. That's correct.
 2 **SIR WYN WILLIAMS:** Okay, well, I think have
 3 understood it and I don't think you've needed to
 4 contradict the way I've expressed it here in
 5 terms of your own involvement in this; is that
 6 fair?
 7 A. Yeah. Sorry, could you ask that question again?
 8 I'm sorry.
 9 **SIR WYN WILLIAMS:** Yes. I mean, as we were going
 10 through it, you didn't say to me, "Sorry, Chair,
 11 you've got that wrong", or, "That's not right",
 12 and all the rest of it. So I've got the basic
 13 factual chronology correct, have I?
 14 A. Yes, I think you have. Would it be possible for
 15 me to replay something to you, to make sure I've
 16 understood what you --
 17 **SIR WYN WILLIAMS:** Yes, by all means, yeah.
 18 A. My fundamental point is that I really would have
 19 expected the solicitors to know whether or not
 20 something shouldn't be done, and it was for them
 21 to make that decision, not for me to.
 22 **SIR WYN WILLIAMS:** Well, can I put this to you,
 23 then, just as a slight nuance, so that nobody is
 24 under any misapprehension: it may very well be
 25 said by the solicitors -- I don't know, we'll
 125

1 **SIR WYN WILLIAMS:** Fine. All right. Thank you.
 2 **THE WITNESS:** Thank you.
 3 **SIR WYN WILLIAMS:** Thank you very much for answering
 4 questions over a day and a half. I think
 5 Mr Beer did say that it was possible that you
 6 may be asked further questions in due course.
 7 If you are to be asked further questions in due
 8 course, then, as with this current session,
 9 you'll be served with what's called a Rule 9
 10 Request outlining the areas about which you
 11 should answer questions. All right?
 12 A. Okay, I understand, yes.
 13 **SIR WYN WILLIAMS:** Fine.
 14 So that brings this session to an end, does
 15 it, Mr Beer?
 16 **MR BEER:** Yes, it does, sir. We're back at 10.00 am
 17 on Tuesday, please.
 18 **SIR WYN WILLIAMS:** Fine. All right, then. So we'll
 19 adjourn until 10.00 am on Tuesday morning.
 20 Thanks.
 21 **MR BEER:** Thank you very much, sir.
 22 (1.01 pm)
 23 (the hearing adjourned until 10.00 am
 24 on Tuesday, 16 May 2023)
 25

1 have to wait and see -- that they give advice
 2 but they don't make the decision. Do you
 3 understand?
 4 A. Yes.
 5 **SIR WYN WILLIAMS:** Mr Singh may well have said, for
 6 example, "My advice to you [either Mr Ismay or
 7 Mr X, whoever the decision-maker is] is that you
 8 should accede to this request or you should
 9 refuse it", and then explain why. But he
 10 wouldn't be the ultimate decision-maker. Do you
 11 understand the distinction that I'm drawing?
 12 A. Yeah, I -- that's helpful. I do understand
 13 that. Again, I would have then expected that to
 14 be written in some sort of correspondence with
 15 him coming back stating that. But what you've
 16 said makes sense.
 17 **SIR WYN WILLIAMS:** So you and I are in agreement
 18 that there should really be a paper trail
 19 explaining precisely what occurred?
 20 A. Yes.
 21 **SIR WYN WILLIAMS:** At the moment, at least --
 22 Mr Beer may say I'm not on top of certain
 23 documents -- but at the moment, you and
 24 I haven't seen any such paper trail?
 25 A. Yes, I agree. Yeah.

I N D E X

RODERICK MARK ISMAY (continued)	1
Questioned by MR BEER (continued)	1
Questioned by MR STEIN	57
Questioned by MS PAGE	72
Questioned by SIR WYN WILLIAMS	119

<p>MR BEER: [12] 1/5 1/7 48/22 49/5 49/7 49/11 49/13 56/24 57/2 119/19 127/16 127/21</p> <p>MR STEIN: [2] 57/5 71/6</p> <p>MS PAGE: [3] 72/24 104/12 119/15</p> <p>SIR WYN WILLIAMS: [41] 1/6 49/3 49/6 49/12 57/3 71/9 71/22 72/21 103/1 103/6 103/21 104/2 104/6 104/11 119/18 119/21 119/24 120/6 120/20 121/5 121/15 121/18 122/1 122/13 122/22 123/4 123/17 124/1 124/8 124/21 125/2 125/9 125/17 125/22 126/5 126/17 126/21 127/1 127/3 127/13 127/18</p> <p>THE WITNESS: [4] 57/1 71/8 119/17 127/2</p> <hr/> <p>'I [1] 105/7 'I Mr Lee [1] 105/7 'What [1] 81/9 'Where [1] 81/13</p> <hr/> <p>1</p> <p>1.01 [1] 127/22 10.00 [2] 1/2 127/23 10.00 am [2] 127/16 127/19 100 [1] 43/5 10th [1] 63/20 11,000 [1] 34/1 11.06 [1] 49/8 11.20 [2] 49/5 49/10 12 May 2023 [1] 1/1 13 September [1] 15/5 14 [2] 80/20 80/21 140,000 [1] 37/1 15 people [1] 62/6 1545 [1] 50/7 16 [1] 112/11 16 May [1] 127/24 16:38:24 [1] 63/5 17 [1] 81/15 18 February [2] 61/5 66/23 186,000 [1] 98/9</p> <hr/> <p>2</p> <p>2 August [2] 12/13 15/3</p>	<p>2 October [1] 41/1 2.58 [1] 26/2 2001 [1] 82/3 2003 [1] 68/6 2005 [5] 6/19 78/18 92/16 97/14 112/15 2006 [6] 31/20 32/3 32/4 102/25 106/12 109/24 2007 [2] 39/5 108/24 2010 [17] 12/8 17/13 51/5 51/8 51/9 51/12 52/10 56/6 56/7 57/12 57/13 60/22 63/6 64/1 66/25 71/13 118/1 2011 [4] 49/21 51/25 60/18 66/21 2013 [3] 40/21 41/1 42/2 2023 [2] 1/1 127/24 20K [1] 64/15 21 October [1] 26/2 22 [3] 80/22 81/16 81/16 22,350 [1] 34/10 25 [1] 85/2 25,000 [1] 33/17 250,000 [1] 33/18 27 July [1] 15/2 27 July 2010 [1] 12/8 27,000 [1] 93/15</p> <hr/> <p>3</p> <p>3,500 pages [2] 54/23 55/9 3,509.18 [1] 36/5 33 [1] 106/17 36 [1] 35/12</p> <hr/> <p>4</p> <p>40 [1] 64/13 49 [1] 36/5</p> <hr/> <p>5</p> <p>5.19.10 [2] 85/2 85/3</p> <hr/> <p>6</p> <p>6 December 2006 [1] 32/3 60 [1] 36/22 60,000 [1] 36/22 60-65 [1] 35/19 63 [1] 100/6 65 [1] 35/19</p> <hr/> <p>8</p> <p>8 October [1] 63/17 8 October 2010 [1] 17/13 8/10/2010 [1] 63/6 86 [1] 86/25 87 [1] 87/2</p>	<p>9</p> <p>9 November [1] 32/3</p> <hr/> <p>A</p> <p>ability [3] 36/8 96/1 110/12 able [19] 9/6 16/18 20/21 26/20 27/4 37/12 37/14 37/20 45/17 66/7 71/20 77/4 79/3 79/21 90/13 100/3 102/10 107/25 119/12 about [147] above [4] 15/18 26/11 81/16 105/11 absolutely [7] 4/7 4/13 5/6 5/15 16/9 16/21 89/9 accede [1] 126/8 accept [4] 14/11 102/4 104/9 105/14 acceptable [1] 29/12 acceptance [2] 118/15 118/16 accepted [1] 34/23 access [18] 7/1 8/1 8/20 9/10 9/12 9/15 9/19 10/5 11/12 11/12 12/21 13/14 15/20 16/5 77/7 81/23 81/23 118/6 accompanied [1] 18/11 account [3] 64/12 70/4 80/23 accountant [1] 66/6 accountants [3] 34/6 34/7 36/24 accounting [11] 7/4 20/25 32/15 33/5 42/18 42/24 53/11 68/12 70/13 108/19 111/20 accounts [11] 36/5 53/4 53/5 62/15 73/11 74/8 77/7 81/23 82/1 111/5 122/19 accused [1] 81/13 acknowledge [1] 115/5 acquire [1] 95/22 across [5] 13/11 21/8 23/12 23/15 48/12 act [1] 30/1 acting [3] 4/12 75/13 94/21 action [4] 41/15 63/8 85/21 95/9 active [2] 5/9 10/19 activity [1] 21/20 actually [11] 13/1 25/9 31/11 43/13</p>	<p>43/18 44/12 50/16 53/5 55/6 82/23 87/3 ad [1] 14/4 ad hoc [1] 14/4 add [4] 18/20 30/19 69/14 80/12 added [1] 61/18 additional [3] 39/10 87/19 88/1 address [2] 33/3 54/6 addressed [4] 54/9 99/4 101/10 124/10 addressee [2] 32/8 67/8 adequately [1] 70/2 adjourn [1] 127/19 adjourned [1] 127/23 admit [1] 105/8 advance [1] 74/19 advice [4] 39/22 85/19 126/1 126/6 advise [1] 3/17 Advisor [1] 50/11 affect [3] 52/2 52/6 112/21 affected [2] 96/5 112/23 affecting [1] 43/8 after [12] 9/5 16/11 17/14 17/15 26/10 40/10 40/20 49/22 75/14 84/21 85/3 86/16 again [20] 3/25 28/20 38/7 42/2 49/4 59/9 59/22 79/3 81/16 100/5 101/1 102/21 106/25 111/25 114/8 122/14 124/6 124/12 125/7 126/13 against [9] 27/9 33/16 37/4 37/11 39/4 39/12 41/18 51/21 93/13 Agents [3] 15/11 32/21 32/22 ago [4] 3/11 75/12 75/14 76/3 agree [15] 7/16 11/15 30/7 34/13 34/22 37/9 38/4 60/12 66/3 66/10 71/1 71/4 113/17 120/4 126/25 agreed [8] 3/15 3/15 5/5 11/14 17/5 39/7 56/12 111/17 agreeing [3] 35/2 37/4 83/9 agreement [2] 37/5 126/17 aim [1] 37/3 AJ [1] 59/2 Alan [1] 59/13 albeit [1] 121/21</p>	<p>all [64] 11/16 13/22 22/15 26/21 30/4 30/24 34/22 35/9 35/22 40/9 46/11 46/20 49/3 55/8 58/22 58/23 63/22 64/1 64/22 64/23 65/17 67/3 67/14 72/21 74/3 75/19 76/3 77/5 77/12 80/8 81/2 81/25 86/21 92/11 93/5 94/14 94/18 94/20 94/21 96/8 96/10 101/10 101/24 102/8 103/16 105/17 107/4 109/5 118/6 119/3 119/11 120/4 120/8 120/12 120/16 121/2 122/1 124/1 124/21 125/12 125/17 127/1 127/11 127/18 allegation [3] 34/20 36/4 47/2 allegations [16] 8/24 9/4 27/5 33/22 35/10 37/13 37/17 37/24 107/5 110/10 113/3 114/1 115/2 115/4 115/18 116/14 alleged [1] 32/18 allocation [1] 94/10 allow [4] 8/19 12/19 15/24 16/5 allowing [1] 11/12 almost [3] 35/22 82/10 89/10 along [2] 27/14 109/3 already [7] 5/8 8/23 10/24 11/24 25/8 101/20 105/1 also [22] 4/15 17/24 24/25 39/7 39/11 57/16 60/1 67/10 73/21 76/8 77/3 77/13 77/16 80/12 87/1 90/11 90/13 94/14 95/1 95/10 101/1 123/8 although [3] 73/21 77/20 113/6 always [1] 23/21 am [14] 1/2 14/19 49/8 49/10 77/9 79/6 90/24 97/18 105/23 108/10 121/18 127/16 127/19 127/23 amend [1] 66/24 amended [1] 33/24 amending [1] 68/15 ammunition [1] 70/24 amongst [8] 26/4 30/4 31/18 55/8 61/12 61/13 62/4 101/12</p>
--	---	--	---	--

A	77/9 84/21 122/14 122/15 124/2	20/23 22/24 23/2 33/5 33/9 39/17 48/10 48/17 56/17 57/17 57/20 58/9 66/16 67/5 69/7 69/10 70/6 71/19 71/23 72/20 75/20 81/7 81/11 81/18 93/18 94/14 94/22 97/20 120/23 122/6 124/5 127/6 127/7	71/13	banks [2] 108/4 114/14
amount [6] 22/19 36/2 36/9 37/5 37/11 37/15	Appendix [1] 62/13	asking [15] 6/10 13/18 14/9 14/10 14/11 14/14 14/18 14/20 19/1 29/18 101/18 101/19 101/20 101/21 121/1	author's [1] 91/20	bare [1] 34/9
analysis [2] 19/18 55/19	applied [1] 35/15	assure [2] 93/19 107/25	authority [3] 85/16 85/17 85/22	Barker [4] 100/23 103/15 104/19 107/1
Andrew [5] 2/7 60/3 80/2 111/17 122/17	appreciate [1] 67/17	assured [10] 19/2 28/13 31/9 55/12 55/21 56/16 58/1 84/14 98/20 117/16	available [1] 77/20	barrister [2] 34/2 100/14
Andy [10] 3/20 4/15 5/17 15/21 15/22 50/16 80/5 80/16 113/10 122/18	approach [6] 4/19 37/25 51/23 79/14 79/15 86/12	at [151]	avenues [1] 58/1	based [3] 106/10 109/7 112/25
Andy's [1] 4/15	approached [4] 4/3 38/25 75/14 83/3	ATM [3] 43/4 43/11 46/9	avoid [1] 75/3	bashing [4] 26/25 28/9 28/15 28/19
Angela [2] 73/21 75/15	appropriate [5] 4/5 69/24 75/24 80/6 121/24	ATMs [5] 43/4 43/11 44/8 45/20 45/20	await [1] 6/6	basic [1] 125/12
another [22] 4/22 5/12 6/20 10/6 12/3 13/7 13/11 16/17 24/7 38/20 42/1 44/9 44/13 52/14 76/19 88/12 89/12 90/6 90/25 94/25 114/7 117/18	approve [1] 86/14	attack [6] 26/8 26/14 27/1 27/3 27/10 27/21	award [1] 36/22	basis [5] 34/12 35/16 35/17 35/21 36/4
answer [4] 2/22 8/18 31/12 127/11	approved [1] 28/11	attacking [2] 27/10 28/1	awarded [2] 35/17 36/9	be [141]
answered [1] 9/8	approximately [1] 36/25	attempted [1] 16/24	away [1] 51/1	bear [1] 74/3
answering [3] 22/25 119/15 127/3	are [49] 2/2 7/9 8/7 14/11 17/24 18/14 23/6 28/17 28/25 30/1 30/6 33/2 34/4 35/17 47/12 48/19 51/17 56/22 62/11 63/10 63/12 68/19 70/20 71/1 71/14 76/1 77/5 81/1 90/13 90/24 91/5 95/10 95/14 102/22 106/10 109/9 109/22 110/1 110/16 111/1 111/2 116/22 117/15 118/10 119/6 119/18 119/19 126/17 127/7	attend [1] 79/4	awful [8] 13/21 21/24 21/25 22/16 78/25 79/1 116/21 116/23	became [2] 60/23 95/16
answers [2] 31/24 54/12	area [5] 6/15 7/6 86/12 88/12 118/12 127/10	attendance [1] 42/3	BA [4] 1/25 108/11 112/15 112/18	because [48] 1/13 3/3 4/2 4/22 9/6 9/22 18/6 18/14 21/7 22/4 23/7 24/1 25/18 30/24 32/23 36/8 43/14 46/21 47/13 47/24 53/10 58/23 61/22 66/22 67/11 67/22 71/19 72/2 77/12 78/21 79/6 79/18 80/5 82/2 83/25 89/4 90/9 90/11 91/4 98/10 98/14 101/24 103/19 109/11 111/4 116/3 118/3 122/13
Antonio [1] 59/1	aren't [4] 97/17 113/14 116/19 117/6	attendances [1] 107/20	back [53] 12/5 14/22 20/24 22/2 22/21 22/23 23/9 23/16 24/22 25/11 31/20 33/9 35/3 40/19 42/19 43/14 43/17 43/19 47/20 48/8 48/18 52/10 52/16 54/22 54/25 55/9 55/11 56/19 61/3 63/8 63/11 63/18 64/2 64/12 70/7 74/24 75/9 79/2 93/1 97/14 98/16 102/25 107/13 114/7 114/8 119/13 121/13 123/16 123/19 123/22 123/24 126/15 127/16	become [2] 20/14 44/2
any [45] 4/10 11/13 16/11 17/25 18/4 18/7 19/12 20/7 24/22 25/18 27/17 29/19 30/15 31/23 33/6 35/19 35/22 41/19 50/17 56/4 71/24 73/2 73/5 73/6 74/8 77/19 79/22 81/9 81/10 88/4 89/1 91/23 91/24 96/24 104/2 105/17 105/19 107/7 108/12 118/21 119/18 121/23 123/21 125/24 126/24	arisen [3] 52/15 52/17 118/3	attende [1] 80/13	backed [1] 111/24	been [87] 3/2 3/5 3/7 3/23 6/13 6/19 9/2 9/6 10/1 11/8 17/3 18/24 19/5 19/7 19/25 20/1 25/19 28/3 28/12 32/20 32/24 33/5 35/8 36/13 36/16 38/25 42/16 42/19 42/20 43/14 44/4 46/19 48/20 51/4 52/8 52/14 52/15 52/25 53/10 54/24 55/5 56/11 57/17 58/9 61/8 61/18 67/5 67/11 69/13 69/17 71/20 72/7 73/18 75/2 75/9 76/4 76/18 77/4 77/20 82/20 84/22 88/14 88/14 89/5 89/20 93/13 93/21 93/22 95/7 97/13 103/12 103/16 103/18 104/10 106/8 107/4 110/5 112/21 113/7 114/17 114/19 115/16 115/19 119/25 121/7 122/11 124/13
anybody [5] 53/21 74/24 74/25 124/10 124/12	arising [1] 32/19	attende [1] 80/13	backlog [2] 118/9 118/24	BEER [14] 1/4 57/17
anyone [6] 29/4 30/16 74/9 116/6 122/7 122/24	arose [4] 105/10 105/12 105/15 106/4	attende [1] 80/13	backlogs [2] 118/3 118/15	
anything [13] 8/15 8/16 14/18 18/2 25/10 29/5 54/17 70/5 78/3 83/18 90/22 112/2 117/22	around [8] 10/14 14/4 42/17 43/16 47/5 51/17 104/15 113/12	audience [4] 62/3 67/7 67/10 101/12	backwards [1] 40/19	
apparently [5] 62/24 73/9 76/18 78/4 88/3	arrears [2] 118/19 119/8	audit [13] 32/12 33/6 33/10 68/12 84/1 84/2 90/12 110/5 110/15 111/10 111/13 111/13 118/20	bad [1] 20/7	
Appeal [1] 36/17	arrow [1] 85/9	auditors [1] 109/16	Baines [5] 38/21 100/23 104/17 104/19 106/24	
appealing [1] 39/12	article [1] 39/18	August [6] 12/13 15/3 52/10 57/13 66/25 71/13	Bajaj [1] 95/1	
appear [1] 66/12	articles [1] 108/8	August 2010 [4] 52/10 57/13 66/25	balance [1] 64/19	
appeared [2] 65/22 76/23	articulate [1] 56/23		balanced [3] 65/10 65/16 65/22	
appears [7] 36/7 66/2	articulated [1] 24/9		balances [1] 112/20	
	as [133]		bandwagon [2] 26/25 28/9	
	aside [1] 94/7		bank [2] 81/23 82/1	
	ask [15] 7/6 14/21 19/10 21/4 21/12 49/15 51/18 56/25 70/7 81/5 90/25 101/17 118/21 119/21 125/7			

B	black [1] 124/13 blame [2] 70/25 116/5 blamed [1] 93/16 blank [4] 33/12 36/20 92/25 95/4 bluntly [1] 10/4 blurring [1] 46/22 board [2] 68/13 103/25 body [4] 45/13 45/15 116/10 116/12 Bogerd [2] 73/21 74/21 Bond [4] 40/17 40/24 42/3 48/19 bookkeeping [5] 53/15 53/19 53/22 55/6 66/3 boss [1] 87/10 both [4] 30/18 41/4 60/11 89/25 bottom [8] 1/19 6/9 43/6 62/16 62/18 63/2 70/10 92/23 box [1] 62/22 brackets [2] 59/2 90/17 branch [34] 7/4 9/1 20/25 31/7 32/12 32/15 33/4 33/6 33/10 42/18 44/12 53/4 53/5 64/10 64/12 64/16 65/9 65/9 65/13 65/15 65/22 66/8 70/14 73/11 74/8 74/9 94/19 108/19 109/25 110/5 111/20 117/4 117/5 118/20 branches [22] 21/16 41/17 42/25 43/2 45/23 48/1 51/18 58/2 64/13 70/17 70/20 70/24 72/13 90/2 107/25 109/17 111/1 112/19 112/22 112/23 115/21 116/25 breadth [1] 103/19 break [2] 48/25 49/9 Breeden [1] 76/20 Bridlington [1] 105/8 brief [1] 51/19 briefed [2] 18/5 18/6 briefs [1] 108/10 bring [1] 100/1 brings [1] 127/14 broader [2] 9/18 9/21 broken [1] 97/2 brought [2] 33/19 34/4 bubbling [1] 51/1 bug [5] 49/19 50/1 52/2 52/5 67/1 bugs [1] 11/14	bullet [7] 10/2 65/21 70/10 70/12 70/15 70/18 70/22 bundle [7] 42/22 62/12 98/14 98/15 109/9 110/16 110/20 bundles [4] 44/5 73/19 77/6 112/6 burden [1] 82/11 bureau [1] 112/20 burning [2] 13/5 13/9 business [14] 4/25 5/9 24/18 30/8 30/13 41/12 87/18 87/25 89/17 93/15 100/9 101/5 101/8 115/15 busy [1] 67/22 but [125] 3/5 4/2 5/3 5/7 5/13 5/16 6/20 7/7 8/5 10/13 13/16 13/23 15/13 16/18 17/12 21/2 21/9 22/1 22/17 22/21 23/18 23/21 24/25 25/4 25/16 27/25 28/21 29/7 30/5 30/21 31/5 31/10 31/13 32/12 33/3 33/18 38/13 43/6 43/12 44/15 45/2 45/5 45/6 46/16 46/21 47/6 47/19 52/7 52/21 52/23 53/1 54/9 54/12 55/13 55/16 55/23 61/7 62/11 64/11 64/17 67/13 67/19 68/2 68/22 71/18 72/5 74/1 75/17 77/3 77/13 78/10 79/15 81/25 82/6 83/16 84/13 84/14 84/21 86/22 88/5 88/12 88/23 90/24 91/9 92/3 95/20 97/13 98/3 98/8 98/13 99/11 99/14 99/25 100/9 101/5 102/24 103/10 103/20 104/15 105/13 105/22 105/22 105/23 109/9 110/13 110/20 112/22 113/1 114/4 114/24 115/8 115/10 115/17 118/24 119/4 119/11 120/1 122/23 123/7 124/8 124/12 126/2 126/9 126/15 126/23	bullet [7] 10/2 65/21 103/16 127/9 calls [4] 40/16 43/25 94/15 110/12 came [17] 5/13 6/3 10/22 16/15 21/11 25/16 52/22 54/3 55/11 61/3 72/9 81/24 84/4 105/25 117/11 122/5 122/19 can [78] 1/5 1/6 1/8 1/17 1/19 1/22 3/8 7/13 12/5 14/24 15/10 17/10 18/3 18/5 25/21 25/21 25/24 29/10 31/15 34/22 37/7 38/8 38/18 38/19 39/6 40/14 40/14 40/15 40/17 41/3 42/1 42/3 49/11 49/12 50/5 50/7 51/9 51/18 51/20 56/2 58/13 58/15 59/11 60/9 62/12 63/9 63/12 63/15 63/22 69/22 70/7 71/24 75/6 79/10 82/5 82/6 84/22 85/1 86/15 86/21 87/17 87/23 90/6 97/2 97/6 97/9 97/11 98/4 98/6 99/18 107/22 108/6 111/16 114/11 114/21 120/10 122/23 125/22 can't [17] 16/13 52/7 54/16 55/11 61/8 73/25 82/6 88/5 98/2 98/7 98/11 99/24 102/24 104/5 105/23 115/14 123/23 cancels [1] 64/17 cannot [1] 34/23 cap [2] 36/8 36/21 capability [1] 89/12 capacity [1] 95/24 carefully [1] 122/15 carried [1] 84/23 carry [2] 95/4 120/24 Cartwright [2] 41/5 85/20 case [91] 2/5 4/12 7/10 7/18 13/21 15/8 15/25 16/20 19/6 19/6 20/2 24/23 25/4 25/5 25/7 25/15 25/17 25/19 25/20 26/12 26/13 26/23 28/3 28/7 29/21 30/9 31/7 31/11 31/11 31/14 31/21 32/2 32/9 32/16 32/19 38/1 38/8 39/19 39/21 40/7 40/11 40/21 58/4 78/1 80/4 82/24 83/20 84/9 84/17 85/18 85/23 86/7 87/18 87/25 91/17 92/9 92/11 92/12 93/12	103/16 127/9 94/25 95/12 95/14 95/19 96/11 97/19 97/21 97/25 98/4 98/8 99/21 100/9 101/5 101/10 101/16 101/22 101/25 102/7 102/11 102/19 104/21 106/14 107/18 108/12 109/10 110/3 110/8 110/13 111/9 116/22 120/1 120/13 case-specific [2] 92/9 92/11 cases [21] 29/17 29/25 41/23 41/23 48/2 51/24 52/3 52/6 52/18 52/21 70/19 83/3 87/24 90/14 90/20 95/16 96/10 96/21 97/7 97/22 109/16 cash [6] 31/3 43/9 64/15 108/10 112/20 112/24 Castleton [27] 31/21 32/2 32/9 32/16 33/16 35/1 37/3 39/2 39/4 39/7 39/11 92/12 93/12 93/14 93/16 94/4 94/10 94/22 95/11 99/21 101/1 105/3 105/7 105/20 106/14 107/5 120/1 Castleton's [4] 33/24 34/3 38/1 100/15 category [1] 80/3 catered [1] 112/22 cause [2] 54/17 70/16 caused [1] 19/25 causing [1] 113/8 centrality [1] 11/21 centrally [1] 112/25 centre [3] 9/13 41/7 41/12 certain [3] 3/16 64/11 126/22 certainly [10] 4/4 13/16 27/23 29/7 44/15 66/23 75/8 88/9 111/9 114/4 cetera [1] 62/23 chain [12] 1/10 1/24 2/8 5/24 10/14 13/22 16/12 22/17 105/22 105/24 109/3 120/18 chains [1] 92/23 Chair [2] 8/11 125/10 Chair's [1] 100/4 Chairman [1] 2/9 challenge [1] 96/1 challenged [3] 56/20 95/20 96/12 challenges [2] 43/24
----------	---	--	---	--

C	122/3 Cleveleys [6] 97/19 97/21 97/25 98/4 98/8 115/1 client [7] 5/21 8/4 48/14 102/1 111/11 111/14 115/12 clients [15] 14/15 25/12 30/25 107/25 108/2 108/3 108/3 108/4 111/1 111/2 111/4 111/7 114/14 114/18 114/20 close [3] 2/10 21/1 118/23 closure [1] 2/11 Co [1] 57/8 Cockett [3] 100/22 104/18 106/24 cogent [1] 55/19 cohesion [1] 22/12 Cole [3] 38/20 100/22 104/18 collate [11] 13/6 18/25 19/10 21/6 22/24 56/17 56/23 69/8 69/10 75/11 77/8 collated [6] 21/10 23/14 52/9 53/14 56/8 56/15 collating [2] 13/17 28/12 collation [2] 7/10 61/16 collator [1] 23/18 colleague [2] 47/2 47/3 colleague's [1] 78/6 colleagues [6] 10/9 11/1 55/15 58/2 114/5 117/2 collective [2] 103/10 103/12 colour [1] 54/11 column [1] 41/18 come [26] 6/22 7/6 14/22 16/8 28/17 36/25 40/14 53/16 55/24 56/2 71/21 75/5 75/24 79/21 79/24 82/5 86/15 88/1 88/21 92/22 106/3 111/16 113/1 114/11 117/10 123/18 comes [4] 45/8 85/3 85/6 93/4 comfortably [1] 48/25 coming [28] 2/20 2/23 2/24 7/9 10/20 11/25 13/8 13/11 14/12 23/11 43/5 45/3 46/14 46/21 48/4 56/22 58/3 73/16	80/13 80/18 81/1 86/3 86/5 89/8 111/5 111/24 115/6 126/15 commenced [1] 32/2 comment [3] 22/20 23/4 39/14 commentary [1] 79/17 comments [4] 39/6 78/9 110/1 114/25 commerce [1] 30/24 commercial [6] 31/8 31/12 44/18 48/12 50/10 111/8 commercially [1] 30/22 committed [1] 81/19 Committee [1] 116/16 common [5] 48/11 89/22 89/23 89/24 101/21 comms [4] 51/23 107/22 108/12 108/14 communicated [5] 96/8 121/9 121/12 123/7 123/9 communicating [1] 108/21 Communication [1] 41/10 communications [1] 49/24 community [2] 22/9 118/14 companies [1] 114/15 company [3] 12/17 24/3 68/9 compared [1] 91/7 compilation [4] 2/16 20/3 23/19 61/23 compile [1] 14/7 compiled [3] 84/9 84/18 86/8 complaining [1] 43/22 complaints [6] 46/12 94/15 96/25 97/16 99/8 108/25 completely [2] 107/4 109/5 completion [1] 64/17 complex [1] 112/16 Compliance [4] 85/8 85/14 85/20 86/2 comprehensive [1] 14/8 compromise [2] 34/3 100/15 compromised [2] 96/3 96/4 computer [4] 13/14 27/19 96/19 99/1	conceal [1] 119/4 concealing [1] 119/11 concept [5] 28/18 53/17 67/14 79/3 88/10 concern [7] 11/18 11/23 33/19 115/11 115/16 115/19 122/20 concerned [16] 9/10 9/12 10/6 29/13 29/16 51/16 52/5 52/14 52/15 53/10 79/1 108/14 114/18 114/19 116/22 124/22 concerning [3] 2/8 27/7 56/6 concerns [8] 11/21 47/7 51/22 52/1 112/1 112/3 113/13 120/25 conclusion [1] 107/21 conditions [1] 2/4 conduct [8] 31/14 33/9 36/13 78/22 83/19 100/10 101/6 101/9 conducted [2] 80/15 82/8 confidence [2] 30/23 70/17 confident [1] 31/5 confirm [1] 33/6 confirmed [1] 111/13 confirming [1] 37/8 conflated [1] 19/20 confusion [1] 47/1 consciously [1] 74/24 consent [1] 37/6 consequence [1] 65/20 consider [2] 68/10 123/8 considerable [1] 26/19 considerably [1] 116/1 consideration [1] 36/12 consistent [3] 14/8 46/17 52/16 constantly [2] 5/4 81/12 construction [1] 7/11 contact [6] 3/3 4/12 14/9 24/13 72/12 75/17 contacted [2] 75/9 95/8 contain [1] 14/7 contaminated [1] 80/9 contaminating [1]	79/25 contended [1] 107/6 content [6] 41/19 78/25 91/17 92/10 92/12 109/4 context [9] 5/17 33/14 67/24 80/17 104/25 115/5 115/17 117/18 117/19 continue [1] 54/10 continued [7] 1/3 1/4 9/5 34/14 113/1 128/2 128/4 continues [1] 64/18 continuing [1] 25/11 contract [1] 96/11 contradict [2] 120/9 125/4 contradictory [1] 74/13 contrary [2] 28/18 113/13 contrary' [1] 105/18 contribute [1] 105/16 control [6] 39/20 68/7 86/4 113/2 113/7 117/23 convene [1] 48/15 convened [3] 45/5 48/10 48/16 conversation [11] 2/18 10/15 12/7 12/10 16/16 16/17 53/23 55/14 55/17 75/7 91/9 conversations [11] 10/17 14/6 16/11 24/20 72/16 86/11 114/4 114/9 116/13 117/13 118/17 convict [1] 27/19 conviction [1] 30/3 convincing [2] 37/16 37/22 coordinated [1] 45/18 copied [5] 6/4 17/12 32/6 104/17 107/2 copies [1] 93/10 copy [1] 18/3 core [1] 53/17 corner [2] 25/25 62/13 corporate [4] 48/14 108/3 108/4 115/11 correct [8] 8/18 51/7 76/11 108/15 120/8 121/18 125/1 125/13 Correcting [1] 62/15 correction [1] 46/2 corrections [3] 33/7 118/19 118/22 correctly [1] 65/16 corresponded [1] 123/15
----------	---	--	--	---

C	29/20 29/25 30/9 41/23 84/10 84/11 84/15 86/9 86/10 106/21 criticism [1] 116/9 crossed [1] 67/21 Crown [3] 26/7 26/8 26/10 CS's [1] 62/13 culmination [1] 85/7 culture [3] 27/6 29/2 29/6 current [6] 32/21 51/14 91/2 97/5 97/7 127/8 currently [3] 62/22 64/13 90/19 customer [1] 43/3 customers [1] 30/25 cut [7] 36/7 76/18 77/10 77/21 77/22 112/18 118/3 cut-off [1] 112/18	106/4 December [1] 32/3 decent [1] 21/7 decide [3] 36/21 85/18 86/6 decided [1] 52/20 decision [44] 12/19 15/23 16/4 16/23 17/4 17/8 36/17 39/12 45/13 45/14 46/15 85/5 85/11 85/13 85/25 86/3 86/18 100/10 101/6 101/9 101/14 101/15 101/18 102/19 103/2 103/9 103/13 103/23 104/9 112/24 121/20 121/24 122/4 122/6 123/11 124/3 124/9 124/14 124/23 124/24 125/21 126/2 126/7 126/10 decision-maker [2] 126/7 126/10 decision-making [1] 85/5 decisions [1] 104/8 declaration [1] 35/9 declare [1] 105/15 deductions [1] 95/9 default [2] 94/3 94/7 defective [1] 35/6 defence [29] 1/15 2/19 3/4 4/7 6/5 7/12 7/17 8/15 8/20 12/20 13/20 14/1 14/10 15/19 16/7 17/6 26/16 26/22 27/5 27/8 33/17 33/22 33/25 82/24 83/1 93/24 107/18 120/22 121/13 defence/counterclaim [1] 33/25 defendant [4] 13/13 13/21 27/8 27/18 defendants [3] 26/24 28/8 97/10 defending [3] 20/16 39/23 107/4 deficiency [1] 26/13 definitely [1] 114/8 degree [1] 26/15 deign [1] 38/11 deigns [1] 27/18 deliver [1] 24/3 Delivery [4] 50/11 50/13 59/5 59/12 delve [1] 116/5 demand [2] 34/23 35/2 demanding [1] 5/11 demonstrate [2] 37/12 37/21 demonstrated [1] 36/3	den [2] 73/21 74/21 department [2] 114/16 117/23 departments [1] 24/18 deploy [1] 17/9 deploying [1] 44/19 deployment [1] 43/2 describe [2] 68/4 94/1 described [6] 13/5 22/10 50/10 59/24 110/16 115/9 describes [1] 94/5 describing [1] 93/11 description [8] 38/15 44/21 45/7 45/22 108/18 109/15 110/4 114/25 designated [1] 85/16 desire [1] 105/20 Desktop [1] 62/23 despite [2] 37/13 63/14 destroy [2] 26/20 27/4 destroyed [1] 27/11 destroying [1] 78/7 detailed [1] 55/2 details [1] 120/25 deter [2] 29/14 29/22 determine [1] 122/8 determined [1] 122/8 detrimental [1] 51/23 developments [1] 17/25 dialogue [2] 11/1 11/22 Dickinson [4] 40/17 40/24 42/3 48/19 did [70] 3/21 5/24 6/12 6/22 10/9 12/16 23/1 23/24 24/10 27/21 29/25 47/8 47/9 54/15 54/17 54/19 55/14 57/21 61/14 66/18 66/23 66/24 68/19 68/22 69/6 69/14 70/1 70/5 72/11 73/2 73/23 74/20 76/20 76/21 76/25 79/11 80/2 80/13 81/5 81/6 83/2 83/6 83/8 83/11 83/13 83/15 83/16 84/2 84/3 91/24 92/3 98/17 102/17 102/18 105/16 108/19 109/20 111/21 112/2 112/6 112/20 117/11 120/21 122/5 122/6 122/16 122/22 124/3 124/12 127/5 didn't [27] 3/24 4/5 4/5 5/23 6/11 7/8 10/5	18/19 25/2 25/6 31/13 50/15 53/12 54/20 67/4 68/3 73/17 76/17 79/24 83/18 97/25 115/25 116/6 117/23 122/24 124/8 125/10 difference [1] 35/24 differences [1] 112/14 different [15] 5/2 11/25 31/2 45/3 45/16 46/6 46/11 46/19 46/20 56/11 77/5 80/3 85/21 104/16 118/11 differently [1] 56/11 difficult [1] 79/2 Dilley [3] 38/25 39/17 104/19 direct [4] 4/6 32/8 45/24 67/8 directly [12] 3/3 13/19 44/7 44/21 45/1 45/22 61/22 121/9 121/12 121/22 123/7 123/9 director [7] 12/17 19/23 22/10 47/19 74/5 86/11 103/3 Directorate [1] 68/7 directors [2] 24/22 24/24 disagreeing [1] 74/1 disappear [1] 64/10 disclosure [5] 8/13 26/16 94/14 94/18 94/23 discourage [1] 40/3 discrepancies [4] 62/16 64/9 70/25 111/4 discrepancy [1] 65/8 discuss [3] 42/10 91/3 120/16 discussed [2] 15/21 91/10 discussing [1] 122/17 discussion [3] 3/18 76/5 103/10 discussions [2] 24/16 118/5 dishonest [1] 35/1 dishonesty [2] 34/20 37/8 dispute [2] 35/20 35/23 disputing [1] 70/20 disrespect [1] 79/22 disrespect to [1] 79/22 dissimilar [1] 42/4 dissuade [4] 26/24 28/8 29/4 30/16 distinction [1]
----------	---	--	---	--

D	87/8 119/25	89/21 91/19 95/14	14/12 15/2 21/5 119/3	exactly [7] 4/1 10/7
distinction... [1]	don't [78] 6/2 6/7	95/19 96/11 97/9	122/21	40/10 52/7 55/10 98/2
126/11	9/25 16/6 16/16 16/16	earlier [9] 4/1 18/25	engage [2] 122/16	119/14
distribution [1] 62/4	21/11 24/24 24/25	18/25 24/9 42/22 54/3	122/22	examination [4] 5/22
diversity [1] 72/6	27/15 27/16 27/24	61/6 69/7 109/4	engagement [1]	8/14 8/15 10/8
Division [2] 28/22	29/6 30/3 32/10 32/16	early [4] 57/13 60/17	68/13	examined [1] 71/2
29/20	38/13 40/11 42/14	66/21 96/10	engaging [1] 4/6	example [8] 42/1
do [70] 2/4 3/8 6/4	44/14 45/5 45/11	earth [1] 21/5	enough [1] 7/25	43/3 44/7 45/19 46/9
8/7 14/15 16/24 19/14	45/12 45/14 47/9	easier [4] 43/19	ensure [6] 33/21 46/8	48/14 109/9 126/6
21/4 21/12 22/1 23/19	47/13 47/19 48/3 48/7	44/17 116/2 116/5	47/11 69/23 83/8	examples [4] 40/18
25/6 25/17 25/20	48/7 48/16 54/19	easy [3] 43/23 43/24	123/12	109/8 109/15 109/22
27/23 29/13 32/9	54/19 55/10 55/22	109/11	entailed [1] 5/1	exceedingly [1]
32/16 39/8 42/24 43/5	59/18 67/4 67/21 72/4	economic [1] 31/3	entered [2] 33/17	112/16
44/13 44/17 47/6 50/3	74/25 76/14 76/22	editorial [1] 39/20	37/4	exchange [1] 15/2
57/13 60/12 60/20	77/1 77/3 77/12 77/19	effect [9] 35/9 39/22	entirely [1] 107/9	exchanges [1] 17/15
66/3 66/10 71/1 73/7	79/14 83/8 83/10	40/8 65/7 78/17 83/17	entry [3] 53/14 53/22	executive [5] 29/1
73/11 73/13 77/2 78/3	83/16 88/22 88/25	83/18 120/23 122/6	66/3	91/20 116/16 117/13
79/5 81/9 83/2 83/6	89/19 90/24 91/9 92/3	effectively [1] 118/25	environment [1]	119/6
83/11 86/6 86/13 87/4	99/3 99/11 99/14	efficiency [4] 42/20	80/18	exercises [1] 88/9
89/5 90/22 91/23 92/7	102/20 102/21 102/23	43/17 48/8 48/18	episode [1] 56/6	existence [1] 78/4
92/23 96/24 98/14	104/5 105/22 110/25	eight [1] 91/5	Equally [1] 45/23	existing [1] 94/12
99/4 99/20 100/1	112/4 113/23 114/2	either [12] 32/21	Ernst [1] 68/10	expand [4] 4/18
100/17 100/18 104/2	114/10 116/3 117/4	41/16 75/1 77/24	error [10] 9/16 9/23	12/22 62/17 83/19
104/6 105/19 107/17	120/6 121/23 122/10	78/13 90/2 108/19	10/1 105/15 106/5	expect [7] 2/15 33/4
107/22 113/23 114/21	124/12 125/3 125/25	115/23 115/25 117/7	109/6 109/11 112/22	45/11 77/3 101/8
119/24 123/20 124/1	126/2	123/9 126/6	116/5 118/22	103/12 122/10
124/10 126/2 126/10	done [17] 4/25 20/3	element [2] 53/18	errors [5] 11/13 97/3	expected [13] 3/2 3/6
126/12	30/21 31/8 31/11	89/11	105/10 105/16 113/21	4/8 47/18 53/3 121/8
document [35] 1/14	36/24 47/12 54/20	else [13] 19/11 29/4	escalate [3] 51/1	121/11 121/21 123/6
7/1 52/22 58/11 58/13	56/11 67/20 70/5 81/8	46/25 46/25 47/4	58/2 69/22	123/18 124/16 125/19
60/9 62/9 63/15 63/18	81/12 122/25 123/3	53/21 88/13 88/16	escalated [1] 103/24	126/13
64/3 64/25 70/7 73/13	123/25 125/20	114/21 115/15 123/10	essence [1] 44/25	expecting [2] 101/13
77/10 84/19 84/22	doors [2] 109/17	124/10 124/12	essentially [2] 66/6	102/9
86/15 86/21 86/24	110/1	email [56] 1/9 1/20	69/2	expended [2] 33/21
87/1 88/5 91/19 92/13	dot [1] 81/14	1/23 2/8 3/10 5/24 6/4	established [2] 42/13	35/19
98/15 99/18 100/18	double [3] 53/14	6/9 7/22 12/6 15/10	48/6	expenditure [1]
106/13 109/14 110/17	53/22 66/3	16/1 16/4 16/14 17/11	et [1] 62/23	96/13
110/20 111/16 114/2	doubt [5] 26/21 28/10	17/15 18/21 18/22	Evans [1] 107/2	experience [5] 68/13
114/4 114/11 124/22	50/24 57/16 114/13	25/22 25/23 27/1	even [6] 28/1 29/1	89/11 92/4 98/12
documentation [2]	Doug [1] 107/2	27/22 28/22 31/17	40/4 76/25 103/25	110/5
9/17 11/13	down [27] 1/23 2/10	38/20 50/9 53/25 73/8	103/25	experienced [1] 48/1
documents [19]	6/25 8/12 31/6 33/13	73/12 74/14 74/21	event [1] 50/17	experiencing [3]
10/13 40/15 49/23	35/11 40/14 41/9 42/7	76/9 76/15 76/18	events [6] 10/14	113/11 116/18 116/19
54/24 56/1 60/17	56/2 65/20 80/19 82/5	76/19 76/22 77/7	13/22 21/25 22/15	expert [8] 11/12
74/13 77/5 78/7 94/18	85/1 86/15 86/25	77/24 78/4 87/4 87/13	22/17 67/18	12/20 91/25 92/1 92/5
94/20 98/6 98/9 98/13	92/22 94/7 94/25 95/4	90/7 92/23 98/17	eventually [1] 79/9	92/6 120/14 120/20
99/23 99/25 106/10	97/2 99/18 103/21	99/16 99/20 102/8	ever [2] 78/6 81/24	expertise [2] 26/19
120/6 126/23	109/5 111/16 114/11	104/13 106/18 107/16	every [3] 14/15 26/22	60/1
does [20] 13/13	DPA [2] 85/16 85/17	120/17 120/23 122/7	97/10	explain [4] 97/8 97/9
29/11 35/7 37/24 40/1	draft [1] 91/13	122/11 122/24 124/2	everyone [2] 26/17	107/11 126/9
52/18 52/20 55/24	drafted [1] 90/20	emails [6] 17/22 67/7	107/16	explained [6] 14/17
65/1 66/14 67/25 89/1	drawing [1] 126/11	77/1 77/12 114/9	everyone's [1] 100/2	60/14 64/22 69/7
91/19 92/6 101/8	Drive [4] 34/15 93/15	120/2	everything [3] 42/16	72/10 97/11
105/19 108/11 109/18	101/2 105/8	emerges [1] 120/17	115/5 123/22	explaining [2] 85/4
127/14 127/16	driven [1] 30/8	Emma [1] 59/7	everything's [1] 69/4	126/19
doesn't [11] 13/16	drivers [1] 30/13	emphasised [1]	evidence [10] 52/24	explains [1] 64/5
14/18 38/2 44/9 54/11	dropped [1] 12/3	36/17	73/3 73/4 78/20 86/16	explanation [1] 71/25
65/9 66/12 66/15 83/9	due [4] 17/19 105/12	employed [1] 34/17	93/19 94/11 95/17	explicitly [1] 3/7
88/17 123/21	127/6 127/7	enabling [1] 84/6	110/13 122/12	explore [1] 41/19
doing [14] 5/15 8/25	during [5] 84/5 89/21	end [12] 5/8 22/4	evident [1] 51/8	express [1] 29/20
16/9 25/6 25/9 25/17	94/19 108/22 118/23	23/2 43/19 56/3 64/12	evidential [1] 29/16	expressed [2] 122/20
25/19 42/23 43/16	E	69/19 97/9 97/9	evidently [3] 18/13	125/4
46/20 47/15 82/21	each [8] 41/18 54/12	111/14 111/15 127/14	55/1 122/20	expressing [1]
		ended [7] 2/1 13/12	evolves [1] 44/10	122/25

E	feels [2] 45/4 77/6	5/20 16/10	22/11 125/18	63/8 63/11 64/5 64/23
extent [1] 122/17	fees [1] 36/25	following [4] 60/18	fundamentally [1]	64/24 70/7 76/25
external [2] 18/5	Felstead [1] 80/22	104/14 108/12 120/21	12/2	80/19 81/15 85/1 93/1
93/17	Felstead's [1] 82/24	follows [2] 34/9	further [11] 6/25	94/7 94/25 102/17
extracting [1] 96/9	felt [10] 2/20 55/16	64/10	39/24 41/15 65/20	102/18 109/16 124/6
eyes [1] 21/21	55/17 72/16 80/6	foot [6] 6/8 7/23 20/8	71/7 108/17 119/22	124/17
	83/25 84/14 114/24	25/22 31/16 54/5	120/4 121/2 127/6	goes [9] 41/21 79/2
	114/24 115/3	forgetting [1] 97/24	127/7	85/8 85/13 93/4 94/1
F	few [6] 17/13 17/14	forgive [2] 78/20	future [6] 51/23	96/6 104/15 107/11
faced [1] 107/19	66/20 75/9 75/14	97/12	70/25 96/3 100/10	going [38] 3/18 4/17
facilitate [5] 4/10 5/7	104/24	forgotten [1] 13/4	101/6 117/10	5/1 19/12 20/18 23/20
7/13 121/2 124/9	fifth [1] 70/22	form [3] 10/7 76/16		25/15 29/17 30/12
facilitated [2] 124/5	124/25	90/23	G	31/3 31/20 33/14
124/25	figures [1] 20/15	formally [2] 105/17	gain [1] 65/24	40/19 41/19 43/8
facing [1] 14/1	file [5] 85/15 85/18	123/15	Gareth [8] 26/19 53/8	43/20 45/15 47/19
fact [12] 12/16 32/8	85/23 113/21 113/22	format [2] 76/17 92/1	53/24 54/6 54/9 55/14	47/20 48/25 49/14
34/4 63/1 63/14 65/23	filed [1] 94/3	formatted [1] 25/25	55/18 60/7	49/15 51/6 52/25
67/2 83/1 100/21	files [2] 84/17 114/6	former [5] 15/11	Gareth's [1] 55/11	57/10 58/11 73/15
106/8 113/14 124/3	final [5] 12/13 39/13	32/21 93/14 94/12	gather [4] 4/9 13/18	75/9 79/19 82/23
factors [1] 36/11	85/13 85/25 86/18	105/7	47/12 61/25	86/25 88/8 90/2 95/20
factual [1] 125/13	finally [1] 122/5	forum [2] 46/11	gathering [3] 14/3	100/3 101/17 124/6
failed [1] 1/11	finance [8] 22/3	46/16	16/20 89/6	125/9
failure [1] 68/17	22/10 22/23 23/9	forward [4] 17/10	gave [5] 8/12 8/19	gone [5] 39/4 40/19
failures [1] 109/12	25/12 60/3 68/7 68/11	23/4 58/6 82/25	12/18 69/1 91/23	67/19 81/8 81/13
fair [7] 38/14 57/24	Financial [1] 41/7	forwarded [2] 1/21	gearing [3] 4/23	good [7] 1/5 1/8 24/2
60/1 71/22 103/22	find [11] 3/13 5/23	85/15	25/13 67/15	62/4 100/8 101/4
123/7 125/6	66/7 77/2 80/20 82/1	found [3] 26/11 79/23	general [6] 26/13	108/8
fairer [1] 103/9	84/22 106/7 109/17	109/25	38/1 55/13 56/3 69/3	goods [1] 24/3
faith [1] 23/19	116/6 119/13	four [6] 10/22 11/10	96/21	got [55] 3/12 4/24
fall [1] 80/2	finding [1] 115/22	31/20 38/6 110/21	generally [1] 114/13	4/25 16/10 21/7 21/13
fallen [1] 44/21	findings [1] 110/15	117/10	genesis [2] 42/15	21/16 21/25 22/19
familiar [1] 14/19	fine [8] 49/3 49/6	four years [1] 31/20	45/8	25/2 30/23 31/1 32/9
far [4] 61/14 93/12	66/13 69/4 121/16	fourth [2] 70/18	genuine [2] 107/6	32/16 32/17 40/3
122/23 124/21	127/1 127/13 127/18	100/13	110/10	45/23 46/10 46/17
fate [1] 13/13	finish [2] 49/1 100/4	franchises [1]	genuinely [3] 16/16	47/14 48/13 51/13
fault [1] 82/9	firm [2] 57/7 75/12	115/21	102/24 104/4	52/17 53/7 53/10
favour [2] 35/20	firms [2] 96/19 99/1	frankly [1] 21/9	get [18] 24/5 29/2	54/23 55/1 55/2 56/4
35/23	first [17] 2/22 4/16	Fraser [1] 110/11	34/13 39/15 43/4	56/10 58/3 60/10
February [10] 39/5	7/23 12/5 22/7 36/7	fraud [3] 43/3 84/2	43/20 44/8 47/15	60/10 63/2 63/5 63/13
49/21 51/9 51/25 61/3	43/20 57/2 60/21	84/3	51/18 54/21 55/9 61/3	67/13 68/20 72/15
61/5 61/7 61/8 66/23	63/23 65/21 69/10	free [1] 120/9	62/21 65/13 70/6	81/17 87/22 91/5
69/12	69/18 70/10 92/14	Friday [4] 1/1 17/19	87/25 118/11 118/20	105/25 106/9 106/11
February 2007 [1]	100/25 106/18	33/24 34/5	gets [2] 31/6 55/4	111/12 118/3 118/7
39/5	firstly [4] 4/18 8/14	front [4] 20/8 22/4	getting [2] 118/16	118/8 120/10 121/5
February 2010 [1]	34/22 51/25	43/18 107/22	119/10	121/15 123/23 125/11
51/9	five [8] 38/6 48/4	frustration [2] 113/8	give [16] 5/21 10/5	125/12
February 2011 [1]	52/9 61/21 62/7 70/22	113/12	18/8 33/14 35/8 56/5	grabbed [1] 30/17
51/25	110/22 111/22	FUJ00081544 [2]	57/22 68/5 71/6 79/21	Graham [1] 107/1
February/March 2011	five years [1] 38/6	50/6 54/1	89/11 91/24 102/1	granted [1] 121/21
[1] 49/21	five-page [1] 110/22	Fujitsu [22] 26/20	102/10 104/25 126/1	Granville [4] 24/10
fed [1] 77/5	fix [1] 47/14	49/24 50/21 55/15	given [18] 3/1 8/23	76/9 76/12 76/15
Federation [2] 117/1	fixed [2] 9/18 37/6	58/17 60/5 60/6 60/7	8/23 13/4 18/23 19/13	Granville's [2] 76/23
117/14	fixing [1] 47/16	60/8 60/11 73/10	19/17 21/25 23/24	77/16
feed [1] 89/7	flag [1] 20/18	74/15 75/1 90/12	31/24 36/1 39/21 40/7	grateful [2] 62/20
feedback [2] 68/20	Flora [1] 72/24	90/23 91/13 93/18	51/14 83/24 88/11	70/9
117/8	Flora Page [1] 72/24	93/23 96/17 96/23	89/6 123/22	gravitas [1] 67/18
feeds [3] 65/2 65/6	flowing [1] 93/25	97/6 99/7	gives [1] 5/16	great [2] 107/15
111/19	focus [4] 83/21 84/5	Fujitsu's [1] 96/5	giving [4] 73/3 80/23	107/21
feel [7] 4/5 5/14 7/8	108/20 119/13	full [5] 35/13 36/2	102/17 105/1	greater [2] 39/21
24/25 76/4 113/11	focused [1] 28/15	37/5 37/11 37/14	gleeful [1] 27/22	40/8
120/9	follow [5] 56/1 99/13	function [1] 90/12	go [32] 1/18 9/9 12/5	ground [2] 90/4
feeling [5] 5/3 38/12	99/15 123/22 123/24	functions [3] 25/14	14/21 17/20 20/7	124/6
38/13 55/21 117/15	follow-back [2]	50/14 72/11	33/12 35/3 38/18 39/9	group [14] 10/19
feelings [1] 16/15	123/22 123/24	fundamental [3] 4/13	45/22 53/1 59/1 62/11	45/4 45/4 45/10 46/15

<p>G</p> <p>group... [9] 47/8 47/10 47/16 48/6 61/20 102/17 103/17 104/16 107/14</p> <p>groups [4] 46/19 47/12 48/10 48/15</p> <p>guidance [1] 2/5</p> <p>guide [1] 46/3</p> <p>Guildford [2] 26/8 26/10</p> <p>Guilty [1] 26/11</p>	<p>99/10 99/14 102/25 104/3 122/14 122/16 124/15 124/18 124/19</p> <p>happening [3] 43/1 53/3 63/11</p> <p>happens [3] 38/10 65/19 124/20</p> <p>happy [9] 1/25 4/16 4/21 5/12 5/18 5/19 13/11 16/2 99/24</p> <p>hard [2] 26/17 79/23</p> <p>hardly [1] 53/21</p> <p>has [36] 2/1 7/5 12/13 15/22 28/22 34/7 35/8 36/13 36/16 38/25 39/4 39/7 39/11 39/17 42/20 51/15 52/17 52/21 53/8 60/9 65/22 76/1 77/4 81/9 81/13 91/4 92/25 93/12 97/13 102/1 107/9 112/21 112/23 119/3 124/5 124/23</p> <p>hasn't [2] 28/24 124/19</p> <p>have [257]</p> <p>haven't [15] 75/20 76/7 76/11 76/12 78/19 78/24 106/6 106/9 109/8 111/17 112/2 113/18 123/19 123/25 126/24</p> <p>having [24] 10/25 18/15 19/22 20/2 20/17 25/5 30/8 37/10 37/19 40/19 46/20 55/16 72/17 76/5 76/18 79/7 111/24 113/9 113/21 114/7 116/13 117/6 117/13 118/17</p> <p>hawk [1] 40/2</p> <p>he [52] 2/1 2/9 2/9 3/21 3/22 3/22 3/23 3/25 6/11 7/23 8/18 15/22 19/1 24/10 24/13 24/15 24/16 24/19 28/24 33/17 35/2 35/9 35/14 35/14 37/5 50/11 50/15 50/15 50/17 50/18 50/23 54/12 55/21 57/20 57/21 59/18 71/17 72/3 72/5 72/5 72/9 72/16 72/19 90/17 104/23 105/6 107/6 107/7 113/11 113/11 120/10 126/9</p> <p>he'd [1] 72/17</p> <p>he's [1] 105/1</p> <p>head [15] 1/25 54/22 54/25 55/9 68/6 79/5 84/12 85/8 85/14 85/25 86/4 86/18 93/6</p>	<p>106/21 106/25</p> <p>headcount [2] 88/8 88/12</p> <p>headed [1] 40/25</p> <p>heading [1] 64/4</p> <p>headings [1] 91/5</p> <p>health [3] 12/19 57/23 69/1</p> <p>hear [5] 1/5 49/11 79/9 79/11 114/15</p> <p>heard [4] 79/11 100/11 101/20 123/19</p> <p>hearing [4] 3/20 32/2 94/6 127/23</p> <p>hearings [1] 74/20</p> <p>heart [1] 22/8</p> <p>Helen [2] 106/11 109/10</p> <p>Helen's [1] 109/23</p> <p>help [7] 60/20 62/19 63/9 63/13 75/11 89/12 90/3</p> <p>helped [1] 80/16</p> <p>helpful [2] 62/25 126/12</p> <p>helpfully [3] 10/25 13/2 59/24</p> <p>helping [3] 43/9 52/25 91/12</p> <p>helps [2] 31/23 45/7</p> <p>her [13] 7/1 27/9 27/20 73/23 74/4 74/5 75/20 77/14 77/23 99/6 101/3 102/10 102/17</p> <p>here [42] 2/14 3/19 11/18 11/23 13/23 18/14 18/22 22/1 22/16 22/17 25/2 25/3 27/24 30/12 30/13 31/20 33/14 39/25 44/22 53/8 53/11 53/18 55/1 60/24 63/14 75/5 79/7 79/21 79/24 93/1 94/5 107/18 107/21 107/23 110/25 113/16 113/23 116/9 116/22 117/20 119/3 125/4</p> <p>here's [3] 44/11 55/3 55/4</p> <p>Hi [1] 15/17</p> <p>High [1] 32/2</p> <p>highlight [1] 62/18</p> <p>him [12] 3/25 35/5 35/12 37/4 37/11 37/15 72/10 121/11 121/12 123/3 123/18 126/15</p> <p>himself [1] 2/8</p> <p>hindsight [3] 56/20 61/17 68/2</p> <p>his [15] 12/7 24/12 24/14 28/22 35/10</p>	<p>37/13 39/6 54/12 54/15 59/19 59/25 80/8 87/10 90/9 95/7</p> <p>history [1] 79/5</p> <p>hitting [1] 90/4</p> <p>Hobbs [6] 73/9 74/15 74/21 76/15 76/19 77/20</p> <p>hoc [1] 14/4</p> <p>Hogg [3] 1/16 18/11 120/22</p> <p>Hogg's [1] 6/24</p> <p>hold [2] 6/8 96/24</p> <p>holiday [3] 61/2 67/12 69/12</p> <p>home [3] 81/24 81/24 81/25</p> <p>honestly [1] 55/11</p> <p>hope [8] 5/16 28/14 29/21 31/10 31/10 31/13 45/6 100/2</p> <p>hoped [2] 26/23 28/7</p> <p>Horizon [82] 8/25 9/2 9/8 9/24 10/3 11/20 12/18 18/1 18/3 18/8 18/16 18/18 18/20 19/3 20/17 20/19 21/3 21/14 23/10 24/1 26/9 26/14 26/25 27/2 27/3 27/7 27/10 28/2 28/9 28/13 28/15 28/19 29/5 29/23 33/20 35/10 37/14 40/25 42/11 44/3 44/12 44/22 47/3 47/17 49/22 51/15 57/22 64/9 64/14 65/8 69/4 70/17 70/21 70/25 74/7 83/5 93/17 93/20 94/13 94/16 94/23 95/2 95/16 95/19 96/2 96/9 96/12 96/21 97/1 97/8 97/17 98/19 99/9 105/13 105/16 107/8 107/9 108/7 109/1 112/12 112/14 112/21</p> <p>Horizon's [1] 30/15</p> <p>Horizon/POLFS [1] 112/14</p> <p>horrible [2] 13/23 119/2</p> <p>horrified [1] 22/14</p> <p>how [30] 2/5 7/18 11/24 13/14 21/4 43/23 43/24 44/16 44/18 45/7 51/23 52/1 53/9 53/18 61/13 68/14 69/14 80/15 81/19 81/21 82/18 94/1 94/5 94/25 102/17 102/18 102/23 106/3 118/10 119/3</p> <p>how's [1] 55/6</p> <p>Howe [1] 57/8</p>	<p>however [8] 18/23 36/10 36/16 37/2 38/3 51/14 53/4 109/21</p> <p>Hulbert [3] 50/24 88/4 88/24</p> <p>human [5] 78/20 78/24 80/3 105/15 106/5</p> <p>humbled [1] 22/13</p>
H				
<p>had [86] 1/16 1/16 2/7 2/8 6/18 7/6 9/18 9/25 10/14 10/15 10/17 10/18 10/24 15/18 15/19 15/20 15/23 16/3 16/8 16/17 16/24 19/13 19/16 20/14 21/7 21/13 22/10 23/1 24/13 24/16 24/20 25/15 31/1 32/8 32/11 32/22 33/3 33/8 43/14 45/23 51/13 52/1 54/18 56/12 62/4 62/6 67/5 69/15 71/15 71/17 72/12 72/15 72/17 73/6 75/18 77/7 77/22 79/8 81/7 81/19 81/22 81/23 82/25 84/12 86/10 88/25 89/25 92/4 93/21 93/22 94/22 98/15 104/25 105/12 106/3 107/17 108/8 108/21 114/4 114/8 115/11 116/21 117/21 118/2 118/3 118/5</p> <p>hadn't [3] 5/7 55/8 124/15</p> <p>half [2] 61/6 127/4</p> <p>hand [10] 7/15 25/25 41/17 58/15 58/17 62/13 74/14 74/16 96/22 123/4</p> <p>handled [1] 7/19</p> <p>hands [1] 30/18</p> <p>handwriting [2] 87/12 99/12</p> <p>handwritten [1] 87/16</p> <p>happen [6] 10/10 16/19 16/22 17/7 81/11 124/14</p> <p>happened [27] 13/23 16/11 20/6 22/15 22/17 51/5 51/8 51/12 51/18 53/8 67/25 75/12 76/3 81/10 93/12 98/2 98/24 99/6</p>	<p>12/13 15/22 28/22 34/7 35/8 36/13 36/16 38/25 39/4 39/7 39/11 39/17 42/20 51/15 52/17 52/21 53/8 60/9 65/22 76/1 77/4 81/9 81/13 91/4 92/25 93/12 97/13 102/1 107/9 112/21 112/23 119/3 124/5 124/23</p> <p>hasn't [2] 28/24 124/19</p> <p>have [257]</p> <p>haven't [15] 75/20 76/7 76/11 76/12 78/19 78/24 106/6 106/9 109/8 111/17 112/2 113/18 123/19 123/25 126/24</p> <p>having [24] 10/25 18/15 19/22 20/2 20/17 25/5 30/8 37/10 37/19 40/19 46/20 55/16 72/17 76/5 76/18 79/7 111/24 113/9 113/21 114/7 116/13 117/6 117/13 118/17</p> <p>hawk [1] 40/2</p> <p>he [52] 2/1 2/9 2/9 3/21 3/22 3/22 3/23 3/25 6/11 7/23 8/18 15/22 19/1 24/10 24/13 24/15 24/16 24/19 28/24 33/17 35/2 35/9 35/14 35/14 37/5 50/11 50/15 50/15 50/17 50/18 50/23 54/12 55/21 57/20 57/21 59/18 71/17 72/3 72/5 72/5 72/9 72/16 72/19 90/17 104/23 105/6 107/6 107/7 113/11 113/11 120/10 126/9</p> <p>he'd [1] 72/17</p> <p>he's [1] 105/1</p> <p>head [15] 1/25 54/22 54/25 55/9 68/6 79/5 84/12 85/8 85/14 85/25 86/4 86/18 93/6</p>	<p>106/21 106/25</p> <p>headcount [2] 88/8 88/12</p> <p>headed [1] 40/25</p> <p>heading [1] 64/4</p> <p>headings [1] 91/5</p> <p>health [3] 12/19 57/23 69/1</p> <p>hear [5] 1/5 49/11 79/9 79/11 114/15</p> <p>heard [4] 79/11 100/11 101/20 123/19</p> <p>hearing [4] 3/20 32/2 94/6 127/23</p> <p>hearings [1] 74/20</p> <p>heart [1] 22/8</p> <p>Helen [2] 106/11 109/10</p> <p>Helen's [1] 109/23</p> <p>help [7] 60/20 62/19 63/9 63/13 75/11 89/12 90/3</p> <p>helped [1] 80/16</p> <p>helpful [2] 62/25 126/12</p> <p>helpfully [3] 10/25 13/2 59/24</p> <p>helping [3] 43/9 52/25 91/12</p> <p>helps [2] 31/23 45/7</p> <p>her [13] 7/1 27/9 27/20 73/23 74/4 74/5 75/20 77/14 77/23 99/6 101/3 102/10 102/17</p> <p>here [42] 2/14 3/19 11/18 11/23 13/23 18/14 18/22 22/1 22/16 22/17 25/2 25/3 27/24 30/12 30/13 31/20 33/14 39/25 44/22 53/8 53/11 53/18 55/1 60/24 63/14 75/5 79/7 79/21 79/24 93/1 94/5 107/18 107/21 107/23 110/25 113/16 113/23 116/9 116/22 117/20 119/3 125/4</p> <p>here's [3] 44/11 55/3 55/4</p> <p>Hi [1] 15/17</p> <p>High [1] 32/2</p> <p>highlight [1] 62/18</p> <p>him [12] 3/25 35/5 35/12 37/4 37/11 37/15 72/10 121/11 121/12 123/3 123/18 126/15</p> <p>himself [1] 2/8</p> <p>hindsight [3] 56/20 61/17 68/2</p> <p>his [15] 12/7 24/12 24/14 28/22 35/10</p>	<p>37/13 39/6 54/12 54/15 59/19 59/25 80/8 87/10 90/9 95/7</p> <p>history [1] 79/5</p> <p>hitting [1] 90/4</p> <p>Hobbs [6] 73/9 74/15 74/21 76/15 76/19 77/20</p> <p>hoc [1] 14/4</p> <p>Hogg [3] 1/16 18/11 120/22</p> <p>Hogg's [1] 6/24</p> <p>hold [2] 6/8 96/24</p> <p>holiday [3] 61/2 67/12 69/12</p> <p>home [3] 81/24 81/24 81/25</p> <p>honestly [1] 55/11</p> <p>hope [8] 5/16 28/14 29/21 31/10 31/10 31/13 45/6 100/2</p> <p>hoped [2] 26/23 28/7</p> <p>Horizon [82] 8/25 9/2 9/8 9/24 10/3 11/20 12/18 18/1 18/3 18/8 18/16 18/18 18/20 19/3 20/17 20/19 21/3 21/14 23/10 24/1 26/9 26/14 26/25 27/2 27/3 27/7 27/10 28/2 28/9 28/13 28/15 28/19 29/5 29/23 33/20 35/10 37/14 40/25 42/11 44/3 44/12 44/22 47/3 47/17 49/22 51/15 57/22 64/9 64/14 65/8 69/4 70/17 70/21 70/25 74/7 83/5 93/17 93/20 94/13 94/16 94/23 95/2 95/16 95/19 96/2 96/9 96/12 96/21 97/1 97/8 97/17 98/19 99/9 105/13 105/16 107/8 107/9 108/7 109/1 112/12 112/14 112/21</p> <p>Horizon's [1] 30/15</p> <p>Horizon/POLFS [1] 112/14</p> <p>horrible [2] 13/23 119/2</p> <p>horrified [1] 22/14</p> <p>how [30] 2/5 7/18 11/24 13/14 21/4 43/23 43/24 44/16 44/18 45/7 51/23 52/1 53/9 53/18 61/13 68/14 69/14 80/15 81/19 81/21 82/18 94/1 94/5 94/25 102/17 102/18 102/23 106/3 118/10 119/3</p> <p>how's [1] 55/6</p> <p>Howe [1] 57/8</p>	<p>I accept [1] 104/9</p> <p>I acknowledge [1] 115/5</p> <p>I agree [3] 71/4 113/17 126/25</p> <p>I also [1] 24/25</p> <p>I am [7] 14/19 77/9 79/6 90/24 97/18 105/23 108/10</p> <p>I and [2] 72/10 114/17</p> <p>I appreciate [1] 67/17</p> <p>I are [1] 126/17</p> <p>I ask [2] 51/18 56/25</p> <p>I asked [3] 2/12 20/23 71/23</p> <p>I assume [1] 18/4</p> <p>I became [1] 60/23</p> <p>I believe [1] 4/19</p> <p>I believed [2] 115/8 116/11</p> <p>I can [2] 75/6 98/6</p> <p>I can't [7] 16/13 52/7 88/5 98/7 104/5 105/23 123/23</p> <p>I certainly [5] 4/4 27/23 66/23 75/8 114/4</p> <p>I collated [1] 53/14</p> <p>I correct [1] 121/18</p> <p>I couldn't [1] 110/19</p> <p>I declare [1] 105/15</p> <p>I did [8] 55/14 76/21 80/13 83/8 83/11 92/3 111/21 112/6</p> <p>I didn't [5] 25/2 25/6 54/20 67/4 68/3</p> <p>I do [5] 21/4 73/13 77/2 98/14 100/18</p> <p>I don't [33] 6/7 9/25 16/6 16/16 24/24 27/16 27/24 29/6 32/16 38/13 45/12 47/19 48/3 54/19 54/19 55/22 67/4 72/4 74/25 77/1 79/14 83/8 88/22 90/24 91/9 99/11 105/22 112/4 114/2 116/3 117/4 120/6 125/3</p> <p>I done [1] 81/12</p> <p>I evidently [1] 122/20</p>

I	I referred [1] 117/9	I want [2] 79/20	102/22 104/4 104/4	124/12 124/15 127/7
I expect [1] 103/12	I reissued [1] 54/20	120/7	105/22 116/17 116/18	imagine [2] 33/8
I feel [1] 76/4	I remember [5] 59/8	I wanted [1] 4/18	117/5 119/3 122/14	48/17
I felt [4] 2/20 55/16	59/21 73/13 79/5	I was [52] 2/25 4/2	124/6 125/8 126/11	immediately [1]
55/17 84/14	79/10	4/3 5/3 5/8 6/4 13/5	126/22	71/20
I find [1] 3/13	I represent [1] 57/6	13/9 16/18 20/20	I've [48] 4/24 4/25	immense [1] 113/8
I got [3] 53/7 68/20	I said [1] 4/17	20/24 21/2 21/20 22/1	8/23 11/17 12/24	impact [9] 18/1 52/18
87/22	I saw [2] 61/6 99/25	22/5 22/5 22/13 22/18	14/17 19/15 20/11	65/20 70/9 70/19
I had [10] 2/7 15/18	I say [3] 10/16 25/18	28/15 48/9 53/23	21/22 24/9 45/19 52/8	78/20 78/24 80/3
16/17 16/24 21/7	92/8	54/22 55/12 55/16	52/24 53/10 54/23	111/18
25/15 32/11 69/15	I shared [3] 61/15	61/2 67/12 67/13	54/24 55/1 56/8 56/9	impacting [1] 64/13
72/15 118/5	61/19 61/21	67/15 67/22 69/12	56/10 56/13 66/22	impartial [1] 82/10
I hadn't [1] 55/8	I should [2] 7/16	73/15 75/13 79/19	69/7 69/19 69/20 73/5	impeccable [1] 36/14
I have [16] 15/22	114/10	81/11 81/13 83/24	74/24 75/1 75/2 75/18	implication [1] 71/14
16/10 39/19 54/21	I sometimes [1]	84/11 84/13 86/4	79/7 79/10 79/13	implications [1]
54/25 66/19 68/1	48/10	97/18 98/20 99/23	79/15 81/17 106/11	51/20
69/16 75/9 76/3 78/8	I speak [1] 91/2	101/17 105/11 113/5	109/14 110/20 113/6	importance [3] 3/1
80/11 80/16 92/13	I spoke [1] 61/24	116/25 117/13 118/13	113/16 113/16 114/9	36/14 118/16
101/4 104/24	I suppose [1] 11/23	118/24 119/4 119/5	118/8 120/10 121/15	important [5] 5/6
I haven't [8] 76/7	I think [115] 2/5 3/11	119/11	125/4 125/12 125/15	23/5 25/8 77/10 80/14
76/12 78/24 106/6	3/20 3/22 3/22 4/16	I wasn't [8] 4/21 5/12	I, [1] 69/7	impose [1] 2/4
106/9 113/18 123/19	4/21 6/13 6/24 7/1 7/3	25/6 25/9 25/16 28/14	I, as [1] 69/7	impression [1] 122/3
126/24	9/23 9/24 10/2 10/11	78/10 91/14	Ian [1] 59/24	improvement [4]
I hear [1] 79/11	10/22 10/23 12/22	I went [1] 118/2	idea [6] 5/12 8/25	4/24 5/10 47/5 68/14
I help [1] 75/11	12/23 13/1 13/4 13/7	I won't [1] 100/2	16/10 88/17 91/7	improvements [1]
I hope [3] 5/16 45/6	13/16 13/20 14/17	I wonder [1] 48/24	106/1	46/13
100/2	16/6 19/24 20/10	I would [46] 2/25 3/2	identified [6] 41/15	inadvertently [2]
I imagine [2] 33/8	20/20 20/23 21/7	3/5 3/9 4/7 5/15 16/9	41/17 46/13 109/22	44/2 52/23
48/17	21/17 22/18 23/4 23/7	16/23 17/3 19/11	111/4 112/12	inappropriate [2]
I inherited [1] 119/8	24/14 24/17 24/19	19/15 19/16 19/24	identify [6] 82/20	30/10 76/5
I joined [1] 22/6	27/12 28/3 29/15	28/14 30/7 30/7 31/10	95/23 96/23 97/5 99/7	inappropriately [1]
I just [6] 31/23 78/23	32/12 37/3 42/17	31/13 33/4 38/4 45/11	123/10	27/22
80/12 87/12 116/8	42/19 43/15 44/14	47/17 48/14 48/17	identifying [3] 96/14	inbox [4] 76/24 76/25
119/21	44/15 45/9 45/15	49/1 52/8 52/13 52/15	96/18 98/25	77/13 77/16
I know [13] 3/22	46/16 46/21 47/10	53/3 56/20 70/6 75/8	IDs [1] 82/19	inception [3] 94/17
23/12 24/12 24/16	47/24 48/3 48/20	77/3 80/18 83/15 92/3	ie [2] 8/15 112/24	97/1 99/10
57/20 72/9 78/25	50/13 50/15 50/21	92/4 99/11 101/12	ie the [1] 8/15	Incidentally [2] 18/4
102/22 107/17 108/16	52/4 52/7 52/10 52/13	109/13 110/3 121/11	ie where [1] 112/24	18/9
108/21 111/21 116/9	52/15 52/19 53/7	121/25 122/10 123/18	if [93] 2/4 5/5 5/13	included [4] 32/23
I left [1] 76/12	53/13 53/17 53/20	124/15	6/8 7/5 9/9 9/24 9/25	33/2 33/11 55/18
I made [4] 23/3 27/17	53/25 55/13 56/7	I wouldn't [1] 25/19	12/5 16/6 16/7 16/11	includes [2] 93/3
55/10 105/18	56/10 56/18 57/2 59/5	I'd [22] 10/24 12/22	16/24 17/4 18/2 21/17	106/14
I may [4] 86/23	59/6 59/10 59/14	13/4 18/24 19/7 21/16	27/17 29/2 31/15 33/6	including [9] 32/24
106/13 119/22 123/5	59/16 59/18 61/4	25/7 28/12 32/12	33/12 35/13 35/16	36/23 41/23 42/10
I mean [2] 89/3 125/9	68/17 68/19 72/2 72/3	32/14 47/25 52/8	38/11 38/18 40/17	58/1 79/17 86/4
I mind [1] 75/16	72/14 72/19 75/16	54/20 55/2 56/19	41/20 47/9 48/17	100/22 106/11
I must [2] 32/10	75/23 83/15 86/9	67/13 67/20 81/8	48/18 52/17 58/2	increasingly [1]
66/22	86/11 87/2 87/22 88/9	86/22 97/20 122/10	58/14 62/11 62/17	23/16
I need [4] 14/23	89/3 89/19 92/24	124/12	63/8 63/11 64/5 64/16	incredibly [1] 67/22
50/25 51/19 124/19	92/24 98/3 98/8 98/20	I'll [2] 30/19 81/3	64/23 70/16 71/24	incurred [1] 36/15
I now [1] 105/13	103/13 103/14 112/5	I'm [57] 10/15 11/6	74/1 74/2 78/20 80/21	incurs [1] 39/9
I pick [1] 90/6	113/18 116/9 117/11	11/8 11/8 11/15 11/16	81/15 85/1 85/2 86/10	indeed [3] 66/13
I probably [3] 68/2	120/17 121/25 123/14	13/20 13/21 18/22	86/23 87/1 87/5 87/12	90/18 109/20
76/11 83/18	125/2 125/14 127/4	21/13 22/14 22/15	87/16 87/17 88/10	indemnity [3] 35/15
I provided [1] 67/6	I thought [2] 27/24	23/15 27/15 27/25	88/10 88/18 91/4 92/5	35/21 37/10
I put [3] 78/21 112/4	57/25	29/18 33/14 40/19	92/13 92/22 93/1 94/7	independent [6] 10/7
125/22	I took [1] 54/16	41/19 47/9 48/23	94/25 95/4 96/1 96/22	10/8 11/18 12/20
I raised [1] 111/22	I tried [2] 23/18 53/1	49/14 49/15 51/6	100/5 100/20 104/13	96/20 99/2
I realise [2] 21/22	I understand [3]	55/25 57/7 57/10	106/13 106/17 107/12	index [1] 91/20
110/11	102/5 102/7 127/12	58/11 60/23 69/17	109/20 110/9 111/4	indicate [2] 55/24
I recall [1] 10/21	I understand it [1]	70/8 71/17 71/18 74/1	111/7 112/4 112/7	119/14
I received [3] 73/19	121/7	80/1 80/19 83/9 87/21	112/11 114/18 119/22	indicated [1] 56/13
77/1 79/18	I used [2] 113/19	91/21 92/24 94/4	120/7 120/9 122/10	indicates [1] 39/11
	115/1	99/23 100/3 100/3	123/5 124/8 124/10	indirectly [1] 2/24

I	interest [7] 18/15 19/17 19/25 22/9 35/7 37/9 117/21	67/15 91/12	30/25 30/25 32/2 39/10 39/21 100/10 101/6 121/5	K	
individual [2] 24/2 109/19	interested [4] 17/24 18/13 18/23 108/14	involvement [2] 4/20 125/5	itself [1] 63/15	keen [4] 20/1 22/3 75/2 118/24	
individuals [10] 14/4 23/6 42/8 55/17 69/22 78/10 79/1 79/23 96/18 98/25	interesting [2] 76/14 111/9	involving [1] 95/1	J	Keith [4] 100/22 104/16 104/19 106/24	
induction [1] 72/18	interface [1] 121/13	irrelevant [1] 97/10	Jamasb [2] 51/3 59/1	key [1] 20/15	
indulgence [1] 100/5	interim [1] 16/3	is [181]	James [3] 50/17 50/18 50/21	kind [19] 3/13 7/25 10/24 24/12 29/8 43/8 44/25 53/17 71/24 88/6 89/1 89/9 103/17 110/3 113/6 113/10 117/12 119/14 124/16	
infer [1] 103/23	internal [3] 64/24 80/20 81/15	isn't [10] 8/3 18/22 28/19 38/8 39/25 40/9 63/15 69/6 106/22 118/1	January [1] 35/13	King [3] 41/5 41/8 85/20	
inflammatory [1] 107/23	interpret [1] 95/24	issue [33] 6/1 9/25 44/12 44/13 45/18 45/22 46/10 50/25 51/5 51/7 51/11 51/16 51/20 51/22 58/10 58/20 60/12 60/16 60/21 64/4 64/8 64/16 65/20 66/18 66/19 67/1 69/13 70/3 70/12 93/16 93/21 94/20 111/14	Jarnail [16] 1/17 1/20 2/25 3/2 3/12 3/14 5/5 5/7 5/13 6/9 7/5 17/12 17/22 25/23 26/9 41/4	King's [7] 57/17 60/14 66/17 71/3 73/8 84/20 99/17	
influence [1] 12/19	interpretation [3] 38/15 55/23 96/15	issued [4] 34/19 69/15 93/13 93/24	Jenkins [4] 26/19 54/6 54/9 60/7	kit [1] 44/13	
influenced [3] 110/6 110/18 110/23	interpretation/description [1] 38/15	issues [23] 9/24 11/19 36/14 40/25 41/14 41/17 41/24 42/11 44/20 44/22 47/25 58/2 87/24 95/13 112/17 112/25 113/17 116/14 116/18 116/20 118/4 119/13 120/16	Jennifer [1] 93/9	knew [5] 55/18 66/25 82/18 83/1 83/7	
information [8] 8/2 14/3 16/20 41/11 59/14 59/15 61/25 109/8	interpreted [1] 72/14	it [318]	job [3] 83/13 91/2 108/23	know [80] 3/22 6/7 16/17 18/1 18/5 21/11 23/12 24/12 24/16 24/25 27/15 27/17 27/24 29/13 29/18 29/25 30/5 30/14 32/10 32/17 42/14 44/14 45/5 45/11 45/12 47/9 47/19 48/3 48/7 48/7 48/16 55/10 55/22 57/20 59/2 59/19 60/3 67/4 72/5 72/9 74/25 77/1 77/3 77/12 78/3 78/25 83/8 83/10 83/16 88/25 90/22 91/23 98/14 99/3 99/4 99/11 99/14 102/20 102/21 102/22 102/24 104/2 104/5 104/6 107/3 107/17 108/16 108/21 110/10 111/21 112/4 113/12 114/10 116/9 122/10 124/10 124/12 124/14 125/19 125/25	King's [7] 57/17 60/14 66/17 71/3 73/8 84/20 99/17
informed [2] 15/23 92/7	intervene [1] 120/11	it's [43] 3/11 3/14 12/14 16/13 25/23 25/24 32/4 38/7 40/6 40/9 40/24 42/4 47/13 48/3 49/18 50/8 52/24 58/23 62/17 62/23 62/24 68/23 70/8 71/9 75/24 76/14 78/25 86/24 87/22 92/16 100/6 100/6 101/2 101/10 104/16 104/17 106/17 109/18 110/25 111/1 111/8 118/2 123/14	Jog [1] 76/2	kit [1] 44/13	
inherently [2] 21/1 43/21	interview [1] 81/21	items [3] 77/14 77/23 77/25	John [5] 38/20 60/6 76/19 100/22 104/18	knew [5] 55/18 66/25 82/18 83/1 83/7	
inherited [1] 119/8	interviewed [1] 80/23	its [13] 1/17 5/23 24/19 30/23 30/24	joined [4] 22/6 60/10 68/5 72/5	know [80] 3/22 6/7 16/17 18/1 18/5 21/11 23/12 24/12 24/16 24/25 27/15 27/17 27/24 29/13 29/18 29/25 30/5 30/14 32/10 32/17 42/14 44/14 45/5 45/11 45/12 47/9 47/19 48/3 48/7 48/7 48/16 55/10 55/22 57/20 59/2 59/19 60/3 67/4 72/5 72/9 74/25 77/1 77/3 77/12 78/3 78/25 83/8 83/10 83/16 88/25 90/22 91/23 98/14 99/3 99/4 99/11 99/14 102/20 102/21 102/22 102/24 104/2 104/5 104/6 107/3 107/17 108/16 108/21 110/10 111/21 112/4 113/12 114/10 116/9 122/10 124/10 124/12 124/14 125/19 125/25	know [80] 3/22 6/7 16/17 18/1 18/5 21/11 23/12 24/12 24/16 24/25 27/15 27/17 27/24 29/13 29/18 29/25 30/5 30/14 32/10 32/17 42/14 44/14 45/5 45/11 45/12 47/9 47/19 48/3 48/7 48/7 48/16 55/10 55/22 57/20 59/2 59/19 60/3 67/4 72/5 72/9 74/25 77/1 77/3 77/12 78/3 78/25 83/8 83/10 83/16 88/25 90/22 91/23 98/14 99/3 99/4 99/11 99/14 102/20 102/21 102/22 102/24 104/2 104/5 104/6 107/3 107/17 108/16 108/21 110/10 111/21 112/4 113/12 114/10 116/9 122/10 124/10 124/12 124/14 125/19 125/25
initials [1] 59/25	interviews [1] 107/19		John [5] 38/20 60/6 76/19 100/22 104/18	know [80] 3/22 6/7 16/17 18/1 18/5 21/11 23/12 24/12 24/16 24/25 27/15 27/17 27/24 29/13 29/18 29/25 30/5 30/14 32/10 32/17 42/14 44/14 45/5 45/11 45/12 47/9 47/19 48/3 48/7 48/7 48/16 55/10 55/22 57/20 59/2 59/19 60/3 67/4 72/5 72/9 74/25 77/1 77/3 77/12 78/3 78/25 83/8 83/10 83/16 88/25 90/22 91/23 98/14 99/3 99/4 99/11 99/14 102/20 102/21 102/22 102/24 104/2 104/5 104/6 107/3 107/17 108/16 108/21 110/10 111/21 112/4 113/12 114/10 116/9 122/10 124/10 124/12 124/14 125/19 125/25	knowing [1] 83/3
initiated [1] 48/20	into [45] 5/23 11/10 18/3 18/7 18/15 23/25 24/6 33/20 36/11 43/14 44/11 45/24 47/19 53/7 54/22 54/25 55/2 55/9 61/25 64/18 65/2 65/6 70/4 73/11 74/7 75/24 76/19 76/25 77/6 80/2 83/16 83/18 83/23 85/23 86/8 89/7 97/2 108/19 109/16 109/25 110/12 116/5 118/2 118/4 121/13		Jonathan [2] 26/18 122/19	knowledge [8] 9/22 46/12 61/7 62/2 89/13 90/5 92/6 95/24	
initiating [1] 14/5	investigate [3] 51/6 96/23 99/7		journal [1] 39/18	known [7] 9/16 9/23 10/1 68/10 70/16 93/15 95/19	
initiative [1] 101/25	investigated [1] 95/18		judge [1] 120/13		
innovations [1] 24/18	investigation [7] 11/19 26/18 82/7 93/22 94/19 96/15 121/1		judgment [10] 37/4 37/11 37/19 39/3 39/3 39/13 39/16 94/3 94/6 107/9		
input [3] 18/7 23/25 121/22	investigations [21] 6/18 32/11 78/13 78/17 83/22 83/24 83/24 84/12 84/14 84/23 86/5 87/8 88/19 92/17 92/20 120/4 120/24 121/2 124/4 124/9 124/24		Julia [2] 59/20 59/21		
inputting [1] 18/15	investigators [10] 78/22 80/24 82/8 83/2 83/7 83/13 83/14 83/20 84/8 84/16		July [4] 12/8 15/2 15/18 16/12		
INQ00001035 [1] 80/11	invite [4] 2/1 13/12 14/12 122/21		jumping [2] 26/25 28/9		
Inquiry [13] 45/1 47/7 73/4 73/7 75/23 76/1 77/4 79/4 79/6 79/18 79/20 81/2 115/6	invited [2] 21/6 79/19		just [61] 1/13 2/22 4/21 7/22 12/22 15/1 16/14 19/7 19/15 20/9 21/22 22/22 30/19 31/15 31/23 31/24 33/14 41/20 42/1 47/20 49/14 52/8 57/10 58/9 58/14 64/5 64/6 65/19 66/19 67/5 69/5 70/1 71/6 71/13 78/23 80/12 81/16 83/19 84/19 86/22 87/1 87/12 87/21 87/23 92/14 92/22 93/1 93/2 94/4 97/21 100/5 100/20 100/25 101/1 101/7 104/25 107/3 110/25 116/8 119/21 125/23		
insensitive [1] 79/15	inviting [3] 11/10 71/16 120/3		Justice [3] 18/9 30/1 110/11		
insert [2] 73/11 74/15	involved [12] 11/16 11/25 28/12 45/8 45/17 47/21 49/24 51/19 61/3 67/14		Justice Fraser [1] 110/11		
inserted [1] 85/23					
inset [1] 62/22					
insolvency [1] 39/1					
instructed [2] 39/1 57/7					
instructing [1] 8/7					
instruction [3] 6/2 14/21 85/22					
instructions [16] 3/13 3/17 5/21 6/6 8/1 8/6 8/10 14/14 14/18 14/20 101/22 102/1 102/5 102/6 102/10 102/18					
integrity [13] 20/16 20/19 28/16 28/18 29/23 30/15 30/17 57/12 57/18 61/10 70/20 108/6 112/21					
intend [1] 94/11					
intention [2] 2/12 39/12					

L	let's [11] 58/22 59/1 61/9 62/8 62/25 64/24 65/5 84/19 92/11 101/7 122/1	10/1	47/25 51/21 55/10 55/19 60/21 94/3 96/25 97/10 99/8 103/2 103/9 103/23 104/7 104/10 105/18 107/5 116/15 124/23	Marie [3] 100/22 104/18 106/24
last [16] 1/9 1/14 2/13 15/1 15/18 16/1 28/6 34/2 37/18 37/18 49/14 66/20 70/22 78/9 100/14 103/24	letter [3] 34/18 37/8 79/19	logged [2] 44/20 94/15	Magazine [2] 108/20 108/20	Marine [4] 34/15 93/14 101/1 105/8
lastly [1] 65/19	letterhead's [1] 48/19	long [6] 20/5 26/4 39/19 48/3 57/25 86/25	Mail [3] 4/23 25/13 67/15	MARK [3] 1/3 60/8 128/2
later [8] 11/5 11/8 11/11 38/6 60/22 93/6 117/12 124/2	letters [3] 46/5 107/24 107/24	longer [1] 78/4	maintain [1] 39/20	marker [2] 26/24 28/8
latest [1] 15/25	level [6] 21/14 21/15 31/6 37/10 59/19 103/18	Longman [7] 1/21 1/24 6/10 6/12 15/12 26/18 122/19	maintained [1] 27/8	Marketing [1] 48/13
law [28] 2/15 2/21 2/23 2/24 3/6 4/4 4/20 5/14 5/20 6/3 7/8 7/19 7/21 11/22 12/25 13/17 13/25 14/6 14/22 23/22 28/21 29/20 84/10 84/11 84/16 86/9 86/10 106/22	liaise [1] 96/17	look [35] 1/22 6/8 21/21 25/22 31/15 31/16 38/10 38/18 40/1 40/17 42/2 50/5 50/8 58/14 58/22 64/6 70/9 80/7 84/19 86/21 86/23 87/2 92/14 93/2 100/5 100/20 101/1 104/13 106/18 112/7 112/11 115/12 117/12 123/11 123/21	major [2] 25/3 25/5	marshall [1] 53/23
lawyer [6] 2/19 4/8 8/4 8/9 28/21 29/19	liaison [1] 93/18	looked [11] 17/17 52/24 63/17 66/20 70/10 81/25 86/22 87/3 90/7 109/4 123/23	make [36] 3/5 16/22 17/4 17/8 36/9 42/24 43/19 44/16 45/15 46/10 46/17 50/25 53/12 71/16 83/2 83/6 83/14 87/17 88/23 91/18 95/10 96/6 100/9 101/5 101/13 105/3 105/20 121/20 122/4 122/6 124/3 124/8 124/19 125/15 125/21 126/2	Martin [1] 41/5
lawyers [7] 13/25 14/15 17/11 40/16 47/21 48/4 101/24	lift [1] 29/10	looking [16] 1/10 9/3 10/20 20/24 22/21 23/16 27/15 27/23 27/25 45/1 60/11 60/16 88/19 89/5 92/16 110/21	maker [2] 126/7 126/10	Marwood [1] 59/20
lay [1] 86/18	light [2] 58/3 113/1	looks [6] 52/11 52/24 53/1 61/2 122/18 123/2	makes [5] 30/6 88/22 91/8 91/9 126/16	match [1] 66/8
lead [3] 11/22 23/22 43/25	like [38] 2/6 3/14 3/18 5/3 7/8 12/22 16/23 16/24 21/17 24/15 28/1 28/14 28/19 29/3 29/11 30/20 40/1 43/10 44/2 52/11 53/1 53/14 56/5 61/2 71/4 71/11 77/2 77/6 78/8 83/15 86/22 87/6 98/9 107/18 114/14 122/18 123/2 123/21	lose [1] 118/23	making [13] 18/17 29/22 39/15 45/13 45/14 46/15 47/2 85/5 87/5 101/8 102/18 112/24 121/24	matters [4] 23/20 47/17 53/15 90/15
leader [1] 20/16	likely [2] 51/1 77/25	loss [3] 64/15 65/23 70/16	man [2] 24/3 117/25	may [43] 1/1 3/4 11/19 18/6 18/8 19/20 21/24 32/23 32/24 33/10 44/1 44/3 44/3 44/6 45/22 45/25 47/6 47/12 51/9 75/20 80/8 86/23 91/7 91/10 92/4 92/7 92/24 100/12 103/18 103/22 106/13 106/15 109/19 117/10 119/22 123/5 123/5 123/10 125/24 126/5 126/22 127/6 127/24
leadership [2] 68/22 103/17	likewise [1] 115/19	lost [4] 62/15 97/25 98/1 98/5	managed [3] 4/11 43/5 55/8	maybe [6] 19/10 55/24 61/5 61/6 88/20 99/13
leading [3] 7/9 92/20 96/10	Limited [2] 75/10 105/10	lot [14] 19/18 24/13 24/16 25/6 33/21 45/21 47/24 48/1 57/20 60/24 68/20 68/21 107/17 109/21	manager [1] 59/18	McLean [1] 50/16
leads [1] 14/20	Limited's [2] 7/11 7/12	lots [13] 19/20 20/21 21/8 21/19 23/15 25/17 31/4 47/12 47/21 67/13 109/7 117/2 117/3	managers [4] 28/23 46/8 61/13 61/15	MD [4] 19/8 19/13 93/6 112/9
lean [1] 4/24	line [8] 7/24 15/7 27/2 37/18 80/22 81/16 81/16 81/17	lunch [1] 49/2	managing [8] 12/17 19/22 20/24 22/23 23/9 25/11 74/5 103/3	me [112] 1/5 2/18 2/20 3/7 3/13 3/17 3/17 4/6 4/9 5/7 6/3 6/3 7/25 8/5 8/6 8/7 8/9 9/2 10/3 13/2 13/11 13/18 13/19 14/11 14/18 14/20 14/22 15/23 15/24 17/1 17/3 17/8 17/9 18/1 18/20 18/22 19/10 19/13 19/20 19/21 20/1 21/11 21/11 21/12 22/2 22/13 22/21 22/22 23/11 23/17 23/17 25/3 25/4 25/16 30/6 32/16 32/23 32/24 33/10 38/5 49/11 50/15 55/20 55/20 56/16 61/22 62/7 69/8 69/17 69/25 71/6 72/20 74/3 75/16 76/1 78/20 79/3 79/8 80/5 80/14 80/16 81/7 83/19 83/20 86/3 86/6 86/13 88/7 88/18 88/23 91/8 91/10
learning [1] 72/7	line 22 [1] 80/22	lunchtime [1] 100/4	Mandy [11] 17/11 17/22 31/17 32/23 38/20 93/4 93/10 104/14 106/18 106/20 107/15	
least [4] 60/16 66/25 122/24 126/21	lines [3] 27/14 37/18 38/16	Lynn [3] 73/9 74/15 76/15	Mandy's [2] 18/21 19/19	
leave [1] 51/9	link [2] 89/1 89/3 89/14	M	manifest [1] 31/14	
leaving [1] 75/14	linkage [2] 84/1 89/14	machine [1] 43/13	manufactured [1] 107/8	
led [4] 10/18 33/10 47/7 117/19	linked [1] 43/18	made [31] 8/24 9/4 15/23 16/4 22/2 23/3 26/22 27/4 27/17 35/8 35/12 40/23 46/12	many [12] 11/24 23/11 31/1 32/25 33/1 67/22 68/19 75/12 79/9 79/11 99/23 102/23	
Lee [7] 31/21 32/1 32/8 93/14 93/16 94/9 105/7	links [1] 90/15		March [1] 49/21	
left [8] 1/9 32/11 41/17 58/15 68/25 69/5 76/12 109/18	list [9] 26/4 33/3 44/23 48/3 57/25 61/18 103/8 103/22 112/11			
left-hand [2] 41/17 58/15	listened [2] 78/19 78/24			
legal [21] 2/2 8/5 13/24 33/21 39/10 39/18 39/22 41/4 42/10 47/19 48/21 52/20 70/19 85/8 85/14 85/19 86/1 86/19 89/17 121/6 123/20	listening [1] 79/16			
length [1] 97/13	litigation [2] 41/24 87/24			
lengthy [1] 26/10	litigious [1] 95/16			
let [9] 7/25 8/6 18/1 18/5 18/20 30/13 83/19 91/14 107/3	little [8] 37/2 61/9 62/22 63/13 64/22 93/11 103/19 107/11			
	livid [2] 113/19 113/23			
	lividity [1] 114/3			
	locating [1] 94/20			
	Log [3] 9/16 9/23			

M	minds [1] 124/11	1/21 1/23 1/24 3/15	Mr Winn's [1] 12/6	namely [1] 27/7
me... [20] 91/14	mindset [1] 110/14	6/10 6/12 7/22 8/11	Mr X [2] 122/9 126/7	names [1] 73/25
91/18 97/12 98/7	minimise [1] 20/7	10/4 12/6 15/12 29/13	MS [8] 72/23 74/20	narrative [2] 24/1
98/15 99/12 105/9	minimising [1]	29/15 38/1 38/21 39/4	76/19 77/20 98/24	41/18
115/2 115/9 120/9	113/14	49/16 57/2 57/4 57/5	104/25 122/9 128/8	narrowed [1] 103/21
121/8 121/12 121/24	Minister [1] 18/10	57/10 57/17 58/5	Ms Hobbs [2] 76/19	national [6] 22/9
122/8 122/19 123/8	ministers [1] 30/1	60/14 63/13 66/14	77/20	108/4 111/10 111/13
123/11 125/10 125/15	minor [1] 104/24	66/17 66/24 68/4	Ms Talbot [1] 104/25	117/1 117/14
125/21	minority [1] 116/24	68/16 69/6 71/2 71/6	Ms Talbot's [1] 98/24	natural [1] 89/13
mean [7] 14/18 52/18	minutes [1] 66/20	71/7 71/9 71/15 73/1	Ms van [1] 74/20	nature [9] 7/7 24/12
52/20 54/19 89/3	misapprehension [1]	73/8 78/16 84/20 87/5	Ms Y [1] 122/9	47/6 67/18 72/11 79/6
109/18 125/9	125/24	90/9 91/12 91/23	much [26] 1/7 2/11	89/4 108/22 110/10
meaning [1] 30/3	mismatch [8] 49/19	92/12 94/4 94/22 95/1	8/12 19/3 19/7 22/1	NBSC [5] 44/1 45/23
means [5] 6/7 8/8	50/1 52/2 58/10 58/20	97/14 99/16 103/2	28/11 39/16 40/3	45/25 108/9 118/6
35/21 39/8 125/17	60/12 65/15 67/1	103/2 105/3 105/7	49/12 49/13 56/24	necessarily [2] 82/19
meant [4] 7/3 7/4	Misra [9] 15/8 17/19	105/20 107/5 108/13	75/4 79/16 80/21	114/3
86/18 112/18	24/23 25/4 26/7 40/10	111/17 112/8 113/15	81/11 81/22 84/8 93/6	necessary [6] 4/10
media [3] 23/12 24/6	40/21 119/25 120/13	117/21 119/22 120/9	99/19 100/3 114/12	5/5 86/10 95/22 96/9
75/4	missing [2] 43/12	121/6 121/8 121/22	118/24 119/15 127/3	96/22
meet [3] 47/11	83/6	122/3 122/9 122/23	127/21	necessitate [1] 96/13
120/15 120/21	mistake [2] 50/7	123/1 123/6 123/9	multiple [1] 115/21	need [13] 2/5 14/23
meeting [5] 21/20	103/6	123/16 123/25 124/5	multis [1] 115/20	29/14 39/15 40/2
44/14 48/5 58/23	mistaken [1] 105/14	124/14 126/5 126/6	must [10] 32/10	50/25 51/19 87/18
120/22	mistakes [1] 94/2	126/7 126/22 127/5	66/22 76/8 77/7 77/20	87/25 88/13 100/9
meetings [5] 10/21	mistresses [1] 57/7	127/15 128/4 128/6	77/22 104/7 104/9	101/5 124/19
21/18 42/8 42/13	mixed [1] 11/17	Mr Andrew [1]	122/8 123/20	needed [9] 2/16 4/9
116/16	modelling [4] 84/1	111/17	mustn't [1] 77/23	16/9 16/22 27/11
members [7] 69/11	84/2 84/7 89/8	Mr Baines [1] 38/21	my [96] 4/25 5/3 5/11	46/10 48/4 88/11
69/12 70/2 97/5	moment [6] 15/14	Mr Beer [12] 57/17	6/19 6/21 7/17 9/7	125/3
116/12 116/15 117/5	62/9 64/7 71/6 126/21	60/14 66/17 71/2 73/8	9/22 9/25 11/21 11/23	needn't [1] 120/25
membership [1]	126/23	84/20 99/16 120/9	11/24 12/1 12/2 12/23	needs [3] 5/15 47/5
61/13	Monday [1] 17/20	124/5 126/22 127/5	13/1 13/3 13/24 14/21	47/15
memory [6] 1/13	money [11] 43/12	127/15	19/3 19/7 19/9 19/24	neither [1] 15/12
60/24 76/2 79/21	81/7 81/8 81/12 81/13	Mr Castleton [7] 39/4	20/12 22/2 23/2 31/12	network [13] 37/13
103/11 106/15	82/1 82/2 83/5 105/9	92/12 94/4 94/22	32/21 32/25 33/3 33/4	37/21 41/10 41/12
mention [2] 35/7 88/3	109/17 109/20	105/3 105/20 107/5	33/8 38/2 42/21 43/16	44/19 46/7 47/2 47/4
mentioned [1]	month [3] 18/24 32/4	Mr Castleton's [1]	45/7 45/7 45/24 50/7	48/12 59/21 96/4
109/14	77/21	38/1	54/21 54/25 55/9	103/20 116/25
merely [1] 36/12	months [6] 17/13	Mr David [1] 112/8	55/13 55/22 55/25	never [4] 34/25 81/8
message [2] 44/9	17/14 18/25 49/22	Mr Ismay [22] 1/8	56/3 56/9 57/5 60/4	81/24 124/22
122/18	118/19 118/19	3/15 10/4 49/16 57/10	60/24 61/7 61/16	new [7] 9/16 43/2
messages [1] 18/4	more [19] 2/5 8/17	58/5 63/13 66/14	61/24 62/2 62/24	44/19 48/23 64/19
met [2] 18/10 96/1	18/20 33/18 39/20	66/24 68/4 68/16 69/6	62/25 67/21 69/19	72/3 88/10
middle [6] 12/6 38/19	40/7 42/25 63/10	71/6 71/7 71/9 73/1	71/9 72/10 75/23 76/2	news [4] 100/8 101/4
43/7 50/9 58/19 65/11	63/13 71/20 71/21	103/2 108/13 113/15	76/25 79/5 79/21	107/15 107/21
Midlands [2] 7/2 9/10	72/16 75/24 80/8	117/21 119/22 126/6	79/25 81/23 81/24	next [4] 17/25 72/22
midnight [2] 13/6	103/19 103/25 106/13	Mr Longman [5] 1/21	81/24 81/25 83/21	90/6 94/8
13/10	106/15 107/11	1/24 6/10 6/12 15/12	84/5 91/1 98/11 103/6	NFSP [6] 21/18 24/17
might [16] 2/6 8/5	morning [7] 1/5 1/8	Mr Singh [12] 29/13	106/9 107/18 108/17	116/10 116/13 118/9
10/6 19/10 21/23	17/20 48/25 56/13	29/15 121/6 121/8	108/23 110/6 110/14	119/6
43/12 43/25 46/11	120/1 127/19	121/22 122/3 123/6	110/18 110/23 113/8	nice [1] 28/4
47/10 52/23 71/22	most [3] 77/25 83/21	123/9 123/16 123/25	113/17 117/4 117/5	nicest [1] 75/3
88/14 89/4 91/19	103/7	124/14 126/5	118/15 118/21 119/5	night [5] 1/9 1/14
91/25 103/8	motive [3] 30/8 71/15	Mr Singh's [1] 7/22	119/7 119/15 120/7	2/13 34/2 100/14
migration [3] 64/14	71/17	Mr Smith [2] 71/15	122/15 125/18 126/6	Nixdorf [2] 44/7
112/17 118/4	mounting [1] 27/20	103/2	myself [4] 20/24 21/4	45/19
Mike [12] 17/24 18/3	mounting [1] 27/20	Mr Stein [3] 57/2	25/19 103/14	no [88] 2/14 5/25
18/6 24/10 24/12	move [6] 17/10 40/14	57/4 128/6	mystified [1] 23/16	6/11 6/17 6/21 10/11
51/19 60/5 76/8 76/12	48/23 49/14 52/23	Mr Tatford [1] 1/21	mystifies [1] 22/21	10/11 11/21 11/21
76/15 76/23 77/16	92/11	Mr Utting [6] 78/16		12/22 12/23 13/16
mind [9] 19/4 19/7	moved [4] 32/13	87/5 90/9 91/12 91/23	N	16/7 16/10 18/19 20/9
19/9 67/21 71/9 75/16	32/14 33/2 112/15	97/14	name [2] 57/5 59/8	24/7 24/8 24/9 28/10
101/3 111/1 111/2	moves [1] 85/11	Mr Winn [4] 1/23	named [2] 26/11	29/15 29/24 30/19
	moving [1] 23/4	8/11 122/23 123/1	61/20	30/19 34/20 35/1 35/8
	MR [87] 1/4 1/8 1/21			

<p>N</p> <p>no... [61] 36/4 37/8 39/11 39/19 50/13 50/15 50/15 50/21 50/24 57/16 66/15 66/16 71/17 73/5 73/7 74/6 74/22 74/24 75/23 76/6 76/7 76/13 78/4 78/5 78/8 78/14 80/9 82/1 82/2 83/18 86/14 87/15 87/15 89/19 91/14 91/14 91/14 93/21 95/20 99/5 102/22 103/4 103/11 104/4 105/25 106/2 106/6 106/7 106/9 107/6 109/13 114/2 114/13 114/16 114/17 115/25 116/1 116/3 117/24 118/2 118/2</p> <p>nobody [4] 14/9 14/10 41/9 125/23</p> <p>noise [1] 51/14</p> <p>non [2] 8/9 54/11</p> <p>non-colour [1] 54/11</p> <p>normal [1] 8/3</p> <p>not [127] 1/25 2/17 3/14 4/3 5/23 6/21 8/8 8/8 8/19 9/1 9/2 10/9 10/15 11/11 12/19 13/11 13/18 14/4 14/19 15/23 16/5 16/18 16/19 16/22 17/3 17/7 20/12 21/2 23/1 23/10 28/4 29/11 30/5 30/13 34/7 35/7 35/14 35/16 36/1 36/7 36/12 37/9 38/6 39/8 41/19 42/4 43/6 44/4 47/9 51/6 51/7 55/12 55/25 60/23 62/11 65/13 66/24 67/2 68/15 68/20 69/17 69/25 71/17 73/5 73/22 74/1 74/8 74/17 74/24 75/1 75/8 76/3 77/13 78/12 79/12 79/16 79/22 81/19 82/9 82/19 83/4 84/13 86/1 86/13 91/16 92/9 93/22 96/1 96/24 97/2 97/24 98/4 98/17 99/4 101/24 105/16 108/13 109/18 110/25 111/7 111/14 112/4 112/21 113/2 114/1 114/10 115/20 116/10 116/18 118/2 118/18 119/4 119/11 119/19 120/10 120/20 121/10 122/8 123/11 124/6 124/9 124/15 124/24 125/11</p>	<p>125/19 125/21 126/22</p> <p>note [11] 38/10 42/3 43/6 62/14 65/2 65/6 65/12 65/13 76/14 109/23 110/2</p> <p>notes [3] 4/15 43/6 58/20</p> <p>nothing [5] 20/5 47/6 65/2 65/6 71/7</p> <p>notice [3] 73/23 76/20 76/21</p> <p>notices [1] 118/22</p> <p>November [2] 32/3 92/15</p> <p>now [35] 15/5 20/14 24/2 27/15 32/13 35/15 39/3 40/19 40/21 41/7 52/17 56/25 58/9 58/13 60/14 60/20 62/8 62/21 64/2 64/22 66/12 66/16 67/24 71/10 99/18 100/9 100/17 100/18 101/5 103/11 105/13 110/19 113/2 114/11 121/18</p> <p>nuance [1] 125/23</p> <p>number [37] 5/8 10/21 12/24 12/25 21/17 23/13 25/1 28/17 28/22 29/10 36/3 36/11 42/22 43/7 47/25 55/3 56/18 57/6 66/16 71/10 72/8 72/25 81/17 86/24 89/6 92/13 96/18 96/25 97/16 97/22 98/25 99/8 100/21 108/25 109/16 113/21 114/6</p> <p>numbering [2] 80/20 81/16</p> <p>numbers [1] 45/24</p>	<p>121/10</p> <p>occurred [4] 12/11 18/2 107/7 126/19</p> <p>October [6] 17/13 26/2 41/1 42/2 63/17 63/24</p> <p>October 2013 [1] 42/2</p> <p>odd [2] 77/2 77/11</p> <p>off [8] 1/9 37/3 37/7 46/3 50/24 67/5 100/7 112/18</p> <p>off-chance [1] 46/3</p> <p>offer [10] 34/3 34/9 34/10 35/6 35/8 35/12 36/19 37/7 71/24 100/15</p> <p>office [73] 3/6 4/4 4/8 5/14 7/8 7/11 7/12 7/20 10/9 10/15 10/17 13/18 13/25 14/2 14/23 15/12 16/6 16/7 16/21 16/25 20/15 21/2 22/3 22/5 22/7 22/11 22/14 22/18 22/23 23/9 25/12 25/14 27/4 28/24 30/22 37/20 41/4 41/16 42/9 42/10 42/19 43/17 43/18 48/8 48/18 49/25 58/15 59/6 60/11 68/6 72/4 72/13 74/25 75/10 75/13 75/15 76/13 78/11 80/24 85/7 85/13 94/19 98/1 98/5 105/8 105/10 105/11 111/11 114/17 116/18 116/25 119/5 119/7</p> <p>Office's [4] 29/20 37/25 39/25 40/24</p> <p>Officer [1] 26/18</p> <p>often [2] 47/10 90/25</p> <p>Oh [1] 87/22</p> <p>oil [2] 13/6 13/10</p> <p>okay [32] 9/11 11/6 15/6 17/21 41/2 49/17 50/5 57/9 57/23 58/7 58/11 58/20 60/8 60/14 61/9 62/8 63/6 63/22 64/20 65/11 65/25 74/18 80/10 85/12 101/23 102/12 104/11 104/22 120/19 121/4 125/2 127/12</p> <p>on [179]</p> <p>one [55] 10/12 16/11 16/13 20/14 20/18 21/5 24/4 24/5 29/21 31/6 35/21 42/25 44/9 45/15 48/16 51/10 51/21 52/12 52/13 53/9 55/10 62/6 67/5</p>	<p>67/8 68/17 68/23 71/6 73/18 74/14 75/12 78/1 83/1 83/12 87/3 92/15 92/25 98/5 98/8 98/13 99/13 100/7 100/17 102/15 103/24 106/13 107/20 109/15 109/23 112/5 112/5 115/1 116/8 118/1 119/21 123/4</p> <p>one-sided [2] 24/5 118/1</p> <p>one-touch [1] 42/25</p> <p>ones [3] 3/7 35/22 92/25</p> <p>ongoing [3] 42/10 52/21 70/19</p> <p>Online [2] 64/14 108/9</p> <p>only [11] 18/24 36/22 51/8 56/24 62/23 62/25 64/16 72/4 75/17 77/13 84/22</p> <p>onto [1] 112/15</p> <p>open [11] 2/1 13/12 14/12 82/10 109/17 109/17 109/25 110/1 118/5 118/13 122/21</p> <p>open-ended [2] 2/1 13/12</p> <p>opening [1] 112/20</p> <p>openly [1] 119/5</p> <p>operate [1] 2/6</p> <p>operated [2] 67/2 115/21</p> <p>operations [3] 9/12 15/20 50/14</p> <p>opportunity [6] 20/7 20/10 20/13 22/13 30/16 89/14</p> <p>or [86] 2/4 4/10 5/22 6/25 8/8 9/7 10/8 11/13 15/13 16/19 18/25 18/25 20/5 20/9 20/18 24/19 32/21 34/13 38/6 41/17 43/6 44/1 44/3 47/3 50/19 51/7 51/8 51/9 55/12 57/11 60/22 61/21 62/7 63/23 65/23 66/13 75/21 76/25 77/7 78/1 79/10 79/11 81/24 82/10 83/21 84/5 85/20 85/22 87/13 89/23 91/24 92/20 94/15 96/18 96/24 97/2 97/5 97/11 98/25 103/9 103/17 103/25 104/14 106/3 108/4 108/14 108/20 109/20 110/22 111/4 111/22 112/4 112/22 114/10 114/21 115/20 118/22 119/21 121/10</p>	<p>122/9 123/9 124/15 125/11 125/19 126/6 126/8</p> <p>order [2] 69/21 75/5</p> <p>ordered [1] 94/2</p> <p>organisation [25] 2/19 14/5 20/22 21/9 22/8 23/5 23/7 23/15 24/21 24/21 30/22 31/3 46/6 50/14 53/21 56/22 72/3 72/7 90/25 91/1 108/5 110/7 110/14 115/14 115/17</p> <p>organisations [2] 91/3 91/18</p> <p>original [3] 33/16 67/9 78/3</p> <p>originally [2] 76/16 90/20</p> <p>other [54] 8/22 10/12 13/3 13/10 16/10 20/12 20/21 21/1 21/19 21/23 23/3 26/24 28/8 30/4 31/18 37/16 37/22 40/4 40/6 44/5 52/22 53/9 55/15 55/25 58/5 63/4 63/17 67/22 68/19 72/17 72/25 73/2 73/5 74/9 74/16 75/1 75/25 76/6 85/22 85/24 86/23 89/21 90/3 91/2 91/19 93/10 94/12 95/5 95/8 109/7 109/13 110/1 115/9 119/18</p> <p>others [5] 29/14 29/22 38/23 54/7 109/3</p> <p>others' [1] 110/7</p> <p>ought [1] 92/2</p> <p>our [16] 6/2 33/16 34/2 34/11 34/12 35/13 35/14 35/15 36/19 39/7 44/19 51/3 70/13 90/21 100/14 111/14</p> <p>ours [1] 36/13</p> <p>ourselves [1] 120/25</p> <p>out [36] 1/16 13/2 16/15 20/8 24/6 28/17 40/12 43/5 47/15 53/16 55/12 64/3 70/13 72/14 84/24 87/17 88/15 88/21 94/25 97/12 98/10 100/11 105/15 106/4 106/7 110/9 111/24 112/19 113/16 113/16 114/7 115/6 115/22 116/7 117/23 120/24</p> <p>outbox [1] 77/14</p> <p>outcome [1] 29/21</p> <p>outcomes [1] 20/2</p> <p>outlining [1] 127/10</p>
---	--	---	---	---

O
outside [3] 30/14
 41/24 119/6
over [13] 33/12 34/24
 41/14 44/10 51/15
 64/6 64/23 66/20
 94/20 118/4 120/3
 124/6 127/4
overall [3] 54/15
 57/21 64/14
overlap [3] 43/15
 44/16 45/2
overlapped [1] 43/22
overruled [2] 17/1
 17/3
oversaw [1] 44/8
overseeing [2] 2/15
 84/17
oversight [1] 84/10
owed [1] 105/9
own [9] 23/1 39/10
 61/24 68/15 79/5
 79/21 98/11 101/25
 125/5
owned [1] 71/19
owner [3] 23/10
 56/21 69/24
owners [1] 23/6
ownership [1] 69/21
owns [1] 69/9

P
pack [4] 7/12 7/13
 14/8 73/14
packs [2] 10/13
 106/11
page [58] 1/14 1/18
 1/19 1/22 6/9 6/25
 7/23 9/9 12/5 12/7
 25/22 31/16 33/12
 33/13 36/20 38/19
 41/14 47/20 50/8 50/9
 54/5 54/10 62/11
 62/14 62/17 63/11
 63/12 64/2 64/2 64/6
 64/23 64/24 65/1
 65/11 65/21 70/8
 72/23 72/24 80/19
 80/20 80/21 81/15
 85/2 86/25 87/2 87/14
 87/16 87/21 90/6
 91/21 95/5 100/6
 104/13 106/17 107/24
 110/22 112/11 128/8
page 1 [6] 1/19 31/16
 38/19 47/20 64/2 64/2
page 14 [2] 80/20
 80/21
page 16 [1] 112/11
page 17 [1] 81/15
page 2 [3] 6/25 64/24
 104/13
page 25 [1] 85/2

page 33 [1] 106/17
page 4 [1] 80/19
page 5 [1] 63/12
page 63 [1] 100/6
page 86 [1] 86/25
page 87 [1] 87/2
pages [4] 54/23 55/9
 62/10 92/25
pagination [1] 64/25
paid [1] 98/10
paper [2] 126/18
 126/24
paragraph [8] 37/19
 85/3 87/23 90/7 90/8
 94/8 100/13 100/25
paragraph 1 [1]
 87/23
paragraph 5.19.10 [1]
 85/3
paragraphs [2] 85/4
 85/10
parameters [1] 2/3
part [27] 2/18 6/13
 6/18 6/19 6/20 6/21
 18/17 18/19 22/9 31/2
 35/12 50/13 55/20
 57/13 59/5 60/18
 66/21 70/10 90/9 94/9
 103/16 104/20 104/20
 105/3 105/22 105/23
 117/18
particular [12] 9/3
 57/11 60/9 60/15
 66/17 66/19 67/1 70/3
 91/17 110/19 120/2
 121/6
particularly [2] 56/5
 108/14
parties [4] 36/13
 36/15 96/8 120/15
partly [1] 80/17
parts [3] 20/21 86/23
 89/17
party [3] 35/18 35/21
 35/24
passed [1] 7/5
passes [1] 46/25
passionate [2] 22/5
 22/6
passwords [1] 82/18
past [2] 23/3 95/4
paste [3] 76/18 77/11
 78/1
pasted [2] 77/21
 77/22
patience [1] 100/2
pause [1] 93/1
pay [5] 34/13 34/14
 34/16 35/13 35/15
paying [2] 35/20 36/1
payment [1] 37/6
payments [9] 49/19
 50/1 51/4 51/11 52/2
 58/10 58/20 60/12

65/15
PayPoint [1] 114/21
peers [1] 91/2
pending [5] 33/7
 51/24 52/2 52/6
 118/22
people [41] 11/25
 21/20 21/24 23/13
 23/15 24/20 26/4
 28/25 30/23 31/1 31/4
 31/18 32/25 33/1
 41/10 41/11 43/4
 43/22 46/5 46/6 46/11
 47/11 48/6 61/21
 61/23 61/24 62/6 62/7
 69/22 75/2 79/8 83/4
 100/21 101/10 102/9
 102/9 102/22 103/14
 103/22 103/24 116/19
people's [1] 75/25
perceived [2] 5/17
 114/18
perception [3] 7/17
 75/23 116/14
perfect [1] 33/23
perfectly [1] 8/3
perform [1] 24/11
performance [1]
 68/15
perhaps [13] 3/23
 43/22 44/21 44/25
 55/16 56/19 56/20
 88/13 104/12 104/21
 106/15 114/20 115/7
period [4] 64/17
 64/19 78/15 118/23
permission [2] 39/17
 120/24
permitted [1] 5/23
person [7] 21/10
 22/3 22/24 50/22
 101/13 103/8 123/13
personal [1] 117/21
phase [3] 49/21
 79/17 117/10
Phase 1 [1] 79/17
phrase [9] 3/12 3/14
 9/23 14/17 14/19
 21/22 21/24 30/5
 71/11
physical [1] 83/23
pick [3] 1/8 80/22
 90/6
picked [2] 40/12
 51/16
pictures [1] 108/17
piece [4] 24/4 24/5
 40/9 44/13
pieces [1] 89/6
pillars [1] 44/18
Ping [1] 42/21
pitch [2] 87/5 90/10
place [6] 22/7 43/21
 69/10 69/18 69/23

95/21
plainly [2] 82/25
 97/15
planning [1] 108/10
pleaded [1] 34/25
pleasant [1] 38/6
please [42] 3/12 3/16
 6/9 7/13 7/25 12/5
 14/24 17/10 18/3
 25/21 25/23 31/15
 31/16 33/12 40/14
 40/18 41/9 41/14
 41/20 42/1 47/20 49/5
 50/5 50/8 51/19 60/20
 64/3 72/22 80/11
 80/11 80/19 81/4
 81/15 85/2 86/21
 86/24 92/13 93/1
 100/1 120/8 123/11
 127/17
pliant [1] 24/2
plus [1] 37/5
pm [1] 127/22
PO [1] 108/20
point [29] 4/12 10/2
 19/19 30/24 47/4
 47/24 48/8 48/18
 51/13 55/3 63/9 65/2
 65/6 65/21 66/5 70/11
 70/12 70/15 70/18
 71/22 77/23 83/10
 90/6 97/10 108/22
 121/13 122/2 123/5
 125/18
pointed [1] 13/2
points [2] 70/23
 111/22
POL [20] 59/4 59/9
 59/22 59/23 60/3
 61/12 62/5 69/2 85/19
 93/13 96/2 96/14
 96/17 96/23 97/5
 97/25 99/6 106/3
 114/13 121/6
POL Legal [2] 85/19
 121/6
POL/Fujitsu [1]
 96/23
POL00026572 [1]
 112/8
POL00028838 [3]
 58/12 64/3 70/8
POL00038853 [1]
 85/1
POL00043369 [1]
 40/18
POL00043371 [1]
 42/2
POL00044997 [1]
 25/21
POL00055100 [1]
 1/11
POL00055225 [1]
 14/24

POL00055418 [1]
 17/10
POL00069775 [1]
 104/12
POL00090437 [3]
 86/24 100/6 106/17
POL00107426 [1]
 92/13
POL00113488 [1]
 38/18
POL00113909 [1]
 31/15
POLCT [1] 85/19
POLFS [2] 112/14
 112/16
POLSAP [3] 65/3
 65/7 65/7
pored [1] 120/3
position [4] 16/18
 17/4 36/6 114/22
positive [4] 19/2
 68/12 68/21 68/22
Posnett [1] 41/8
possibility [4] 79/25
 91/24 100/12 103/24
possible [20] 2/11
 8/13 16/14 18/15
 33/23 39/16 40/3
 62/17 62/21 75/2 75/4
 78/17 79/16 95/9
 96/11 99/17 99/21
 104/1 125/14 127/5
possibly [4] 46/18
 72/16 83/4 87/19
post [66] 3/6 4/4 4/8
 5/14 7/8 7/11 7/12
 7/20 10/9 10/15 10/16
 13/18 13/25 14/2
 14/23 15/11 16/6 16/7
 16/21 16/25 20/15
 21/2 22/5 22/6 22/11
 22/14 22/18 25/14
 27/4 28/23 29/19
 30/22 37/20 37/25
 39/3 39/24 40/23 41/4
 41/16 42/9 42/10
 49/25 58/15 59/6
 60/11 68/6 72/4 72/13
 74/25 75/10 75/13
 75/15 76/13 78/11
 80/23 85/7 85/13
 97/25 98/5 105/8
 105/9 114/17 116/17
 116/24 119/5 119/7
post-judgment [1]
 39/3
postmaster [5] 93/14
 105/7 105/11 107/7
 108/25
postmasters [17]
 11/10 18/9 37/16
 37/23 38/10 39/22
 40/4 40/8 94/12 94/15
 95/6 95/8 95/14 96/25

<p>P</p> <p>postmasters... [3] 97/4 116/22 117/11</p> <p>potential [3] 70/19 73/2 76/6</p> <p>potentially [2] 95/6 115/12</p> <p>practice [1] 117/17</p> <p>practitioner [1] 39/1</p> <p>preceding [1] 87/13</p> <p>precisely [1] 126/19</p> <p>predecessors [1] 24/19</p> <p>preliminary [1] 120/14</p> <p>present [2] 84/9 111/6</p> <p>presented [3] 55/19 76/1 118/8</p> <p>press [8] 19/18 19/20 19/21 20/7 51/15 75/3 78/8 79/7</p> <p>presumably [9] 12/11 27/14 59/25 77/14 77/16 77/24 92/16 94/16 101/10</p> <p>presume [1] 101/12</p> <p>prevalent [1] 27/6</p> <p>previous [7] 22/10 32/25 33/2 41/14 67/20 92/15 99/12</p> <p>previously [2] 51/21 68/9</p> <p>primarily [1] 83/25</p> <p>principally [2] 17/11 54/9</p> <p>Printed [1] 63/5</p> <p>prior [2] 73/16 93/16</p> <p>prioritisation [1] 118/10</p> <p>privatisation [3] 4/23 25/13 67/16</p> <p>proactive [1] 107/22</p> <p>probably [20] 12/15 13/7 19/9 22/2 24/14 32/18 33/5 34/4 42/16 52/4 61/17 68/2 72/6 76/4 76/11 77/2 78/18 83/18 118/6 118/7</p> <p>problem [6] 35/1 66/2 98/18 111/6 113/14 114/19</p> <p>problems [12] 9/17 30/14 94/13 94/23 97/3 111/5 111/19 112/12 114/15 116/6 117/5 117/6</p> <p>problems/resolution s/errors [1] 97/3</p> <p>procedure [3] 95/21 96/7 109/12</p> <p>proceed [3] 85/17 85/18 85/22</p>	<p>proceeded [1] 3/25</p> <p>proceedings [4] 34/19 93/13 93/21 93/24</p> <p>process [20] 4/24 5/2 5/9 5/20 6/1 10/24 11/3 13/24 29/17 46/13 53/20 55/1 64/11 68/14 68/22 77/4 85/5 86/17 89/23 97/8</p> <p>processes [3] 12/1 90/5 124/17</p> <p>produce [3] 8/15 8/16 19/8</p> <p>produced [1] 122/11</p> <p>producing [1] 24/4</p> <p>product [13] 7/4 9/1 20/25 32/14 33/4 42/18 43/18 43/23 43/25 44/18 90/1 108/18 111/19</p> <p>products [4] 43/3 44/17 48/1 118/11</p> <p>professional [5] 68/11 69/15 96/20 99/2 124/16</p> <p>programme [5] 42/20 43/17 48/8 48/9 111/18</p> <p>progress [4] 15/25 19/12 36/23 107/20</p> <p>project [1] 42/21</p> <p>projects [1] 5/1</p> <p>promised [1] 18/1</p> <p>prompt [1] 65/13</p> <p>prompted [1] 60/24</p> <p>proof [2] 26/21 82/11</p> <p>proper [1] 121/22</p> <p>properly [3] 66/13 67/3 95/17</p> <p>proportionality [1] 36/15</p> <p>proportionate [1] 36/10</p> <p>proposed [3] 104/21 105/2 105/3</p> <p>prosecution [7] 7/13 16/8 16/20 17/5 85/16 90/14 90/19</p> <p>Prosecutions [1] 86/12</p> <p>prosecutors [1] 29/25</p> <p>prospect [3] 2/1 12/3 13/12</p> <p>prosperity [1] 96/3</p> <p>prove [1] 81/18</p> <p>provide [8] 3/16 14/23 70/24 75/15 90/19 96/19 97/6 99/1</p> <p>provided [2] 67/6 95/15</p> <p>provides [1] 54/12</p>	<p>providing [1] 90/23</p> <p>proving [1] 5/10</p> <p>provoke [1] 106/15</p> <p>public [2] 18/13 86/12</p> <p>publicity [2] 39/20 40/7</p> <p>publish [1] 39/18</p> <p>pull [1] 20/22</p> <p>purely [1] 34/19</p> <p>purposes [1] 5/10</p> <p>put [16] 20/8 54/25 56/9 69/19 78/21 82/25 83/16 83/18 112/2 112/4 113/22 114/8 114/9 115/14 120/6 125/22</p> <p>putting [2] 10/4 58/6</p> <p>puzzled [1] 77/9</p> <p>puzzling [1] 3/14</p> <hr/> <p>Q</p> <p>qualified [1] 84/13</p> <p>question [24] 2/2 3/24 3/25 7/7 7/7 9/21 25/7 25/8 33/8 33/20 53/16 54/13 56/3 56/14 67/25 69/8 69/16 71/11 71/23 75/10 110/12 111/8 115/7 125/7</p> <p>Questioned [8] 1/4 57/4 72/23 119/20 128/4 128/6 128/8 128/10</p> <p>questioning [2] 30/16 82/10</p> <p>questionnaire [1] 94/11</p> <p>questions [25] 8/17 9/5 9/8 16/3 22/25 25/15 44/3 49/15 51/17 54/6 54/10 56/3 56/25 57/16 57/20 58/9 66/16 81/1 119/16 119/18 119/22 127/4 127/6 127/7 127/11</p> <p>quick [1] 87/2</p> <p>quickly [1] 51/2</p> <p>quite [14] 16/14 23/8 28/22 35/24 43/15 44/10 45/2 51/2 59/17 85/24 92/7 97/22 119/9 123/14</p> <hr/> <p>R</p> <p>radar [1] 20/1</p> <p>raised [5] 46/7 48/2 53/16 111/22 112/1</p> <p>raising [4] 47/4 83/10 113/13 118/18</p> <p>rate [1] 68/14</p> <p>rather [9] 23/24</p>	<p>25/24 45/24 46/20 58/3 59/24 86/19 86/25 93/6</p> <p>rationale [1] 20/12</p> <p>re [1] 40/25</p> <p>reach [1] 61/14</p> <p>reached [1] 60/17</p> <p>read [7] 39/6 63/1 65/5 73/20 74/19 78/8 81/3</p> <p>readily [1] 71/20</p> <p>reading [3] 33/15 75/3 97/12</p> <p>reads [1] 10/2</p> <p>real [3] 10/4 60/10 111/6</p> <p>realise [2] 21/22 110/11</p> <p>really [11] 11/11 13/22 23/5 25/8 43/18 55/2 79/1 79/18 119/24 125/18 126/18</p> <p>reason [13] 4/13 4/16 5/19 10/5 12/23 13/8 13/11 29/19 36/1 55/20 78/23 80/8 81/10</p> <p>reasonable [4] 26/21 103/1 103/7 123/14</p> <p>reasonably [2] 2/6 62/4</p> <p>reasons [21] 4/18 8/11 8/19 8/22 8/22 19/2 19/16 20/11 23/24 24/9 28/13 28/15 31/4 31/9 31/13 46/23 56/15 56/15 57/25 83/4 111/23</p> <p>recall [9] 10/21 38/13 57/16 60/25 91/9 98/6 99/20 100/18 107/6</p> <p>receipts [9] 49/19 49/25 51/4 51/11 52/1 58/10 58/20 60/12 65/14</p> <p>receipts/payments [2] 58/20 60/12</p> <p>received [12] 25/7 34/2 73/16 73/19 74/13 76/9 77/1 79/18 100/8 100/14 101/4 122/18</p> <p>receives [1] 1/23</p> <p>receiving [5] 5/8 7/15 35/23 98/17 117/1</p> <p>recent [1] 36/17</p> <p>recently [3] 19/13 20/3 113/1</p> <p>recipient [1] 15/13</p> <p>recognise [1] 87/12</p> <p>recognised [1] 22/18</p> <p>recollection [6] 38/2 75/6 80/1 105/25 106/7 106/9</p>	<p>recollections [2] 80/8 106/10</p> <p>record [1] 40/23</p> <p>recorded [2] 18/14 70/14</p> <p>recording [1] 102/23</p> <p>records [2] 16/4 98/10</p> <p>recover [3] 34/19 35/18 37/14</p> <p>recovers [1] 35/22</p> <p>recreate [1] 91/4</p> <p>redeployed [1] 88/15</p> <p>redo [1] 67/4</p> <p>redone [1] 68/1</p> <p>reduce [1] 33/25</p> <p>reduction [2] 88/8 88/12</p> <p>refer [1] 109/13</p> <p>reference [4] 45/10 56/12 95/11 120/2</p> <p>referred [10] 10/12 12/24 15/14 16/12 38/16 42/20 44/6 59/11 97/19 117/9</p> <p>referring [3] 23/13 53/25 58/23</p> <p>refers [5] 12/10 25/3 27/3 53/14 98/15</p> <p>reflect [2] 37/24 38/2</p> <p>reflection [2] 39/24 56/4</p> <p>reflections [2] 23/3 56/9</p> <p>reflective [1] 27/6</p> <p>refresh [1] 1/13</p> <p>refunded [1] 95/10</p> <p>refuse [2] 2/4 126/9</p> <p>regard [1] 27/21</p> <p>regarding [1] 57/18</p> <p>region [1] 33/17</p> <p>regular [2] 40/16 40/25</p> <p>regularly [1] 88/9</p> <p>reissued [2] 54/20 69/16</p> <p>reissuing [1] 67/20</p> <p>reiterating [1] 16/15</p> <p>rejected [1] 35/14</p> <p>rejecting [1] 36/18</p> <p>relate [1] 63/16</p> <p>related [4] 10/3 10/23 20/22 91/17</p> <p>relates [1] 78/21</p> <p>relating [4] 18/7 18/20 24/1 49/25</p> <p>relation [6] 62/9 63/10 68/15 70/4 70/11 119/25</p> <p>relations [3] 18/5 18/14 24/15</p> <p>relationship [7] 7/20 13/19 46/7 48/13 84/7 84/15 86/8</p>
---	---	---	---	--

R	50/19 61/22 62/7 83/20	retracted [1] 43/14 retracts [1] 43/4 reversal [1] 82/11 review [13] 4/22 5/4 5/6 5/13 8/25 9/6 10/7 10/8 12/1 12/3 13/8 85/17 118/1 reviews [5] 4/24 5/2 5/9 11/24 13/1 revised [1] 105/6 revisit [1] 54/17 rewording [1] 105/2 rewriting [1] 67/19 Richard [4] 100/23 103/15 104/18 107/1 rid [1] 62/21 right [87] 7/6 9/11 9/14 11/6 12/9 17/21 18/16 22/8 25/25 29/16 31/22 39/10 40/22 42/11 44/23 45/4 49/3 49/20 50/2 50/17 51/25 54/8 54/14 54/14 58/17 58/19 58/22 58/24 59/17 60/20 62/13 62/16 62/24 62/24 63/2 63/22 64/1 64/22 64/23 65/5 65/17 66/2 66/5 66/12 69/23 72/21 74/3 74/10 74/18 75/19 79/20 80/25 81/2 84/25 86/21 92/11 92/24 93/8 94/21 101/17 101/23 101/23 101/24 102/8 104/11 105/5 106/16 112/10 112/10 120/4 120/8 120/10 120/16 120/19 121/3 122/1 122/13 123/4 123/12 123/17 124/1 124/21 124/25 125/11 127/1 127/11 127/18 right-hand [3] 25/25 58/17 62/13 rightly [4] 21/23 44/1 83/21 84/5 ring [1] 105/19 ringing [1] 88/4 rings [1] 88/6 risk [8] 36/18 68/6 84/1 84/2 84/3 84/7 86/4 89/7 Rob [2] 41/8 106/21 Robson [1] 93/9 robust [1] 96/7 Rod [18] 1/25 3/8 3/22 4/15 5/13 7/10 15/21 15/23 17/24 18/3 18/6 51/15 86/6 86/13 100/24 104/19 106/24 123/20 Rod's [1] 51/22	RODERICK [2] 1/3 128/2 Rodric [1] 41/3 role [11] 22/2 24/10 24/12 24/14 24/23 25/5 32/22 32/25 53/10 56/5 59/19 roles [1] 31/2 roll [1] 64/18 room [1] 75/25 Rose's [2] 106/11 109/10 Royal [3] 4/23 25/13 67/15 Rule [1] 127/9 run [1] 32/1 run-up [1] 32/1 running [3] 89/17 90/4 116/17 Russell [1] 50/10	100/7 115/10 117/4 122/7 says [24] 3/12 3/16 6/5 7/23 15/16 17/23 18/22 34/21 44/11 50/17 50/23 62/23 65/1 65/12 70/11 85/7 87/17 90/9 90/17 98/9 104/23 105/6 108/16 109/24 scenario [4] 10/25 24/7 24/8 53/2 screen [9] 3/11 58/14 62/10 62/22 62/24 62/25 63/2 70/8 120/7 screens [2] 3/11 111/23 scroll [6] 33/13 41/9 41/20 92/22 106/19 107/12 scrolling [3] 7/22 35/11 42/7 SDM [1] 60/5 searched [1] 81/25 second [11] 1/14 1/23 4/20 7/24 9/9 10/23 11/3 27/2 50/8 65/11 70/12 Second Sight [1] 10/23 secondly [3] 8/16 9/12 34/25 section [1] 15/11 sections [1] 71/21 secure [1] 30/3 securing [1] 30/9 security [26] 6/14 6/17 6/18 6/20 41/8 59/13 59/14 59/15 60/6 78/7 83/22 83/23 85/9 85/14 85/25 86/19 88/18 89/2 89/4 89/7 89/16 89/18 89/25 90/12 93/22 109/21 see [44] 1/5 1/18 1/19 1/22 12/6 15/10 15/13 15/16 17/22 25/24 27/1 27/2 29/10 31/17 31/23 32/6 38/19 40/9 40/15 41/3 42/4 47/20 49/11 54/5 58/13 58/15 59/11 60/9 62/12 62/18 63/9 63/12 63/15 63/22 74/23 82/6 82/16 85/9 87/17 87/21 87/23 110/25 120/7 126/1 seek [2] 35/14 37/9 seeking [4] 2/10 3/23 4/2 35/3 seem [2] 9/2 88/17 Seema [9] 15/8 17/19 24/23 25/4 26/7 40/10
----------	---------------------------	--	--	--

S	settle [3] 101/24 102/6 102/19	shut [1] 8/12	100/23 103/2 103/4 103/15 106/25 112/9	119/24 120/10 125/15 125/20
Seema... [3] 40/21 119/25 120/13	settled [1] 104/7	side [5] 2/17 51/3 51/10 58/15 58/17	so [201]	sometimes [10]
seems [5] 40/23 57/22 58/7 77/11 104/14	settlement [6] 34/10 99/17 99/21 99/22 100/12 105/4	sided [3] 24/4 24/5 118/1	social [3] 22/12 23/12 75/4	22/21 33/1 44/1 45/23 46/5 46/6 46/22 47/1 48/10 48/15
seen [11] 20/20 24/2 27/10 44/23 67/7 73/20 79/7 110/20 112/2 124/22 126/24	settling [5] 25/12 101/15 101/22 102/10 104/21	Sight [2] 10/23 11/3	solicitor [4] 1/15 7/17 120/22 124/17	somewhat [1] 77/9
send [2] 3/13 122/24	Seventhly [1] 36/6	significant [5] 22/19 94/22 97/15 108/25 111/19	solicitors [20] 6/6 14/2 14/3 14/10 15/19 16/21 16/25 33/24 34/3 40/24 57/8 75/13 75/17 93/17 94/9 94/21 95/7 100/15 125/19 125/25	somehow [4] 10/13 88/13 104/7 115/15
sender [1] 15/12	several [3] 19/5 21/4 46/19	significantly [1] 84/21	solo [1] 116/1	sorry [19] 11/6 11/8 11/9 11/15 11/16 13/22 33/13 50/7 81/17 99/18 100/25 102/22 103/6 104/4 104/4 119/3 125/7 125/8 125/10
senior [9] 28/21 29/1 29/19 59/17 61/13 61/15 103/8 103/19 103/25	shall [1] 49/4	sill [1] 38/8	some [65] 3/18 10/20 18/20 21/19 21/23 22/24 24/17 25/3 28/25 33/14 41/10 41/11 43/1 44/5 44/17 44/24 45/6 46/10 46/12 46/18 47/1 47/5 51/17 52/22 53/15 55/2 58/9 61/23 61/24 61/25 62/18 63/8 63/9 67/7 67/9 71/21 78/21 79/7 86/16 86/23 87/17 88/19 88/20 89/22 90/4 92/6 93/10 94/2 97/12 100/8 101/4 108/8 108/22 109/20 112/17 112/19 112/23 112/25 113/20 116/4 117/11 118/7 123/24 124/2 126/14	sort [21] 29/6 30/19 38/15 43/21 44/10 45/2 47/5 70/6 77/6 85/6 87/5 89/16 89/22 91/5 91/21 92/1 92/22 94/4 110/22 117/8 126/14
seniority [1] 103/13	share [2] 79/2 79/23	similar [9] 29/9 38/4 40/1 40/6 40/13 95/6 103/18 104/15 119/24	sole [1] 116/1	sought [4] 8/16 8/21 9/15 16/5
sense [12] 30/6 53/12 55/13 55/20 60/10 88/22 88/23 89/16 91/8 91/10 91/18 126/16	shared [12] 3/10 6/5 19/6 29/8 61/15 61/19 61/21 62/3 82/19 98/12 100/18 109/9	Simpkins [1] 60/6	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	sound [7] 22/3 29/11 71/4 79/14 83/9 93/20 113/23
sense [12] 30/6 53/12 55/13 55/20 60/10 88/22 88/23 89/16 91/8 91/10 91/18 126/16	shareholder [1] 24/21	simpler [1] 42/25	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	sounding [1] 44/2
seniority [1] 103/13	sharing [1] 80/1	Simplistically [1] 2/3	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	sounds [1] 3/18
sense [12] 30/6 53/12 55/13 55/20 60/10 88/22 88/23 89/16 91/8 91/10 91/18 126/16	she [26] 8/2 19/19 32/23 34/21 73/10 74/13 74/23 75/20 75/21 77/21 77/21 77/22 77/23 82/25 94/1 94/5 94/25 95/5 95/13 96/6 100/7 100/11 101/8 107/11 109/23 121/1	Simply [3] 9/19 28/3 75/20	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	sources [1] 77/19
sensible [1] 5/2	she'd [2] 82/25 101/13	Simpson [1] 59/13	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	space [2] 54/22 55/9
sent [16] 28/22 73/9 73/21 73/22 73/23 74/3 74/4 76/16 77/14 77/23 77/25 93/2 97/13 100/21 102/8 122/10	she's [7] 100/11 101/18 101/18 101/20 101/21 102/8 102/9	since [5] 35/16 64/13 76/12 97/1 99/9	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	speak [4] 44/7 73/2 91/2 91/19
sentiment [2] 28/10 113/10	Shoosmiths [1] 18/12	Singh [19] 1/17 1/20 17/12 17/23 25/24 26/9 29/13 29/15 41/4 121/6 121/8 121/22 122/3 123/6 123/9 123/16 123/25 124/14 126/5	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	speaking [4] 74/20 75/16 89/20 117/6
sentiments [2] 71/2 71/5	short [3] 36/5 49/9 94/5	Singh's [1] 7/22	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	speaks [2] 46/24 46/24
separate [2] 14/5 14/6	should [47] 2/20 3/15 5/6 5/21 5/22 5/23 7/16 14/1 14/3 16/19 16/19 17/7 28/2 29/3 29/15 30/17 31/7 37/3 39/21 46/19 55/5 61/18 64/25 66/7 66/8 68/1 68/2 69/13 69/16 69/17 69/20 82/20 99/7 114/10 120/15 121/10 121/21 123/8 123/15 124/13 124/14 124/18 124/18 126/8 126/8 126/18 127/11	single [2] 4/11 26/22	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	specialist [2] 96/19 99/1
separation [1] 25/14	shouldn't [3] 28/1 30/20 125/20	sir [10] 1/5 48/23 49/11 57/2 72/24 119/19 119/20 127/16 127/21 128/10	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	specific [5] 31/6 55/23 68/23 92/9 92/11
September [5] 15/5 51/5 51/12 52/16 68/6	show [4] 11/19 53/4 54/11 64/11	six [4] 49/22 61/21 62/7 111/22	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	specifically [1] 80/6
September 2003 [1] 68/6	showed [3] 53/5 98/6 99/12	sixth [3] 52/11 62/11 62/14	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	specified [2] 3/4 52/9
September 2010 [1] 51/5	shows [2] 65/8 118/7	sixthly [1] 36/1	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	specify [1] 4/9
series [6] 40/15 40/16 41/16 42/8 54/5 85/3	shredding [1] 78/10	size [3] 36/10 36/12 36/16	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	split [1] 83/22
serve [1] 34/5		skills [2] 24/19 89/22	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	spoke [3] 46/1 61/24 75/21
served [1] 127/9		skip [1] 36/20	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	spoken [5] 15/22 73/5 74/24 75/1 76/12
service [6] 50/11 50/13 59/5 59/11 108/9 112/23		Skipping [1] 34/24	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	spurious [1] 36/2
Services [1] 41/7		slice [1] 28/23	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	stack [1] 107/19
session [4] 64/18 80/15 127/8 127/14		slide [1] 118/7	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	staff [2] 68/13 97/6
set [10] 1/16 23/25 26/23 28/7 48/23 55/2 94/7 96/7 113/16 113/16		slides [1] 118/8	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	stage [8] 33/10 50/12 81/1 81/9 92/17 96/10 97/15 120/14
set-up [1] 55/2		slight [1] 125/23	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	Stakeholder [1] 24/15
sets [3] 64/3 94/25 100/11		slightly [4] 64/5 77/2 77/11 104/16	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	stakeholders [1] 24/17
settings\Jarnail.a.singh [1] 63/3		slow [1] 111/24	somebody [29] 10/16 14/12 20/20 21/13 22/19 25/16 43/12 46/1 46/4 46/23 46/24 46/24 46/25 47/10 47/13 48/21 50/11 50/19 59/2 69/9 71/18 85/6 88/14 89/5 90/2 90/20 91/4 95/23 114/21	standard [7] 26/21 34/12 35/16 35/17 36/19 90/18 90/23

S	116/11 117/2 117/3 117/14 118/18 119/1	28/16 30/17 30/24 31/5 31/9 33/20 35/10 47/3 56/16 56/21 57/11 57/18 57/22 58/7 61/10 65/14 66/8 67/2 69/1 69/2 69/5 69/9 69/24 70/17 71/19 74/7 94/13 94/16 94/17 95/3 95/16 96/12 96/21 97/1 97/7 97/8 98/19 99/9 105/13 105/16 107/8 107/10 110/11 112/15 114/23 114/24 115/25 117/16 117/17 118/5	23/9 23/22 25/12 29/1 32/11 32/12 32/15 32/21 32/22 33/3 33/4 33/8 43/16 45/24 50/20 51/13 52/20 59/18 60/4 61/13 61/16 61/24 72/10 83/22 83/25 84/2 84/3 84/10 84/11 84/12 84/12 84/16 85/8 85/11 85/11 85/20 86/2 86/5 86/9 86/10 88/15 88/18 88/19 89/12 90/4 90/21 93/19 96/14 107/19 108/18 108/22 113/8 113/12 113/17 113/20 118/2 118/20 118/21 119/5 119/8 121/6	71/8 72/21 80/21 82/5 86/15 99/19 100/20 111/16 114/11 114/12 119/15 119/17 119/23 127/1 127/2 127/3 127/21
standing [1] 90/5	subsequently [3] 49/18 73/23 78/8	system's [1] 66/13	thanks [3] 107/15 107/15 127/20	
start [7] 32/19 42/14 49/4 50/5 65/1 82/12 98/18	successful [2] 35/18 107/4	systems [7] 7/2 8/20 9/19 9/22 23/7 69/21 70/13	that [748]	
started [3] 44/15 45/6 120/12	such [9] 21/22 24/17 35/4 39/15 48/11 105/20 108/3 110/15 126/24	T	that I [21] 5/6 5/17 11/16 13/5 21/5 23/1 30/5 62/3 68/19 68/22 72/2 75/24 78/11 83/15 88/7 105/14 108/16 113/19 116/19 123/15 125/18	
starting [1] 55/3	sued [1] 13/17	table [2] 44/24 56/23	that's [62] 4/16 8/3 10/12 13/22 16/12 21/24 22/6 22/17 27/12 27/16 28/4 28/4 30/5 38/3 38/4 38/5 38/14 39/24 45/6 45/7 47/16 49/3 50/17 51/7 52/17 60/24 62/2 62/12 62/22 62/25 63/11 64/2 68/9 68/17 69/5 72/19 74/1 74/2 75/17 76/11 77/11 79/18 79/22 80/16 82/16 85/1 85/9 93/5 93/8 101/17 104/1 106/21 106/25 112/5 113/5 115/6 117/18 117/25 121/15 125/1 125/11 126/12	
starts [1] 100/7	suggest [8] 27/18 29/4 49/23 85/10 89/1 99/11 104/24 124/3	take [13] 36/11 38/10 38/11 39/22 42/1 48/24 54/15 58/11 70/3 79/13 79/15 85/21 90/13	technical [2] 60/7 60/8	
stated [2] 20/11 94/10	suggested [4] 69/20 105/1 105/6 117/22	taken [4] 41/15 99/16 99/18 109/20	technicalities [1] 107/12	
statement [12] 23/2 35/4 56/9 68/5 69/19 105/2 105/21 106/8 106/12 109/10 110/21 110/22	suggesting [6] 7/16 38/7 71/15 71/17 104/20 120/14	taking [1] 40/5	techniques [1] 96/16	
statements [7] 34/5 51/21 90/13 90/18 90/23 97/6 105/17	suggestion [4] 26/22 98/24 99/6 99/10	Talbot [10] 17/12 17/22 31/17 38/20 93/4 93/11 104/14 104/25 106/18 106/20	technology [2] 1/11 41/11	
starting [3] 34/18 35/13 126/15	suggestions [2] 29/22 96/6	Talbot's [1] 98/24	telephone [1] 45/24	
statistics [1] 97/2	suggests [1] 99/13	talk [4] 20/21 53/22 116/13 116/19	tell [1] 14/22	
stay [2] 62/8 94/2	sum [4] 34/10 37/6 81/3 105/9	talked [3] 21/18 25/9 117/2	telling [1] 121/7	
Stein [4] 57/2 57/4 57/5 128/6	summaries [1] 63/9	talking [12] 22/16 42/17 55/18 61/23 63/16 63/22 69/11 91/22 113/4 113/5 117/20 118/9	temp [1] 34/14	
Stephen [3] 38/25 39/17 104/19	summarising [1] 94/4	talks [2] 95/5 95/13	template [7] 91/8 91/11 91/15 91/15 91/21 92/8 92/9	
stepped [1] 56/19	summary [3] 20/22 55/22 91/20	Tatford [2] 1/21 26/17	templates [3] 91/1 91/3 91/13	
steps [1] 64/11	summation [2] 13/3 20/3	tax [1] 43/3	tenure [1] 108/23	
Stewart [1] 60/5	supplied [1] 95/2	taxed [1] 39/9	term [1] 61/6	
still [11] 15/7 33/2 37/2 51/17 64/11 72/7 87/10 92/17 98/20 98/22 123/25	supply [1] 112/24	team [104] 2/15 2/21 2/23 2/25 3/6 4/4 4/7 4/20 4/25 5/3 5/11 5/14 5/21 6/3 6/14 6/17 6/18 6/21 6/23 7/5 7/9 7/19 9/1 9/7 9/25 11/22 11/24 12/1 12/4 12/25 13/1 13/17 13/20 13/25 14/6 14/22 14/23 16/7 16/8 17/5 17/6 20/25 22/23	termination [1] 96/11	
stood [1] 54/21	support [3] 41/12 90/14 90/15	target [2] 88/12 116/2	terminology [1] 101/21	
stop [1] 122/1	supported [1] 34/8	targets [1] 84/6	terms [6] 6/17 45/10 56/12 103/13 112/19 125/5	
story [7] 18/7 18/16 18/17 18/19 18/23 20/8 23/25	supporting [1] 107/18	Tatford [2] 1/21 26/17	testimony [2] 80/2 80/4	
straightforward [1] 26/13	suppose [2] 11/23 63/23	tax [1] 43/3	text [1] 105/6	
strangely [1] 25/24	supposed [1] 30/1	taxed [1] 39/9	texted [1] 75/16	
strategy [1] 39/25	suppressing [1] 117/22	team [104] 2/15 2/21 2/23 2/25 3/6 4/4 4/7 4/20 4/25 5/3 5/11 5/14 5/21 6/3 6/14 6/17 6/18 6/21 6/23 7/5 7/9 7/19 9/1 9/7 9/25 11/22 11/24 12/1 12/4 12/25 13/1 13/17 13/20 13/25 14/6 14/22 14/23 16/7 16/8 17/5 17/6 20/25 22/23	than [13] 8/17 9/18 9/21 23/24 45/25 46/20 58/3 72/17 74/9 86/19 93/6 103/25 116/5	
strong [1] 90/11	sure [16] 10/15 13/20 45/16 46/10 46/17 47/9 55/25 60/23 69/17 83/2 83/6 83/14 100/3 122/22 124/19 125/15	talks [2] 95/5 95/13	thank [38] 1/6 1/7 1/12 7/23 14/24 25/23 31/16 33/13 38/19 42/7 48/22 49/7 49/12 49/13 50/7 56/2 56/24 57/1 58/12 68/18 71/7	
structurally [1] 23/8	surprised [2] 2/25 4/3	target [2] 88/12 116/2	thank [38] 1/6 1/7 1/12 7/23 14/24 25/23 31/16 33/13 38/19 42/7 48/22 49/7 49/12 49/13 50/7 56/2 56/24 57/1 58/12 68/18 71/7	
structure [2] 91/6 91/16	surprisingly [1] 120/20	targets [1] 84/6	them [29] 20/19 26/4 33/9 36/3 36/9 39/9 41/18 41/20 42/14 42/15 43/7 46/3 46/4 52/12 52/13 58/3 67/8 86/13 89/12 90/14 90/22 96/15 102/15 113/23 114/9 115/22 115/24 119/7 125/20	
stuff [6] 21/8 40/6 42/25 55/14 60/24 91/1	suspect [1] 34/7	Tatford [2] 1/21 26/17	theme [1] 88/6	
subject [5] 5/4 15/7 26/7 27/25 28/2	sync [2] 70/13 112/19	tax [1] 43/3	themselves [4] 31/14 93/19 115/13 117/3	
submitted [2] 2/17 109/23	system [68] 8/25 9/3 9/8 9/10 9/15 9/24 11/12 12/21 13/14 20/17 21/3 21/10 21/15 22/25 23/10 26/14 27/19 27/21	taxed [1] 39/9	then [65] 1/18 3/24 5/15 6/22 17/7 19/18 21/23 32/14 35/11 35/17 36/20 36/22 41/4 41/8 41/9 41/14 41/16 41/18 42/7 44/10 46/24 59/24 61/23 62/7 62/16	
subpostmaster [8] 10/17 11/1 21/1 107/24 108/9 108/20 118/14 119/13	system [68] 8/25 9/3 9/8 9/10 9/15 9/24 11/12 12/21 13/14 20/17 21/3 21/10 21/15 22/25 23/10 26/14 27/19 27/21	team [104] 2/15 2/21 2/23 2/25 3/6 4/4 4/7 4/20 4/25 5/3 5/11 5/14 5/21 6/3 6/14 6/17 6/18 6/21 6/23 7/5 7/9 7/19 9/1 9/7 9/25 11/22 11/24 12/1 12/4 12/25 13/1 13/17 13/20 13/25 14/6 14/22 14/23 16/7 16/8 17/5 17/6 20/25 22/23		

T	thing [19] 11/24 28/12 30/19 38/5 52/21 55/23 56/17 56/23 61/17 67/10 69/11 74/1 88/22 89/19 98/16 99/24 110/23 112/5 119/14	86/13 88/8 117/16 119/10 125/10 ticketing [1] 45/25 ties [1] 90/11 time [43] 4/22 6/11 6/12 6/16 10/14 12/20 13/9 19/9 24/23 27/6 27/24 28/11 29/2 32/10 33/7 42/18 44/10 46/21 49/4 52/7 53/1 60/17 67/6 67/21 73/22 74/4 74/14 75/21 76/10 78/11 82/4 84/21 86/16 86/17 87/10 98/13 104/15 106/17 107/20 110/24 115/8 116/24 119/9	126/24 training [3] 64/17 66/6 96/14 transact [2] 43/23 43/25 transaction [6] 33/7 43/20 46/2 55/4 118/18 118/22 transactions [6] 21/2 21/16 42/24 73/11 74/16 90/1 transcript [1] 111/21 transformation [1] 5/1 Transit [1] 108/10 tray [1] 43/13 trays [2] 43/11 45/20 tremendous [2] 37/15 37/22 trial [7] 17/20 17/25 20/6 26/8 26/10 32/1 37/2 tried [7] 23/18 53/1 54/21 54/25 76/2 79/13 79/15 true [3] 25/18 76/8 106/8 Trundell [1] 59/24 trust [1] 115/14 trusting [1] 111/7 try [3] 21/20 54/24 101/7 trying [11] 14/7 14/7 22/1 42/23 46/8 53/23 80/19 87/21 100/2 106/7 119/4 Tuesday [3] 127/17 127/19 127/24 turn [4] 13/14 14/24 25/21 104/12 turned [1] 26/12 turning [1] 49/21 turns [3] 13/16 44/11 110/9 twice [2] 37/16 37/23 Twitter [1] 79/8 two [18] 2/14 4/17 7/21 8/22 12/23 18/25 35/25 37/18 38/16 74/13 83/23 84/3 90/3 91/8 91/18 96/21 97/7 119/21 type [2] 10/7 78/1 types [2] 71/1 71/4	un [1] 69/2 un-updated [1] 69/2 unaltered [1] 69/5 unanswered [1] 51/17 unattended [1] 109/18 unbalanced [2] 24/4 24/5 uncontaminated [3] 75/5 75/25 79/4 under [10] 44/21 64/4 65/11 70/9 113/2 113/7 122/3 124/16 124/17 125/24 underneath [3] 43/13 54/12 63/4 understand [16] 3/24 9/17 11/13 54/23 75/19 80/17 101/7 102/5 102/7 120/12 121/7 123/23 126/3 126/11 126/12 127/12 understandable [1] 46/23 understanding [19] 13/24 21/8 21/14 21/15 22/4 22/20 23/21 37/25 44/16 44/17 46/18 48/12 66/18 72/15 75/11 80/14 90/1 110/14 120/8 understandings [1] 89/23 understood [4] 2/9 116/24 125/3 125/16 unfortunate [2] 18/2 20/5 unfounded [6] 115/2 115/3 115/8 115/10 115/12 115/18 unless [1] 95/9 unparalleled [1] 26/15 unpleasant [5] 27/12 27/16 28/4 28/20 29/9 unprecedented [2] 26/14 27/20 unreasonable [1] 88/17 unreliability [1] 11/20 unsatisfactory [3] 67/17 68/24 114/6 until [3] 110/20 127/19 127/23 unusually [1] 22/3 up [31] 1/8 4/23 7/22 11/17 16/12 21/5 25/13 32/1 51/16 52/22 54/3 54/11 55/2 67/15 71/21 80/22 87/18 87/25 88/11
then... [40] 62/18 63/4 63/5 63/17 64/22 65/9 66/23 70/3 76/8 77/1 81/3 81/3 81/15 85/8 85/15 88/3 88/20 89/9 90/17 92/7 94/1 95/4 98/3 98/16 99/14 100/11 101/7 103/3 105/1 106/19 111/7 122/2 122/20 123/18 123/24 125/23 126/9 126/13 127/8 127/18	things [67] 2/14 3/16 10/20 11/16 12/24 16/13 18/21 21/18 22/4 22/20 22/24 23/3 23/11 23/19 25/19 28/17 30/4 32/24 37/21 42/23 43/1 43/7 43/10 43/16 43/21 43/24 44/5 44/19 44/24 45/3 46/7 46/20 48/2 53/2 53/14 55/3 56/18 60/25 63/4 63/10 67/13 67/14 67/23 68/19 69/22 72/8 73/6 75/3 76/2 79/7 79/8 79/9 86/5 86/7 89/21 91/3 104/3 108/21 113/6 113/7 113/9 113/20 117/12 117/19 118/8 119/9 119/12	timeline [2] 11/4 11/17 timely [1] 118/17 times [7] 12/24 21/4 33/1 67/3 79/11 102/23 109/14 tired [1] 13/15 title [4] 24/14 27/1 28/1 28/3 titled [1] 62/12 today [2] 15/22 49/1 together [10] 20/22 34/6 36/24 45/3 46/14 46/21 47/14 48/11 60/10 84/4 told [7] 2/9 5/7 8/11 73/10 78/19 82/18 108/13 tone [6] 29/9 29/12 38/15 40/1 40/6 56/11 Tony [4] 51/3 92/4 93/9 107/1 too [2] 97/6 100/2 took [5] 54/16 73/8 84/20 85/25 119/9 top [11] 1/18 1/22 25/25 28/23 43/6 58/14 58/14 62/12 64/25 87/13 126/22 Topham [1] 15/10 topic [5] 10/3 44/23 49/14 52/11 52/14 topics [3] 46/18 48/24 52/9 total [1] 39/7 totally [2] 30/5 118/13 touch [2] 42/25 118/20 touching [1] 47/17 towards [1] 96/10 Tracy [2] 80/22 82/23 trade [1] 37/7 traditionally [1] 35/18 trail [2] 126/18	there [135] there'd [2] 31/4 47/18 there's [25] 3/18 6/20 10/11 19/5 21/19 23/13 25/1 25/2 28/16 29/5 31/12 33/12 41/16 47/21 52/14 56/14 60/23 84/15 88/3 101/21 103/14 111/9 112/5 115/6 118/24 thereby [1] 27/10 therefore [14] 5/4 7/5 9/4 10/24 19/8 19/11 23/11 36/18 53/20 65/15 79/13 84/3 90/2 121/18 these [31] 22/15 22/24 23/23 25/15 29/10 42/8 42/13 45/3 46/18 53/2 74/19 77/6 83/3 85/10 91/25 92/25 94/20 98/6 98/8 98/13 102/8 102/9 104/8 106/11 112/5 115/12 116/18 116/20 117/4 121/2 124/24 they [63] 6/15 8/20 14/2 14/11 15/19 18/8 30/3 31/13 34/4 34/10 34/13 34/16 34/18 36/11 44/2 44/3 45/25 46/1 46/3 46/13 55/18 56/22 61/17 65/10 65/16 65/23 71/19 74/17 76/2 79/25 81/5 81/7 81/22 81/23 81/24 81/25 82/20 88/24 90/19 91/7 91/10 94/11 94/13 94/17 95/7 95/10 96/24 101/25 103/18 108/6 109/20 109/24 109/25 110/15 113/6 113/7 116/2 116/15 117/15 117/16 124/18 126/1 126/2 they'd [2] 58/3 67/11 they're [4] 14/11 14/14 48/7 56/24	Thirdly [2] 9/15 35/6 this [209] those [29] 8/18 17/15 27/14 33/22 38/16 40/12 43/21 44/1 48/2 55/8 67/7 70/22 71/1 71/4 74/9 76/3 77/19 78/12 79/17 89/20 89/22 104/3 111/23 113/5 113/9 114/8 117/6 120/2 124/4 though [1] 5/22 thought [11] 16/23 27/24 49/1 55/1 57/23 57/25 67/16 79/20 91/23 91/24 105/12 thoughts [5] 55/25 76/1 108/12 110/18 110/23 three [4] 1/16 103/14 103/22 120/24 through [28] 1/17 4/11 6/22 21/21 26/16 26/18 29/17 31/3 43/20 44/19 45/25 46/7 53/2 53/19 54/24 55/7 59/1 63/1 64/5 65/5 81/3 81/25 84/7

U
up... [12] 92/22 96/7
 100/1 105/25 106/19
 107/12 118/11 118/17
 118/25 119/4 119/10
 120/7
update [4] 15/18
 15/24 18/9 28/3
updated [1] 69/2
updates [1] 20/2
upon [5] 39/22 70/19
 96/20 96/24 100/10
upshot [1] 68/25
urgent [11] 8/1 8/6
 8/9 100/10 101/2
 101/2 101/2 101/3
 101/6 101/9 101/14
us [18] 1/11 18/5
 31/23 34/13 34/16
 34/18 35/2 35/4 38/11
 40/5 55/4 60/20 63/10
 78/19 82/18 90/19
 114/22 119/9
use [12] 21/25 28/20
 37/12 37/15 37/20
 37/22 39/16 90/15
 92/2 102/5 108/13
 110/13
used [13] 9/25 21/23
 27/19 28/5 32/24 38/3
 38/5 71/10 82/20 85/9
 91/25 113/19 115/1
user [4] 82/19 109/5
 109/11 116/5
users [1] 117/15
using [5] 9/1 27/12
 28/14 64/24 117/17
utility [1] 114/15
Utting [8] 78/16 87/5
 90/9 91/12 91/23 93/9
 97/14 107/1

V
valid [2] 3/5 97/3
validate [1] 97/7
validity [3] 33/19
 95/2 95/15
valuable [1] 35/4
value [1] 64/15
van [2] 73/21 74/20
van den Bogerd [1]
 73/21
variety [2] 42/9 63/4
various [2] 107/23
 120/16
verbal [1] 98/22
version [2] 12/13
 54/11
very [37] 1/7 3/5 5/10
 10/25 17/24 19/3 19/6
 19/7 19/13 21/1 22/1
 28/11 35/4 49/12
 49/13 56/24 57/13

62/20 70/9 80/21
 81/11 81/22 84/8
 94/22 99/19 100/8
 101/3 101/4 108/24
 113/23 114/12 118/24
 119/7 119/15 125/24
 127/3 127/21
vibe [1] 117/1
view [6] 19/19 48/9
 48/18 106/3 110/7
 110/7
vindicated [1] 107/9
visibility [1] 47/18
visits [1] 4/10
voice [2] 29/12 56/11

W
wages [1] 34/16
wait [2] 114/7 126/1
want [21] 10/10
 18/19 19/11 23/25
 30/23 31/5 31/9 31/23
 34/13 34/16 34/18
 71/13 78/2 79/14
 79/20 79/24 114/22
 116/6 119/21 120/6
 120/7
wanted [7] 4/18
 18/17 24/5 107/25
 115/22 115/24 116/4
wanting [1] 79/3
Ward [1] 107/1
Wardle [2] 104/18
 106/20
Warwick [1] 26/17
was [356]
was sent [1] 93/2
wasn't [31] 4/15 4/21
 5/12 5/17 9/19 10/11
 20/10 21/9 25/6 25/9
 25/16 28/14 29/2
 30/21 38/12 46/15
 52/12 69/9 71/19
 78/10 78/15 82/12
 86/3 91/14 97/21
 98/21 104/6 109/13
 114/23 115/7 123/24
watched [2] 80/16
 107/23
way [22] 1/17 5/23
 30/21 31/24 45/6 52/5
 53/22 74/8 75/3 82/6
 82/7 84/17 84/23 85/4
 85/10 90/3 104/21
 105/17 114/3 121/5
 121/23 125/4
we [177]
we'd [3] 32/17 46/10
 111/12
we'll [7] 55/24 62/18
 64/6 106/19 115/14
 125/25 127/18
we're [16] 2/3 15/5
 31/20 39/4 40/21

48/25 49/21 63/15
 63/22 75/19 86/25
 93/5 114/6 117/19
 119/2 127/16
we've [20] 3/14 17/17
 21/25 23/1 25/1 25/8
 40/2 42/16 44/23
 46/17 60/10 63/2
 63/13 70/10 87/3
 101/20 107/23 108/8
 123/22 123/23
weaponisation [1]
 29/7
weaponise [1] 29/3
weaponised [1] 38/8
week [7] 12/14 13/3
 14/16 17/25 18/10
 36/5 63/23
weeks [1] 124/2
well [70] 3/4 3/18 6/6
 6/8 6/24 8/5 14/17
 14/21 19/9 21/24
 23/14 25/5 27/23
 28/19 32/10 32/17
 32/18 45/6 47/24
 52/18 53/8 53/18
 54/11 56/7 56/19 62/6
 62/6 68/1 68/9 69/17
 71/22 72/2 73/15
 73/25 74/3 77/24
 79/10 80/10 83/12
 84/19 86/3 89/3 92/3
 92/11 93/9 98/2 99/4
 101/15 102/20 103/1
 103/4 104/2 106/13
 107/5 108/24 112/7
 113/16 114/20 115/7
 115/13 116/17 117/4
 120/11 122/1 122/13
 123/19 125/2 125/22
 125/24 126/5
went [8] 52/13 61/25
 81/21 82/7 108/19
 109/24 118/2 118/5
were [135]
weren't [10] 5/19
 6/15 16/2 44/24 86/5
 91/12 109/1 109/6
 116/2 124/4
what [122] 2/2 2/7
 3/21 4/9 4/19 5/14
 5/22 6/3 6/7 9/17
 13/17 14/22 16/10
 16/19 16/22 19/15
 19/24 24/10 27/17
 27/24 30/6 30/12 32/8
 32/15 38/10 42/15
 47/15 49/3 49/18
 51/17 52/5 52/18
 52/20 52/25 53/3 53/4
 53/8 54/15 54/16 55/5
 55/5 55/10 55/18
 55/21 55/22 55/25
 55/25 58/6 59/19 63/1

63/1 64/4 64/8 65/19
 66/7 69/6 69/14 70/14
 71/14 73/15 74/23
 75/11 75/20 75/25
 76/2 76/22 77/1 77/9
 78/1 79/5 79/25 80/1
 81/5 81/5 81/8 81/12
 82/16 82/21 82/23
 83/2 83/6 83/8 83/10
 83/16 86/6 87/17 89/4
 92/6 93/12 95/11 98/2
 98/6 98/24 99/6 99/10
 99/14 99/25 101/17
 102/24 103/16 104/6
 107/22 108/10 108/18
 108/21 109/19 110/17
 110/21 113/4 113/5
 115/9 115/20 116/21
 116/23 116/23 121/7
 122/13 122/15 124/1
 125/16 126/15 126/19
what's [4] 65/19
 67/25 88/6 127/9
whatever [2] 2/16
 121/14
wheel [1] 91/4
when [34] 3/20 3/24
 10/16 11/3 23/1 25/9
 31/6 42/13 42/14 44/3
 44/12 44/14 45/5
 55/13 60/20 60/23
 63/10 64/10 66/25
 72/5 73/20 74/19
 77/21 78/12 78/15
 83/5 83/22 85/5 86/4
 109/24 113/11 118/4
 119/8 122/4
where [34] 1/9 10/22
 19/1 21/20 23/16
 40/20 43/4 43/9 43/11
 45/21 46/8 46/11
 46/16 54/22 55/17
 56/22 58/1 70/20 81/7
 87/21 90/24 96/12
 100/7 102/6 109/15
 109/19 111/10 112/6
 112/24 114/23 115/1
 117/9 118/8 118/23
whereas [2] 65/8
 65/23
whether [30] 2/12
 16/17 29/18 31/23
 32/17 48/16 48/24
 51/7 51/8 55/12 70/1
 70/5 71/23 75/21
 85/18 85/20 86/1
 88/24 91/23 96/24
 97/1 98/18 102/19
 104/2 106/7 114/9
 118/21 121/10 121/20
 125/19
which [66] 3/4 3/8
 5/1 5/5 5/10 7/17
 10/18 12/10 13/4

17/25 20/25 23/1 25/7
 25/8 27/11 27/19
 28/10 35/14 36/24
 39/8 39/9 39/19 42/20
 42/23 43/17 48/9
 55/20 69/8 69/24 70/7
 71/23 72/12 73/10
 74/6 77/4 77/25 79/9
 80/18 84/17 84/22
 86/17 86/22 87/2 87/4
 89/16 92/25 93/2 97/7
 97/19 97/20 104/13
 105/10 106/14 109/8
 109/9 109/19 112/7
 112/18 117/10 120/2
 120/3 120/23 121/23
 124/2 124/23 127/10
while [4] 37/2 67/11
 69/12 71/9
whilst [5] 12/11
 24/25 105/11 107/7
 117/8
white [1] 124/13
who [64] 1/23 4/12
 6/10 6/12 9/1 10/16
 14/6 18/6 20/15 20/20
 21/5 21/10 21/13 23/6
 24/3 24/10 25/16 27/8
 27/18 33/1 39/22 44/7
 46/1 46/11 46/24
 46/25 47/11 47/12
 47/13 48/6 50/10
 50/12 50/16 50/19
 53/21 56/20 61/20
 61/21 61/24 62/7 69/9
 71/18 72/22 76/9
 79/23 82/20 83/12
 89/10 93/2 96/19 99/1
 101/7 105/25 111/12
 115/10 116/17 116/22
 117/2 117/3 117/5
 117/14 117/15 119/6
 123/10
who'd [2] 22/19
 48/13
whoever [2] 103/8
 126/7
whole [5] 6/20 7/7
 23/12 33/19 67/18
wholly [1] 114/5
whom [2] 47/8 50/18
whose [1] 73/25
why [34] 5/17 6/22
 12/2 13/8 19/16 21/9
 22/6 22/22 23/10
 23/17 29/13 29/19
 31/4 47/23 48/3 56/16
 66/24 67/4 69/9 71/12
 71/18 71/23 71/25
 72/19 77/10 78/3 80/2
 80/8 83/4 91/4 97/9
 117/25 123/24 126/9
widely [1] 70/16
will [29] 26/23 28/7

<p>W</p> <p>will... [27] 37/6 37/9 37/12 37/15 37/20 37/21 39/15 50/9 64/11 64/16 65/9 65/13 65/15 70/13 73/20 78/25 79/23 85/17 85/22 90/25 96/2 96/5 96/13 111/22 119/12 119/12 121/1</p> <p>Williams [3] 41/3 119/20 128/10</p> <p>Wilson [1] 106/21</p> <p>win [1] 30/9</p> <p>Wincor [2] 44/7 45/19</p> <p>Winn [12] 1/23 2/7 3/20 8/11 15/21 15/22 60/3 80/5 111/18 122/17 122/23 123/1</p> <p>Winn's [3] 12/6 80/2 80/16</p> <p>Winn/Rod [1] 15/21</p> <p>wish [4] 10/5 18/7 29/21 123/10</p> <p>wishing [3] 8/12 8/19 30/13</p> <p>withdraw [1] 105/17</p> <p>withdraws [1] 35/9</p> <p>within [27] 6/15 7/11 10/9 11/14 12/14 15/11 20/15 28/21 28/23 29/3 29/19 42/9 42/18 43/11 45/20 50/19 56/21 59/4 59/9 61/15 62/12 64/12 64/18 66/7 69/2 90/12 116/25</p> <p>witness [9] 23/2 56/9 69/19 80/13 80/15 90/13 92/1 92/7 107/19</p> <p>witnesses [8] 73/3 73/5 76/6 91/25 92/5 102/23 120/15 120/21</p> <p>won [1] 40/2</p> <p>won't [1] 100/2</p> <p>wonder [1] 48/24</p> <p>wondered [1] 87/12</p> <p>wondering [2] 71/18 98/18</p> <p>word [1] 91/15</p> <p>wording [1] 105/1</p> <p>words [5] 28/1 58/5 85/24 113/18 122/15</p> <p>work [13] 6/12 22/14 26/17 35/3 36/24 87/8 87/18 88/15 107/17 114/21 115/25 117/11 119/9</p> <p>worked [9] 1/17 6/10 47/15 50/12 57/23</p>	<p>68/9 80/5 87/25 111/11</p> <p>working [10] 2/3 10/18 53/19 54/24 55/6 66/13 92/5 114/23 114/24 118/25</p> <p>workload [1] 11/23</p> <p>world [1] 30/14</p> <p>worried [1] 114/14</p> <p>would [168]</p> <p>wouldn't [10] 7/18 8/14 8/16 9/6 25/19 111/6 114/22 115/22 115/24 126/10</p> <p>Wright [1] 60/8</p> <p>write [4] 12/17 71/12 117/25 122/7</p> <p>writing [11] 12/12 18/23 39/8 49/22 50/18 69/18 112/2 112/3 112/4 114/2 114/3</p> <p>written [6] 17/14 18/21 19/22 20/17 54/18 126/14</p> <p>wrong [5] 29/5 81/17 109/5 112/25 125/11</p> <p>wrongly [3] 55/16 83/21 84/5</p> <p>wrote [4] 26/9 46/5 49/18 120/23</p> <p>Wyles [2] 104/17 106/20</p> <p>WYN [2] 119/20 128/10</p> <hr/> <p>Y</p> <p>yeah [102] 6/11 6/11 7/2 9/14 11/15 12/15 12/15 15/4 26/1 26/3 26/6 28/25 31/19 31/19 31/25 32/5 32/5 38/17 38/24 40/6 41/13 41/22 41/25 42/6 42/12 52/13 54/8 57/3 57/25 58/16 58/21 58/25 59/6 59/8 59/10 59/10 59/14 59/16 59/21 59/23 60/2 60/4 60/13 60/19 61/11 62/8 63/7 63/25 64/21 65/18 73/14 74/2 74/12 76/21 76/25 77/15 77/18 77/18 77/24 78/18 78/23 80/10 80/10 82/15 82/17 82/22 82/22 86/20 87/9 87/11 87/11 89/15 92/19 92/21 97/22 97/23 98/3 98/23 100/19 102/5 102/13 102/14 102/16 104/9 104/10 112/13 120/19</p>	<p>121/4 121/15 121/17 123/2 123/2 123/2 123/3 123/14 124/7 124/7 125/1 125/7 125/17 126/12 126/25</p> <p>year [6] 6/19 46/2 60/18 67/21 72/4 92/15</p> <p>years [9] 11/7 11/11 31/20 38/6 75/9 75/12 75/14 76/3 78/9</p> <p>yes [117] 1/6 4/22 8/23 11/6 11/8 11/9 15/9 15/15 17/16 17/18 21/13 22/17 26/1 28/25 29/18 30/7 30/11 30/22 31/12 32/7 38/9 38/22 40/12 40/13 41/5 41/6 41/6 42/12 47/22 47/22 49/12 50/4 52/4 54/4 54/4 57/15 57/15 58/8 58/9 58/18 59/3 59/5 59/23 60/4 63/19 63/21 65/4 66/1 66/4 66/9 66/11 68/8 69/14 71/5 72/22 73/13 73/18 73/19 74/11 76/21 77/12 77/14 77/15 77/17 77/22 78/17 78/18 81/20 81/22 81/22 82/13 82/14 87/7 87/7 87/9 87/10 87/22 92/18 92/25 93/8 94/23 94/24 98/16 100/18 101/11 101/20 102/2 102/3 103/5 106/23 109/2 109/2 109/2 109/7 111/3 111/3 111/20 111/21 111/25 111/25 113/5 114/19 115/16 119/23 120/5 121/11 122/18 122/22 125/1 125/9 125/14 125/17 126/4 126/20 126/25 127/12 127/16</p> <p>yesterday [17] 4/17 13/5 29/8 57/18 73/9 73/14 73/17 88/8 90/8 97/18 99/23 99/25 100/19 111/23 113/19 117/9 120/3</p> <p>you [357]</p> <p>you'd [2] 32/13 44/8</p> <p>you'll [13] 1/15 15/13 15/16 17/22 27/1 27/2 31/17 32/6 47/20 57/16 67/6 78/20 127/9</p> <p>you're [13] 15/12 32/6 44/23 50/24 53/25 58/5 58/6 83/10 92/17 92/20 97/14</p>	<p>102/15 113/13</p> <p>you've [31] 3/21 6/4 13/1 17/14 19/6 20/9 23/24 25/4 31/7 31/24 38/5 38/16 47/14 47/14 58/9 60/14 63/5 70/1 71/2 78/19 82/18 102/6 105/25 112/12 118/6 118/7 119/25 121/7 125/3 125/11 126/15</p> <p>Young [1] 68/10</p> <p>your [64] 1/13 2/9 2/12 3/13 3/17 6/6 6/15 6/22 8/1 8/6 8/9 10/9 11/18 12/12 12/12 12/19 14/14 14/20 15/2 17/14 20/17 24/23 37/24 50/19 54/18 56/5 57/11 57/18 57/21 65/1 66/5 66/24 68/4 68/15 70/4 73/3 73/4 74/4 74/5 74/16 77/13 77/14 78/6 82/3 83/13 84/21 86/16 86/17 102/5 106/19 107/12 107/16 111/1 111/2 112/1 112/3 112/7 112/8 112/11 113/13 114/16 117/22 122/25 125/5</p> <p>yours [2] 76/23 80/9</p> <p>yourself [2] 39/6 68/11</p> <hr/> <p>Z</p> <p>Zoe [1] 15/10</p> <p>zoom [3] 80/21 85/2 87/16</p>
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