

**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  
CYMRU' IN ADVANCE OF THE PRELIMINARY HEARING IN MODULE 2  
ON 31 OCTOBER 2022**

---

1. Covid-19 Bereaved Families for Justice Cymru ('CBFJ Cymru') is a Welsh focused group dedicated solely to campaigning for and giving a voice to those bereaved by Covid-19 in Wales.
2. CBFJ Cymru thanks the Chair for designating it as a Core Participant in the Module 2 hearings of this Public Inquiry and for the Chair's recognition that CBFJ Cymru is best placed to assist this Public Inquiry to achieve its aims by representing the collective interests of a broad spectrum of those bereaved by Covid-19 in Wales in relation to Module 2.
3. It is vitally important that the people of Wales can have full confidence that this Public Inquiry will fully scrutinise decision-making in Wales in respect of Covid-19 and that the experiences and voices of the Welsh people will be properly heard and represented. CBFJ Cymru welcomes the Chair's indication that this Public Inquiry will come and hear evidence in Wales on Module 2(B) and parts of other modules.
4. As the Chair will be aware, there is no separate Inquiry being undertaken in Wales, which means that this Inquiry is of particular importance to the people of Wales. The Inquiry sitting in Wales in Module 2(B) and parts of other Modules, will give confidence to CBFJ Cymru, and hopefully Wales as a whole, that this Inquiry takes the interests of Wales seriously and intends to thoroughly examine all those matters which touch upon the interests of Wales.

5. CBFJ Cymru welcomes the Chair's commitment to looking at the actions of the devolved administrations. However, as the Chair will be aware there are still concerns in Wales that the preliminary scope of Module 2 does not set out in any detail the Welsh specific issues that ought to be investigated by this Public Inquiry in Module 2.
6. As the Chair appreciates, Wales is a separate country, with a devolved government. Although Wales receives funding from the UK Government, responsibility for health and social care is devolved to the Welsh Government. Wales has its own healthcare system. NHS Wales is comprised of Local Health Boards, NHS Trusts and Public Health Wales. Relevant offices and agencies such as the Office of the Chief Medical Officer and Care Inspectorate are specific to Wales.
7. This means that the key decisions made in Wales in relation to the Covid-19 pandemic were largely separate to and quite often different from those taken by the UK Government. Clearly, Wales has strong links with the UK Government and the other devolved Governments, and it will obviously be necessary in Module 2 to unravel the links between these Governments and the extent to which they influenced the Welsh Government, whether for good or bad.
8. In relation to Module 2 CBFJ Cymru also wishes to highlight some other areas of concern that this Public Inquiry must scrutinise in relation to Wales. These include, for example:
  - a. To what extent was there a sharing of knowledge between Wales and UK government, in particular, scientific, medical and other expert knowledge;
  - b. Why did the actions taken, or not taken, by the Welsh Government differ from those taken by the UK Government;
  - c. Were the actions taken, or not taken, by the Welsh Government justifiable in the light of the state of knowledge, whether expert or otherwise, at the material time;
  - d. To what extent were the decisions of the Welsh Government supported, or not supported, by expert opinion;
  - e. To what extent were the actions of the Welsh Government influenced by political considerations.

9. Further, the Inquiry is invited to consider the list of items it intends to cover in respect of the four countries. For reasons that CBFJ Cymru cannot understand, the scope raises different issues in Module 2, Module 2(A), Module 2(B) and Module 2(C). Thus, in Module 2(A) it refers to “super-spreader” events, but there is no similar reference to these type events in Module 2. There were such similar musical and sporting events in Wales. The Wales v Scotland rugby international in 2020 was cancelled on the day before it was due to take place, by which time very large numbers of Welsh and Scottish supporters had descended on Cardiff. Attached to this Submission and marked ‘M2’ is our analysis of the difference of emphasis found in Module 2 and the related Modules. CBFJ Cymru believes that there should be a consistent approach to the four countries.
10. CBFJ Cymru looks forward to making further submissions to the Public Inquiry after disclosure has been received and to assist the Chair in understanding how scope needs to be developed in respect of Module 2 for Wales. CBFJ Cymru welcomes the Chair’s indication that the Listening Exercise is still in development and that further details will be provided in due course. CBFJ Cymru has offered its commitment to continue working with the Inquiry Team to assist in the development of the Listening Exercise. Submissions will be made where necessary on all the other matters raised in Counsel to the Inquiry’s Note of 22 October 2022.

**Craig Court**  
**Harding Evans Solicitors**  
**RLR**

**Lloyd Williams KC**  
**Bethan Harris**  
**Kirsten Heaven**  
**Nia Gowman**  
**Laura Shepherd**  
**Counsel**  
**26 October 2022**