

IN THE UK COVID-19 PUBLIC INQUIRY

BEFORE BARONESS HEATHER HALLETT

IN THE MATTER OF:

THE PUBLIC INQUIRY TO EXAMINE THE COVID-19 PANDEMIC IN THE UK

**Submissions on behalf of Covid 19 Bereaved Families for Justice and NI Covid 19
Bereaved Families for Justice
for the preliminary hearing on 4 October 2022**

1. Covid 19 Bereaved Families for Justice (CBFFJ) is a UK-wide group made up of thousands of those whose loved ones died because of the failures of a range of individuals and bodies to prepare for and respond effectively to the Covid 19 pandemic. CBFFJ was established in April 2020, well before the statutory Inquiry. Indeed, the current Inquiry was set up following extensive campaigning and repeated calls from CBFFJ, and others, for a wide-reaching statutory inquiry that would establish the truth about how and why so many people lost their lives, and whether thousands upon thousands of deaths could and should have been prevented. CBFFJ was set up as a private Facebook page, which currently has over 6,500 supporters, of whom 3,225 have signed up as members of the CBFFJ group. NI Covid 19 Bereaved Families for Justice (NI CBFFJ) is a branch of the wider UK CBFFJ group and has separate CP status and representation for Module 1. For convenience, references to CBFFJ can be read as including NI CBFFJ.
2. The goal of CBFFJ has always been, and remains, to establish what happened to their loved ones, to participate effectively in that pursuit of the truth, and, in so doing, to ensure accountability and to prevent future deaths. CBFFJ considers that the Chair's Inquiry can and should achieve those same aims. Below, CBFFJ set out their initial submissions as to how that vital aim – to conduct a fearless and effective inquiry that establishes the truth and involves the bereaved in a meaningful way – can be achieved.
3. As requested by the Inquiry on 26 September, we hereby confirm that the CBFFJ and NI CBFFJ representatives intend to make oral submissions at the preliminary hearing. These written submissions follow the order of the issues set out in §2 of CTI's note, dated 22 September 2022. Where CBFFJ have no written submissions to make on an issue at this stage, the issue has not been included below.

Dialogue and communication with the Inquiry Team

4. Collectively, the legal team representing CBFFJ has acted in many of the major inquests and public inquiries of recent years, including the Hillsborough Inquests, the Undercover Policing Inquiry, the Birmingham Pub Bombing Inquests, the Grenfell Tower Inquiry, the Anthony Grainger Inquiry, the Manchester Arena Inquiry, the Fishmongers' Hall Inquests, the Brook House Inquiry, the Dawn Sturgess Inquiry, the Historical Institutional Abuse Inquiry in Northern Ireland, the Renewable Heat Incentive Inquiry in Belfast and the

Stardust Disco Inquests in Dublin. A number of those processes have involved the same experienced firm acting as STI for the Chair in this Inquiry.

5. Our collective experience is that high-profile and complex inquiries of this nature require an open, collaborative and two-way approach to communication between the Inquiry Team and CPs. Such dialogue ensures that the Inquiry takes on board the observations of those most intimately involved in the Inquiry's work (thus enhancing and furthering its own process); allows the Inquiry to discuss and explain its approach, including where it differs from that sought by CPs; makes it possible to identify and try to resolve potential disagreements (and if necessary, address through submissions and rulings from the Chair); and demonstrates that the Inquiry is open (to suggestion and improvement) and transparent, which in turn ensures the confidence of CPs and the wider public in the Inquiry and its vital work. Where an approach of this kind is not adopted, and the Inquiry adopts a closed, uncommunicative approach, where it proceeds by handing down decisions without dialogue, the Inquiry suffers, and so in turn do CPs and the wider public.
6. We acknowledge that the Inquiry is at an early stage, and that it is trying to move at considerable pace. However, CBFFJ is concerned that the Inquiry has not adopted the open, collaborative and two-way communication that would serve it, and the Inquiry's CPs, best. CBFFJ has sought, over a period of many months since the establishment of the Inquiry to engage with the Inquiry Team on a range of key issues, including the Inquiry's process, a proposal on how the Inquiry should consider obtaining the evidence of the bereaved (including memorials to their loved ones, also known as pen portraits), and CBFFJ's concerns about the Inquiry's "listening exercise". Despite having engaged fully with the families during the consultation on the 'terms of reference' that approach has not been continued with respect to the scope of the first two modules (referred to below). The Inquiry's response has been limited and disappointing, despite a number of attempts by CBFFJ to raise these concerns prior to this first preliminary hearing.
7. To be clear, CBFFJ does not seek any privilege or special treatment from the Inquiry; it would expect the Inquiry to conduct a similar form of communication with other CPs. But currently there has been little effective communication, despite CBFFJ's best efforts. The four meetings between the legal teams have proceeded with no agenda items from the Inquiry and have been essentially one-way. Regrettably, that is not conducive to an effective Inquiry, nor is it conducive to the effective participation of the bereaved. CBFFJ would therefore invite the Inquiry to reflect on these submissions and take them into consideration in the constructive spirit in which they have been made.

Scope of Module 1

8. In our view, it would be helpful if the Inquiry team would engage with CPs regarding the scope of modules before a provisional scope is published. This would allow CPs to assist the Inquiry in a more collaborative way, rather than the Inquiry establishing a view which is then only subject to formal submissions.
9. As regards the Module 1 Scope document, CBFFJ have three specific concerns at this stage. First, CBFFJ is concerned that the Module 1 document makes only a single reference to the devolved nations. In contrast, the Module 2 Scope documents contain separate sub-modules for the devolved nations/jurisdictions, demonstrating a recognition of the significance of devolved issues, and the importance of the bereaved within the devolved nations. It is

unclear why devolved issues are not to be explored in Module 1 in a similar way. In our submission, they should be. For example, it is vital to ensure that the unique geographical location and political settlement of Northern Ireland is considered and addressed within the context of Module 1. In particular, Northern Ireland has the following unique administrative, legal and constitutional features that will affect preparedness there:

- a. The health service in Northern Ireland is not administered by the National Health Service (which does not operate in Northern Ireland) but through a complex structure of trusts, health boards (albeit very recently abolished) and the Department of Health.
 - b. The health and social care services are amalgamated unlike the rest of the UK.
 - c. Decision making by the Northern Ireland Executive is done on a cross community basis with significant, controversial or cross-cutting decisions (of which there were many taken during the pandemic) required to be taken by the Executive and not individual ministers.
 - d. Northern Ireland is part of an epidemiological unit of the island of Ireland with an international land border that allows freedom of movement.
10. Second, CBFFJ is concerned that the Module 1 Scope document makes no reference to preparedness with respect to the issues of discrimination and the disproportionate impact of Covid on black and brown communities, other minority ethnic communities, and sections of the community who are otherwise more vulnerable due to particular characteristics. That issue was rightly given greater prominence in the Inquiry's ToR following the consultation and the Chair's response to the PM, yet it does not feature in the Module 1 Scope document. CBFFJ is concerned that this omission indicates that the issue will not be given the central focus during Module 1 that is required.
11. Third, the Module 1 Scope document does not refer to planning within the social care and care home sector, or places of detention. That is a concerning omission given the importance of that issue and the direct causal link between a lack of preparedness in the care home sector and thousands of preventable deaths. CBFFJ request confirmation that these issues will form part of the Inquiry's work within Module 1, and that the scope of Module 1 will be expanded accordingly.
12. Finally on Module 1, we recognise that work is at an early stage, however, we request that the Inquiry indicates that it intends to engage with CPs regarding the selection of appropriate witnesses as early as possible.

Rule 9 requests

13. CBFFJ note the steps that have been taken by the Inquiry to date and the further steps that are proposed (§§40-48 of the CTI note). CBFFJ respectfully agrees that these efforts represent a reasonable start in seeking to obtain the relevant material that is central to the Inquiry's work, subject to the following comments.
14. Plainly, ensuring that all relevant material is obtained is fundamental to discharging the Inquiry's ToR and meeting the acute public interest engaged by this Inquiry. In this regard, CBFFJ address three topics below that fall under the Rule 9 issue: first, the Inquiry's approach to obtaining relevant material; second, the disclosure of Rule 9 requests to CPs; and third, the use of position statements by the Inquiry.

Production of material to the Inquiry

15. CBFFJ invite the Inquiry to adopt the following approach: all potentially relevant material should be obtained by the Inquiry (adopting a broad approach to what is deemed of potential relevance), and in identifying and providing material to the Inquiry, material providers should be reminded that they have a duty of candour. There are compelling reasons for that approach.
16. First, it will ensure that the Inquiry's ToR are discharged. By obtaining all potentially relevant material, no relevant material will fail to be disclosed, and the Inquiry Team can then ensure, assisted by CPs, that all relevant material is considered in order to meet the Inquiry's ToR.
17. Second, such an approach will generate CP and wider public confidence. By obtaining all potentially relevant material, the Inquiry will demonstrate that the Inquiry is casting the initial net sufficiently broadly and then conducting its own independent assessment of relevance when determining what material needs to be considered in evidence (including in oral evidence) in order to discharge the Inquiry's ToR. That is vital given the context of this Inquiry. Were the Inquiry instead to permit material providers to determine relevance prior to disclosure that would give rise to significant suspicion and concern among the bereaved, other CPs and the wider public.
18. The Inquiry should closely scrutinise any attempt by material providers, including central government, to withhold material from the Inquiry. It is highly questionable whether such an approach would be lawful (save in specific, exceptional circumstances that do not appear to apply). Irrespective, efforts by material providers to withhold material from the Inquiry should be rejected, other than in those exceptional circumstances: they will undermine the independence of the Inquiry, call into question its efficacy, and hinder the very confidence – among the bereaved, other CPs, and the wider public – that the Inquiry must build.

Disclosure of Rule 9 requests to CPs

19. CBFFJ invite the Inquiry to confirm that Rule 9 requests that have already been issued will be disclosed to CPs and that future draft Rule 9 requests will be provided to CPs prior to issue. Such provision to CPs will (a) ensure transparency in the Inquiry's process, (b) allow CPs to assist the Inquiry by identifying, based on their own unique perspectives, further information and documents that should be sought, (c) aid the speed and progress of the Inquiry, by identifying relevant material more quickly than would otherwise be the case, and (d) build confidence in the Inquiry from both CPs and the wider public.
20. Such disclosure of Rule 9 requests to CPs would be consistent with the open, collaborative approach between the Inquiry and CPs that has been identified above, it will help the Inquiry in its vital work, and it will ensure the effective participation of CPs, including, crucially, the bereaved. Disclosure would of course be subject to the Inquiry's confidentiality undertaking.

The use of position statements by the Inquiry

21. In addition to the Inquiry's Rule 9 requests, CBFFJ invite the Inquiry to issue, to State and

organisational CPs and material providers, requests for the provision of position statements. Such requests can be made via Rule 9, although there is no necessity to do so.

22. In summary, relevant CPs and material providers should be asked to provide statements identifying, with respect to each relevant ToR and scope issue: (a) the organisation's narrative of events, including applicable responsibilities, the relevant legal/regulatory framework, what did and did not happen within its knowledge, and to identify both good practice and failures, (b) the potentially relevant material it holds with respect to those matters, and (c) the relevant aspect of the ToR and module scope issue to which such material relates.
23. Used in this way, position statements generate corporate statements from the relevant organisations directly involved in the Inquiry's work. They should be signed off by the Chief Executive or a person with such authority within the organisation. This ensures a comprehensive account, provided openly and at an early stage, and avoids the issue that can otherwise arise, in which organisations remain silent on matters until they are asked, creating delay and an appearance of evasion which assists neither the Inquiry, CPs nor the wider public.
24. The utility of position statements reflects repeated concerns over the lack of candour of State and other organisational participants in previous inquiries¹, and the endorsement of their use by senior members of the judiciary, including Sir Robert Owen (Chair of the Litvinenko Inquiry), Sir John Goldring (who acted as Assistant Coroner presiding over the Hillsborough Inquests), and Sir Peter Thornton QC (former Chief Coroner of England and Wales).² Position statements have been used effectively in a number of recent inquest and inquiry processes³ to enhance the collaborative, transparent and public nature of inquiries, to strengthen the pursuit of the truth at the heart of such inquiries, and to increase the efficiency and reduce the length of inquiry hearings. All of these factors support the use of position statements here.
25. In our submission, this is quintessentially the Inquiry in which position statements should be adopted, given the number of CPs and material providers involved, the volume of potentially relevant material, the breadth of the Inquiry's ToR, and the need to progress the Inquiry as speedily as possible. In some areas, the issues and material may be obvious. But at the outset, the provider will be in the best position to identify the facts within its knowledge and the material it holds, rather than leaving the Inquiry to search for unknown facts. To paraphrase the language of Singh LJ in *R (Hoareau) v Secretary of State for*

¹ For example, see the Francis Report into failures by the North Staffs NHS Trust (2013), the Equality and Human Rights Commission inquiry report into Deaths in Adult Mental Health Detention (2015), the Harris Review into self-inflicted deaths of young persons in custody (2015), the Kirkup Report into failures in Morecambe Bay NHS Trust maternity facilities (2015), Dame Eilish Angiolini's Report into Deaths in Police Custody (2017), Bishop James' report into the experiences of the Hillsborough families, 'The Patronising Disposition of Unaccountable Power' (2017); and the Grainger Inquiry Report (2019).

² JUSTICE Working Party report, 'When Things Go Wrong: the response of the justice system' (2020), chaired by Sir Robert Owen: "*Institutional defensiveness can impede the effectiveness of an inquiry or inquest, with a detrimental impact on participation and public confidence. We consider that a statutory duty of candour, which includes a rebuttable requirement for position statements, would help to foster a "cards on the table" approach. Directing the inquiry to the most important matters early on in the process could result in earlier findings and reduced costs.*" (p.2). See also §§4.45-4.46, pp.71-72.

³ For example, see the ruling on position statements of the Chairman of the Manchester Arena Inquiry, Sir John Saunders, dated 30 January 2020:

<https://files.manchesterarenainquiry.org.uk/live/uploads/2020/04/07204232/Ruling-on-Position-Statements.pdf>

Foreign and Commonwealth Affairs [2018] EWHC 1508 (Admin), §20, in this Inquiry the duty on organisational CPs and material providers is to draw the Inquiry's attention to relevant matters and to identify "the good, the bad and the ugly", rather than leaving the Inquiry to find the "needle in the haystack". Position statements provide a means by which the relevant needles can be most speedily and effectively be identified.

26. As with Rule 9 requests, draft requests for position statements should be disclosed to CPs, to allow effective input, and the position statements that are provided to the Inquiry should be disclosed to CPs. This will ensure transparency, build CP and wider public confidence, and allow CPs to assist the Inquiry by reviewing the position statements and proposing further questions and requests.

Disclosure to Core Participants

27. CTI's note states that "*The principal aim of disclosure to core participants will naturally be to provide a focused and proportionate amount of material to enable them to participate effectively in the hearing.*" (§49). This reference to "*focused and proportionate*" disclosure provides no test for what will be disclosed to CPs, it will result in inconsistent decision-making by the Inquiry, and it will undermine, rather than facilitating, the effective participation of the bereaved and other CPs.
28. In line with the position in other inquiries, all potentially relevant material should be disclosed to CPs, and disclosure should commence as soon as possible and proceed on a rolling basis. Doing so is essential to building and maintaining the confidence of CPs and the wider public, and will further the aims of the Inquiry. That is for the following reasons:
 29. First, if potentially relevant material is withheld from CPs, their ability to participate in the Inquiry will be significantly undermined, and the Inquiry, in turn, will not benefit from CPs' input, insight and perspective on material of potential relevance to the Inquiry's ToR. That will harm both the participation of CPs and the effectiveness of the Inquiry.
 30. Second, if potentially relevant material is withheld from CPs, a damaging perception will arise that the Inquiry lacks transparency, and material of relevance is being kept from CPs and the wider public. That must be avoided.
 31. Third, a test of "potential relevance" has been used in other statutory inquiries in recent years. Adopting a more restrictive approach here would be inconsistent with inquiry best practice and will give rise to damaging confidence concerns from the outset of the Inquiry's work.
 32. Fourth, if the Inquiry seeks to apply a more restrictive approach than one of "potential relevance", that will place the Inquiry in an onerous position. What alternative approach would be used? "*Focused and proportionate*" does not provide any test that can be properly and evenly applied. A risk of inconsistent decision-making by the Inquiry, and withholding important material from CPs, will arise and should be avoided.
 33. Fifth, adopting a more restrictive approach to CP disclosure will confer no tangible benefits on the Inquiry. The Inquiry Team will still have to review all potentially relevant material produced by material providers, the disclosure to CPs will (we anticipate) already be

substantial, disclosure will take place electronically, and in those circumstances disclosing all material of potential relevance will not impose any additional burden on the Inquiry, indeed quite the opposite.

Instruction of expert witnesses

34. CBFFJ note the indication from CTI that the Inquiry will consider suggestions from CPs on experts and that questions for experts will be made available to CPs prior to reports being finalised so that CPs can provide their observations (§§58-59). CBFFJ invite the Inquiry to go further: CPs should be invited to make observations on areas of expert instruction, the identification of experts, and the terms of their instruction. This is the appropriate course given the centrality of expert evidence to this Inquiry. It is therefore essential that the relevant experts are appropriately selected (with input from the bereaved and other CPs) and appropriately instructed (to ensure that they cover adequately this central part of the Inquiry's evidential picture). CBFFJ look forward to providing submissions on the Module 1 experts to the Inquiry, once we understand the scope of Module 1 more fully.

The listening exercise

35. CBFFJ note the contents of CTI's note (§§62-64) and the STI note dated 13 September 2022. CBFFJ is concerned that the current proposal – advanced without any meaningful dialogue or consultation with the bereaved, and subject to a tender process of which the bereaved were unaware until seeing it in the national press – will result in a parallel process, disconnected from the Inquiry, that will marginalise the bereaved and their experiences, and remove important, relevant evidence from the Inquiry process. That is for the following reasons:

36. On 1 April 2022, and again on 30 June 2022, CBFFJ raised with the Inquiry the importance of the Chair hearing proportionate evidence, as a central and integrated part of the Inquiry, that would (a) memorialise the deceased and allow the bereaved to speak publicly about their loss and its impact, (b) incorporate evidence of the circumstances of deaths, and (c) allow the Inquiry to hear about the effect of the loss on the bereaved themselves.⁴ The first of those three strands of evidence from the bereaved – referred to as “pen portraits”, “memorials” or “commemorations” in recent statutory inquiries – has been adopted in many high-profile and/or mass fatality inquests and inquiries in recent years, including the Hillsborough Inquests, the Manchester Arena Inquiry and the Grenfell Tower Inquiry.

37. Our April and June submissions recognised the particular scope of this Inquiry and the fact that it will not determine the circumstances of individual deaths. However, while we recognise that the Inquiry cannot determine the circumstances of individual deaths, this does not remove the imperative to memorialise the deceased, in what is a mass fatality Inquiry, in a sensitive and inclusive way. Furthermore, our earlier submissions proposed a proportionate approach, recognising the importance of timescale and the huge number of deaths. Our proposal allowed for no one to be left out but suggested a limited timetabling of memorials within the hearings. That remains CBFFJ's position.

38. Having considered the CTI and STI notes, it also remains CBFFJ's position that evidence

⁴ These submissions also set out CBFFJ's views on the need for the Inquiry to consider evidence regarding the circumstances of those who have died, including the experiences of their loved ones.

regarding circumstances of death may be vital to understanding particular issues within the Inquiry's ToR. For example, issues relating to the efficacy of the 111 or 999 systems, or the use of DNRs should be heard within the Inquiry and not relegated to a summary produced by outsourcing to unspecified researchers. Once again, our proposal on this strand of evidence from the bereaved took full account of the extent of such evidence and its proportionate use. There may be an additional utility in providing summaries of evidence where there is a wealth of material on a particular issue, but that should at least be overseen by the Inquiry team and the CP representatives in the normal way. As we have set out earlier in these submissions, there should be dialogue.

39. The objective of the CBFFJ proposals was to assist the Chair and her team in determining the best way for the bereaved families not only to participate, but to do so in such a way that is meaningful for both them (in terms of providing them with a voice within the Inquiry), and for the Inquiry (in placing the devastating human impact of the Inquiry's subject matter at its heart and hearing relevant evidence regarding circumstances of death). No substantive response was provided to CBFFJ's proposal, merely a one paragraph rejection of the submissions in STI's note dated 13 September 2022, referring only to the commemoration aspect (see §2.3), followed by §§62-64 of CTI's note.
40. As summarised above, CBFFJ has repeatedly sought to engage the Inquiry Team in dialogue regarding the Inquiry's proposed "listening exercise"⁵, in particular an email was sent on 19 August asking a number of questions to understand what is being proposed and make appropriate representations.⁶ Having considered the recent notes from CTI and STI, CBFFJ remain concerned that the listening exercise will marginalise the role of the bereaved, remove the devastating human impact of Covid from the core of the Inquiry's work, and divert vital evidence concerning the circumstances of the deaths caused by Covid into a parallel, informal process that does not form part of the Inquiry's evidence, save through a summary produced by a "research and analysis company(ies)".
41. As described by the Inquiry's notes, this process will not form part of the Inquiry, it will be outsourced, involving neither the Inquiry team nor the Inquiry's own representatives, and resources will not be provided to the representatives of the families to advise or assist them. This is not putting the bereaved families at the centre of the Inquiry's process and sends the

⁵ In their submissions of 30 June 2022, CBFFJ stated as follows at §2:

"From an early stage, the Chair has made reference to a 'listening project' and in recent weeks the Inquiry team has asked the Covid 19 Bereaved Families for Justice (CBFFJ) to put forward a number of families to take part in a pilot project. The families are anxious to assist the Inquiry, however, despite a number of requests for information, it remains unclear as to what is meant to be included within that process or what it is proposed to entail. We repeat our previous requests as clearly as is possible: all these matters should be subject to discussion between the Inquiry team and those representing the families at the earliest opportunity."

⁶ This has included asking the Inquiry Team the following questions:

- a. What is the listening exercise and how it will work?
- b. Who will be doing the 'listening'?
- c. What qualifications they will have?
- d. What training they will have?
- e. Whether the thoughts and comments of the bereaved families will be filtered, and how they will be recorded?
- f. How and by whom will the material be analysed, including qualification and training of those analysts?
- g. To whom will the material be disclosed?
- h. What will be the form of the material considered by the Inquiry?
- i. How will it be presented to the Inquiry?
- j. Whether there is an intention to respond to our written submissions concerning pen portraits, evidence from the families regarding the circumstances of death, and evidence of the effect of the bereavements on the families.

wrong message to the bereaved. It also deprives the Chair and the panel of first-hand evidence which has proved so powerful in other inquiries.

Commemoration

42. CBFFJ have considered the CTI and STI notes addressing this issue. In summary, the Inquiry proposes a moment of reflection at the start of the preliminary hearing on 4 October 2022, the possibility of a physical installation in the future hearing venue, and the possibility of using the Inquiry website in the future. This is not sufficient.
43. Both the CTI and STI notes suggest that CBFFJ previously sought “*extensive pen portrait evidence to be heard*” (§§68 and 2.3, respectively). That is not accurate. CBFFJ provided a detailed, careful and proportionate proposal on this vital issue, which would allow for commemoration/pen portraits to form part of the Inquiry hearings, while doing so in a measured and proportionate way.
44. The bereaved families that make up CBFFJ are reasonable and want the Inquiry to make progress. The proposal was intended to ensure such progress could take place, while upholding the centrality of commemorative evidence and the direct involvement of the Chair in hearing a proportion of such evidence. CBFFJ therefore invite the Inquiry to reflect and engage in the dialogue that CBFFJ has sought. We would welcome such discussions; the Inquiry’s proposals in this area are a prime example where the process will only work with such dialogue between the Inquiry and the bereaved.

Future hearing dates

45. CBFFJ is anxious that the Inquiry should make progress; it sought the speedy establishment of this Inquiry, over a lengthy period, before it was eventually established. However, progress should not come at the expense of rigour, thorough investigation and effective participation. CBFFJ is surprised at the four week proposal for the Module 1 public hearings and concerned that rigour, thoroughness and participation will be sacrificed as a result. To take just one example, it is difficult to see how the Module 1 hearings could be conducted in just four weeks without a highly restrictive approach to Rule 10 questioning in respect of the bereaved. That is a matter of considerable concern to CBFFJ.
46. Finally, we note the choice of venue for this preliminary hearing with very limited space for the commencement of an Inquiry of this sort. Although we welcome arrangements for streaming, which allows for many more to be virtually present, we request that arrangements for future hearings are subject to collaboration between the Inquiry team and CPs to ensure that all concerns are considered.

28 September 2022

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