

Tuesday, 11 July 2023

(10.00 am)

Discussion re disclosure issues

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

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

MR BEER: Thank you, sir. As you and the Core Participants know, there have been a series of further unwelcome developments in the disclosure remediation exercise being undertaken by the Post Office to put right errors and mistakes made in the disclosure given by the Post Office in response to our requirements made over the last 18 months or so, that it must disclose to us documents which are relevant to our terms of reference and list of issues.

When these unwanted events emerged at the end of last week, you took two decisions. Firstly that all of the correspondence that the Post Office had sent to the Inquiry in relation to the unfolding tale should be disclosed to the Core Participants so that they understood firsthand what the Post Office was, piece by piece, revealing to the Inquiry.

Second, that all Core Participants should

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a moment the Inquiry understands that the disclosure issues do not significantly affect the witnesses to be called in the week commencing 24 July. That is those witnesses who give evidence about the civil proceedings brought in connection with the Cleveleys Post Office.

Before giving the floor to the legal representatives of Core Participants, I should outline in general terms what has happened. This is principally for the benefit of those in the room who are not Core Participants, for those watching the proceedings online and for those otherwise following the progress of this Inquiry.

So by way of background, you'll recall, sir, that on the 4 July you heard evidence from the Post Office's general counsel, Mr Ben Foat, concerning the cause of the non-disclosure of a series of relevant documents, which ought to have been disclosed a year ago to this Inquiry but which only came to our attention because they were disclosed to a member of the public following her request under the Freedom of Information Act 2000.

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have the opportunity this morning to make submissions on the issues that have arisen in the light of what the Post Office has disclosed to us since we met together in this hearing room last Thursday.

You've indicated, sir, that you're considering two courses of action. Firstly, to proceed to hear evidence from Andrew Hayward, John Scott, Rob Wilson, Alison Bolsover, James Breeden, Paul Inwood, Thomas Pegler, Alan Lusher and Duncan Atkinson -- that is the witnesses for this week, for next week and one in the following week -- notwithstanding what the Post Office has said about the non-disclosure of documents that may be relevant to the evidence that they will give. You have indicated that, if this course of action was taken, you would not hesitate to recall any of those witnesses in due course if new, relevant documentation was provided that ought to have been put to them.

The second course of action you have said that you're considering is to adjourn those witnesses and to re-list them in the hearing starting after the summer break. I should add that, subject to a point I'll mention in

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The purpose of that hearing, taking evidence from Mr Foat, was not just the narrow one of establishing what had gone wrong and which had led to the non-disclosure of those small number of documents to the Inquiry, it had a wider purpose two: to seek to understand if that instance of non-disclosure was symptomatic of a wider series of problems. Put another way, it was to establish if something was wrong at a system level with the Post Office's disclosure to us.

In that hearing Mr Foat identified three such wider issues in the Post Office's disclosure process, arising from, firstly, its use of search terms, secondly its approach to families of documents and, thirdly, to a de-duplication exercise that it had carried out.

Mr Foat indicated in his evidence that, in the light of these systemic issues -- that's my phrase not his -- that what he described as a disclosure remediation exercise was being undertaken, that the Post Office was:

"... genuinely working through the issues to remediate them as quickly as possible to be

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1 completely transparent with the Inquiry, that we
2 do want to support the Inquiry to be able to
3 continue its work and therefore prioritise the
4 remediation in terms of the witnesses in
5 Phase 4."

6 At that same hearing last Tuesday, you
7 indicated that you may issue directions to
8 ensure that the remaining Phase 4 witnesses were
9 not undermined by the Post Office's disclosure
10 failings.

11 The Post Office sent a letter to the Inquiry
12 on 5 July at 10.32 pm setting out further
13 information on the de-duplication issue insofar
14 as it affected the evidence of Gareth Jenkins.
15 The Post Office identified 4,767 documents that
16 could be potentially relevant to Mr Jenkins who
17 was due to give evidence the following day.

18 That following day, Thursday, 6 July,
19 ie last Thursday, you held a hearing at which
20 the decision was taken, and taken regretfully,
21 to adjourn the evidence of Mr Jenkins until
22 after the summer break. I explained the reasons
23 for postponing Mr Jenkins' evidence to the
24 public. I'm not going to repeat them now.

25 Later that day, last Thursday -- in fact, it

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1 issue is not fully known nor is the Post Office
2 able to provide a timescale for the completion
3 of all necessary remedial activity.

4 "As regards the witnesses scheduled for next
5 week, in our letter of 5 July we explained the
6 steps being taken to address documents that may
7 have been impacted by the de-duplication issues
8 and that are potentially relevant to POL's
9 prosecution and criminal investigation policies.
10 We can confirm that initial search terms that
11 have been run have returned hundreds of
12 thousands of documents.

13 "The Post Office is still not in a position
14 to confirm the number of documents that will
15 need to be prioritised for review, ie in
16 relation to Andrew Hayward, John Scott and Rob
17 Wilson. Although we anticipate the number of
18 documents that will ultimately need to be
19 produced to the Inquiry will be relatively low,
20 the number of documents that may need to be
21 reviewed could be very significant. This in
22 turn could impact on the lead time to producing
23 them to the Inquiry."

24 It's notable, sir, from this letter, that
25 the Post Office's initial search terms had

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1 was at 6.13 pm that night -- the Post Office
2 sent a letter to the Inquiry that contained
3 an update on its remediation plan. That letter,
4 the 6.13 pm Thursday letter, has been disclosed
5 to Core Participants. I'll read the relevant
6 parts of it now.

7 "This letter sets out the Post Office's
8 current understanding and position in relation
9 to the most significant disclosure issues that
10 could potentially impact on the evidence in this
11 phase. At the outset, the Post Office wishes to
12 apologise unreservedly that these issues have
13 already impacted the scheduled hearings
14 requiring the adjournment of Gareth Jenkins'
15 evidence today and tomorrow."

16 The letter continued by addressing the
17 remediation to the search terms issue. It then
18 addressed putting right the de-duplication
19 exercise and said:

20 "This issue only came to light on 16 June
21 2023 at which the scope of its impact was
22 unclear. Mr Foat indicated in his oral evidence
23 that he was not in a position to give
24 a timescale for this work. Regrettably, it
25 remains the position that the scale of this

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1 "returned hundreds of thousands of documents"
2 but that it was not in a position even to
3 confirm the number of documents which would need
4 to be prioritised for review for this week's
5 hearing.

6 In the light of this material, you decided,
7 as you said you would, to issue directions to
8 the Post Office. I'm not going to read all of
9 your directions and the preamble to them into
10 the record, not least because they're publicly
11 available on our website. The relevant part of
12 them was as follows:

13 "Any documents that relate to Phase 4
14 witnesses that are disclosed as a result of the
15 Post Office's remediation of search terms,
16 family documents or de-duplication issues, as
17 the case may be, must be provided to the Inquiry
18 as follows: (i) for all witnesses who are due to
19 give evidence to the Inquiry up to and including
20 28 July 2023, no later than two clear working
21 days before the date on which that witness is
22 due to give evidence; (ii) for future Phase 4
23 witnesses, no later than 14 August 2023. The
24 Inquiry will shortly publish an indicative
25 timetable.

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1 "For all documents provided as above the
2 Post Office must clearly identify the witness's
3 request and/or notices to which the documents
4 are said to relate.

5 "Any documents that are disclosed as
6 a result of the Post Office's remediation of
7 search terms, family documents or de-duplication
8 issues, as the case may be, and otherwise
9 respond to the Inquiry's requests issued under
10 Rule 9 of the Inquiry Rules, or Section 21 of
11 the Inquiries Act, as the case may be, and
12 relate to Phase 4, must be provided to the
13 Inquiry no later than 14 August 2023. This does
14 not affect any existing deadlines set by
15 specific Rule 9 requests or related
16 correspondence. The Post Office must identify
17 the request or notices to which the document is
18 said to be responsive.

19 "I make clear that the periods identified
20 above, in particular in respect of the first
21 direction, may in some cases only allow the
22 Inquiry's legal team an opportunity to consider
23 whether it remains possible to call the relevant
24 witness on the date that has been fixed. Where
25 the numbers of documents are small or of

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1 comply with the disclosure directions for the
2 witnesses being called this week. So, to be
3 clear, this was the Post Office saying that the
4 pool of documents that it needed to look at
5 would not itself be identified until at least
6 the close of business tomorrow in respect of
7 a witness due to be called today.

8 Further, that does not, of course, address
9 when the potentially relevant documents
10 themselves would be identified; when they would
11 be provided to the Inquiry; how long we would
12 have to process them and get them out to Core
13 Participants; how long they would have -- the
14 Core Participants, that is -- to look at them
15 and to formulate their questions; how long
16 witnesses would have to look at them; how long
17 we would have to analyse them and to formulate
18 our questions or, indeed, to pursue further
19 disclosure enquiries.

20 The Post Office added that it would not be
21 in a position to confirm whether it could comply
22 with the disclosure directions in relation to
23 the witnesses to be called next week, ie week 3,
24 until later.

25 Yesterday at 4.04 pm we received a further

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1 tangential evidence, it is more likely that the
2 hearing will be able to proceed. However, the
3 Post Office and any other document provider
4 should be in no doubt that I will take any
5 further delay caused by the late disclosure of
6 relevant documents or a failure to provide
7 disclosure of relevant documents extremely
8 seriously and I will not hesitate to continue to
9 call those responsible to give evidence to the
10 Inquiry to account for any failings."

11 The Inquiry received a further letter from
12 the Post Office at 2.11 pm on Friday last week,
13 7 July. This letter referred to your directions
14 and set out details of what was described as
15 a "new work flow" that was "under construction"
16 to isolate documents potentially impacted by the
17 de-duplication issue.

18 The Post Office stated that it will not be
19 able to even to identify, prior to at least
20 disclose of business tomorrow, even
21 a preliminary number of documents that it would
22 need to review prior to the witnesses due to
23 give evidence this week: today, tomorrow,
24 Thursday and Friday. As such, the Post Office
25 said, firstly, it would not be in a position to

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1 four-page letter from the Post Office. This
2 said, in summary, that the Post Office continued
3 to investigate the underlying cause of the
4 de-duplication issue with a view to providing
5 an explanation to the Inquiry and to ensure that
6 it does not reoccur.

7 The Post Office said that it had not yet
8 been possible to determine precisely when or why
9 the approach to de-duplication that had been
10 adopted had been adopted and whether it was
11 a standard approach or an *ad hoc* approach. The
12 Post Office said that, in respect of week 2
13 witnesses, ie this week, the position remained
14 as set out in previous correspondence, ie it
15 wouldn't be known until tomorrow at close of
16 business, even the size of the problem.

17 In respect of week 3 witnesses, the Post
18 Office said that it was prioritising work on
19 them by expanding the team working on these
20 witnesses but, at the time of writing -- that's
21 4.00 yesterday afternoon -- no preliminary
22 search results had been received and that it
23 anticipated it would only be able to set out
24 these preliminary search results on Friday of
25 this week. To quote the letter:

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1 "Accordingly, it will appear that it will be
2 very difficult for the Post Office to complete
3 a review of those documents identified in
4 sufficient time before the start of week 3."

5 In relation to week 4 witnesses, the letter
6 said:

7 "We acknowledge that in our 7 July letter we
8 did not specify any concerns in relation to POL
9 being able to comply with the July directions as
10 they relate to week 4 witnesses. This was not
11 intended to convey that the de-duplication issue
12 does not affect the week 4 witnesses and POL
13 regrets to say that they may also be affected by
14 the de-duplication issue. We apologise for any
15 confusion that has been caused by our omission
16 to address the week 4 witnesses until now, which
17 is due to the initial focus being on remediating
18 the de-duplication issue in respect of the
19 witnesses for weeks 2 and 3.

20 "As regards Alan Lusher, who is a former POL
21 employee, the steps being taken to remediate to
22 the de-duplication issue in respect of the
23 week 3 witnesses are also being undertaken in
24 respect of him. The remaining week 4
25 witnesses -- Jason Coyne, Susanne Helliwell,

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1 revealed that a number of documents were now to
2 be disclosed that are responsive to our Rule 9
3 Request and, if you look on the last page of the
4 letter, sir, page 4, there's a table and it sets
5 out the Rule 9 requests that the documents now
6 being disclosed were responsive to. The first
7 one was our Rule 9 request number 5, dated
8 26 November 2021; the second was our Rule 9
9 request 10, which was the 16 February 2022; the
10 third was our Rule 9 request number 12, which
11 was 31 May 2022; the fourth was our Rule 9
12 request 14 of 14 June 2002; and the last was our
13 Rule 9 request number 3, dated 20 January 2023.

14 So this reveals number of documents are now
15 to be disclosed that are responsive to Rule 9
16 requests, the first of which was dated
17 26 November 2021 and so this material ought to
18 have been produced to this Inquiry pursuant to
19 that request some 18 months ago now.

20 The letter concludes, under the heading
21 "Course of action to be adopted by the Inquiry":

22 "POL does not seek to make any submissions
23 as to the course of action to be adopted by the
24 Inquiry in response to the Inquiry's invitation
25 of the 7 July 2023. It fully recognises the

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1 Colin Lenton-Smith and Jan Holmes -- are not
2 current or former POL employees however, as with
3 Mr Jenkins, steps will nevertheless need to be
4 taken in order to identify and review any
5 documents potentially impacted by the
6 de-duplication issue in respect of these
7 individuals.

8 "POL will write to the Inquiry confirming
9 whether any potential impact has been identified
10 and outlining the proposed approach in respect
11 of these individuals as soon as possible and by
12 no later than this Wednesday, 12 July.

13 "POL currently anticipates that the work
14 flow to address the de-duplication issue should
15 be fully operational well in advance of 24 July
16 2023, and POL currently anticipates being able
17 to comply with the July directions in relation
18 to the week 4 witnesses. Should this position
19 change for any reason, eg the number of impacted
20 documents that require review is very large,
21 even after search parameters have been refined,
22 POL will update the Inquiry immediately."

23 The letter then addressed what had been
24 uncovered in relation to the Gareth Jenkins
25 de-duplication exercise. In summary, it

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1 difficulties that the current issues with
2 disclosure have created and the tension between
3 the two options outlined by the Inquiry, and
4 reiterates its profound apologies for having put
5 the Inquiry and other Core Participants in this
6 invidious position."

7 You may consider it insincere of the Post
8 Office repeatedly to send to the Inquiry letters
9 about how they have failed to meet the deadlines
10 for the provision to the Inquiry of potentially
11 relevant documents, ie breach your directions,
12 and at the same time say that they will not take
13 a position on whether there should be
14 an adjournment of relevant witnesses or not.
15 This simultaneous provision of information by
16 the Post Office, which points clearly in one
17 direction but silence on the consequences of its
18 own actions, is something that you may wish to
19 explore, in particular whether this is because
20 the Post Office will not say out loud the truth
21 that dare not be spoken -- ie there must be
22 an adjournment -- or whether the Post Office
23 simply refuses to face up to the aftermath of
24 the revelation of its own conduct.

25 Sir, save for a small number of matters,

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1 I do not propose at the moment to say anything
2 about the maddening state of affairs that we are
3 faced with. Instead, I will listen and may
4 respond at the end of Core Participants's
5 submissions.

6 The small number of points that I'll make
7 now, however, are as follows: firstly, you will
8 be aware that powers under Section 21 of the
9 Inquiries Act 2005 give to you to require any
10 person to produce any documents in their custody
11 or under their control that relate to a matter
12 in question at the Inquiry and that, if a person
13 fails without reasonable excuse to comply with
14 such a notice, that person commits a criminal
15 offence.

16 The natural reaction in a situation like the
17 present is to say that the Inquiry should not
18 hesitate to use these powers against the Post
19 Office. However, as you also know,
20 section 21(4) of the 2005 Act permits a person
21 served with such a notice to apply to you to
22 determine a claim that he is unable to comply
23 with the notice or that it's not reasonable in
24 the circumstances to require him to comply with
25 such a notice.

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1 a ruling to that effect by Sir Brian Leveson in
2 the eponymously named Inquiry that he conducted
3 but, more than that, the schedule to the
4 Interpretation Act 1978, contains a provision
5 which sets out that in other instruments and
6 enactments -- and I'm summarising here --
7 a person must be taken, unless the context
8 otherwise requires, to mean a legal and
9 a natural person. So the short answer is it
10 could apply to the Post Office as a corporation.

11 **SIR WYN WILLIAMS:** Yes, but the, what I'll call
12 loosely, statutory defence to the criminal
13 allegation would be available to both the
14 natural and the unnatural legal person, if I can
15 put it in that way.

16 **MR BEER:** Yes, it would. Before one got to the
17 issue of a criminal offence, the process is we
18 serve a notice saying "Please produce" -- and
19 I'm drafting on my feet here -- "all documents
20 relevant to Andrew Hayward by 4.00 last
21 Thursday", the answer to that would probably be
22 an application under section 21(4), "It's not
23 reasonable for us to comply with the notice
24 because", and then essentially what is sent out
25 in the letters would appear and you would have

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1 Whilst it's tempting to look at the sorry
2 history of disclosure by the Post Office and
3 reach the conclusion that that sorry history
4 should be visited by the service of a section 21
5 of the Post Office to require production of
6 documents relevant to our upcoming witnesses,
7 we, as your team, are clear that, in the
8 situation that we now find ourselves, that would
9 be met with a section 21(4) application relying
10 on precisely the same facts and matters as are
11 set out in the letters which I have read to you.

12 **SIR WYN WILLIAMS:** Mr Beer, can I ask you, in
13 respect of section 21, is the word "person" to
14 be interpreted, as is sometimes the case, as
15 a legal person, which might include
16 a corporation, or is it to be interpreted as the
17 human person to whom the notice is sent?

18 **MR BEER:** I think the law is clear on this.

19 **SIR WYN WILLIAMS:** Yes.

20 **MR BEER:** A person in the context of the Inquiry
21 Rules, and it appears in a number of places,
22 should be read as referring to both a legal and
23 a natural person. That has been the consistent
24 approach taken by inquiries held under the 2005
25 Act to which the 2006 rules apply, stemming from

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1 to determine that claim.

2 If you determined that claim against the
3 Post Office and there was still non-compliance,
4 then there could be criminal proceedings and, in
5 the criminal proceedings, there's a reasonable
6 excuse defence too.

7 **SIR WYN WILLIAMS:** Yes.

8 **MR BEER:** So there's two stages at which the
9 reasonableness of compliance is addressed in the
10 process. The point I'm simply making, sir, is
11 although it is very easy, and it is my initial
12 reaction to a non-disclosure issue, to rely on
13 the statutory machinery backed by criminal
14 sanctions, this isn't a situation where we're in
15 a position to undermine anything that we're
16 currently being -- is being said to us. It's
17 not about what has happened in the past,
18 particularly right now, it is the situation that
19 has now been revealed and whether it would be
20 reasonable to say "Turn over all of this
21 material in the next 24 hours", and whether that
22 would be ever capable of being done.

23 **SIR WYN WILLIAMS:** Yes. In terms of sanctions more
24 generally, if I can put it in that rather loose
25 way, there is no such thing. There is

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1 a statutory framework and I'm bound by the
2 statutory framework, yes?

3 **MR BEER:** Yes. In the ordinary event that this was
4 a proceeding in a court or, indeed, some forms
5 of tribunal, what has happened here would
6 doubtless be visited by an adverse order for
7 costs against the Post Office to pay for the
8 consequences of their misconduct. That's not
9 a sanction that's available to you under the
10 2005 Act or the 2006 Rules.

11 **SIR WYN WILLIAMS:** No. Thank you.

12 **MR BEER:** The second matter that I would invite you
13 to consider, sir, is what evidence there is that
14 this remediation exercise is likely to turn over
15 evidence that is relevant to the witnesses who
16 are to give evidence, ie what's the likelihood
17 that this remediation exercise will yield fruit?
18 I'm not inviting you to speculate there but,
19 instead, perhaps just to look a little while
20 backwards at what has happened so far.

21 The first point I'd make is, in contrast to
22 some previous instances, I'm talking about
23 months ago now, of late disclosure by the Post
24 Office, where in correspondence it's said that
25 the documents it has located appear not to be

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1 a different view -- but it may have been
2 appropriate for me to take something of a chance
3 in respect of late disclosure.

4 We're now at a stage where we are reaching
5 a crucial part of the investigation, are we not,
6 in terms of personal accountability, where the
7 scope for taking a risk or a chance with
8 disclosure is vanishingly small in comparison.

9 **MR BEER:** Sir, I would respectfully agree and you'll
10 recall that when I was making submissions last
11 Thursday about Mr Jenkins' position, I noted
12 that one of the documents that had been obtained
13 as a result of this disclosure exercise was
14 indeed highly relevant to the evidence that he
15 would give.

16 The third point under this subheading is
17 that I should point out that the Inquiry has
18 recently received from the Post Office a series
19 of documents relating to Alison Bolsover's
20 evidence. Prompt analysis by the Inquiry Team
21 that sits behind me suggests that these
22 documents include documents which are highly
23 relevant to the evidence which she is to give.

24 The third point that I would draw
25 respectfully to your attention, sir, is to

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1 important or significant to the upcoming
2 witnesses, on this occasion, in the clip of four
3 letters that I have taken you through, nowhere
4 has that been said. The Post Office has not
5 said, "This material may be insignificant".

6 The second thing. I read to you the section
7 of the letter of yesterday of 4.04 pm, at the
8 end concerning Gareth Jenkins, and you will see
9 that a number of documents that have been turned
10 up that are relevant in the Post Office's
11 assessment to the evidence of Gareth Jenkins.
12 It's fair to say that's a much smaller number
13 than the initial estimate of 4,767 that was
14 given. There's only 35 in the list.

15 **SIR WYN WILLIAMS:** Yes. In the past, Mr Beer, we
16 have -- I say "we", but ultimately I -- have
17 adopted a somewhat pragmatic approach and
18 perhaps an approach based more upon hope than
19 anything else, that documents which turn up late
20 will not turn out to be particularly
21 significant, and I've been conscious that I've
22 been doing that, for example, in respect of the
23 very early development of Horizon and such
24 matters, where it may have been appropriate --
25 I stress "may" because others me take

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1 recall Tony Marsh's evidence of last week, and
2 I'm not going to invite you to make findings now
3 on the veracity or reliability of everything
4 that he said but one of the things that he did
5 say was that, having read carefully Mr Duncan
6 Atkinson KC's report, it appeared that the
7 policies and procedures that the Inquiry had
8 been given by the Post Office was not a complete
9 set that reflected his memory of the policies
10 and procedures that were in place.

11 **SIR WYN WILLIAMS:** The impression I gained, Mr Beer,
12 was that he was at pains to press that upon me.

13 **MR BEER:** He was and, whilst, of course, there's
14 an obvious reason to say it might be right that
15 the policies you've got are, if Mr Atkinson KC
16 is right, defective, there's this whole bunch of
17 other policies that you haven't seen, and they
18 were much better. Of course, there may be
19 a motive for saying that. That is evidence that
20 you should take into account in the present
21 situation, that you have received evidence under
22 affirmation that there has been non-disclosure
23 of policy documents to this Inquiry from
24 somebody as Head of Security for seven or so
25 years who would be expected to know.

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1 The fourth point that I would make before
2 sitting down, sir, is to remind you that at
3 least two of the witnesses who we are planning
4 to hear from over the coming week -- I shall not
5 name them now -- were witnesses who, because of
6 the evidence that they have given and because of
7 documents already in the possession of the
8 Inquiry, were witnesses who I would invite you
9 to give the warning against self-incrimination
10 to.

11 **SIR WYN WILLIAMS:** Right.

12 **MR BEER:** Sir, we asked all Core Participants to
13 identify whether they wish to make submissions
14 this morning and I should just record the
15 negative returns.

16 UKGI said that they had no submissions to
17 make, Paula Vennells said that she had no
18 submissions to make and Fujitsu have informed us
19 that they have no submissions to make.

20 In terms of the order this morning, sir,
21 it's entirely a matter for you, but you may
22 wish, if you consider it appropriate, to hear
23 anything that the Post Office wishes to say
24 first, and then give the subpostmaster Core
25 Participants the floor in the order in which

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1 sir, of which of the two alternatives that you
2 identified should be adopted.

3 In our view, it is not right for Post
4 Office, as the organisation at the heart of this
5 Inquiry and facing potentially very serious
6 criticism indeed, to advocate one way or the
7 other. Rather, it is the Core Participants,
8 particularly the postmasters, whose voices
9 should be heard on this occasion.

10 Sir, the very fact that you identified those
11 two alternatives indicates that there is not one
12 ineluctable view that may be taken by others
13 involved in this Inquiry and it is, with
14 respect, those voices who we suggest, sir, you
15 hear before making any decision. But
16 I emphasise again the deepest of apologies on
17 behalf of the Post Office for the position, sir,
18 that we have put you and all those involved in
19 the Inquiry in, but emphasise we will continue
20 to do everything that we possibly can to
21 remediate and resolved the position.

22 Thank you.

23 **SIR WYN WILLIAMS:** Ms Gallafent, I put forwarding
24 two alternatives because it seemed to me at the
25 time I wrote them, or that they were written,

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1 they wish to speak.

2 **SIR WYN WILLIAMS:** I agree. So let Ms Gallafent say
3 what she wishes to say.

4 **Submissions by MS GALLAFENT**

5 **MS GALLAFENT:** Sir, good morning.

6 Can I start by repeating the unambiguous
7 apology for the position that the Inquiry and,
8 in particular, the Core Participants find
9 themselves in, as a result of the failures of
10 Post Office's disclosure. We had set out in our
11 letter sent yesterday, sir, our position that we
12 did not seek to make submissions on the two
13 alternatives that you had identified when
14 directing this morning's hearing. That is not,
15 as counsel for the Inquiry suggested, in our
16 respectful view, because Post Office simply
17 refuses to face up to the aftermath of the
18 revelation of its own conduct.

19 Post Office is emphatically engaging with
20 the aftermath of discovering the issues, sir,
21 that we have written about on a number of
22 occasions and those letters reflect the efforts
23 that we have been going to, to remediate and
24 resolve those matters. But it is not right, in
25 our submission, for us to seek to persuade you,

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1 that they were the only runners, so to speak.
2 Am I right about that? Is there a third
3 alternative that you have thought about,
4 considered, and wondered why I'm not
5 considering?

6 **MS GALLAFENT:** No, sir. I note, of course, in your
7 directions you'd indicated it was open to anyone
8 to advance a third route. We haven't identified
9 a third route, sir. We'd accept that those are,
10 in our submission, the binary alternatives. Let
11 me make it clear that we are not in any way
12 seeking to anticipate other person's suggestions
13 that there might be perceived to be a third
14 route through.

15 **SIR WYN WILLIAMS:** All right. Is there anything
16 that you wish to say to update the latest
17 letter, so to speak? I'm not thinking you
18 should but I'm just giving you the opportunity.
19 That's all.

20 **MS GALLAFENT:** No. I'm very grateful and, sir,
21 you'll appreciate that matters are rapidly
22 moving. We will be updating you, sir, in
23 correspondence but that won't be until later
24 today. But we are conscious of the efforts that
25 are going on behind the scenes and we will

28

1 provide you with updates as soon as we can in
2 that respect. But I don't have anything further
3 at this point in time today to update you on,
4 sir.

5 **SIR WYN WILLIAMS:** One of the things I'm thinking
6 about which would impact upon you -- when I say
7 "you", I mean you and your team -- and therefore
8 you need to consider it, is that I should be now
9 much more proactive in the sense of not waiting
10 for letters from you to update me but adopting
11 a much more -- a practice much more akin to that
12 which I have done in relation to compensation
13 and literally scheduling hearings frequently,
14 certainly frequently over the next few months,
15 notwithstanding the advent of the holiday
16 period, so that people's minds are crystallising
17 by the prospect of having to state publicly what
18 the position is. Do you have any observations
19 about that?

20 **MS GALLAFENT:** Sir, I can assure you that people's
21 minds are already firmly crystallising and
22 crystallised on the importance of that matter.
23 You should be in no doubt, sir, with respect,
24 about that.

25 I don't seek to persuade you from holding
29

1 I anticipated, the principal legal
2 representatives for the subpostmasters will now
3 no doubt wish to address me. So in whatever
4 order you have agreed, if you have, I am happy
5 to hear you.

6 **MR STEIN:** Sir, I believe that, with the agreement
7 of my learned friends, that I am able to go
8 first.

9 Submissions by MR STEIN

10 **SIR WYN WILLIAMS:** Right.

11 **MR STEIN:** Sir, it doesn't matter whether the Post
12 Office is dodgy or incompetent, or more likely
13 that the Post Office is staffed by dodgy
14 incompetence. The way that our clients are
15 being treated is an outrage, the way that this
16 Inquiry is being treated is an outrage.

17 These disclosure issues follow a month
18 whereby, sir, you were unable to continue with
19 these proceedings within this Inquiry due to ill
20 health. They arise at a time when we start to
21 deal with, and have had one of, the Heads of
22 Security, which we have seen through the course
23 of this evidence in this Inquiry to be a focal
24 point of many of the issues with which we are
25 about.

31

1 a hearing, were that would be considered
2 appropriate, on the subject of closure but just
3 to emphasise, sir, at the moment we are focusing
4 our energies and efforts on trying to resolve
5 the issue rather than -- which we recognise is
6 an equally important question -- to identify
7 exactly how the issue arose and how to prevent
8 it arising again. So we are throwing everything
9 at it at the moment to try to get the documents
10 reviewed and to the Inquiry.

11 I don't say that by way of putting off
12 an evil day; I say that simply because if, sir,
13 you were to suggest holding a separate hearing
14 on the question of disclosure, that would
15 inevitably, at this point in time, take some of
16 the resources away from the remediation efforts
17 that are already under way. But, sir,
18 I recognise fully that's entirely a matter for
19 you, sir.

20 **SIR WYN WILLIAMS:** All right. I'll think about
21 that, as I hear other people develop whatever it
22 is they wish to say. Is that it, Ms Gallafent?

23 **MS GALLAFENT:** It is. Thank you, sir.

24 **SIR WYN WILLIAMS:** Thank you. Right.

25 Well, as Mr Beer indicated, and as
30

1 Our clients don't believe in coincidence.
2 They don't believe that what is happening here
3 is some difficulty that the Post Office is
4 having at this particular time. This seems to
5 them, from their experience, to be deliberate.

6 Before I develop our overall response to the
7 two options, I make no apology and I will be
8 quoting a number of our clients and their
9 reactions to what has happened. Sir, as you
10 know, we represent 157 former subpostmasters and
11 mistresses. A great many of our clients have
12 developed mental health conditions due to the
13 Post Office's original actions against them. It
14 needs to be understood they are now reliving the
15 same nightmares, being retraumatised by the Post
16 Office's conduct.

17 One of my clients says:

18 "My anxiety is at an all-time high. My
19 mental health is taking its toll. I can't see
20 any light at the end of the tunnel. Post Office
21 always throws a spanner in the works. It's the
22 same tactics every time. They're just can
23 kicking, taking the mickey out of the Chair,
24 you, the lawyers and us. They have total
25 disregard for any of us. They're making fools

32

1 of everyone with no consequence, same as always.
 2 They think they're untouchable and unless
 3 anything is done, they'll keep believing and
 4 acting of the same."

5 The same client asks this:
 6 "Why is no one getting aggressive with them?
 7 Stop pandering to them. Talk is cheap, actions
 8 speak louder than words. Hit them where it
 9 hurts: in the pocket. They'll soon take notice
 10 then.

11 "Having to relive these tactics of the Post
 12 Office again brings back memories of how they
 13 treated us when we were suspended: the not
 14 knowing what they're playing at. I can't handle
 15 this much more. They're grinding us down, as
 16 always. They know what they're doing, they're
 17 causing people to lose their minds and this is
 18 on par with how they've always treated us.
 19 I can't sleep, concentrate and I'm getting
 20 snappy with my family because it's in the
 21 unknown."

22 Further comments:
 23 "I know this Inquiry is separate to
 24 compensation but to us claimants the
 25 compensation will always remain the forefront of

1 last hope for any just recompense and it is now
 2 lost."

3 "The whole situation with the Post Office is
 4 so frightening", another writes, "frustrating
 5 and is affecting my mental health badly at the
 6 moment. I have lived the last 16 years
 7 suffering from mental health and on medication
 8 due to their actions. A lot of anger and
 9 frustration was shown at the meeting today."

10 That refers a meeting we had with our client
 11 group:

12 "... and those of us who were part of the
 13 555 Litigation can see the way they treated us
 14 then repeating itself again, and they will get
 15 away with it, as they always have."

16 Another client:
 17 "At the outset of this Inquiry, I found it
 18 of great help to me and my mental health.
 19 However, every time there is a delay caused by
 20 the Post Office procrastination and deliberate
 21 obstruction, it has detrimental effect on me.
 22 Therefore, I'd prefer that we continue, as
 23 I have no faith that the Post Office will not
 24 continue making late disclosures again and again
 25 at key points in proceedings causing recurring

1 our minds. Everyone is being paid, it seems,
 2 except those most affected: the claimants. The
 3 two go hand in hand. No matter how many times
 4 you say this is separate, to the claimants the
 5 compensation is more important than the Inquiry.
 6 We can't live on fresh air.

7 "They will have more blood on their hands
 8 should things not improve, because I feel people
 9 are on the very cusp of giving up. Post Office
 10 don't care. Another claimant who takes their
 11 life is one less to pay.

12 "Leading on from that, the way the Post
 13 Office are acting fills me with zero confidence
 14 that, come the time the claims to be settled,
 15 these will not be completed by August 2024.
 16 There is no way on God's Earth they will settle
 17 all claims in time. They can't produce a piece
 18 of paper on time. What makes you think they
 19 will settle claims? None."

20 Another client:
 21 "Every day my body and mind sink further.
 22 There is no happy retirement for me. I can't
 23 get closer to my family. I so understand why so
 24 many leave us by their own hand. POL is
 25 a machine. It doesn't care. Sir Wyn was the

1 delays, which would have a continuing
 2 detrimental effect upon me."

3 Another client:
 4 "I would urge the Chair to take the
 5 strongest measures possible in his power to
 6 force the Post Office into disclosing all
 7 relevant documentation, even if that means going
 8 to the High Court. The Post Office has
 9 consistently failed to disclose information
 10 throughout the whole process and I go back
 11 14 years of fighting them.

12 "The Post Office cannot be trusted to tell
 13 the truth and have shown complete disregard for
 14 the law of our land. Their officials have been
 15 shown to tell untruths in court and in evidence
 16 documents over many years. They are making
 17 a mockery of this Inquiry and have scant regard
 18 to the people whose lives and health they have
 19 ruined."

20 Sir, you can see that the Post Office's
 21 conduct has serious, direct, human consequences.
 22 Many of our clients are despairingly driven to
 23 the conclusion that these recent developments
 24 are nothing other than a deliberate attempt by
 25 the Post Office to interfere with, frustrate and

1 undermine the Inquiry process.
 2 This Inquiry is built upon the judgments of
 3 Mr Justice Fraser in the High Court and, sir,
 4 you will recall that Mr Justice Fraser made
 5 a number of comments about the cavalier approach
 6 that the Post Office applied to disclosure in
 7 the Group Litigation. I remind you of one part.
 8 Judgment number 6, Horizon Issues, dated
 9 16 December 2019. Paragraph 575 of the
 10 judgment. I quote Mr Justice Fraser:
 11 "In the letter of claim from the claimants
 12 dated 28 April 2016, the Known Error Log was
 13 sought from the Post Office, that letter stating
 14 'We understand that Fujitsu maintained a Known
 15 Error Log for Horizon and that such reports will
 16 have been provided to Post Office. Please see
 17 the list of the categories of documents relating
 18 to Fujitsu referred to below that we request
 19 disclosure of.'
 20 "Item 22 in the list of documents sought was
 21 the Known Error Log kept by Fujitsu and provided
 22 to Post Office Fujitsu, as referred to above,
 23 and all correspondence relating to the same."
 24 Paragraph 576:
 25 "The answer in a letter from the Post
 37

1 of Mr Wallis's book *The Great Post Office*
 2 *Scandal* where one of the barristers, now King's
 3 Counsel, Kathleen Donnelly, who represented
 4 subpostmasters before Mr Justice Fraser, said
 5 the following:
 6 "It is obvious that the Post Office had
 7 a strategy to withhold material until they were
 8 forced to produce it. This caused delay,
 9 disruption and ran up costs. We only received
 10 significant documents after a battle and were
 11 left with little time to review them, sometimes
 12 just days before a witness was cross-examined.
 13 It was exasperating."
 14 Those words are just as applicable today as
 15 it was during the High Court action.
 16 Sir, you're aware that my instructing
 17 solicitors, Howe+Co, have made repeated
 18 submissions to the Inquiry in relation to
 19 disclosure issues. I repeat a section of the
 20 letter dated 2 February 2023. Howe+Co stated
 21 this:
 22 "Post Office's habitual delay in complying
 23 with the disclosure process is hampering full
 24 and thorough preparation by us and no doubt
 25 other representatives of complainant Core
 39

1 Office's solicitors against the specific item 22
 2 was:
 3 "In circumstances where you have not
 4 particularised any factual basis on which
 5 Horizon is defective, disclosure of these
 6 documents (if they exist) is not relevant,
 7 reasonable or proportionate'.
 8 Mr Justice Fraser concluded this particular
 9 section at paragraph 577:
 10 "The suggestion in that letter that the
 11 Known Error Log was not relevant is simply wrong
 12 and, in my judgment, entirely without any
 13 rational basis. The further suggestion viewed
 14 with the hindsight now available, that the Known
 15 Error Log may not exist, is disturbing. The
 16 claimants' request use the precise title, "Known
 17 Error Log", and this clearly did exist. To
 18 suggest in an answer 'if they exist' is somewhat
 19 misleading."
 20 In other words, the Post Office has form for
 21 that this type of behaviour and, we suggest, the
 22 Post Office has form which demonstrates itself
 23 in the disturbing way it treats its disclosure
 24 obligations.
 25 There is a very telling passage at page 319
 38

1 Participants, as well as the work of the Chair
 2 and the Inquiry Team."
 3 We suggest, sir, that the behaviour that has
 4 been set out in detail by my learned friend
 5 Mr Beer should be viewed in the clear light of
 6 all of the serious failings of the Post Office
 7 on the central issue of disclosure, that has run
 8 through the core of the Inquiry and, indeed,
 9 through the Post Office's conduct of all
 10 proceedings.
 11 We hope, sir, that it is understood that the
 12 very many clients we represent have no belief
 13 whatsoever in the good faith of the Post Office.
 14 Mrs Holmes, who, sir, you will remember lost
 15 her husband before he was cleared at the Court
 16 of Appeal, she asks why those:
 17 "... who are so obviously shambolic are
 18 claiming such high salaries or, if they are
 19 dishonest, why are they being allowed to run the
 20 Post Office?"
 21 Sir, we have been asked to give our view on
 22 the two proposed courses of action, in response
 23 to the latest disclosure scandal. In
 24 considering these options, we've also turned to
 25 the Inquiry's terms of reference, which state:
 40

1 "The Inquiry shall [at (b)] build upon the
 2 findings of Mr Justice Fraser and the judgments
 3 of the criminal courts specified above in the
 4 terms of reference by obtaining all available
 5 relevant evidence from Post Office, Fujitsu,
 6 BEIS, UKGI, to establish a clear account of (i)
 7 the implementation and failings of Horizon over
 8 its life-cycle; and (ii) Post Office's limited
 9 use of information from Horizon when taking
 10 actions against persons alleged to be
 11 responsible for shortfalls."

12 It is a core part, therefore, of the terms
 13 of reference that this Inquiry must pursue and
 14 continue to pursue the Post Office in relation
 15 to its disclosure obligations.

16 The first course suggested by the Inquiry is
 17 that the Inquiry proceeds to hear oral evidence
 18 from the seven POL witnesses, over the next
 19 couple of weeks, and Mr Atkinson, and the
 20 Inquiry states that it will not hesitate to
 21 recall any of these witnesses in due course if
 22 new, relevant documentation was provided that
 23 ought to be put to them.

24 The second option is that the hearing of
 25 those witnesses is adjourned and then re-listed

1 experiences fall away as a result.

2 Furthermore, there is the point that giving
 3 Post Office witnesses two separate occasions on
 4 which to give their evidence, assuming the
 5 recall, may give them an advantage of having had
 6 a dress rehearsal for what is to come.

7 So we make, on balance, the submission in
 8 support of the second option but with two
 9 important caveats. Firstly, we suggest that
 10 Mr Atkinson should give evidence as per the
 11 current timetable. That is because Mr Atkinson
 12 King's Counsel gives evidence as an Inquiry
 13 expert and, like Mr Cipione in Phase 2, is
 14 likely to be recalled in any event and can also
 15 therefore deal with further evidence as it
 16 emerges.

17 Secondly, we ask that the Inquiry uses some
 18 of the time that will be lost in these weeks to
 19 recall Mr Foat, to provide a fuller explanation
 20 on oath in relation to the Post Office's failure
 21 to comply with their disclosure directions.
 22 Further, we ask that the Inquiry requires the
 23 CEO of the Post Office, Mr Nick Read, and
 24 a relevant partner of Herbert Smith Freehills to
 25 attend to provide an explanation about the

1 after the summer break with the exception of
 2 witnesses concerning the Cleveleys Post Office.

3 We have taken instructions from our client
 4 group. There is a two-thirds majority that
 5 suggests that the right course of action is to
 6 adjourn to ensure that all relevant disclosure
 7 is made. May I say there is a strong third who
 8 say that this Inquiry is being dangled like
 9 a puppet by the Post Office and that the Post
 10 Office should not be allowed to call the tune.

11 Sir, our clients have every faith in you
 12 having no hesitation in re-calling witnesses,
 13 but recognise the fact that witnesses who have
 14 already given evidence may come under the
 15 question of "Is the new document
 16 significant/substantial? Will it make
 17 a difference to the evidence? Could it be dealt
 18 with another way?"

19 There is always a danger that the Inquiry
 20 may be put in a situation whereby witnesses that
 21 are being called, that we are suggesting should
 22 be recalled, the Inquiry may make a different
 23 decision to that to which we put forward and
 24 that could leave individual subpostmasters very
 25 frustrated, if questions relevant to their own

1 involvement of the Post Office's legal team in
 2 the disclosure process, so that they can answer
 3 questions on the wider issues concerned with
 4 what appears to be the Post Office's
 5 interference with this process.

6 In particular, we suggest that we need to
 7 know, and this Inquiry needs to be satisfied,
 8 that disclosure has been properly, honestly and
 9 competently dealt with in the modules we've had
 10 so far. There is nothing, absolutely nothing,
 11 in this recent disclosure mini-scandal, within
 12 the many of the disclosure scandals, that gives
 13 a single one of our clients any certainty that
 14 the Post Office's disclosure obligations have at
 15 any time been fulfilled at any point within this
 16 Inquiry.

17 So we ask that Mr Foat, Mr Read and the
 18 relevant Herbert Smith Freehills partner be
 19 called to attempt to assure us that these
 20 disclosure issues don't have relevance to the
 21 witnesses and modules we've already dealt with.

22 Therefore, sir, subject to the exception of
 23 Mr Atkinson King's Counsel and what we say about
 24 recalling Mr Foat, calling Mr Read and a partner
 25 from Herbert Smith Freehills, we submit, on

1 balance, that the second of the proposed
2 options, although regrettable, would represent
3 the fairest option for the Inquiry, its best
4 chance of fulfilling its terms of reference and
5 also fulfilling its duty to our clients and the
6 witnesses themselves.

7 It is important that we address the
8 possibility of the Inquiry taking sanctions
9 against the Post Office. It is quite apparent
10 to us, on behalf of our clients, that the
11 disclosure issues presented by the Post Office's
12 actions and omissions are capable of preventing
13 the Inquiry's fulfilment of at least part of the
14 terms of reference.

15 We submit that the response of the Inquiry
16 should be proportionate to the seriousness of
17 the disruption which has been caused by the Post
18 Office's conduct.

19 We ask you, sir, to consider the remedy or
20 the remedies open to the Inquiry and, in
21 particular, in relation to Section 36.
22 Section 36 of the Inquiries Act 2005 enables
23 a chair of an Inquiry to certify to the High
24 Court the failure of a person to comply with
25 a Section 21 notice or an order made by the

45

1 properly with a Section 21 notice which had been
2 served, and the court ordered the respondents to
3 do so.

4 It is relevant to note, sir, that Section 36
5 refers to orders made by an Inquiry as well as
6 statutory notices.

7 We submit that an application to the High
8 Court in relation to the Post Office's failures,
9 in relation to the disclosure directions given
10 on 7 July of this year, would provide the
11 Inquiry with an appropriate remedy in this case
12 and work well in tandem with the proposal that
13 you have made. Importantly, the procedure under
14 Section 36 will expose the Post Office, as
15 a company, and potentially its directors, to
16 committal for contempt of court should the Post
17 Office fail to comply with any Section 21 notice
18 or order from the Inquiry to produce the
19 evidence which the Inquiry has requested.

20 The High Court would not approach this in
21 an unthinking way. It would approach this in
22 a way that would actually understand the current
23 position and the difficulties with the
24 disclosure process.

25 Sir, in conclusion, we ask that the Inquiry

47

1 Inquiry. The court, the High Court, would then
2 be able to make an order, by way of enforcement
3 or otherwise, to compel a party to comply.

4 Sir, you may feel that that would work well
5 with the suggestion that you have made and
6 considered with Ms Gallafent King's Counsel,
7 that the Inquiry works in a similar way to the
8 compensation hearings that we have, to drill
9 down into the detail of what is happening with
10 the disclosure.

11 We invite, sir, you to consider the
12 possibility that that approach would work well
13 in tandem with the strength of the powers of the
14 High Court backing it. The courts have accepted
15 that Section 36 may be appropriate in cases of
16 this kind. In Paisley 2008, Queen's Bench
17 Division in Northern Ireland held that the focus
18 of Section 36 was on obtaining information and
19 the provision was successfully used by the
20 Chair, Sir Martin Moore-Bick in the *Grenfell*
21 *Tower Inquiry* in *Moore-Bick v Mills [2020] EWHC*
22 *618 (Admin)*. In that case, Mr Justice Mostyn
23 accepted that the respondent had not treated
24 a public inquiry with the seriousness that it
25 deserved and had failed to respond fully or

46

1 takes the second of the two options, subject to
2 what we have said about Mr Atkinson King's
3 Counsel and requiring the attendance of Mr Foat,
4 Mr Read and a partner from Herbert Smith
5 Freehills. The Inquiries Act does provide
6 a procedure backed up by sanctions to enable you
7 to put a stop to the Post Office's continual
8 interference with the progress of this Inquiry
9 and we ask you, sir, to give serious
10 consideration to deploying that process.

11 Sir, we cannot emphasise enough that the
12 conduct of the Post Office is having hugely
13 detrimental effects on the mental health of some
14 of our clients. It is retraumatising them, it
15 is putting them through it, it is reminding them
16 of exactly the way that the Post Office has
17 approached the litigation at the High Court.

18 Our clients are adamant that the Post Office
19 must not be permitted to control or interfere
20 with this Public Inquiry.

21 I think I've finished my submissions but
22 I see a note from my instructing solicitor.

23 Just one second.

24 **SIR WYN WILLIAMS:** Of course.

25 **MR STEIN:** Sir, yes. I'm very grateful. It relates

48

1 to the question of the hearings in relation to
2 disclosure.
3 This would provide useful support for the
4 process and, of course, could be scheduled to
5 take place alongside the compensation hearings
6 that you already have.

7 Sir, those are our submissions overall. Can
8 I assist any further?

9 **SIR WYN WILLIAMS:** No, thank you very much.

10 Right. By my computer clock, it's 11.06.

11 Who is next to speak?

12 **MR MOLONEY:** Sir, that would be me and I'll just be
13 a very few minutes. So it maybe --

14 **SIR WYN WILLIAMS:** Well, then we'll hear you,
15 Mr Moloney, and then have a break, if that's the
16 case.

17 **Submissions by MR MOLONEY**

18 **MR MOLONEY:** Thank you, sir.

19 Sir, we echo much of that which has been
20 said by Mr Stein but won't repeat it. It is
21 an awful position that the postmaster Core
22 Participants find themselves in again, not least
23 with their having to listen to the apparent
24 apologies of Post Office again, and the more
25 those apologies are made, the more hollow they

49

1 take the view that the Inquiry should not
2 continue with the witnesses scheduled for this
3 week or next.

4 **SIR WYN WILLIAMS:** Does that include Mr Atkinson in
5 your case?

6 **MR MOLONEY:** Sir, it does, in our view. Mr Atkinson
7 is an expert witness and he has to provide his
8 opinion after reviewing all relevant evidence.
9 If there are concerns as to whether he has been
10 provided with all relevant evidence, he
11 shouldn't give evidence until those concerns are
12 dealt with.

13 **SIR WYN WILLIAMS:** All right. Is that it,

14 Mr Moloney?

15 **MR MOLONEY:** That's it, sir.

16 **SIR WYN WILLIAMS:** I said we'd take a break.

17 Mr Henry, do you want a break?

18 **MR HENRY:** I would like a little break, sir, if you

19 don't mind.

20 **SIR WYN WILLIAMS:** That's fine.

21 **MR HENRY:** Thank you very much, sir.

22 **SIR WYN WILLIAMS:** We'll start again at 11.25.

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

24 (11.08 am)

(A short break)

51

1 sound. But having consulted our Core
2 Participants, we would also prefer the option of
3 not hearing the evidence of the witnesses
4 scheduled for this week and next until
5 disclosure has been completed.

6 Core Participants should be able to
7 formulate their Rule 10 requests with the
8 benefit of the fullest practicable disclosure
9 and we have highlighted, in a number of our
10 Rule 10 requests over many months, where further
11 disclosure may be outstanding, including in
12 respect of attachments to emails or further
13 emails in a chain, for example. We're very
14 grateful to the Inquiry for how it's explored
15 those requests in advance of witnesses appearing
16 before the Inquiry.

17 Some documents have been released late, both
18 to witnesses and to Core Participants. It's
19 been an ongoing problem, and in the light of the
20 evidence of Mr Foat and the exchanges over the
21 past week, we share the view of Mr Beer that the
22 position in respect of the treatment of family
23 and duplicate documents is a maddening state of
24 affairs.

25 So it is with real regret, sir, that we also

50

1 (11.25 am)

2 **MR HENRY:** Hello, sir.

3 **SIR WYN WILLIAMS:** Good morning, Mr Henry.

4 **MR HENRY:** Thank you, sir. May I begin?

5 **SIR WYN WILLIAMS:** Of course.

6 **Submissions by MR HENRY**

7 **MR HENRY:** Sir, sometimes with a vexatious machine,
8 you just have to turn it off at the mains. The
9 Core Participants we represent are unanimous
10 that this Phase should be adjourned, and that no
11 further evidence, including expert evidence, be
12 called until September and I shall explain why
13 towards the close of my submissions, sir.

14 But may I very briefly touch on last
15 October. The old proverb goes: if a man
16 deceives me, once shame on him; if twice, shame
17 on me.

18 You were within your rights to give the Post
19 Office one chance and you did so, last October,
20 and the prescient individuals I represent won't
21 say "I told you so" and neither will I, but they
22 knew the future, sir, for the past they knew.

23 The mental scars they'd suffered, their bodies
24 broken in health, tormented by physical pain,
25 and particularly the marred existence, bleak and

52

1 pitiless, that they had endured for some of them
 2 approaching two decades because of the Post
 3 Office's long deceit, unthinking cruelty and
 4 culture of secrets, cover-ups and lies.

5 This was intimately known to the Core
 6 Participants which, together with Ms Page,
 7 I represent before you. They knew their
 8 oppressor better than anyone else, for their
 9 bore the wounds that it had inflicted callously
 10 and, through me, they told you of the nature of
 11 the beast you were contending with last October:
 12 a vicious institution that had crushed them,
 13 suffocated their right to a fair trial, putting
 14 them -- some of them -- in prison or subjecting
 15 them to penury, some of them for over two
 16 decades.

17 Now, this institution, sir, you will recall,
 18 had misled the Court of Appeal Criminal Division
 19 in the case of *Butoy*, as recently as 2008. That
 20 subpostmaster was successful, however, in
 21 *Hamilton* in 2021. This institution had hazarded
 22 the civil litigation before Mr Justice Fraser,
 23 as he then was, only to fight tooth and claw,
 24 resisting the obvious limb 2 in *Hamilton*.

25 But after a series of civil trials and
 53

1 that typify the pain and anguish of those we
 2 represent. One is from Nichola Arch who says:

3 "I just thought I would write my views down
 4 as I am unable to attend tomorrow due to
 5 an operation I had last Monday. The harm of
 6 non-disclosure and/or delayed disclosure cannot
 7 be underestimated when it comes to the victims
 8 of this nightmare. For some, it takes you
 9 straight back to the time when you tried to
 10 defend yourself but constantly hit a brick wall
 11 that is called the Post Office, knowing the
 12 truth is there, but you constantly have no
 13 access to it.

14 "This is what justice looks like to all of
 15 us, a one way-ticket to nowhere. The Post
 16 Office have said they've learnt lessons and they
 17 continue to do this. Is this lesson
 18 a conspiracy and disrespect for the whole of our
 19 legal system? Being the guilty parties, I do
 20 not understand why the Post Office have so much
 21 slack given to them. It's almost like they
 22 continue to control the whole narrative. We are
 23 losing momentum in the Inquiry and changes have
 24 to happen now. You, sir [she says], have showed
 25 nothing but integrity, humanity and respect at
 55

1 appeals, you might have been forgiven for
 2 thinking that they would approach matters before
 3 you, this statutory Inquiry, with rigour,
 4 profound thought, ample resources and
 5 application, and maybe even a little humility.

6 It might therefore be thought that you were
 7 entitled to the essential incredulity that
 8 a public corporation, historically infected with
 9 the contagion of non-disclosure that had
 10 contaminated both civil and criminal justice,
 11 was unlikely to continue with reckless
 12 non-disclosure or manifest such flagrant
 13 incompetence before this Inquiry. No doubt such
 14 prospect seemed preposterous.

15 Well, in a sane world, a contrite Post
 16 Office would unhesitatingly comply with every
 17 order or stricture so that its errors could
 18 belatedly be reversed by striving humbly to
 19 uncover the truth, even if the damage to the
 20 Core Participants had been done. Even if their
 21 suffering could not be undone, honest humility
 22 by the Post Office would have meant something.
 23 But it was not to be.

24 At this point, sir, I will only read two of
 25 the messages that we have received. I pick two
 54

1 all times, yet it is being reciprocated with
 2 this disgraceful disrespect to the whole
 3 Inquiry."

4 You, sir, I repeat, using Ms Arch's words,
 5 have shown nothing but integrity, humanity and
 6 respect at all times, yet it is being
 7 reciprocated with this disgraceful disrespect to
 8 the whole Inquiry.

9 Then Janet Skinner, who -- and I'm grateful
 10 to Mr Schwarz:

11 "I completely understand the chair is not
 12 happy with this disclosure process from the Post
 13 Office, so are we all. Moreover, I'm extremely
 14 concerned about this situation. Why is the Post
 15 Office able to do this after years of
 16 withholding information? Why is it allowed to
 17 continue? This isn't the first time or the
 18 second time. I believe that there should be
 19 some sort of punishment for their behaviour and
 20 for their completely negligent behaviour towards
 21 this Inquiry. It's becoming the Post Office
 22 show again. The Post Office are well aware of
 23 their actions. Are they not intelligent enough
 24 to understand the rules?"

25 So that is what Janet Skinner and Nicki Arch
 56

1 have written to you, sir. This, I won't say,
 2 was always on the cards. That would be to
 3 underplay it, sir. This was, I'm afraid to say,
 4 inevitable. The Post Office were never likely
 5 to comply or tell the absolute truth in a tight
 6 corner and this now, after Rule 9s, which were
 7 sent at in 2021 and 2022, is the tightest of
 8 corners, you may think, that they are in.

9 They were not particularly, if I may pass
 10 this observation, inclined towards dredging up
 11 that which had been long buried or suppressed.
 12 The suggestion that their exercise was
 13 mechanistic -- when learned Counsel to the
 14 Inquiry made that perfectly reasonable,
 15 incontrovertible suggestion to Mr Foat, he
 16 seemed to adopt an approach of truculent
 17 umbrage. But I'm afraid it is mechanistic and
 18 these disclosure issues will derail this Inquiry
 19 unless, as I have invited you to, sir, you reset
 20 and repress the button.

21 Australia has recently had a Royal
 22 Commission into the terrible Robodebt scandal
 23 that has echoes of this terrible scandal but
 24 fortunately only lasted a quarter of its time.
 25 They had a definition of disclosure in that

1 transparency and responsible disclosure, so that
 2 the people responsible for these documents are
 3 identifiable and accountable ultimately for
 4 their production. Fieldwork must drive
 5 technology. We cannot have faith in technology
 6 alone.

7 I'm about to conclude, sir, but we cannot go
 8 on as if anything has happened. We cannot have
 9 business as usual. This is a watershed because,
 10 unless the Inquiry forces the Post Office to put
 11 its house in order, we can have no confidence
 12 that this will not happen again, and again, and
 13 again. But Counsel to the Inquiry is right that
 14 to instigate criminal proceedings now, would be
 15 premature and precipitate. But if the Post
 16 Office is given time between now and September,
 17 then, in the event of repetition, no further
 18 delay or excuse could be countenanced, and we
 19 respectfully submit that the whole apparatus of
 20 Section 21, Sections 35 and 36, should be used
 21 in a proportionate way.

22 We also adopt the suggestion by my learned
 23 friend Mr Stein that the CEO and general counsel
 24 need to be brought here so that they know that
 25 they must now -- and they are now compelled to

1 Royal Commission, which no doubt was in relation
 2 to privacy, but it helps because, although it
 3 might have been a definition devoted to the idea
 4 of privacy, it nevertheless rings true in this
 5 case:

6 "An entity discloses personal information
 7 where it makes it accessible to others outside
 8 the entity and releases the subsequent handling
 9 of the information from its effective control."

10 What we are having, sir, I respectfully
 11 submit, is the last gasp of the Post Office
 12 having matters taken from its effective control
 13 and, ironically, it has been the Post Office's
 14 blind reliance on technology that has caused or
 15 contributed to this problem, which is again
 16 grimly ironic for those we represent.

17 Mrs Shaikh's Freedom of Information Act
 18 request shows that old-fashioned fieldwork,
 19 talking to those who know or ought to have known
 20 the subject, should augment that mechanical,
 21 unthinking approach to technology, because
 22 lawyers are not investigators and investigators
 23 are not lawyers. But there should be
 24 an investigative arm brought in to augment and
 25 potentiate technology because there needs to be

1 devote all that is needed to ensure that there
 2 are effective resources in place and proper
 3 modes of operation but, also, sir, in order to
 4 ensure, because we have great concerns that this
 5 chance discovery, as a result of Eleanor
 6 Shaikh's intervention, might reveal that
 7 Phases 2 and 3 are likewise compromised, and so,
 8 therefore, we invite you to serve Section 21
 9 notices in respect of all past and present
 10 Rule 9s.

11 It surely cannot be seriously disputed that
 12 the Post Office's methodology so far is less
 13 than optimal: blind, unthinking, mechanistic
 14 approach to keyword searches. That is why we
 15 say that there are four matters that are of
 16 considerable concern now, which justify the
 17 adjournment until September.

18 The first, Phases 2 and 3 are probably
 19 likewise compromised and they echo and bleed
 20 into all of the other phases that follow,
 21 particularly Phase 4, and it will happen again,
 22 unless the button is reset.

23 Secondly, sir, investigative interviewing
 24 needs to be deployed. The Post Office was
 25 probably shocked at the effectiveness of Second

1 Sight but Second Sight's methodology in
2 uncovering this scandal, a very, very
3 considerable length of time ago, was because of
4 its pre-occupation with fieldwork as well as
5 technology.

6 Sir, so far as weeks 3 and 4, we
7 respectfully submit that the whole of this phase
8 should be postponed. I'll deal with expert
9 evidence separately but Jan Holmes is a case in
10 point. You will remember -- or perhaps
11 I flatter myself -- that when I asked him
12 questions on 16 November 2022, I was concerned
13 at an extraordinary coincidence that the RMG
14 board was discussing, on the 14 May 2021,
15 serious structural flaws in EPOSS when he, quite
16 by chance, completely by coincidence, it seems,
17 and had nothing to do with his current job at
18 the time, was recalling the report that he wrote
19 with Mr David McDonnell which was dealing
20 precisely with those flaws in EPOSS. The
21 references on Relativity are RMG00000009 and
22 FUJ00080690. So we believe that there is
23 a half-open can of worms there.

24 But the fourth point, sir, is the privilege
25 against self-incrimination and the privilege

61

1 **SIR WYN WILLIAMS:** I was simply thanking you,
2 Mr Henry, for your submissions.

3 I understand that the NFSP is present and
4 wishes to make submissions. So I will presume
5 they are next in the batting order.

6 **MR BEER:** That's right, sir, it's Ms Watt.

7 **SIR WYN WILLIAMS:** Yes. Good morning, Ms Watt.

8 Submissions by MS WATT

9 **MS WATT:** Good morning, sir, and thank you for the
10 opportunity to make oral submissions on behalf
11 of the NFSP, in light of the document disclosure
12 issues and related failures on the part of the
13 Post Office.

14 While the present hearing on these issues
15 arises from the recent evidence and
16 correspondence in late June and early July, the
17 NFSP notes with considerable and serious concern
18 that this most recent episode follows on from
19 ones earlier in the year, also since 2022 and
20 even since 2021, all as very clearly narrated in
21 the Chair's directions to the Post Office.

22 Sadly, the NFSP has to submit here that, in
23 light of its own ongoing and regular dealings
24 and negotiations with the Post Office, which it
25 has to have, the present situation just does not

63

1 against self-incrimination affects a number of
2 these witnesses and Counsel to the Inquiry has
3 already raised this but, fundamentally for us,
4 the foundation stone for that, of course, would
5 be the expert evidence of Mr Atkinson. You will
6 note -- I think the Irish expression is
7 "cute" -- how cute Mr Marsh was in drawing
8 concerns or briefing, as it were, against that
9 report, by saying that the expert didn't have
10 all the relevant information. Again, a grim
11 irony in the context of this case or this
12 Inquiry.

13 So it is for all of those reasons, sir,
14 expressing as I do, our heartfelt gratitude to
15 you, sir, and to your Inquiry Team, and
16 recognising as well that you have done all you
17 could to avoid this but that, nevertheless now,
18 there must be sanctions in the background to
19 ensure compliance, but it would be unreasonable
20 to have that approach just imposed now upon the
21 Post Office. They must be given further time in
22 order to satisfy you that we can proceed again
23 in September without another calamitous
24 interruption.

25 **MR BEER:** Sir, I think you're still on mute.

62

1 come as a surprise.

2 The NFSP recognises that the immediate
3 practical issues facing the Inquiry and its Core
4 Participants is whether or not to continue with
5 the evidence hearings as scheduled and to hear
6 from important witnesses, in the knowledge that
7 the Post Office has not disclosed all documents
8 which may be relevant to those witnesses. This
9 inevitably impacts on the questions which may or
10 can be asked of those witnesses and the evidence
11 they will give.

12 The NFSP is concerned that the present
13 situation caused by the Post Office's document
14 disclosure failures affect the Inquiry's ability
15 to get to the whole truth of what actually took
16 place and how and why it took place.

17 The NFSP firmly believes that Phase 4 of the
18 Inquiry is a critical one. It is the one where
19 the actions taken by the Post Office against
20 subpostmasters and others, the policy making,
21 the audits, investigations, the civil and
22 criminal proceedings, knowledge of and
23 responsibility for failures and investigation
24 and disclosure, are front and centre. The NFSP,
25 along with other Core Participants and the

64

1 general public, wants to know how the
2 organisation which it trusted broke that trust.

3 The witnesses the Inquiry is due to hear
4 from this week are -- and the following week,
5 but particularly this week -- in the NFSP's
6 submission, critical to understanding what
7 happened and why to so many postmasters,
8 assistants and Crown Office employees, whose
9 lives have been totally destroyed by Horizon and
10 the actions of the Post Office, all as set out
11 by counsel for the Core Participants already
12 this morning.

13 These witnesses include the Post Office Head
14 of Security and the Head of the Criminal Law
15 Team. They are key witnesses.

16 The NFSP appreciates that all parties to the
17 Inquiry will have spent time and effort in
18 preparation for this set of evidence hearings
19 and, as it set out in its opening statement,
20 last year, it's committed to assisting the
21 Inquiry in any way it can and, at this point,
22 the NFSP simply wishes to thank you, sir, and
23 the Inquiry Team for all that you have done so
24 far.

25 But it is a small organisation of just over
65

1 on the live link and prepared closing
2 submissions.

3 That's because, for the NFSP, along with all
4 of the other Core Participants, it is of real
5 importance that the Inquiry gets to the truth of
6 all that went wrong with Horizon from start to
7 finish. This is because, along with so many
8 others, the NFSP at the time trusted the Post
9 Office, believed what it said when it said that
10 Horizon was the right system to ensure the
11 viability of post offices across the UK and that
12 it worked properly.

13 As it turned out, the NFSP and everyone else
14 was misled and that is why the evidence of these
15 forthcoming witnesses who were central to
16 prosecution and decisions is important to all.

17 If there are other documents out there which
18 are relevant, which are important, which may
19 change the questions to be asked, which may
20 change the evidence to be given, but which the
21 Inquiry has not yet been given by the Post
22 Office, the question may well be asked: how can
23 the Inquiry get to the truth of what happened?
24 The NFSP believes the evidence of the
25 forthcoming witnesses is of critical importance
67

1 20 employees and with many ongoing
2 responsibilities to the postmasters of today,
3 including the ongoing business relationship it
4 requires to have with the Post Office to ensure
5 the proper remuneration and treatment of
6 postmasters.

7 But while it may be small, it has
8 nonetheless dedicated itself to the work of the
9 Inquiry, providing thousands of documents both
10 in response to Rule 9 requests and voluntarily,
11 which it hopes will assist the Inquiry.

12 The NFSP has, as with all other parts of the
13 Inquiry to date, dedicated time and effort to
14 responding to the Inquiry's requests, redaction
15 requirements, reviewing documents on Relativity,
16 reviewing witness statements, drafting and
17 submitting many Rule 10 questions for those
18 witnesses, appreciating others have done that
19 too.

20 While many of the questions submitted have
21 been adopted into questioning by counsel for the
22 Inquiry and with geography and resources
23 preventing regular in-person attendance at the
24 Inquiry, the NFSP and its legal representatives
25 have nonetheless watched every evidence session
66

1 in getting to that truth.

2 What is also of the gravest concern to the
3 NFSP is that, despite all the recent
4 explanations from the representatives of the
5 Post Office and perhaps a late realisation on
6 the part of the Post Office that the game is
7 well and truly up in terms of disclosure and
8 this Inquiry, it is said in the most recent
9 correspondence for the Post Office -- at least
10 I think that was the most recent correspondence,
11 I have slightly lost track -- the one of 7 July,
12 paragraph number 5, that says no one knows how
13 or why all this has happened or who might be
14 responsible for it and, of course, it's not
15 believed to be anyone at the Post Office who
16 gave such instructions.

17 Unfortunately, this has a hollow ring for
18 the NFSP, and it sounds like for others too this
19 morning, in the light of all that has been
20 uncovered to date by the Inquiry. The Inquiry
21 may excuse the NFSP, in light of its experience
22 of what it was repeatedly told about Horizon at
23 the time, for finding all of this difficult to
24 accept from the Post Office.

25 The NFSP understands it will be important
68

1 for the Inquiry to establish just how all of
2 this document disclosure issue has happened, due
3 to the impact on the Inquiry's work, the Core
4 Participants' work and the public interest. It
5 is actually concerned that the disclosure issue
6 and all that has come out threatens to become
7 a Horizon-type issue all of its own.

8 The NFSP has sadly come to the conclusion
9 that the current disclosure issues are
10 reflective of the Post Office of today and that
11 it is not much different to the one which
12 oversaw the Horizon scandal.

13 The NFSP has firsthand experience of the
14 Post Office of today. Perhaps one of the
15 organisations as part of this Inquiry that
16 actually does have to deal with the Post Office,
17 week in and week out. Horizon, what we might
18 call "Bonus Gate", the recent FOI disclosure
19 which revealed the racist language and attitudes
20 behind the scenes and now the disclosure issues
21 feed into a real concern that what is said and
22 done by the Post Office today cannot, for the
23 NFSP at least, be taken at face value.

24 It has to work with the Post Office to bring
25 issues facing postmasters today, such as

1 present is governance. While the Inquiry has
2 heard from a series of government ministers who
3 at various times have had responsibility for the
4 Post Office, the NFSP believes that recent
5 events, in particular Bonus Gate, demonstrates
6 a particular and ongoing failure in governance
7 as does the present disclosure situation.

8 This week, the NFSP will be at a Westminster
9 Hall cross-party debate being hosted by Marion
10 Fellows MP on the management culture of the Post
11 Office, in light of the recent revelations on
12 Bonus Gate and the non-disclosure of documents
13 to this Inquiry. For the NFSP, the question
14 which might well be asked -- and potentially for
15 others -- is: is this is an organisation that is
16 truly fit for purpose? Might there not be
17 a need to rip it up and start again?

18 Ultimately, the NFSP understands the chair
19 will have to make decisions which combine the
20 need to make progress with the need to ensure
21 the best evidence is obtained. There is a real
22 concern about the fact there are other documents
23 which could well have an impact on the
24 questioning of witnesses and that will, in turn,
25 have an impact on the evidence to the Inquiry.

1 remuneration and financial resources,
2 consultation on new contracts and much more.
3 But at almost every turn, the NFSP finds things
4 change, important dates change, there are
5 reductions in leavers' compensation payments for
6 around 130 postmasters of about 60 per cent,
7 addendums are added to contracts on what the
8 Post Office states it no longer needs to consult
9 with the NFSP on.

10 Therefore, any trust that remains in the
11 Post Office of today, and that is very little,
12 and its willingness to change its culture is
13 very considerably foundering, if not gone.

14 We appreciate that some of these matters are
15 not directly related to the document disclosure
16 issue which the Inquiry is looking at right now
17 but it is said, in order to demonstrate the
18 wide-ranging impact that the events have in
19 relation to the Post Office, which have
20 unfolded, particularly at the Inquiry during
21 2023 and the effect they have on the work of the
22 NFSP on behalf of today's postmasters.

23 So for many, nothing really seems to change.

24 An important feature for the NFSP of all
25 that has gone wrong in the past and in the

1 It's understood that witnesses can be called
2 back. However, for the NFSP and others, the
3 forthcoming witnesses represent such
4 an important part of the Horizon story, there is
5 a strong argument that it may be better to wait,
6 gather in all the evidence and then question
7 these witnesses.

8 For those reasons, the NFSP considers, on
9 balance, that the preferable position is for the
10 witnesses and participants to have access to all
11 documents ahead of evidence giving for such
12 a critical chapter and therefore to adjourn the
13 Inquiry at this time.

14 Simply just in conclusion, sir, we would
15 adopt the position in relation to Duncan
16 Atkinson KC that his evidence ought to be heard
17 when the document disclosure issues are
18 resolved, in order to avoid any potential
19 criticism that he did not have all of the
20 necessary material that he needed to reach his
21 conclusions.

22 The NFSP supports the proposition put
23 forward by counsel earlier today of calling the
24 CEO and other relevant parties to give evidence
25 in the meantime, regarding what is happening,

1 how it has happened and what the involvement of
2 the Post Office officers has been in that.
3 If I can be of any further assistance, sir,
4 please do let me know.

5 **SIR WYN WILLIAMS:** No, thank you very much, Ms Watt.
6 That's absolutely clear.

7 Does that conclude the submissions on behalf
8 of any Core Participant who wishes to speak?

9 **MR BEER:** Yes, it does, sir.

10 **SIR WYN WILLIAMS:** Do you wish to say anything,
11 Mr Beer?

12 **MR BEER:** No thank you, sir.

13 **SIR WYN WILLIAMS:** Very well.

14 In the light of the oral submissions which
15 I have heard, I am clear that the correct course
16 is to adjourn the hearing of evidence in what
17 I will call weeks 2 and 3, and, for the
18 avoidance of doubt, that includes adjourning the
19 evidence of Mr Atkinson KC.

20 There is at least a possibility that the
21 direction which I issued in relation to the
22 witnesses who are due to give evidence in week 4
23 can be complied with and, for that reason,
24 I will keep under review whether or not we sit
25 in the last week of July. I won't delay

73

1 **MR BEER:** It is, sir, save that Alan Lusher, who is
2 a week 4 witness, should be treated effectively
3 as a week 2 and 3 witness.

4 **SIR WYN WILLIAMS:** Right. Thank you for that
5 correction. I will make that clear in my
6 written record of what I've said and my reasons.

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

8 **SIR WYN WILLIAMS:** Is Mr Hayward actually in the
9 building?

10 **MR BEER:** He is, sir. He's in the witness waiting
11 room at the moment.

12 **SIR WYN WILLIAMS:** Well, then please convey my
13 apologies to him that he has been brought here
14 but he won't be giving his evidence.

15 **MR BEER:** Sir, we certainly will. As you know, at
16 your direction, all of the witnesses for weeks 2
17 and 3 had been contacted, and informed that
18 today's hearing was taking place and that it may
19 have an effect on the ability of the Inquiry to
20 take their evidence over the next two weeks.
21 We'll set about now contacting them and telling
22 them of the outcome of today's hearing.

23 **SIR WYN WILLIAMS:** Thank you very much, Mr Beer.

24 I think it's probably better that I say what
25 I need to say about this whole saga in writing

75

1 a decision too close in time to it but, for the
2 moment, I do wish to preserve the possibility
3 that we don't lose that week.

4 Mr Stein, in particular, raised a number of
5 issues which he asked me to consider, which can
6 be considered ancillary to the direction which
7 I've just made, and I propose to deal with those
8 matters in writing, as I will give reasons for
9 my primary decision in writing, namely to
10 adjourn, as I've indicated.

11 So to recap, so that everyone is clear, we
12 will not hear evidence from any of the witnesses
13 scheduled for this week and next week in those
14 weeks. They will be rescheduled until after the
15 summer break.

16 I will keep under review whether or not we
17 sit in the last week of July to hear some or all
18 of the witnesses scheduled for that week and
19 I will give written reasons for those decisions,
20 together with my decision on what I have called
21 the ancillary matters, raised primarily by
22 Mr Stein but supported to a degree by other
23 members of the bar who have spoken.

24 I think that is clear, Mr Beer, but if it's
25 not, please tell me.

74

1 and after reflection, rather than produce what
2 might be newsworthy but ultimately not sensible.

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

4 **SIR WYN WILLIAMS:** So we will adjourn, to use the
5 old-fashioned language of the courts, I guess,
6 to a date to be notified to the parties, since
7 there is a degree of uncertainty about what will
8 happen next.

9 **MR BEER:** Yes. It may be that it's Tuesday,
10 25 July. That's the date for Mr Lusher but we
11 may be able to fill it with some other evidence.

12 **SIR WYN WILLIAMS:** Sure, yes. All right then.

13 Well, unless -- let's leave it in this way: that
14 unless my directions make it clear that that is
15 not going to happen, everyone should, for the
16 moment, proceed on the basis that there may be
17 a hearing on 25 July.

18 **MR BEER:** Yes. Thank you, sir.

19 **SIR WYN WILLIAMS:** Very well. That's it. Thank you
20 very much.

21 **MR BEER:** Thank you, good morning.

22 (12.03 pm)

23 (The hearing adjourned until a date to be confirmed)

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76

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18
19
20
21
22
23
24
25

INDEX

Discussion re disclosure issues	1
Submissions by MS GALLAFENT	26
Submissions by MR STEIN	31
Submissions by MR MOLONEY	49
Submissions by MR HENRY	52
Submissions by MS WATT	63

<p>MR BEER: [23] 1/4 1/7 18/18 18/20 19/16 20/8 21/3 21/12 23/9 24/13 25/12 62/25 63/6 73/9 73/12 75/1 75/7 75/10 75/15 76/3 76/9 76/18 76/21</p> <p>MR HENRY: [6] 51/18 51/21 51/23 52/2 52/4 52/7</p> <p>MR MOLONEY: [4] 49/12 49/18 51/6 51/15</p> <p>MR STEIN: [3] 31/6 31/11 48/25</p> <p>MS GALLAFENT: [5] 26/5 28/6 28/20 29/20 30/23</p> <p>MS WATT: [1] 63/9</p> <p>SIR WYN WILLIAMS: [39] 1/6 18/12 18/19 19/11 20/7 20/23 21/11 22/15 24/11 25/11 26/2 27/23 28/15 29/5 30/20 30/24 31/10 48/24 49/9 49/14 51/4 51/13 51/16 51/20 51/22 52/3 52/5 63/1 63/7 73/5 73/10 73/13 75/4 75/8 75/12 75/23 76/4 76/12 76/19</p> <p>'if [1] 38/18 'In [1] 38/3 'We [1] 37/14</p> <p>1</p> <p>10 [4] 15/9 50/7 50/10 66/17</p> <p>10.00 [1] 1/2</p> <p>10.32 pm [1] 5/12</p> <p>11 July 2023 [1] 1/1</p> <p>11.06 [1] 49/10</p> <p>11.08 [1] 51/24</p> <p>11.25 [2] 51/22 52/1</p> <p>12 [2] 14/12 15/10</p> <p>12.03 [1] 76/22</p> <p>130 [1] 70/6</p> <p>14 [1] 15/12</p> <p>14 August 2023 [2] 8/23 9/13</p> <p>14 June 2002 [1] 15/12</p> <p>14 May 2021 [1] 61/14</p> <p>14 years [1] 36/11</p> <p>157 [1] 32/10</p> <p>16 December [1] 37/9</p> <p>16 February [1] 15/9</p>	<p>16 June [1] 6/20</p> <p>16 November [1] 61/12</p> <p>16 years [1] 35/6</p> <p>18 [1] 1/14</p> <p>18 months [1] 15/19</p> <p>1978 [1] 19/4</p> <p>2</p> <p>2 February 2023 [1] 39/20</p> <p>2.11 pm [1] 10/12</p> <p>20 employees [1] 66/1</p> <p>20 January [1] 15/13</p> <p>2000 [1] 3/25</p> <p>2002 [1] 15/12</p> <p>2005 [5] 17/9 17/20 18/24 21/10 45/22</p> <p>2006 [2] 18/25 21/10</p> <p>2008 [2] 46/16 53/19</p> <p>2016 [1] 37/12</p> <p>2019 [1] 37/9</p> <p>2020 [1] 46/21</p> <p>2021 [6] 15/8 15/17 53/21 57/7 61/14 63/20</p> <p>2022 [5] 15/9 15/11 57/7 61/12 63/19</p> <p>2023 [10] 1/1 6/21 8/20 8/23 9/13 14/16 15/13 15/25 39/20 70/21</p> <p>2024 [1] 34/15</p> <p>21 [12] 9/10 17/8 17/20 18/4 18/9 18/13 19/22 45/25 47/1 47/17 59/20 60/8</p> <p>22 [2] 37/20 38/1</p> <p>24 hours [1] 20/21</p> <p>24 July [2] 3/4 14/15</p> <p>25 July [2] 76/10 76/17</p> <p>26 November [1] 15/17</p> <p>26 November 2021 [1] 15/8</p> <p>28 April 2016 [1] 37/12</p> <p>28 July 2023 [1] 8/20</p> <p>3</p> <p>31 May 2022 [1] 15/11</p> <p>319 [1] 38/25</p> <p>35 [2] 22/14 59/20</p> <p>36 [7] 45/21 45/22 46/15 46/18 47/4 47/14 59/20</p> <p>4</p> <p>4 July [1] 3/17</p> <p>4,767 [2] 5/15 22/13</p> <p>4.00 [2] 12/21 19/20</p>	<p>4.04 pm [2] 11/25 22/7</p> <p>5</p> <p>5 July [2] 5/12 7/5</p> <p>555 [1] 35/13</p> <p>575 [1] 37/9</p> <p>576 [1] 37/24</p> <p>577 [1] 38/9</p> <p>6</p> <p>6 July [1] 5/18</p> <p>6.13 pm [2] 6/1 6/4</p> <p>60 per cent [1] 70/6</p> <p>618 [1] 46/22</p> <p>7</p> <p>7 July [5] 10/13 13/7 15/25 47/10 68/11</p> <p>9</p> <p>9s [2] 57/6 60/10</p> <p>A</p> <p>ability [2] 64/14 75/19</p> <p>able [12] 5/2 7/2 10/2 10/19 12/23 13/9 14/16 31/7 46/2 50/6 56/15 76/11</p> <p>about [27] 2/14 3/5 16/9 17/2 20/17 21/22 23/11 26/21 28/2 28/3 29/6 29/19 29/24 30/20 31/25 37/5 43/25 44/23 48/2 56/14 59/7 68/22 70/6 71/22 75/21 75/25 76/7</p> <p>above [4] 9/1 9/20 37/22 41/3</p> <p>absolute [1] 57/5</p> <p>absolutely [2] 44/10 73/6</p> <p>accept [2] 28/9 68/24</p> <p>accepted [2] 46/14 46/23</p> <p>access [2] 55/13 72/10</p> <p>accessible [1] 58/7</p> <p>Accordingly [1] 13/1</p> <p>account [3] 10/10 24/20 41/6</p> <p>accountability [1] 23/6</p> <p>accountable [1] 59/3</p> <p>acknowledge [1] 13/7</p> <p>across [1] 67/11</p> <p>Act [10] 3/25 9/11 17/9 17/20 18/25 19/4 21/10 45/22 48/5 58/17</p> <p>acting [2] 33/4 34/13</p>	<p>action [8] 2/7 2/17 2/21 15/21 15/23 39/15 40/22 42/5</p> <p>actions [9] 16/18 32/13 33/7 35/8 41/10 45/12 56/23 64/19 65/10</p> <p>activity [1] 7/3</p> <p>actually [5] 47/22 64/15 69/5 69/16 75/8</p> <p>ad [1] 12/11</p> <p>ad hoc [1] 12/11</p> <p>adamant [1] 48/18</p> <p>add [1] 2/24</p> <p>added [2] 11/20 70/7</p> <p>addendums [1] 70/7</p> <p>address [6] 7/6 11/8 13/16 14/14 31/3 45/7</p> <p>addressed [3] 6/18 14/23 20/9</p> <p>addressing [1] 6/16</p> <p>adjourn [7] 2/22 5/21 42/6 72/12 73/16 74/10 76/4</p> <p>adjourned [3] 41/25 52/10 76/23</p> <p>adjourning [1] 73/18</p> <p>adjournment [4] 6/14 16/14 16/22 60/17</p> <p>Admin [1] 46/22</p> <p>adopt [3] 57/16 59/22 72/15</p> <p>adopted [7] 12/10 12/10 15/21 15/23 22/17 27/2 66/21</p> <p>adopting [1] 29/10</p> <p>advance [3] 14/15 28/8 50/15</p> <p>advantage [1] 43/5</p> <p>advent [1] 29/15</p> <p>adverse [1] 21/6</p> <p>advocate [1] 27/6</p> <p>affairs [2] 17/2 50/24</p> <p>affect [4] 3/2 9/14 13/12 64/14</p> <p>affected [3] 5/14 13/13 34/2</p> <p>affecting [1] 35/5</p> <p>affects [1] 62/1</p> <p>affirmation [1] 24/22</p> <p>afraid [2] 57/3 57/17</p> <p>after [11] 2/24 5/22 14/21 39/10 42/1 51/8 53/25 56/15 57/6 74/14 76/1</p> <p>aftermath [3] 16/23 26/17 26/20</p> <p>afternoon [1] 12/21</p> <p>again [18] 27/16 30/8 33/12 35/14 35/24 35/24 49/22 49/24 51/22 56/22 58/15 59/12 59/12 59/13 60/21 62/10 62/22</p>	<p>71/17</p> <p>against [12] 17/18 20/2 21/7 25/9 32/13 38/1 41/10 45/9 61/25 62/1 62/8 64/19</p> <p>aggressive [1] 33/6</p> <p>ago [4] 3/21 15/19 21/23 61/3</p> <p>agree [2] 23/9 26/2</p> <p>agreed [1] 31/4</p> <p>agreement [1] 31/6</p> <p>ahead [1] 72/11</p> <p>air [1] 34/6</p> <p>akin [1] 29/11</p> <p>Alan [3] 2/10 13/20 75/1</p> <p>Alan Lusher [3] 2/10 13/20 75/1</p> <p>Alison [2] 2/9 23/19</p> <p>all [57] 1/19 1/25 7/3 8/8 8/18 9/1 19/19 20/20 25/12 27/18 28/15 28/19 30/20 32/18 34/17 36/6 37/23 40/6 40/9 41/4 42/6 51/8 51/10 51/13 55/14 56/1 56/6 56/13 60/1 60/9 60/20 62/10 62/13 62/16 63/20 64/7 65/10 65/16 65/23 66/12 67/3 67/6 67/16 68/3 68/13 68/19 68/23 69/1 69/6 69/7 70/24 72/6 72/10 72/19 74/17 75/16 76/12</p> <p>allegation [1] 19/13</p> <p>alleged [1] 41/10</p> <p>allow [1] 9/21</p> <p>allowed [3] 40/19 42/10 56/16</p> <p>almost [2] 55/21 70/3</p> <p>alone [1] 59/6</p> <p>along [3] 64/25 67/3 67/7</p> <p>alongside [1] 49/5</p> <p>already [9] 6/13 25/7 29/21 30/17 42/14 44/21 49/6 62/3 65/11</p> <p>also [12] 13/13 13/23 17/19 40/24 43/14 45/5 50/2 50/25 59/22 60/3 63/19 68/2</p> <p>alternative [1] 28/3</p> <p>alternatives [5] 26/13 27/1 27/11 27/24 28/10</p> <p>although [4] 7/17 20/11 45/2 58/2</p> <p>always [8] 32/21 33/1 33/16 33/18 33/25 35/15 42/19 57/2</p> <p>am [8] 1/2 28/2 31/4 31/7 51/24 52/1 55/4</p>
---	---	---	--	---

A	apply [3] 17/21 18/25 19/10	attendance [2] 48/3 66/23	50/17 50/19 51/9 54/1 54/20 57/11 58/3	both [5] 18/22 19/13 50/17 54/10 66/9
am... [1] 73/15	appreciate [2] 28/21 70/14	attention [2] 3/22 23/25	58/13 65/9 66/21 67/21 68/19 73/2 75/13 75/17	bound [1] 21/1
ample [1] 54/4	appreciates [1] 65/16	attitudes [1] 69/19	audits [1] 64/21	breach [1] 16/11
analyse [1] 11/17	appreciating [1] 66/18	audits [1] 64/21	augment [2] 58/20 58/24	break [9] 2/24 5/22 42/1 49/15 51/16 51/17 51/18 51/25 74/15
analysis [1] 23/20	approach [17] 4/15 12/9 12/11 12/11 14/10 18/24 22/17 22/18 37/5 46/12 47/20 47/21 54/2 57/16 58/21 60/14 62/20	August [3] 8/23 9/13 34/15	Beer [9] 18/12 22/15 24/11 30/25 40/5 50/21 73/11 74/24 75/23	Breeden [1] 2/10
ancillary [2] 74/6 74/21	approached [1] 48/17	August 2024 [1] 34/15	before [15] 3/8 8/21 13/4 19/16 25/1 27/15 32/6 39/4 39/12 40/15 50/16 53/7 53/22 54/2 54/13	Brian [1] 19/1
Andrew [3] 2/8 7/16 19/20	approaching [1] 53/2	Australia [1] 57/21	begin [1] 52/4	brick [1] 55/10
anger [1] 35/8	appropriate [6] 22/24 23/2 25/22 30/2 46/15 47/11	available [5] 8/11 19/13 21/9 38/14 41/4	behalf [5] 27/17 45/10 63/10 70/22 73/7	briefing [1] 62/8
anguish [1] 55/1	April [1] 37/12	avoid [2] 62/17 72/18	behaviour [4] 38/21 40/3 56/19 56/20	briefly [1] 52/14
another [8] 4/8 34/10 34/20 35/4 35/16 36/3 42/18 62/23	Arch [2] 55/2 56/25	avoidance [1] 73/18	being [24] 1/10 4/22 7/6 11/2 13/9 13/17 13/21 13/23 14/16 15/6 20/16 20/16 20/22 31/15 31/16 32/15 34/1 40/19 42/8 42/21 55/19 56/1 56/6 71/9	bring [1] 69/24
answer [5] 19/9 19/21 37/25 38/18 44/2	Arch's [1] 56/4	aware [3] 17/8 39/16 56/22	behind [3] 23/21 28/25 69/20	brings [1] 33/12
anticipate [2] 7/17 28/12	are [86]	away [3] 30/16 35/15 43/1	being [24] 1/10 4/22 7/6 11/2 13/9 13/17 13/21 13/23 14/16 15/6 20/16 20/16 20/22 31/15 31/16 32/15 34/1 40/19 42/8 42/21 55/19 56/1 56/6 71/9	broke [1] 65/2
anticipated [2] 12/23 31/1	argument [1] 72/5	awful [1] 49/21	belatedly [1] 54/18	broken [1] 52/24
anticipates [2] 14/13 14/16	arise [1] 31/20	B	belief [1] 40/12	brought [4] 3/6 58/24 59/24 75/13
anxiety [1] 32/18	arisen [1] 2/2	back [4] 33/12 36/10 55/9 72/2	believe [5] 31/6 32/1 32/2 56/18 61/22	build [1] 41/1
any [36] 2/18 8/13 9/5 9/14 10/3 10/4 10/10 13/8 13/14 14/4 14/9 14/19 15/22 17/9 17/10 27/15 28/11 29/18 32/20 32/25 35/1 38/4 38/12 41/21 43/14 44/13 44/15 44/15 47/17 49/8 65/21 70/10 72/18 73/3 73/8 74/12	arises [1] 63/15	backed [2] 20/13 48/6	believed [2] 67/9 68/15	building [1] 75/9
anyone [3] 28/7 53/8 68/15	arising [2] 4/14 30/8	background [2] 3/16 62/18	believes [3] 64/17 67/24 71/4	built [1] 37/2
anything [9] 17/1 20/15 22/19 25/23 28/15 29/2 33/3 59/8 73/10	arm [1] 58/24	backing [1] 46/14	believing [1] 33/3	bunch [1] 24/16
apologies [5] 16/4 27/16 49/24 49/25 75/13	arose [1] 30/7	backwards [1] 21/20	below [1] 37/18	buried [1] 57/11
apologise [2] 6/12 13/14	around [1] 70/6	badly [1] 35/5	Ben [1] 3/18	business [5] 10/20 11/6 12/16 59/9 66/3
apology [2] 26/7 32/7	as [89]	balance [3] 43/7 45/1 72/9	Bench [1] 46/16	but [61] 3/22 8/2 12/20 16/17 19/3 19/11 21/18 22/16 23/1 24/4 25/21 26/24 27/15 27/19 28/18 28/23 28/24 29/2 29/10 30/2 30/17 33/24 42/13 43/8 48/21 49/20 50/1 52/14 52/21 53/25 54/23 55/10 55/12 55/25 56/5 57/17 57/23 58/2 58/23 59/7 59/13 59/15 60/3 61/1 61/9 61/24 62/3 62/17 62/19 65/5 65/25 66/7 67/20 70/3 70/17 74/1 74/22 74/24 75/14 76/2 76/10
apparatus [1] 59/19	ask [7] 18/12 43/17 43/22 44/17 45/19 47/25 48/9	bar [1] 74/23	benefit [2] 3/11 50/8	Butoy [1] 53/19
apparent [2] 45/9 49/23	asked [8] 25/12 40/21 61/11 64/10 67/19 67/22 71/14 74/5	barristers [1] 39/2	best [2] 45/3 71/21 72/5 75/24	button [2] 57/20 60/22
Appeal [2] 40/16 53/18	asks [2] 33/5 40/16	based [1] 22/18	between [2] 16/2 59/16	C
appeals [1] 54/1	assessment [1] 22/11	basis [3] 38/4 38/13 76/16	Bick [2] 46/20 46/21	calamitous [1] 62/23
appear [3] 13/1 19/25 21/25	assist [2] 49/8 66/11	batting [1] 63/5	binary [1] 28/10	call [6] 9/23 10/9 19/11 42/10 69/18 73/17
appeared [1] 24/6	assistance [1] 73/3	battle [1] 39/10	bleak [1] 52/25	called [10] 3/3 11/2 11/7 11/23 42/21 44/19 52/12 55/11 72/1 74/20
appearing [1] 50/15	assistants [1] 65/8	be [149]	bleed [1] 60/19	calling [3] 42/12 44/24 72/23
appears [2] 18/21 44/4	assisting [1] 65/20	beast [1] 53/11	blind [2] 58/14 60/13	callously [1] 53/9
applicable [1] 39/14	assuming [1] 43/4	because [22] 3/22 8/10 16/19 19/24 22/25 25/5 25/6 26/16 27/24 30/12 33/20 34/8 43/11 53/2 58/2 58/21 58/25 59/9 60/4 61/3 67/3 67/7	blood [1] 34/7	came [2] 3/22 6/20
application [4] 18/9 19/22 47/7 54/5	assure [2] 29/20 44/19	become [1] 69/6	board [1] 61/14	can [26] 1/4 1/6 7/10 18/12 19/14 20/24
applied [1] 37/6	at [78]	becoming [1] 56/21	bodies [1] 52/23	
	Atkinson [13] 2/11 24/6 24/15 41/19 43/10 43/11 44/23 48/2 51/4 51/6 62/5 72/16 73/19	been [53] 1/8 2/20 3/21 6/4 7/7 7/11 9/24 12/8 12/9 12/10 12/22 13/15 14/9 14/21 14/23 15/18 18/23 20/19 22/4 22/9 22/21 22/22 22/24 23/1 23/12 24/8 24/22 26/23 36/14 37/16 40/4 40/21 44/8 44/15 45/17 47/1 49/19 50/5	body [1] 34/21	
	Atkinson KC's [1] 24/6	batting [1] 63/5	Bolsover [1] 2/9	
	attachments [1] 50/12	be [149]	Bolsover's [1] 23/19	
	attempt [2] 36/24 44/19	beast [1] 53/11	Bonus [3] 69/18 71/5 71/12	
	attend [2] 43/25 55/4	because [22] 3/22 8/10 16/19 19/24 22/25 25/5 25/6 26/16 27/24 30/12 33/20 34/8 43/11 53/2 58/2 58/21 58/25 59/9 60/4 61/3 67/3 67/7	book [1] 39/1	
		become [1] 69/6	bore [1] 53/9	
		becoming [1] 56/21		
		been [53] 1/8 2/20 3/21 6/4 7/7 7/11 9/24 12/8 12/9 12/10 12/22 13/15 14/9 14/21 14/23 15/18 18/23 20/19 22/4 22/9 22/21 22/22 22/24 23/1 23/12 24/8 24/22 26/23 36/14 37/16 40/4 40/21 44/8 44/15 45/17 47/1 49/19 50/5		

C	claimant [1] 34/10	56/11 56/20 61/16	30/1 46/6 74/6	could [15] 5/16 6/10
can... [20] 26/6 27/20	claimants [4] 33/24	completion [1] 7/2	considering [4] 2/7	7/21 7/22 11/21 19/10
29/1 29/20 32/22	34/2 34/4 37/11	compliance [3] 20/3	2/22 28/5 40/24	20/4 42/17 42/24 49/4
35/13 36/20 43/14	claimants' [1] 38/16	20/9 62/19	considers [1] 72/8	54/17 54/21 59/18
44/2 49/7 59/11 61/23	claiming [1] 40/18	complied [1] 73/23	consistent [1] 18/23	62/17 71/23
62/22 64/10 65/21	claims [3] 34/14	comply [14] 11/1	consistently [1] 36/9	counsel [14] 3/18
67/22 72/1 73/3 73/23	34/17 34/19	11/21 13/9 14/17	conspiracy [1] 55/18	26/15 39/3 43/12
74/5	claw [1] 53/23	17/13 17/22 17/24	constantly [2] 55/10	44/23 46/6 48/3 57/13
can't [6] 32/19 33/14	clear [14] 8/20 9/19	19/23 43/21 45/24	55/12	59/13 59/23 62/2
33/19 34/6 34/17	11/3 18/7 18/18 28/11	46/3 47/17 54/16 57/5	construction [1]	65/11 66/21 72/23
34/22	40/5 41/6 73/6 73/15	complying [1] 39/22	10/15	countenanced [1]
cannot [8] 36/12	74/11 74/24 75/5	compromised [2]	consult [1] 70/8	59/18
48/11 55/6 59/5 59/7	76/14	60/7 60/19	consultation [1] 70/2	couple [1] 41/19
59/8 60/11 69/22	cleared [1] 40/15	computer [1] 49/10	consulted [1] 50/1	course [19] 2/17 2/19
capable [2] 20/22	clearly [4] 9/2 16/16	concentrate [1]	contacted [1] 75/17	2/21 11/8 15/21 15/23
45/12	38/17 63/20	33/19	contacting [1] 75/21	24/13 24/18 28/6
cards [1] 57/2	Cleveleys [2] 3/6	concern [5] 60/16	contagion [1] 54/9	31/22 41/16 41/21
care [2] 34/10 34/25	42/2	63/17 68/2 69/21	contained [1] 6/2	42/5 48/24 49/4 52/5
carefully [1] 24/5	client [6] 33/5 34/20	71/22	contains [1] 19/4	62/4 68/14 73/15
carried [1] 4/17	35/10 35/16 36/3 42/3	concerned [5] 44/3	contaminated [1]	courses [2] 2/7 40/22
case [12] 8/17 9/8	32/1 32/8 32/11 32/17	56/14 61/12 64/12	54/10	court [16] 21/4 36/8
9/11 18/14 46/22	clients [13] 31/14	69/5	contempt [1] 47/16	36/15 37/3 39/15
47/11 49/16 51/5	32/1 32/8 32/11 32/17	concerning [3] 3/19	contending [1] 53/11	40/15 45/24 46/1 46/1
53/19 58/5 61/9 62/11	36/22 40/12 42/11	22/8 42/2	context [3] 18/20	46/14 47/2 47/8 47/16
cases [2] 9/21 46/15	44/13 45/5 45/10	concerns [5] 13/8	19/7 62/11	47/20 48/17 53/18
categories [1] 37/17	48/14 48/18	51/9 51/11 60/4 62/8	continual [1] 48/7	courts [3] 41/3 46/14
cause [2] 3/19 12/3	clip [1] 22/2	conclude [2] 59/7	continue [13] 5/3	76/5
caused [7] 10/5	clock [1] 49/10	73/7	10/8 27/19 31/18	cover [1] 53/4
13/15 35/19 39/8	close [4] 11/6 12/15	concluded [1] 38/8	35/22 35/24 41/14	cover-ups [1] 53/4
45/17 58/14 64/13	52/13 74/1	concludes [1] 15/20	51/2 54/11 55/17	Coyne [1] 13/25
causing [2] 33/17	closer [1] 34/23	conclusion [5] 18/3	55/22 56/17 64/4	created [1] 16/2
35/25	closing [1] 67/1	36/23 47/25 69/8	continued [2] 6/16	criminal [13] 7/9
cavalier [1] 37/5	closure [1] 30/2	72/14	12/2	17/14 19/12 19/17
caveats [1] 43/9	Co [2] 39/17 39/20	conclusions [1]	continuing [1] 36/1	20/4 20/5 20/13 41/3
cent [1] 70/6	coincidence [3] 32/1	72/21	contracts [2] 70/2	53/18 54/10 59/14
central [2] 40/7 67/15	61/13 61/16	conditions [1] 32/12	70/7	64/22 65/14
centre [1] 64/24	Colin [1] 14/1	conduct [7] 16/24	contrast [1] 21/21	critical [4] 64/18 65/6
CEO [3] 43/23 59/23	combine [1] 71/19	26/18 32/16 36/21	contributed [1] 58/15	67/25 72/12
72/24	come [6] 34/14 42/14	40/9 45/18 48/12	contribute [1] 54/15	criticism [2] 27/6
certainly [2] 29/14	43/6 64/1 69/6 69/8	conducted [1] 19/2	control [5] 17/11	72/19
75/15	comes [1] 55/7	confidence [2] 34/13	48/19 55/22 58/9	cross [2] 39/12 71/9
certainty [1] 44/13	coming [1] 25/4	59/11	58/12	cross-examined [1]
certify [1] 45/23	commencing [1] 3/4	confirm [4] 7/10 7/14	convey [2] 13/11	39/12
chain [1] 50/13	comments [2] 33/22	8/3 11/21	75/12	cross-party [1] 71/9
chair [7] 32/23 36/4	37/5	confirmed [1] 76/23	core [30] 1/7 1/22	Crown [1] 65/8
40/1 45/23 46/20	Commission [2]	confirming [1] 14/8	1/25 3/9 3/12 6/5	crucial [1] 23/5
56/11 71/18	57/22 58/1	confusion [1] 13/15	11/12 11/14 16/5 17/4	cruelty [1] 53/3
Chair's [1] 63/21	commits [1] 17/14	connection [1] 3/6	25/12 25/24 26/8 27/7	crushed [1] 53/12
chance [6] 23/2 23/7	committal [1] 47/16	conscious [2] 22/21	39/25 40/8 41/12	crystallised [1] 29/22
45/4 52/19 60/5 61/16	committed [1] 65/20	28/24	49/21 50/1 50/6 50/18	crystallising [2]
change [7] 14/19	company [1] 47/15	consequence [1]	52/9 53/5 54/20 64/3	29/16 29/21
67/19 67/20 70/4 70/4	comparison [1] 23/8	33/1	64/25 65/11 67/4 69/3	culture [3] 53/4
70/12 70/23	compel [1] 46/3	consequences [3]	73/8	70/12 71/10
changes [1] 55/23	compelled [1] 59/25	16/17 21/8 36/21	corner [1] 57/6	current [7] 6/8 14/2
chapter [1] 72/12	compensation [7]	consider [8] 9/22	corners [1] 57/8	16/1 43/11 47/22
cheap [1] 33/7	29/12 33/24 33/25	16/7 21/13 25/22 29/8	corporation [3] 18/16	61/17 69/9
Cipione [1] 43/13	34/5 46/8 49/5 70/5	45/19 46/11 74/5	19/10 54/8	currently [3] 14/13
circumstances [2]	competently [1] 44/9	considerable [3]	correct [1] 73/15	14/16 20/16
17/24 38/3	complainant [1]	60/16 61/3 63/17	correction [1] 75/5	culp [1] 34/9
civil [5] 3/5 53/22	39/25	considerably [1]	correspondence [9]	custody [1] 17/10
53/25 54/10 64/21	complete [3] 13/2	70/13	1/19 9/16 12/14 21/24	cute [2] 62/7 62/7
claim [4] 17/22 20/1	24/8 36/13	consideration [1]	28/23 37/23 63/16	cycle [1] 41/8
20/2 37/11	completed [2] 34/15	48/10	68/9 68/10	
	50/5	considered [4] 28/4	costs [2] 21/7 39/9	
	completely [4] 5/1			

D	demonstrate [1] 70/17	4/4 4/7 4/10 4/14 4/22 5/9 6/9 10/5 10/7 11/1 11/19 11/22 16/2 18/2 20/12 21/23 23/3 23/8 23/13 24/22 26/10 30/14 31/17 37/6 37/19 38/5 38/23 39/19 39/23 40/7 40/23 41/15 42/6 43/21 44/2 44/8 44/11 44/12 44/14 44/20 45/11 46/10 47/9 47/24 49/2 50/5 50/8 50/11 54/9 54/12 55/6 55/6 56/12 57/18 57/25 59/1 63/11 64/14 64/24 68/7 69/2 69/5 69/9 69/18 69/20 70/15 71/7 71/12 72/17 77/2	23/22 23/22 24/23 25/7 30/9 36/16 37/17 37/20 38/6 39/10 50/17 50/23 59/2 64/7 66/9 66/15 67/17 71/12 71/22 72/11	effective [3] 58/9 58/12 60/2
danger [1] 42/19	demonstrates [2] 38/22 71/5	43/21 44/2 44/8 44/11 44/12 44/14 44/20 45/11 46/10 47/9 47/24 49/2 50/5 50/8 50/11 54/9 54/12 55/6 55/6 56/12 57/18 57/25 59/1 63/11 64/14 64/24 68/7 69/2 69/5 69/9 69/18 69/20 70/15 71/7 71/12 72/17 77/2	51/4 51/6 63/25 69/16 71/7 73/7 73/9	effectively [1] 75/2
dangled [1] 42/8	deployed [1] 60/24	disclosures [1] 35/24	doesn't [2] 31/11 34/25	effectiveness [1] 60/25
dare [1] 16/21	deploying [1] 48/10	discovering [1] 26/20	doing [2] 22/22 33/16	efforts [4] 26/22 28/24 30/4 30/16
date [7] 8/21 9/24 66/13 68/20 76/6 76/10 76/23	derail [1] 57/18	discovery [1] 60/5	don't [9] 29/2 29/25 30/11 32/1 32/2 34/10 44/20 51/19 74/3	eg [1] 14/19
dated [6] 15/7 15/13 15/16 37/8 37/12 39/20	described [2] 4/21 10/14	discussing [1] 61/14	done [8] 20/22 29/12 33/3 54/20 62/16 65/23 66/18 69/22	eg the [1] 14/19
dates [1] 70/4	deserved [1] 46/25	Discussion [2] 1/3 77/2	Donnelly [1] 39/3	Eleanor [1] 60/5
David [1] 61/19	despairingly [1] 36/22	disgraceful [2] 56/2 56/7	doubt [7] 10/4 29/23 31/3 39/24 54/13 58/1 73/18	else [3] 22/19 53/8 67/13
day [5] 5/17 5/18 5/25 30/12 34/21	despite [1] 68/3	dishonest [1] 40/19	doubtless [1] 21/6	emails [2] 50/12 50/13
days [2] 8/21 39/12	destroyed [1] 65/9	disputed [1] 60/11	down [4] 25/2 33/15 46/9 55/3	emerged [1] 1/17
de [16] 4/17 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	detail [2] 40/4 46/9	disregard [2] 32/25 36/13	drafting [2] 19/19 66/16	emerges [1] 43/16
de [16] 4/17 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	details [1] 10/14	disrespect [3] 55/18 56/2 56/7	draw [1] 23/24	emphasise [4] 27/16 27/19 30/3 48/11
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	determine [3] 12/8 17/22 20/1	disruption [2] 39/9 45/17	dredging [1] 57/10	emphatically [1] 26/19
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	determined [1] 20/2	disturbing [2] 38/15 38/23	dress [1] 43/6	employee [1] 13/21
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	detrimental [3] 35/21 36/2 48/13	Division [2] 46/17 53/18	drill [1] 46/8	employees [3] 14/2 65/8 66/1
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	develop [2] 30/21 32/6	do [15] 3/2 5/2 17/1 27/20 29/18 47/3 51/17 55/17 55/19 56/15 61/17 62/14 73/4 73/10 74/2	drive [1] 59/4	enable [1] 48/6
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	developed [1] 32/12	document [8] 9/17 10/3 42/15 63/11 64/13 69/2 70/15 72/17	driven [1] 36/22	enables [1] 45/22
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	development [1] 22/23	documentation [3] 2/19 36/7 41/22	due [15] 2/19 5/17 8/18 8/22 10/22 11/7 13/17 31/19 32/12 35/8 41/21 55/4 65/3 69/2 73/22	enactments [1] 19/6
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	developments [2] 1/9 36/23	documents [61] 1/15 2/15 3/20 4/5 4/16 5/15 7/6 7/12 7/14 7/18 7/20 8/1 8/3 8/13 8/16 9/1 9/3 9/5 9/7 9/25 10/6 10/7 10/16 10/21 11/4 11/9 13/3 14/5 14/20 15/1 15/5 15/14 16/11 17/10 18/6 19/19 21/25 22/9 22/19 23/12 23/19	drive [1] 59/4	end [4] 1/18 17/4 22/8 32/20
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	deals [2] 9/14 16/9	do [15] 3/2 5/2 17/1 27/20 29/18 47/3 51/17 55/17 55/19 56/15 61/17 62/14 73/4 73/10 74/2	drill [1] 46/8	endured [1] 53/1
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	deal [5] 31/21 43/15 61/8 69/16 74/7	disruption [2] 39/9 45/17	drive [1] 59/4	energies [1] 30/4
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	dealing [1] 61/19	disturbing [2] 38/15 38/23	drill [1] 46/8	enforcement [1] 46/2
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	dealings [1] 63/23	disruption [2] 39/9 45/17	drive [1] 59/4	engaging [1] 26/19
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	dealt [4] 42/17 44/9 44/21 51/12	disturbing [2] 38/15 38/23	drill [1] 46/8	enough [2] 48/11 56/23
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	debate [1] 71/9	disruption [2] 39/9 45/17	drive [1] 59/4	enquiries [1] 11/19
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	decades [2] 53/2 53/16	disturbing [2] 38/15 38/23	drill [1] 46/8	ensure [9] 5/8 12/5 42/6 60/1 60/4 62/19 66/4 67/10 71/20
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	deceit [1] 53/3	disruption [2] 39/9 45/17	drive [1] 59/4	entirely [3] 25/21 30/18 38/12
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	deceives [1] 52/16	disruption [2] 39/9 45/17	drill [1] 46/8	entitled [1] 54/7
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	December [1] 37/9	disruption [2] 39/9 45/17	drive [1] 59/4	entity [2] 58/6 58/8
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	decided [1] 8/6	disruption [2] 39/9 45/17	drill [1] 46/8	episode [1] 63/18
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	decision [6] 5/20 27/15 42/23 74/1 74/9 74/20	disruption [2] 39/9 45/17	drive [1] 59/4	eponymously [1] 19/2
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	decisions [4] 1/18 67/16 71/19 74/19	disruption [2] 39/9 45/17	drill [1] 46/8	EPOSS [2] 61/15 61/20
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	dedicated [2] 66/8 66/13	disruption [2] 39/9 45/17	drive [1] 59/4	equally [1] 30/6
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	deepest [1] 27/16	disruption [2] 39/9 45/17	drill [1] 46/8	Error [6] 37/12 37/15 37/21 38/11 38/15 38/17
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	defective [2] 24/16 38/5	disruption [2] 39/9 45/17	drive [1] 59/4	errors [2] 1/11 54/17
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	defence [2] 19/12 20/6	disruption [2] 39/9 45/17	drill [1] 46/8	essential [1] 54/7
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	defend [1] 55/10	disruption [2] 39/9 45/17	drive [1] 59/4	essentially [1] 19/24
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	definition [2] 57/25 58/3	disruption [2] 39/9 45/17	drill [1] 46/8	establish [3] 4/9 41/6 69/1
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	degree [2] 74/22 76/7	disruption [2] 39/9 45/17	drive [1] 59/4	establishing [1] 4/3
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	delay [6] 10/5 35/19 39/8 39/22 59/18 73/25	disruption [2] 39/9 45/17	drill [1] 46/8	estimate [1] 22/13
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	delayed [1] 55/6	disruption [2] 39/9 45/17	drive [1] 59/4	even [10] 8/2 10/19 10/20 12/16 14/21 36/7 54/5 54/19 54/20 63/20
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	delays [1] 36/1	disruption [2] 39/9 45/17	drill [1] 46/8	
de-duplication [15] 5/13 6/18 7/7 8/16 9/7 10/17 12/4 12/9 13/11 13/14 13/18 13/22 14/6 14/14 14/25	deliberate [3] 32/5 35/20 36/24	disruption [2] 39/9 45/17	drive [1] 59/4	

E	68/21 69/13 experiences [1] 43/1 expert [6] 43/13 51/7 52/11 61/8 62/5 62/9 explain [1] 52/12 explained [2] 5/22 7/5 explanation [3] 12/5 43/19 43/25 explanations [1] 68/4 explore [1] 16/19 explored [1] 50/14 expose [1] 47/14 expressing [1] 62/14 expression [1] 62/6 extraordinary [1] 61/13 extremely [2] 10/7 56/13	fill [1] 76/11 fills [1] 34/13 financial [1] 70/1 find [3] 18/8 26/8 49/22 finding [1] 68/23 findings [2] 24/2 41/2 finds [1] 70/3 fine [1] 51/20 finish [1] 67/7 finished [1] 48/21 firmly [2] 29/21 64/17 first [9] 9/20 15/6 15/16 21/21 25/24 31/8 41/16 56/17 60/18 firsthand [2] 1/23 69/13 firstly [6] 1/19 2/7 4/14 10/25 17/7 43/9 fit [1] 71/16 fixed [1] 9/24 flagrant [1] 54/12 flatter [1] 61/11 flaws [2] 61/15 61/20 floor [2] 3/8 25/25 flow [2] 10/15 14/14 Foat [11] 3/18 4/2 4/12 4/19 6/22 43/19 44/17 44/24 48/3 50/20 57/15 focal [1] 31/23 focus [2] 13/17 46/17 focusing [1] 30/3 FOI [1] 69/18 follow [2] 31/17 60/20 following [7] 2/13 3/14 3/24 5/17 5/18 39/5 65/4 follows [4] 8/12 8/18 17/7 63/18 fools [1] 32/25 force [1] 36/6 forced [1] 39/8 forces [1] 59/10 forefront [1] 33/25 forgiven [1] 54/1 form [2] 38/20 38/22 former [3] 13/20 14/2 32/10 forms [1] 21/4 formulate [3] 11/15 11/17 50/7 forthcoming [3] 67/15 67/25 72/3 fortunately [1] 57/24 forward [2] 42/23 72/23 forwarding [1] 27/23 found [1] 35/17 foundation [1] 62/4 foundering [1] 70/13 four [3] 12/1 22/2	60/15 four-page [1] 12/1 fourth [3] 15/11 25/1 61/24 framework [2] 21/1 21/2 Fraser [7] 37/3 37/4 37/10 38/8 39/4 41/2 53/22 Freedom [2] 3/24 58/17 Freehills [4] 43/24 44/18 44/25 48/5 frequently [2] 29/13 29/14 fresh [1] 34/6 Friday [3] 10/12 10/24 12/24 friend [2] 40/4 59/23 friends [1] 31/7 frightening [1] 35/4 front [1] 64/24 fruit [1] 21/17 frustrate [1] 36/25 frustrated [1] 42/25 frustrating [1] 35/4 frustration [1] 35/9 FUJ00080690 [1] 61/22 Fujitsu [6] 25/18 37/14 37/18 37/21 37/22 41/5 fulfilled [1] 44/15 fulfilling [2] 45/4 45/5 fulfilment [1] 45/13 full [1] 39/23 fuller [1] 43/19 fullest [1] 50/8 fully [5] 7/1 14/15 15/25 30/18 46/25 fundamentally [1] 62/3 further [20] 1/9 5/12 10/5 10/11 11/8 11/18 11/25 29/2 33/22 34/21 38/13 43/15 43/22 49/8 50/10 50/12 52/11 59/17 62/21 73/3 Furthermore [1] 43/2 future [2] 8/22 52/22	gave [1] 68/16 general [4] 3/10 3/18 59/23 65/1 generally [1] 20/24 genuinely [1] 4/24 geography [1] 66/22 get [6] 11/12 30/9 34/23 35/14 64/15 67/23 gets [1] 67/5 getting [3] 33/6 33/19 68/1 give [26] 2/16 3/5 5/17 6/23 8/19 8/22 10/9 10/23 17/9 21/16 23/15 23/23 25/9 25/24 40/21 43/4 43/5 43/10 48/9 51/11 52/18 64/11 72/24 73/22 74/8 74/19 given [11] 1/12 22/14 24/8 25/6 42/14 47/9 55/21 59/16 62/21 67/20 67/21 gives [2] 43/12 44/12 giving [6] 3/8 28/18 34/9 43/2 72/11 75/14 go [4] 31/7 34/3 36/10 59/7 God's [1] 34/16 goes [1] 52/15 going [7] 5/24 8/8 24/2 26/23 28/25 36/7 76/15 gone [3] 4/3 70/13 70/25 good [7] 1/4 26/5 40/13 52/3 63/7 63/9 76/21 got [2] 19/16 24/15 governance [2] 71/1 71/6 government [1] 71/2 grateful [4] 28/20 48/25 50/14 56/9 gratitude [1] 62/14 gravest [1] 68/2 great [4] 32/11 35/18 39/1 60/4 Grenfell [1] 46/20 grim [1] 62/10 grimly [1] 58/16 grinding [1] 33/15 group [3] 35/11 37/7 42/4 guess [1] 76/5 guilty [1] 55/19
			H habitual [1] 39/22 had [39] 1/20 4/3 4/3 4/5 4/17 7/25 12/7 12/9 12/10 12/22 14/23 23/12 24/7	

H	53/23 57/15 61/15 61/18 72/19 72/20 74/5 75/10 75/13 75/14 He's [1] 75/10 Head [3] 24/24 65/13 65/14 heading [1] 15/20 Heads [1] 31/21 health [9] 31/20 32/12 32/19 35/5 35/7 35/18 36/18 48/13 52/24 hear [13] 1/4 2/8 25/4 25/22 27/15 30/21 31/5 41/17 49/14 64/5 65/3 74/12 74/17 heard [5] 3/17 27/9 71/2 72/16 73/15 hearing [19] 2/4 2/23 4/1 4/12 5/6 5/19 8/5 10/2 26/14 30/1 30/13 41/24 50/3 63/14 73/16 75/18 75/22 76/17 76/23 hearings [7] 6/13 29/13 46/8 49/1 49/5 64/5 65/18 heart [1] 27/4 heartfelt [1] 62/14 held [3] 5/19 18/24 46/17 Helliwell [1] 13/25 Hello [1] 52/2 help [1] 35/18 helps [1] 58/2 Henry [5] 51/17 52/3 52/6 63/2 77/6 her [2] 3/24 40/15 Herbert [4] 43/24 44/18 44/25 48/4 Herbert Smith [4] 43/24 44/18 44/25 48/4 here [7] 19/6 19/19 21/5 32/2 59/24 63/22 75/13 hesitate [4] 2/18 10/8 17/18 41/20 hesitation [1] 42/12 high [11] 32/18 36/8 37/3 39/15 40/18 45/23 46/1 46/14 47/7 47/20 48/17 highlighted [1] 50/9 highly [2] 23/14 23/22 him [5] 13/24 17/24 52/16 61/11 75/13 hindsight [1] 38/14 his [10] 4/19 4/21 6/22 24/9 36/5 51/7 61/17 72/16 72/20 75/14	historically [1] 54/8 history [2] 18/2 18/3 hit [2] 33/8 55/10 hoc [1] 12/11 holding [2] 29/25 30/13 holiday [1] 29/15 hollow [2] 49/25 68/17 Holmes [3] 14/1 40/14 61/9 honest [1] 54/21 honestly [1] 44/8 hope [3] 22/18 35/1 40/11 hopes [1] 66/11 Horizon [14] 22/23 37/8 37/15 38/5 41/7 41/9 65/9 67/6 67/10 68/22 69/7 69/12 69/17 72/4 hosted [1] 71/9 hours [1] 20/21 house [1] 59/11 how [18] 11/11 11/13 11/15 11/16 16/9 30/7 30/7 33/12 33/18 34/3 50/14 62/7 64/16 65/1 67/22 68/12 69/1 73/1 Howe [2] 39/17 39/20 however [7] 10/2 14/2 17/7 17/19 35/19 53/20 72/2 hugely [1] 48/12 human [2] 18/17 36/21 humanity [2] 55/25 56/5 humbly [1] 54/18 humility [2] 54/5 54/21 hundreds [2] 7/11 8/1 hurts [1] 33/9 husband [1] 40/15	I don't [3] 29/2 29/25 30/11 I emphasise [1] 27/16 I explained [1] 5/22 I feel [1] 34/8 I flatter [1] 61/11 I found [1] 35/17 I gained [1] 24/11 I go [1] 36/10 I guess [1] 76/5 I had [1] 55/5 I have [9] 18/11 22/3 29/12 35/6 35/23 57/19 68/11 73/15 74/20 I hear [1] 30/21 I issued [1] 73/21 I just [1] 55/3 I know [1] 33/23 I make [2] 9/19 32/7 I may [1] 57/9 I mean [1] 29/7 I need [1] 75/25 I note [1] 28/6 I noted [1] 23/11 I pick [1] 54/25 I propose [1] 74/7 I put [1] 27/23 I quote [1] 37/10 I read [1] 22/6 I recognise [1] 30/18 I remind [1] 37/7 I repeat [2] 39/19 56/4 I represent [2] 52/20 53/7 I respectfully [1] 58/10 I right [1] 28/2 I said [1] 51/16 I say [5] 22/16 29/6 30/12 42/7 75/24 I see [1] 48/22 I shall [2] 25/4 52/12 I should [4] 2/24 3/9 23/17 25/14 I so [1] 34/23 I start [1] 26/6 I stress [1] 22/25 I think [7] 18/18 48/21 62/6 62/25 68/10 74/24 75/24 I told [1] 52/21 I understand [1] 63/3 I very [1] 52/14 I was [3] 23/10 61/12 63/1 I will [10] 10/8 32/7 54/24 63/4 73/17 73/24 74/8 74/16 74/19 75/5 I won't [2] 57/1 73/25 I would [8] 21/12	23/9 23/24 25/1 25/8 36/4 51/18 55/3 I wrote [1] 27/25 I'd [2] 21/21 35/22 I'll [7] 2/25 6/5 17/6 19/11 30/20 49/12 61/8 I'm [21] 5/24 8/8 19/6 19/19 20/10 21/1 21/18 21/22 24/2 28/4 28/17 28/18 28/20 29/5 33/19 48/25 56/9 56/13 57/3 57/17 59/7 I've [6] 22/21 22/21 48/21 74/7 74/10 75/6 idea [1] 58/3 identifiable [1] 59/3 identified [11] 4/12 5/15 9/19 11/5 11/10 13/3 14/9 26/13 27/2 27/10 28/8 identify [6] 9/2 9/16 10/19 14/4 25/13 30/6 ie [8] 5/19 7/15 11/23 12/13 12/14 16/11 16/21 21/16 ie breach [1] 16/11 ie in [1] 7/15 ie it [1] 12/14 ie last [1] 5/19 ie there [1] 16/21 ie this [1] 12/13 ie week 3 [1] 11/23 ie what's [1] 21/16 if [32] 2/17 2/19 4/6 4/9 15/3 17/12 19/14 20/2 20/24 24/15 25/22 30/12 31/4 36/7 38/6 40/18 41/21 42/25 49/15 51/9 51/18 52/15 52/16 54/19 54/20 57/9 59/8 59/15 67/17 70/13 73/3 74/24 ii [2] 8/22 41/8 ill [1] 31/19 immediate [1] 64/2 immediately [1] 14/22 impact [9] 6/10 6/21 7/22 14/9 29/6 69/3 70/18 71/23 71/25 impacted [5] 6/13 7/7 10/16 14/5 14/19 impacts [1] 64/9 implementation [1] 41/7 importance [3] 29/22 67/5 67/25 important [12] 22/1 30/6 34/5 43/9 45/7 64/6 67/16 67/18 68/25 70/4 70/24 72/4 Importantly [1] 47/13
----------	---	--	---	---

I	instruments [1] 19/5 integrity [2] 55/25 56/5 intelligent [1] 56/23 intended [1] 13/11 interest [1] 69/4 interfere [2] 36/25 48/19 interference [2] 44/5 48/8 Interpretation [1] 19/4 interpreted [2] 18/14 18/16 interruption [1] 62/24 intervention [1] 60/6 interviewing [1] 60/23 intimately [1] 53/5 into [8] 8/9 24/20 36/6 46/9 57/22 60/20 66/21 69/21 investigate [1] 12/3 investigation [3] 7/9 23/5 64/23 investigations [1] 64/21 investigative [2] 58/24 60/23 investigators [2] 58/22 58/22 invidious [1] 16/6 invitation [1] 15/24 invite [5] 21/12 24/2 25/8 46/11 60/8 invited [1] 57/19 inviting [1] 21/18 involved [2] 27/13 27/18 involvement [2] 44/1 73/1 Inwood [1] 2/10 Ireland [1] 46/17 Irish [1] 62/6 ironic [1] 58/16 ironically [1] 58/13 irony [1] 62/11 is [197] isn't [2] 20/14 56/17 isolate [1] 10/16 issue [23] 5/7 5/13 6/17 6/20 7/1 8/7 10/17 12/4 13/11 13/14 13/18 13/22 14/6 14/14 19/17 20/12 30/5 30/7 40/7 69/2 69/5 69/7 70/16 issued [2] 9/9 73/21 issues [31] 1/3 1/16 2/2 3/2 4/13 4/20 4/24 6/9 6/12 7/7 8/16 9/8 16/1 26/20 31/17 31/24 37/8 39/19 44/3	44/20 45/11 57/18 63/12 63/14 64/3 69/9 69/20 69/25 72/17 74/5 77/2 it [160] it's [22] 7/24 17/23 18/1 19/22 20/16 21/24 22/12 25/21 32/21 33/20 49/10 50/14 50/18 55/21 56/21 63/6 65/20 68/14 72/1 74/24 75/24 76/9 item [2] 37/20 38/1 item 22 [2] 37/20 38/1 its [31] 4/14 4/15 5/3 6/3 6/21 16/4 16/17 16/24 26/18 32/19 38/23 41/8 41/15 45/3 45/4 45/5 47/15 54/17 57/24 58/9 58/12 59/11 61/4 63/23 64/3 65/19 66/24 68/21 69/7 70/12 70/12 itself [4] 11/5 35/14 38/22 66/8	justify [1] 60/16 K Kathleen [1] 39/3 KC [3] 24/15 72/16 73/19 KC's [1] 24/6 keep [3] 33/3 73/24 74/16 kept [1] 37/21 key [2] 35/25 65/15 keyword [1] 60/14 kicking [1] 32/23 kind [1] 46/16 King's [5] 39/2 43/12 44/23 46/6 48/2 knew [3] 52/22 52/22 53/7 know [12] 1/8 17/19 24/25 32/10 33/16 33/23 44/7 58/19 59/24 65/1 73/4 75/15 knowing [2] 33/14 55/11 knowledge [2] 64/6 64/22 known [10] 7/1 12/15 37/12 37/14 37/21 38/11 38/14 38/16 53/5 58/19 knows [1] 68/12	leave [3] 34/24 42/24 76/13 leavers' [1] 70/5 led [1] 4/4 left [1] 39/11 legal [10] 3/8 9/22 18/15 18/22 19/8 19/14 31/1 44/1 55/19 66/24 length [1] 61/3 Lenton [1] 14/1 Lenton-Smith [1] 14/1 less [2] 34/11 60/12 lesson [1] 55/17 lessons [1] 55/16 let [3] 26/2 28/10 73/4 let's [1] 76/13 letter [25] 5/11 6/2 6/3 6/4 6/7 6/16 7/5 7/24 10/11 10/13 12/1 12/25 13/5 13/7 14/23 15/4 15/20 22/7 26/11 28/17 37/11 37/13 37/25 38/10 39/20 letters [6] 16/8 18/11 19/25 22/3 26/22 29/10 level [1] 4/10 Leveson [1] 19/1 lies [1] 53/4 life [2] 34/11 41/8 life-cycle [1] 41/8 light [13] 2/3 4/20 6/20 8/6 32/20 40/5 50/19 63/11 63/23 68/19 68/21 71/11 73/14 like [7] 17/16 42/8 43/13 51/18 55/14 55/21 68/18 likelihood [1] 21/16 likely [5] 10/1 21/14 31/12 43/14 57/4 likewise [2] 60/7 60/19 limb [1] 53/24 limited [1] 41/8 link [1] 67/1 list [5] 1/16 2/23 22/14 37/17 37/20 listed [1] 41/25 listen [2] 17/3 49/23 literally [1] 29/13 litigation [4] 35/13 37/7 48/17 53/22 little [5] 21/19 39/11 51/18 54/5 70/11 live [2] 34/6 67/1 lived [1] 35/6 lives [2] 36/18 65/9 located [1] 21/25 Log [6] 37/12 37/15
	J James [1] 2/9 Jan [2] 14/1 61/9 Janet [2] 56/9 56/25 January [1] 15/13 Jason [1] 13/25 Jenkins [7] 5/14 5/16 5/21 14/3 14/24 22/8 22/11 Jenkins' [3] 5/23 6/14 23/11 job [1] 61/17 John [2] 2/9 7/16 judgment [3] 37/8 37/10 38/12 judgments [2] 37/2 41/2 July [21] 1/1 3/4 3/17 5/12 5/18 7/5 8/20 10/13 13/7 13/9 14/12 14/15 14/17 15/25 47/10 63/16 68/11 73/25 74/17 76/10 76/17 June [3] 6/20 15/12 63/16 just [19] 4/2 21/19 25/14 28/18 30/2 32/22 35/1 39/12 39/14 48/23 49/12 52/8 55/3 62/20 63/25 65/25 69/1 72/14 74/7 justice [10] 37/3 37/4 37/10 38/8 39/4 41/2 46/22 53/22 54/10 55/14	L land [1] 36/14 language [2] 69/19 76/5 large [1] 14/20 last [22] 1/14 1/18 2/5 5/6 5/19 5/25 10/12 15/3 15/12 19/20 23/10 24/1 35/1 35/6 52/14 52/19 53/11 55/5 58/11 65/20 73/25 74/17 lasted [1] 57/24 late [8] 10/5 21/23 22/19 23/3 35/24 50/17 63/16 68/5 later [7] 5/25 8/20 8/23 9/13 11/24 14/12 28/23 latest [2] 28/16 40/23 law [3] 18/18 36/14 65/14 lawyers [3] 32/24 58/22 58/23 lead [1] 7/22 Leading [1] 34/12 learned [4] 31/7 40/4 57/13 59/22 learnt [1] 55/16 least [9] 8/10 10/19 11/5 25/3 45/13 49/22 68/9 69/23 73/20		

L	Martin [1] 46/20	mind [2] 34/21 51/19	52/3 52/6 53/22 56/10	24/18 29/9 29/11
Log... [4] 37/21 38/11	material [6] 8/6 15/17	minds [4] 29/16	57/15 59/23 61/19	29/11 33/15 49/9
38/15 38/17	20/21 22/5 39/7 72/20	29/21 33/17 34/1	62/5 62/7 63/2 73/11	49/19 51/21 55/20
long [6] 11/11 11/13	matter [7] 17/11	mini [1] 44/11	73/19 74/4 74/22	69/11 70/2 73/5 75/7
11/15 11/16 53/3	21/12 25/21 29/22	mini-scandal [1]	74/24 75/8 75/23	75/23 76/3 76/20
57/11	30/18 31/11 34/3	44/11	76/10 77/4 77/5 77/6	must [13] 1/14 8/17
longer [1] 70/8	matters [11] 16/25	ministers [1] 71/2	Mr Atkinson [9]	9/2 9/12 9/16 16/21
look [6] 11/4 11/14	18/10 22/24 26/24	minutes [1] 49/13	41/19 43/10 43/11	19/7 41/13 48/19 59/4
11/16 15/3 18/1 21/19	28/21 54/2 58/12	misconduct [1] 21/8	44/23 48/2 51/4 51/6	59/25 62/18 62/21
looking [1] 70/16	60/15 70/14 74/8	misleading [1] 38/19	62/5 73/19	mute [1] 62/25
looks [1] 55/14	74/21	misled [2] 53/18	Mr Atkinson KC [1]	my [27] 4/20 19/19
loose [1] 20/24	may [46] 2/15 5/7 7/6	67/14	24/15	20/11 31/7 32/17
loosely [1] 19/12	7/20 8/17 9/8 9/11	mistakes [1] 1/11	Mr Beer [9] 18/12	32/18 32/18 33/20
lose [2] 33/17 74/3	9/21 13/13 15/11 16/7	mistresses [1] 32/11	22/15 24/11 30/25	34/21 34/23 35/5
losing [1] 55/23	16/18 17/3 22/5 22/24	mockery [1] 36/17	40/5 50/21 73/11	35/18 38/12 39/16
lost [4] 35/2 40/14	22/25 23/1 24/18	modes [1] 60/3	74/24 75/23	40/4 48/21 48/22
43/18 68/11	25/21 27/12 38/15	modules [2] 44/9	Mr Ben [1] 3/18	49/10 52/13 55/3
lot [1] 35/8	42/7 42/14 42/20	44/21	Mr Cipione [1] 43/13	59/22 74/9 74/20 75/5
loud [1] 16/20	42/22 43/5 46/4 46/15	Moloney [4] 49/15	Mr David [1] 61/19	75/6 75/12 76/14
louder [1] 33/8	50/11 52/4 52/14 57/8	49/17 51/14 77/5	Mr Duncan [1] 24/5	myself [1] 61/11
low [1] 7/19	57/9 61/14 64/8 64/9	moment [8] 3/1 17/1	Mr Foat [10] 4/2 4/12	
Lusher [4] 2/10	66/7 67/18 67/19	30/3 30/9 35/6 74/2	4/19 6/22 43/19 44/17	N
13/20 75/1 76/10	67/22 68/21 72/5	75/11 76/16	44/24 48/3 50/20	name [1] 25/5
	75/18 76/9 76/11	momentum [1] 55/23	57/15	named [1] 19/2
M	76/16	Monday [1] 55/5	Mr Hayward [1] 75/8	namely [1] 74/9
machine [2] 34/25	maybe [2] 49/13 54/5	month [1] 31/17	Mr Henry [3] 51/17	narrated [1] 63/20
52/7	McDonnell [1] 61/19	months [5] 1/14	52/3 63/2	narrative [1] 55/22
machinery [1] 20/13	me [21] 1/5 22/25	15/19 21/23 29/14	Mr Jenkins [3] 5/16	narrow [1] 4/2
maddening [2] 17/2	23/2 23/21 24/12	50/10	5/21 14/3	natural [4] 17/16
50/23	27/24 28/11 29/10	Moore [2] 46/20	Mr Jenkins' [2] 5/23	18/23 19/9 19/14
made [12] 1/12 1/13	31/3 34/13 34/22	46/21	23/11	nature [1] 53/10
37/4 39/17 42/7 45/25	35/18 35/21 36/2	Moore-Bick [2] 46/20	Mr Justice [2] 37/4	necessary [2] 7/3
46/5 47/5 47/13 49/25	49/12 52/16 52/17	46/21	46/22	72/20
57/14 74/7	53/10 73/4 74/5 74/25	more [14] 10/1 19/3	Mr Justice Fraser [6]	need [13] 7/15 7/18
mains [1] 52/8	mean [2] 19/8 29/7	20/23 22/18 29/9	37/3 37/10 38/8 39/4	7/20 8/3 10/22 14/3
maintained [1] 37/14	means [1] 36/7	29/11 29/11 31/12	41/2 53/22	29/8 44/6 59/24 71/17
majority [1] 42/4	meant [1] 54/22	33/15 34/5 34/7 49/24	Mr Lusher [1] 76/10	71/20 71/20 75/25
make [24] 2/1 9/19	meantime [1] 72/25	49/25 70/2	Mr Marsh [1] 62/7	needed [3] 11/4 60/1
15/22 17/6 21/21 24/2	measures [1] 36/5	Moreover [1] 56/13	Mr Moloney [2] 49/15	72/20
25/1 25/13 25/17	mechanical [1] 58/20	morning [11] 1/4 2/1	51/14	needs [5] 32/14 44/7
25/18 25/19 26/12	mechanistic [3]	25/14 25/20 26/5 52/3	Mr Nick [1] 43/23	58/25 60/24 70/8
28/11 32/7 42/16	57/13 57/17 60/13	63/7 63/9 65/12 68/19	Mr Read [3] 44/17	negative [1] 25/15
42/22 43/7 46/2 63/4	medication [1] 35/7	76/21	44/24 48/4	negligent [1] 56/20
63/10 71/19 71/20	meet [1] 16/9	morning's [1] 26/14	Mr Schwarz [1]	negotiations [1]
75/5 76/14	meeting [2] 35/9	most [5] 6/9 34/2	56/10	63/24
makes [2] 34/18 58/7	35/10	63/18 68/8 68/10	Mr Stein [4] 49/20	neither [1] 52/21
making [7] 20/10	member [1] 3/23	Mostyn [1] 46/22	59/23 74/4 74/22	never [1] 57/4
23/10 27/15 32/25	members [1] 74/23	motive [1] 24/19	Mr Wallis's [1] 39/1	nevertheless [3]
35/24 36/16 64/20	memories [1] 33/12	moving [1] 28/22	Mrs [2] 40/14 58/17	14/3 58/4 62/17
man [1] 52/15	memory [1] 24/9	MP [1] 71/10	Mrs Holmes [1]	new [5] 2/19 10/15
management [1]	mental [7] 32/12	Mr [70] 3/18 4/2 4/12	40/14	41/22 42/15 70/2
71/10	32/19 35/5 35/7 35/18	4/19 5/16 5/21 5/23	Mrs Shaikh's [1]	newsworthy [1] 76/2
manifest [1] 54/12	48/13 52/23	6/22 14/3 18/12 22/15	58/17	next [13] 2/12 7/4
many [15] 31/24	mention [1] 2/25	23/11 24/5 24/11	Ms [13] 26/2 26/4	11/23 20/21 29/14
32/11 34/3 34/24	messages [1] 54/25	24/15 30/25 31/9 37/3	27/23 30/22 46/6 53/6	41/18 49/11 50/4 51/3
36/16 36/22 40/12	met [2] 2/4 18/9	37/4 37/10 38/8 39/1	56/4 63/6 63/7 63/8	63/5 74/13 75/20 76/8
44/12 50/10 65/7 66/1	methodology [2]	39/4 40/5 41/2 41/19	73/5 77/3 77/7	NFSP [34] 63/3 63/11
66/17 66/20 67/7	60/12 61/1	43/10 43/11 43/13	Ms Arch's [1] 56/4	63/17 63/22 64/2
70/23	mickey [1] 32/23	43/19 43/23 44/17	Ms Gallafent [4] 26/2	64/12 64/17 64/24
Marion [1] 71/9	might [12] 18/15	44/17 44/23 44/24	27/23 30/22 46/6	65/16 65/22 66/12
marred [1] 52/25	24/14 28/13 54/1 54/6	44/24 46/22 48/2 48/3	Ms Page [1] 53/6	66/24 67/3 67/8 67/13
Marsh [1] 62/7	58/3 60/6 68/13 69/17	48/4 49/15 49/17	Ms Watt [3] 63/6 63/7	67/24 68/3 68/18
Marsh's [1] 24/1	71/14 71/16 76/2	49/20 50/20 50/21	73/5	68/21 68/25 69/8
	Mills [1] 46/21	51/4 51/6 51/14 51/17	much [17] 22/12	69/13 69/23 70/3 70/9

N	55/24 57/6 59/14 59/16 59/25 59/25 60/16 62/17 62/20 69/20 70/16 75/21 nowhere [2] 22/3 55/15 number [25] 4/4 7/14 7/17 7/20 8/3 10/21 14/19 15/1 15/7 15/10 15/13 15/14 16/25 17/6 18/21 22/9 22/12 26/21 32/8 37/5 37/8 50/9 62/1 68/12 74/4 number 12 [1] 15/10 number 3 [1] 15/13 number 5 [2] 15/7 68/12 number 6 [1] 37/8 numbers [1] 9/25	omission [1] 13/15 omissions [1] 45/12 on [90] once [1] 52/16 one [27] 2/12 4/2 15/7 16/16 19/16 23/12 24/4 27/6 27/11 29/5 31/21 32/17 33/6 34/11 37/7 39/2 44/13 48/23 52/19 55/2 55/15 64/18 64/18 68/11 68/12 69/11 69/14 ones [1] 63/19 ongoing [5] 50/19 63/23 66/1 66/3 71/6 online [1] 3/13 only [10] 3/22 6/20 9/21 12/23 22/14 28/1 39/9 53/23 54/24 57/24 open [3] 28/7 45/20 61/23 opening [1] 65/19 operation [2] 55/5 60/3 operational [1] 14/15 opinion [1] 51/8 opportunity [4] 2/1 9/22 28/18 63/10 oppressor [1] 53/8 optimal [1] 60/13 option [4] 41/24 43/8 45/3 50/2 options [5] 16/3 32/7 40/24 45/2 48/1 or [58] 1/14 8/16 9/3 9/7 9/10 9/15 9/17 9/25 10/6 11/18 12/8 12/11 14/2 16/14 16/22 17/11 17/23 18/16 21/4 21/10 22/1 23/7 24/3 24/24 27/6 27/25 31/12 31/12 38/7 40/18 45/19 45/25 46/3 46/25 47/18 48/19 50/12 51/3 53/14 54/12 54/17 55/6 56/17 57/5 57/11 58/14 58/19 59/18 61/10 62/8 62/11 64/4 64/9 68/13 68/13 73/24 74/16 74/17 oral [4] 6/22 41/17 63/10 73/14 order [15] 14/4 21/6 25/20 25/25 31/4 45/25 46/2 47/18 54/17 59/11 60/3 62/22 63/5 70/17 72/18 ordered [1] 47/2 orders [1] 47/5	ordinary [1] 21/3 organisation [4] 27/4 65/2 65/25 71/15 organisations [1] 69/15 original [1] 32/13 other [19] 10/3 16/5 19/5 24/17 27/7 28/12 30/21 36/24 38/20 39/25 60/20 64/25 66/12 67/4 67/17 71/22 72/24 74/22 76/11 others [9] 22/25 27/12 58/7 64/20 66/18 67/8 68/18 71/15 72/2 otherwise [4] 3/14 9/8 19/8 46/3 ought [6] 2/20 3/20 15/17 41/23 58/19 72/16 our [45] 1/13 1/15 3/22 7/5 8/11 11/18 13/7 13/15 15/2 15/7 15/8 15/10 15/11 15/12 18/6 26/10 26/11 26/15 26/25 27/3 28/10 30/4 31/14 32/1 32/6 32/8 32/11 34/1 35/10 36/14 36/22 40/21 42/3 42/11 44/13 45/5 45/10 48/14 48/18 49/7 50/1 50/9 51/6 55/18 62/14 ourselves [1] 18/8 out [23] 4/18 5/12 6/7 10/14 11/12 12/14 12/23 15/5 16/20 18/11 19/5 19/24 22/20 23/17 26/10 32/23 40/4 65/10 65/19 67/13 67/17 69/6 69/17 outcome [1] 75/22 outline [1] 3/10 outlined [1] 16/3 outlining [1] 14/10 outrage [2] 31/15 31/16 outset [2] 6/11 35/17 outside [1] 58/7 outstanding [1] 50/11 over [13] 1/13 20/20 21/14 25/4 29/14 36/16 41/7 41/18 50/10 50/20 53/15 65/25 75/20 overall [2] 32/6 49/7 oversaw [1] 69/12 own [7] 16/18 16/24 26/18 34/24 42/25	63/23 69/7 P page [5] 12/1 15/3 15/4 38/25 53/6 page 319 [1] 38/25 paid [1] 34/1 pain [2] 52/24 55/1 pains [1] 24/12 Paisley [1] 46/16 pandering [1] 33/7 paper [1] 34/18 par [1] 33/18 paragraph [4] 37/9 37/24 38/9 68/12 Paragraph 575 [1] 37/9 Paragraph 576 [1] 37/24 paragraph 577 [1] 38/9 parameters [1] 14/21 part [10] 8/11 23/5 35/12 37/7 41/12 45/13 63/12 68/6 69/15 72/4 Participant [1] 73/8 participants [26] 1/8 1/22 1/25 3/9 3/12 6/5 11/13 11/14 16/5 25/12 25/25 26/8 27/7 40/1 49/22 50/2 50/6 50/18 52/9 53/6 54/20 64/4 64/25 65/11 67/4 72/10 Participants' [1] 69/4 Participants's [1] 17/4 particular [10] 9/20 16/19 26/8 32/4 38/8 44/6 45/21 71/5 71/6 74/4 particularised [1] 38/4 particularly [8] 20/18 22/20 27/8 52/25 57/9 60/21 65/5 70/20 parties [4] 55/19 65/16 72/24 76/6 partner [4] 43/24 44/18 44/24 48/4 parts [2] 6/6 66/12 party [2] 46/3 71/9 pass [1] 57/9 passage [1] 38/25 past [6] 20/17 22/15 50/21 52/22 60/9 70/25 Paul [1] 2/10 Paula [1] 25/17 pay [2] 21/7 34/11 payments [1] 70/5 Pegler [1] 2/10 penury [1] 53/15
----------	---	--	---	--

P	points [3] 16/16 17/6 35/25	54/14	Prompt [1] 23/20	66/20 67/19
people [5] 30/21 33/17 34/8 36/18 59/2	POL [11] 13/8 13/12 13/20 14/2 14/8 14/13 14/16 14/22 15/22 34/24 41/18	prescient [1] 52/20	proper [2] 60/2 66/5	quickly [1] 4/25
people's [2] 29/16 29/20	POL's [1] 7/8	present [9] 17/17 24/20 60/9 63/3 63/14 63/25 64/12 71/1 71/7	properly [3] 44/8 47/1 67/12	quite [2] 45/9 61/15
per [2] 43/10 70/6	policies [5] 7/9 24/7 24/9 24/15 24/17	presented [1] 45/11	proportionate [2] 45/16 59/21	quote [2] 12/25 37/10
perceived [1] 28/13	policy [2] 24/23 64/20	preserve [1] 74/2	proportionate' [1] 38/7	quoting [1] 32/8
perfectly [1] 57/14	pool [1] 11/4	press [1] 24/12	proposal [1] 47/12	R
perhaps [5] 21/19 22/18 61/10 68/5 69/14	position [23] 6/8 6/23 6/25 7/13 8/2 10/25 11/21 12/13 14/18 16/6 16/13 20/15 23/11 26/7 26/11 27/17 27/21 29/18 47/23 49/21 50/22 72/9 72/15	prevent [1] 30/7	propose [2] 17/1 74/7	racist [1] 69/19
period [1] 29/16	possession [1] 25/7	preventing [2] 45/12 66/23	proposed [3] 14/10 40/22 45/1	raised [3] 62/3 74/4 74/21
periods [1] 9/19	possibility [4] 45/8 46/12 73/20 74/2	previous [2] 12/14 21/22	proposition [1] 72/22	ran [1] 39/9
permits [1] 17/20	possible [5] 4/25 9/23 12/8 14/11 36/5	primarily [1] 74/21	prosecution [2] 7/9 67/16	ranging [1] 70/18
permitted [1] 48/19	possibly [1] 27/20	primary [1] 74/9	prospect [2] 29/17 54/14	rapidly [1] 28/21
person [14] 17/10 17/12 17/14 17/20 18/13 18/15 18/17 18/20 18/23 19/7 19/9 19/14 45/24 66/23	post [159]	principal [1] 31/1	proverb [1] 52/15	rather [4] 20/24 27/7 30/5 76/1
person's [1] 28/12	postmaster [1] 49/21	principally [1] 3/11	provide [9] 7/2 10/6 29/1 43/19 43/25 47/10 48/5 49/3 51/7	rational [1] 38/13
personal [2] 23/6 58/6	postmasters [7] 27/8 65/7 66/2 66/6 69/25 70/6 70/22	prior [2] 10/19 10/22	provided [9] 2/20 8/17 9/1 9/12 11/11 37/16 37/21 41/22 51/10	re [5] 1/3 2/23 41/25 42/12 77/2
persons [1] 41/10	postponed [1] 61/8	prioritise [1] 5/3	providing [2] 12/4 66/9	re-calling [1] 42/12
persuade [2] 26/25 29/25	postponing [1] 5/23	prioritised [2] 7/15 8/4	provision [4] 16/10 16/15 19/4 46/19	re-list [1] 2/23
phase [11] 5/5 5/8 6/11 8/13 8/22 9/12 43/13 52/10 60/21 61/7 64/17	potential [2] 14/9 72/18	prioritising [1] 12/18	public [7] 3/23 5/24 46/24 48/20 54/8 65/1 69/4	re-listed [1] 41/25
Phase 2 [1] 43/13	potentially [10] 5/16 6/10 7/8 10/16 11/9 14/5 16/10 27/5 47/15 71/14	prison [1] 53/14	publicly [2] 8/10 29/17	reach [2] 18/3 72/20
Phase 4 [6] 5/5 5/8 8/13 8/22 9/12 64/17	potentiate [1] 58/25	privacy [2] 58/2 58/4	publish [1] 8/24	reaching [1] 23/4
phases [3] 60/7 60/18 60/20	power [1] 36/5	privilege [2] 61/24 61/25	punishment [1] 56/19	reaction [2] 17/16 20/12
Phases 2 [2] 60/7 60/18	powers [3] 17/8 17/18 46/13	proactive [1] 29/9	puppet [1] 42/9	reactions [1] 32/9
phrase [1] 4/21	practicable [1] 50/8	probably [4] 19/21 60/18 60/25 75/24	purpose [3] 4/1 4/6 71/16	read [11] 6/5 8/8 18/11 18/22 22/6 24/5 43/23 44/17 44/24 48/4 54/24
physical [1] 52/24	practical [1] 64/3	problem [3] 12/16 50/19 58/15	pursuant [1] 15/18	real [4] 50/25 67/4 69/21 71/21
pick [1] 54/25	practice [1] 29/11	problems [1] 4/8	pursue [3] 11/18 41/13 41/14	realisation [1] 68/5
piece [3] 1/23 1/24 34/17	pragmatic [1] 22/17	procedure [2] 47/13 48/6	put [14] 1/11 2/20 4/8 16/4 19/15 20/24 27/18 27/23 41/23 42/20 42/23 48/7 59/10 72/22	really [1] 70/23
pitiless [1] 53/1	pre [1] 61/4	proceed [4] 2/8 10/2 62/22 76/16	putting [4] 6/18 30/11 48/15 53/13	reason [3] 14/19 24/14 73/23
place [6] 24/10 49/5 60/2 64/16 64/16 75/18	pre-occupation [1] 61/4	proceeds [1] 41/17	quarter [1] 57/24	reasonable [1] 20/9
places [1] 18/21	preamble [1] 8/9	process [13] 4/14 11/12 19/17 20/10 36/10 37/1 39/23 44/2 44/5 47/24 48/10 49/4 56/12	Queen's [1] 46/16	reasons [6] 5/22 62/13 72/8 74/8 74/19 75/6
plan [1] 6/3	precipitate [1] 59/15	proceedings [9] 3/5 3/13 20/4 20/5 31/19 35/25 40/10 59/14 64/22	question [8] 17/12 30/6 30/14 42/15 49/1 67/22 71/13 72/6	recall [9] 2/18 3/16 23/10 24/1 37/4 41/21 43/5 43/19 53/17
planning [1] 25/3	precise [1] 38/16	proceeding [1] 21/4	questioning [2] 66/21 71/24	recalled [2] 42/22 43/14
playing [1] 33/14	precisely [3] 12/8 18/10 61/20	proceeds [2] 24/7 24/10	questions [9] 11/15 11/18 42/25 44/3 61/12 64/9 66/17	recalling [2] 44/24 61/18
please [5] 19/18 37/16 73/4 74/25 75/12	prefer [2] 35/22 50/2	proceed [4] 2/8 10/2 62/22 76/16	quarter [1] 57/24	recap [1] 74/11
pm [7] 5/12 6/1 6/4 10/12 11/25 22/7 76/22	preferable [1] 72/9	proceed [4] 2/8 10/2 62/22 76/16	Queen's [1] 46/16	received [7] 10/11 11/25 12/22 23/18 24/21 39/9 54/25
pocket [1] 33/9	preliminary [3] 10/21 12/21 12/24	proceed [4] 2/8 10/2 62/22 76/16	question [8] 17/12 30/6 30/14 42/15 49/1 67/22 71/13 72/6	recent [10] 36/23 44/11 63/15 63/18 68/3 68/8 68/10 69/18 71/4 71/11
point [16] 2/25 20/10 21/21 23/16 23/17 23/24 25/1 29/3 30/15 31/24 43/2 44/15 54/24 61/10 61/24 65/21	premature [1] 59/15	proceed [4] 2/8 10/2 62/22 76/16	questioning [2] 66/21 71/24	recently [3] 23/18 53/19 57/21
	preparation [2] 39/24 65/18	proceed [4] 2/8 10/2 62/22 76/16	questions [9] 11/15 11/18 42/25 44/3 61/12 64/9 66/17	reciprocated [2] 56/1 56/7
	prepared [1] 67/1	proceed [4] 2/8 10/2 62/22 76/16		reckless [1] 54/11
	preposterous [1]	proceed [4] 2/8 10/2 62/22 76/16		

R	6/5 7/8 8/11 9/23 10/6 10/7 11/9 16/11 16/14 18/6 19/20 21/15 22/10 23/14 23/23 36/7 38/6 38/11 41/5 41/22 42/6 42/25 43/24 44/18 47/4 51/8 51/10 62/10 64/8 67/18 72/24	requested [1] 47/19 requests [9] 9/9 9/15 15/5 15/16 50/7 50/10 50/15 66/10 66/14 require [4] 14/20 17/9 17/24 18/5 requirements [2] 1/13 66/15 requires [3] 19/8 43/22 66/4 requiring [2] 6/14 48/3 rescheduled [1] 74/14 reset [2] 57/19 60/22 resisting [1] 53/24 resolve [2] 26/24 30/4 resolved [2] 27/21 72/18 resources [5] 30/16 54/4 60/2 66/22 70/1 respect [20] 9/20 11/6 12/12 12/17 13/18 13/22 13/24 14/6 14/10 18/13 22/22 23/3 27/14 29/2 29/23 50/12 50/22 55/25 56/6 60/9 respectful [1] 26/16 respectfully [5] 23/9 23/25 58/10 59/19 61/7 respond [3] 9/9 17/4 46/25 respondent [1] 46/23 respondents [1] 47/2 responding [1] 66/14 response [6] 1/13 15/24 32/6 40/22 45/15 66/10 responsibilities [1] 66/2 responsibility [2] 64/23 71/3 responsible [5] 10/9 41/11 59/1 59/2 68/14 responsive [4] 9/18 15/2 15/6 15/15 result [6] 8/14 9/6 23/13 26/9 43/1 60/5 results [2] 12/22 12/24 retirement [1] 34/22 retraumatised [1] 32/15 retraumatising [1] 48/14 returned [2] 7/11 8/1 returns [1] 25/15 reveal [1] 60/6 revealed [3] 15/1 20/19 69/19 revealing [1] 1/24	reveals [1] 15/14 revelation [2] 16/24 26/18 revelations [1] 71/11 reversed [1] 54/18 review [9] 7/15 8/4 10/22 13/3 14/4 14/20 39/11 73/24 74/16 reviewed [2] 7/21 30/10 reviewing [3] 51/8 66/15 66/16 right [23] 1/11 6/18 20/18 24/14 24/16 25/11 26/24 27/3 28/2 28/15 30/20 30/24 31/10 42/5 49/10 51/13 53/13 59/13 63/6 67/10 70/16 75/4 76/12 rights [1] 52/18 rigour [1] 54/3 ring [1] 68/17 rings [1] 58/4 rip [1] 71/17 risk [1] 23/7 RMG [1] 61/13 RMG00000009 [1] 61/21 Rob [2] 2/9 7/16 Robodebt [1] 57/22 room [3] 2/4 3/12 75/11 route [3] 28/8 28/9 28/14 Royal [2] 57/21 58/1 ruined [1] 36/19 Rule [16] 9/10 9/15 15/2 15/5 15/7 15/8 15/10 15/11 15/13 15/15 50/7 50/10 57/6 60/10 66/10 66/17 Rule 10 [2] 50/7 50/10 Rule 9 [11] 9/10 9/15 15/2 15/5 15/7 15/8 15/10 15/11 15/13 15/15 66/10 Rule 9s [2] 57/6 60/10 rules [5] 9/10 18/21 18/25 21/10 56/24 ruling [1] 19/1 run [3] 7/11 40/7 40/19 runners [1] 28/1	21/24 22/4 22/5 24/4 25/16 25/17 39/4 48/2 49/20 51/16 55/16 67/9 67/9 68/8 69/21 70/17 75/6 salaries [1] 40/18 same [9] 5/6 16/12 18/10 32/15 32/22 33/1 33/4 33/5 37/23 sanction [1] 21/9 sanctions [5] 20/14 20/23 45/8 48/6 62/18 sane [1] 54/15 satisfied [1] 44/7 satisfy [1] 62/22 save [2] 16/25 75/1 say [29] 13/13 16/12 16/20 17/1 17/17 20/20 22/12 22/16 24/5 24/14 25/23 26/2 26/3 28/16 29/6 30/11 30/12 30/22 34/4 42/7 42/8 44/23 52/21 57/1 57/3 60/15 73/10 75/24 75/25 saying [4] 11/3 19/18 24/19 62/9 says [4] 32/17 55/2 55/24 68/12 scale [1] 6/25 scandal [7] 39/2 40/23 44/11 57/22 57/23 61/2 69/12 scandals [1] 44/12 scant [1] 36/17 scars [1] 52/23 scenes [2] 28/25 69/20 schedule [1] 19/3 scheduled [8] 6/13 7/4 49/4 50/4 51/2 64/5 74/13 74/18 scheduling [1] 29/13 Schwarz [1] 56/10 scope [2] 6/21 23/7 Scott [2] 2/9 7/16 search [9] 4/15 6/17 7/10 7/25 8/15 9/7 12/22 12/24 14/21 searches [1] 60/14 second [13] 1/25 2/21 15/8 21/12 22/6 41/24 43/8 45/1 48/1 48/23 56/18 60/25 61/1 secondly [3] 4/15 43/17 60/23 secrets [1] 53/4 section [21] 9/10 17/8 17/20 18/4 18/9 18/13 19/22 22/6 38/9 39/19 45/21 45/22 45/25 46/15 46/18 47/1 47/4 47/14 47/17
----------	--	--	--	--

S			
section... [2] 59/20 60/8	shall [3] 25/4 41/1 52/12	slightly [1] 68/11	state [4] 17/2 29/17 40/25 50/23
section 21 [7] 17/8 17/20 18/13 19/22 47/17 59/20 60/8	shambolic [1] 40/17	small [7] 4/4 9/25 16/25 17/6 23/8 65/25 66/7	stated [2] 10/18 39/20
Section 36 [6] 45/21 45/22 46/15 46/18 47/4 47/14	shame [2] 52/16 52/16	smaller [1] 22/12	statement [1] 65/19
Sections [1] 59/20	share [1] 50/21	Smith [5] 14/1 43/24 44/18 44/25 48/4	statements [1] 66/16
Security [3] 24/24 31/22 65/14	she [5] 23/23 25/17 26/3 40/16 55/24	snappy [1] 33/20	states [2] 41/20 70/8
see [7] 1/4 22/8 32/19 35/13 36/20 37/16 48/22	shocked [1] 60/25	so [48] 1/14 1/22 3/16 11/2 15/14 15/17 19/9 20/8 21/20 24/24 26/2 28/1 28/17 29/16 30/8 31/3 34/23 34/23 35/4 40/17 43/7 44/2 44/10 44/17 47/3 49/13 50/25 52/19 52/21 54/17 55/20 56/13 56/25 59/1 59/24 60/7 60/12 61/6 61/22 62/13 63/4 65/7 65/23 67/7 70/23 74/11 74/11 76/4	stating [1] 37/13
seek [5] 4/6 15/22 26/12 26/25 29/25	short [2] 19/9 51/25	solitor [1] 48/22	statutory [6] 19/12 20/13 21/1 21/2 47/6 54/3
seeking [1] 28/12	shortfalls [1] 41/11	solicitors [2] 38/1 39/17	STEIN [6] 31/9 49/20 59/23 74/4 74/22 77/4
seemed [3] 27/24 54/14 57/16	shortly [1] 8/24	some [17] 9/21 15/19 21/4 21/22 30/15 32/3 43/17 48/13 50/17 53/1 53/14 53/15 55/8 56/19 70/14 74/17 76/11	stemming [1] 18/25
seems [4] 32/4 34/1 61/16 70/23	should [36] 1/21 1/25 2/24 3/9 10/4 14/14 14/18 16/13 17/17 18/4 18/22 23/17 24/20 25/14 27/2 27/9 28/18 29/8 29/23 34/8 40/5 42/10 42/21 43/10 45/16 47/16 50/6 51/1 52/10 56/18 58/20 58/23 59/20 61/8 75/2 76/15	somebody [1] 24/24	steps [3] 7/6 13/21 14/3
seen [2] 24/17 31/22	shouldn't [1] 51/11	something [4] 4/9 16/18 23/2 54/22	still [3] 7/13 20/3 62/25
self [3] 25/9 61/25 62/1	show [1] 56/22	sometimes [3] 18/14 39/11 52/7	stone [1] 62/4
self-incrimination [3] 25/9 61/25 62/1	showed [1] 55/24	somewhat [2] 22/17 38/18	stop [2] 33/7 48/7
send [1] 16/8	shown [4] 35/9 36/13 36/15 56/5	soon [3] 14/11 29/1 33/9	story [1] 72/4
sense [1] 29/9	shows [1] 58/18	sorry [2] 18/1 18/3	straight [1] 55/9
sensible [1] 76/2	Sight [1] 61/1	sort [1] 56/19	strategy [1] 39/7
sent [7] 1/20 5/11 6/2 18/17 19/24 26/11 57/7	Sight's [1] 61/1	sought [2] 37/13 37/20	strength [1] 46/13
separate [4] 30/13 33/23 34/4 43/3	significant [6] 6/9 7/21 22/1 22/21 39/10 42/16	sound [1] 50/1	stress [1] 22/25
separately [1] 61/9	significant/substanti al [1] 42/16	sounds [1] 68/18	stricture [1] 54/17
September [4] 52/12 59/16 60/17 62/23	significantly [1] 3/2	spanner [1] 32/21	striving [1] 54/18
series [6] 1/8 3/20 4/8 23/18 53/25 71/2	silence [1] 16/17	speak [6] 26/1 28/1 28/17 33/8 49/11 73/8	strong [2] 42/7 72/5
serious [6] 27/5 36/21 40/6 48/9 61/15 63/17	similar [1] 46/7	specific [2] 9/15 38/1	strongest [1] 36/5
seriously [2] 10/8 60/11	simply [8] 16/23 20/10 26/16 30/12 38/11 63/1 65/22 72/14	specified [1] 41/3	structural [1] 61/15
seriousness [2] 45/16 46/24	simultaneous [1] 16/15	specify [1] 13/8	subheading [1] 23/16
serve [2] 19/18 60/8	since [4] 2/4 63/19 63/20 76/6	speculate [1] 21/18	subject [5] 2/25 30/2 44/22 48/1 58/20
served [2] 17/21 47/2	single [1] 44/13	spent [1] 65/17	subjecting [1] 53/14
service [1] 18/4	sink [1] 34/21	spoken [2] 16/21 74/23	submission [4] 26/25 28/10 43/7 65/6
session [1] 66/25	sir [101]	staffed [1] 31/13	submissions [29] 2/2 15/22 17/5 23/10 25/13 25/16 25/18 25/19 26/4 26/12 31/9 39/18 48/21 49/7 49/17 52/6 52/13 63/2 63/4 63/8 63/10 67/2 73/7 73/14 77/3 77/4 77/5 77/6 77/7
set [12] 9/14 10/14 12/14 12/23 18/11 24/9 26/10 40/4 65/10 65/18 65/19 75/21	Sir Wyn [1] 34/25	stage [1] 23/4	submit [7] 44/25 45/15 47/7 58/11 59/19 61/7 63/22
sets [3] 6/7 15/4 19/5	sit [2] 73/24 74/17	stages [1] 20/8	submitted [1] 66/20
setting [1] 5/12	sits [1] 23/21	standard [1] 12/11	submitting [1] 66/17
settle [2] 34/16 34/19	sitting [1] 25/2	start [6] 13/4 26/6 31/20 51/22 67/6 71/17	subpostmaster [2] 25/24 53/20
settled [1] 34/14	situation [11] 17/16 18/8 20/14 20/18 24/21 35/3 42/20 56/14 63/25 64/13 71/7	starting [1] 2/24	subpostmasters [5] 31/2 32/10 39/4 42/24 64/20
seven [2] 24/24 41/18	size [1] 12/16		subsequent [1] 58/8
Shaikh's [2] 58/17 60/6	Skinner [2] 56/9 56/25		substantial [1] 42/16
	slack [1] 55/21		successful [1] 53/20 46/19
	sleep [1] 33/19		successfully [1] 46/19
			such [15] 4/13 10/24 17/14 17/21 17/25 20/25 22/23 37/15
			40/18 54/12 54/13 68/16 69/25 72/3 72/11
			suffered [1] 52/23
			suffering [2] 35/7 54/21
			sufficient [1] 13/4
			suffocated [1] 53/13
			suggest [7] 27/14 30/13 38/18 38/21 40/3 43/9 44/6
			suggested [2] 26/15 41/16
			suggesting [1] 42/21
			suggestion [6] 38/10 38/13 46/5 57/12 57/15 59/22
			suggestions [1] 28/12
			suggests [2] 23/21 42/5
			summarising [1] 19/6
			summary [2] 12/2 14/25
			summer [4] 2/24 5/22 42/1 74/15
			support [3] 5/2 43/8 49/3
			supported [1] 74/22
			supports [1] 72/22
			suppressed [1] 57/11
			Sure [1] 76/12
			surely [1] 60/11
			surprise [1] 64/1
			Susanne [1] 13/25
			suspended [1] 33/13
			symptomatic [1] 4/7
			system [3] 4/10 55/19 67/10
			systemic [1] 4/20
			T
			table [1] 15/4
			tactics [2] 32/22 33/11
			take [12] 10/4 16/12 22/25 23/2 24/20 30/15 33/9 36/4 49/5 51/1 51/16 75/20
			taken [14] 2/17 5/20 5/20 7/6 13/21 14/4 18/24 19/7 22/3 27/12 42/3 58/12 64/19 69/23
			takes [3] 34/10 48/1 55/8
			taking [7] 4/1 23/7 32/19 32/23 41/9 45/8 75/18
			tale [1] 1/21
			Talk [1] 33/7
			talking [2] 21/22

T	53/15 55/21 75/21 75/22	33/15 33/16 33/16 they've [2] 33/18 55/16	timetable [2] 8/25 43/11	67/13
talking... [1] 58/19	themselves [4] 11/10 26/9 45/6 49/22	thing [2] 20/25 22/6	title [1] 38/16	twice [1] 52/16
tandem [2] 46/13 47/12	then [17] 6/17 14/23 19/24 20/4 25/24	things [4] 24/4 29/5 34/8 70/3	today [14] 6/15 10/23 11/7 28/24 29/3 35/9 39/14 66/2 69/10 69/14 69/22 69/25 70/11 72/23	two [23] 1/18 2/7 4/6 8/20 16/3 20/8 25/3 26/12 27/1 27/11 27/24 32/7 34/3 40/22 42/4 43/3 43/8 48/1 53/2 53/15 54/24 54/25 75/20
tangential [1] 10/1	33/10 35/14 41/25 46/1 49/14 49/15 53/23 56/9 59/17 72/6 75/12 76/12	think [11] 18/18 30/20 33/2 34/18 48/21 57/8 62/6 62/25 68/10 74/24 75/24	today's [3] 70/22 75/18 75/22	type [2] 38/21 69/7
team [10] 9/22 12/19 18/7 23/20 29/7 40/2 44/1 62/15 65/15 65/23	there [44] 1/8 16/13 16/21 20/3 20/4 20/25 20/25 21/13 21/18 24/18 24/22 27/11 28/2 28/13 28/15 34/16 34/22 35/19 38/25 42/4 42/7 42/19 43/2 44/10 51/9 55/12 56/18 58/23 58/25 60/1 60/15 61/22 61/23 62/18 67/17 67/17 70/4 71/16 71/21 71/22 72/4 73/20 76/7 76/16	thinking [3] 28/17 29/5 54/2	together [3] 2/4 53/6 74/20	typify [1] 55/1
technology [6] 58/14 58/21 58/25 59/5 59/5 61/5	there's [6] 15/4 20/5 20/8 22/14 24/13 24/16	third [8] 15/10 23/16 23/24 28/2 28/8 28/9 28/13 42/7	told [3] 52/21 53/10 68/22	U
tell [4] 36/12 36/15 57/5 74/25	therefore [10] 5/3 29/7 35/22 41/12 43/15 44/22 54/6 60/8 70/10 72/12	thirdly [1] 4/16	toll [1] 32/19	UK [1] 67/11
telling [2] 38/25 75/21	these [27] 1/17 4/20 6/12 12/19 12/24 14/6 14/11 17/18 23/21 31/17 31/19 33/11 34/15 36/23 38/5 40/24 41/21 43/18 44/19 57/18 59/2 62/2 63/14 65/13 67/14 70/14 72/7	thirds [1] 42/4	tomorrow [6] 6/15 10/20 10/23 11/6 12/15 55/4	UKGI [2] 25/16 41/6
tempting [1] 18/1	they [63] 1/22 2/16 3/23 11/10 11/13 13/10 13/13 16/9 16/12 24/17 25/6 25/13 25/16 25/19 26/1 27/25 28/1 30/22 31/20 32/2 32/14 32/24 33/2 33/12 33/16 34/7 34/16 34/17 34/18 35/13 35/14 35/15 36/16 36/18 38/6 38/18 39/7 40/18 40/19 44/2 49/25 52/21 52/22 53/1 53/7 53/10 54/2 55/16 55/21 56/23 57/8 57/9 57/25 59/24 59/25 59/25 60/19 62/21 63/5 64/11 65/15 70/21 74/14	this [145]	too [4] 20/6 66/19 68/18 74/1	ultimately [5] 7/18 22/16 59/3 71/18 76/2
tension [1] 16/2	they'd [1] 52/23	Thomas [1] 2/10	took [3] 1/18 64/15 64/16	umbra [1] 57/17
terms [18] 1/15 3/10 4/15 5/4 6/17 7/10 7/25 8/15 9/7 20/23 23/6 25/20 40/25 41/4 41/12 45/4 45/14 68/7	they'll [2] 33/3 33/9	thorough [1] 39/24	tooth [1] 53/23	unable [3] 17/22 31/18 55/4
terrible [2] 57/22 57/23	they're [8] 8/10 32/22 32/25 33/2 33/14	those [36] 2/18 2/22 3/4 3/11 3/13 3/14 4/4 10/9 13/3 26/22 26/24 27/10 27/14 27/18 28/9 34/2 35/12 39/14 40/16 41/25 49/7 49/25 50/15 51/11 55/1 58/16 58/19 61/20 62/13 64/8 64/10 66/17 72/8 74/7 74/13 74/19	tormented [1] 52/24	unambiguous [1] 26/6
than [14] 8/20 8/23 9/13 14/12 19/3 22/13 22/18 30/5 33/8 34/5 36/24 53/8 60/13 76/1		thought [4] 28/3 54/4 54/6 55/3	total [1] 32/24	unanimous [1] 52/9
thank [22] 1/6 1/7 21/11 27/22 30/23 30/24 49/9 49/18 51/21 51/23 52/4 63/9 65/22 73/5 73/12 75/4 75/7 75/23 76/3 76/18 76/19 76/21		thousands [3] 7/12 8/1 66/9	totally [1] 65/9	uncertainty [1] 76/7
thanksgiving [1] 63/1		threatens [1] 69/6	touch [1] 52/14	unclear [1] 6/22
that [412]		three [1] 4/12	towards [3] 52/13 56/20 57/10	uncover [1] 54/19
that I [2] 10/4 29/8		through [8] 4/24 22/3 28/14 31/22 40/8 40/9 48/15 53/10	Tower [1] 46/21	uncovered [2] 14/24 68/20
that's [15] 4/20 12/20 21/8 21/9 22/12 28/19 30/18 49/15 51/15 51/20 63/6 67/3 73/6 76/10 76/19		throughout [1] 36/10	track [1] 68/11	uncovering [1] 61/2
their [28] 11/15 17/10 17/11 21/8 32/5 32/8 33/17 34/7 34/10 34/24 35/8 36/14 42/25 43/4 43/21 49/23 50/7 52/23 53/7 53/8 53/13 54/20 56/19 56/20 56/23 57/12 59/4 75/20		thought [4] 28/3 54/4 54/6 55/3	transparency [1] 59/1	under [16] 3/24 9/9 10/15 15/20 17/8 17/11 18/24 19/22 21/9 23/16 24/21 30/17 42/14 47/13 73/24 74/16
them [36] 2/20 2/23 4/25 5/24 7/23 8/9 8/12 11/12 11/12 11/14 11/16 11/17 12/19 25/5 27/25 32/5 32/13 33/6 33/7 33/8 36/11 39/11 41/23 43/5 48/14 48/15 48/15 53/1 53/12 53/14 53/14 53/15		thousands [3] 7/12 8/1 66/9	transparent [1] 5/1	underestimated [1] 55/7

<p>U</p> <p>unless... [2] 76/13 76/14</p> <p>unlikely [1] 54/11</p> <p>unnatural [1] 19/14</p> <p>unreasonable [1] 62/19</p> <p>unreservedly [1] 6/12</p> <p>unthinking [4] 47/21 53/3 58/21 60/13</p> <p>until [13] 5/21 11/5 11/24 12/15 13/16 28/23 39/7 50/4 51/11 52/12 60/17 74/14 76/23</p> <p>untouchable [1] 33/2</p> <p>untruths [1] 36/15</p> <p>unwanted [1] 1/17</p> <p>unwelcome [1] 1/9</p> <p>up [11] 8/19 16/23 22/10 22/19 26/17 34/9 39/9 48/6 57/10 68/7 71/17</p> <p>upcoming [2] 18/6 22/1</p> <p>update [5] 6/3 14/22 28/16 29/3 29/10</p> <p>updates [1] 29/1</p> <p>updating [1] 28/22</p> <p>upon [7] 22/18 24/12 29/6 36/2 37/2 41/1 62/20</p> <p>ups [1] 53/4</p> <p>urge [1] 36/4</p> <p>us [21] 1/15 2/4 4/11 19/23 20/16 25/18 26/25 32/24 32/25 33/13 33/15 33/18 33/24 34/24 35/12 35/13 39/24 44/19 45/10 55/15 62/3</p> <p>use [5] 4/15 17/18 38/16 41/9 76/4</p> <p>used [2] 46/19 59/20</p> <p>useful [1] 49/3</p> <p>uses [1] 43/17</p> <p>using [1] 56/4</p> <p>usual [1] 59/9</p>	<p>70/13 73/5 73/13 75/7 75/23 76/3 76/19 76/20</p> <p>vexatious [1] 52/7</p> <p>viability [1] 67/11</p> <p>vicious [1] 53/12</p> <p>victims [1] 55/7</p> <p>view [9] 12/4 23/1 26/16 27/3 27/12 40/21 50/21 51/1 51/6</p> <p>viewed [2] 38/13 40/5</p> <p>views [1] 55/3</p> <p>visited [2] 18/4 21/6</p> <p>voices [2] 27/8 27/14</p> <p>voluntarily [1] 66/10</p> <p>W</p> <p>wait [1] 72/5</p> <p>waiting [2] 29/9 75/10</p> <p>wall [1] 55/10</p> <p>Wallis's [1] 39/1</p> <p>want [2] 5/2 51/17</p> <p>wants [1] 65/1</p> <p>warning [1] 25/9</p> <p>was [76] 1/23 2/17 2/19 4/2 4/7 4/9 4/9 4/22 4/23 5/17 5/20 6/1 6/21 6/23 8/2 8/12 10/14 10/15 11/3 12/10 12/18 13/10 15/7 15/8 15/9 15/10 15/11 15/11 15/12 15/16 20/3 21/3 22/13 23/10 23/13 24/5 24/8 24/12 24/12 24/13 28/7 34/25 35/9 37/12 37/20 38/2 38/11 39/12 39/13 39/15 40/15 41/22 46/18 46/19 53/5 53/20 53/23 54/11 54/23 57/2 57/3 57/12 58/1 60/24 61/3 61/12 61/14 61/18 61/19 62/7 63/1 67/10 67/14 68/10 68/22 75/18</p> <p>watched [1] 66/25</p> <p>watching [1] 3/13</p> <p>watershed [1] 59/9</p> <p>Watt [5] 63/6 63/7 63/8 73/5 77/7</p> <p>way [24] 3/16 4/8 19/15 20/25 27/6 28/11 30/11 30/17 31/14 31/15 34/12 34/16 35/13 38/23 42/18 46/2 46/7 47/21 47/22 48/16 55/15 59/21 65/21 76/13</p> <p>way-ticket [1] 55/15</p> <p>we [109]</p> <p>we'd [2] 28/9 51/16</p>	<p>we'll [3] 49/14 51/22 75/21</p> <p>we're [4] 20/14 20/15 23/4 50/13</p> <p>we've [3] 40/24 44/9 44/21</p> <p>website [1] 8/11</p> <p>Wednesday [1] 14/12</p> <p>week [43] 1/18 2/12 2/12 2/13 3/3 7/5 10/12 10/23 11/2 11/23 11/23 12/12 12/13 12/17 12/25 13/4 13/5 13/10 13/12 13/16 13/23 13/24 14/18 24/1 25/4 50/4 50/21 51/3 65/4 65/4 65/5 69/17 69/17 71/8 73/22 73/25 74/3 74/13 74/13 74/17 74/18 75/2 75/3</p> <p>week 2 [1] 12/12</p> <p>week 3 [3] 12/17 13/4 13/23</p> <p>week 4 [1] 13/10</p> <p>week's [1] 8/4</p> <p>weeks [8] 13/19 41/19 43/18 61/6 73/17 74/14 75/16 75/20</p> <p>well [20] 14/15 30/25 40/1 46/4 46/12 47/5 47/12 49/14 54/15 56/22 61/4 62/16 67/22 68/7 71/14 71/23 73/13 75/12 76/13 76/19</p> <p>went [1] 67/6</p> <p>were [25] 3/23 5/8 15/1 15/6 24/10 24/18 25/5 25/8 27/25 28/1 30/1 30/13 31/18 33/13 35/12 39/7 39/10 52/18 53/11 54/6 57/4 57/6 57/9 62/8 67/15</p> <p>Westminster [1] 71/8</p> <p>what [46] 1/23 2/3 2/13 3/10 4/3 4/21 10/14 14/23 19/11 19/24 20/17 21/5 21/13 21/20 26/3 29/17 32/2 32/9 33/14 33/16 34/18 43/6 44/4 44/23 46/9 48/2 55/14 56/25 58/10 64/15 65/6 67/9 67/23 68/2 68/22 69/17 69/21 70/7 72/25 73/1 73/16 74/20 75/6 75/24 76/1 76/7</p> <p>what's [1] 21/16</p> <p>whatever [2] 30/21 31/3</p>	<p>whatsoever [1] 40/13</p> <p>when [17] 1/17 11/9 11/10 12/8 23/10 26/13 29/6 31/20 33/13 41/9 55/7 55/9 57/13 61/11 61/15 67/9 72/17</p> <p>where [12] 9/24 20/14 21/24 22/24 23/4 23/6 33/8 38/3 39/2 50/10 58/7 64/18</p> <p>whereby [2] 31/18 42/20</p> <p>whether [15] 9/23 11/21 12/10 14/9 16/13 16/19 16/22 20/19 20/21 25/13 31/11 51/9 64/4 73/24 74/16</p> <p>which [69] 1/15 3/20 3/22 4/3 5/19 6/21 8/3 8/21 9/3 9/17 13/16 15/9 15/10 15/16 16/16 18/11 18/15 18/25 19/5 20/8 22/19 23/22 23/23 25/25 27/1 29/6 29/12 30/5 31/22 31/24 36/1 38/4 38/22 40/25 42/23 43/4 45/17 47/1 47/19 49/19 53/6 57/6 57/11 58/1 58/15 60/16 61/19 63/24 64/8 64/9 65/2 66/11 67/17 67/18 67/18 67/19 67/20 69/11 69/19 70/16 70/19 71/14 71/19 71/23 73/14 73/21 74/5 74/5 74/6</p> <p>while [5] 21/19 63/14 66/7 66/20 71/1</p> <p>whilst [2] 18/1 24/13</p> <p>who [30] 3/4 3/12 5/16 8/18 13/20 21/15 24/25 25/3 25/5 25/8 27/14 34/10 35/12 39/3 40/14 40/17 42/7 42/13 49/11 55/2 56/9 58/19 67/15 68/13 68/15 71/2 73/8 73/22 74/23 75/1</p> <p>whole [11] 24/16 35/3 36/10 55/18 55/22 56/2 56/8 59/19 61/7 64/15 75/25</p> <p>whom [1] 18/17</p> <p>whose [3] 27/8 36/18 65/8</p> <p>why [15] 12/8 28/4 33/6 34/23 40/16 40/19 52/12 55/20 56/14 56/16 60/14 64/16 65/7 67/14 68/13</p>	<p>wide [1] 70/18</p> <p>wide-ranging [1] 70/18</p> <p>wider [4] 4/5 4/8 4/13 44/3</p> <p>will [67] 2/16 7/14 7/18 7/19 8/24 10/2 10/4 10/8 10/18 13/1 13/1 14/3 14/8 14/22 16/12 16/20 17/3 17/7 21/17 22/8 22/20 27/19 28/22 28/25 31/2 32/7 33/25 34/7 34/15 34/16 34/19 35/14 35/23 37/4 37/15 40/14 41/20 42/16 43/18 47/14 52/21 53/17 54/24 57/18 59/12 60/21 61/10 62/5 63/4 64/11 65/17 66/11 68/25 71/8 71/19 71/24 73/17 73/24 74/8 74/12 74/14 74/16 74/19 75/5 75/15 76/4 76/7</p> <p>willingness [1] 70/12</p> <p>Wilson [2] 2/9 7/17</p> <p>wish [9] 16/18 25/13 25/22 26/1 28/16 30/22 31/3 73/10 74/2</p> <p>wishes [6] 6/11 25/23 26/3 63/4 65/22 73/8</p> <p>withhold [1] 39/7</p> <p>withholding [1] 56/16</p> <p>within [4] 31/19 44/11 44/15 52/18</p> <p>without [3] 17/13 38/12 62/23</p> <p>witness [9] 8/21 9/24 11/7 39/12 51/7 66/16 75/2 75/3 75/10</p> <p>witness's [1] 9/2</p> <p>witnesses [66] 2/11 2/18 2/23 3/3 3/4 5/4 5/8 7/4 8/14 8/18 8/23 10/22 11/2 11/16 11/23 12/13 12/17 12/20 13/5 13/10 13/12 13/16 13/19 13/23 13/25 14/18 16/14 18/6 21/15 22/2 25/3 25/5 25/8 41/18 41/21 41/25 42/2 42/12 42/13 42/20 43/3 44/21 45/6 50/3 50/15 50/18 51/2 62/2 64/6 64/8 64/10 65/3 65/13 65/15 66/18 67/15 67/25 71/24 72/1 72/3 72/7 72/10 73/22 74/12 74/18</p>
--	--	--	---	---

W
witnesses... [1]
75/16
won't [6] 28/23 49/20
52/20 57/1 73/25
75/14
wondered [1] 28/4
word [1] 18/13
words [4] 33/8 38/20
39/14 56/4
work [14] 5/3 6/24
10/15 12/18 14/13
40/1 46/4 46/12 47/12
66/8 69/3 69/4 69/24
70/21
worked [1] 67/12
working [3] 4/24 8/20
12/19
works [2] 32/21 46/7
world [1] 54/15
worms [1] 61/23
would [56] 2/17 8/3
8/7 10/21 10/25 11/5
11/10 11/10 11/11
11/13 11/16 11/17
11/20 12/23 18/8
19/13 19/16 19/21
19/25 19/25 20/19
20/22 21/5 21/12 23/9
23/15 23/24 24/25
25/1 25/8 29/6 30/1
30/14 36/1 36/4 45/2
46/1 46/4 46/12 47/10
47/20 47/21 47/22
49/3 49/12 50/2 51/18
54/2 54/16 54/22 55/3
57/2 59/14 62/4 62/19
72/14
wouldn't [1] 12/15
wounds [1] 53/9
write [2] 14/8 55/3
writes [1] 35/4
writing [4] 12/20 74/8
74/9 75/25
written [5] 26/21
27/25 57/1 74/19 75/6
wrong [5] 4/3 4/9
38/11 67/6 70/25
wrote [2] 27/25 61/18
Wyn [1] 34/25

Y
year [4] 3/21 47/10
63/19 65/20
years [5] 24/25 35/6
36/11 36/16 56/15
yes [15] 1/6 18/19
19/11 19/16 20/7
20/23 21/2 21/3 22/15
48/25 63/7 73/9 76/9
76/12 76/18
yesterday [4] 11/25
12/21 22/7 26/11

yet [4] 12/7 56/1 56/6
67/21
yield [1] 21/17
you [141]
you'd [1] 28/7
you'll [3] 3/16 23/9
28/21
you're [4] 2/6 2/22
39/16 62/25
you've [2] 2/6 24/15
your [12] 8/9 10/13
16/11 18/7 23/25 28/6
29/7 51/5 52/18 62/15
63/2 75/16
yourself [1] 55/10

Z
zero [1] 34/13